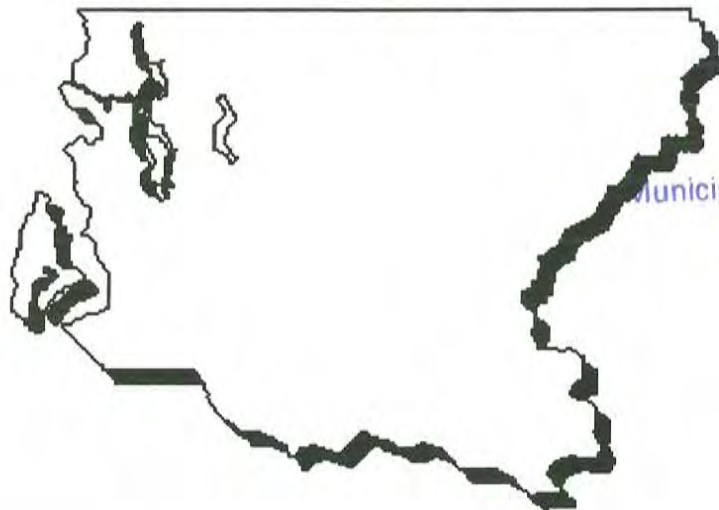




Final Supplemental Environmental Impact Statement for the Countywide Planning Policies Proposed Amendments



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May 18, 1994



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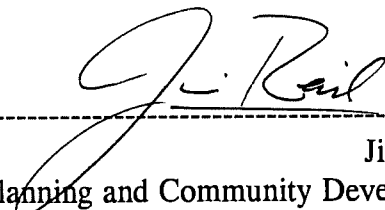
**FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT
STATEMENT**

**PROPOSED POLICY AMENDMENTS TO THE COUNTYWIDE PLANNING
POLICIES**

Prepared for Review by Citizens and
Government Agencies in Compliance with:

The State Environmental Policy Act of 1971
Chapter 43.21C Revised Code of Washington
SEPA Rules, Effective April 4, 1984, as revised
King County Code Chapter 20.44

Date of Issue: May 18, 1994



Jim Reid, Manager
Planning and Community Development Division

**FACT SHEET
KING COUNTY
SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT
FOR AMENDMENTS TO THE COUNTYWIDE PLANNING POLICIES**

Project Title

Proposed Policy Amendments to the King County Countywide Planning Policies (CPPs).

Proposed Action

The proposed action consists of amendments or policies to refine the existing King County CPPs for adoption by the Metropolitan King County Council, and ratification by cities as specified in the interlocal agreement that established the Growth Management Planning Council. The proposed amendments or refinements include additional policies on rural character, affordable housing, and economic development and fiscal impact. The proposed action also includes designation of urban centers and manufacturing/industrial centers and establishes growth targets jurisdictional (minimum targets per household) as called for in King County Ordinance No. 10450.

Five alternatives were analyzed in the Draft SEIS and include: No Action; Eight Centers Alternative; 14 Centers Alternative, Pre-Countywide Planning Policies Alternative; and the Magnet Alternative. Several policy variations on these alternatives also were analyzed in the document. The Final SEIS analyzes the GMPC recommended amendments to the CPPs. This FSEIS supplements the VISION 2020 FEIS, the FEIS for the 1985 King County Comprehensive Plan, and other environmental documents referenced in the Declaration of Significance which accompanied adoption of the CPPs in July 1992.

Location of the Proposal

King County, Washington: The CPPs serve as the framework for the update of the King County Comprehensive Plan and the local comprehensive plans of each jurisdiction within King County.

Lead Agency and Source of Proposal

King County
Planning and Community Development Division
Parks, Planning and Resources Department
707 Smith Tower Building
506 Second Avenue
Seattle, WA 98104

Proposed Date of Implementation

Council adoption is anticipated in June 1994. The CPPs would be implemented through local jurisdictions' comprehensive plans.

Responsible Official

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Licenses/Permits/Approval Required

Amendments to the CPPs can not become effective until adoption by the Metropolitan King County Council and ratification by at least thirty percent of the City and County Governments representing seventy percent of the population in King County.

Authors and Principal Contributors

The FSEIS has been prepared by the King County Planning and Community Development Division, which also was responsible for the DSEIS Affected Environment Section. The following consulting firms contributed to the DSEIS.

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Location of Background Information

Copies of the CPPs and environmental documents are available at the address below:

Planning and Community Development Division
Parks, Planning and Resources Department
707 Smith Tower Building
506 Second Avenue
Seattle, WA 98104
(206) 296-8640

Cost and Availability of the Final SEIS

Planning and Community Development Division
Parks, Planning and Resources Department
707 Smith Tower Building
506 Second Avenue
Seattle, WA 98104
(206) 296-8640

\$20.00

PREFACE

The purpose of the Final Supplemental Environmental Impact Statement (FSEIS) is to consider the environmental impacts of proposed policy amendments to the Countywide Planning Policies (CPPs).

The FSEIS consists of two documents. The first document is the Draft Supplemental EIS (DSEIS) which was issued January 12, 1994. It analyzes the environmental impacts of five alternatives and several policy variations to the CPPs (pursuant to WAC 197-11-405 and WAC 197-11-11-620). It compares significant impacts, mitigation measures and unavoidable adverse impacts of the alternatives and policy variations.

This document is the second document of the FSEIS. It analyzes proposed policy amendments the Growth Management Planning Council (GMPC) will recommend to the Metropolitan King County Council. The GMPC recommendations fall within the scope of the alternatives and impacts analyzed in the DSEIS.

The main part of the FSEIS presents comments and responses to comments received on the DSEIS. 132 letters and GMPC testimonies were received from state and local agencies and from individuals. Responses are provided for issue areas (specific questions) compiled from all comments. In general, responses were prepared for substantive comments to errors, omissions or possible deficiencies in the DSEIS. In some cases, additional analysis was conducted to clarify impacts in the DSEIS. Statements of concurrence with DSEIS assessment, assertions or personal positions on an issue, and value judgments have been acknowledged and incorporated in the FSEIS without further substantive response.

The adoption of the amendments to the CPP's is a non-project action. For non-project actions, lead agencies have greater flexibility in producing an EIS because less specific details are known about the proposal and any implementing measures as well as potential significant impacts on the environment (WAC 197-11-442). Because the EIS is program-oriented rather than project-specific, much of the impact analysis indicates a general direction of change in the environment resulting from the proposed action rather than placing exact values on the extent of the impacts. The general direction of impacts and mitigation that was discussed in the DSEIS did not change as a result of the GMPC recommendations.

The FSEIS is intended to be used by King County and other jurisdictions completing their Comprehensive Plans. Specific projects which have been determined to have a significant adverse impact on the environment will be required to prepare a project EIS

(WAC 197-11-360). However, parts of this FSEIS may be used to revise and/or reduce the scope of the EIS by reference to relevant information for each element of the environment (WAC 197-11-443).

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FINAL SEIS DISTRIBUTION LIST

PART ONE:

Growth Management Planning Council

**Proposed Amendments to the 1992
Countywide Planning Policies**

As of May 14, 1994

GROWTH MANAGEMENT PLANNING COUNCIL
Proposed Amendments to the 1992 Countywide Planning Policies
As of May 14, 1994

CHAPTER NAME	POLICY	DESCRIPTION
Framework	Preamble	Provides definitions for Shall, Should and May
	FW-1	Revise CPP adoption process; review land capacity in 1995; establish monitoring program; review UGA in 10 years
	FW-1 5c	Criteria for amendment of UGA during 10-year review
	FW-4	New Policy to monitor targets annually and make amendments every 6 years
	FW-7	Delete "local" from benefits provided by rural cities
Critical Areas	CA-5	Preparation of aquifer maps using common criteria
	CA-6	New Policy requires land use decisions to take into account aquifer locations and impacts
Rural Areas	FW-RU a, b	Jurisdictions are to maintain the basic elements of Rural Character
	FW-RU a	Defines Rural Character
	FW-RU-b	Outlays the methods to use to maintain Rural Character
	RU-1	Retain farming and forestry where appropriate in rural areas
	RU-2	Allows K-12 schools in rural areas; limits uses to low-density residential
	RU-3	Limits infrastructure improvements in rural areas
	RU-4	Limits impacts of urban land use on rural areas
	RU-5	Outlines housing densities in rural areas
	RU-6	Outlines conditions for clustering housing in rural areas
	RU-7	Outlines conditions for transferring density from rural area properties
	RU-8	Rural area ecosystems are to guide location and intensity of land uses
	RU-9	Outlines development standards in rural areas
	RU-10	Outlines groundwater recharge and storage standards in rural areas
	RU-11	Use on mineral, oil, and gas deposits is to maintain environmental quality
	RU-13	Outlines street standards in rural areas
	RU-14	Outlines water system standards and management in rural areas
	RU-15	Outlines water system standards in rural areas
	RU-16	Discourages locating regional public facilities in rural areas
	RU-17	Encourages farming and forestry in rural areas through incentives
	RU-19	Calls for additional products in the future to help protect rural areas
Land Use	LU-11	Makes optional the designation of "new" rural areas; recognizes legally created lots
	LU-13	(Deleted)
	LU-14	UGA to accommodate 20-year growth with phased urban governmental services
	LU-15	County review of modifications to designated urban separators
	LU-17	Calls for consistency of capital facilities plans and 6-year pop/emp targets
	LU-26	(New criteria)
	LU-28	Adopts nominated centers
	LU-29	Ensure adequate drinking water supply for urban centers
	Preamble	Add advanced technology to man/ind centers
	FW-12	Add advanced tech. to man/ind centers, discourage large office/retail
	FW-12	Requires fast-track permitting in man/ind centers
	LU-39	Designates man/ind centers

GROWTH MANAGEMENT PLANNING COUNCIL
Proposed Amendments to the 1992 Countywide Planning Policies
As of May 14, 1994

CHAPTER NAME	POLICY	DESCRIPTION
Land Use	LU-39	Language to clarify action already taken
	LU-40	Add advanced tech. to man/ind centers, limit size of office and retail uses
	LU-40	Promotes aggregation of land within man/ind centers
	LU-41	Change regional citing policy to promote all industrial activity
	LU-43	Identify feeder systems and other transit options in man/ind centers with HCT
	LU-45	Delete restrictions on SOV in man/ind centers; calls for mass transit service
	LU-46	Adds utilities to list of strategies in man/ind centers
	LU-47	Changes discussion of HCT in man/ind centers
	Preamble	Describes targets
	LU-51	Process for adopting targets for minimum net new households by jurisdiction
	LU-52 (appx)	Adopts household targets by jurisdiction
	LU-52	Criteria for household targets include provision of capital facilities and utilities
	LU-53 (appx)	Adopts employment targets by jurisdiction
	Text	Describes function and designation of Activity Areas
	FW-14	New Framework Policy establishing Activity Areas, local designation
	LU-55	Recognizes mix of uses in Activity Areas, adds housing and open space
	LU-56	Links household and employment densities in Activity Areas to transit
	LU-57	Change "shall" to "should" for parking requirements in Activity Areas
	LU-58	Add business/office parks to Activity Area where transit support exists
	LU-59	Delete prescriptive language; provide incentives for mixed use in business/office parks
	LU-61	Business/Office Parks are encouraged where they can be served by transit
	LU-62	Provide for residential and neighborhood uses in business/office parks
Affordable Housing	FW-24	Plan for all economic segments of the community
	AH-1	Estimate housing availability for four income ranges
	AH-2	New housing programs and funding; local planning targets for low and moderate income housing
	AH-3	Preservation of low-cost housing
	AH-4	Technical assistance and educational efforts
	AH-5	Monitoring development trends and low/moderate income housing development
	AH-6	Evaluation of countywide and local housing performance
Contiguous and Orderly Devmt.	CO-15	Conditions urban water system expansion into rural areas
	CO-16	Outlines water system standards and management in rural areas
Economic Development	Preamble	Defines economic development
	ED-1	Local plans shall support the region's economic base
	ED-2	Jurisdictions shall cooperatively identify development and diversification goals
	ED-3	Plans shall attract, retain firms in industrial areas
	ED-3a	Recognizes the economic importance of major facilities, institutions and companies such as the University of Washington
	ED-4	Calls for balance of economic growth and the environment
	ED-5	Encourages water and power conservation
	ED-6	Jurisdictions shall identify and help meet the needs of economically disadvantaged citizens and areas
	ED-7	Jurisdictions shall cooperate to meet training and education needs
	ED-8	Jurisdictions shall plan for and monitor land supply

GROWTH MANAGEMENT PLANNING COUNCIL
Proposed Amendments to the 1992 Countywide Planning Policies
As of May 14, 1994

CHAPTER NAME	POLICY	DESCRIPTION
Economic	ED-9	Plans shall foster a climate supportive of industry and high-wage jobs
Development	ED-10	Encouraged to site resource and agriculture industries close to resource, even in rural areas
and Finance	ED-11	Infrastructure providers shall consider economic development goals when making decisions
	ED-12	Develop infrastructure funding strategies which consider regional costs and benefits
	ED-12a	Seek state legislative and local funding to clean up contaminated industrial sites
	ED-13	Identify areas which can be used for industry and consider incentives
	ED-14	Jurisdictions shall develop permit processes with time periods for approval
	ED-16	Jurisdictions may prepare non-project Environmental Impact Statements
	ED-17	Jurisdictions encouraged to establish master utility permits
	ED-18	Foster the use of public/private partnerships for economic development
	ED-19	Establish monitoring, evaluation and benchmarks to measure achievement of goals
	RFS-5	Affordable housing in Urban Centers, infill and redevelopment areas
	RFS-6	Financing plan for annexation areas
	LU-35	Delete date
	LU-48	Delete date
	FW-34	Regional Governance Plan to be prepared
Other	Snoqualmie	
	UGA Map	Delete Joint Planning Area from Snoqualmie UGA
	Target Chart	Proposed growth targets for households and employment
	Introduced	
	Amendments	Amendments introduced to the GMPC, not yet voted upon

King County 2012

A. The Problem

King County has long been known for unsurpassed natural beauty and a dynamic human environment. It has thriving cities and suburbs and healthy rural communities. The county's attractive lifestyle and economy continue to draw people into our region.

But unmanaged growth and development endanger some of those very qualities. An additional 325,000 people will live here by the year 2010 (State of Washington Office of Financial Management), bringing the total population to 1.8 million. While growth fuels the area's strong economy, the absence of effective management of that growth threatens the features that are essential to a rich quality of life.

The effects of uncoordinated and unplanned growth are obvious. King County has the fifth worst traffic mess in the nation, declining air and water quality, flooding aggravated by development, and escalating housing costs. Many of the schools are over-crowded and local governments are struggling to pay for increased demands for services to control crime and to provide critical human resources.

The need facing the County and State is to provide the incentives necessary to promote a vigorous, sound, and diversified economy, while reducing, controlling and managing the potential adverse effects of uncoordinated and unplanned growth.

The Washington State Legislature passed the Growth Management Act (GMA) in 1990 and strengthened it in 1991 to address these problems.

B. The Process

Growth management involves planning for economic and population growth, determining where new jobs and housing should go and then locating and phasing population growth in accordance with the ability to provide infrastructure and services. This should include economic development, a workable transportation system, quality drinking water, affordable housing, good schools, open space and parks and, at the same time, protection of our natural environment.

King County and the 31 cities within it are addressing growth management problems together and in their local jurisdictions. Planning at both levels is called for by the Growth Management Act.

All jurisdictions are working together to develop a vision for the future. This vision is embodied in this series of policies called Countywide Planning Policies. Realization of this vision involves trade-offs and difficult choices about the appropriate level of growth, its location, the type of growth to be encouraged, public spending, governance decisions, environmental protection, and the quality of life in King County.

1 A formal body, the Growth Management Planning Council, with elected officials from
2 Seattle, the suburban cities, and King County, has considered these draft policies, and based on
3 public input, will make a recommendation to the King County Council for adoption. Adoption
4 must take place by July 1, 1992. King County will then submit the adopted policies to the
5 cities for ratification.

6 The Countywide Planning Policies will serve as the framework for each jurisdiction's
7 own comprehensive plan, which must be in place by July 1, 1993. These individual
8 comprehensive plans throughout the county, then, will be consistent with the overall vision for
9 the future of King County.

10 **C. The Growth Management Act**

11 The GMA fundamentally changes the way that comprehensive planning is to be done
12 and land use decisions are to be made in Washington State. The challenge of GMA is to
13 establish a countywide vision and devise a strategy to achieve it. This includes balancing
14 growth, economics, land use, infrastructure, and finance. If resources are inadequate to realize
15 the vision, then the strategies and land use must be revised. The GMA requires Countywide
16 Planning Policies be adopted by July 1, 1992. At a minimum, the policies must address:

- 17 a. Implementation of RCW 36.70A.110 (Urban Growth Areas);
- 18 b. Promotion of contiguous and orderly development and provision of urban
19 services;
- 20 c. Siting of public capital facilities;
- 21 d. Transportation facilities and strategies;
- 22 e. Affordable housing;
- 23 f. Joint county and city planning within Urban Growth Areas;
- 24 g. Countywide economic development and employment; and
- 25 h. Analysis of fiscal impact.

26 Special emphasis is placed on transportation. Future development activity will be
27 constrained by a jurisdiction's ability to provide and finance transportation improvements or
28 strategies. This fact has implications for all jurisdictions who can no longer finance and build
29 the facilities necessary to retain current service levels.

30 **D. Vision for King County 2012**

31 Our county has significantly changed in the 20 years that have elapsed from 1992 to
32 today. The paramount cause for this change has been the successful public/private partnership
33 which has: supported a diversified, sound regional economy; managed and accommodated
34 growth; and maintained the county's quality of life.

1 An effective stewardship of the environment has preserved and protected the critical
2 areas in the county. This stewardship has extended to the conservation of our land, air, water
3 and energy resources for future generations.

4 The rural areas first formally identified in 1985 and expanded in 1992 remain
5 permanently preserved with a clear boundary between rural and urban areas.

6 Development has emphasized the use and reuse of the existing urbanized areas. Much
7 of the new growth after 1992 first occurred in the areas where there was existing capacity.
8 Growth then occurred where existing infrastructure could be easily extended or enhanced.
9 Lastly, areas which required significant new investment in infrastructure accommodated
10 growth. Today, there still is ample room for new development within the urban area.

11 Much of the growth in employment, and a significant share of new housing, has
12 occurred in Urban Centers. These Centers now provide a mixture of employment, residential,
13 commercial, cultural and recreational opportunities. The centers are linked by the high-
14 capacity transit system, and transit stations within the centers are located within walking
15 distance to all parts of the center. Each center has its own unique character, and they are all
16 noted for their livability, pedestrian orientation and superior design.

17 Smaller concentrations of businesses are distributed throughout the urban area, and
18 focus on providing goods and services to surrounding residential areas. They are linked to
19 Urban Centers by an effective local transit system.

20 Manufacturing/industrial areas continue to thrive and be key components in the urban
21 area. They are served by a transportation system which emphasizes the movement of people
22 and goods to and within these areas.

23 Rural cities provide unique environments within the rural area and provide commercial
24 and employment opportunities for their residents. This includes retail, educational and social
25 services for city residents and surrounding rural areas. Businesses in rural cities provide
26 employment opportunities for local residents.

27 The entire urban area is increasingly characterized by superior urban design and an
28 open space network which defines and separates, yet links the various urban areas and
29 jurisdictions. Countywide and regional facilities have been located where needed, sited
30 unobtrusively and with appropriate incentives and proper impact mitigation.

31 Attractive and workable alternatives to the single-occupant vehicle have been built and
32 strategies adopted which assure the mobility of people, goods and information throughout the
33 county and beyond.

34 Regional funds have been used to further the regional land use plan and fund needed
35 regional facilities. Local resources have been focused on local facilities. The sharing of

resources to accomplish common goals is done so that the regional plan can succeed and so that all can benefit.

The economy is vibrant and sustainable, and emphasizes diversity in the range of goods produced and services provided. Businesses continue to locate in our county because of the high quality of life, the emphasis on providing a superior education, and the predictability brought about by the management of growth and the effectiveness of the public/private partnership in these areas as well as the mutually beneficial partnership in economic development.

Housing opportunities for all incomes and lifestyles exist throughout the county, and with the balanced transportation system, access to employment is assured.

The needs of residents are attended to by a social service system that emphasizes prevention, but which stands ready to respond to direct needs as well.

The urban area is located within the incorporated cities, which are the primary urban service providers. Where appropriate, sub-regional consortiums have been created for certain services, and the county government is recognized as a regional service provider.

Through a clear understanding of growth management, residents and businesses have recognized that all problems will not be cured quickly, but clear and reasonable timelines and financing commitments demonstrate to them that problems will be solved. Residents and businesses trust in their local governments because the plans and promises made to manage growth in 1992 have been followed. Change is accepted and proceeds in an orderly fashion based on the growth management plan.

When a countywide policy states that a jurisdiction "shall" or "will" do something, such a policy requires the jurisdiction's comprehensive plan to contain a policy that is written to accomplish the purpose of the countywide policy. When a countywide policy states that a jurisdiction "should" do something, such a policy requires the jurisdiction's comprehensive plan to contain a policy that is written to accomplish the purpose of the countywide policy unless the jurisdiction identifies reasons why it has not done so. When a countywide policy states that a jurisdiction "may" do something, such a policy suggests the jurisdiction's comprehensive plan to contain a policy written to accomplish the purpose of the countywide policy if it is in their interest.

E. The Framework Policies

The GMA gives local officials new tools for planning and, for the first time, mandates that the county and cities work together to establish an overall vision. Through a collaborative process, the local jurisdictions of King County have prepared the following draft countywide planning policies. This process relies on local choice to determine the density/intensity and

1 character of each area. All jurisdictions must recognize that the smart, long term choices for
2 the region will require compromises in local self-determination.

3 These policies represent a cohesive set and are not individual, stand-alone concepts.
4 The ideas represented here balance each other to establish a vision for the county which builds
5 on existing land use patterns. The policies are organized by topics in separate chapters. At the
6 beginning of each chapter is a framework policy which establishes the overall direction for the
7 following policies. The Countywide Planning Policies can only be realized through local plans
8 and regulations. A decision made locally must become a commitment that the region can rely
9 upon. The following framework policies outline the countywide planning process.

10 FW-1. Countywide growth management is a multi ((five))-step process:

11 STEP 1: The Countywide Planning Policies became ((shall become)) effective October
12 1992, upon adoption by the King County Council and ratification by at least thirty percent of
13 the city and county governments representing seventy percent of the population in King
14 County. ((September 1992 target date))

15 STEP 2: The Growth Management Planning Council (GMPC) reconvened to conduct
16 environmental and fiscal analysis of the Countywide Planning Policies and to consider policy
17 amendments developed through implementation of tasks specified in the Countywide Planning
18 Policies. These actions are considered the Phase 2 policy amendments and include:

19 a. Designation of Urban Centers according to the procedures and criteria
20 established in policies LU-28 and LU-29;

21 b. Designation of Manufacturing/Industrial Centers based on the procedures and
22 criteria established policies in LU-39 and LU-40;

23 c. Adoption of 20 year targets of projected household and employment growth
24 countywide and for each jurisdiction according to the procedures and criteria in policy LU-52;

25 d. Confirmation of the Urban Growth Area based on criteria established in policy
26 LU-14; and

27 e. Adoption of additional policy amendments based on the recommendations of
28 the Rural Character Task Force, the Affordable Housing Task Force, the Fiscal and Economic
29 Development Task Force, and public comments on the Countywide Planning Policies.

30 ((a. The Growth Management Planning Council (GMPC) shall receive by October
31 and confirm by December 1992 nominations from cities for Urban Centers and
32 Manufacturing/Industrial Centers as established in the Countywide Planning Policies.
33 (October-December 1992 target dates)

34 b. The GMPC shall adopt 20 year target numbers for projected population growth
35 and capacity based on Urban Centers decisions, the criteria established in policies LU-51 and

1 ~~LU 52, and population ranges recommended by an interjurisdictional staff committee.~~
2 ~~(December 1992 target date)~~

3 ~~c. The GMPC shall adopt 20 year target numbers for projected employment~~
4 ~~growth and capacity based on Urban Centers decisions, the criteria established in policy LU~~
5 ~~53, and employment ranges recommended by an interjurisdictional staff committee.~~
6 ~~(December 1992 target date)))~~

7 ~~f.((d-))~~ Housing and jobs to accommodate King County's ~~((projected population))~~
8 growth targets shall be planned in the context of carrying capacity of the land. Housing
9 density and affordability shall be considered co-equal objectives.

10 ~~((e. The GMPC shall confirm the Urban Growth Areas based on Centers~~
11 ~~designations and subarea population and employment targets, insuring sufficient capacity~~
12 ~~within the Urban Growth Area to meet projected growth. (December 1992 target date).))~~

13 STEP 3: The Countywide Planning Policies shall be implemented as follows:

14 a. All jurisdictions shall make the decisions required to implement the
15 Countywide Planning Policies into their respective comprehensive plans. (July ((1993)) 1994
16 target date)

17 b. All jurisdictions shall make the decisions required to implement the
18 Countywide Planning Policies and their respective comprehensive plans through development
19 regulations. (December 1994 target date)

20 ~~((STEP 4: a. The GMPC shall reconvene in July 1993 or sooner as needed to review~~
21 ~~issues raised through local plan implementation efforts, and to consider new or revised policies~~
22 ~~developed through implementation of the GMPC tasks specified in the Countywide Planning~~
23 ~~Policies. The GMPC shall recommend revisions as needed to resolve identified conflicts~~
24 ~~between policies and address implementation issues. (July 1994 target date)))~~

25 ~~c.((b-))~~ The GMPC shall establish a process for resolving conflicts between local
26 plans and the Countywide Planning Policies. ~~((as raised by local jurisdictions, and may~~
27 ~~recommend amendments to either the Countywide Planning Policies or local plans. (July 1994~~
28 ~~target date)))~~

29 d.((e-)) Phase 2 Amendments to the Countywide Planning Policies shall be
30 subject to ratification by at least thirty percent of the city and county governments representing
31 seventy of the population in King County. All jurisdiction shall amend comprehensive plan as
32 needed by July 1995 to be consistent with adopted and ratified Phase 2 amendments. (((July
33 1994 target date)))

1 ~~((STEP 5: All jurisdictions shall make the decisions required to implement the~~
2 ~~Countywide Planning Policies and their respective comprehensive plans through regulations-~~
3 ~~(July 1994 target date)))~~

4 STEP 4: Following adoption of comprehensive plans, the GMPC or its successor shall
5 review adopted targets and estimated capacity for each jurisdiction to ensure sufficient capacity
6 within the Urban Growth Area.

7 a. Each jurisdiction shall report to the GMPC or its successor the household and
8 employment targets adopted in its comprehensive plan, and the estimated capacity for
9 household and employment growth for the next 20 years. Jurisdictions containing Urban or
10 Manufacturing/Industrial Centers shall report household and employment targets both for
11 Centers and areas outside Centers. Each jurisdiction shall also evaluate the availability of
12 infrastructure, as anticipated in local capital improvement plans, to ensure that capacity is
13 available to accommodate a six-year estimate of household and employment growth.

14 b. The GMPC or its successor shall review growth targets and capacity for each
15 jurisdiction to assure that local targets are within the adopted ranges and countywide capacity
16 is sufficient to meet 20 year growth targets. If a discrepancy exists between growth targets
17 and capacity, the GMPC or its successor shall recommend amendments to Countywide Policies
18 or local plans to ensure that growth targets can be achieved by planned zoning and
19 infrastructure capacity.

20 STEP 5. The GMPC or its successor shall establish a monitoring and benchmarks
21 program to assess progress in meeting Countywide Planning Policies.

22 a. The GMPC or its successor shall establish a growth management monitoring
23 advisory committee which shall recommend information to be reported annually to serve as
24 indicators and benchmarks for growth management policies. The annual reporting shall
25 incorporate the economic development policy indicators developed by the Fiscal and Economic
26 Development Task Force and other indicators as adopted by the GMPC, and shall consider
27 housing indicators specified in policy AH-5. The GMPC or its successor shall adopt a
28 monitoring program and report the adopted growth management benchmarks annually.

29 b. The GMPC or its successor should conduct a comprehensive evaluation to
30 assess progress on countywide policies. The evaluation should be initiated as indicated by
31 results of the monitoring program, but no earlier than five years after adoption of the Phase 2
32 Amendments to the Countywide Planning Policies. The evaluation shall include opportunities
33 for public involvement.

34 c. The citizens and jurisdictions of King County are committed to maintaining a
35 permanent rural area. The GMPC or its successor shall review all Urban Growth Areas 10

1 years after the adoption and ratification of Phase 2 Amendments to the Countywide Planning
2 Policies. As a result of this review the GMPC or its successor may amend the Urban Growth
3 Areas based on an evaluation of, but not limited to, the following factors:

4 -- the criteria in policies LU-14 and LU-15

5 -- the sufficiency of vacant, developable land and redevelopable land to meet
6 project needs;

7 -- the actual and projected rate of development and land consumption by
8 category of land use;

9 -- the capacity of appropriate jurisdictions to provide infrastructure and
10 service to the Urban Growth Areas;

11 -- the actual and projected progress of jurisdictions in meeting their adopted
12 20-year goals and targets of number of households and employees per acre;

13 -- the actual and projected rate of population and employment growth
14 compared to adopted 20-year goals and targets, and compared to revised projections from the
15 office of financial management;

16 -- the actual and projected trend of economic development and affordable
17 housing indicators, as monitored and evaluated by the GMPC or its successor.

18 -- indicators of environmental conditions, such as air quality, water quality,
19 wildlife habitat, and others.

20 d. Amendments to the Countywide Planning Policies shall be subject to
21 ratification by at least thirty percent of the city and county governments representing seventy
22 percent of the population in King County.

23 FW-2. Countywide Planning Policies are effective after King County adoption and city
24 ratification for the purposes of updating comprehensive plans, and providing a policy
25 framework for other governmental actions of all jurisdictions. Significant planning options will
26 be precluded if interim actions are not taken to assure capacity and direct growth in the Urban
27 area, and to protect the Rural area from the impacts of growth. The following interim actions
28 will be taken by all jurisdictions no later than one month after ratification.

29 a. King County shall adopt interim rural zoning consistent with the designation of
30 rural for the "new" Rural area adopted through the Countywide Planning Policies to ensure
31 rural character is not threatened by additional subdivision activity.

32 b. All jurisdictions in the Urban area will adopt interim minimum density
33 ordinances and review and, where appropriate, remove regulatory barriers to accessory
34 dwelling units and manufactured homes on individual lots, to ensure that urban land is used
35 efficiently.

1 c. Jurisdictions shall not expand the existing land area zoned for business/office
2 parks.

3 **NEW FW-4** The final adopted targets shall be monitored by Metropolitan King
4 County annually with adjustments made by the GMPC or its successor organization every six
5 years utilizing the process established by FW-3.

6 **I. CRITICAL AREAS**

7 *Most jurisdictions in King County have sensitive areas ordinances in place or under*
8 *development. These regulations are tailored to the specific needs of each jurisdiction and are*
9 *not likely to be modified based on another jurisdiction's regulations. It is important to*
10 *promote regional policies that do not erode existing regulations while providing guidance for*
11 *achieving consistency and compatibility among them.*

12 **A. Overall Environmental Protection**

13 FW-3. All jurisdictions shall protect and enhance the natural ecosystems through com-
14 prehensive plans and policies, and develop regulations that reflect natural constraints and
15 protect sensitive features. Land use and development shall be regulated in a manner which
16 respects fish and wildlife habitat in conjunction with natural features and functions, including
17 air and water quality. Natural resources and the built environment shall be managed to protect,
18 improve and sustain environmental quality while minimizing public and private costs.

19 FW-4. Puget Sound, floodplains, rivers, streams and other water resources shall be
20 managed for multiple beneficial uses including flood and erosion hazard reduction, fish and
21 wildlife habitat, agriculture, open space, water supply, and hydropower. Use of water
22 resources for one purpose shall, to the fullest extent possible, preserve and promote
23 opportunities for other uses.

24 **B. Wetlands Protection**

25 CA-1. All jurisdictions shall use as minimum standards, the 1989 Federal Manual for
26 Identifying and Delineating Jurisdictional Wetlands and reference the 1989 manual in their
27 wetlands protection ordinances.

28 CA-2. In the long term, all jurisdictions shall work to establish a single countywide
29 classification system for wetlands.

30 CA-3. Within each basin, jurisdictions shall formulate their regulations and other
31 non-regulatory methods to accomplish the following: protection of wetlands; assure
32 no-net-loss of wetland functions; and an increase of the quantity and quality of the wetlands.
33 The top class wetlands shall be untouched.

34 CA-4. Implementation of wetland mitigation should be flexible enough to allow for
35 protection of systems or corridors of connected wetlands. A tradeoff of small, isolated

wetlands in exchange for a larger connected wetland system can achieve greater resource protection and reduce isolation and fragmentation of wetland habitat.

C. Aquifers

Currently, there are five Ground Water Management Plans (~~underway~~) being prepared in King County: Redmond, Issaquah, East King County, South King County, and Vashon. Most, but not all, important aquifers are contained within these areas. The state Department of Ecology has designated Seattle-King County Department of Public Health as the lead agency. Each plan is prepared in conjunction with an advisory committee with representatives from suburban cities, water utilities, businesses, private well owners, environmental groups, and state agencies. The plans will identify aquifer recharge areas and propose strategies for protection of aquifers (~~groundwater~~) through preservation and protection of groundwater (~~aquifers~~). Local governments are required to adopt or amend regulations, ordinances, and/or programs in order to implement the plans following certification by Ecology in accordance with WAC 173-100-120.

CA-5. All jurisdictions shall adopt policies (~~regulations~~) to protect the quality and quantity of groundwater where appropriate:

a. Jurisdictions that are included in Ground Water Management Plans shall support the development, adoption, and implementation of the Plans; and

b. The Seattle-King County Department of Public Health and affected jurisdictions shall develop countywide policies outlining best management practices within aquifer recharge areas to protect public health; and

c. King County and groundwater purveyors including cities, special purpose districts, and others should jointly:

1. Prepare groundwater recharge area maps using common criteria and incorporating information generated by Ground Water Management Plans and purveyor studies;

2. Develop a process by which land use jurisdictions will review, concur with, and implement, as appropriate, purveyor Wellhead Protection Programs required by the Federal Safe Drinking Water Act;

3. Determine which portions of mapped recharge areas and Wellhead Protection Areas should be designated as critical; and

4. Update critical areas maps as new information about recharge areas and Wellhead Protection Areas becomes available.

NEW CA-6 Land use actions should take into account the potential impacts on aquifers determined to serve as water supplies. The depletion and degradation of aquifers

1 needed for potable water supplies should be avoided or mitigated; otherwise a proven, feasible
2 replacement source of water supply should be planned and developed to compensate for
3 potential lost supplies.

4 **D. Fish and Wildlife Habitat**

5 CA-6. Adjacent jurisdictions shall identify and protect habitat networks that are
6 aligned at jurisdictional boundaries. Networks shall link large protected or significant blocks
7 of habitat within and between jurisdictions to achieve a continuous countywide network.
8 These networks shall be mapped and displayed in comprehensive plans.

9 CA-7. All jurisdictions shall identify critical fish and wildlife habitats and species and
10 develop regulations that:

- 11 a. Promote their protection and proper management; and
12 b. Integrate native plant communities and wildlife with other land uses where
13 possible.

14 CA-8. Natural drainage systems including associated riparian and shoreline habitat
15 shall be maintained and enhanced to protect water quality, reduce public costs, protect fish and
16 wildlife habitat, and prevent environmental degradation. Jurisdictions within shared basins
17 shall coordinate regulations to manage basins and natural drainage systems which include
18 provisions to:

- 19 a. Protect the natural hydraulic and ecological functions of drainage systems,
20 maintain and enhance fish and wildlife habitat, and restore and maintain those natural functions;
21 b. Control peak runoff rate and quantity of discharges from new development to
22 approximate pre-development rates; and
23 c. Preserve and protect resources and beneficial functions and values through
24 maintenance of stable channels, adequate low flows, and reduction of future storm flows,
25 erosion, and sedimentation.

26 CA-9. Jurisdictions shall maintain or enhance water quality through control of runoff
27 and best management practices to maintain natural aquatic communities and beneficial uses.

28 CA-10. The Washington State Departments of Fisheries and Wildlife and the Indian
29 Tribes both manage fish and wildlife resources. However, local governments have authority
30 for land use regulation. Jurisdictions shall coordinate land use planning and management of
31 fish and wildlife resources with affected state agencies and the federally recognized Tribes.

32 **E. Frequently Flooded Areas**

33 *The State adopted comprehensive flood legislation in 1991 (Senate Bill 5411) that*
34 *makes the GMA requirement for coordination and consistency on flood hazard regulations*
35 *much more explicit. According to the new legislation, counties are to develop flood hazard*

1 *control management plans with the full participation of jurisdictions within the planning*
2 *areas. Once adopted by the county, cities within flood hazard planning areas must comply*
3 *with the management plan. The draft Countywide Flood Hazard Reduction Plan is currently*
4 *being reviewed by affected jurisdictions before transmittal to the King County Council for*
5 *consideration and adoption.*

6 CA-11. All jurisdictions shall adopt and implement the relevant general and land use
7 policies of the Flood Hazard Reduction Plan and develop appropriate regulations for imple-
8 mentation and enforcement of the Plan. Regulations shall:

- 9 a. Reduce flood impacts on existing development by reducing risk and regulating
10 new development;
11 b. Reduce long term public and private costs;
12 c. Protect natural flood storage and conveyance functions; and
13 d. Develop an enforcement program.

14 **F. Geologic Hazard Areas**

15 CA-12. All jurisdictions shall regulate development on certain lands to protect public
16 health, property, important ecological and hydrogeologic functions, and environmental quality,
17 and to reduce public costs. The natural features of these lands include:

- 18 a. Slopes with a grade greater than 40%;
19 b. Severe landslide hazard areas;
20 c. Erosion hazard areas;
21 d. Mine hazard areas; and
22 e. Seismic hazards.

23 Regulations shall include, at a minimum, provisions for vegetation retention, seasonal
24 clearing and grading limits, setbacks, and drainage and erosion controls.

25 **G. Air and Water Quality**

26 CA-13. All jurisdictions, in coordination with the Puget Sound Air Pollution Control
27 Agency and the Puget Sound Regional Council, shall develop policies, methodologies and
28 standards that promote regional air quality, consistent with the Countywide Policy Plan.

29 CA-14. All jurisdictions shall implement the Puget Sound Water Quality Management
30 Plan to restore and protect the biological health and diversity of the Puget Sound Basin.

31 **H. Implementation**

32 CA-15. King County shall establish a technical committee to facilitate environmental
33 protection which is to include representatives of the county, the cities, the federally recognized
34 Tribes, business community, environmental community, public utilities, special districts, and

1 interested citizens. The committee will serve as a depository of regulations and policies
2 adopted by jurisdictions in King County.

3 Based on information provided by all jurisdictions, the committee shall prepare a report
4 by December 1993 which addresses consistency and compatibility of regulations and
5 designations, cumulative impacts, and education programs. The report should be designed to
6 assist jurisdictions in developing permanent regulations with optimal consistency among the
7 jurisdictions.

8 II. LAND USE PATTERN

9 A. Resource Lands: Agricultural, Forestry, and Mineral

10 *The protection and management of resource lands in King County is a regional*
11 *concern and a major objective of the countywide planning policies. The vast majority of*
12 *resource lands are located in unincorporated King County. These areas were identified and*
13 *protected under the 1985 King County Comprehensive Plan and subsequent community plans*
14 *and regulations.*

15 FW-5. The land use pattern for the County shall protect the natural environment by
16 reducing the consumption of land and concentrating development. Urban Growth Areas, Rural
17 Areas, and Resource Lands shall be designated and the necessary implementing regulations
18 adopted. This includes Countywide establishment of a boundary for the Urban Growth Area.
19 Local jurisdictions shall establish these land use designations, based on the Countywide
20 Planning Policies.

21 LU-1. Agricultural and forest lands are protected primarily for their long-term
22 productive resource value. However, these lands also provide secondary benefits such as open
23 space, scenic views and wildlife habitat. All jurisdictions should encourage utilization of
24 natural resources through methods that minimize the impacts on these secondary benefits.
25 Resource lands also contain an abundance of critical areas that shall be protected in accordance
26 with adopted State and local regulations.

27 LU-2. All jurisdictions shall protect existing resource lands within their boundaries
28 that have long-term commercial significance for resource production. Any designated
29 agricultural and forestry lands shall not be considered for urban development. Jurisdictions are
30 required to enact a program authorizing the transfer or purchase of development rights for
31 designated forest or agricultural areas within Urban Growth Areas. At the request of any city,
32 King County will work to reinstate the King County Purchase of Development Rights Program
33 and/or establish an interjurisdictional transfer of development rights program to protect these
34 resource lands in accordance with the GMA.

1 LU-3. Existing mineral extractive and processing operations or designated sites may
2 be annexed or incorporated to a city only if there are policies and regulations in place to
3 protect the long term viability for continued operation and ensure adequate reclamation and
4 enhancement of the site once operation ceases.

5 LU-4. All jurisdictions shall encourage compatible land uses adjacent to natural
6 resource areas which support utilization of the resource and minimize conflicts among uses.
7 Each jurisdiction is responsible for implementing the plat and permit notification requirements
8 for properties within 300 feet of the resource land, as specified in RCW 36.70A as amended.
9 Jurisdictions will consider an increased distance for notification and notification to titles to
10 property within or adjacent to the resource lands.

11 LU-5. All jurisdictions shall require mineral extraction and processing operations and
12 agricultural practices to implement best management practices to reduce environmental
13 impacts and mitigate any unavoidable impacts.

14 **B. Rural Areas**

15 *The vast majority of rural areas are located in unincorporated King County. These*
16 *areas were identified and regulated through the 1985 King County Comprehensive Plan and*
17 *subsequent community plans and regulations. While counties are the jurisdictions specified*
18 *by the GMA as responsible for designating and regulating rural areas through their*
19 *comprehensive plans, the protection of King County's rural area is a regional issue and a*
20 *fundamental objective of the countywide planning policies.*

21 FW-6. Urban Growth Areas, Rural Areas, and Resource Lands shall be designated
22 and the necessary implementing regulations adopted. This includes Countywide establishment
23 of an Urban Growth Area. Local jurisdictions shall establish these land use designations, based
24 on the Countywide Planning Policies.

25 FW-7. All jurisdictions acknowledge that rural areas provide an overall benefit for all
26 residents of King County. Strategies to fund infrastructure and services in rural areas may be
27 needed to support a defined rural level of service. Towns and cities in the rural areas play an
28 important role as ~~((local))~~ trade and community centers.

29 FW-RUa A fundamental component of the countywide planning strategy is the
30 maintenance of the traditional character of the Rural Area with its mix of forests, farms, high-
31 quality natural environment, rural cities, unincorporated rural centers, and variety of low-den-
32 sity residential uses. The basic elements of this rural character are:

33 a. NATURAL FEATURES such as water bodies and significant wetlands,
34 scenic resources and habitat areas should be afforded long-term protection, minimizing long-

1 term environmental degradation, and enhancing environmental quality where previous degra-
2 dation has occurred.

3 b) RESOURCE-BASED INDUSTRIES Commercial and non-commercial
4 farming, forestry, primary forest products manufacturing, mining and fisheries activities shall
5 be encouraged to continue and to expand as possible;

6 c. RURAL TOWNS Valued attributes of small towns such as: public safety;
7 historical continuity; small, independent business; and local availability of goods and services
8 shall be encouraged to continue.

9 d) RURAL INFRASTRUCTURE AND SERVICES Rural residents outside
10 cities should anticipate lower levels of public services and infrastructure than those available in
11 urban areas, maximizing self-sufficiency and independence.

12 e. OPEN SPACE SYSTEM Significant components of King County's Open
13 Space System are found in Rural Areas. Trail corridors, habitat networks, recreational areas
14 and scenic resources should be linked wherever possible to complete the system. Active rec-
15 reational facilities shall be rural in character. Where a traditional landscape of fields cleared for
16 agricultural purposes exists, new development should be clustered at the edges of fields to
17 minimize the consumption of agricultural land and possible conflicts with current or future
18 farming activity.

19 f) RURAL HOUSING The Rural Areas shall offer important alternative and
20 qualitative housing choices but shall not be considered a quantitatively significant part of the
21 county's residential growth capacity;

22 g) RURAL ECONOMY The Rural Areas make a unique contribution to King
23 County's economy. In addition to farming, fisheries and forestry, cottage industries shall be
24 recognized as making a significant economic contribution in Rural Areas, and should be
25 encouraged.

26 h) CITIES Rural cities shall encourage, where appropriate, business opportu-
27 nities which support the full range of rural activities occurring in their adjacent Rural Areas,
28 including support services for agriculture and forestry. Cities should also provide a place for
29 shopping, education, social services and other community functions at a scale consistent with
30 the maintenance of rural character as well as the cities' target population and employment
31 numbers.

32 FW-RUb To achieve and maintain rural character King County, and the cities as
33 appropriate, shall use a range of tools including, at a minimum: land use designations, devel-
34 opment regulations, level of service standards (particularly for infrastructure), and incentives.

1 LU-6. Through the Countywide Planning Policy process, King County, with
2 the cooperation of the cities, shall be responsible for designating rural areas consistent with
3 GMA. In designating long term rural areas, King County shall foster better use of limited pub-
4 lic funds by allowing service providers to establish distinctly rural facility and service standards.

5 LU-7. Designated rural areas are considered to be permanent and shall not be
6 redesignated to an Urban Growth Area. Future growth should be accommodated by efficient
7 use of existing urban land within the Urban Growth Area. Annexation of rural areas to cities
8 shall be prohibited. When annexation of rural areas is necessary to link two urban areas, that
9 intervening rural area shall be designated as permanent urban separator at low rural densities.

10 RU-1 Retention of resource-based uses and conservation of natural resource
11 lands are important to maintaining the traditional character, environmental functions and values
12 of the Rural Area. King County shall identify appropriate districts within the Rural Area where
13 farming and forestry are to be encouraged and expanded. These districts shall be designated by
14 December 31, 1995. Areas to be considered should include:

15 a) Large blocks of land, either identified by King County or proposed by
16 the property owners, with resource land characteristics or agriculture or forestry production
17 potential;

18 b) Land enrolled in the current use assessment program as farm and agri-
19 cultural land or timber land under RCW 84.34 or enrolled for tax purposes as timber land
20 under RCW 84.33;

21 c) Land in proximity to designated Agriculture and Forest Production Dis-
22 tricts, offering mutual buffering benefits and low potential for conflicts with adjacent uses; and

23 d) Land with valuable environmental features such as wildlife habitat,
24 ground water recharge, salmonid streams, or high-value wetlands.

25 RU-2 Permitted land uses within designated Rural Area farming and forestry
26 districts should be limited to residences at very low densities and farming or forestry-related
27 uses. Institutional uses or public facilities should not be permitted except for the siting of util-
28 ity lines where no feasible alternative exists and the siting of K-12 public schools and K-12
29 public school facilities in conjunction with K-12 Public Schools. Development of adjacent
30 lands should be conditioned to minimize land use conflicts and conversion pressures upon these
31 districts.

32 RU-3 The Rural Area shall have low densities which can be sustained by minimal
33 infrastructure improvements, such as septic systems and rural roads. King County, cities adja-
34 cent to Rural Areas, and other agencies providing services to Rural Areas, shall adopt stan-
35 dards for facilities and services in Rural Areas that protect basic public health and safety, and

1 enhance the environment, but urban facilities and services should not be provided to Rural
2 Areas.

3 RU-4 Comprehensive plans covering nearby Urban Areas shall consider the
4 potential impacts of urban development upon the adjacent Rural Area. Development in Urban
5 Areas shall not significantly increase peak flows or pollution in Rural Area streams. Urban-
6 generated traffic should not cause rural roads to be upgraded to urban standards. Where a
7 rural arterial must be upgraded to accommodate urban-generated traffic, it should include fea-
8 tures such as screening and limited access within the Rural Area to lessen the road's impact on
9 surrounding rural lands, including pressure to convert them to higher-intensity uses. Funding
10 for such improvements should be primarily the responsibility of the benefiting jurisdiction.

11 RU-5 Planning for Rural Areas should comply with the following density
12 guidelines:

13 a) one home per 20 acres to protect forest lands when designated in accor-
14 dance with Policy RU-1.

15 b) one home per 10 acres to protect lands for small-scale farming when
16 designated in accordance with Policy RU-1;

17 c) one home per 10 acres is also appropriate if the predominant lot size is
18 10 acres or larger and the lands within one-quarter of a mile of a designated Forest Production
19 District or lower-density Agricultural Production District with livestock-based agriculture or a
20 legally-approved long-term mineral resource extraction site or, the lands contain significant
21 environmentally constrained areas as defined by county ordinance or federal or state law;

22 d) one home per 5 acres where the land is physically suitable and can be
23 supported by rural services, and

24 e) development on existing sub-standard lots in the Rural Area shall be
25 permitted when applicable development standards, such as Board of Health regulations for
26 on-site sewage disposal, can be met.

27 RU-6 To maintain rural character, and to minimize the need for additional infrastruc-
28 ture, very large lots (five acres or more) are the preferred residential development pattern. To
29 further the goals of rural protection, clustering of development that will sustain rural land uses,
30 require only rural levels of service and be designed, scaled and sited to be consistent with Rural
31 Area character may be required

32 a. where it would not result in a greater number of dwelling units than would be
33 constructed under a conventional lotting pattern unless either:

34 1. a substantial dedication of land to King County's Open Space System is
35 provided and the impacts of the additional dwelling units are mitigated;

1 2. permanent protection, substantially greater than that attainable through
2 existing regulations, is secured for a significant natural resource, or

3 3. substantial farming or forestry lands would be permanently protected
4 from conversion to non-resource based uses.

5 b. where clustering of development would:

6 1. provide greater protection for natural resources or environmentally sensi-
7 tive features;

8 2. reduce the consumption of agricultural or forestry lands for residential
9 purposes; or

10 3. minimize potential conflicts between residential and resource-based
11 activities.

12 RU-7 King County may allow transfer of density from Rural Area properties
13 to other Rural or Urban Area properties in order to (1) secure a substantial dedication of sig-
14 nificant land to the King County Open Space System; (2) provide permanent protection which
15 is greater than that available through existing regulation to a significant natural resource; or
16

1 (3) encourage retention of resource-based uses in the Rural Area. The county shall
2 develop a mechanism to accomplish these objectives and provide that:

3 a) lands dedicated are first determined to be suitable for inclusion within
4 the King County Open Space System;

5 b) the protected natural resource is first determined to be of significance to
6 King County citizens and the protection afforded is materially superior to that provided by
7 existing regulations;

8 c) the resulting development is located in proximity to the lands to be dedi-
9 cated to public ownership or where it can otherwise be shown that the residents of this devel-
10 opment will share in an overriding public benefit to be derived from the preservation of the
11 dedicated lands or the protection of the natural resource;

12 d) the resulting development within the Rural Area maintains rural charac-
13 ter; and

14 e) there shall be no net increase in density within the Rural Area as a result
15 of this density transfer.

16 RU-8 Rural Areas should retain a high proportion of undisturbed soils to maintain
17 ground water recharge, high water quality and river and stream base flows essential to naviga-
18 tion, recreation and the survival of wildlife and fish. The long-term integrity of Rural Area
19 ecosystems should be a guiding principle in establishing the location and intensity of land uses
20 and public facilities in Rural Areas, the operating standards for resource-based activities, and
21 rural facility standards.

22 RU-9 Rural development standards should be designed to protect the natural envi-
23 ronment. The tools to achieve this include: seasonal and maximum clearing limits; impervious
24 surface limits; surface water management standards that emphasize preservation of natural
25 drainage systems and water quality, ground water recharge and best management practices for
26 resource-based activities.

27 RU-10 Rural Areas shall be recognized as significant for the recharge and storage of
28 groundwater and as areas necessary for the maintenance of base flows in rivers and natural
29 levels of lakes and wetlands. Measures to protect these areas shall include:

30 a) A rural section within the King County Surface Water Design Manual
31 requiring runoff be infiltrated except where potential groundwater contamination cannot be
32 prevented by pollution source controls and stormwater pretreatment, and

33 b) infiltration as the preferred method of volume control, with other meth-
34 ods allowable only after infiltration has been ruled out for technical reasons.

1 RU-11 King County's Comprehensive Plan shall include policies to preserve opportuni-
2 ties for mining and to assure extractive industries maintain environmental quality and minimize
3 impacts to adjacent land uses. The goal shall be to facilitate the efficient utilization of valuable
4 mineral, oil and gas deposits when consistent with maintaining environmental quality and
5 minimizing impacts.

6 RU-13 Rural level standards for streets should be refined to minimize clearing
7 and grading, and avoid conflicts with the natural landscape. Pavement width should be no
8 wider than needed to meet safety considerations and accommodate designated bicy-
9 cle/pedestrian routes.

10 RU-15 Standards for rural water service, to be developed through the rural
11 design manual, should assure adequate quality and quantity for domestic supply consistent with
12 low rural residential densities and existing infrastructure commitments.

13 RU-16 Regional public facilities which directly serve the public shall be
14 discouraged from locating in rural areas.

15 RU-17 King County should evaluate additional ways that small-scale farming
16 and forestry, and land and watershed stewardship can be encouraged through landowner
17 incentive programs and community-based education. This should include:

18 a) creating opportunities and incentives for voluntary cooperative man-
19 agement of woodlots and open space that is currently in separate ownerships;

20 b) providing technical assistance and information to landowner groups and
21 community associations seeking to implement stewardship, habitat restoration and
22 management plans;

23 c) providing outreach and assistance to small landowners wishing to par-
24 ticipate in open space tax incentive programs;

25 d) ongoing evaluation of existing tax incentive programs, including the
26 County's Public Benefit Rating System and the timber and agricultural current use assessment
27 programs, to ensure they meet the needs of rural character preservation;

28 e) implementation of "right to farm" and "right to forestry" ordinances;

29 f) development of expedited permit review processes and/or permit
30 exemptions for activities complying with cooperatively developed stewardship, habitat restora-
31 tion and resource management plans that include "best management practices".

32 g) cooperation with State and Tribal Agencies in expediting regulatory
33 review and technical assistance to cooperating landowners.

1 ~~((LU 8. Designated rural areas shall have low densities which can be sustained~~
2 ~~by minimal infrastructure improvements, such as septic systems and rural roads, without~~
3 ~~degrading the environment or creating the necessity for urban level of services.))~~

4 ~~((LU 9. The GMPC shall establish a subcommittee to develop an outcomes-~~
5 ~~based policy recommendation on the definition of rural character and incentives for protection~~
6 ~~of rural areas. The subcommittee shall have proportional representation from King County,~~
7 ~~Seattle and suburban cities and shall make its report to the GMPC by October 1, 1992. The~~
8 ~~definition shall consider rural densities, clustering and other tools to protect rural character.~~
9 ~~Incentives to be considered include:))~~

10 ~~a. Assess land in rural areas on its current use;~~

11 ~~b. Facilitate small land owners qualifying land for special categories such as for-~~
12 ~~est, wetlands, riparian zones;~~

13 ~~c. Develop programs for direct marketing of produce in urban areas;~~

14 ~~d. Reinforce right to farm and forest practices in rural areas; and/or~~

15 ~~e. Develop services through existing agencies with rural expertise.~~

16 LU-10. Rural areas designated by King County shall remain rural. Additional rural
17 areas shall be designated by King County through adoption of a land use map authorized by the
18 Growth Management Planning Council. These additional areas meet at least one of the follow-
19 ing criteria:

20 a. Opportunities exist for small scale farming and forestry which do not qualify
21 for resource land designation;

22 b. The rural designation serves as a buffer for designated resource lands or sen-
23 sitive areas;

24 c. Significant environmental constraints make the area generally unsuitable for
25 intensive urban development;

26 d. Major physical barriers exist to providing urban services at reasonable cost;

27 e. The area is contiguous to other designated rural areas, resource areas or sen-
28 sitive areas;

29 f. The area has outstanding scenic, historic, and/or aesthetic value that can best
30 be protected by rural land uses and densities; and

31 g. The area has limited public services, extension of full services is not planned,
32 and infill at higher densities is not feasible or necessary to meet regional goals.

33 *Criteria specified in LU-10(g) permits the redesignation of urban lands in King*
34 *County to rural. These areas have not received a full range of services, such as sewers, and*
35 *are developed at densities which are too low to support cost-effective provision of all urban*

services. The inclusion of these new rural areas will carry out regional policies by focusing new development to urban areas that are planned to have full urban services.

LU-11. Low-density urban areas meeting the criteria of LU-10(g) (~~shall~~) may be redesignated rural and zoned for rural residential densities. Legally created existing lots within the rural area are legal building sites as authorized in the King County Code.

~~((LU 12. To maintain rural character, and to minimize the need for additional infrastructure, while maximizing undeveloped land available for traditional rural uses, clustering of new development shall be required on all existing parcels of contiguous ownership of ten or more acres, provided that clustering shall be designed and sealed to be consistent with rural area character.))~~

RU-19 King County, in collaboration with affected governments, agencies and citizens shall prepare the following products:

a) a manual on rural infrastructure design (including an examination of alternative sewage treatment technologies), fire/wildfire protection, and service standards;

b) recommended revisions to King County's land development regulations to address issues such as incentives for reconsolidation of nonconforming and unbuildable lots, application of current regulations if discretionary extensions of preliminary plat approvals are allowed, and subdivision site design to minimize conflict with nearby farming and forestry activities;

c) a strategy to persuade the banking industry and its regulators to revise lending criteria to remove obstacles to affordable housing on large lots, and to invest in environmentally sound land management practices; and

d) a strategy to persuade the federal and state governments to devise domestic water quality standards and monitoring requirements that protect the environment and public health at a reasonable cost so as to avoid financial pressure to convert Rural Areas to higher densities.

~~((LU 13. King County, cities that are adjacent to or are surrounded by rural designated areas, and other agencies that provide services to rural areas shall form a technical committee to prepare a manual on rural infrastructure design, fire/wildfire protection, and service standards.))~~

C. Urban Areas

The following policies establish an Urban Growth Area (UGA) and methods to phase development within this area in order to bring certainty to long-term planning and development within the county. The Urban Growth Area is a permanent designation. Land outside the Urban Growth Area is designated for permanent rural and resource uses, except

for the cities in the rural area. Countywide policies on rural and resource areas are found in Chapter IIA, Resource Lands, and Chapter IIIB, Rural Areas.

The capacity in the Urban Growth Area for growth, based on adopted plans and regulations, exceeds the 20-year minimum requirement of the GMA according to the current population forecasts. In the future, all urban growth is to be accommodated within permanent urban areas by increasing densities. Phasing is to occur within the Urban Growth Area to ensure that services are provided as growth occurs. All cities are to be within the Urban Growth Area. Cities in the rural area are to be UGA islands.

FW-8. The land use pattern for King County shall protect the natural environment by reducing the consumption of land and concentrating development. An Urban Growth Area, Rural Areas, and Resource Lands shall be designated and the necessary implementing regulations adopted. This includes countywide establishment of a boundary for the Urban Growth Area. Local jurisdictions shall make land use decisions based on the Countywide Planning Policies.

FW-9. The Urban Growth Area shall provide enough land to accommodate future urban development. Policies to phase the provision of urban services and to ensure efficient use of the growth capacity within the Urban Growth Area shall be instituted.

1. Urban Growth Area

The GMA requires King County to designate an Urban Growth Area (UGA) in consultation with cities. The Countywide Planning Policies must establish an Urban Growth Area that contains enough urban land to accommodate at least 20 years of new population and employment growth. The GMA states: "based upon the population forecast made for the county by the Office of Financial Management, the Urban Growth Areas in the county shall include areas and densities sufficient to permit urban growth that is projected to occur in the county for the succeeding twenty-year period. Each Urban Growth Area shall permit urban densities and shall include greenbelt and open space areas." A UGA map is attached.

LU-14. The lands within ((the)) Urban Growth Areas (UGA) shall be characterized by urban development. The UGA shall accommodate at least the 20-year projection of population and employment growth with a full range of phased urban governmental services. The Countywide Planning Policies shall establish the Urban Growth Area based on the following criteria:

a. Include all lands within existing cities, including cities in the rural area and their designated expansion areas;

b. The GMPC recognizes that the Bear Creek Master Plan Developments (MPDs) are subject to an ongoing review process under the adopted Bear Creek Community

Plan and recognizes these properties as urban under these Countywide Planning Policies. If the applications necessary to implement the MPDs are denied by King County or not pursued by the applicant(s), then the property subject to the MPD shall be redesignated rural pursuant to the Bear Creek Community Plan. Nothing in these Planning Policies shall limit the continued review and implementation through existing applications, capital improvements appropriations or other approvals of these two MPDs as new communities under the Growth Management Act.

c. Not include rural land or unincorporated agricultural, or forestry lands designated through the Countywide Planning Policies plan process;

d. Include only areas already characterized by urban development which can be efficiently and cost effectively served by roads, water, sanitary sewer and storm drainage, schools and other urban governmental services within the next 20 years;

e. Do not extend beyond natural boundaries, such as watersheds, which impede provision of urban services;

f. Respect topographical features which form a natural edge such as rivers and ridge lines; and

g. Include only areas which are sufficiently free of environmental constraints to be able to support urban growth without major environmental impacts unless such areas are designated as an urban separator by interlocal agreement between jurisdictions.

LU-15. Urban separators are low density areas or areas of little development (~~and must be~~) within the Urban Growth Area. Urban separators shall be defined as permanent low density lands which protect adjacent resource lands, rural areas, and environmentally sensitive areas and create open space corridors within and between urban areas which provide environmental, visual, recreational and wildlife benefits. (~~These lands~~) Designated urban separators shall not be redesignated in the future (in the 20 year planning cycle) to other urban uses or higher densities. The maintenance of these urban separators is a regional as well as a local concern. Therefore, no modifications should be made to the development regulations governing these areas without county review and concurrence.

2. Phasing Development within the Urban Growth Area

Development in the urban area will be phased to promote efficient use of the land, add certainty to infrastructure planning, and to ensure that urban services can be provided to urban development. The minimum densities required by LU-51 help ensure the efficient use of the land. Phasing will further ensure coordination of infrastructure and development. Urban areas in jurisdictions which do not have urban services and are not scheduled to receive urban services within 10 years shall be subject to phasing requirements.

1 LU-16. Within the Urban Growth Area, growth should be directed as follows: a) first,
2 to centers and urbanized areas with existing infrastructure capacity; b) second, to areas which
3 are already urbanized such that infrastructure improvements can be easily extended; and c) last,
4 to areas requiring major infrastructure improvements.

5 LU-17. All jurisdictions shall develop growth phasing plans consistent with applicable
6 capital facilities plans to maintain an urban area served with adequate public facilities and
7 services to maintain an urban area to meet at least the six year intermediate population and
8 employment targets. ~~((by identifying areas for growth for the next ten and the next twenty~~
9 ~~years where necessary urban services can be provided.))~~ These growth phasing plans shall be
10 based on locally adopted definitions, service levels, and financing commitments, consistent with
11 State GMA requirements. The ~~((ten and twenty year growth))~~ phasing plans for cities shall not
12 extend beyond their Potential Annexation Areas. Interlocal agreements shall be developed that
13 specify the applicable minimum zoning, development standards, impact mitigation and future
14 annexation for the Potential Annexation Areas.

15 LU-18. Where urban services cannot be provided within the next 10 years,
16 jurisdictions should develop policies and regulations to:

17 a. Phase and limit development such that planning, siting, densities and
18 infrastructure decisions will support future urban development when urban services become
19 available; and

20 b. Establish a process for converting land to urban densities and uses once
21 services are available.

22 **3. Joint Planning and Urban Growth Areas around Cities**

23 *The GMA requires each county to designate Urban Growth Areas, in consultation*
24 *with cities. Within the countywide Urban Growth Area, each city will identify land needed for*
25 *its growth for the next twenty years. Although the GMA does not explicitly equate Urban*
26 *Growth Areas with municipal annexation areas, the Urban Growth Areas around cities may*
27 *be considered potential expansion areas for cities.*

28 FW-10. Cities are the appropriate provider of local urban services to urban areas either
29 directly or by contract. Counties are the appropriate provider of most countywide services.
30 Urban services shall not be extended through the use of special purpose districts without the
31 approval of the city in whose potential annexation area the extension is proposed. Within the
32 urban area, as time and conditions warrant, cities should assume local urban services provided
33 by special purpose districts.

34 LU-19. In collaboration with adjacent counties and cities and King County, and in
35 consultation with residential groups in affected areas, each city shall designate a potential

1 annexation area. Each potential annexation area shall be specific to each city. Potential
2 annexation areas shall not overlap. Within the potential annexation area the city shall adopt
3 criteria for annexation, including conformance with Countywide Planning Policies, and a
4 schedule for providing urban services and facilities within the potential annexation area. This
5 process shall ensure that unincorporated urban islands of King County are not created between
6 cities and strive to eliminate existing islands between cities.

7 LU-20. A city may annex territory only within its designated potential annexation area.
8 All cities shall phase annexations to coincide with the ability for the city to coordinate the
9 provision of a full range of urban services to areas to be annexed.

10 LU-21. Land within a city's potential annexation area shall be developed according to
11 that city's and King County's growth phasing plans. Undeveloped lands adjacent to that city
12 should be annexed at the time development is proposed to receive a full range of urban
13 services. Subsequent to establishing a potential annexation area, infill lands within the
14 potential annexation area which are not adjacent or which are not practical to annex shall be
15 developed pursuant to interlocal agreements between the County and the affected city. The
16 interlocal agreement shall establish the type of development allowed in the potential annexation
17 area and standards for that development so that the area is developed in a manner consistent
18 with its future annexation potential. The interlocal agreement shall specify at a minimum the
19 applicable zoning, development standards, impact mitigation, and future annexation within the
20 potential annexation area.

21 LU-22. Several unincorporated areas are currently considering local governance
22 options. Unincorporated urban areas that are already urbanized and are within a city's
23 potential annexation area are encouraged to annex to that city in order to receive urban ser-
24 vices. Where annexation is inappropriate, incorporation may be considered.

25 *Development within the potential annexation area of one jurisdiction may have*
26 *impacts on adjacent jurisdictions.*

27 LU-23. A jurisdiction may designate a potential impact area beyond its potential
28 annexation area in collaboration with adjacent jurisdictions. As part of the designation process
29 the jurisdiction shall establish criteria for the review of development proposals under
30 consideration by other jurisdictions in the impact area.

31 *The GMA has a provision granting counties the discretion to disband the Boundary*
32 *Review Boards after comprehensive plans and development regulations are adopted. The*
33 *following policy provides direction for considering whether to disband the Boundary Review*
34 *Board for King County.*

1 LU-24. Upon the adoption and ratification of the Countywide Policies, the King
2 County Council shall convene a meeting with municipal elected officials to determine a process
3 for disbanding the Washington State Boundary Review Board for King County and
4 establishing criteria to oversee municipal and special district annexations, mergers, and
5 incorporations in King County. Until the Washington State Boundary Review Board for King
6 County is disbanded, it should be governed in its decisions by the interim urban growth area
7 boundary and the adopted and ratified countywide planning policies. The criteria shall include,
8 but not be limited to:

- 9 a. Conformance with Countywide Planning Policies;
10 b. The ability of the annexing jurisdiction to demonstrate a capability to provide
11 urban services at standards equal to or better than the current service providers; and
12 c. Annexations in a manner which discourages unincorporated islands of
13 development.

14 *The GMA requires that city and county comprehensive plans be coordinated and*
15 *consistent with one another. Consistency is required "where there are common borders or*
16 *related regional issues" (RCW 36.70A.100). Joint planning is fundamental to all the*
17 *framework policies.*

18 LU-25. All jurisdictions shall cooperate in developing comprehensive plans which are
19 consistent with those of adjacent jurisdictions and with the countywide planning policies.

20 4. Cities in the Rural Area

21 *The cities and unincorporated towns in the rural areas are a significant part of King*
22 *County's diversity and heritage. Cities in this category include: Black Diamond, Carnation,*
23 *Duvall, Enumclaw, North Bend, Snoqualmie and Skykomish. They have an important role as*
24 *local trade and community centers. These cities and towns are the appropriate providers of*
25 *local rural services for the community. They also contribute to the variety of development*
26 *patterns and housing choices within the county. As municipalities, the cities are to provide*
27 *urban services and be located within designated Urban Growth Areas. The urban services,*
28 *residential densities and mix of land uses may differ from those of the large, generally*
29 *western Urban Growth Area.*

30 LU-26. In recognition that cities in the rural area are generally not contiguous to the
31 countywide Urban Growth Area, and to protect and enhance the options cities in rural areas
32 provide, these cities shall be located within an Urban Growth Areas. These Urban Growth
33 Areas generally will be islands separate from the larger Urban Growth Area located in the
34 western portion of the county. Each city in the ~~Rural~~ Area, King County and the GMPC
35 shall work cooperatively to establish an Urban Growth Area for that city. (~~Urban Growth~~)

1 ~~Areas must be approved by the GMPC by January 1, 1993.))~~ The Urban Growth Area for
2 cities in rural areas shall:

- 3 a. Include all lands within existing cities in the rural area;
- 4 b. Be sufficiently free of environmental constraints to be able to support rural
5 city growth without major environmental impacts;
- 6 c. Be contiguous to city limits; and
- 7 d. Have boundaries based on natural boundaries, such as watersheds, topo-
8 graphical features, and the edge of areas already characterized by urban development.
- 9 e) be maintained in large lots at densities of one home per five acres or less with
10 mandatory clustering provisions until such time as the city annexes the area;
- 11 f) be implemented through interlocal agreements among King County, the cities
12 and special purpose districts, as appropriate, to ensure that annexation is phased, nearby open
13 space is protected and development within the Urban Growth Area is compatible with sur-
14 rounding Rural and Resource areas, and
- 15 g) not include designated Forest or Agricultural Production District lands unless
16 the conservation of those lands and continued resource-based use, or other compatible use, is
17 assured.

18 ~~((LU 27. Cities in the rural areas shall include the following characteristics:~~

- 19 ~~a. Shopping, employment, and services for residents, supplies for resources~~
20 ~~industries, including commercial, industrial, and tourism development at a scale that reinforces~~
21 ~~the surrounding rural characteristic;~~
- 22 ~~b. Residential development, including small lot single family, multifamily, and~~
23 ~~mixed use developments; and~~
- 24 ~~c. Design standards that work to preserve the rural, small town character and~~
25 ~~promote pedestrian mobility.~~

26 **D. Urban and Manufacturing/Industrial Centers**

27 *Urban Centers are envisioned as areas of concentrated employment and housing, with*
28 *direct service by high capacity transit, and a wide range of other land uses such as retail,*
29 *recreational, public facilities, parks and open space.*

30 *Urban Centers are designed to 1) strengthen existing communities, 2) promote hous-*
31 *ing opportunities close to employment, 3) support development of an extensive transportation*
32 *system to reduce dependency on automobiles, 4) consume less land with urban development,*
33 *and 5) maximize the benefit of public investment in infrastructure and services, 6) reduce*
34 *costs of and time required for permitting, and 7) evaluate and mitigate environmental*
35 *impacts.*

1 Manufacturing/Industrial Employment Centers are key components of the regional
2 economy. These areas are characterized by a significant amount of manufacturing ~~((or~~
3 ~~other))~~ industrial, or advanced technology employment. They differ from other employment
4 areas, such as Business/Office parks (see FW-13 and LU-58-62), in that a land base and the
5 segregation of major non-manufacturing uses are ~~((is-are))~~ essential elements of their
6 operation.

7 FW-11. Within the Urban Growth Area, a limited number of Urban Centers which
8 meet specific criteria established in the Countywide Planning Policies shall be locally desig-
9 nated. Urban Centers shall be characterized by all of the following:

- 10 a. Clearly defined geographic boundaries
- 11 b. Intensity/density of land uses sufficient to support effective rapid transit;
- 12 c. Pedestrian emphasis within the Center;
- 13 d. Emphasis on superior urban design which reflects the local community;
- 14 e. Limitations on single occupancy vehicle usage during peak hours or commute
15 purposes;
- 16 f. A broad array of land uses and choices within those uses for employees, resi-
17 dents;
- 18 g. Sufficient public open spaces and recreational opportunities; and
- 19 h. Uses which provide both daytime and nighttime activities in the Center.

20 FW-12. Within the Urban Growth Area, the Countywide Planning Policies shall assure
21 the creation of a number of locally ~~((designated))~~ determined Manufacturing/Industrial Centers
22 which meet specific criteria ~~((established in the Countywide Planning Policies will be locally~~
23 ~~designated))~~. The Manufacturing/Industrial Centers ~~((will))~~ shall be ~~((and are))~~ characterized
24 by the following:

- 25 a. Clearly defined geographic boundaries;
- 26 b. Intensity/density of land uses sufficient to support manufacturing, ~~((and))~~
27 industrial and advanced technology uses; ~~((and))~~
- 28 c. Reasonable access to the regional highway, rail, air and/or waterway system
29 for the movement of goods;
- 30 d. Provisions to discourage large office and retail development; and
- 31 e. Fast-track project permitting.

32 FW-13. Urban and Manufacturing/Industrial Centers shall be complemented by the
33 land use pattern outside the centers but within the urban area. This area shall include: urban
34 residential neighborhoods, activity areas, business/office parks, and an urban open space

1 network. Within these areas, future development shall be limited in scale and intensity to
2 support the countywide land use and regional transportation plan.

3 **1. Urban Centers Designation Process**

4 LU-28. The location and number of Urban Centers in King County ~~((will be))~~ were
5 determined through the joint local and countywide adoption process, based on the following
6 steps:

7 a. The Countywide Planning Policies include specific criteria for Urban Centers;

8 b. ~~((By October 1, 1992, local jurisdictions shall determine if they will contain an~~
9 ~~Urban Center(s).))~~ Jurisdictions electing to contain an Urban Center provided ~~((these centers~~
10 ~~will provide))~~ the GMPC with a statement of commitment describing the city's intent and
11 commitment to meet the Centers' criteria defined in these policies and a timetable for the
12 required Centers Programmatic Environmental Impact Statement or identification of existing
13 environmental documentation to be used; and

14 c. The GMPC reviewed the Centers nominated ~~((By December 1, 1992, the~~
15 ~~Growth Management Planning Council shall review and confirm the Centers that are elected))~~
16 by local jurisdictions consistent with Policy FW-1, and the following criteria ~~((or make~~
17 ~~adjustments based on))~~:

18 1) The Center's location in the region and its potential for promoting a
19 countywide system of Urban Centers;

20 2) The total number of centers in the county that can be realized over the
21 next twenty years, based on twenty years projected growth;

22 3) The type and level of commitments that each jurisdiction has identified for
23 achieving Center goals; and

24 4) Review of other jurisdictional plans to ensure that growth focused to
25 Centers is assured.

26 d. The GMPC confirmed the following Urban Centers:

27 Bellevue CBD

28 Federal Way CBD

29 Kent CBD

30 Kirkland Totem Lake

31 Redmond CBD

32 Redmond Overlake

33 Renton CBD

34 Seattle CDD

35 Seattle Center

1 First Hill/Capital Hill

2 University District

3 Northgate

4 SeaTac CBD

5 Tukwila CBD

6 **2. Urban Centers Criteria**

7 LU-29. Each jurisdiction which has designated an Urban Center shall adopt in its
8 comprehensive plan a definition of the urban center which specifies the exact geographic
9 boundaries of the center. All centers shall be up to 1-1/2 square miles of land. Each center
10 shall be zoned to accommodate:

- 11 a. A minimum of 15,000 jobs within 1/2 mile of a transit center;
12 b. At a minimum, an average of 50 employees per gross acre; and
13 c. At a minimum, an average 15 households per gross acre.

14 LU-29a In order to be designated as Urban Centers, jurisdictions shall demonstrate
15 both that an adequate supply of drinking water is available to serve projected growth within
16 the Urban Center and that the jurisdiction is capable of concurrent service to new
17 development.

18 LU-30. Jurisdictions which contain urban centers, in conjunction with METRO, shall
19 identify transit station areas and right-of-way in their comprehensive plan. Station areas shall
20 be sited so that all portions of the Urban Center are within walking distance (one half mile) of a
21 station.

22 LU-31. In order to reserve right-of-way and potential station areas for high-capacity
23 transit or transit hubs in the Urban Centers, jurisdictions shall:

- 24 a. Upon adoption of specific high-capacity transit alignments by METRO, adopt
25 policies to avoid development which would restrict establishment of the high-capacity transit
26 system;
27 b. Preserve right-of-ways controlled by the jurisdiction which are identified for
28 potential transit use; and

- 29 c. Provide METRO an option to acquire property owned by the jurisdiction.

30 LU-32. To encourage transit use, jurisdictions shall establish mechanisms to charge for
31 single-occupancy vehicle parking and/or a limit on the number of off-street parking spaces for
32 each Urban Center, and establish minimum and maximum parking requirements that limit the
33 use of the single-occupant vehicle and develop coordinated plans that incorporate Commuter
34 Trip Reduction guidelines. All plans for Urban Centers shall encourage bicycle travel and
35 pedestrian activity.

1 LU-33. Jurisdictions' comprehensive plans for Urban Centers shall demonstrate
2 compliance with the Urban Centers criteria. In order to promote urban growth within centers,
3 the Urban Center plan shall establish strategies which:

- 4 a. Support pedestrian mobility, bicycle use and transit use;
- 5 b. Achieve a target housing density and mix of use;
- 6 c. Provide a wide range of capital improvement projects, such as street
7 improvements, Schools, parks and open space, public art and community facilities;
- 8 d. Emphasize superior urban design;
- 9 e. Emphasize historic preservation and adaptive reuse of historic places;
- 10 f. Include other local characteristics necessary to achieve a vital urban center;
- 11 and
- 12 g. Include facilities to meet human service needs.

13 LU-34. The system of urban centers shall form the land use foundation for a regional
14 high capacity transit system. Urban centers should receive very high priority for the location of
15 high-capacity transit stations and/or transit centers. (See also LU-47)

16 3. Incentives for Urban Centers

17 *In order to help create Urban Centers, incentives to jurisdictions to establish Urban*
18 *Centers, and to the community to build in Urban Centers, should be established. The*
19 *provision of high-capacity transit (HCT) is one such incentive. Others include funding, and*
20 *streamlined permitting.*

21 LU-35. Countywide financing strategies shall be developed by the GMPC or its
22 successor, ~~((by July 1, 1993))~~ which:

- 23 a. Identify regional funding sources; and
- 24 b. Set priorities and allocate funds for urban facilities and services including
25 social and human services, and subarea planning efforts, in Urban Centers.

26 LU-36. Each jurisdiction electing to contain an Urban Center under Policy LU-28 shall
27 prepare a Programmatic Environmental Impact Statement (PEIS) for each proposed center.
28 The PEIS shall be prepared in a comprehensive manner and shall address probable significant
29 adverse environmental impacts from and reasonable alternatives to the proposal. These may
30 include, but are not necessarily limited to subjects of area-wide concern such as cumulative
31 impacts, housing, schools, public utilities, and transportation. Subsequent project-specific
32 proposals shall not be required to perform duplicative environmental review of issues which
33 have been adequately reviewed in the PEIS, but shall provide additional environmental review
34 of other issues. These may include, but are not necessarily limited to the direct impacts of the
35 specific proposal, substantial changes in the nature of the proposal or information regarding

1 impacts which indicate probable significant adverse environmental impacts which were not
2 adequately analyzed in the PEIS. Examples of project-specific direct impacts include local
3 traffic impacts, site aesthetics, and other issues not addressed by the PEIS.

4 LU-37. In support of centers, additional local action should include:

- 5 a. Strategies for land assembly within the center, if applicable;
6 b. Infrastructure and service financing strategies and economic development
7 strategies for the centers;
8 c. Establishing expected permit processing flow commitments consistent with the
9 PEIS; and
10 d. Establishing a streamlined and simplified administrative appeal process with
11 fixed and certain timelines.

12 LU-38. Jurisdictions should consider additional incentives for development within
13 Urban Centers such as:

- 14 a. Setting goals for maximum permit review time and give priority to permits in
15 Urban Centers;
16 b. Policies to reduce or eliminate impact fees;
17 c. Simplifying and streamlining of the administrative appeal processes;
18 d. Eliminating project-specific requirements for parking and open space by
19 providing those facilities for the Urban Center as a whole; and
20 e. Establishing a bonus zoning program for the provision of urban amenities.

21 4. Manufacturing/Industrial Center Designation Process

22 LU-39. The location and number of regional Manufacturing/Industrial Centers in King
23 County ~~((will be))~~ were determined through the joint local and countywide adoption process,
24 based on the following steps:

- 25 a. Countywide Planning Policies include specific criteria for
26 Manufacturing/Industrial Centers;
27 b. ~~((By October 1, 1992, local jurisdictions shall determine if they will contain a
28 Manufacturing/Industrial Center(s)))~~ Jurisdictions electing ~~((that elect))~~ to contain a
29 Manufacturing/Industrial Center provided the GMPC with a statement specifying ~~((shall
30 specify))~~ how the Center will meet the intent of the Countywide Policies, including plans to
31 adopt criteria, incentives, and other commitment to implement Manufacturing/Industrial
32 Centers;
33 c. ~~((By December 1, 1992, the Growth Management Planning Council shall
34 review and confirm))~~ The GMPC reviewed the Manufacturing/Industrial Centers ~~((that are))~~

1 elected by local jurisdictions consistent with Policy FW-1, ~~((or make adjustments based on:))~~
2 and the following criteria:

3 1. The Center's location in the region, especially relative to existing and
4 proposed transportation facilities and its potential for promoting a countywide system of
5 Manufacturing/Industrial Centers;

6 2. The total number of centers in the county that are needed in the county
7 over the next twenty-years based on twenty years projected need for manufacturing land to
8 satisfy regional projections of demand for manufacturing land assuming a 10 percent increase
9 in manufacturing jobs over this period;

10 3. The type and level of commitments that each jurisdiction has identified for
11 achieving Manufacturing/Industrial Center goals;

12 4. Review of other jurisdictional plans to ensure that growth focused to
13 Manufacturing/Industrial Centers is assured; and

14 5. The accessibility of the Center to existing or planned transportation
15 facilities.

16 d. The GMPC confirmed the following Manufacturing/Industrial Centers: North
17 Tukwila, Duwamish and Ballard/Interbay in Seattle, and the Kent Industrial Area.

18 **5. Manufacturing/Industrial Center Criteria**

19 LU-40. Each jurisdiction which contains a regional Manufacturing/Industrial Center
20 shall adopt in its comprehensive plan a definition of the Center which specifies the exact
21 geographic boundaries of the Center. ~~((Each Center shall be zoned to:))~~ Jurisdictions with
22 Manufacturing/Industrial Centers shall have zoning and detailed plans in place to achieve the
23 following goals by the year 2010.

24 a. Preserve and encourage the aggregation of vacant or non-
25 manufacturing/industrial land parcels sized for manufacturing/industrial uses;

26 b. Discourage land uses ~~((other than))~~ which are not compatible with
27 manufacturing, ~~((and))~~ industrial and advanced technology uses; ~~((and))~~

28 c. Accommodate a minimum of 10,000 jobs; and

29 d. Limit the size of offices and retail unless as an accessory use.

30 LU-41. All jurisdictions support the development of a regional industrial siting policy
31 ~~((to link the countywide manufacturing/industrial centers into the regional network of))~~ to
32 promote industrial activity.

33 LU-42. Jurisdictions shall design access to the regional Manufacturing/Industrial
34 Centers to facilitate the mobility of employees by transit, and the mobility of goods by truck,

1 rail or waterway as appropriate. Regional comprehensive plans shall include strategies to
2 provide capital improvement projects which support access for movement of goods.

3 LU-43. Jurisdictions which contain regional Manufacturing/Industrial Centers in
4 conjunction with ~~((METRO))~~ transit agencies, shall identify transit station areas and
5 right-of-way in each jurisdiction's comprehensive plan. ~~((Transit feeder systems, bicycle routes~~
6 ~~and pedestrian systems shall be established to link the Center to the transit station area(s).))~~
7 Where transit stations exist or are planned, jurisdictions in conjunction with transit agencies
8 shall identify various options such as feeder systems, bicycle routes and pedestrian systems to
9 link the Center with its transit stations.

10 LU-44. In order to reserve right-of-way and potential station areas for high-capacity
11 transit or transit hubs in the regional Manufacturing/Industrial Centers, jurisdictions shall:

12 a. Upon adoption of specific high-capacity transit alignments by METRO, adopt
13 policies to avoid development which would restrict establishment of the high-capacity transit
14 system;

15 b. Preserve right-of-ways controlled by the jurisdiction which are identified for
16 potential transit use; and

17 c. Provide METRO an option to acquire property owned by the jurisdiction.

18 LU-45. ~~((To encourage transit use, jurisdictions shall establish mechanisms to charge~~
19 ~~for single occupancy vehicle parking or a limit on the number of parking spaces for~~
20 ~~single occupancy vehicles within each regional Manufacturing/Industrial Center. All plans for~~
21 ~~regional Manufacturing/Industrial Centers shall encourage bicycle travel and pedestrian cir-~~
22 ~~culation.))~~ Transit agencies shall strive to provide convenient and economic mass transit
23 service for the Manufacturing/Industrial Centers that will result in a decrease in single-
24 occupancy non-commercial vehicle trips within the Centers.

25 LU-46. Jurisdictions' comprehensive plans for regional Manufacturing/Industrial
26 Centers shall demonstrate compliance with the criteria. In order to promote manufactur-
27 ing/industrial growth, the Manufacturing/Industrial Center plan for each jurisdiction shall
28 establish strategies:

29 a. To provide capital facility improvement projects which support the movement
30 of goods and manufacturing/industrial operations;

31 b. To coordinate planning with serving utilities to ensure that utility facilities are
32 available to serve such centers;

33 ~~((b-))~~c. To provide buffers around the Center to reduce conflicts with adjacent
34 land uses;

35 ~~((c-))~~d. To facilitate land assembly; and

1 ((d-))e. To attract the type of businesses that will ensure economic growth and
2 stability.

3 LU-47. Each Manufacturing Center containing a minimum of 15,000 jobs and having
4 sufficient employment densities to support HCT should be served by HCT. It is recognized
5 that by their nature, Manufacturing/Industrial Centers may not achieve densities necessary to
6 make HCT service viable. Nevertheless, Manufacturing/Industrial Centers which are located
7 on the regional high capacity transit alignment and which meet the transit-friendly criteria in
8 policies LU-((42))43 through LU-46 above ((shall)) should receive one or more high capacity
9 transit stations and/or transit centers.

10 6. Incentives for Manufacturing/Industrial Centers

11 LU-48. Countywide financing strategies shall be developed by the GMPC or its
12 successor ((by July 1, 1993)) which:

- 13 a. Identify regional funding sources; and
- 14 b. Set priorities and allocate funds for urban facilities and services including
15 social and human services in regional Manufacturing/Industrial Centers, and subarea planning
16 efforts in Manufacturing/Industrial Centers.

17 LU-49. Jurisdictions shall consider conducting detailed SEPA review for the regional
18 Manufacturing/Industrial Center at the planning stage so that project-specific environmental
19 review is minimized.

20 LU-50. To reduce or prevent conflicts, jurisdictions shall develop policies to establish
21 and support normal manufacturing/industrial practices such as notices on development permits
22 for properties adjacent to a manufacturing/industrial center.

23 F.E. ((4-)) Activity Areas

24 ~~Activity Areas are locations that contain a moderate concentration of commercial~~
25 ~~land uses and some adjacent higher density residential areas. Activity Areas are~~
26 ~~distinguishable from community or neighborhood commercial areas by their larger size and~~
27 ~~their function as a significant focal point for the local community. Activity Areas contain a~~
28 ~~broad spectrum of locations with varied functions, geographic sizes, and land uses.~~

29 Activity Areas are envisioned as areas containing moderate concentrations of
30 commercial development and housing that function as a focal point or the local community.
31 Activity Areas contain a mix of land uses such as retail, recreation areas, public facilities,
32 parks and open space. Although smaller in scale than Urban and Manufacturing/Industrial
33 Centers, Activity Areas contain a sufficient density and mix of uses to provide similar
34 benefits. Activity Areas are designed to 1) provide housing and employment opportunities, 2)
35 provide retail, services and business opportunities, 3) reduce automobile use and support

1 efficient transit service, and 4) consume less land with urban development. Encouraging
2 compact development within Activity Areas is an important part of the Countywide Planning
3 Policy vision promoting infill development and preventing sprawl.

4 Activity Areas are designated in local comprehensive plans. The size of the Activity
5 Area and the mix and density of land uses are locally determined to meet community goals.
6 Examples of Activity Areas ((might)) include the central business districts of Kirkland,
7 Burien, and Des Moines; East Hill in Kent; and a number of business districts in Seattle, such
8 as Lake City, Wallingford, and West Seattle Junction.

9 FW-14 Within the Urban Growth Area, jurisdictions may locally designate one or
10 more Activity Areas characterized by the following:

- 11 a. An array of land uses, including commercial development, housing, public
12 facilities and public open spaces;
13 b. Intensity/density of land uses sufficient to encourage frequent transit;
14 c. Pedestrian emphasis within the Activity Area;
15 d. Emphasis on superior urban design which reflects the local community; and
16 e. Disincentives for single occupancy vehicle usage for commute purposes
17 during peak hours.

18 LU-((55))51. Jurisdictions shall designate the boundaries, ((maximum densities,)) and
19 uses within all activity areas to provide for local employment, a mix of housing types,
20 commercial activities, ((and)) public facilities and open space.

21 LU-((56))52. All Activity Areas that achieve sufficient employment and household
22 densities should receive frequent peak hour transit service. Activity Areas may contain a
23 high-capacity transit station or transit hub if the activity area:

- 24 a. Is on an HCT corridor, or can serve as a transit hub;
25 b. Has pedestrian, bicycle, and transit-supportive site planning, building design
26 and road design regulations; and
27 c. Has parking regulations to encourage transit use.

28 LU-((57))53. To encourage transit use, jurisdictions ((shall)) should establish minimum
29 and maximum parking requirements that reduce dependence on the single-occupant vehicle.
30 Jurisdictions should establish mechanisms to charge for single-occupancy vehicle parking
31 and/or a limit on the number of off-street parking spaces for each activity center. All plans for
32 Activity Areas shall encourage bicycle travel and pedestrian activity.

33 **F. ((E-)) Urban Growth Outside of Centers**

34 A variety of land uses and concentrations of growth occur within the Urban Growth
35 Area and outside of the Urban Centers and Manufacturing/Industrial Centers. Local land

1 use plans will be responsible for the designation, character, and utilization of urban areas
2 outside of centers. However, Countywide Policies are presented below to provide guidance
3 for these areas to ensure that they support the Centers growth concept. These policies do not
4 apply to the rural cities whose land use pattern is described by policies LU 26 and LU 27.

5 Households and employment targets by jurisdiction are described in this section in
6 order to establish the ability, countywide, to accommodate the projected 20 year population
7 and employment growth. The countywide population growth has been established by the State
8 of Washington Office of Financial Management as required by the Growth Management Act.
9 The countywide employment growth has been derived from projections prepared by the Puget
10 Sound Regional Council. For purposes of this section, targets are defined as: The
11 commitment by each jurisdiction to ensure the ability to accommodate, at a minimum, growth
12 within the next 20 years in housing (expressed in households) and employment (expressed in
13 employees). This commitment implies not only the policy and regulatory framework
14 (comprehensive plan and zoning), but the commitment for funded infrastructure as well.

15 1. Urban Residential Areas

16 *Urban residential areas form the bulk of the Urban Growth Area, and are home to a*
17 *large portion of the county's population. They will contain a mix of uses and will have*
18 *different characteristics in different neighborhoods. Generally, the character, form,*
19 *preservation and development of these areas is a local jurisdictional responsibility. However,*
20 *the residential areas need to support the Centers concept and provide sufficient opportunity*
21 *for growth within the UGA. A substantial majority of new residential units will be*
22 *constructed within urban residential areas.*

23 LU-51. In order to ensure efficient use of the land within the Urban Growth Area,
24 provide for housing opportunities, and to support efficient use of infrastructure, each
25 jurisdiction shall:

26 a. Establish in its comprehensive plan a target minimum number of net new
27 ~~((dwelling units))~~ households the jurisdiction will accommodate in the next 20 years, ~~((and))~~
28 Jurisdictions shall adopt regulations to and commit to fund infrastructure sufficient achieve the
29 target number;

30 b. Establish a minimum density (not including critical areas) for new construction
31 in each residential zone; and

32 c. Establish in the comprehensive plan a target mix of housing types for new
33 development and adopt regulations to achieve the target mix.

34 LU-52. The targets and regulations in LU-51 ~~((shall be))~~ are based on the following
35 steps:

1 a. ~~((By October 1, 1992+))~~The GMPC ~~((shall))~~ adopted ~~((a))~~ the target number
2 of net new ~~((dwelling units))~~ households to be accommodated countywide over the next 20
3 years as 195,000;

4 b. ~~((By October 1, 1992+))~~The interjurisdictional staff committee ~~((shall report))~~
5 reported to the GMPC targets ~~((recommended ranges))~~ for net new ~~((dwelling units))~~
6 households for each ~~((unincorporated urban and rural community, and each city))~~ jurisdiction
7 based on the following criteria:

- 8 1. The capacity and condition of existing and forecast ~~((infrastructure,))~~
9 capital facilities and utilities.
- 10 2. Proximity to major employment centers,
- 11 3. Access to existing and projected regional transit,
- 12 4. Capacity of undeveloped land and potential for redevelopment given the
13 character of existing development,
- 14 5. The need for a range of housing types,
- 15 6. Each jurisdiction's share of affordable housing as required by Affordable
16 Housing policies,
- 17 7. Consistency with the countywide numbers;

18 c. The targets as shown in appendix 2 were recommended by the GMPC.
19 adopted and ratified pursuant to policy FW-1, Step 4c.

20 ~~((e-))~~d. The targets in each jurisdiction's comprehensive plan shall be consistent
21 with the targets in Appendix 2 ~~((fall within the ranges,))~~ or shall state the reasons for deviating
22 from the targets ~~((range));~~

23 ~~((d-))~~e. Through the process established under FW-1 Step 4b, if the jurisdiction's
24 comprehensive plan differs from the target, the GMPC may recommend amendments to either
25 the Countywide Planning Policies or local plans; and

26 ~~((e-))~~f. ~~The interjurisdictional staff committee shall recommend a process to~~
27 ~~monitor the implementation of this policy. The process should include members of the public.~~
28 Monitoring should follow the process described in policy FW-1.

29 2. Urban Employment Growth

30 *A portion of the urban employment growth will occur in activity areas and*
31 *neighborhoods in the urban area. This employment growth will support the Urban Centers,*
32 *while balancing local employment opportunities in the urban area.*

33 LU-53. Targets for employment growth outside Urban Centers ~~((shall be))~~ were
34 established for cities and for unincorporated urban communities through the joint local and
35 countywide adoption process based on the following steps:

1 a. ~~((By December 1992-t))~~The Growth Management Planning Council ~~((shall))~~
2 adopted 20 year target numbers for employment growth ~~((and employment capacity inside~~
3 ~~urban centers and outside urban centers))~~ as 347,400. ~~((By October 1992-t))~~The
4 interjurisdictional staff committee ~~((shall))~~ developed preliminary recommendations for targets
5 ~~((ranges))~~ of employment growth and capacity inside and outside urban areas in each ~~((city, in~~
6 ~~unincorporated urban communities and in rural areas))~~ jurisdiction based on the following
7 criteria:

- 8 1. Consistency with the countywide numbers;
- 9 2. The need to direct growth to urban centers based on consistency with the
10 multiple centers strategy;
- 11 3. Access to regional rapid transit and existing highway and arterial
12 capacity;
- 13 4. Availabilities of undeveloped land and potential for redevelopment given
14 the character of existing development;
- 15 5. The willingness of local jurisdictions to implement policies which
16 encourage transit such as S.O.V. parking charges and/or limits, transit, bicycle and pedestrian
17 supportive design, and the adoption of policies that encourage clustering of commercial and
18 residential areas;

19 b. The targets as shown in Appendix 2 were recommended by the GMPC.
20 adopted and ratified pursuant to Policy FW-1, Step 4c.

21 ~~((b-))~~c. As part of their comprehensive plans, all jurisdictions shall indicate
22 planned employment capacity and targeted increases in employment for 20 years inside and
23 outside urban centers and shall show how their plans reflect the criteria in this policy; and

24 ~~((e-))~~d. Through the process established under FW-1 Step 4b, if the jurisdiction's
25 comprehensive plan differs from the target, the GMPC may recommend amendments to either
26 the Countywide Planning Policies or local plans.

27 3. Infill Development

28 *Urban growth occurs both in "new" neighborhoods and in existing neighborhoods.*
29 *Existing neighborhoods have a history of development patterns which have created a sense of*
30 *identity. At the same time a vital neighborhood adapts to change and develops its own image.*
31 *New development in these neighborhoods should build on the existing patterns in a manner*
32 *which respects and enriches the neighborhood. For example in single family neighborhoods*
33 *selective permitting of accessory units and carriage houses may be more compatible than new*
34 *apartment buildings.*

1 LU-54. All jurisdictions shall develop neighborhood planning and design processes to
2 encourage infill development and enhance the existing community character and mix of uses.

3 **4.((57)) Business/Office Parks**

4 *Business/Office Parks are areas where low-density office development is collected at*
5 *locations separated from an identified retail commercial core. These parks tend to have low*
6 *densities and thus tend not to be supportive of transit or pedestrian circulation. These*
7 *employment opportunities generally do not require extensive land for their operations, and*
8 *could be accommodated in Urban Centers. Because the further development of these areas*
9 *may compete with the employment growth that is planned to support Urban Centers,*
10 *significant future employment will not be encouraged in these areas.*

11 LU-58. Office building development is directed primarily to Urban Centers. Office
12 building development outside Urban Centers including business/office parks should occur
13 within activity areas, which can be supported by and promote transit, pedestrian and bicycle
14 uses.

15 LU-59. ~~Jurisdictions shall not expand existing land area zoned for business/office~~
16 ~~parks.~~ Jurisdictions where consistent with their land use plans should provide incentives for
17 the development and redevelopment of an adequate supply of land suitable for mixed light
18 industrial/commercial and high technology.

19 LU-60. All jurisdictions shall establish mechanisms to encourage transit use. Examples
20 of potential mechanisms include a charge for S.O.V. parking and/or a limit on the number of
21 parking spaces for single occupancy vehicles within each existing business/office park. Bicycle
22 and pedestrian supportive design should be encouraged.

23 LU-61 ~~((To implement policy LU-53, all))~~ Jurisdictions ~~((shall establish maximum~~
24 ~~Floor Area Ratios and/or maximum employment levels for office use in existing business/office~~
25 ~~parks. These maximums are intended to channel future employment and office space growth~~
26 ~~from business/office parks outside of Urban Centers to Urban Centers))~~ are encouraged to site
27 business/office parks where they can be served by adequate surface transportation and transit.
28 Where transit is available and can result in decreased demand for parking, higher density
29 development should be considered.

30 LU-62. All jurisdictions should develop planning mechanisms to assist in the
31 conversion of business/office parks to mixed use areas. Jurisdictions should ~~((encourage))~~
32 provide for inclusion of residential and neighborhood commercial land uses and open space
33 within existing business/office parks.

34 **III. TRANSPORTATION**

35 **A. Transportation Overview**

1 *RCW 36.70A.070(6) (Growth Management Act) fundamentally changes the way that*
2 *comprehensive planning will be done within the State of Washington. The Act places special*
3 *emphasis on transportation making it unlawful to approve development for which the*
4 *approving jurisdiction cannot demonstrate the availability of facilities, strategies and services*
5 *which are needed to accommodate the growth in traffic at the adopted level-of-service within*
6 *six years. Future development activity will be constrained by a jurisdiction's ability to*
7 *finance and provide transportation improvements or strategies. This fact has some very*
8 *significant implications for all jurisdictions which are dependent upon the region's*
9 *transportation systems because:*

10 1. *Projected traffic growth on the freeway and arterial system within the region*
11 *greatly exceeds the foreseeable collective ability to finance and construct the improvements*
12 *needed to retain historical levels-of-service.*

13 2. *Maintaining the current level of personal mobility by single occupant*
14 *vehicles will be a costly public investment that will negatively impact the regional quality of*
15 *life, create severe impacts to sensitive areas, degrade environmental quality, and increase*
16 *energy use and the consumption of land.*

17 3. *Development within any one jurisdiction can be severely impacted by*
18 *decisions and actions beyond that jurisdiction's control:*

19 • *WSDOT may be unable to program improvements concurrent with a*
20 *jurisdiction's approval of a development permit.*

21 • *Metro may not be able to respond to transit levels-of-service adopted by*
22 *local jurisdictions.*

23 • *A jurisdiction may adopt level-of-service standards for arterials within its*
24 *jurisdiction and decline to accept improvements necessary to mitigate transportation impacts*
25 *from a proposed development in an adjoining jurisdiction.*

26 • *Cumulative growth throughout the region will cause traffic growth on the*
27 *existing network and may thereby exhaust the capacity for local jurisdictions to approve*
28 *development.*

29 *In light of these financial constraints and potential dangers, it will be necessary to*
30 *undertake a dramatically different approach for both transportation planning and land use*
31 *planning, than has been done in the past. This is necessary if the region is to avoid*
32 *haphazard denials of development permits following the July 1994 deadline for implementing*
33 *ordinances. In order to limit sprawl, create the desired urban form, and provide some*
34 *measure of predictability for landowners and developers, the region's scarce resources for*
35 *transportation capacity improvements must be used prudently to focus on areas where zoning*

1 *and densities support a multi-modal transportation system. System capacity investments*
2 *should be targeted first to those areas where the existing land use and transportation system*
3 *provides some hope of achieving the desired multi-modal level-of-service within six years.*

4 **B. Transportation Policies**

5 FW-14. The land use pattern shall be supported by a balanced transportation system
6 which provides for a variety of mobility options. This system shall be cooperatively planned,
7 financed, and constructed. Mobility options shall include a High Capacity Transit system
8 which links the urban centers and is supported by an extensive High Occupancy Vehicle
9 system, local community transit system for circulation within the centers and to the non-center
10 urban areas, and non-motorized travel options.

11 FW-15. All jurisdictions in the county, in cooperation with Metro, the Metropolitan
12 Planning Organization, and the State, shall develop a balanced transportation system and
13 coordinated financing strategies and land use plan which implement regional mobility and
14 reinforce the countywide vision. Vision 2020 Regional Growth Strategies shall be recognized
15 as the framework for creating a regional system of Centers linked by High Capacity Transit and
16 an interconnected system of freeway High Occupancy Vehicle (HOV) lanes, and supported by
17 a transit system.

18 FW-16. In recognition of the fact that King County is the regional freight distribution
19 hub and a major international trade gateway, and that freight transportation is one of the state's
20 most important basic sector economic activities, goods mobility by all modes shall be included
21 as a component of comprehensive plans.

22 T-1. The countywide transportation system shall promote the mobility of people
23 and goods and shall be a multi-modal system based on regional priorities consistent with
24 adopted land use plans. The transportation system shall include the following:

- 25 a. An aggressive transit system, including High Capacity Transit;
- 26 b. High Occupancy Vehicle facilities;
- 27 c. Freight railroad networks;
- 28 d. Marine transportation facilities and navigable waterways;
- 29 e. Airports;
- 30 f. Transportation Demand Management actions;
- 31 g. Non-motorized facilities; and
- 32 h. Freeways, highways, and arterials.

33 T-2. King County, its cities, adjacent counties, Metro, and the Washington State
34 Department of Transportation (WSDOT) shall support the continuous, comprehensive and
35 cooperative transportation planning process conducted by the Puget Sound Regional Council

(PSRC) pursuant to its Metropolitan Planning Organization (MPO) designation. The primary forum for the development of regional transportation systems plans and strategies shall be the PSRC, as the MPO.

T-3. The annual update and approval of the six-year Transportation Improvement Program (TIP) by the PSRC should be the primary tool for prioritizing regional transportation improvements and programming regional transportation revenues.

T-4. The GMPC or its successor shall have the ongoing responsibility for the following:

a. Developing and maintaining coordinated level-of-service standards and a concurrency system for countywide transit routes and arterial streets, including state facilities;

b. Developing regionally consistent policies for implementing countywide Transportation Demand Management actions and the Commute Trip Reduction Act including, but not limited to, parking policies, with an examination of price as a determinant of demand; and

c. Developing and recommending transportation financing strategies, including recommendations for prioritizing capacity improvements eligible to receive federal funds available to the region under the Inter-modal Surface Transportation Efficiency Act (ISTEA).

1. High Capacity Transit/Regional Transit Project (HCT/RTP)

T-5. Each Urban Center will be providing for a minimum of 15,000 jobs and should be served by High Capacity Transit (HCT). Each Manufacturing Center containing a minimum of 15,000 jobs and having sufficient employment densities to support HCT should be served by HCT. All jurisdictions that would be served by HCT shall plan for needed HCT rights-of-way, stations and station supportive transportation facilities and land uses in their comprehensive plans. The land use and transportation elements of comprehensive plans shall incorporate a component to reflect future improvement needs for High Capacity Transit. Interim regional transit service should be provided to centers until the center is served by HCT. If voters do not approve HCT local option taxes, jurisdictions shall address this implication in the reassessment phase.

T-6. WSDOT should assign a high priority to completion of the core HOV lanes in the central Puget Sound region. King County, its cities, and Metro Council representatives on the Transportation Policy and Executive Boards of the Puget Sound Regional Council (PSRC) shall make completion of this system a high priority in programming the federal funds available to the region.

2. Non-motorized Transportation

1 T-7. The transportation element of Comprehensive Plans shall include pedestrian
2 and bicycle travel as part of the transportation system and be developed on a coordinated,
3 regional basis. The bicycle and pedestrian element shall be a part of the funding component of
4 the capital improvement program.

5 3. Freeways/Highways/Arterials

6 T-8. In order to maintain regional mobility, a balanced multi-modal transportation
7 system shall be planned that includes freeway, highway and arterial improvements by making
8 existing roads more efficient. These improvements should help alleviate existing traffic
9 congestion problems, enhance HOV and transit operations, and provide access to new desired
10 growth areas, as identified in adopted land use plans. General capacity improvements
11 promoting only Single Occupant Vehicle traffic shall be a lower priority. Transportation plans
12 should consider the following mobility options/needs:

- 13 a. Arterial HOV treatments,
- 14 b. Driveway access management for principal arterials within the Urban Growth
15 Area; and
- 16 c. Improvements needed for access to manufacturing and industrial centers,
17 marine and air terminals.

18 FW-17. Infrastructure planning and financing shall be coordinated among jurisdictions
19 to direct and prioritize countywide facility improvements to implement the countywide vision
20 and land use plans.

21 FW-18. Where appropriate, King County and its cities shall adopt a clear definition of
22 level-of-service and concurrency requirements and establish a consistent process for
23 implementing concurrency, including accountability for impacts for adjacent jurisdictions.

24 FW-19. Each jurisdiction shall identify the facilities needed to ensure that services are
25 provided consistent with the community's adopted service levels. Timelines for the
26 construction of the needed facilities shall be identified.

27 4. Transportation Level-of-Service (LOS)

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

31 T-10. Each local jurisdiction shall establish mode-split goals for non-SOV travel to all
32 significant employment centers to reflect that center's contribution to the solution of the
33 region's transportation problem. Mode-split goals will vary according to development
34 densities, access to transit service and other alternative travel modes and levels of congestion.
35 Comprehensive plans shall demonstrate what transportation system improvements, demand

1 management and land use strategies will be implemented to achieve these mode-split goals.

2 These local goals shall be coordinated to achieve county and regional goals.

3 T-11. Elements to be considered in the level-of-service standard are mobility options
4 that encourage the use of transit, other high occupancy vehicles, demand management actions,
5 access to transit, and non-motorized modes of travel. These standards shall be consistent with
6 the requirements of the Commute Trip Reduction Act.

7 T-12. Mode split goals and measures of mobility for transit, ridesharing and
8 non-motorized travel shall be established by local jurisdictions and METRO.

9 T-13. Level-of-service standards shall vary by differing levels of development patterns
10 and growth management objectives. Lower arterial standards, tolerating more congestion,
11 shall be established for urban centers. Transit LOS standards may focus on higher service
12 levels in and between centers and decrease as population and employment densities decrease.

13 T-14. Metro should develop transit level-of-service standards which provide the
14 county and cities with realistic service expectations to support adopted land uses and desired
15 growth management objectives. These standards should consider that route spacing and
16 frequency standards are necessary for differing service conditions including:

- 17 a. Service between designated centers served by High Capacity Transit;
- 18 b. Service between designated centers not served by High Capacity Transit; and
- 19 c. Service to areas outside centers.

20 **5. Reassessment**

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

- 25 a. Adjust land use and level-of-service standards to better achieve mobility and
26 the regional vision;
- 27 b. Make full use of all feasible local option transportation revenues authorized
28 but not yet implemented; and
- 29 c. Work with WSDOT, Metro, and the private sector to seek additional state
30 transportation revenues and local options to make system improvements necessary to accom-
31 modate projected employment and population growth.

32 **6. Financing**

33 T-16. Transportation elements of Comprehensive Plans shall reflect the preservation
34 and maintenance of transportation facilities as a high priority to avoid costly replacements and
35 to meet public safety objectives in a cost-effective manner.

1 T-17. Developer impact fees shall be structured to ensure that new development con-
2 tributes its fair share of the resources needed to mitigate the impact on the transportation
3 system. Adjoining jurisdictions shall execute interlocal agreements for impact fees which
4 recognize that traffic generated in one jurisdiction contributes to the need to make
5 transportation improvements across jurisdictional boundaries. Impact fees shall not be
6 assessed to cure that portion of the improvement attributable to correcting existing
7 deficiencies.

8 T-18. Existing local option transportation funding shall be applied within King County
9 as follows:

- 10 a. Employee tax base -- reserved for city street utility development;
11 b. Commercial parking tax -- defer action, pending development of a regional
12 TDM strategy;
13 c. HOV acceleration financing -- defer until after High Capacity Transit vote;
14 and
15 d. Local option gas tax -- consider as potential source to address transportation
16 "concurrency" needs of county and cities only after vote on High Capacity Transit.

17 T-19. Regional revenues (such as Inter-modal Surface Transportation Efficiency Act
18 funds) which provide discretion should be used to address regional mobility projects and
19 strategies, including such strategies as creating centers or enhancing transit/HOV-SOV mode
20 split.

21 **7. State Transportation Role**

22 T-20. Consistent with the countywide vision, local governments shall coordinate with
23 the State on land use and transportation systems and strategies which affect state facilities and
24 programs.

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

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

32 **8. Siting Regional and Countywide Transportation Facilities**

33 T-23. King County, the cities, the Puget Sound Regional Council, the State, Metro,
34 and other transportation providers shall identify significant regional and/or countywide land

IV. COMMUNITY CHARACTER AND OPEN SPACE

A measure of the success of planning for growth is the extent to which we restore, maintain and create good places to live, work and play. We must encourage growth which improves our neighborhoods and landscapes, and builds a strong sense of place. The following policies on cultural resources, civic architecture and landmarks, multi-use roadways, infill development, and incentives for urban and rural design, aim to promote good community character.

FW-20. All jurisdictions shall support the county's existing diversity of places to live, work and recreate and the ethnic diversity of our communities. The countywide development pattern shall include sufficient supply of quality places for housing, employment, education, recreation, and open space and the provision of community and social services.

FW-21. Each urban area shall be characterized by superior urban design as locally defined.

FW-22. Significant historic, archaeological, cultural, architectural and environmental features shall be respected and preserved.

A. Historic Resources

Historic resources create a sense of local identity and history, enhance the quality of life, support community vitality, and otherwise enrich our lives. Historic resources are non-renewable; they embody the unique heritage and evolution of particular places. Thoughtful management of these resources contributes to economic development and moderates some of the harmful effects of rapid growth. Planning for historic resources includes protecting archaeological sites and historic buildings and landscapes, encouraging expression of diverse ethnic and folk traditions, and supporting activities for children and youth.

CC-1. All jurisdictions should work individually and cooperatively to identify, evaluate, and protect historic resources including continued and consistent protection for historic resources and public art works.

CC-2. All jurisdictions shall encourage land use patterns and implement regulations that protect and enhance historic resources, and sustain historic community character.

B. Urban Design

Governments should be leaders in providing structures, public spaces, parks and streets which support the quality of our region. Civic design should express the region's values and vision, and should provide landmarks which contribute to our sense of place. Additionally, individual jurisdictions can nurture their individual character by developing a

1 *Additionally, individual jurisdictions can nurture their individual character by developing a*
2 *clear set of goals and policies which outline the public interest in the design of private*
3 *development in the urban and rural communities.*

4 CC-3. All jurisdictions shall promote a high quality of design and site planning in
5 publicly-funded construction (such as civic buildings, parks, bridges, transit stops), and in pri-
6 vate development.

7 **C. Human and Community Services**

8 *Human and community services are: social and health services; emergency shelters;*
9 *meeting places; performing arts and cultural activities; schools; libraries; parks and*
10 *recreation; and fire and police protection.*

11 CC-4. Human and community service planning activities shall support Countywide
12 Planning Policies and the countywide land development pattern.

13 CC-5. All jurisdictions shall identify essential community and human services and
14 include them in land use, capital improvement, and transportation plans.

15 **D. Open Space**

16 *Open space lands are essential to the community character of King County. They*
17 *provide visual variety and relief from developed areas, protect environmental quality, and*
18 *provide wildlife habitat and foster opportunities for outdoor recreation. Open space*
19 *corridors physically and functionally link open space lands.*

20 *The challenge for jurisdictions is to establish programs that contribute to the*
21 *protection, accessibility and stewardship of open space lands and corridors. The GMA*
22 *requires jurisdictions to form linkages between and within population centers with lands*
23 *useful for recreation, trails, wildlife habitat and connection of critical areas. These open*
24 *space lands and corridors or greenways should be selected and preserved to form an*
25 *interconnected system regionally and within jurisdictions locally and should be stewarded to*
26 *ensure continuing environmental and ecological significance. Where appropriate, the*
27 *regional system and its local components should provide for multiple benefits and functions,*
28 *which will require careful planning and management to ensure compatibility and long-term*
29 *viability of the benefits and functions.*

30 *Open space lands and corridors have significance at both the local and regional*
31 *scale. Identification and protection of local open spaces will be considered within the*
32 *comprehensive plans of each jurisdiction. On an individual basis, jurisdictions should strive*
33 *to identify, establish and protect open space lands of local significance that also compliment,*
34 *adjoin or enhance the regional system. The regional open space system includes open space*

lands and corridors that have importance beyond jurisdictional boundaries and will require multi-jurisdictional coordination to identify, protect and steward.

FW-23. All jurisdictions shall cooperatively identify, establish, protect and steward urban and rural open space corridors of regional significance.

CC-6. A regional open space system shall be established to include lands which:

- a. Provide physical and/or visual buffers such as open spaces which help to separate incompatible uses, distinguish the urban and rural areas, define urban growth boundaries, or establish the character of a neighborhood, community, city or region;
- b. Provide active and passive outdoor recreational opportunities which are compatible with the environmental and ecological values of the site; and/or
- c. Contain natural areas, habitat lands, natural drainage features, and/or other environmental, cultural, and scenic resources.

CC-7. All jurisdictions shall work cooperatively to identify and protect open space corridors of regional significance. This process shall include:

- a. Identification of regional open space lands and corridors which form a functionally and physically connected system with environmental, ecological, recreational and aesthetic significance and which is readily accessible to our urban populations;
- b. Identification of implementation strategies and regulatory and non-regulatory techniques to protect the -lands and corridors, including collaboration and coordination with land trusts and other land preservation organizations; and
- c. Development of management plans and strategies to sustain the corridors' open space benefits and functions of the preserved lands and corridors.

CC-8. Water bodies and rivers of the Puget Sound region form an important element of the open space system. Jurisdictions shall work to protect visual access to water bodies and rivers, and provide for physical access where appropriate.

CC-9. Countywide funding shall be available for the acquisition, maintenance and stewardship of parks and open space, a) advancing the development of the regional open space system which has been cooperatively identified by the jurisdictions, and b) ensuring the ready access of our citizens residing in Urban Centers to the regional open space system.

CC-10. The conceptual map of open space systems contained in the 1988 King County Open Space Plan shall be used as the planning basis for regional open space lands and corridors. All jurisdictions will work cooperatively to revise and supplement this map to direct the protection of these valuable resources throughout the county.

CC-11. All jurisdictions shall work cooperatively to ensure parks and open spaces are provided as development and redevelopment occur.

1 CC-12. All jurisdictions shall use the full range of regulatory and land preservation
2 tools available to create, maintain and steward the regional open space system which has been
3 cooperatively identified.

4 CC-13. All jurisdictions shall develop coordinated level of service standards for the
5 provision of parks and open spaces.

6 V. AFFORDABLE HOUSING

7 *Adequate housing, for all economic segments of the population, is a basic need of*
8 *King County's residents and an issue of countywide concern. Affordable housing needs must*
9 *be addressed by local governments working in cooperation with the private sector and*
10 *nonprofit housing agencies.*

11 *The GMA requires countywide policies to address parameters for the distribution of*
12 *affordable housing, including housing for all income groups. This complex issues requires*
13 *adequate information regarding current housing resources and housing needs, which is being*
14 *developed for comprehensive plan housing elements, as well as in-depth discussion of values*
15 *and priorities for housing development.*

16 *Providing sufficient land for housing development is an essential step in promoting*
17 *affordable housing. Affordable housing can be encouraged by zoning additional land for*
18 *higher residential densities, which helps provide needed capacity for growth, reduces land*
19 *development cost per units, and allows for lower cost construction types such as attached*
20 *dwelling. Higher density housing includes a range of housing types: small-lot single family,*
21 *attached single family, mobile home parks, apartments and condominiums. In addition,*
22 *zoning changes that permit additional housing in established areas, such as accessory units,*
23 *carriage houses, and residences built above commercial uses, increase affordable housing*
24 *opportunities.*

25 FW-24. All jurisdictions shall provide for a diversity of housing types to meet a variety
26 of needs and provide for housing opportunities for all economic segments of the population.
27 ((incomes)). All jurisdictions shall cooperatively establish a process to ensure an equitable and
28 rational distribution of low-income and affordable housing throughout the county in
29 accordance with land use policies, transportation, and employment locations.

30 AH-1 All jurisdictions shall plan for housing to meet the needs of all economic
31 segments of the population. Each jurisdiction shall specify, based on the projected number of
32 net new housing units anticipated in its comprehensive plan, the estimated number of units
33 which will be affordable for the following income segments: 0 to 50 percent of the countywide
34 median household income, 50 to 80 percent of median, 80 to 120 percent of median, and
35 above 120 percent median. The estimates for housing affordable to households below 80

1 percent of median income shall be consistent with countywide objectives for low and moderate
2 income housing in Policy AH-2. The estimated number of units for each income segment shall
3 be reported to the GMPC following adoption of the comprehensive plan, for the purpose of
4 countywide monitoring of capacity for housing development.

5 ~~((AH-5))~~. Within the urban growth area, each jurisdiction shall demonstrate
6 ~~((maximize))~~ its ability to accommodate sufficient, affordable housing for all economic
7 segments of the population. Local actions may include zoning land for development of
8 sufficient densities, revising development standards and permitting procedures as needed to
9 encourage affordable housing. ~~((by removing regulatory barriers,))~~ reviewing codes for
10 redundancies and inconsistencies, and providing opportunities for a ~~((full))~~ range of housing
11 types, such as accessory dwelling units, manufactured homes ~~((on individual lots,))~~ group
12 homes and foster care facilities, apartments, townhouses and attached single family housing.

13 AH-2~~((4))~~. All jurisdictions shall share the responsibility for achieving a rational and
14 equitable distribution of affordable housing to meet the housing needs of low and moderate
15 income residents in King County. The distribution of housing affordable to low and moderate
16 income households shall ~~((reflect))~~ take into consideration the need for proximity to lower
17 wage employment, ~~((and))~~ access to transportation and human services, ~~((;))~~ and the adequacy
18 of infrastructure to support housing development; recognize each jurisdiction's past and current
19 efforts to provide housing affordable to low and moderate-income households; avoid
20 over-concentration of assisted housing; and increase housing opportunities and choices for low
21 and moderate income households in communities throughout King County. Each jurisdiction
22 shall give equal consideration to local and countywide housing needs.

23 a. Existing Needs for Affordable Housing

24 Each jurisdiction shall participate in developing countywide housing resources and
25 programs to assist the large number of low and moderate income households who currently do
26 not have affordable, appropriate housing. These countywide efforts will help reverse current
27 trends which concentrate low income housing opportunities in certain communities, and
28 achieve a more equitable participation by local jurisdictions in low income housing
29 development and services. Countywide efforts should give priority to assisting households
30 below 50 percent of median income that are in greatest need and communities with high
31 proportions of low and moderate income residents.

32 By October, 1994, the GMPC shall appoint elected and community representatives to
33 develop recommendations for providing low and moderate income housing and related
34 services. Within one year the committee shall recommend to the GMPC:

1 1. new countywide funding source(s) for housing production and services, and a
2 plan to establish this funding within three years;

3 2. participation by local governments, including appropriate public and private
4 financing, such that each jurisdiction contributes on fair share basis; and

5 3. objectives for housing and related services, including measurable levels of
6 housing production and costs to provide necessary related service.

7 Countywide programs should provide the following types of housing and related
8 services:

9 1. low income housing development, including new construction, acquisition,
10 and rehabilitation;

11 2. housing assistance, such as rental vouchers and supportive services;

12 3. assistance to expand the capacity of nonprofit organizations to develop
13 housing and provide housing related services;

14 4. programs to assist homeless individuals and families;

15 5. programs to prevent homelessness; and

16 6. assistance to low and moderate income home buyers

17 b. Future Needs for Affordable Housing

18 Each jurisdiction shall specify the range and amount of housing affordable to low and
19 moderate income households to be accommodated in its comprehensive plan. Each jurisdiction
20 shall plan for a number of housing units affordable to households with incomes between 50 and
21 80 percent of the County median household income that is equal to 17 percent of its projected
22 net household growth. In addition, each jurisdiction shall plan for a number of housing units
23 affordable to households with incomes below 50 percent of median income that is either 20
24 percent or 24 percent of its projected net household growth. For this housing, the target
25 percentage shall be determined using the Affordable Housing Job/Housing Index developed
26 using Census-based information, which is contained in Appendix 3.

27 ~~((AH 2.))~~ Each jurisdiction shall show in its comprehensive plan how it will use
28 policies, incentives, regulations and programs to provide its share of housing affordable to low
29 and moderate-income households ~~((as determined by the process outlined in AH 1.))~~ Each
30 jurisdiction should apply strategies which it determines to be most appropriate to the local
31 housing market. For example, units affordable to low and moderate income households may
32 be developed through new construction projects that assure long-term affordability of existing
33 housing, or accessory housing units added to existing structures. Local actions may include:

1 a. Identifying the costs to develop and preserve subsidized housing and other
2 low-cost housing not provided by private development in the local housing market, and
3 identifying sources of funding;

4 b. Revising land use regulations as needed to remove any unreasonable
5 requirements that may create barriers to siting and operating housing for special needs groups.
6 Special needs housing serves persons, who, by virtue of disability or other circumstances,
7 face difficulty living independently and require supportive services on a transitional or long-
8 term basis; and

9 c. Adopting land use incentives programs or other regulatory measures to
10 encourage private and nonprofit development

11 Small, fully built cities and towns that are not planned to grow substantially under
12 GMA may work cooperatively with other jurisdictions and/or subregional housing agencies to
13 meet their housing targets.

14 In areas identified as city expansion areas, King County and cities should plan
15 cooperatively for affordable housing development and preservation.

16 ~~((The GMPC shall define and quantify affordable housing needs for low and~~
17 ~~moderate income households and countywide objectives for distribution of affordable housing~~
18 ~~for low and moderate income households. The process shall include involvement by housing~~
19 ~~industry representatives, housing interest groups, and community organizations. The~~
20 ~~Affordable Housing Technical Forum, which has representatives from the County and each~~
21 ~~city, shall prepare recommendations for the GMPC by August 1, 1992.~~

22 ~~By October 1, 1992 each jurisdiction shall specify the range and amount of housing~~
23 ~~affordable to low and moderate income households to be accommodated in its comprehensive~~
24 ~~plan, based on countywide objectives for distribution. By December 1, 1992 the GMPC will~~
25 ~~review, and the county and cities will ratify, the countywide objectives for distribution and~~
26 ~~each jurisdiction's proposed range and amount of affordable housing units.~~

27 ~~The process shall address:~~

28 ~~a. Development and preservation of subsidized housing and low cost market rate~~
29 ~~housing;~~

30 ~~b. The definition of low income and moderate income housing;~~

31 ~~c. Guidelines to meet affordable housing needs in individual jurisdictions as well~~
32 ~~as need throughout King County, including recognition for jurisdictions that already meet the~~
33 ~~guidelines;~~

34 ~~d. Strategies, including land use incentives, streamlined permitting processes, and~~
35 ~~funding commitments, to be adopted by all jurisdictions to provide affordable housing; and~~

1 e. ~~Guidelines to ensure that affordable housing is provided in conjunction with~~
2 ~~regional transportation planning, including funding for acquisition and rehabilitation to pre-~~
3 ~~serve existing affordable housing; funding and incentives for development of new housing in~~
4 ~~infill and redevelopment projects; and, subject to a legal determination, inclusionary~~
5 ~~requirements to ensure that a proportion of new residential development is affordable to low~~
6 ~~and moderate income households.))~~

7 AH-3. Each jurisdiction shall evaluate its existing resources of subsidized and low-cost
8 non-subsidized housing and identify housing that may be lost due to redevelopment, dete-
9 riorating housing conditions, or public policies or actions. Where feasible, each ~~((Each))~~
10 jurisdiction shall develop strategies to preserve existing low-income housing ~~((where feasible))~~
11 and provide relocation assistance to low income residents who may be displaced.

12 AH-4 The GMPC shall identify ways to expand technical assistance to local
13 jurisdictions in affordable housing techniques. Technical assistance should include project case
14 studies and model ordinances covering such topics as development and financing of nonprofit
15 housing, provision of housing-related services, incentives programs for affordable housing,
16 regulations that encourage well-designed higher density housing, improvements to
17 development permit processing and standards to reduce development costs, and public
18 education and involvement. The Affordable Housing Task Force Report, dated March 1994
19 contains a summary of actions that local governments may use to encourage affordable
20 housing.

21 AH-5 ~~((4))~~. All jurisdictions shall monitor residential development within their
22 jurisdiction and determine annually the total number of new and redeveloped units receiving
23 permits and units constructed, housing types, developed densities and remaining capacity for
24 residential growth. Housing prices and rents also should be reported, based on affordability to
25 four income categories: 0 to 50 percent of median income, 50 to 80 percent of median, 80 to
26 120 percent of median, and above 120 percent of median. King County shall report annually
27 on housing development, the rate of housing cost and price increases and available residential
28 capacity countywide in its annual growth reporting.

29 The Affordable Housing and Data Technical Forums, which are comprised of city and
30 county staff and private housing industry representatives, shall develop a uniform approach for
31 monitoring housing permit activity, construction, and affordability. Where feasible, the
32 Affordable Housing and Data Technical Forums shall consider collecting statistics such as:
33 housing units receiving building permits by income category, total units constructed by income
34 category, low and moderate income housing acquired or preserved, households receiving rental
35 assistance, and other local housing activities. In addition where feasible, planning and

1 monitoring for affordable housing should use the median household income for King County
2 indexed by household size, published annually by the U.S. Department of Housing and Urban
3 Development. Calculations of affordable house prices should assume standard Federal
4 Housing Administration lending criteria and minimum downpayments.

5 AH-6 Every five years, beginning in 1999, the GMPC or its successor organization
6 responsible for monitoring growth management implementation shall evaluate achievement of
7 countywide and local goals for housing for all economic segments of the population. The
8 GMPC shall consider annual reports prepared under Policy AH-5 as well as market conditions
9 and other factors affecting housing development. If the GMPC determines that housing
10 planned for any economic segment falls short of the need for such housing, the GMPC may
11 recommend additional actions.

12 As part of its evaluation, the GMPC shall review local performance in meeting low and
13 moderate income housing needs. The basis for determining local performance shall be a
14 jurisdiction's participation in countywide or subregional efforts to address existing housing
15 needs and actual development of the target percentage of low and moderate income housing
16 units as adopted in its comprehensive plan. In establishing planning targets to address future
17 affordable housing needs, it is recognized that success will be dependent in part upon regional
18 factors beyond the control of any single jurisdiction. Any one jurisdiction acting alone, or even
19 in concert with other local governments, may or may not be able to achieve there targets in
20 these policies, despite its best efforts. Success will require cooperation and support for
21 affordable housing from the state, federal and local governments, as well as the private sector.
22 The significant role of the market must also be recognized. In determining performance the
23 GMPC shall therefore use reasonable judgment, and also shall consider these market and other
24 factors, as well as action taken to encourage development and preservation of low and
25 moderate income housing, such as local funding, development code changes, and creation of
26 new programs.

27 **VI. CONTIGUOUS AND ORDERLY DEVELOPMENT And PROVISION OF** 28 **URBAN SERVICES TO SUCH DEVELOPMENT**

29 *Chapter II, "Land Use Pattern," contains policies for phasing development within the*
30 *Urban Growth Area. An integral component of the phasing process is ensuring that*
31 *development is accompanied by a full range of urban services. Equally important is ensuring*
32 *that infrastructure improvements are not provided in advance of development which could*
33 *undermine the countywide development pattern. This chapter provides policies which support*
34 *phasing within the Urban Growth Area and ensure the integrity of the countywide land*
35 *development pattern.*

1 FW-25. Planning for and financing of services shall be coordinated among jurisdictions
2 to direct and prioritize countywide facility improvements to implement the countywide
3 policies.

4 FW-26. Jurisdictions shall identify the services needed to achieve adopted service
5 levels. Timelines for constructing needed services shall be identified.

6 FW-27. Protection of public health and safety and the environment shall be given high
7 priority in decision-making about infrastructure improvements. County residents in both urban
8 and rural areas shall have reasonable access to a high-quality drinking water source meeting all
9 federal and state drinking water requirements. Management and operation of existing on-site
10 septic systems shall not result in adverse impacts to public health or the environment.

11 A. General Policies

12 *To ensure that land use is accompanied with the maximum possible use of existing*
13 *facilities and cost-effective service provisions and extensions, and to encourage development*
14 *of strong, interrelated communities, policies are needed which integrate a full range of urban*
15 *services with land-use planning and environmental protection. Urban service definitions*
16 *should be guided by "public services," "public facilities," and "urban governmental services"*
17 *as defined in RCW 36.70A (GMA).*

18 *Community and human services policies are included under Chapter IV, "Community*
19 *Character and Open Space," and transportation policies are included under Chapter III,*
20 *"Transportation." Several countywide planning efforts provide direction for achieving the*
21 *integration of services, aquifer and natural resource protection, and land use planning.*
22 *These include the Coordinated Water System Plans, Seattle Regional Comprehensive Water*
23 *Supply Plan, Groundwater Management Plans, Basin Plans, Chelan Agreement Regional*
24 *Water Resources Planning Process, Flood Hazard Reduction Plan, Wastewater 2020 Plus,*
25 *Human Services Strategies Report, and the King County Sewerage General Plan.*
26 *Furthermore, there are state mandates which affect the provision of services. For example,*
27 *water resource allocation must accommodate all reasonable out-of-stream needs and*
28 *maintain sufficient flows for in-stream uses. The following policies transcend Urban and*
29 *Rural land use designations and apply countywide.*

30 1. Urban Services Required as Growth Occurs

31 CO-1. Jurisdictions shall identify the full range of urban services and how they plan to
32 provide them.

33 2. Conservation, Efficiency, Cost Effectiveness and New Technologies

34 CO-2. Jurisdictions and other urban service providers shall provide services and
35 manage natural resources efficiently, through regional coordination, conjunctive use of

resources, and sharing of facilities. Interjurisdictional planning efforts shall evaluate approaches to share and conserve resources.

CO-3. Service provision shall be coordinated to ensure the protection and preservation of resources in both rural areas and in areas that are developing, while addressing service needs within areas currently identified for growth.

CO-4. All jurisdictions acknowledge the need to develop a regional surface water management system which crosses jurisdictions boundaries and identifies and prioritizes program elements and capital improvements necessary to accommodate growth and protect the natural and build environment. The GMPC shall develop and recommend a financing and implementation strategy to meet this need.

CO-5. Water supply shall be regionally coordinated to provide a reliable economic source of water and to provide mutual aid to and between all agencies and purveyors. The region should work toward a mechanism to address the long-term regional water demand needs of all agencies and water purveyors.

CO-6. Aggressive conservation efforts shall be implemented to address the need for adequate supply for electrical energy and water resources, protect natural resources, and achieve improved air quality. Efforts shall include, but not be limited to, public education, water reuse and reclamation, landscaping which uses native and drought-resistant plants and other strategies to reduce water consumption, small lot size, low-flow showerheads, conservation credits, and energy efficiency incentives in new and existing buildings.

CO-7. Water reuse and reclamation shall be encouraged, especially for large commercial and residential developments, and for high water users such as parks, schools, golf courses, and locks.

CO-8. When planning for the future demand on wastewater treatment and conveyance, alternatives to the expansion of the Metro centralized system such as decentralized treatment and other treatment technologies, and wastewater reclamation and reuse shall be identified and incorporated into plans as viable options.

CO-9. The presence of tightline sewers or availability of sewer pipeline capacity and water supply above what is required to meet local needs shall not be used to justify development counter to the countywide policies, and any such land use development proposal shall be denied by the permitting agency.

B. Urban Areas Identified for Growth for the Next Ten Years

The designation of the Urban Growth Area establishes the service area for the county. The detailed arrangement and timing of services and the installation of infrastructure improvements is left to be determined through shorter-term capital improvement plans. To

1 support the densities and land uses of urban areas identified for immediate development,
2 urban water and sewer systems are essential to support growth anticipated in the Urban Area
3 over the next ten years. Urban water systems are defined as a network of pipes which are
4 designed to meet all user needs and provide fire protection. Urban sewer systems are defined
5 as a system of pipes providing conveyance to a sewage treatment facility.

6 **1. Urban Water and Sewer Systems Required**

7 CO-10. In the Urban Area identified for growth within the next ten years, urban water
8 and sewer systems are preferred for new construction on existing lots and shall be required for
9 new subdivisions. However, existing septic systems, private wells, and/or small water systems
10 may continue to serve the developments so long as densities and physical conditions are
11 appropriate, the systems are allowed by the relevant jurisdictions, and management keeps the
12 systems operating properly and safely.

13 **C. Urban Areas Designated for Growth Beyond 2002**

14 *In urban areas designated for growth beyond 2002, there will be a mix of existing*
15 *services which may or may not be at urban service levels. The appropriate infrastructure*
16 *improvements for sewer and water systems will vary according to existing site conditions.*
17 *New developments should occur contiguous to existing, fully-developed areas so that*
18 *extension of services occurs in an orderly and cost-effective manner.*

19 **1. Phased and Cost Effective Extension of Urban Water and Sewer Systems**

20 CO-11. To the extent practicable, all new plats shall be contiguous to the areas
21 identified for growth for the next ten years. The phased expansion should respect basin
22 boundaries or other natural landscape features.

23 CO-12. Preferred sewer and water systems in areas designated for growth beyond
24 2002 are community drainfields and water systems which are professionally managed. These
25 systems shall be designed, sited, and built to facilitate eventual conversion to urban sewer and
26 water systems. Jurisdictions shall require all known and projected costs of infrastructure
27 improvement to urban service levels be funded at the permitting stage.

28 CO-13. Urban sewer system extensions in unincorporated King County shall be
29 permitted consistent with the provisions of the King County Sewerage General Plan,
30 countywide policies, and the policies of the jurisdiction in whose potential annexation area the
31 extension is proposed.

32 **D. Rural Areas and Resource Lands**

33 *Residents in rural areas and resource lands need to have many of the same types of*
34 *services as urban areas. However, the service standards in rural areas and resource lands*
35 *are not at Urban levels. Rural water systems are defined as individual or community wells or*

1 *piped water systems designed to meet all user needs but, in most cases, not providing for fire*
2 *protection.*

3 **1. Limited Extension of Urban Water and Sewer Systems**

4 CO-14. Sewer expansion shall not occur in rural areas and resource lands except
5 where needed to address specific health and safety problems threatening structures permitted
6 before July 1, 1992 or the needs of public facilities such as schools. Sewers may be extended
7 only if they are tightlined and only after a finding is made that no alternative technologies are
8 feasible. Mechanisms to reduce cost and limit the number of individual hookups shall be
9 explored and actions recommended to the GMPC.

10 CO-15. ~~((Urban water system extensions shall not be permitted in rural areas and~~
11 ~~resource lands except to solve immediate health or safety problems threatening existing resi-~~
12 ~~dents. If urban water systems are extended, the maximum number of hookups that is consis-~~
13 ~~tent with the countywide land development pattern shall be specified at the time of the~~
14 ~~extension.))~~ Urban Water system extensions are not preferred in rural areas. However, Group
15 A water systems are permissible under the following criteria:

16 a. Group A service is financially feasible at rural densities and shall not be justifi-
17 cation for any increase in residential density and prior to approval, the specific number of rural
18 connections shall be specified for the line or system for the total rural area being served; and

19 b. The area has either been approved for Group A service through a King
20 County-adopted water system plan or has been designated for Group A service through prior
21 establishment of a utility local improvement district or other financial mechanisms; or

22 c. Water quality or quantity problems that threaten public health exist which can
23 best be solved by Group A services; and

24 d. A previously developed property abuts a Group A water system.

25 CO-16 All rural water systems outside existing service areas (planning areas) shall be
26 professionally managed by the applicable water purveyor according to the satellite management
27 procedures of the Coordinated Water System Plans, and designed to rural standards. Rural
28 water systems should be provided through private wells or small public systems. In the Rural
29 Area, all new public water systems should be inspected by a licensed water system operator. If
30 the area is included in the planning area of an existing water purveyor as identified in
31 Coordinated Water System Plan, the water system shall be operated by the purveyor through
32 either satellite management arrangement or by direct service.

33 **VII. SITING PUBLIC CAPITAL FACILITIES OF A COUNTYWIDE Or**
34 **STATEWIDE NATURE**

1 Public capital facilities of a countywide or statewide nature generally have
2 characteristics that make these facilities extremely difficult to site. Such characteristics
3 include the number of jurisdictions affected or served by the facility, the size of the facility,
4 and the facility's potential adverse impacts, such as noise, odor, traffic, and pollution genera-
5 tion. The facilities can be either desirable or undesirable to jurisdictions. Some of the
6 facilities are privately owned and regulated by public entities. Facilities also can be owned
7 by the state and used by residents from throughout the state, such as universities and their
8 branch campuses.

9 The county and the cities need to develop a process for siting public capital facilities
10 with these types of characteristics, including but not limited to, utility and transportation
11 corridors, airports, wastewater treatment plants, solid waste landfills, higher educational
12 facilities, correctional and in-patient treatment facilities and energy-generating facilities.

13 FW-28. Public capital facilities of a countywide or statewide nature shall be sited to
14 support the countywide land use pattern, support economic activities, mitigate environmental
15 impacts, provide amenities or incentives, and minimize public costs. Amenities or incentives
16 shall be provided to neighborhoods/jurisdictions in which facilities are sited. Facilities must be
17 prioritized, coordinated, planned, and sited through an interjurisdictional process established by
18 the GMPC.

19 S-1. The Growth Management Planning Council shall establish a process by which all
20 jurisdictions shall cooperatively site public capital facilities of a countywide or statewide
21 nature. The process shall include:

- 22 a. A definition of these facilities;
- 23 b. An inventory of existing and future facilities;
- 24 c. Economic and other incentives to jurisdictions receiving facilities;
- 25 d. A public involvement strategy;
- 26 e. Assurance that the environment and public health and safety are protected;

27 and

28 f. A consideration of alternatives to the facility, including decentralization,
29 demand management, and other strategies.

30 **VIII. ECONOMIC DEVELOPMENT AND FINANCE**

31 **A. Economic Development**

32 ED-1 By December 1, 1992, the GMPC shall adopt Economic Development policies
33 which:

- 34 a. Establish the county's role in the regional economy;
- 35 b. Maintain a strong economic base within King County;

- 1 c. Encourage diversification of the economy;
2 d. Maintain an adequate supply of land to support future economic
3 development;
4 e. Identify geographic areas to target public resources promoting
5 economic development;
6 f. Foster job training opportunities to maintain a highly educated work
7 force;
8 g. Protect the natural environment as a key economic value in this region;
9 h. Consider the special needs of economically disadvantaged citizens and
10 neighborhoods; and
11 i. Include the assistance of private sector.

12 ED-2 By July 1, 1993 regional planning shall produce a regional industrial siting
13 policy based on a regional assessment of the need for industrial zoned land and the availability
14 of transportation and other infrastructure to serve it.

15 ED-3 Jurisdictions' comprehensive plans shall include economic development policies.
16 These policies shall address the local economic concerns of each jurisdiction within the
17 context of a regional economic development strategy.

18 ED-4 Each jurisdiction's comprehensive plan shall include an economic development
19 element which will include an estimate of the type and number of jobs to be accommodated in
20 the jurisdiction during the next 20 years.

21 ED-5 The county shall work with Snohomish and Pierce Counties to develop a joint
22 20-year regional economic development strategy.

23 Definition of Economic Development

24 Economic Development is growth and change in the economy whereby the economic
25 health of the region--its people, its business, its governments--is enhanced. An important
26 component of achieving Economic Development is through the purposeful undertaking of
27 public and private actions designed to achieve:

28 --the maintenance of a strong economic base;

29 --a diversification of the economy;

30 --improved job training and educational opportunities;

31 --the protection of the natural environment;

32 --the empowerment of economically disadvantaged citizens and neighborhoods;

33 --a partnership between the private and public sectors;

34 --the maintenance and creation of higher (family) wage jobs.

1 This element of the Countywide Planning Policies is intended to provide a vision and
2 policy direction for King County jurisdictions.

3 NEW FW The Growth Management Planning Council or its successor and
4 jurisdictions shall develop monitoring and evaluation systems, including benchmarks, by which
5 they can evaluate performance in achieving the goals of their Comprehensive Plans.

6 **1. Strengthen, Expand, and Diversify the Economy**

7 NEW ED-1 Local jurisdictions plans shall include policies that actively support the
8 retention and expansion economic base of the multicounty region. Local jurisdictions and the
9 County shall work cooperatively on a regional basis and invite private sector participation to
10 evaluate the trends, opportunities and weaknesses of the existing economy and to analyze the
11 economic needs of key industries.

12 Local jurisdictions' comprehensive plans shall include policies intended to foster:

13 a. the development and retention of those businesses and industries which
14 export their goods and services outside the region. These businesses and industries are critical
15 to the economic strength and diversification of the economy;

16 b. a business climate which is supportive of business formation, expansion,
17 and retention and recognizes the importance of small businesses in creating new jobs.

18 NEW ED-2 Jurisdictions shall cooperate to establish economic diversification and
19 development goals for the multicounty region. Jurisdictions shall, in process of comprehensive
20 planning, identify the contribution they will make to the regional diversification and
21 development goals.

22 NEW ED-3 Where appropriate, jurisdictions' plans shall include policies intended to
23 attract and retain industries, firms and jobs, within their locally determined or zoned
24 manufacturing and industrial areas.

25 NEW ED-3a Jurisdictions shall recognize businesses, facilities, and institutions within
26 their boundaries that provide opportunities to maintain economic stability and realize economic
27 growth for the entire region. These include major educational facilities, research institutions,
28 health care facilities, value added manufacturing facilities and port facilities among others. The
29 County and local jurisdictions shall encourage these institutions, businesses and facilities to
30 thrive while maintaining the environmental and other goals of the local comprehensive plans.

31 **2. Environment**

32 NEW ED-4 Jurisdictions shall adopt economic development and other policies
33 which will recognize and help protect the environment as a key economic value in the region.
34 Local policies shall seek to achieve an appropriate balance between the needs for economic
35 growth and the need for protecting the environment. Local governments are encouraged to

1 look for ways to work cooperatively with businesses to help them comply with environmental
2 regulations and to develop policies that result in environmental protection through regulatory
3 processes that are understandable and efficient.

4 NEW ED-5 In cooperation with water and electricity providers, local jurisdictions,
5 including sewer and water districts, shall encourage programs for water and power conser-
6 vation in public facilities and in the private sector.

7 **3. Human Resources: Economically Disadvantaged Citizens and Neighborhoods,**
8 **Job Training and Education**

9 ED-6 Jurisdictions' comprehensive plans shall address the historic disparity in income
10 and employment opportunities for minorities, women and economically disadvantaged indi-
11 viduals. Jurisdictions shall develop strategies and support community-based actions to involve
12 minorities, women and economically disadvantaged individuals in improving their economic
13 future. The plans shall recognize their special needs and each jurisdiction should commit,
14 based on their plans, resources in human services, community development, housing, economic
15 development and the public infrastructure, to address the inequalities referred to above.

16 ED-7 Job training, retraining, and educational opportunities are critical to develop and
17 maintain a highly skilled workforce. Jurisdictions shall cooperate in efforts to meet these
18 training and educational needs on a countywide basis by facilitating the implementation of
19 programs to meet the educational and training needs and to identify partnerships and funding
20 opportunities where appropriate.

21 **4. Direct Governmental Actions: Land Supply, Infrastructure, and Permitting**

22 ED-8 Jurisdictions shall cooperate on a countywide basis to inventory, plan for, and
23 monitor the land supply for commercial, industrial, institutional, resource and residential uses.
24 Local jurisdictions shall, in five year increments, for the next 20 years identify the amount,
25 character and uses of land needed to achieve the jurisdictions' job growth goals;

26 ED-9 Local comprehensive plans should include policies which foster a climate
27 supportive of the siting needs of industrial users and that recognize the important role they play
28 in creating high-wage jobs. Local plans are encouraged to include policies designed to ensure
29 that industrial use of industrial-zone land is not unduly encroached upon or limited by non-
30 supporting or incompatible uses.

31 Local policies and plans are encouraged to support the continued availability of
32 land for those industrial and supporting or compatible activities dependent on critical
33 infrastructure as identified in local comprehensive plans. Jurisdictions should consider zoning
34 or other means to provide opportunities for those uses in areas where infrastructure facilities
35 can be utilized to exploit the economic benefit of that infrastructure.

1 ED-10 Jurisdictions are encouraged to promote the siting of resource-based and agri-
2 cultural-based industrial activities close to the location of the natural resource whether outside
3 or inside the urban growth boundary. Jurisdictions are encouraged to recognize forest land as
4 a sustainable economic resource.

5 ED-11 Where jurisdictions, including water and sewer districts, have responsibility to
6 provide infrastructure and/or services or to plan for them they shall include the goals of eco-
7 nomie development as an important part of their decision making process.

8 ED-12 Jurisdictions shall cooperatively develop funding strategies for governmental
9 infrastructure which take into account economic development goals, and consider the costs
10 and benefits for the jurisdictions, and the region.

11 ED-12a Jurisdictions shall seek state legislative approval of state funding and
12 regulatory strategies to fund environmental clean-up of industrial sites. Jurisdictions shall
13 work together on a collaborative basis to develop alternative local, county and state financing
14 and regulatory strategies to assist with the funding of environmental clean-up of industrial
15 sites.

16 ED-13 Jurisdictions shall identify geographic areas that can be developed or redevel-
17 oped into manufacturing/industrial areas, and coordinate with utility providers to build the nec-
18 essary infrastructure. Jurisdictions are encouraged to provide public incentives to promote
19 basic employment associated with manufacturing.

20 ED-14 To maintain the economic vitality of King County, regulatory reform must
21 occur with the implementation of GMA requirements. To carry out this goal, jurisdictions
22 shall adopt permitting processes with defined time periods for prompt approval of projects that
23 conform with the local jurisdiction's development regulations. To carry out this policy the
24 following actions shall be taken:

25 a. No later than January 1996, jurisdictions shall identify to the GMPC or
26 its successor current permit process timeframes and barriers to speedy permit approval, includ-
27 ing discussion of operational and cost considerations.

28 b. Eliminate redundant permit reviews and appeals;

29 c. Establishing consistent mitigation requirements containing clear
30 standards, and facilitating projects that meet these established standards;

31 d. Focusing the scope of public appeal processes for a project to those
32 issues that relate directly to specific impacts of the project; and

33 e. Adopting procedures to perform concurrent permit review whenever
34 possible.

1 ED-16 Jurisdictions may prepare non-project environmental impact statements to
2 address, in a comprehensive manner, the probable significant adverse impacts of future
3 development.

4 ED-17 Jurisdictions are encouraged to establish a master utility permit process in con-
5 junction with approval of land use permits such as short plats, subdivisions and master planned
6 developments. Utilities may include both publicly and privately owned utilities for electricity,
7 natural gas, water, sanitary sewer, surface water management and telecommunications. All
8 utility extensions and required new construction may be reviewed as part of the master utility
9 permit.

10 **5. Private/Public Partnerships**

11 ED-18 Jurisdictions shall foster the development and use of private/public partnerships
12 to implement economic development policies, programs and projects.

13 **B. Finance**

14 *A fiscal analysis is required by the GMA. This section of policies is intended to bring*
15 *together references to financial matters found in earlier chapters see Chapter II, "Rural*
16 *Area" and "Urban and Manufacturing/Industrial Centers," Sections B and D) and to provide*
17 *direction for the fiscal analysis of the anticipated results of implementing the countywide*
18 *planning policies.*

19 FW-32 To implement the Countywide Planning Policies, jurisdictions shall
20 cooperatively identify regional funding sources and establish regional financing strategies by
21 July 1, 1993. Such strategies shall consider the infrastructure and service needs of Urban
22 Centers, Manufacturing Industrial Centers, Activity Areas, Business/Office Parks, other
23 activity concentrations, and rural areas. Such strategies shall also provide incentives to
24 support the Countywide Planning Policies and should:

25 a. Make existing and newly identified funding sources respond in the most
26 flexible way to meet countywide needs;

27 b. Ensure that a balance of services is available countywide to meet,
28 among others, human service, public safety, open space and recreation, education, and
29 transportation needs; and

30 c. Evaluate current revenue and service demands and the potential for
31 more effective coordination of service delivery.

32 RFS-5. All jurisdictions shall adopt policies, to stimulate construction or preservation
33 of affordable housing in centers, infill and redevelopment areas.

34 RFS-6 Each city with a potential annexation area shall enter into an interlocal
35 agreement with the County for defining service delivery responsibilities. A financing plan for

1 investments in the annexation areas, mutually pursued, shall be included in the interlocal
2 agreement for capital facilities and service delivery. Level of service standards and financial
3 capacity should be considered for each area, together with density issues and phasing of
4 developments.

5 FW-34 In order to implement the Countywide Planning a Regional Governance Plan
6 shall be adopted by King County and the Cities. This plan shall be developed in a collaborative
7 process with local jurisdictions, special districts, citizens and business representing a broad
8 range of stakeholders. This proposal shall:

- 9 a. Evaluate opportunities for government consolidation.
10 b. Match service responsibilities of jurisdictions with the fiscal capacity to
11 maintain services at the level desired by taxpayers; and
12 c. Define appropriate regional and local responsibilities for service delivery.

1
2

APPENDIX 1
Urban Growth Areas Map

A-75

May 7, 1994

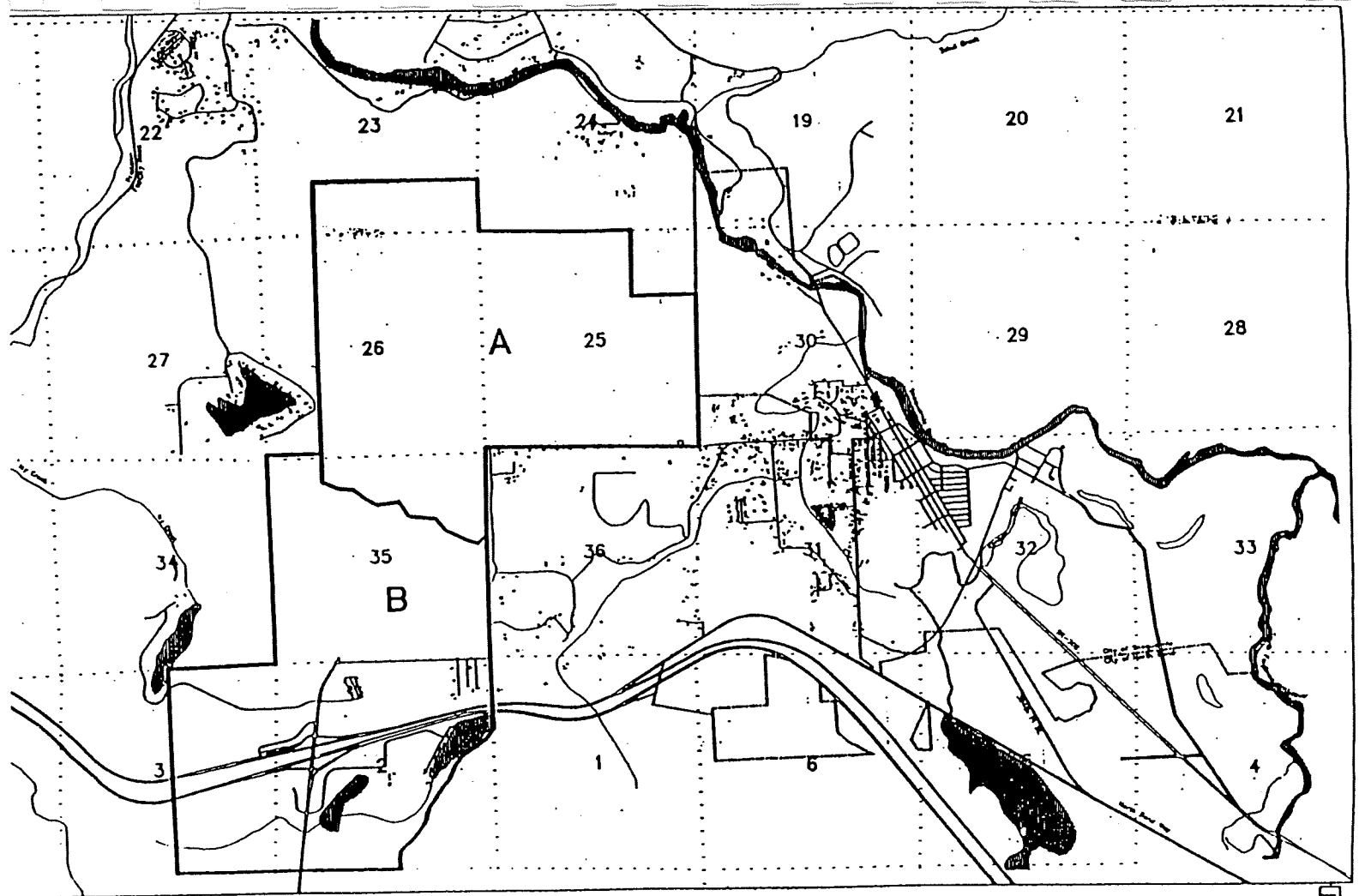
Introduced by: Brian Derdowski

Revised May 11, 1994

AMENDMENT TO PROPOSED
POTENTIAL ANNEXATION AREA FOR CITY OF SNOQUALMIE

1 In the blue packet discussing the Proposed Potential Annexation Areas for the Edge and
2 Rural Cities, remove the portion of the Potential Annexation Area for the City of
3 Snoqualmie which covers the SR-18/I-90 interchange (shown on the attached map as Area
4 B), and designate the area addressed by the Interlocal Agreement between the City of
5 Snoqualmie and King County (dated February 12, 1990) agreeing to jointly plan for the area
6 as Rural..

7
8 Rationale: In the Interlocal Agreement entered into between the City of Snoqualmie and
9 King County in February of 1990, which followed extensive negotiations during the
10 adoption process for the Snoqualmie Valley Community Plan, the City and the County
11 agreed that only rural density uses which would not preclude the City's future options for
12 the area would be allowed in the Area shown as Area B on the attached map. This
13 agreement should be honored. Designation of the area as Urban at this time is premature
14 and contradicts the agreement.



ATTACHMENT 2: AREA COVERED BY AGREEMENT

- EA A - Annexation Area
- EA B - Joint Planning Area

APPENDIX 2

Household and Employment Targets

16-May-94

Proposed Growth Targets for Households and Employment

CITIES	Net New Households MINIMUMS	Net New Employment
Algona	404	350
Auburn	8,082	11,100
Beaux Arts	0	0
Bellevue	8,575	28,250
Black Diamond	1,033	1,200
Bothell (KC part)	1,931	2,900
Burien	1,796	450
Carnation	404	0
Clyde Hill	12	0
Des Moines	1,796	2,500
Duvall	1,886	1,700
Enumclaw	2,626	1,000
Federal Way	14,996	14,800
Hunts Point	4	0
Issaquah	2,694	4,300
Kent	6,735	11,500
Kirkland	5,837	8,600
Lake Forest Park	135	200
Medina	17	0
Mercer Island	1,122	1,700
Milton	18	0
Normandy Park	135	0
North Bend	1,527	2,050
Pacific	1,212	100
Redmond	11,458	29,509
Renton	8,890	23,000
SeaTac	3,592	15,800
Seattle	53,877	132,700
Skykomish	27	0
Snoqualmie	2,784	4,500
Tukwila	5,388	22,250
Woodinville	1,796	1,950
Yarrow Point	18	0
City Totals	150,803	322,409
Uninc. KC	44,897	25,000
GRAND TOTAL	195,700	347,409

hh&emp-t.wk3/nm

Source: Growth Management Planning Council, May 14, 1994.

APPENDIX 3

Affordable Housing Index

AFFORDABLE HOUSING JOBS/HOUSING INDEX

The Jobs/Housing Index was developed by the Affordable Housing Technical Forum as a way to adjust housing targets based on each jurisdiction's existing concentrations of low-cost housing and low-wage employment. A Low-Wage Jobs Index greater than one indicates that the proportion of lower wage employment is greater than the county average; a Low-Cost Housing Index greater than one indicates that the proportion of lower cost housing is less than the county average. The Jobs/Housing Index is computed by multiplying the jobs and housing indexes together.

Policy AH-2 establishes planning targets for housing affordable to households with incomes between 0 and 50 percent of the county median income. Based on the Jobs/Housing Index, jurisdictions should plan for a number of units that is either 20 or 24 percent of projected net new housing units, as follows:

Jobs/Housing Index greater than one: 24 percent.

Jobs/Housing Index less than one: 20 percent.

Jurisdiction for which Index could not be computed (shown as NA): 20 percent.

Jurisdiction	Low-Wage Jobs		Low-Cost Housing		Jobs/Housing Index
	Jobs	Index	Units	Index	
Algona	73	0.85	406	0.61	0.52
Auburn	5,362	0.83	9,245	0.65	0.54
Beaux Arts	NA	NA	3	20.74	NA
Bellevue	22,297	1.08	12,801	1.39	1.50
Black Diamond	59	1.28	259	0.73	0.93
Bothell	1,691	1.19	1,704	1.2	1.43
Carnation	64	0.85	248	0.81	0.69
Clyde Hill	31	0.52	21	26.07	13.56
Des Moines	1,564	1.27	4,473	0.74	0.94
Duvall	56	0.87	229	1.74	1.51
Enumclaw	1,174	1.17	2,106	0.65	0.76
Federal Way	6,384	1.26	14,107	0.89	1.12
Hunts Point	0	0	7	14.14	NA
Issaquah	1,676	1.17	1,594	1.01	1.18
Kent	8,067	0.78	11,526	0.69	0.54
Kirkland	5,472	1.17	6,955	1.17	1.37
Lake Forest Pk.	554	1.28	251	2.98	3.81
Medina	25	0.91	54	10.67	9.71
Mercer Island	1,697	1.11	1,227	3.21	3.56
Milton	NA	NA	77	1.08	NA
Normandy Park	352	1.23	488	2.68	3.30
North Bend	506	1.15	595	0.84	0.97
Pacific	147	0.85	1,107	0.67	0.57
Redmond	7,296	0.96	5,103	1.34	1.29
Renton	9,675	0.77	11,999	0.75	0.58
SeaTac	4,497	0.91	6,528	0.69	0.63
Seattle	129,451	1.02	134,526	0.87	0.89
Skykomish	NA	NA	72	0.63	NA
Snoqualmie	444	1.18	426	0.74	0.87
Tukwila	10,875	0.85	4,256	0.65	0.55
Yarrow Point	0	0	17	11.2	NA
Cities	219,489	1.00	232,410	0.91	0.91
Uninc. KC	32,885	1.03	66,775	1.32	1.36
KC TOTAL	252,374	1.00	299,185	1.00	1.00

Source: King County Planning and Community Development Division, 1993.

Ultriquino
17-Mar-93

Notes

1. Low-wage jobs are estimated using Puget Sound Regional Council employment data for five sectors, converted to lower income quartile households. King County Planning and Community Development, 1992.
2. Proportion of low-wage jobs relative to the county average.
3. Rental housing units with rents less than \$700 per month, plus owned housing units valued at less than \$100,000, in 1990 dollars. 1990 Census.
4. Proportion of low-cost housing relative to the county average.
5. Low-wage jobs index (2) multiplied by the low-cost housing index (4).

APPENDIX 4

TRANSPORTATION: Requirements of the Growth Management Act

Countywide Policies (RESHB 1025, Section 2)

Countywide planning policies must be adopted by July 1, 1992 to provide a framework from which consistent county and city comprehensive plans will be developed. Policies for transportation must address:

1. Policies for promotion of contiguous and orderly development and provision of urban services to such development [32.2 (3) (b)];

2. Policies for siting public capital facilities of a countywide or state-wide nature [32.2 (3) (c)];

3. Policies for countywide transportation facilities and strategies [32.2 (3) (d)];

4. Policies for joint county and city planning within growth areas [32.2 (3) (f)];

5. An analysis of the fiscal impact. [32.2 (3) (h)].

Comprehensive Plans (RCW 36.70A.070)

The transportation element of comprehensive plans adopted by the county or cities

will be measured against the policies and standards approved and ratified as part of the

countywide framework plan. By July 1, 1993 the county and cities are required to adopt a

comprehensive plan with a mandatory transportation element that includes the following

sub-elements:

1. Land use assumptions used in estimating travel demand;

2. Facility and service needs for attaining and sustaining level-of-service

standards for arterials and transit routes;

3. Six-year financing plan based upon the needs of the comprehensive plan;

reassess land use element if level-of-service standards cannot be met with funding resources;

this plan will be updated and adopted annually;

4. Intergovernmental coordination with adjacent jurisdictions;

5. Transportation Demand Management strategies.

Within one year of adopting a comprehensive plan, the county and cities are required

to meet:

1. Adequacy Requirements: Adopt an ordinance which prohibits development

approval if the development causes the level-of-service to decline below the standard adopted

in the transportation element.

2. Concurrency Requirements: Deny development unless improvements or

strategies to accommodate the impacts of development can be in place at the time of

1 development or a financial commitment is in place to complete the improvements or strategies
2 within six years.

3 Other Laws and Regulations

4 Federal law requires an on-going cooperative, continuous and comprehensive
5 transportation planning process as a condition of federal transportation grants. To comply
6 with this requirement, the designated Metropolitan Planning Organization (MPO) is
7 responsible for long-range transportation planning and short-range transportation improve-
8 ment programming (TIP).

9 The MPO planning and programming responsibilities are strengthened and enhanced
10 under the recent re-authorization of the Federal Surface Transportation Act. The Inter-modal
11 Surface Transportation Efficiency Act of 1991 (ISTEA) eliminates several categorical funding
12 programs and creates a new flexible Surface Transportation Program (STP) and a new
13 Congestion Mitigation Program. Funds available to the region under these two highway

14 programs may be used for multi-modal solutions; and the MPO has project selection
15 authority for these programs, as well as the federal transit program funds for the region. In
16 addition, Washington State Department of Transportation's (WSDOT) project selections
17 under the Interstate Maintenance, Bridge, and National Highway System (NHS) programs
18 must be made in cooperation with the MPO and in conformance with the regional
19 Transportation Improvement Program (TIP).

20 The Federal Clean Air Act Amendment (CAA) of 1990 requires substantial reduction
21 of emissions from the transportation sector. The Puget Sound Regional Council's
22 transportation plans and projects must conform to Transportation Control Measures
23 contained in the State Implementation Plan (SIP) prepared by the Puget Sound Air Pollution
24 Control Agency. The current strategy for meeting CAA vehicle emissions requirements
25 include:

- expanded inspection and maintenance program, and
- a regional implementation of the Commute Trip Reduction Law cited below.

28 The State Commute Trip Reduction Law of 1991 requires reductions in vehicle miles
29 traveled. Employers of 100 or more employees are directed to reduce work travel demand by
30 35 percent by 1999. Ordinances adopted by the county and cities must be coordinated with
31 transit agencies, regional planning organizations and major employers; and they must be
32 consistent with commute trip reduction plans of neighboring jurisdictions.

33 State law provides for the development of a High Capacity Transit (HCT) system

34 within the Puget Sound Area. The law requires that transit agencies (Metro, Pierce Transit,
35 Snohomish, Community Transit and Everett Transit) jointly plan the implementation of such a

1 *system. For that purpose, the Joint Regional Policy Committee was formed and charged with*
2 *the responsibility of recommending a system plan and financial program that would*
3 *implement the HCT system. This plan is being developed in support of the Vision 2020*
4 *Regional Growth Strategies; this vision calls for creation of a regional system of central*
5 *places linked by High Capacity Transit facilities, and an interconnected system of freeway*
6 *High Occupancy Vehicle (HOV) lanes.*

7 *The 1990 State Legislature passed various legislation granting local governments*
8 *authority to establish a number of taxing programs for funding transportation projects and*
9 *programs. An interim and informal group called the Local Options Strategy Development*
10 *Steering Committee was formed to recommend how these funding authorities should be*
11 *exercised. This initial work was completed in September of 1991 with a comprehensive*
12 *recommendation as to how each funding source should be assigned. As local jurisdictions*
13 *take actions on these recommendations, it would be useful to re-convene this Steering*
14 *Committee or a similar group for coordinating transportation funding decisions.*

GROWTH MANAGEMENT PLANNING COUNCIL
Introduced Amendments to the Countywide Planning Policies
May 16, 1994

CHAPTER NAME	POLICY	DESCRIPTION
Framework	FW-1 5d	UGA amendment process, permits urban designation in exchange for open space
	FW-1	Delete CPP adoption process – establish adoption of local targets
	FW-1 d	Jobs and housing to accommodate growth targets rather than projections
Land Use	Preamble	Describes the variety of urban centers; describes targets for 20 years of growth
	LU-29	Link relationship between zoning and long-term center development
	ED-12	State approval for funding of clean-up sites
Fiscal	FW-33	Regional Finance Plan to be prepared by July 1996
	RFS-1	Requires use of Regional Economic Strategy goals when developed
	RFS-2	Attention to subsidize infrastructure to support redevelopment
	RFS-3	Ask state to allow site assemble
	RFS-4	Tax Increment Financing for Urban Centers
	Urban Growth	
	Area Map	Adopt Amendments to UGA per city/county negotiations

A-2
new Step 5

NEW AMENDMENT: (NOT
IN PACKET) ON 4-1 UG,
FW-1 Step 5(d)
Introduced By: Gary Locke

May 12, 1994

Countywide Planning Policy Amendments

On page 7, line 7, through page 8, line 27 of the Countywide Planning Policies as adopted July 6, 1992 and reprinted on legislative paper, FW-1 shall be amended to read as follows:

Step 5d The Countywide Planning Policies are based on an urban centers strategy and a permanent Urban Growth Area. To reinforce the permanence of the Urban Growth Area and to further support the centers concept, King County shall actively pursue dedication of open space along the Urban Growth Area boundary with a goal of creating a contiguous band of open space north and south along the Urban Growth Area boundary. This program shall follow the 1994 adoption of the Urban Growth Area and last until December 31, 1996.

Land added to the Urban Growth Area through this program will be based only on the criteria established in this policy. Changes to the Urban Growth Area that do not conform to the criteria established in the policy will be considered every 10 years as outlined in Step 5c.

1. Land can only be added to the Urban Growth Area in exchange for a dedication of permanent open space to the King County Open Space System. The dedication must consist of a minimum of four acres of open space dedicated for every one acre of land added to the Urban Growth Area, calculated in gross acres.

1 2. Land added to the Urban Growth Area adapted in the 1994 Countywide
2 Planning Policies must be physically contiguous to the existing Urban
3 Growth Area, and must be able to be served by sewers and other urban
4 services. Development should be at urban densities..

5
6 3. The total urban area increased as a result of this policy shall not exceed
7 4,000 acres.

8
9 4. Development on the land added to the Urban Growth Area under this
10 policy shall be limited to residential development. Proposals shall meet
11 King County Comprehensive Plan density and affordable housing goals
12 with additional consideration given to proposals that include innovative
13 local vernacular architectural and site planning features.

14
15 5. Open space on individual properties should be dedicated in such a way
16 that it can connect with open space on adjacent properties. Open space
17 areas should generally parallel the urban-rural line, taking into account
18 #11 below.

19
20 6. The minimum depth of the open space buffer between the proposed
22 addition to the Urban Growth Area and the Rural Area shall be at least
24 one-half of the property width.

1 7. The minimum size of property to be considered will be 20 acres, which
2 includes both the proposed addition to the Urban Growth Area and the
3 land proposed for open space dedication. Smaller properties may be
4 combined to meet the 20 acre criteria.

5
6 8. Proposals for open space dedication and urban development must be
7 received within 1 year of the date of the ratification of these policies.
8 Review of these applications shall begin by King County after the 1 year
9 period and conclude within 2 years of the date of ratification of these
10 policies.

11
12 9. Where applications are adjacent to city boundaries or potential
13 annexation areas, King County shall solicit recommendations from the
14 city.

15
16 10. Proposals will be reviewed for quality of open space and urban
17 development, with the highest quality proposals being approved by King
18 County. If the 4,000 acre limit on land added to the urban Growth Area
19 is not needed in the first round of proposals, due to either insufficient
20 number of proposals or insufficient quality, a second round of
22 applications will be accepted. King County will set the application and
24 review periods at the time of the second round.

25
26 11. The open space land shall be dedicated at the time urban zoning is
27 applied. The open space lands that will be evaluated most favorably are
28 those that include:
29
30

- a. the highest quality habitat areas;
- b. connection to regional open space systems;
- c. protection of wetlands, stream corridors and water bodies;
- d. unique natural features; and
- e. large dedications that are part of a contiguous open space system.

Rationale: To reinforce the permanence of the Urban Growth Area, King County should actively pursue the creation of a contiguous bank of open space along the urban growth boundary. This amendment will allow rural properties abutting the urban-rural line to partially develop at urban densities if their remainders are dedicated as permanent public open space. The minimum ratio of developed area to permanent open space would be 1:4. The amendment will provide a large amount of public open space, which will help create a permanent, physical demarcation of the urban and rural areas.

pols7

A-2

May 10, 1994

INTRODUCED BY: Gary Locke

Countywide Planning Policies Amendment

On page 7, line 7, through page 8, line 27, of the Countywide Planning Policies as adopted July 6, 1992 and reprinted on legislative paper, FW-1 shall be amended to read as follows:

FW-1 Countywide growth management is a multi ~~five~~-step process:

STEP 1: The Countywide Planning Policies became ~~shall become~~ effective October 1992, upon adoption by the King County Council and ratification by at least thirty percent of the city and county governments representing seventy percent of the population in King County. ~~-(September-1992 target-date)~~

STEP 2: The Growth Management Planning Council (GMPC) reconvened to conduct environmental and fiscal analysis of the Countywide Planning Policies and to consider policy amendments developed through implementation of tasks specified in the Countywide Planning Policies. These actions are considered the Phase 2 policy amendments and include:

a. Designation of Urban Centers according to the procedures and criteria established in policies LU-28 and LU-29;

1 ~~c.-----The GMPC shall adopt 20-year target numbers for projected~~
2 ~~employment growth and capacity based on Urban Centers~~
3 ~~decisions, the criteria established in policy LU 53, and employment~~
4 ~~ranges recommended by an interjurisdictional staff committee.~~
5 ~~((December 1992 target date))~~

6
7 ~~d.-----Housing and jobs to accommodate King County's projected~~
8 ~~population shall be planned in the context of carrying capacity of~~
9 ~~the land.---Housing density and affordability shall be considered co-~~
10 ~~equal objectives.~~

11
12 ~~e.-----The GMPC shall confirm the Urban Growth Areas based on Centers~~
13 ~~designations and subarea population and employment targets,~~
14 ~~insuring sufficient capacity within the Urban Growth Area to meet~~
15 ~~projected growth.---(December 1992 target date)~~

16
17 STEP 3: The Countywide Planning Policies shall be implemented as follows:

18
19 a. All jurisdictions shall make the decisions required to implement the
20 Countywide Planning Policies into their respective comprehensive
21 plans. (July 1994 ~~1993~~ target date)

22
23 b. All jurisdictions shall make the decisions required to implement the
24 Countywide Planning Policies and their respective comprehensive
25 plans through development regulations. (December 1994 target
26 date)

1 STEP 4:-----a.-----The GMPC shall reconvene in July 1993 or sooner as needed to
2 review issues raised through local plan implementation efforts, and
3 to consider new or revised policies developed through
4 implementation of the GMPC tasks specified in the Countywide
5 Planning Policies.---The GMPC shall recommend revisions as needed
6 to resolve identified conflicts between policies and address
7 implementation issues.---(July 1994 target date)

8
9 c.-b. The GMPC shall establish a process for resolving conflicts between
10 local plans and the Countywide Planning Policies. ~~as raised by local~~
11 ~~jurisdictions, and may recommend amendments to either the~~
12 ~~Countywide Planning Policies or local plans.---(July 1994 target~~
13 ~~date)~~

14
15 d.-e. Phase 2 Amendments to the Countywide Planning Policies shall be
16 subject to ratification by at least thirty percent of the city and
17 county governments representing seventy percent of the population
18 in King County. All jurisdictions shall amend comprehensive plans
19 as needed by July 1995 to be consistent with adopted and ratified
20 Phase 2 amendments.

21
22 STEP 5:-----All jurisdictions shall make the decisions required to implement the
23 Countywide Planning Policies and their respective comprehensive plans
24 through regulations.---(July 1994 target date)

1 STEP 4. Following adoption of comprehensive plans, the GMPC or its successor
2 shall review adopted targets and estimated capacity for each jurisdiction
3 to ensure sufficient capacity within the Urban Growth Area.

4
5 a. Each jurisdiction shall report to the GMPC or its successor the
6 household and employment targets adopted in its comprehensive
7 plan, and the estimated capacity for household and employment
8 growth for the next 20 years. Jurisdictions containing Urban or
9 Manufacturing/Industrial Centers shall report household and
10 employment targets both for Centers and areas outside Centers.
11 Each jurisdiction shall also evaluate the availability of infrastructure,
12 as anticipated in local capital improvement plans, to ensure that
13 capacity is available to accommodate a six-year estimate of
14 household and employment growth.

15
16 b. The GMPC or its successor shall review growth targets and capacity
17 for each jurisdiction to assure that local targets are within the
18 adopted ranges and countywide capacity is sufficient to meet 20
19 year growth targets. If a discrepancy exists between growth targets
20 and capacity, the GMPC or its successor shall recommend changes
21 to local plans to ensure that growth targets can be achieved by
22 planned zoning and infrastructure capacity.

23
24 STEP 5. The GMPC or its successor shall establish a monitoring and benchmarks
25 program to assess progress in meeting Countywide Planning Policies.
26
27
28

1 a. The GMPC or its successor shall establish a growth management
2 monitoring advisory committee which shall recommend information to
3 be reported annually to serve as indicators and benchmarks for
4 growth management policies. The advisory committee shall include
5 both public and private sector participation, representing the wide
6 range of growth management concerns. The annual reporting shall
7 incorporate the economic development policy indicators developed by
8 the Fiscal and Economic Development Task Force and adopted by the
9 GMPC, and shall consider housing indicators specified in policy AH-5.
10 The GMPC or its successor shall adopt a monitoring program and
11 report the adopted growth management benchmarks annually.

12
13 b. The GMPC or its successor should conduct a comprehensive
14 evaluation to assess progress on countywide policies. The evaluation
15 should be initiated as indicated by results the monitoring program, but
16 no earlier than five years after adoption of the Phase 2 Amendments
17 to the Countywide Planning Policies. The evaluation shall include
18 opportunities for public involvement.

19
20 c. The Urban Growth Area shall be reviewed no earlier than 10 years
21 after the adoption and ratification of the Phase 2 Amendments to the
22 Countywide Planning Policies. The Urban Growth Area may be
23 amended, based on criteria including, but not limited to the following:

- 24
25 - criteria in policies LU-14 and LU-16;
26 - amount of vacant land;
27
28

- amount of redevelopable land;
- market demand by category of land use, including rate of absorption and consumption;
- rate of population and employment growth compared to state wide rates;
- number of households and employees per acre compared to jurisdictional adopted goals and targets.

d. Amendments to the Countywide Planning Policies shall be subject to ratification by at least thirty percent of the city and county governments representing seventy percent of the population in King County.

Rationale: The existing policy is revised to reflect the changed schedule of Phase 2 work. Step 3 is expanded to cover implementation of the CPPs through comprehensive plans and development regulations; comprehensive plans must be consistent with Phase 2 CPP amendments by July 1995. Step 4 outlines the steps needed for countywide review of household and employment targets after adoption of comprehensive plans to assure adequate capacity to meet 20 year targets as well as 6-year growth estimates. A new Step 5 calls for development and adoption of a monitoring and benchmarks program. A comprehensive evaluation of the CPPs shall occur no earlier than 5 years after adoption of Phase 2 amendments and review of the urban growth area shall occur within 10 years as called for in the Growth Management Act.

May 4, 1994

Introduced By:

Bob Edwards
Fred Jarrett

Number: 3

Countywide Planning Policies Amendment

Countywide Planning Policies as Adopted July 6, 1992

On page 7, lines 27-28 and page 8, lines 1-2, of the Countywide Planning Policies as Adopted July 6, 1992 and reprinted on legislative paper, **FW-1(d)** shall be amended to read as follows:

- 1 **FW-1(d)** Housing and jobs to accommodate the growth targets ~~King County's~~
- 2 ~~projected population~~ shall be planned in the context of carrying capacity of
- 3 the land. Housing density and affordability shall be considered co-equal
- 4 objectives.

Rationale:

Makes consistent reference with other policy amendments to growth targets.

A-29

A-26

May 10, 1994

INTRODUCED BY: Gary Locke

Countywide Planning Policies Amendments

1 On page 30, line 28, of the Countywide Planning Policies as adopted July 6, 1992 and
2 reprinted on legislative paper, new text is added following the subheading "Urban
3 Centers Criteria" as follows:
4

5
6 **2. Urban Centers Criteria**

7
8 Urban Centers vary substantially in the number of households and jobs they contain
9 today. The intent of the Countywide Planning Policies is to encourage the growth of
10 each Urban Center as a vibrant community that is an attractive place to live and work
11 and will support efficient public services including transit.

12
13 Two approaches are used to set guidelines and track the growth of Urban Centers.
14 First, the policies establish criteria for zoning. These criteria establish minimum levels
15 of households and jobs needed to achieve the benefits of an Urban Center. Some
16 Urban Centers will reach these levels over the next twenty years, while for others the
17 criteria set a path for growth over a longer term and provide capacity to accommodate
18 growth beyond the 20 year horizon.

19
20 Second, jurisdictions establish 20 year household and employment growth targets for
21 each Urban Center. (See Appendix xx.) The targets reflect the diversity of the
22 centers, allowing communities to envision changes over the next 20 years and plan for
23 needed services. The targets set an achievable level of growth for each Center that
24 not only considers land capacity but also the timing and funding of infrastructure. In
25 most cases, the center targets are somewhat higher than the standard growth
26
27
28

1 projections; reaching the targets will require planning, public investment, and
2 incentives for private investment. Over time the Centers will move toward the
3 development pattern envisioned in the countywide policies.

4
5 Within the County, Urban Centers are expected to account for about one-half of
6 employment growth and one-quarter of household growth over the next 20 years.
7 Additional capacity for household and employment growth is provided in the Urban
8 Growth Area outside of designated Urban Centers.

9
10 LU-29 Each jurisdiction which has designated an Urban Center shall adopt in its
11 comprehensive plan a definition of the urban center which specifies the
12 exact geographic boundaries of the center. All centers shall be up to
13 1-1/2 square miles of land. For the purposes of achieving a long-range
14 development pattern that will provide a successful mix of uses and
15 densities that will efficiently support high capacity transit, each ((Each))
16 center shall be zoned to accommodate:

- 17
18 a. A minimum of 15,000 jobs within 1/2 mile of a transit center;
19 b. At a minimum, an average of 50 employees per gross acre; and
20 c. At a minimum, an average 15 households per gross acre.

21
22
23 **Rationale:** Text and amendment make the distinction between Urban Center zoning
24 criteria and the 20 year household and employment targets. Zoning should be based
25 on Centers criteria.
26
27
28

May 4, 1994

Introduced By:

Bob Edwards

Fred Jarrett

Number: 1

Countywide Planning Policies Amendment**Fis/ED Task Force Proposed Economic Development Policies**

On page 5, after line 20, of the Fis/ED Task Force Proposed Economic Development Policies as printed on legislative paper and handed out at the April 6, 1994 GMPC meeting, add a new policy **ED-12a** to read as follows:

ED-12. Jurisdictions shall seek state legislative approval of a state funding strategy to fund environmental clean-up of industrial sites.
Jurisdictions shall work together on a collaborative basis to develop alternative local county and state financing strategies to fund environmental clean-up of industrial sites.

Rationale:

This policy directs that all jurisdictions work together to secure funding for industrial site clean-up. The analysis of the FIS/ED Task Force on manufacturing/industrial center policies, studies done by the City of Seattle and testimony before the King County Council on Economic Development all reveal that clean-up of industrial sites is needed in order for this county to maintain and redevelop its industrial base. This policy supports the work of the Duwamish Coalition and the efforts of the Seattle/King County Economic Development Council to secure such state and local legislation for funding.

A-59
May 4, 1994

Introduced By:

Bob Edwards
Fred Jarrett

Number: 6

Countywide Planning Policies Amendment

**Amendment to King County 2012
Countywide Planning Policies as Adopted July 6, 1992**

On page 71, after line 11 of the Countywide Planning Policies as Adopted July 6, 1992 and reprinted on legislative paper, add a new framework policy FW-33 to read as follows

FW-33. In order to implement the CPPs, key investments need to be identified and implemented. Public Resources shall include countywide, regional, state and federal governmental contributions. Private sector contributions to these regional investments should be minimal. King County and its cities shall develop a Regional Financing Plan including sources for the key investments by July, 1996.

a. The Regional Financing Plan shall give priority to regional infrastructure investments which contribute to meeting requirements for transportation, water, sanitary sewer and storm water in order to facilitate maintaining momentum in implementing the CPPs.

- 1 b. The Regional Financing Plan shall emphasize strategies to
2 achieve environmental clean-up, redevelopment and affordable
3 housing.
- 4 c. The Regional Financing Plan shall consider any
5 recommendations on regional infrastructure investments which may
6 be contained in the Foundations for the Future: Regional Economic
7 Strategy's Action Plan due out in late 1994.

8

9 **Rationale:**

10 This policy directs a Regional Finance Plan to be developed to fund key
11 infrastructure necessary to implement the CPP vision.

A-60

May 4, 1994

Introduced By:

Bob Edwards

Fred Jarrett

Number: 7

Countywide Planning Policies Amendment

**Amendment to King County 2012
Countywide Planning Policies as Adopted July 6, 1992**

On page 71, line 11, of the Countywide Planning Policies as Adopted July 6, 1992
and reprinted on legislative paper, add a new regional finance strategy policy

RFS 1 to read as follows:

**RFS 1. The Regional Financing Plan shall consider any recommendations
on regional infrastructure investments which may be contained in the
regional economic strategy action plan due out in late 1994.**

Rationale:

The purpose of developing a Regional Economic Strategy is primarily to ensure
that policy commitments and investment decisions made throughout the region
are developed and implemented in a manner that is consistent with an overall
economic plan. At this juncture, the first phase of the Regional Economic Study,
looking at a situational analysis and market opportunities, is all that has been
completed. We do not yet know the exact form and content the recommendations
which will follow a t a subsequent stage will take. However, it would be helpful to

1 have in the CPPs a reminder to policymakers at the County and local level to
2 seriously consider the recommendations contained in this report as they proceed
3 to implement GMA requirements. Acting in this manner is consistent with the
4 emphasis on economic development contained in the GMA. RCW 36.78.210 (3)
5 (h).

May 4, 1994

Introduced By: Bob Edwards
Fred Jarrett

Number: 8

Countywide Planning Policies Amendment

**Amendment to King County 2012
Countywide Planning Policies as Adopted July 6, 1992**

On page 71, line 11, of the Countywide Planning Policies as Adopted July 6, 1992
and reprinted on legislative paper, add a new regional finance strategy policy
RFS-2 to read as follows:

RFS-2. State and local revenues which are earmarked for allocation shall
be used to subsidize infrastructure in selected redevelopment areas where
such subsidies are needed to achieve concurrency.

Rationale:

This policy would provide a possible regional funding source for redevelopment..

A-62

May 4, 1994

Introduced By:

Bob Edwards
Fred Jarrett

Number: 9

Countywide Planning Policies Amendment

**Amendment to King County 2012
Countywide Planning Policies as Adopted July 6, 1992**

On page 71, line 11, of the Countywide Planning Policies as Adopted July 6, 1992
and reprinted on legislative paper, add a new regional finance strategy policy
RFS-3 to read as follows:

**RFS-3. King County and its cities shall seek authority from the State
Legislature to facilitate public sector assemblage of land for the purpose of
redevelopment.**

Rationale:

This policy directs local jurisdictions to request authority from the state legislature
to aggregate and reconvey property. This would support both residential
redevelopment and industrial land use.

A.63

May 4, 1994

Introduced By:

Bob Edwards
Fred Jarrett

Number: 10

Countywide Planning Policies Amendment

**Amendment to King County 2012
Countywide Planning Policies as Adopted July 6, 1992**

On page 71, line 11, of the Countywide Planning Policies as Adopted July 6, 1992
and reprinted on legislative paper, add a new regional finance strategy policy
RFS-4 to read as follows:

RFS-4. King County and its cities shall seek authority from the legislature
to establish special "Urban Center District" where increments of new
revenues resulting from redevelopment can be allocated for infrastructure
financing.

Rationale:

This policy is to gain local authority to use tax increment financing to fund
infrastructure in urban centers.

A-74

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May 14, 1994

Introduced By: Gary Locke
Number: _____

Countywide Planning Policies Amendment
Amendment of King County 2012
Countywide Planning Policies as Adopted July 6, 1992

The Urban Growth Area line as adopted in the Countywide Planning Policies July 6, 1992 is amended to reflect the changes documented in the following maps numbered 1-23 proposed for consent. The following maps should be voted on individually:

- #3: For background information see King County Urban Growth Area: Edge Cities report, Redmond section, Area 1.
- #8: For background information see King County Urban Growth Area: Edge Cities report, Issaquah section, Area 1.
- #9: For background information see King County Urban Growth Area: Edge Cities report, Issaquah section, Area 2.
- #12: For background information see King County Urban Growth Area: Edge Cities report, Renton section, Areas 3 and 4.
- #21: For background information see Rural Cities Urban Growth Areas report North Bend section page 25.
- #22: For background information see Rural Cities Urban Growth Areas report Snoqualmie section page 29.

**Background Information for:
Amendment to the Countywide Planning Policies**

Areas where the city and county are in agreement are indicated by "City/County Proposed Urban Growth Area Line" in the legend. Areas where there is not agreement, such as areas of Redmond, Issaquah and Renton, are indicated by "City Proposed Potential Annexation Area" and "County Proposed Urban Growth Area" in the legend. The recommendation for the City of Black Diamond Urban Growth Area is not in this package because the city and county continue to negotiate a recommendation. From the Interim Urban Growth Area to the 1994 proposed Urban Growth Area, there were 5.57 square miles that were changed from rural to urban. For each rural city, the change in square miles is as follows:

Carnation:	.04	rural to urban
Duvall:	.29	rural to urban
Enumclaw:	.12	rural to urban
North Bend:	.69	urban to rural, .31 rural to urban
Snoqualmie:	3.05	rural to urban
Skykomish:	0	

Please note that the 1992 Countywide Planning Policies Urban Growth Area differs slightly from the interim Urban Growth Area adopted in 1993. The attached maps show the 1993 interim Urban Growth Area and the proposed 1994 Urban Growth Area. The areas of difference between the 1992 and the 1993 Urban Growth Areas are:

East of Black Diamond: The City of Black Diamond had no designated Urban Growth Area in the 1992 Countywide Planning Policies. The County Council added an area east of the city as it's interim Urban Growth Area.

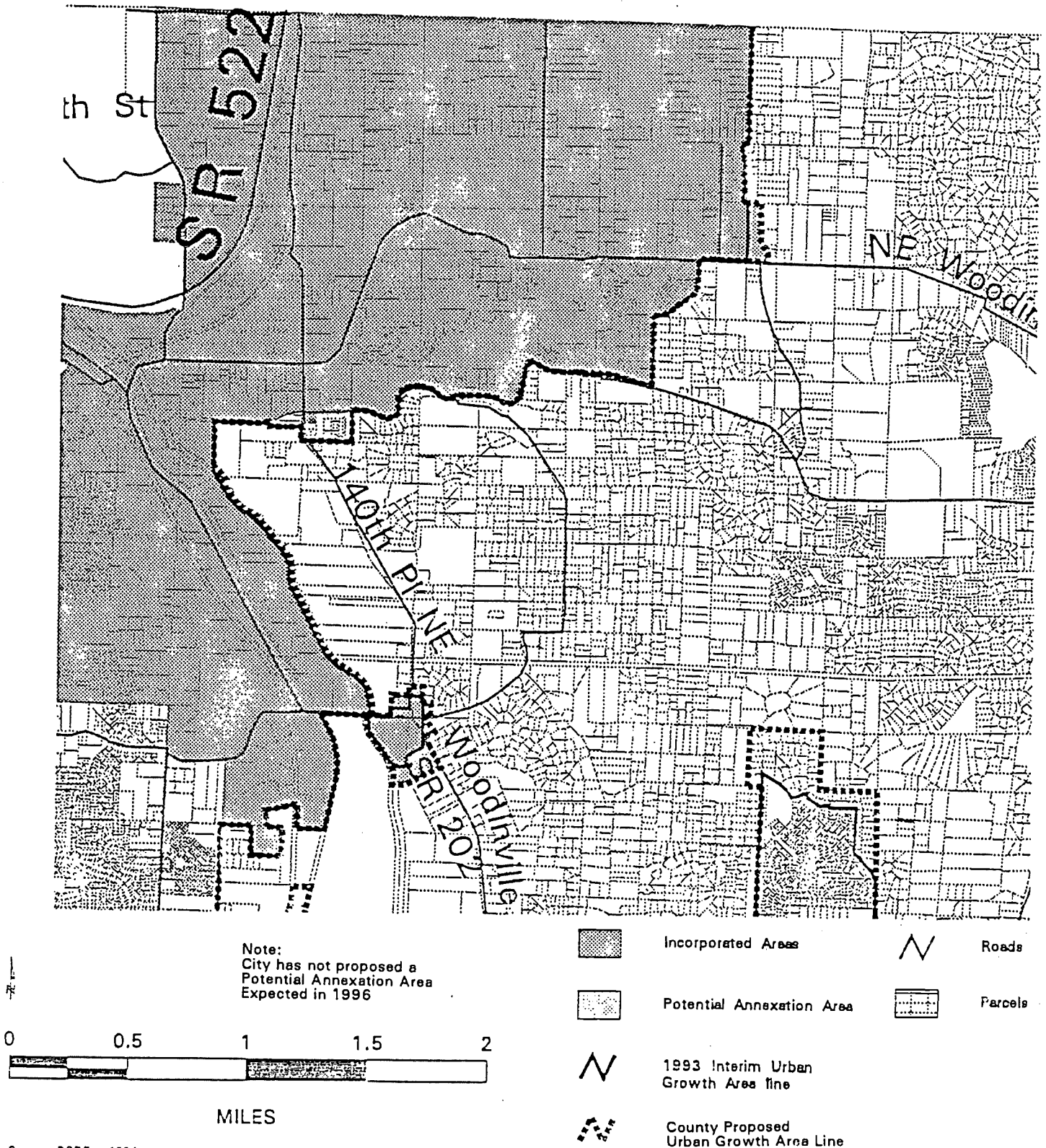
East of Issaquah: Two properties were added to the Urban Growth Area last fall through the adoption/ratification process and included in the interim Urban Growth Area.

The East Sammamish Plateau: The GMPC recognized the planning underway on the East Sammamish Community Plan at the time the Countywide Planning Policies were adopted. The interim Urban Growth Area reflects the land use designations of the Community Plan.

The maps attached to Ordinance 11110 designating the interim Urban Growth area (included in your blue Urban Growth Area package) show these differences.

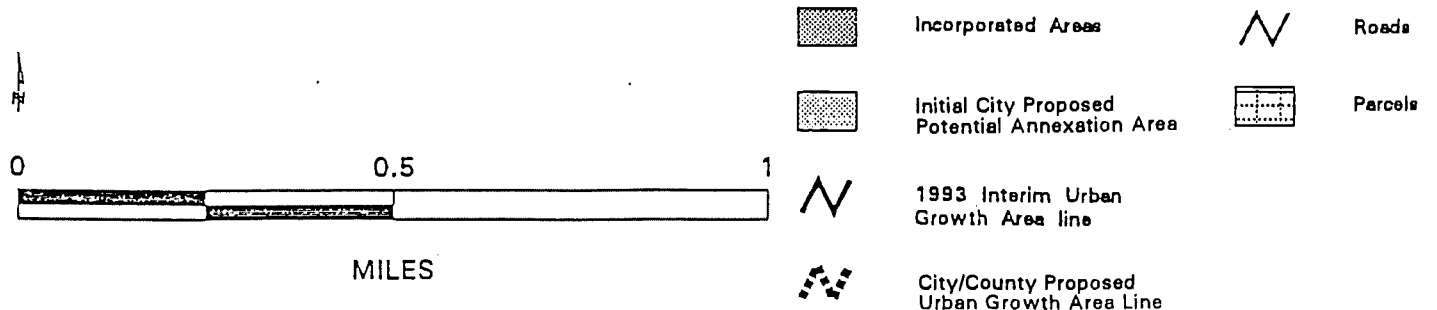
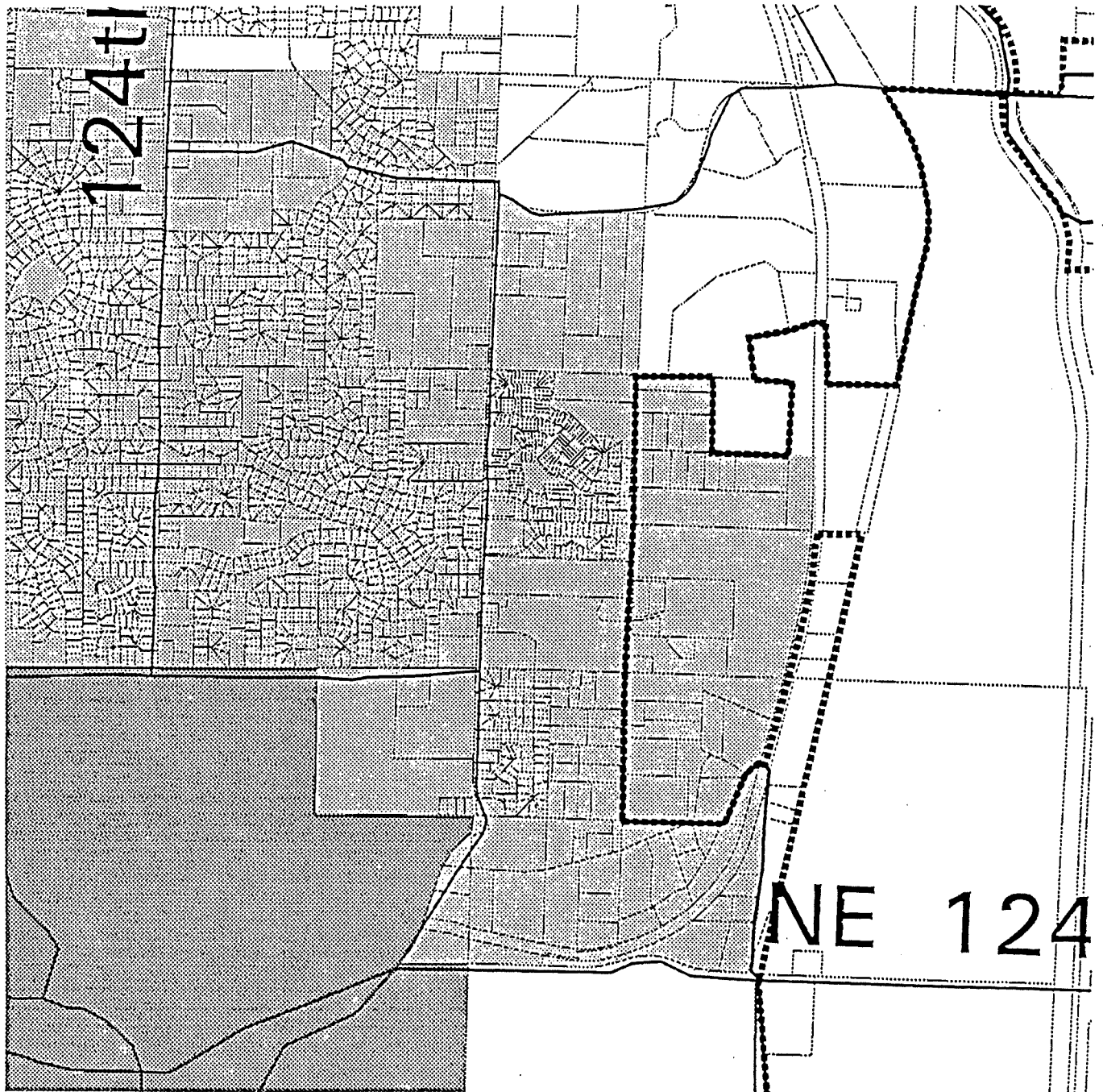
Woodinville Urban Growth Area

1



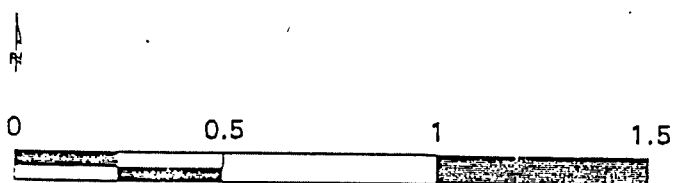
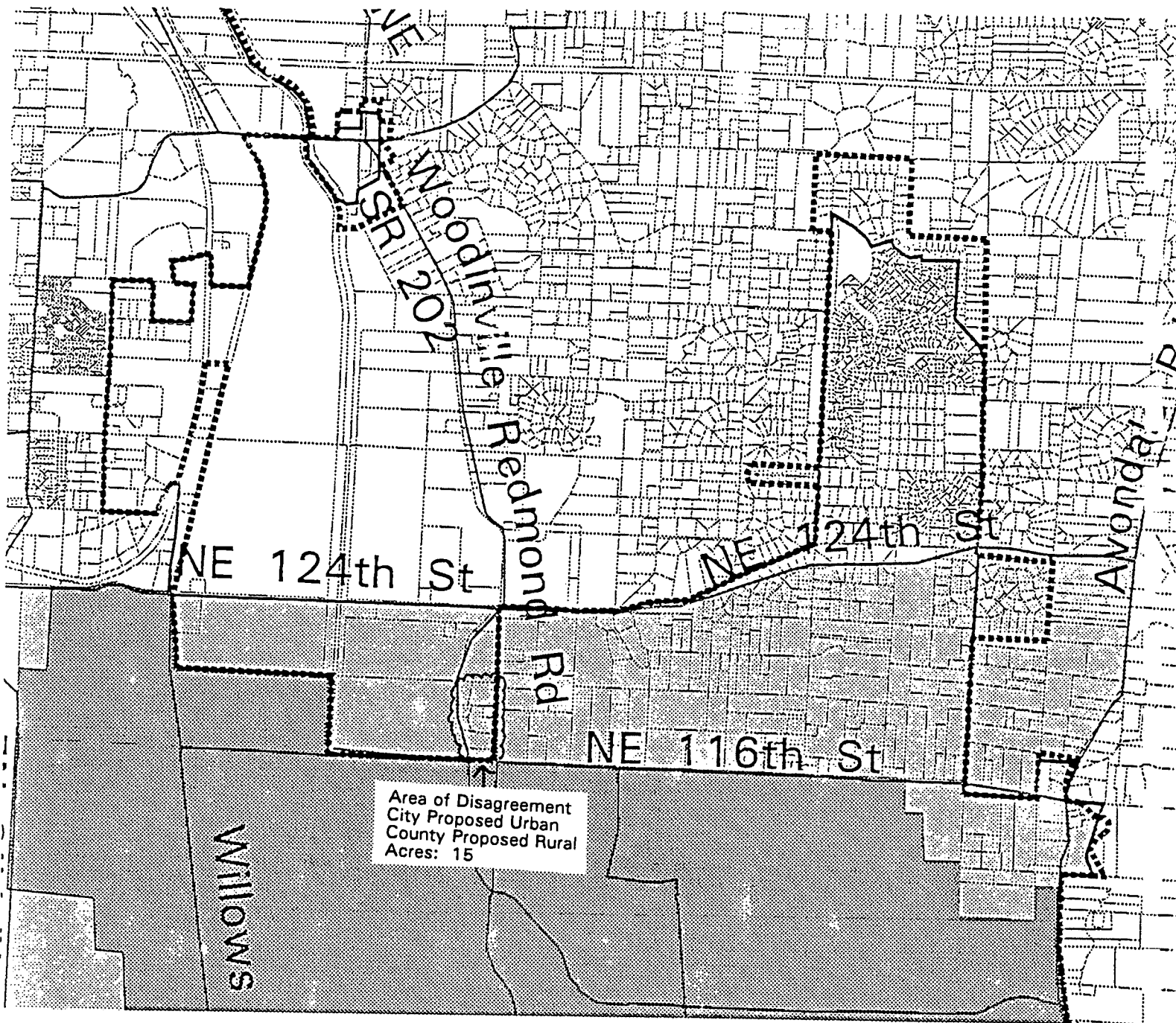
Kirkland - Northeast Urban Growth Area







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Redmond - North Urban Growth Area

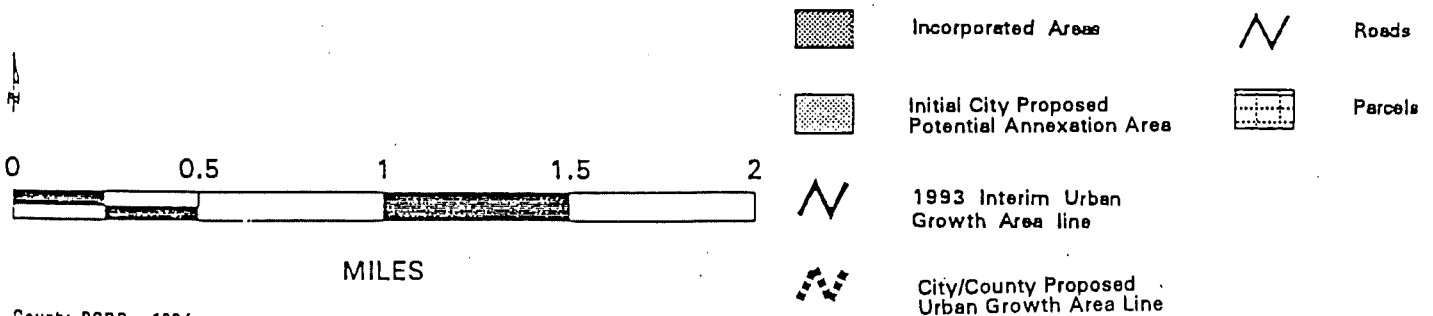
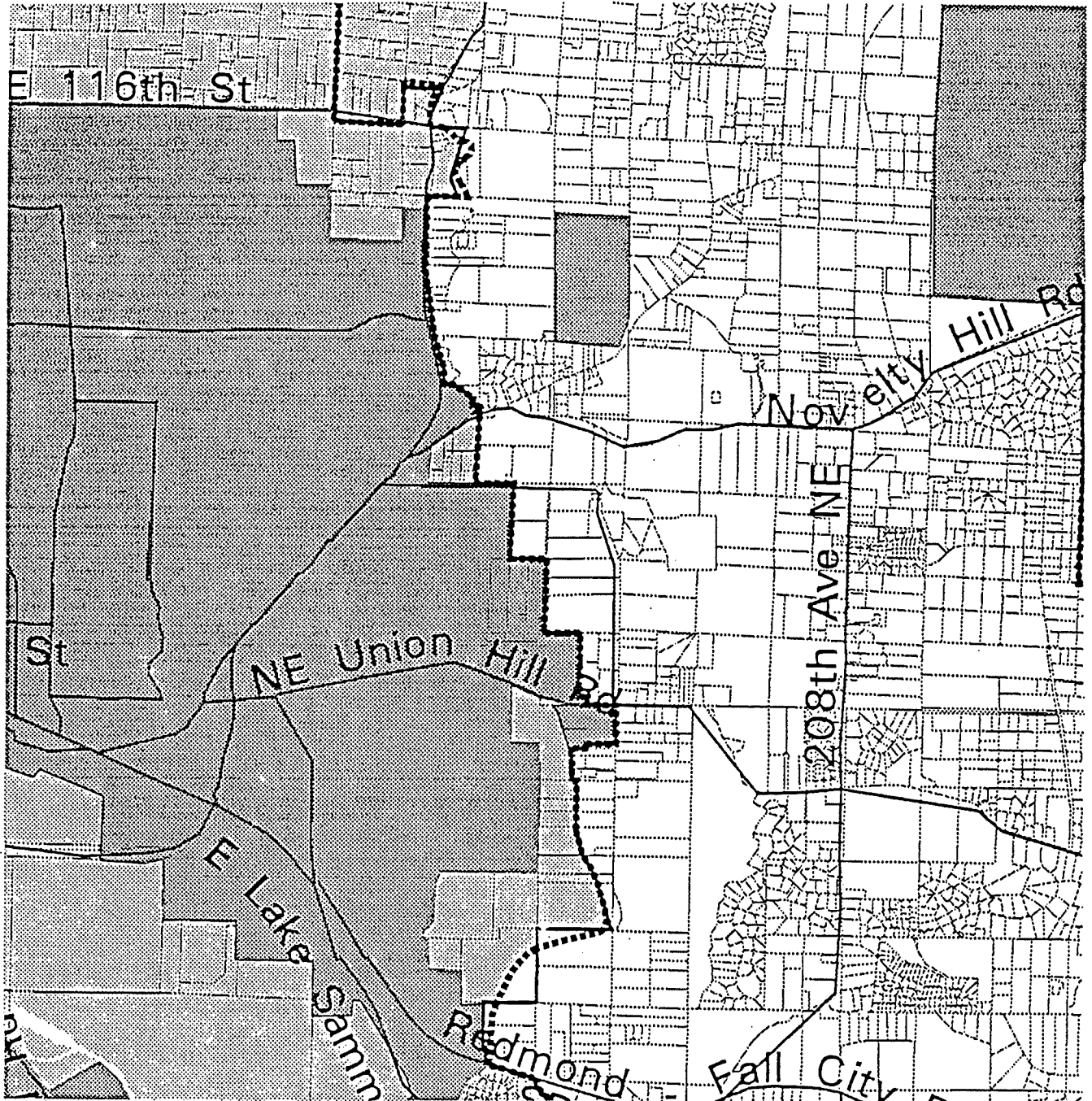
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-  Incorporated Areas
-  Initial City Proposed Potential Annexation Area
-  1993 Interim Urban Growth Area line
-  County Proposed Urban Growth Area Line
-  Roads
-  Parcels

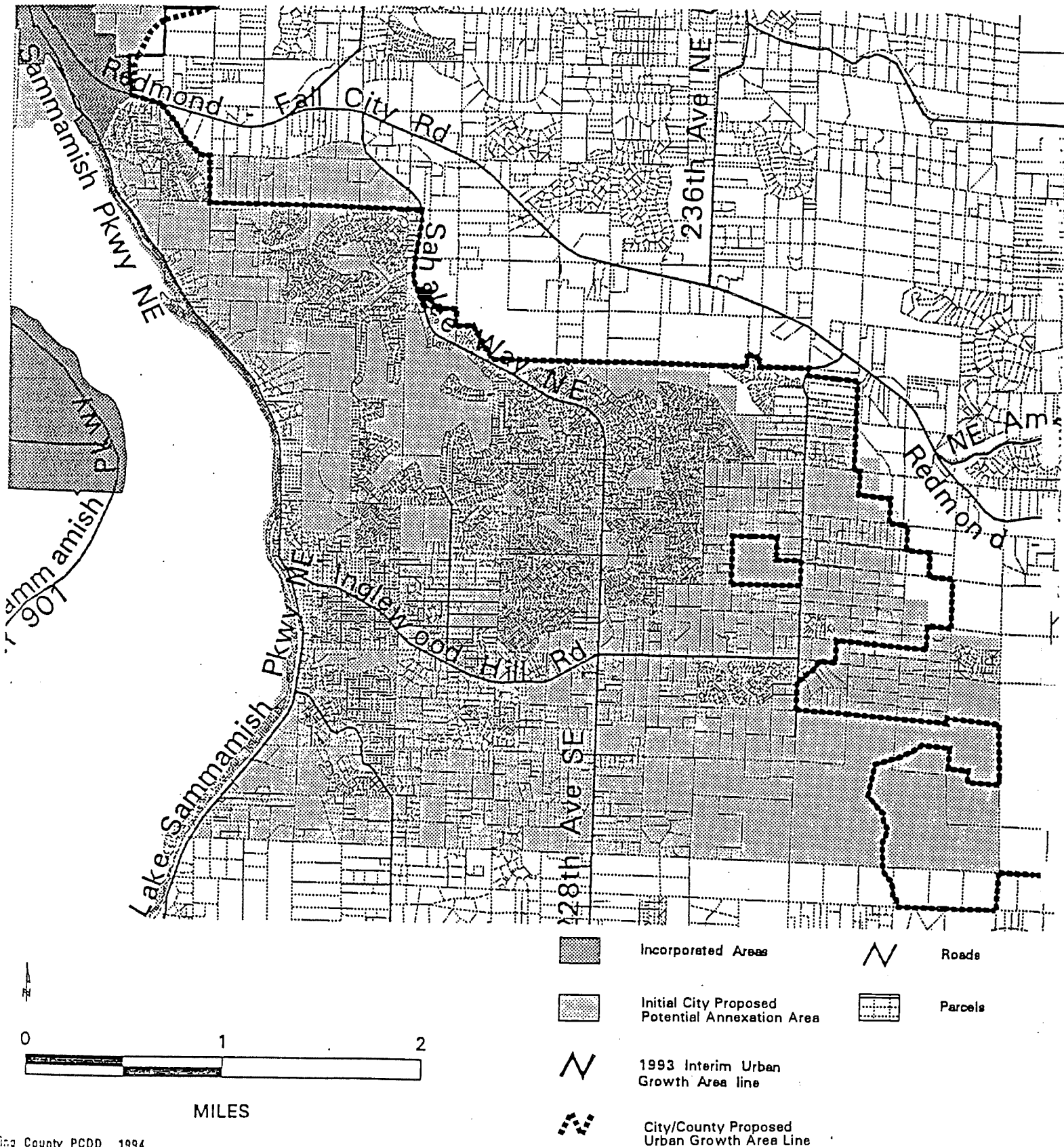
Redmond - East Urban Growth Area

4



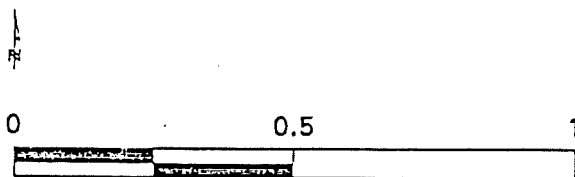
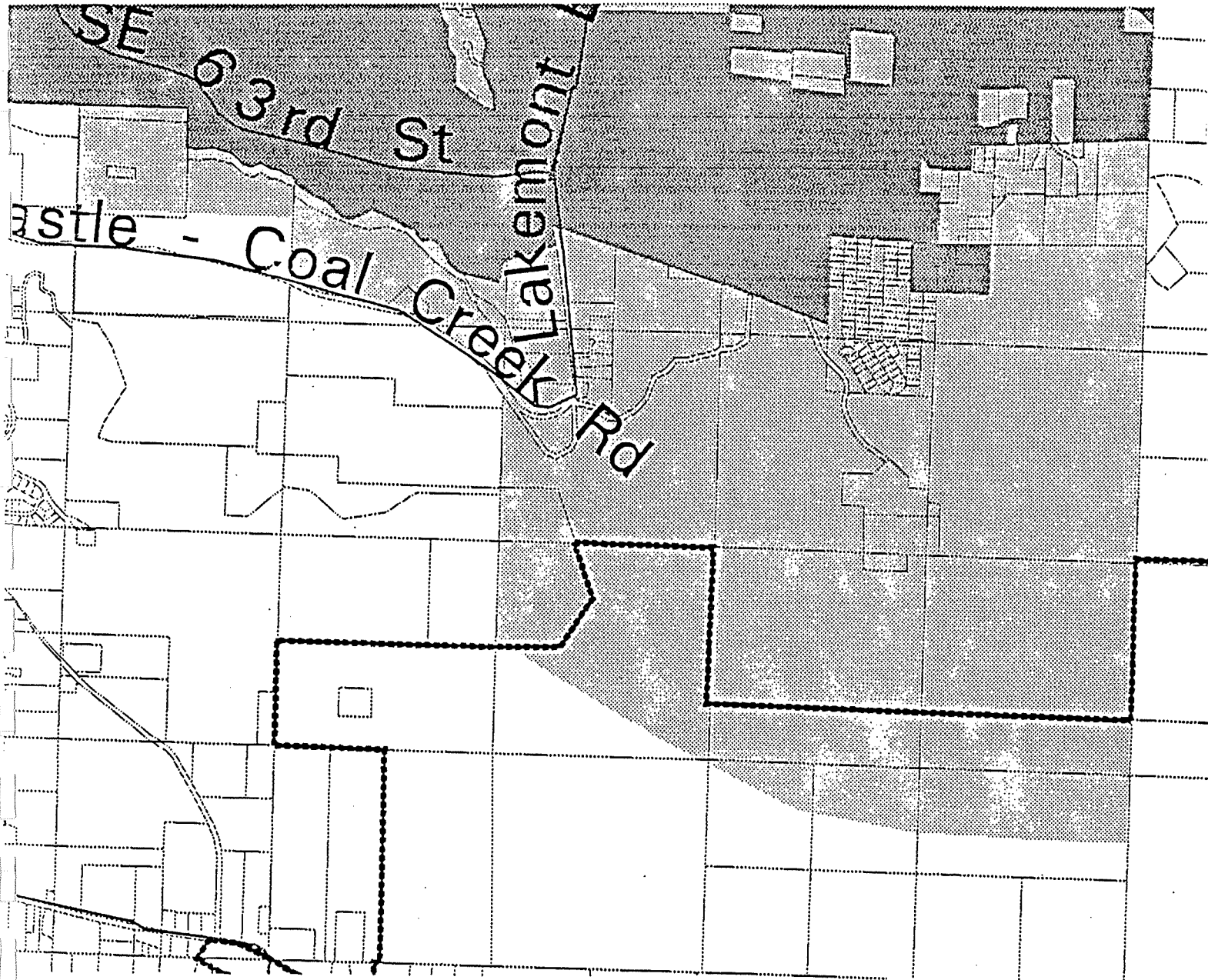
Redmond - Southeast Urban Growth Area

5



Bellevue - Southeast Urban Growth Area

6



MILES



Incorporated Areas



Initial City Proposed
Potential Annexation Area



1993 Interim Urban
Growth Area line



City/County Proposed
Urban Growth Area Line



Roads



Parcels

Newport Hills - East Urban Growth Area

7



Note:
City has not proposed a
Potential Annexation Area
Expected in 1996



Incorporated Areas



Roads



Potential Annexation Area



Parcels



1993 Interim Urban
Growth Area line



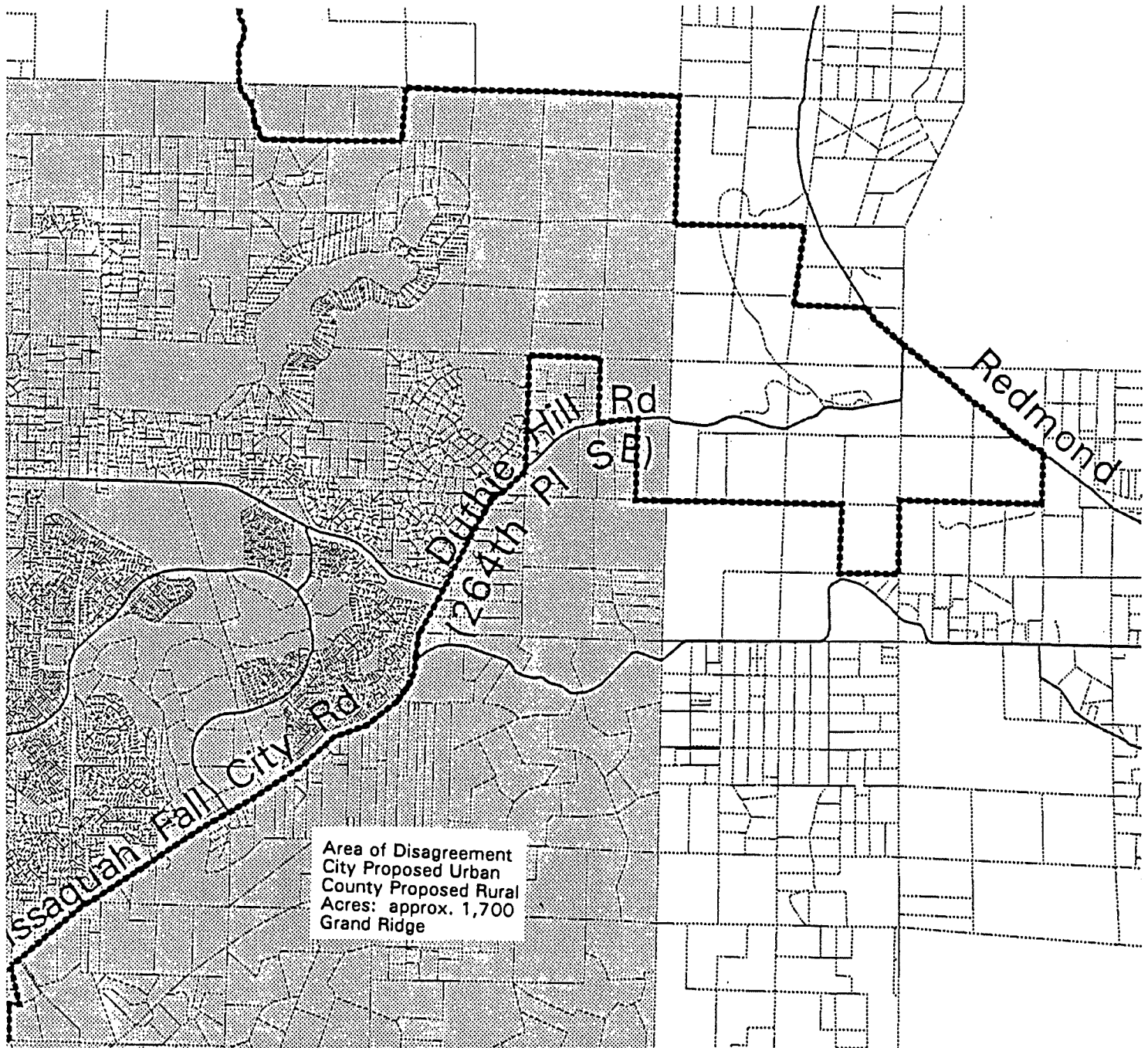
County Proposed
Urban Growth Area Line



MILES

Issaquah - Northeast Urban Growth Area

8



Incorporated Area



Roads



City Proposed
Potential Annexation Area



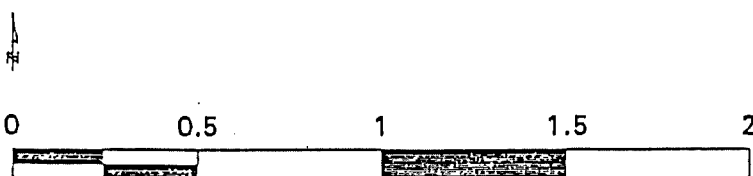
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1993 Interim Urban
Growth Area line

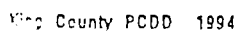


County Proposed
Urban Growth Area Line



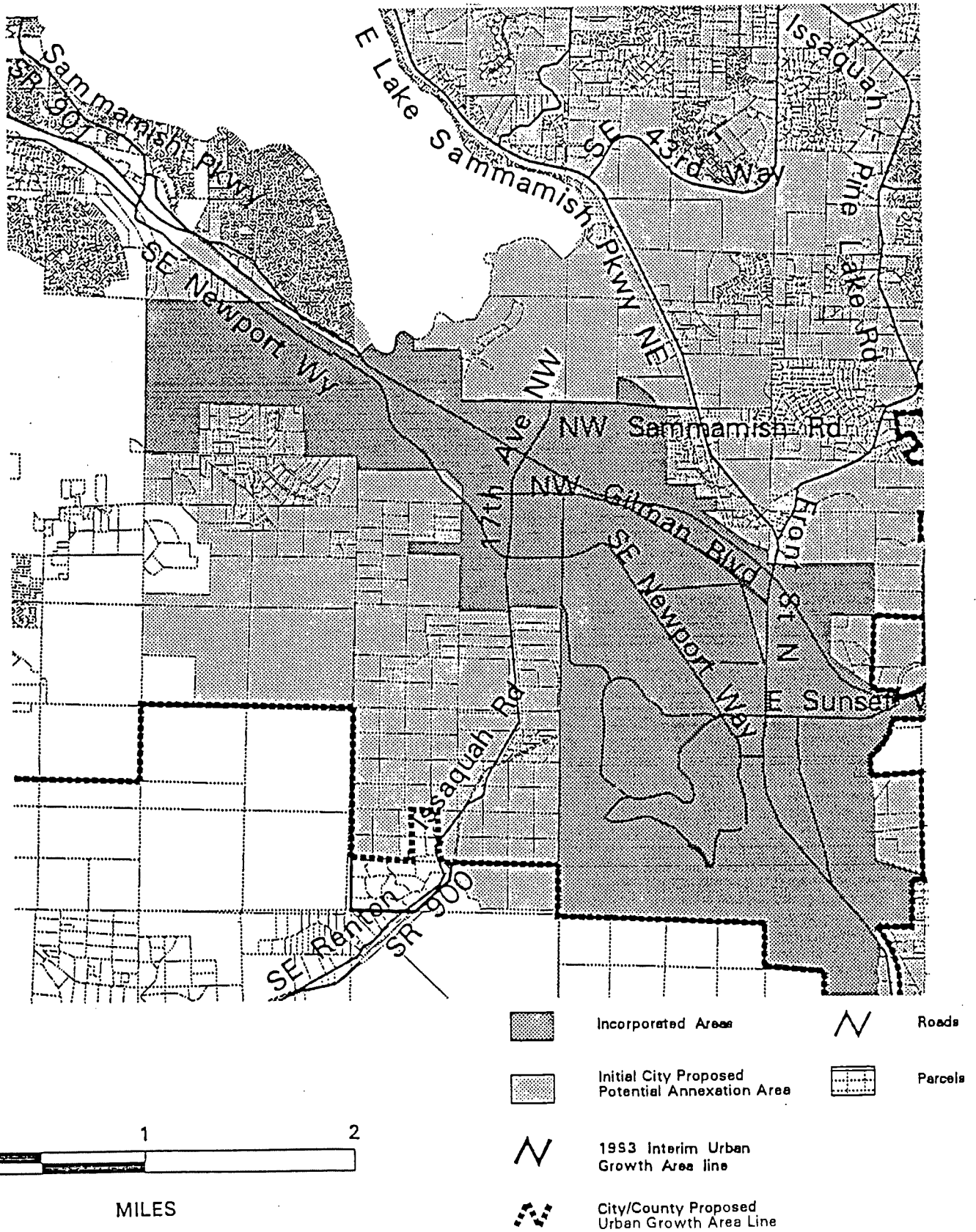
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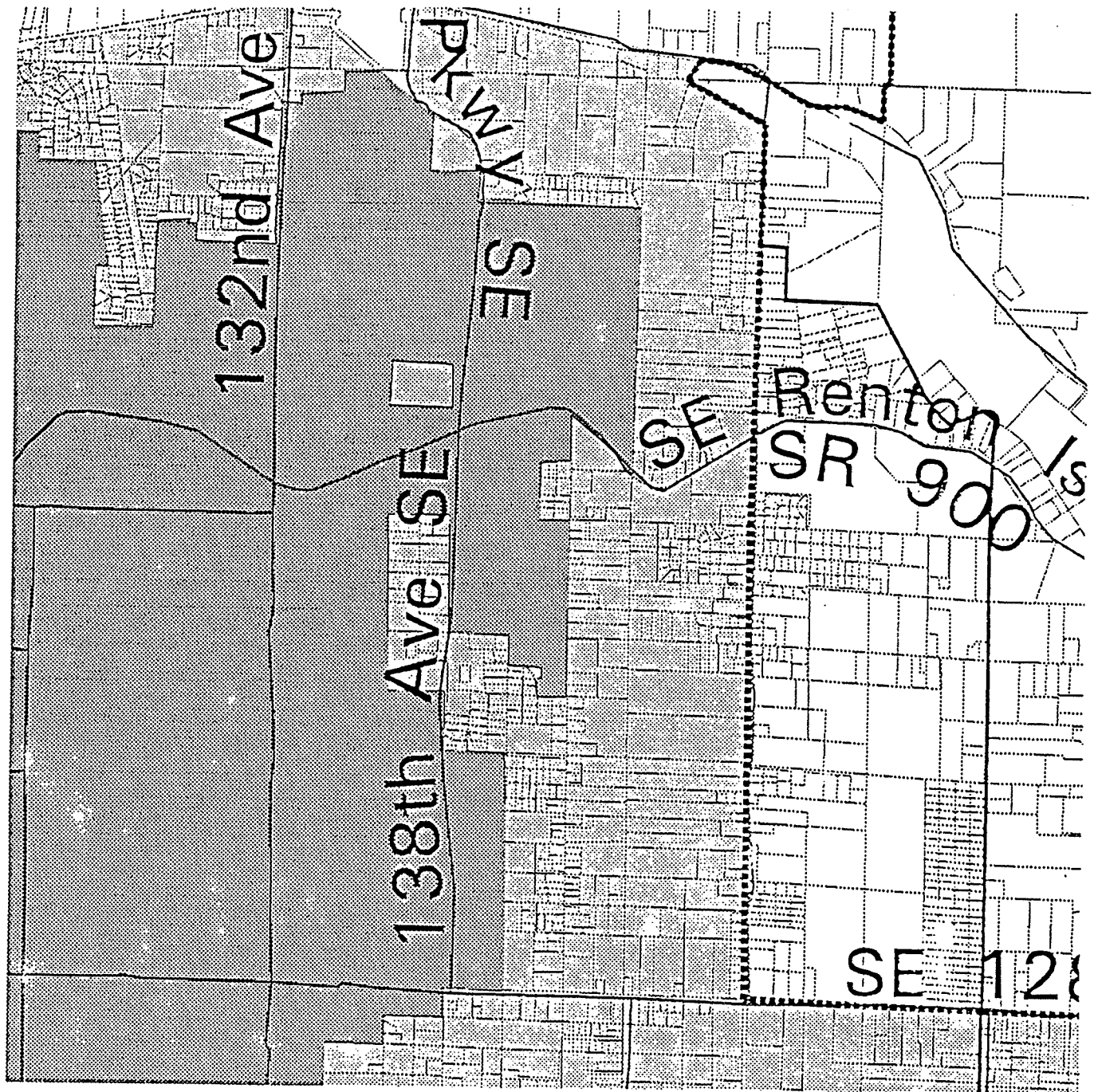
Issaquah - West Urban Growth Area







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Renton - Northeast Urban Growth Area

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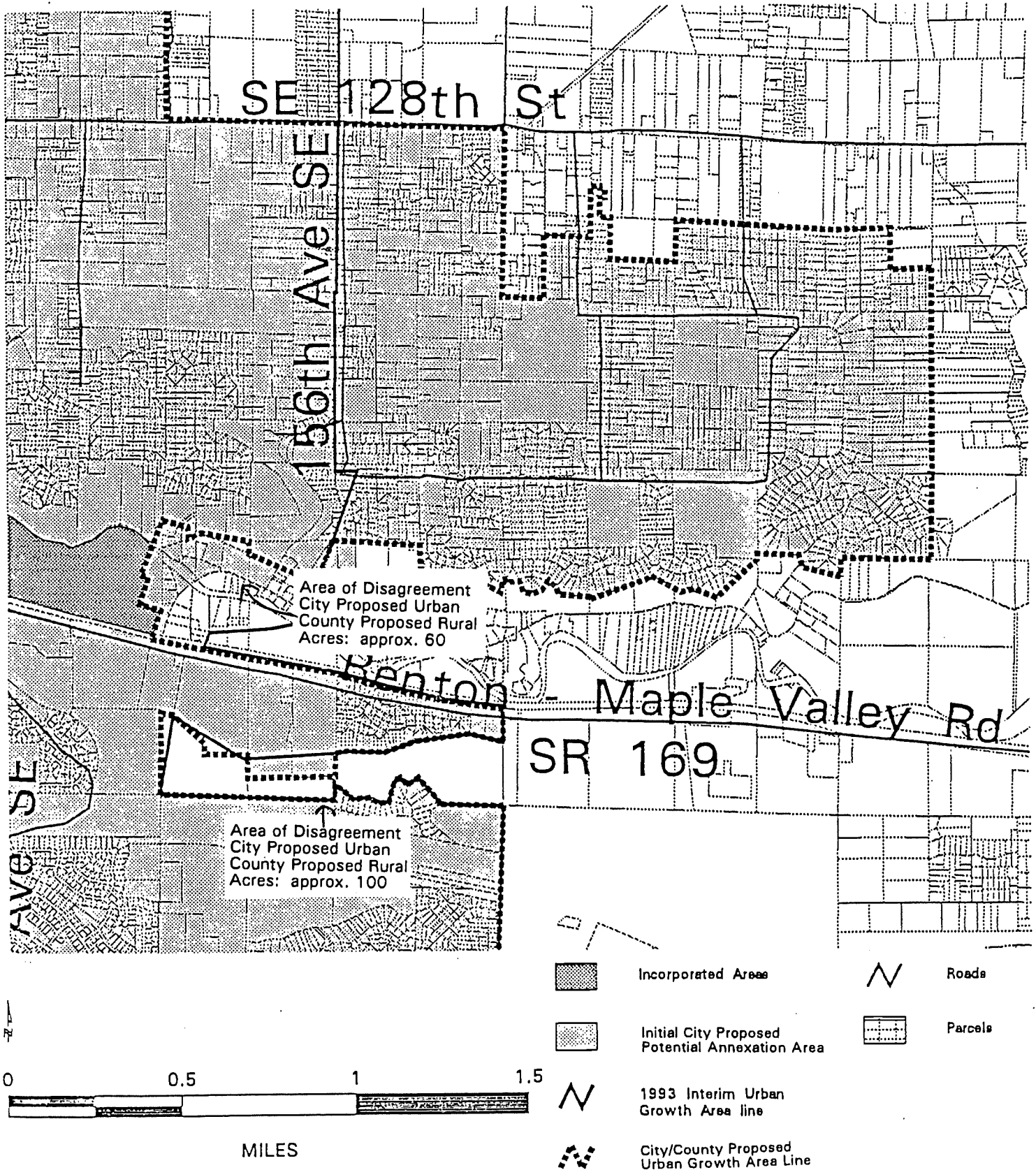


-  Incorporated Areas
-  City Proposed Potential Annexation Area
-  1993 Interim Urban Growth Area line
-  City/County Proposed Urban Growth Area Line
-  Roads
-  Parcels

MILES

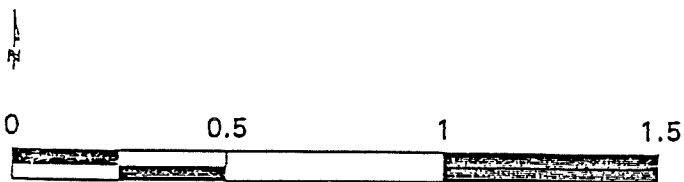
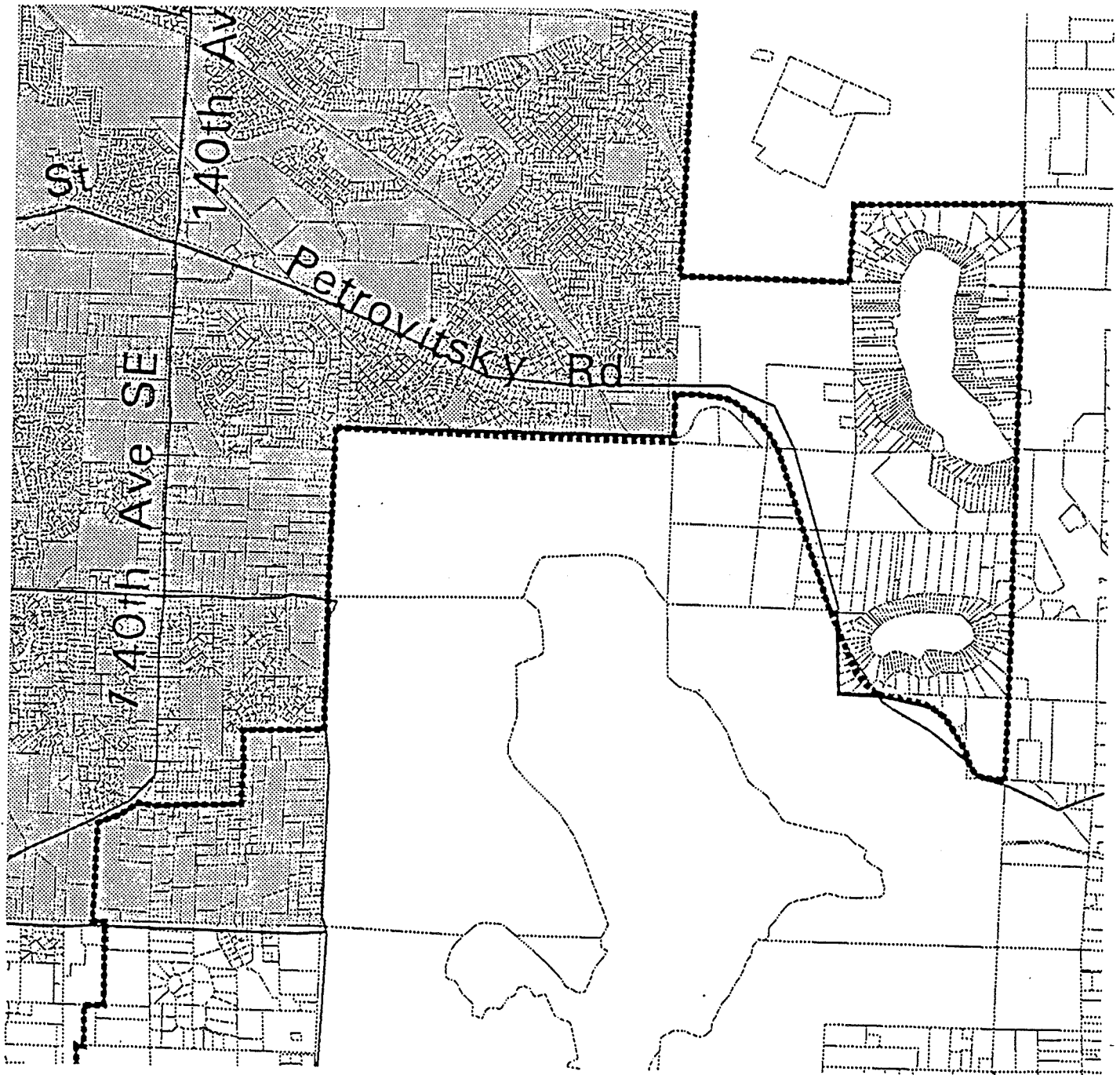
Renton - East Urban Growth Area







12



Renton - Southeast Urban Growth Area

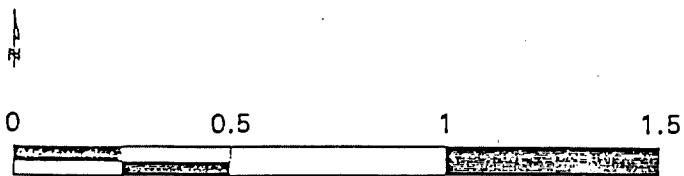
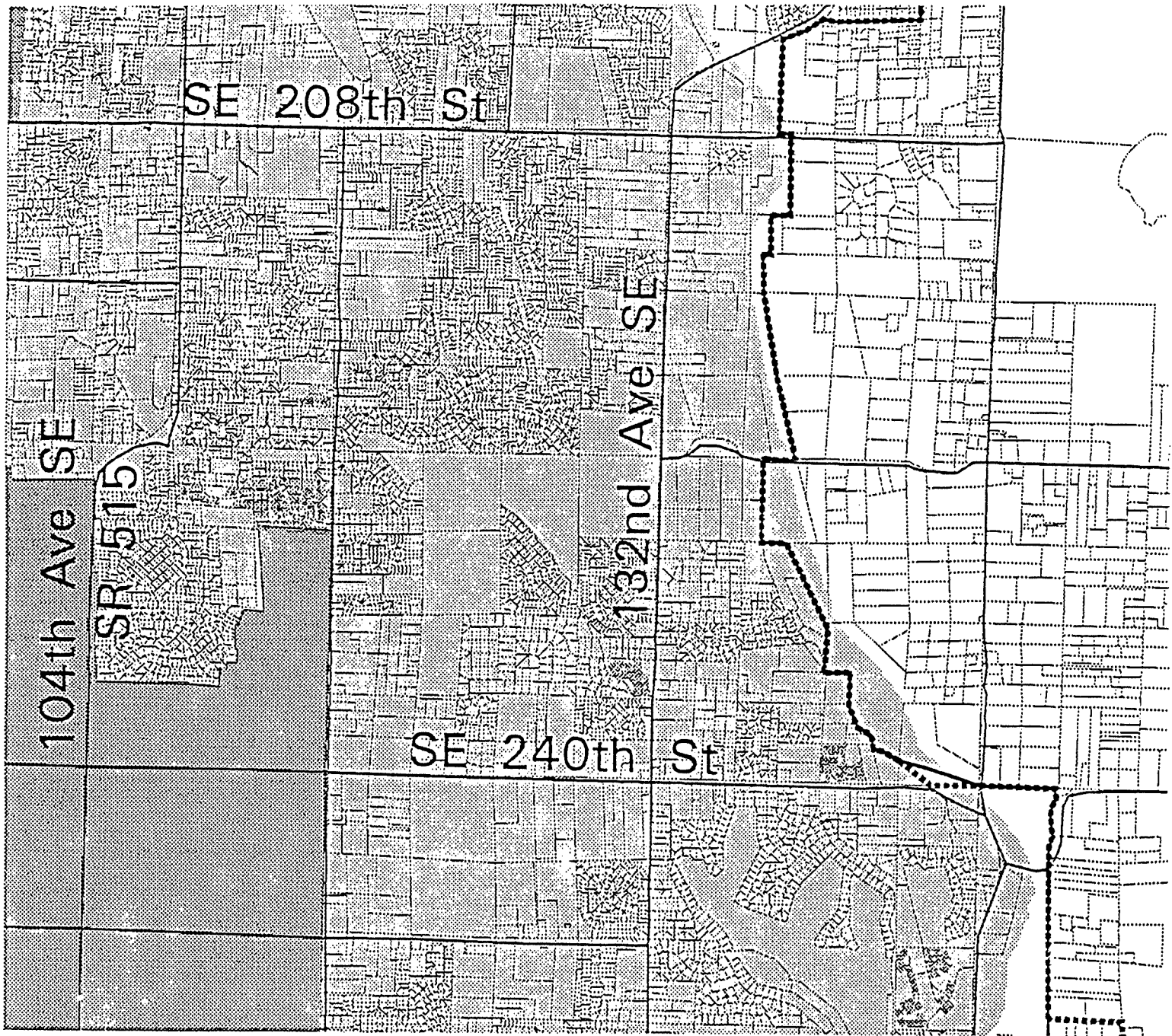
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
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|---|---|---|---------|
|  | Incorporated Areas |  | Roads |
|  | Initial City Proposed Potential Annexation Area |  | Parcels |
|  | 1993 Interim Urban Growth Area line | | |
|  | City/County Proposed Urban Growth Area Line | | |

Kent - East Urban Growth Area

14

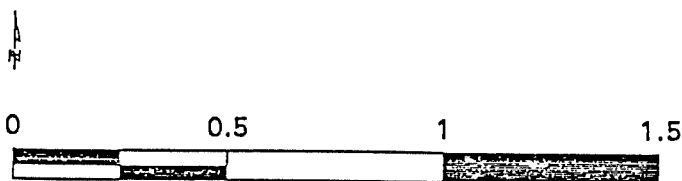
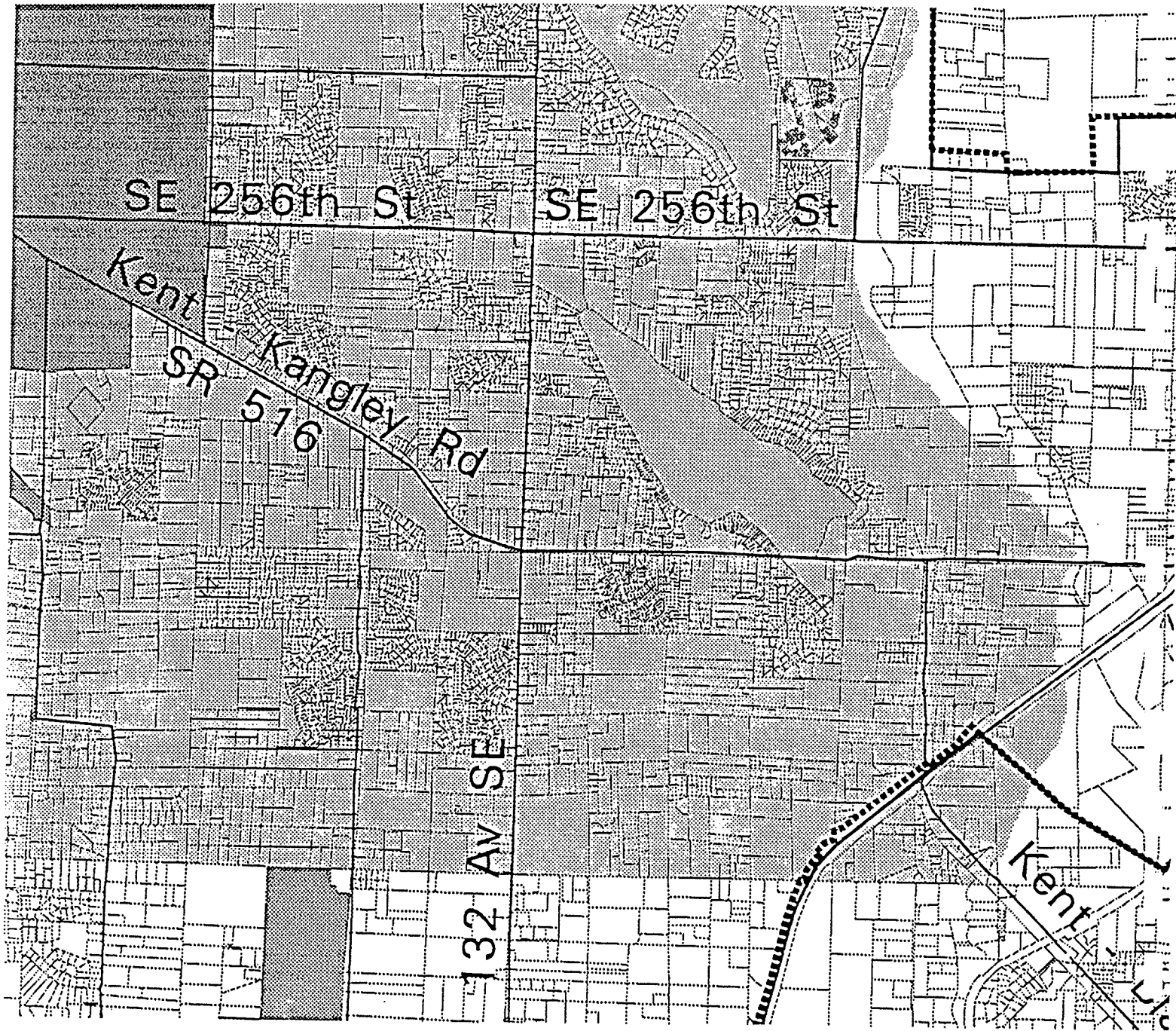


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





-  Incorporated Areas
-  Initial City Proposed Potential Annexation Area
-  1993 Interim Urban Growth Area line
-  City/County Proposed Urban Growth Area Line
-  Roads
-  Parcels

Kent - Southeast Urban Growth Area

15

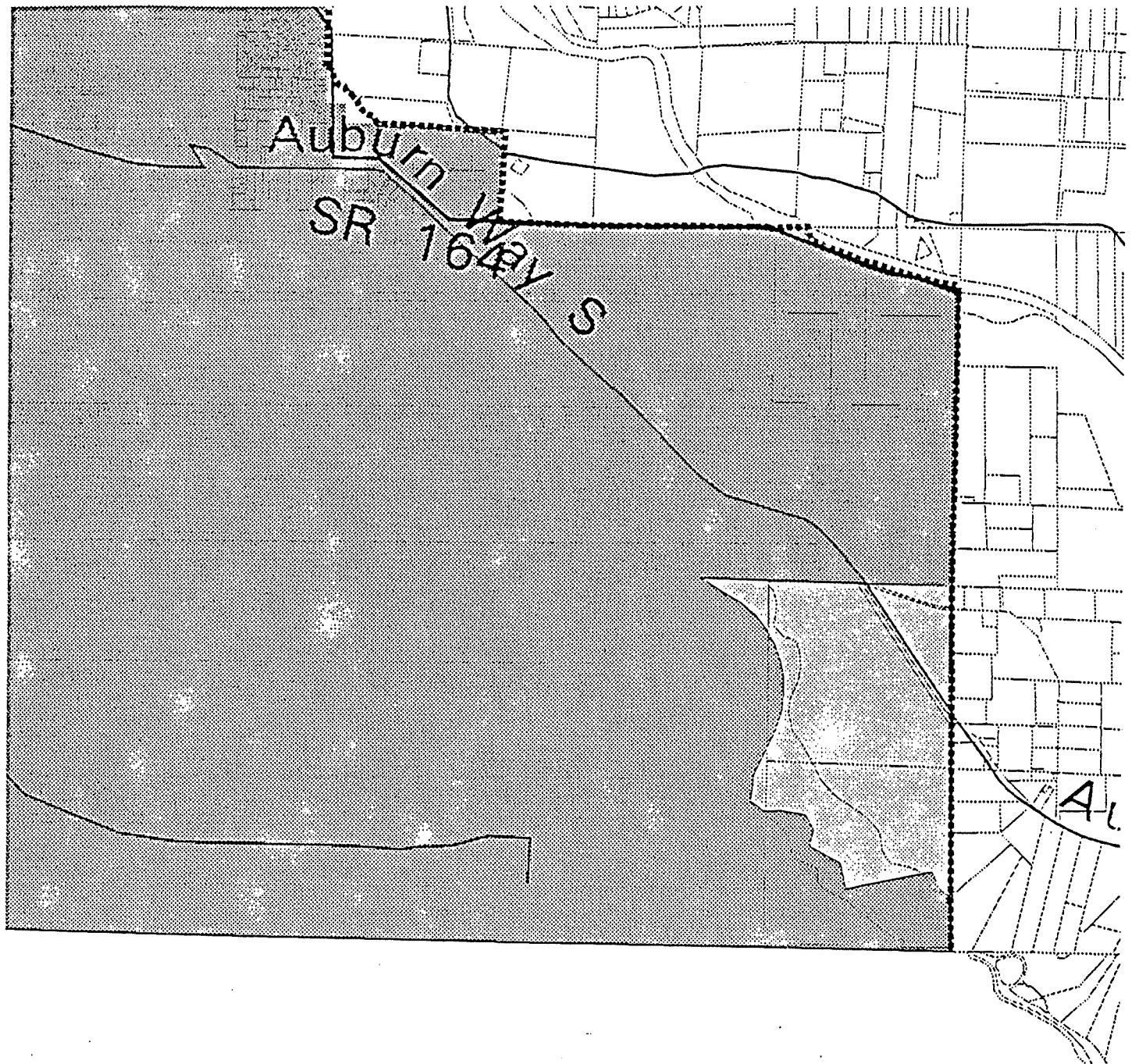


MILES

-  Incorporated Area
-  Initial City Proposed Potential Annexation Area
-  1993 Interim Urban Growth Area line
-  City/County Proposed Urban Growth Area Line
-  Roads
-  Parcels

Auburn - Southeast Urban Growth Area

16



0.5

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MILES



Incorporated Areas



Initial City Proposed
Potential Annexation Area



1993 Interim Urban
Growth Area line



City/County Proposed
Urban Growth Area Line



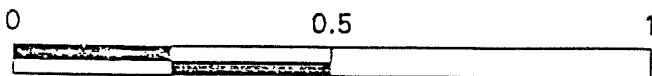
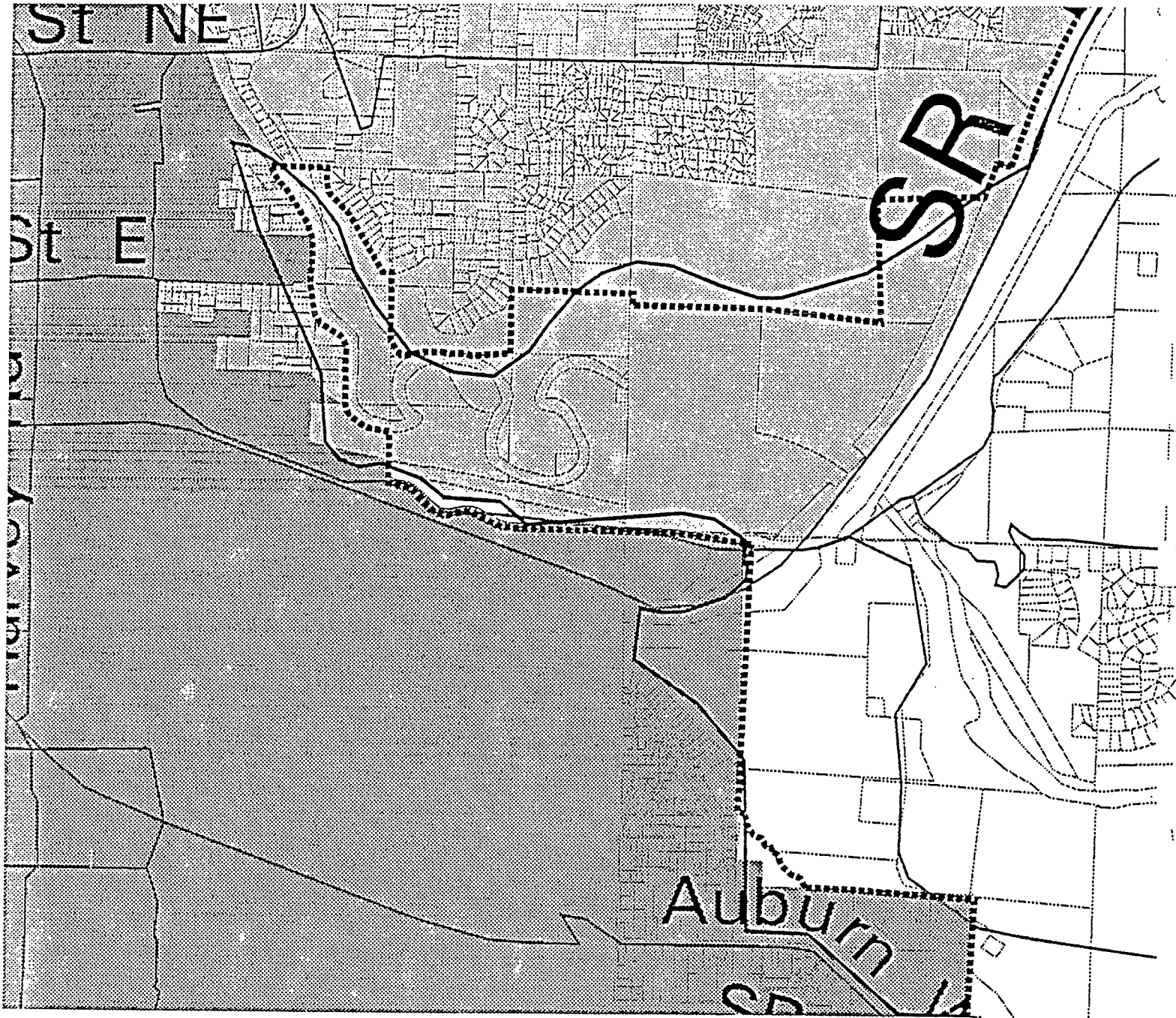
Roads



Parcels

Auburn - East Urban Growth Area

17



MILES



Incorporated Area



Initial City Proposed
Potential Annexation Area



1993 Interim Urban
Growth Area line



City/County Proposed
Urban Growth Area Line



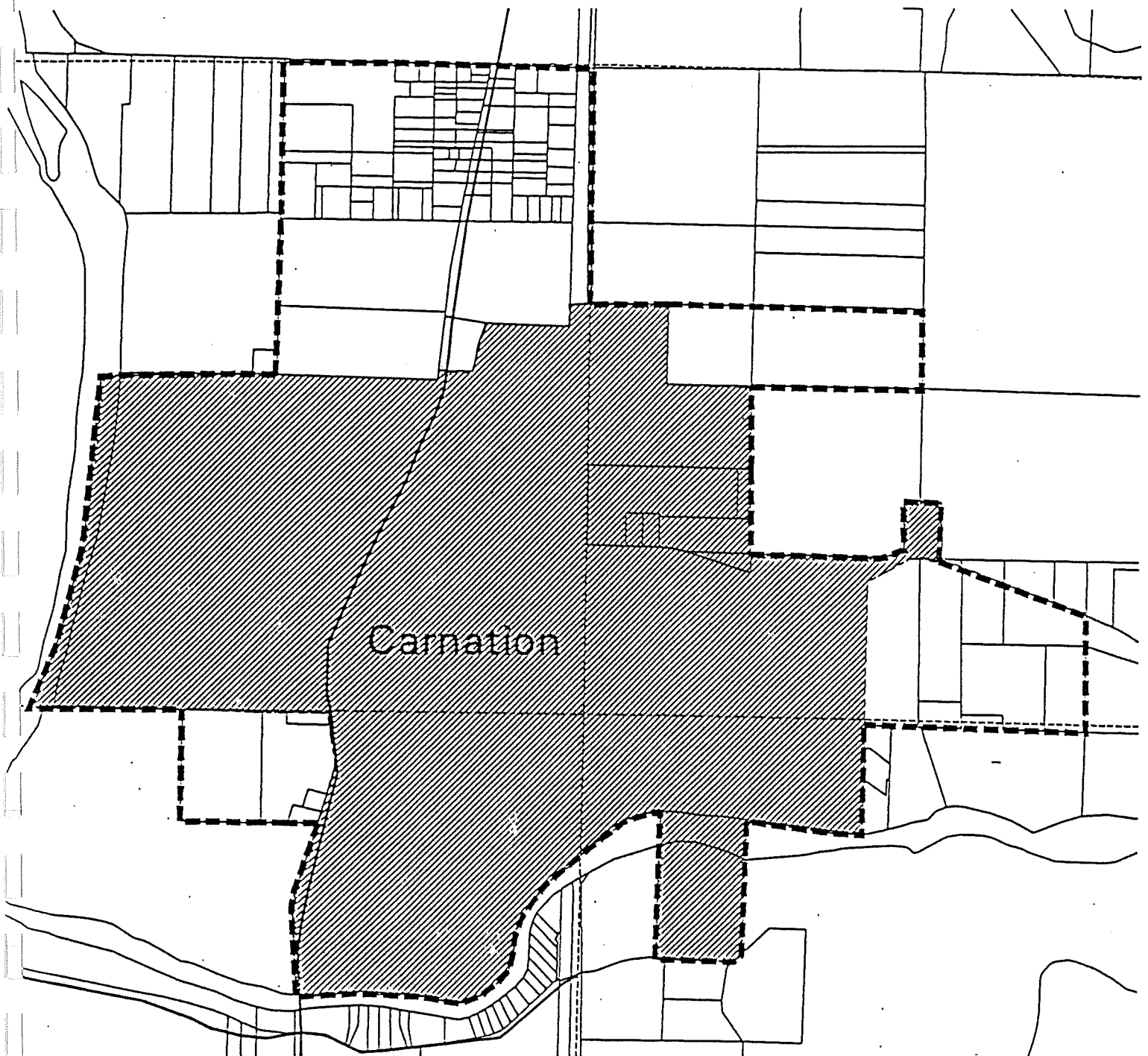
Roads



Parcels

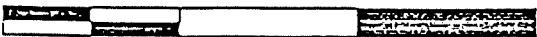
Urban Growth Area City of Carnation

18



City - County
Recommended UGA

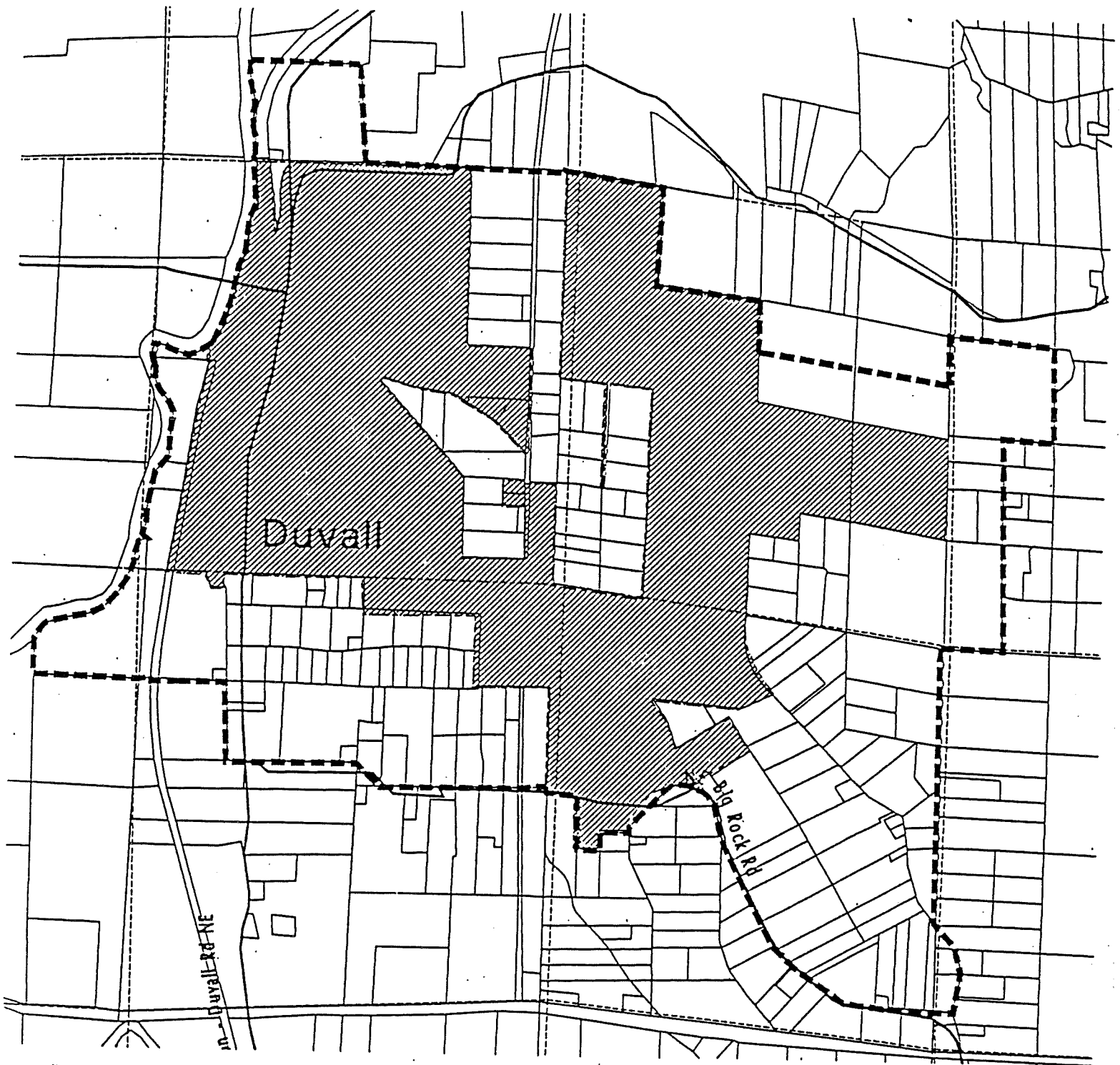
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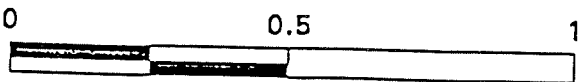
MILES

Urban Growth Area City of Duvall

19



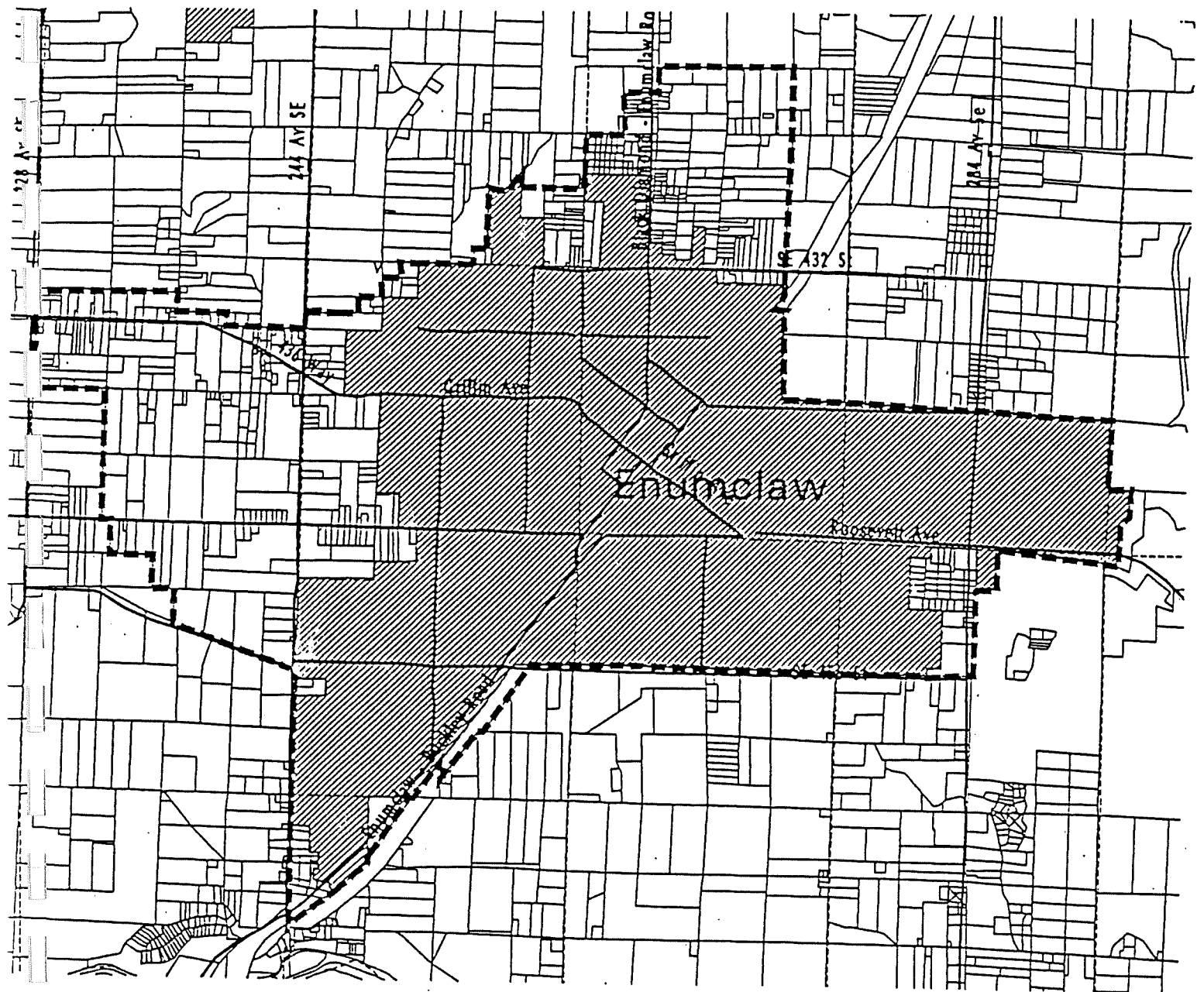
City - County
Recommended UGA



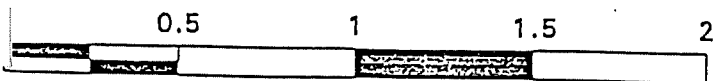
MILES

Urban Growth Area City of Enumclaw

- 20 -



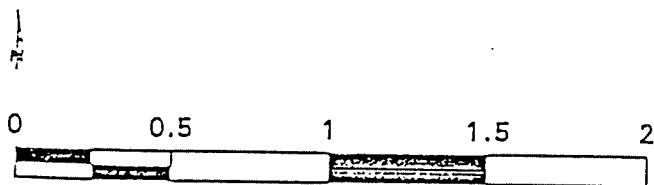
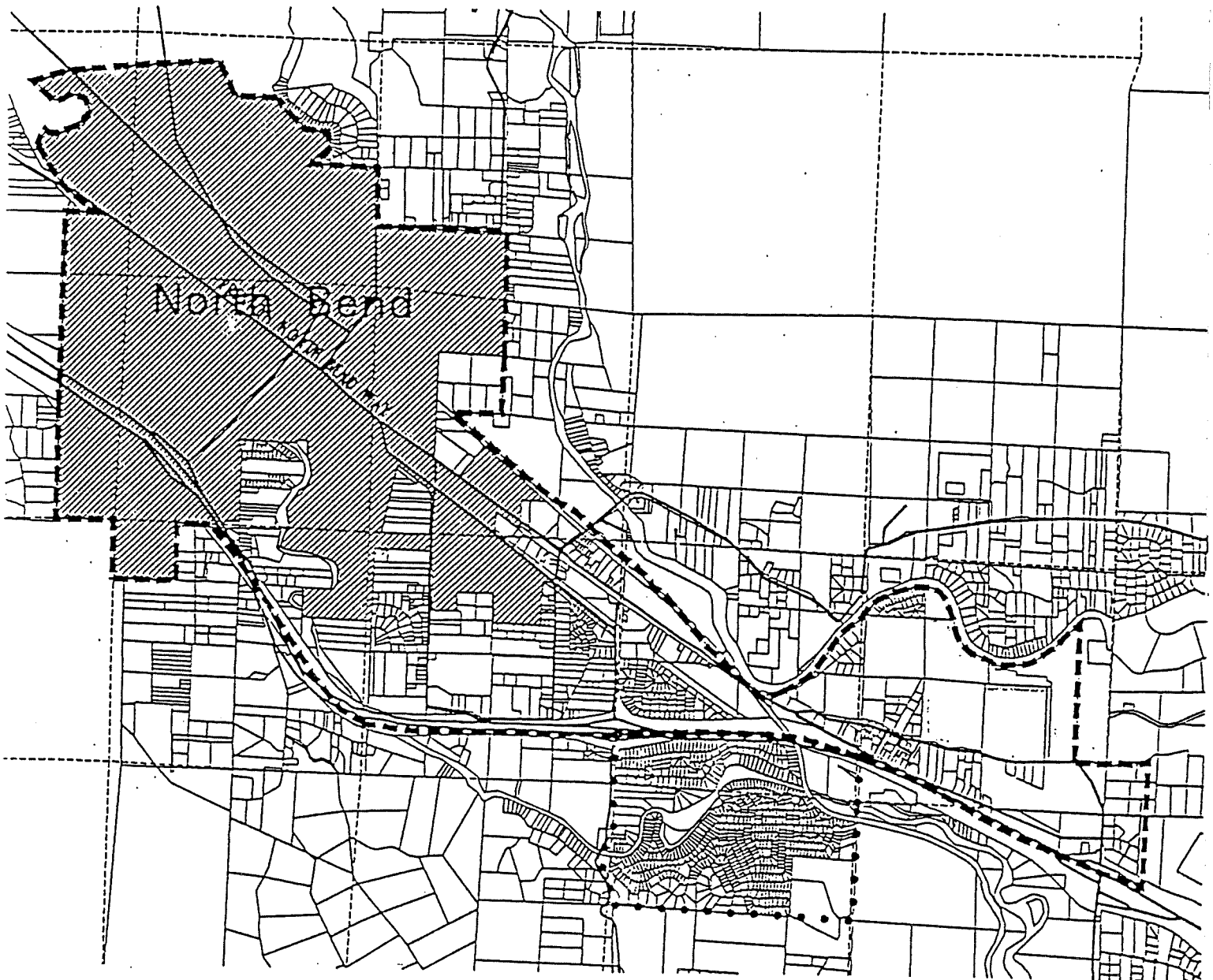
City - County
Recommended UGA



MILES

Urban Growth Area City of North Bend

21

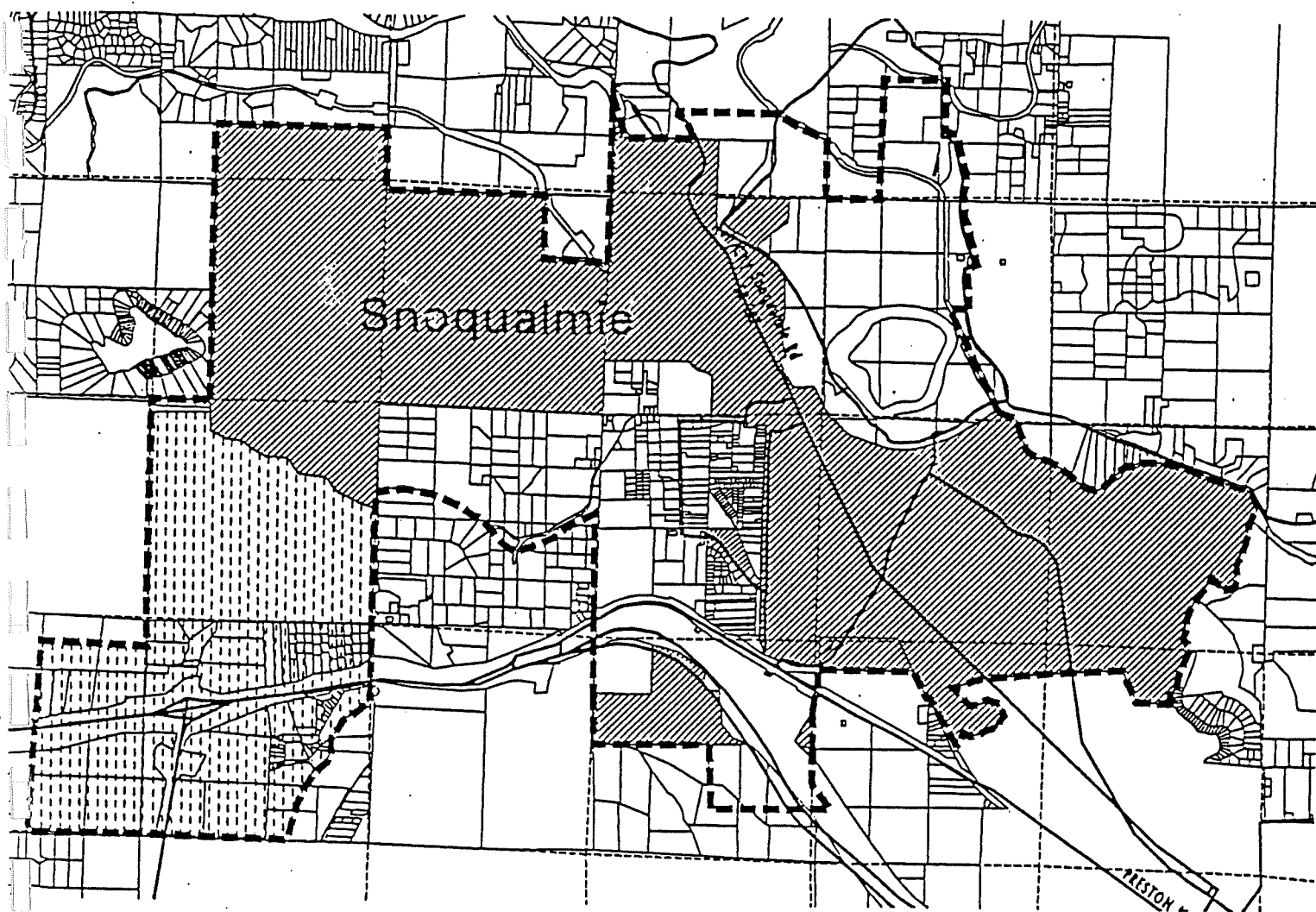


City - County
Recommended UGA

...
Additional Area
Recommended By
King County Staff

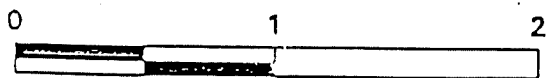
Urban Growth Area City of Snoqualmie

22



City - County
Recommended UGA

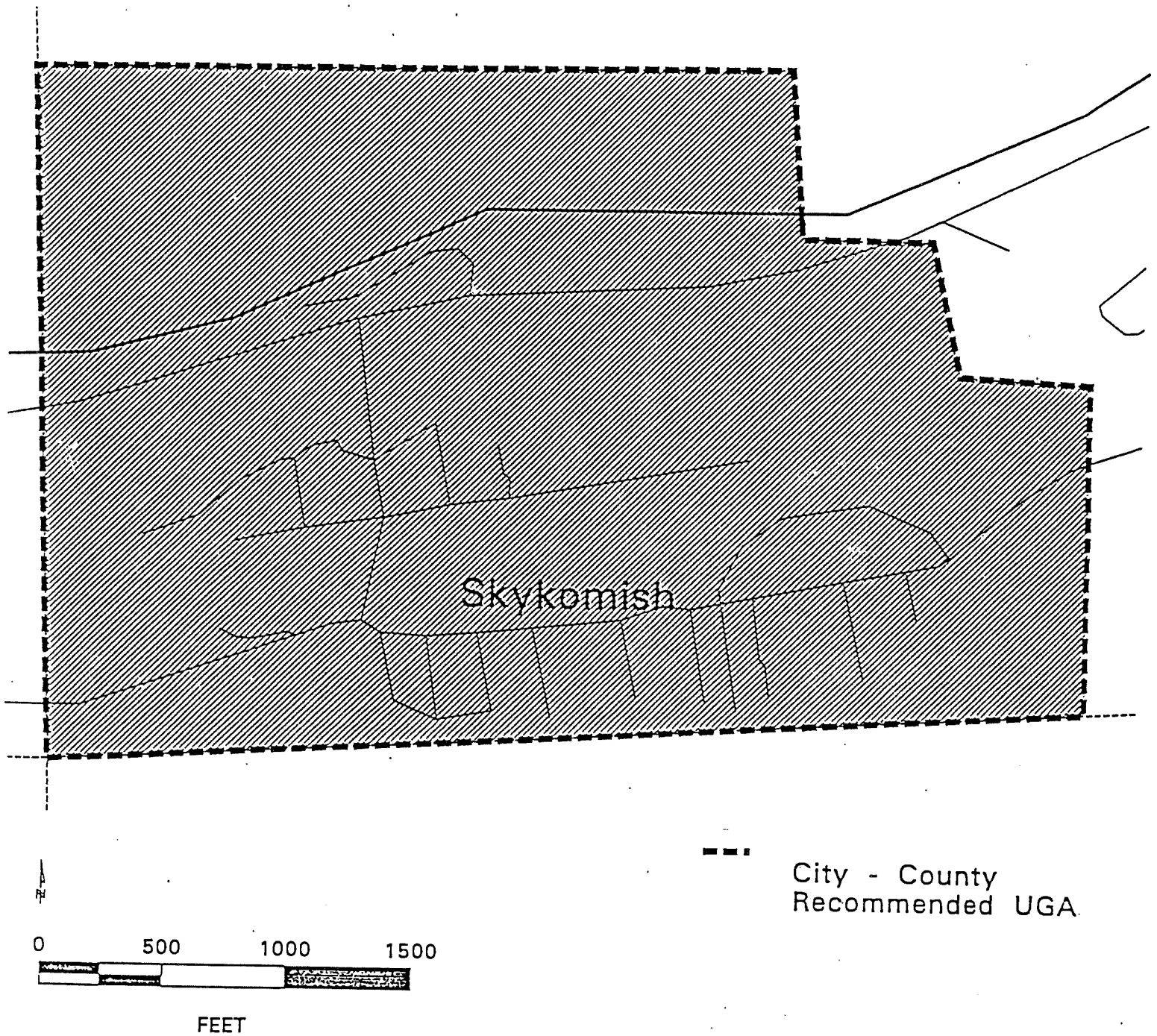
 Joint Planning
Area



MILES

Urban Growth Area City of Skykomish

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**PART TWO: DESCRIPTION AND ANALYSIS OF PROPOSED
AMENDMENTS**

- I. Summary of the Proposed Amendments
- II. Analysis of the Proposed Amendments
 - A. Urban Growth Area
 - B. Centers
 - C. Targets
 - D. Activity Areas
 - E. Other Policy Amendments

I. SUMMARY DESCRIPTION OF THE PROPOSED AMENDMENTS

This FSEIS includes analysis of a package of policy amendments proposed by the Growth Management Planning Council (GMPC). The proposed policy amendments recommended by the GMPC for County Council action through May 14, 1994 contain many features of the five alternatives addressed in the DSEIS. Those policy amendments introduced for action by the GMPC as of May 14, 1994, but not yet considered have also been addressed.

The Proposed Policy Amendments designate the 14 Urban Centers included under the 14 Center Alternative of the DSEIS, and identify jurisdictional targets for minimum household growth and jurisdictional targets for employment growth that results in less growth occurring in those urban centers and more growth occurring in the urban area outside of centers than previously analyzed for the 14 Centers Alternative. The distribution of household and employment growth falls between the 14 and the 8 Centers Alternatives. The Urban Centers include five in Seattle - the Central Business District, First Hill/Capitol Hill, Seattle Center/South Lake Union, Northgate and the University District, and the Bellevue Central Business District, Renton Central Business District, and SeaTac Central Business District. Four Manufacturing/Industrial Centers: North Tukwila, Duwamish and Ballard/Interbay in Seattle, and the Kent Industrial Area are confirmed.

The twenty year countywide target of net new households to be accommodated countywide is 195,000 under the Proposed Policy Amendments. This is less than the 215,000 assumed for the five alternatives analyzed in the DSEIS. The net employment growth target countywide is 347,400. This is essentially the same as the employment target of 340,000 used in the DSEIS. The Urban Growth Area (UGA) -- for which a policy amendment that has been introduced but not yet considered -- is an area that is larger than the 1992 CPP UGA and smaller than the one assumed in the Pre-Countywide Planning Policy alternative of the DSEIS.

The Proposed Policy Amendments include revised and new policies based on the Task Force reports addressing rural character, affordable housing, and fiscal analysis/economic development. These proposed policies were analyzed in the DSEIS. In many cases, the policy language in the reports has been modified without substantial change to the intent or direction of the Task Force recommendation. Additional policy amendments are also recommended based on public comment. The tables in Part One summarize all policy amendments being proposed.

Important policy amendments to the Countywide Planning Policies that have been recommended by the GMPC include:

- Identification of July 1995 as the date by which local jurisdictions shall amend their comprehensive plans to be consistent with these amendments.
- Establishment of a monitoring and benchmarks program to assess progress in meeting Countywide Planning Policies, including the appointment of a Growth Management Monitoring Committee.
- Commitment to maintaining a permanent rural area with review of all Urban Growth Areas ten years after adoption of these amendments.
- Coordinated process for mapping and protecting aquifers needed for potable water.
- Definition of rural character and rural density guidelines.
- Transfer of density from Rural Area properties to other Rural or Urban Area properties, and other strategies to protect rural areas.
- Requirement that Urban Centers demonstrate that an adequate supply of drinking water is available to serve projected growth.
- Identification of advanced technology uses as a desirable use in Manufacturing/Industrial Centers.
- Definition of non-Center Activity Areas to include both commercial development and a mix of housing types with transit and pedestrian emphasis.
- Policies that all jurisdictions provide for housing opportunities for all economic segments of the population.
- The establishment of a countywide committee to develop recommendations for providing low and moderate income housing.
- Revised definition of water systems to serve rural areas.
- Policies encouraging economic development while maintaining the environmental and other goals of the CPPs.
- A policy amendment calling for the development of a Regional Governance Plan.

Other policy amendments introduced but not yet considered by the GMPC for recommendation include:

- A proposed amendment for a one year program that would allow rural land to be added to the urban area in exchange for the dedication of permanent open space at a ratio of 4 acres open space for every 1 acre urban land.
- Policy amendments calling for the development of a Regional Finance Plan and identifying specific finance techniques and strategies to be pursued.

II. ANALYSIS OF THE PROPOSED AMENDMENTS

A. Urban Growth Area

1. Background

RCW 36.70A.110 as amended required counties to designate interim Urban Growth Area by October, 1993. Ordinance 11110 adopted by the King County Council designates an interim urban growth area for King County. The interim Urban Growth Area differed from the 1992 Countywide Policies Urban Growth Area in these respects:

- a. Reflects land use and zoning designations adopted in the East Sammamish Community Plan. Jurisdictions anticipated these changes during completion of the Countywide Planning Policies (see Section 7, Preamble, Ordinance 10450 adopting Countywide Planning Policies), but adoption of the East Sammamish Plan was not yet complete.
- b. Designates an interim Urban Growth Area for the City of Black Diamond. The 1992 Countywide Policies Urban Growth Area boundary followed the Black Diamond city limits.

These and other minor changes shifted approximately three square miles from rural to urban use, decreasing the total lands designated for rural use in July 1992 by the CPP from 330 to 327 square miles. Land designated for urban use, including all cities, unincorporated urban areas, and rural city expansion areas, increased from 448 to about 451 square miles.

2. Proposed Amendments

Proposed revisions to framework policy FW-1 in Step 5 (c) outline how the Urban Growth Area may be amended. The policy stipulates that the Urban Growth Area should be reviewed 10 years after adoption and ratification of the Countywide Planning Policies and may be amended based on factors listed in the policy. These factors include criteria listed in policies LU-14 and LU-15, sufficiency of vacant, developable and redevelopable land to meet projected needs, rate of development and land consumption, capacity of jurisdictions to provide infrastructure, progress towards adopted growth targets, economic, affordable housing, and environmental indicators.

The GMPC has proposed a modification to the 1994 Proposed Urban Growth Area as depicted in the maps in the Appendix to this document. The GMPC calls for the City of Snoqualmie to remove the 2.25 square mile area called the Joint Planning Area from the Urban Growth Area.

3. Amendments Introduced but Not Yet Considered

- a. Proposed changes to the 1992 Countywide Policies Urban Growth Area Map.

The 1992 CPPs called for King County to work with cities in the rural areas to establish urban growth areas (LU-26). Recommendations for urban growth areas are proposed for all rural cities except Black Diamond, still under discussion. In addition,

minor changes negotiated with cities bordering the countywide Urban Growth Area are under consideration.

If adopted as proposed in the 1994 Proposed Urban Growth Area map in the Appendix, an additional area of about 3.3 square miles would shift from rural to urban use (not counting the Snoqualmie Joint Planning Area, which the GMPC recommends not be included in the Urban Growth Area).

b. Proposed Amendment to Policy FW-1 Step 5(d)

This proposed amendment would create a program that would allow for land to be added to the urban area in exchange for the dedication of permanent open space at a ratio of 4 acres open space for every 1 acre urban land. The amendment proposes a one year application period for landowners abutting the Urban Growth Area to submit applications, and one year for the County to review applications and make recommendations. The amendment lists numerous conditions for the applications, such as that urban designated properties must be contiguous to the Urban Growth Area and that open space should be able to connect to adjacent properties. See Part One of this FSEIS for the complete listing of conditions.

The amendment places a ceiling of 4,000 acres (6.25 square miles) of land that could potentially be redesignated from rural to urban use through this program. Up to 16,000 vacant rural acres now designated rural would be affected by this program if implemented up to the ceiling.

The proposed amendment, as drafted, is not clear on whether this open space would be included within the Urban Growth Area or would remain on the rural side of the boundary. In either case, future development of the land would not be possible.

The net impact of proposed changes under consideration as compared to the 1993 Interim Urban Growth Area is to add a minimum of 3.3 square miles (from subparagraph a) and a maximum of 9.5 square miles (including subparagraph b implemented to its fullest extent) to the Urban Growth Area.

C. Environmental Impacts

Proposed revisions to framework policy FW-1 Step 5 (c) requiring reconsideration of the Urban Growth Area every ten years is consistent with the requirements of the Growth Management Act, RCW 36.70A.110. The proposed amendment calls for a balancing of environmental issues with other issues such as land consumption, which would help to mitigate adverse impacts associated with potential amendments to the Urban Growth Area. It is not possible to analyze the extent of impacts or mitigation, as this analysis will not occur before 2004.

Potential changes to the 1992 Countywide Planning Policies Urban Growth Area both recommended and not yet considered, including changes incorporated into the 1993 Interim Urban Growth Area, would amount to approximately 12.5 square miles, as follows:

	Square Miles
Added by 1993 Interim UGA	3.0
Proposed Adds to City UGAs	3.3
Maximum under FW-1 (Step 5(d))	6.2
TOTAL NET AREA AFFECTED	12.5

The potential impact resulting from this proposed change of land designation clearly falls within the range of alternatives analyzed in the DSEIS. The pre-Countywide Planning Policies Alternative, which included the 1985 King County Urban Growth Area as amended by community plans, contains at least 27 more square miles of area designated for urban use over and above the proposed additions detailed in the above Table.

The 12.5 square miles either proposed or under consideration to be added to the urban growth area would increase the urban land capacity estimates by an estimated 15,000 to 17,000 dwelling units (about four percent). This estimate assumes that about one-third of the lands shifted to urban use are already developed and that needs for right-of-way, other public purpose lands, critical area and market constraints would reduce the capacity of the remaining acreage by about one-half. An average residential density of about six units per net acre is assumed in the calculation.

Rural area capacity would be reduced by 4,000 to 6,000 units, assuming an average lot size of about five acres on the high side and somewhat smaller lots in areas with pre-existing lots.

Overall, considering urban additions and rural losses, the proposed changes would produce a net addition of about 11,000 dwelling units to countywide capacity estimates.

The most noteworthy impact would be to the urban area capacity estimate. As shown in Tables 1 and 3 in the Appendix of this document, jurisdictions report a revised dwelling unit capacity for about 398,300 dwelling units. Adding an estimated 16,000 units from proposed changes would bring the total to about 414,300. This number would allow an estimated land capacity 112% in excess of the countywide households target of 195,000 in the GMPC's proposed amendment to CPP LU-28. (The "cushion" of excess capacity would be about 102% if one allows a 5% vacancy factor, converting from households to dwelling units.)

It is important to remember that this capacity estimate has still not been discounted in most cases for the availability of infrastructure such as roads, water, and schools that would be needed to realize the land capacity estimates. On the other hand, the excess capacity more than double the growth target is beyond the 25% recommended by the state Growth Management Division and experience in other growth management states. (See response LA-1 to letter comments for a fuller explanation.)

This 12.5 miles of potential new urban land would produce incremental adverse environmental impacts to water, air, plants, animals and land as a result of future denser developed than would have occurred under a rural designation.

These impacts would be mitigated by the amount of permanent open space associated with the introduced amendment to framework policy FW-1 step 5 (d). Assuming the full 6.25 square miles of urban land allowed under this amendment was approved, 16,000 acres (25 square miles) of permanent open space would be dedicated, removing these lands from future residential use. The amendment calls for the protection of high quality habitat areas where possible within the dedicated open space. This degree of protection would not likely occur under the rural designation. The positive effects on the natural environment resulting from this open space would work to mitigate the adverse impacts associated with urban development in areas redesignated for urban use.

The amendment does not specify where the new urban areas would be added, but calls for an application process to solicit property owners. The minimum property size to be considered, including both the urban and open space components, is 20 acres. Smaller lots are allowed to be consolidated to meet the 20 acre minimum.

A preliminary count of parcel sizes along the principal north/south Urban Growth Area boundary indicates that there are approximately 250 parcels over six acres in size. (Note: this parcel count included the City of Black Diamond, as it is contiguous to the larger Urban Growth Area, but did not include the other rural cities.) There are several large land holdings along the Urban Growth Area boundary which, if property owners applied to this program, would result in concentrations of new urban growth and open space. These include the area along 1-90 known as Grand Ridge, and areas around the cities of North Bend, Black Diamond and Snoqualmie. Since the amendment calls for a future program and no proposals exist, impacts cannot be evaluated on a site by site basis at this time, and should be assessed in subsequent environmental documents.

There is not yet a proposed or introduced amendment relating to the Black Diamond Urban Growth Area. The 1993 Interim Urban Growth Area did designate a Black Diamond Urban Growth area of approximately 450 acres. The City has proposed and analyzed environmental impacts of a larger Urban Growth Area of approximately 3400 acres. The city has stated their goal of achieving 50% open space within their Urban Growth Area. Impacts of potential changes to the Black Diamond Urban Growth Area will have minimal countywide impacts, but may have subarea or local impacts. These impacts should be analyzed in the environmental review of the King County and Black Diamond Comprehensive Plans.

B. Urban and Manufacturing/Industrial Centers Designation

1. Background

The Countywide Planning Policies (CPPs) adopted in July 1992 and then ratified by the cities called for nominations of Urban and Manufacturing/Industrial Centers in policies FW-11 and FW-12, respectively. The procedures to be followed were specified in LU-28 for Urban Centers and LU-39 for Manufacturing/Industrial Centers.

Following criteria specified in policy LU-29 for Urban Centers and in LU-40 for Manufacturing/Industrial Centers, local jurisdictions submitted their nominations for Centers to the GMPC for its review.

2. Proposed Amendments

The GMPC adopted proposed amendments to LU-28 and LU-39 which recommend confirmation of the nominations advanced by the jurisdictions, as follows:

a. Urban Centers

Bellevue CBD
Federal Way CBD
Kent CBD
Kirkland Totem Lake
Redmond CBD
Redmond Overlake
Renton CBD
Seattle CBD
Seattle Center
First Hill/Capitol Hill
University District
Northgate
SeaTac CBD
Tukwila CBD

b. Manufacturing/Industrial Centers

Seattle Duwamish and Interbay Industrial Areas
Kent Industrial Area
North Tukwila Industrial Area

3. Amendments Introduced but Not Yet Considered

The introduced amendments to policy LU-29, both in the text and preamble, clarify the distinction between the criteria for Urban Centers, which frame the long-range vision and address zoning, and 20 year growth targets for Centers, which address growth plans for the next 20 years and are attentive to the needs for infrastructure, services, and the incentives needed to make Centers a reality.

4. Environmental Impacts

The 1992 proposed Centers amendments follow the process established in the CPPs. The impacts of the designations fall clearly within the range of alternatives examined in the DSEIS. The Centers analyzed in the 14 Centers Alternative are the same ones recommended by the GMPC.

The distribution of growth under the proposed policy amendments is different than assumed in the DSEIS 14 Centers Alternative. The cumulative effect of these changes in distribution is to decrease the number of net new households going into the 14 Urban Centers, from 86,000 to 57,400 as depicted in Table 5 in the Appendix of this document; and to decrease the number of net new jobs going into the 14 Urban Centers from 251,600 to 181,600 as shown in Table 6.

Households. The households that would have gone into the Centers will now locate in non-Center Urban Areas. However, because the GMPC proposed less household growth countywide in its May 14, 1994 amendment proposals, as described below in subsection C, the total number of households "shifting" from Centers to non-Center Urban Areas is reduced.

Under the "old" countywide households growth total of 216,200 that was considered by the GMPC on April 6, 1994, 151,100 households would have located in non-Center Urban Areas. This number is reduced to about 129,900 under the GMPC-proposed countywide target of 195,000 households.

As summarized in Figure 1 in the Appendix, there appears to be more than sufficient land capacity to accommodate this shift. In the 14 Centers Alternative, non-Center Urban Areas have a discounted land capacity for new dwelling units that exceeds the revised growth target for these areas by 57%. (The capacity "cushion" is 50% if one introduces a 5% housing vacancy factor to convert from households to dwelling units.)

This is a conservative estimate because Figure 1 is based on the countywide growth target for households of 216,200 that was considered by the GMPC on April 6, 1994. Using the revised non-Center households total of 129,900 for 20 years, the capacity "cushion" expands to 83% (74% if one introduces the 5% housing vacancy factor).

The overall, cumulative effect of the proposed amendment to LU-28 would cause a relative shift of environmental impacts and costs to non-Center Urban Areas. For the reasons given, however, the impact of the shift in absolute terms is reduced greatly by the overall reduction in household growth. Instead of the 124,700 net new households shown in the DSEIS growth target in Figure 1, the proposed amendments to growth targets would require the location of about 129,900 net new households in the non-Center Urban Areas.

Comparing the household distribution under the proposed amendment to LU-28 with the DSEIS alternatives depicted in Table 1 of the DSEIS, the GMPC recommendation comes closest in quantitative terms to the Eight Centers Alternative: instead of 40% of net new households in 14 Centers in Table 1, the revised 14 Centers would accommodate 27% of the growth; this comes very close to the 24% assumed in the DSEIS Eight Centers alternative shown in Table 1. Comparison of household distributions in the non-Center Urban Areas also shows a shift toward the Eight Centers Alternative in aggregate quantitative terms.

Employment. The situation for the jobs shifted out of Centers to non-Center Urban Areas is different. As discussed in subsection C, the GMPC recommended no significant countywide decrease to the 20 year employment targets. As a result, 70,000 jobs that were assumed to go into Urban Centers in the DSEIS analysis will now have to locate in non-Center Urban Areas.

Figure 2 in the Appendix suggests that there appears to be sufficient discounted land capacity in these areas to absorb the substantial increase in growth created by the shift of new job growth outside of Urban Centers. A "cushion" of approximately 40% is suggested by the figure.

The Manufacturing/Industrial Centers proposed for designation in the recommended amendment to LU-39 are the same as analyzed in the DSEIS. There are no proposed changes to the shares of growth assumed in the DSEIS. The impact analysis for Manufacturing/Industrial Centers, therefore, stands as presented in the Draft document.

Comparing the employment distribution under the proposed amendment to LU-39 with the DSEIS alternatives depicted in Table 1 of the DSEIS, the GMPC recommendation comes closest in quantitative terms to the Eight Centers Alternative shown in Table 1 of the DSEIS: from 74% in the DSEIS 14 Centers Alternative to 52% in the recommendation, which is very close to the 49% in Urban Centers shown in the Eight Centers Alternative in Table 1. A similar shift is observed in the non-Center Urban Areas.

Centers Criteria and Targets. The proposed amendments to policy LU-29, which have been introduced but not yet considered, introduce a key distinction between Centers criteria and 20 year growth targets. The proposed language outlines a long-range vision for the Urban Centers concept while allowing that jurisdictions may take longer than 20 years to achieve the policy criteria of 50 jobs and 15 dwelling units per gross acre.

Tables 5 and 6 in the Appendix of this document specify jurisdictional plans for their proposed Centers, for the 20 year period and beyond, and include information on both growth targets and land capacity.

C. Growth Targets for Households and Employment

1. Background

The CPPs called for the development of growth targets for both net new households and employment in policies FW-1 and LU-51 through LU-53. Jurisdictions working together through an interjurisdictional staff team recommended growth targets both countywide and for individual jurisdictions, as well as target ranges, to the GMPC on April 6, 1994. These jurisdictional targets replace those based on generalized land uses that were examined in the DSEIS.

2. Proposed Amendments

In its proposed amendment to LU-52, the GMPC recommends adoption of a minimum countywide growth target for households that is 9.8% less than the 216,200 proposed

by interjurisdictional staff and considered by GMPC on April 6, 1994. The proposed net new households minimum target threshold of 195,000 is recommended in the text of the policy; an attached chart, which presents targets for each of 34 jurisdictions, has a slightly different total of 195,700.

The GMPC action follows from documentation prepared by staff which shows that this reduced number of households will be sufficient to accommodate the growth forecast of 325,800 more people in 20 years that has been mandated for King County by the state Office of Financial Management. This assumption turns on the expectation that the average King County household will decline in size from 2.4 to 2.2 persons between 1990 and 2010, as described in response LA-8 to letter comments presented in the last chapter of this document.

The proposed companion amendment for jobs (LU-53) proposes no significant change from the job targets considered by the GMPC on April 6. In the chart attached to the proposed amendment, 347,400 new jobs are targeted countywide for the 20 year period; this compares with the figure of 349,600 proposed on April 6.

The GMPC did not recommend growth ranges for either households or employment in their proposed amendments.

3. Environmental Impacts

Overall, the impacts associated with the proposed growth target amendments fall clearly within the range of alternatives analyzed in the DSEIS. The jurisdictional targets for Centers and non-Center Urban Areas are different from those in the DSEIS, as described and analyzed above in subsection B. The jurisdictional growth targets for jurisdictions and those in the DSEIS are not different for Manufacturing/Industrial Centers or unincorporated Rural Areas.

The effect of the proposed amendment to adopt targets in policy LU-52 will have the general effect of lessening adverse environmental impacts within the Urban Growth Area. When combined with the Centers household amendment described in subsection B, the growth targets amendment for households would produce a small adverse incremental impact in non-Center Urban Areas to air, water, plants and animals, and land by virtue of the greater growth there. This is more than offset by the reduced growth targeted for Urban Centers. Mitigation measures for compact growth discussed in the DSEIS would appear adequate to handle the slight growth increase in non-Center Urban Areas.

Overall, the effect of the proposed amendment to LU-53 will be very little different from the employment impacts described in the DSEIS, which assumed a countywide growth of 340,000 jobs for 20 years.

One feature of the combined targets amendments for households and jobs should be noted. By reducing the number of households without adjusting the jobs target, the balance between housing and jobs in King County is affected. Although the shift in the households target will not reduce population growth directly -- the target number depends on the average household size, as noted -- it may do so indirectly by discouraging jurisdictions from zoning for additional housing beyond the minimum needed to accommodate growth targets.

If this happens, the number of workers "imported" from surrounding counties to fill King County jobs may be expected to increase by an indeterminate amount. In 1992, there were a total of nearly 950,000 jobs in King County, while the resident employment was about 833,000. This suggests that upwards of 100,000 King County jobs were filled by non-County residents commuting into King County and its cities.

Additional emphasis on public transit and measures to discourage single occupant vehicle (SOV) use would be appropriate to address this possible impact.

D. Activity Areas

1. Background

The proposed policy amendments from the GMPC establish a new land use section to the Countywide Planning Policies entitled Activity Areas. To establish this new section, policies from the Countywide Planning Policies adopted July 6, 1992, were moved and amended. The intent of this action to establish a separate section of the Land Use policies chapter is to emphasize the importance of these smaller scale "centers". Designation and zoning for Activity Areas remain locally determined through comprehensive plans. Most jurisdictions in the urban area of King County have areas that could be considered local candidates for Activity Area development.

2. Proposed Amendments

The proposed amendments delete language which referred to Activity Areas as locations for moderate concentration of commercial land uses with residential uses being "adjacent". Policy language was added that emphasized that the mix of uses was a local determination and added framework policies showing the role of activity centers in meeting CPP goals. The framework policy identifies that the array of land uses would include commercial development and housing designed to encourage transit and pedestrian uses, with disincentives on single occupant vehicle use. Jurisdictions are encouraged but not required to establish minimum and maximum parking requirements. Superior urban design reflecting the local community and open space are identified as important. A requirement for maximum densities is deleted. The frequency and type of transit service would be based on the actual development with the Activity Area of sufficient employment and household densities to support transit.

3. Environmental Impacts

The VISION 2020 plan and EIS recognized Activity Areas as important components of a regional strategy. This action is consistent with the analysis in that EIS which this SEIS supplements.

Including a mix of housing types in the definition of Activity Areas provides for greater area for development of housing inside the Urban Growth Area which should mitigate the impact of the Urban Growth Area on housing affordability. The inclusion of housing with commercial uses also serves to reduce trip lengths and mitigate traffic congestion. The use of these areas for a mix of uses could also reduce the pressure to develop critical environmental areas within the Urban Growth Area.

Local actions will determine that actual design and density of the Activity Area. It is clear that the intent of these policies is to encourage transit and pedestrian usage and create areas that provide for a quality urban environment. There is an overall beneficial impact to this proposed policy amendment.

E. Other Policy Amendments

1. **Background**

Most of the policy amendments proposed for action were analyzed in the DSEIS. The monitoring and benchmarks program was analyzed as part of the Magnet Alternative and also recommended as mitigation to a number of potential impacts in the other alternatives. The rural, affordable housing, and economic development policy amendments were analyzed in the DSEIS. While the text of the task force amendments has been changed to reflect public comment received during the comment period for the DSEIS, the nature of the impacts remains the same. As stated in the DSEIS, these amendments provide for greater beneficial impacts on the environment than the Countywide Planning Policies without the amendments.

2. **Proposed Amendments and Environmental Impacts**

Several amendments address water: the development of a coordinated process of mapping and protecting aquifers needed for potable water supplies, a requirement that urban centers demonstrate availability of water, and revised definition of water systems to serve rural areas. These amendments reflect public comment received in response to the DSEIS and should positively impact the availability of potable water to future King County residents.

The identification of advanced technology uses as a desirable use in Manufacturing/Industrial Centers clarifies the definition of manufacturing/industrial uses to include advanced technology which is important to King County's economy. This clarification results in no change to the impact analysis.

The substitution of transit incentives for parking disincentives to encourage a decrease in single-occupancy non-commercial vehicle trips in Manufacturing/Industrial Centers could result in a more effective decrease in single-occupancy trips than the other policy. This mitigates traffic congestion.

Including a mix of housing types in the definition of Activity Areas provides for greater area for development of housing inside the Urban Growth Area which should mitigate the impact of the Urban Growth Area on housing affordability. The inclusion of housing with commercial uses also serves to reduce trip lengths and mitigate traffic congestion. The use of these areas for a mix of uses could also reduce the pressure to develop critical environmental areas within the Urban Growth Area. There is an overall beneficial impact to this proposed policy amendment.

The policy for the development of a Regional Governance Plan could result in significant impacts to King County (both beneficial and negative). However, without the specifics of the plan it is not possible to address the nature of the impacts.

The amendment calling for the development of a Regional Finance Plan and related policies addressing finance techniques and strategies will have fiscal impacts. Fiscal

impacts were determined to be outside the scope of the SEIS during the scoping period. These policies are aimed at achieving concurrency between governmental services and growth, which is a requirement of the GMA.

PART THREE: RESPONSES TO COMMENTS AND TESTIMONY

- I. Introduction (IN-1 to IN-12)
- II. Land Uses (LA-1 to LA-53)
- III. Affordable Housing (HO-1 to HO-15)
- IV. Transportation (TR-1 to TR-30)
- V. Infrastructures and Services (IS-1 to IS-45)
- VI. Natural Systems (NS-1 to NS-30)
- VII. Economic Development (EC-1 to EC-19)

The Responsible Official for the DSEIS received 74 separate letters commenting on the document by the February 28, 1994 deadline for receiving public comments. In addition, 45 individuals appeared before the Metropolitan King County Council Growth Management, Housing and Environment (GMH&E) Committee on February 9, 1994 to testify on the DSEIS. This section of the FSEIS responds to comments received in both the letters and the written testimony and transcription of comments made to the GMH&E Committee on February 9.

Critical comments on the DSEIS are responded to in this part of the FSEIS. Uncritical comments or those expressing preference for a particular DSEIS alternative or policy are not responded to in this document. These comments speak for themselves and are included in Part IV as part of the public record for officials and citizens to examine as they reach a final decision on possible refinements to the Countywide Planning Policies.

This part of the document contains responses to issues and concerns raised in the comments received. Letters and testimony expressing similar concerns are grouped to facilitate efficient response to comments. Each issue is framed as a statement or question on a particular subject. This is followed by a listing of the names and organizations of those writing letters or testifying before the Committee. This listing will give the general reviewer a sense of how many letters expressed similar concerns about selected topics.

New information not available at the time the DSEIS was written is included in the Appendix, where appropriate, and referenced in responses to the selected issues or questions. However, the scope of the DSEIS has not changed.

Part IV presents the letters received in alphabetical order followed by the transcribed testimony before the GMH&E Committee and written testimony left with the GMH&E. Letters and testimony presented in these sections have been coded in the margins to allow the author to find responses in Part III to the specific issue or question raised. For example, a letter writer expressing criticism of the land capacity methodology is referred to the response to issue LA-1 (Land Use - Response #1).

The coding scheme used in this part of the FSEIS follows the Chapter organization of the DSEIS, as follows:

<u>Section</u>	<u>Chapter Of DSEIS</u>	<u>Code</u>
I.	Introduction	IN
II.	Land Use (1.0)	LA
III.	Affordable Housing (2.0)	HO
IV.	Transportation (3.0)	TR
V.	Infrastructure and Services, including Human Services (4.0) Police/Fire/Emergency (5.0) Schools (6.0) Parks and Open Space (7.0) Water Supply (8.0) Stormwater (9.0) Sewer/Septic (10.0) Solid Waste (11.0) Utilities (12.0)	IS
VI.	Natural Systems, including Sensitive Areas/Resource Lands (13.0) Air Quality (14.0) Water Quality (15.0) Plants, Fish, Animals (16.0) Noise (17.0)	NS
VII.	Economic Development (18.0)	EC

I. INTRODUCTION

IN-1 *The DSEIS was issued while the Countywide Planning Policies (CPPs) were still being refined by the Fiscal/Economic Development (Fis/ED), Affordable Housing and Rural Character Task Forces. Therefore, another SEIS should be done when the CPPs (including a final urban/rural boundary) are done, to comply with SEPA requirements for "phased review."* Allan, City of Pacific, Weyerhaeuser

IN-1a *The DSEIS should explain how the CPPs fit in with other actions needed to comply with the Growth Management Act (GMA), since some of these will come after the Final SEIS.* King County Department of Public Works (DPW), City of Seattle, City of Sea-Tac

If the proposed policy amendments resulting from the GMPC's decisions on the task forces' recommendations fall within the range of alternatives discussed in the DSEIS in terms of its impacts, additional SEPA review will not be required. See Section II for a description and assessment of these proposed policy amendments. Also see responses to land capacity comments, LA-1 through LA-4, which contain updated figures on growth targets.

Regarding comment 1a, see page vi of the Executive Summary and page 1, column 1 of the DSEIS itself, and Sections 3 and 6 of King County Ordinance 10450, by which the King County Council adopted the Countywide Planning Policies (CPPs). In addition to the information provided by this SEIS and two fiscal analysis reports by the Fiscal Analysis and Economic Development Task Force (Fis/ED), the GMPC is also considering public input on the CPPs and location of the urban growth area boundary before finalizing their recommendations on the CPPs and their "Phase II" refinements.

When adopted by the Metropolitan King County Council and ratified by 30 percent of the city and county governments representing 70 percent of King County's population, the refined CPPs will provide general guidance for the comprehensive plans of King County and the cities. Because of the GMA's tight deadlines, much of this planning work is occurring simultaneously; as each jurisdiction reviews and adopts its plan it possibly will need to make last-minute adjustments for consistency with the finalized CPPs; since a sizable effort has gone into interjurisdictional coordination, such adjustments should be minor.

IN-2 *The proposal is not adequately defined. How can its impacts be analyzed without including implementing measures? What information is missing or unobtainable as defined in WAC 197-11-080? More quantitative analysis is needed. All possible alternatives should be considered.* Allan, Weyerhaeuser, City of Snoqualmie, City of Des Moines, East Sammamish Community Council, Boeing, Sanderson, Sterling Realty Organization, Muckleshoot Indian Tribe, Seattle Master Builders, Hinds, Washington Natural Gas, Fis/ED Task Force (Barden, Imperatori, Washburn, Seaman), 1000 Friends of Washington, McIntosh, Hedges & Roth (Nilon), Quadrant, City of Renton, Lappenbush, Greater Maple Valley Area Council

Regarding level of detail and relationship of the proposal to implementing actions, it should be kept in mind that the CPPs' role under the Growth Management Act is to

provide "a countywide framework from which county and city comprehensive plans are developed and adopted pursuant to this chapter. This framework shall ensure that city and county comprehensive plans are consistent...." (RCW 36.70A.210.1) Comprehensive plans, in turn, are to be the policy basis for development regulations and capital budget decisions. (RCW 36.70A.120) The Growth Management Act does not specify a required level of detail for the CPPs, but it is clear that they do not need to be as detailed as comprehensive plans, and that they do not have the same relationship as comprehensive plans to implementation measures. The alternatives, information and level of detail of analysis in the DSEIS are appropriate to the level of detail of the action itself, and are consistent with the requirements for nonproject EISs set forth in WAC 197-11-442.

IN-3 *The DSEIS should identify and analyze a preferred alternative. The No Action Alternative should be used as a baseline for comparison. Will a preferred alternative be chosen by the Growth Management Planning Council (GMPC) or some public process?* Allan , City of Renton, Muckleshoot Indian Tribe

This document contains the set of GMPC recommended amendments to the Countywide Planning Policies (CPPs) which together constitute a preferred alternative. These proposed refinements represent the GMPC's actions after considering changes proposed by its three Task Forces and public comments (see Part Four below).

IN-4 *The DSEIS should analyze the fiscal impacts of the alternatives. How will a separate fiscal analysis be reconciled with the DSEIS' conclusions?* City of Snoqualmie, Blue, West One Bank, East Sammamish Community Council, Weyerhaeuser, Harman, Keesling, Hedges & Roth (Nilon), King County League of Women Voters, Seattle-King County Assoc. of Realtors, Seattle Master Builders, Winbauer, Fis/ED Task Force (Washburn, Imperatori), Sterling Realty Organization, Lowe Enterprises Northwest, Federal Way Water & Sewer, Washburn

IN-4a *The SEIS should not be used alone; other information, such as the Fis/ED's reports on regional finance and fiscal analysis of the alternatives should be used to make decisions.* City of Seattle, King County Leagues of Women Voters, Suburban Cities Association

In accordance with Ordinance 10450, the Fis/ED Task Force is conducting analysis of the CPPs' fiscal impacts. At about the time this Final SEIS is issued, the Fis/ED should be issuing two reports, one on regional financial capabilities, and one on the fiscal impacts of growth under the no action and centers alternative scenarios. This use of other analysis to supplement that contained in the DSEIS is consistent with the options provided for in WAC 197-11-448 as well as Ordinance 10450.

IN-5 *The DSEIS should discuss social and economic issues.* Glase, Keesling, African-American Agenda, Lowe Enterprises Northwest, Sterling Realty Organization

IN-5a *The DSEIS, specifically the Economic Development chapter, discusses social and economic issues specifically not required to be discussed by WAC 197-11-448. "Economic development" is not an element of the environment as defined by SEPA.* City of Seattle

Social and economic issues were discussed in several chapters of the DSEIS: Housing Affordability (2.0), Human Services (4.0), and Police/Fire/Emergency (5.0).

The City of Seattle's comment is acknowledged. Although economic development is not a required area of impact analysis under SEPA (elements of the environment, WAC 197-11-444, it is an important component of the Growth Management Act (see RCW 36.70A.020.5, planning goals, and RCW 36.70A.210.3.g), and therefore is discussed in the SEIS as part of the overall approach to fostering public participation in all aspects of planning under GMA. "Social" elements are covered in the impact analysis of the DSEIS under the Built Environment (WAC 197-11-444(2)) topics of the document.

IN-6 *The alternatives are not defined in a way that makes useful comparisons possible, and are not related to the CPPs. If all alternatives have the same policies, land capacity and urban/rural boundary (which was adopted with no environmental review), then most really important choices have been defined out of the discussion. The Magnet Alternative is presented more like a list of possible mitigating measures than a true alternative growth scenario.* Fis/ED Task Force (Barden), City of Seattle, Elfelt, Harman, Sanderson, Strosahl, Fletcher

IN-6a *The alternatives need to be better described and compared. There needs to be more quantified information. Where are growth targets by jurisdiction? Alternatives should be ranked on various impacts in such a way that the public gets a sense that, for example, alternative A has a 10 percent greater impact than alternative B on traffic congestion.* Harman, Blue, Suburban Cities Association, City of Des Moines, City of Renton, Halstrom

Regarding comment IN-6a, see response to IN-2 regarding level of detail of the CPPs. Growth targets were not available when the DSEIS was issued; see response to LA-7 below for growth targets by jurisdiction.

The DSEIS's treatment of the CPPs and the alternatives is consistent with the requirements for nonproject EISs set forth in WAC 197-11-442. The presentation of the Magnet Alternative is consistent with the intent of its proponents.

Because the CPPs are general they may accommodate a variety of growth patterns, and both the Eight and 14 Center Alternatives are based on the same set of countywide policies with different assumptions about how various cities' comprehensive plans accommodate their shares of the County's forecasted growth over the next 20 years. The alternatives would differ in the spatial distribution of land capacity (more high-density zoning would be available under the 14 Center Alternative, for example, than under the Eight Center or No Action Alternatives). See also the responses to land capacity questions, LA-1 through LA-4 below.

The choice among alternatives and whether to significantly shrink or expand the countywide urban growth area are policy issues rather than technical ones. It is acknowledged that, with one important exception (the pre-Countywide Planning Policy Alternative), the urban growth area boundary for all alternatives is the same, based on the 1985 King County Comprehensive Plan as refined by subsequent unincorporated area community plans and the addition to the rural area adopted in the 1992 Countywide Planning Policies.

The GMPC recommended a rural area of about 334 square miles when it adopted the CPP in July 1992, as described on DSEIS page 18. This recommendation was subsequently adopted by the King County Council and then ratified by cities. Since that time, additional changes to the rural area have occurred, primarily as a result of the adoption of plans for the Northshore and East Sammamish community planning areas. The Interim Urban Growth Area adopted by the King County Council in November 1993 reduced the overall size of the rural area to approximately 327 square miles.

Further changes have been proposed since November 1993 as a result of recommendations on rural city expansion areas, on technical review areas designated for further study by the GMPC, and on a series of technical refinements to the Urban/Rural line. The 1994 Proposed Urban Growth Area and line are depicted in the series of four maps in the Appendix. The 1994 proposed Urban Growth Area would reduce the overall size of the rural area to about 322 square miles.

(Note: GMPC action on May 14, 1994 recommended deleting the Snoqualmie Joint Planning Area from the UGA. An amendment introduced but not yet considered at that meeting would have the effect of redesignating as much as 6.25 square miles of rural land to urban status for residential use. See the discussion of environmental impacts associated with these proposed changes in response LA-27 below and in Part Two, II(A) above.

IN-7 *The Executive Summary incorrectly characterizes the CPPs as "only a framework," when under GMA they are mandatory and will control local comprehensive plans.* City of Snoqualmie, Elfelt

Comment acknowledged. The intent of this phrase was to characterize the CPPs' level of detail, not their legal relationship to city and county comprehensive plans.

IN-8 *The treatment of mitigation measures is too general. The feasibility and cost of such measures also should be addressed.* Allan , East Sammamish Community Council, City of Renton, Leagues of Women Voters of King County, Fis/ED Task Force

See responses to IN-2, IN-6 and IN-6a above. Again, the level of detail is consistent with the characteristics of the proposed action and the requirements for nonproject EISs set forth in WAC 197-11-442. Also, for a policy-based nonproject action mitigation can include future modifications beyond the range of alternatives discussed in the DSEIS to reflect changed circumstances or to correct unwanted impacts. This is why monitoring such indicators as land consumption is called out as a mitigation measure, and it is why GMA specifically provides for reassessment of comprehensive plans if facilities are inadequate (RCW 36.70A.070.3.e), and for review of the urban growth area boundary every 10 years (RCW 36.70A.130.3).

IN-9 *The DSEIS is inadequate because it does not analyze impacts caused by adoption (via the 1993 East Sammamish Community Plan Update) of a different urban-rural line than was recommended by the GMPC when it adopted the CPPs. Since changes to the 1992 urban-rural line are before the GMPC, the SEIS should cover these so additional environmental review is not needed later.* Allan , Elfelt, Sanderson, Suburban Cities Association, Pacific Properties

In adopting the CPPs in 1992, the King County Council made the following finding:

"7. With respect to the Urban Growth Area (UGA) Boundary a number of study areas have been identified which require additional consideration by the GMPC. These study areas are identified on the GMPC Recommended Urban Growth Area map. For the East Sammamish area, the GMPC determined that the area should be further evaluated and possibly revised based on the East Sammamish Community Plan Update process which is now under way and which will be completed in January 1993. Recommendations on the UGA Boundary will be developed in cooperation with the affected cities, neighborhoods, property owners and the general public. Changes to the adopted UGA Boundary may be recommended to the county by the GMPC and subject to adoption and ratification."

At its June 16, 1993 meeting, the GMPC decided to use the boundaries recommended by the East Sammamish Community Plan for analysis in this SEIS. On May 25, 1994, the GMPC will make its final recommendation on the UGA boundary. The 1994 proposed UGA is depicted in maps in the Appendix and impacts are assessed in response LA-27.

IN-10 *The DSEIS should explain the relationship of the alternatives to pre-GMA plans and other documents. Are alternatives based on pre-GMA plans (e.g. the 1985 King County Comprehensive Plan) legal under GMA, or will we have to do this over again? What about possible changes to the CPPs by the GMPC not covered by this SEIS?* Allan, East Sammamish Community Council, Elfelt, City of Pacific, City of SeaTac

See the responses to IN-6 and IN-6a above. Pre-GMA plans, development regulations and other implementing actions are legal under GMA if they are consistent with the most current adopted/ratified CPPs and meet the requirements for plans set forth in RCW 36.70A.070 and elsewhere in the Act. Development regulations, capital budget decisions and other implementing actions must be consistent with comprehensive plans. Changes proposed to the CPPs by the GMPC are detailed in Part One of this Final SEIS.

IN-11 *The DSEIS states that all alternatives guide urban development into areas that already have urban facilities and services (pp. ii, vi, xii, etc.). It also says that no new urban centers have been designated since the 1985 King County Comprehensive Plan (p. 20). But the 1989 Bear Creek Community Plan designated the Bear Creek "Master Planned Communities" (MPDs) as urban centers, despite the fact that the site is not a city and does not have urban services. These statements in the DSEIS should be deleted, or the Bear Creek MPDs should be called out as an exception to this language, or the MPDs should be deleted from the proposed urban growth area and CPP LU-14b.* Elfelt

Comment acknowledged. The Bear Creek MPDs should have been called out as an exception to the statements cited. See also responses to IN-6 and IN-6a above.

IN-12 *The SEIS should include the Snoqualmie Joint Planning Area (JPA) in one of the alternatives, since was designated in the Snoqualmie Valley Community Plan, and it is going to be part of the City of Snoqualmie's UGA.* PugetWestern, Weyerhaeuser

The Snoqualmie Valley Community Plan did not direct that the entire JPA be redesignated from rural to urban. The Countywide Planning Policies (CPPs) are silent on this issue; the area referred to is shown as rural on the UGA Boundary map recommended by the GMPC in 1992, but shown as UGA on the draft King County Comprehensive Plan map circulated for public comment in April, 1994 and included in the Appendix of this document. See also the discussion in Part Two of this Final SEIS; the GMPC recommended that the Snoqualmie JPA not be included in the city's UGA at its May 14, 1994 meeting.

II. LAND USE

LA-1 *Are there flaws in the methods used to estimate land capacity in the DSEIS? What factors do the land capacity estimates take into account and are any key factors left out of the calculations?* Allan, Blue, West One Bank, Lozier Homes (Burckhard)(Lappenbusch), McIntosh, Fis/ED Task Force (Barden), 1000 Friends of Washington Seattle-King County Assoc. of Realtors, Federal Way Water & Sewer, Sterling Realty Organization, Segner, Lowe Enterprises Northwest, Muckleshoot Indian Tribe, Master Builders Association, Vance, Quadrant (Fitzgerald), Upper, Spence, Dankelson, Washburn, Imperatori, Seaman, Burrows, League of Women Voters of King County, Greater Maple Valley Area Council

The methods used to estimate land capacity in the DSEIS are based upon the work undertaken by the interjurisdictional Data Resources Technical Forum (DRTF) between 1991 and 1993. The methods recommended by the DRTF are described and documented on pages 15-17 of the DSEIS and in a preliminary draft report issued by the DRTF in September 1992.

Jurisdictions used the DRTF methods or a similar method in their land capacity work. Where local practice varied from DRTF recommendations, this fact and the reasons for it have been documented by the jurisdiction. Jurisdictions produced estimates for both vacant lands and those judged to have potential for redevelopment. Both residential and commercial/industrial capacity estimates were produced.

Comments received on the DSEIS touched on one or more of the following factors used in the land capacity methodology:

- (a) *yields allowed under current zoning: dwelling units per gross acre (for residential zones) and floor area ratios (for commercial and industrial zones)*

Several commenters expressed the concern that jurisdictions employed the assumption of maximum zoning yields in their calculations and that these maximums are never attained in fact. For example, the residential zone RS 7200 used by King County allows six 7,200 square foot lots per gross acre. In fact, this density is almost never achieved on the ground.

Residential Capacity. Jurisdictions began with the maximum zoning yield assumption for residential parcels but then discounted for a series of factors that explain, in the typical case, why maximum yields are seldom attained in fact. These factors -- sensitive area constraints, right-of-way, lands for other public purposes, and market factors -- are detailed in the next several lettered subparagraphs.

To take away from capacity for each of these factors and then employ yet another, general discount for less than maximum yield, would be double discounting for the same factors.

Commercial and industrial zones. Floor area ratios (FARs) are the commercial/industrial zone equivalent for the dwelling unit per acre yields of residential zoning. They specify a

ratio of improved floor space to the gross area within the parcel. For example, 100,000 square feet of floor space on a 50,000 square foot parcel would represent an FAR of 2.0.

Zoning codes specify maximum FARs for commercial and industrial zones, thereby effectively limiting the number of floors (and height) of buildings in these zones. FARs achieved on the ground typically are much smaller than the code allowed maximums, often by a factor of ten to one.

The DRTF discussed this difference between code allowed FARs and those attained in fact. Because the spread between the two was much wider than in the case of residentially zoned property, where the spread typically is two or three to one, the Forum recommended that jurisdictions use existing practice rather than local codes in estimating FARs.

This very conservative assumption was used by most jurisdictions, with Seattle being the most noteworthy exception. As shown in Table B-4 of the DSEIS, Seattle contained an estimated 46% of total commercial and industrial capacity in King County.

(b) *discounts for sensitive areas such as wetlands and steep slopes.*

As indicated in the DSEIS (pp. iii and xiii), parcel specific information on sensitive areas is not generally available to jurisdictions. In the absence of parcel specific knowledge about sensitive area constraints, the DRTF recommended to jurisdictions that they discount from 15% to 30% for sensitive area constraints that limit development on the land. Most jurisdictions used a 20% to 25% figure unless they had specific knowledge that would indicate a different figure.

The recommended range for sensitive areas discounting was based upon a study done by the King County Planning and Community Development Division in 1989. This study involved detailed analysis of a 25% random sample of formal subdivisions recorded in King County's single family urban zones between 1975 and 1987. About 15% of the density loss observed in these subdivisions was due to sensitive area constraints. This research preceded adoption of the more restrictive King County Sensitive Areas Ordinance (SAO), and a higher recommended range for discounting made allowance for this fact.

Sensitive area adjustments to land capacity estimates were made based on the regulatory structure of the early 1990s (post-King County SAO) but do not include possible effects of any future, additional regulation. This assumption is a reasonable one because it is impossible to know whether future regulations will be more or less stringent than those currently in place.

One final point should be noted here. Jurisdictions took into account sensitive area constraints that limit dwelling unit yields, whether or not they followed the specific advice of the DRTF. Seattle, for example, whose code does not forbid development on constrained lands if there is adequate mitigation, removed submerged lands from its capacity estimates. Table B-3 in the DSEIS shows that Seattle represented about 30% of all residential land capacity in King County.

(c) *discounts for right-of-way and lands for other public purposes.*

The DRTF recommended to jurisdictions that they discount vacant land capacity estimates 10% to 20% for right-of-way and for 5% to 15% for other public purposes such as parks and schools. For redevelopment estimates, a somewhat lower range (zero to 20%) was recommended for right-of-way based on the expectation that some right-of-way would already be available on site. These discounts were based on recent practice in the region.

The City of Seattle did not make specific discounts for these factors because it believed that it has adequate land for right-of-way and public purpose lands.

(d) *discount for "market" factors.*

In the summer of 1993, after conversations with residential and commercial developers and realtors, the DRTF recommended to jurisdictions that they make an additional discount beyond those noted in (b) and (c) above to allow for "market" factors. As documented in a revised draft report entitled "Adjusting Land Capacity Estimates for Market Factors," the DRTF recognized the fact that not all lands would be made available for development or redevelopment within the 20 year period used for comprehensive planning.

This market factor discount was meant to cover a wide variety of reasons for land being unavailable for development: unwillingness of property owners to sell; resistance to higher densities (NIMBYism as well as consumers not wishing to buy newer, relatively untested housing types); and lack of financial feasibility.

While "market feasibility" was explicitly placed outside the scope of the DSEIS, the land capacity section of the Land Use Chapter is an exception. It attempts to take the market into account with the market discount factor.

The market discount recommended by the DRTF, which ranged from 5% to 15% for vacant lands and from 15% to 25% for redevelopment, has been applied to the capacity estimates used in the DSEIS (Tables B-3 and B-4). As with all land capacity work, final decision on market factor discounts resides with the individual jurisdictions which may choose a market discount different from those applied in the DSEIS.

(e) *vacant land and redevelopment calculations.*

Although there were critical comments regarding both the vacant land and redevelopment estimates, in general there was more concern over the latter.

Redevelopment. Commenters expressed concern with the conclusion that redevelopment potential might represent between 40% and 50% of total development capacity, as summarized in Tables B-3 and B-4 of the DSEIS. Commenters expressed the view that market feasibility would prevent this capacity from being built in the 20-year period. Comments about industrial lands, in particular, suggested that toxic waste clean up would make redevelopment financially infeasible. Other comments suggested that the use of an appraised value approach to estimating redevelopment potential, which the DRTF recommended for commercial and industrial zoned lands, would overestimate the likelihood of redevelopment, particularly for waterfront and view parcels.

These comments are based on the professional judgment of commenters and are duly noted. Financial or market feasibility analysis was beyond the scope of the DSEIS. Officials and concerned citizens should examine the work products of the Fiscal Analysis

and Economic Development (Fis/ED) Task Force for additional analysis of redevelopment potential.

Vacant lands. Some commenters expressed concern that all vacant parcels were assumed to be developable within the 20 year period of comprehensive plans. In fact, neither the DRTF nor any jurisdiction assumed this. Jurisdictions defined vacant parcels as those with no improved value in King County Assessor records (or, for Seattle, those parcels where improved value was 0.1% or less the value of the land). Vacant land capacity was then adjusted downward, as explained above, for several factors including sensitive area constraints, right-of-way or other public purpose lands such as parks and schools, and market factors.

It is possible that some vacant parcels not specifically excluded from analysis may be undersized or otherwise unsuited for development. The market discount factor described above indirectly addresses this problem.

One commenter observed that not all unimproved property should be considered vacant, particularly if it has an economic use such as outdoor storage that supports a nearby improved parcel. This apparently is the case with some industrial lands. This type of contingency use was not addressed in the DRTF methodology. Further research would be needed to examine the feasibility and desirability of taking such as factor into account.

This same commenter pointed out an apparent inconsistency between the Seattle vacant commercial/industrial acres reported in DSEIS Table B-2 (666 acres) and a recently completed Industrial Lands survey commissioned by the City (less than 400 acres). This comparison is invalid because Table B-2 includes commercial acreage not zoned for industrial uses.

- (f) *factors not addressed: land capacity data not adjusted for insufficient capacity of key infrastructure subject to concurrency regulation under the Growth Management Act (GMA) -- roads, water, sewer, schools -- and for other factors.*

Several commenters pointed out the possible lack of infrastructure as a "missing link" in land capacity calculations. If infrastructure such as roads is not available in specific locations within the planning horizon, land capacity may not be buildable and should, therefore, not be included in land capacity figures for purposes of comprehensive planning.

The DRTF was well aware of the importance of infrastructure capacity data to any final judgment regarding the adequacy of land capacity. For this reason, it stressed the preliminary nature of its work. In addition, it recommended that jurisdictions examine land capacity as part of the capital improvement programming cycle (six years in most jurisdictions). This would allow jurisdictions to produce land capacity estimates supportable by infrastructure plans in the near term.

As pointed out in the DSEIS (pages iii, 3, and 18), data on infrastructure capacities are not generally available and will only become so as jurisdictions complete their comprehensive plan revisions. For this reason, both the DRTF and the DSEIS identify monitoring of land consumption and capacity over time as an important mitigation measure to ensure sufficient land capacity for future growth.

On a different subject, one commenter asked that land capacity numbers be adjusted for vacancy rates. This has not been done in the capacity numbers reported in DSEIS Tables B-3 or B-4, which report on land capacity as a supply-side issue. Vacancy is properly considered in the build-out scenarios for the "bookend" alternatives on pages 22 and 23 of the DSEIS, where the issue is accommodating anticipated demand for land to the supply.

- (g) *comparison with methods recommended by state and professional organizations.*

The methods recommended by the DRTF meet or exceed standards in use in the professional planning community. In a December 1993 evaluation of the work of Washington Counties planning under the Growth Management Act, researchers with 1000 Friends of Washington and the Growth Management Planning and Research Clearinghouse at the University of Washington concluded that

"King County completed one of the best land supply analyses, . . . King County's land development and capacity analysis merits emulation for its scope and comprehensiveness. . . . Providing such a detailed analysis of impacts allows planners and concerned citizens to make better decisions about the best way to plan for the future." (Growth Management or Planned Urban Sprawl? An Assessment of the Interim Urban Growth Areas adopted by Washington Counties under the Growth Management Act, University of Washington, December 1993.)

The factors considered in the DRTF methodology also conform to those recommended for consideration by the State of Washington's Growth Management Division in a guidebook entitled "Issues in Designating Urban Growth Areas (Part I): Providing Adequate Urban Area Land Supply." It is not true, as asserted by one commenter, that the DRTF failed to consider that some vacant lands would never be used nor that some vacant lands should be set aside for public purposes such as parks and schools.

LA-2 *How good was the data used to make the land capacity estimates provided in the document? Are the data still reasonably current or outdated? Are there errors in the data and, if so, how significant are they?* City of Snoqualmie, Fis/ED Task Force (Barden)(Stern), 1000 Friends of Washington, Blue, Weyerhaeuser, Elfelt, McIntosh, Seattle-King County Assoc. of Realtors, City of Renton, Immunex Corporation (Rankin), Spence, Segner, Imperatori, Burrows, Master Builders Association, Hill

Jurisdictions used the single, best comprehensive source of parcel data available for land capacity estimates: parcel data from the King County Assessor's cadastral files. The DRTF extracted and distributed this information to cities and the County in late summer 1991. In a several cases, jurisdictions used their own field survey work to do the estimates and supplemented these with Assessor parcel data.

Some commenters have expressed uneasiness with the qualification on pages 14 and 50 of the DSEIS that the data may contain inconsistencies and errors. Page 18 states further that the land capacity findings are based on initial estimates that are subject to refinement as jurisdictions move toward completion of the comprehensive plans required of them by the GMA.

Any project of the kind in question, with 34 jurisdictions working over data on nearly 600,000 parcels, is bound to have errors. Many have already been caught and corrected,

including a sizable adjustment made by the City of Seattle. Others undoubtedly will be found. Given that jurisdictions are now within two or three months of completing their plans, any remaining data errors will probably be fairly small in the overall land capacity estimate. Table 1 in the Appendix of this FSEIS contains raised land capacity data for several jurisdictions.

The land development and capacity monitoring program recommended in the DSEIS is a significant mitigation measure designed to catch any errors and limit their harmful effects. The spread of GIS (geographic information system) technology would provide a powerful impetus to monitoring efforts. GIS gives the user the power to see and catch errors in graphic, mapped form. Jurisdictions which used GIS to prepare their initial capacity estimates -- Auburn, Bellevue, Kent, and Seattle, in particular -- were able to catch errors in the data that might have otherwise been missed.

Another important limitation of the data should be highlighted here. The data used to prepare the initial estimates were based on zoning existing in 1991, prior to revisions for the new comprehensive plans. As stated on pages 16 and 17 of the DSEIS, initial land capacity estimates were

"... intended to provide policy makers and citizens with a baseline to gauge how far current zoning might take them toward the vision contained in jurisdictions' comprehensive plans required by GMA. Capacity under current zoning is distinct from (and preliminary to) the planned capacity that jurisdictions will need to provide in order to realize the vision contained in their plans."

While most jurisdictions have yet to revise zoning for their new comprehensive plans, some have done so and others have estimates for the capacity that their new plans are likely to entail. Revised figures received from jurisdictions as of April 30, 1994 are contained in the column marked "revised total capacity" in Table 1 in the Appendix. This new Table is an update of the Table B-3 which appears in the DSEIS.

It is apparent from the Table that several jurisdictions are planning a significant increase in capacity. This should allow an additional cushion on top of the capacity needed to absorb the growth they plan to accommodate in the next 20 years.

The revised land capacity estimates for comprehensive plans make it necessary to revise statements made in the Land Use chapter of the DSEIS regarding a shortage of dwelling unit capacity in the 14 Centers Alternative (DSEIS pages xiv, xvi, 14, and 29). Planned increases in zoned capacity in those jurisdictions proposing Urban Centers create added capacity more than sufficient to meet their revised growth targets for Urban Centers (see response LA-7 below for revised growth targets and comparisons with land capacity). This change is consistent with the statement made at several places in the DSEIS (see page xiv, for example) that land capacity estimates were based on data prior to revision of comprehensive plans for the GMA.

LA-3 *What is the quality of the land capacity estimates? Do the land capacity calculations presented in the DSEIS significantly overestimate or underestimate King County's ability to absorb future growth?* Fis/ED Task Force (Barden), 1000 Friends of Washington, Blue, Weyerhaeuser, Elfelt, McIntosh, Seattle-King County Assoc. of Realtors, Immunex Corporation (Rankin), Spence, Segner, Imperatori, Burrows

Most of the critical comment received on this question suggested that land capacity had been overstated in the DSEIS. One commenter suggested the reverse -- that capacity appeared to be significantly understated in the document. Some comments simply indicated that the estimates were "bad," leaving to the reviewer to infer the direction of the imputed error.

In general, the quality of the estimates produced using the DRTF methodology was good. Since the summer of 1991, jurisdictions collectively have spent thousands of hours preparing, reviewing and refining land capacity calculations. As noted above, those jurisdictions which used the mapping capabilities of a GIS to produce their estimates -- Auburn, Bellevue, Kent, and Seattle -- did a particularly thorough job, consistent with the specific assumptions and methods employed. The fact that many cities submitted refined numbers during the 1991-1993 period is a good indicator of the care that generally characterized jurisdictions' work on land capacity.

While the overall quality of the estimates is good, the residential capacity estimates are both more reliable and more complete than those for commercial and industrial lands. Similarly, estimates for vacant land are more reliable than those for redevelopment. Reliability, in the sense used here, means that greater consensus would likely be achieved by independent observers with regard to the estimates.

This is the case for several reasons. First, the residential capacity work was undertaken first by DRTF members; jurisdictions, therefore, had more time to review and check their work. Second, the assumptions used in the residential work benefited from empirical research that was undertaken by King County in 1989, as described in LU-1(b) above.

The assumptions used in the commercial/industrial work are more open to question than those used for the residential work. Most notably, the discrepancy in FARs between those allowed by the local codes and those typically built introduced an unusually large element of variance into the commercial and industrial calculations. In addition, use of the assessed value ratio for estimating redevelopment potential -- when the assessed value of improvements is equal to or less than 50% of the value of the land, the parcel was judged to be a candidate for redevelopment in the 20 year period -- is subject to a substantial degree of uncertainty.

In the former case, FARs, the DRTF recommended a conservative approach, meaning that capacity may be significantly underestimated. In the latter case, the 50% assumption was chosen as a reasonable one in the absence of more definitive information. Although it is not clear whether this assumption results in conservative or liberal estimates, critical comment received from commercial brokers suggests that it may overestimate redevelopment potential.

The difficulties in making capacity estimates for commercial and industrial uses may explain why 15 cities in Table B-4 of the DSEIS did not produce estimates for the DRTF. This fact alone (missing data) would suggest that Table B-4 underestimates commercial capacity.

Reviewers of this FSEIS are encouraged to consult the work products of the Fis/ED Task Force which address, in part, the feasibility of redevelopment in King County.

As noted earlier, one commenter argued that residential capacity calculations underestimate the true capacity of lands for future residential growth. This commenter

brings two points to bear to support his argument. First, he points out that the estimates are based on current zoning and that cities are likely to upzone (add capacity) as they implement GMA. Table 1 in the Appendix, which contains revised data, provides preliminary yet incomplete information that supports the commenter's interpretation.

On the second point, the commenter observes that the King County SAO allows some on-site transfer of density from constrained to unconstrained acreage, simply "moving density around." It must be said that the SAO applies only in unincorporated King County and, even there, not all density lost to sensitive areas can be recovered. Steep slopes, wetlands and their buffering requirements do lead to density loss, so some discounting for sensitive areas is appropriate.

LA-4 *What are the dangers of either overestimating or underestimating land capacity and what are the safeguards against these dangers?* City of Snoqualmie, Washington Natural Gas, Fis/ED Task Force (Barden), 1000 Friends of Washington, Lozier Homes, Weyerhaeuser, Elfelt, Imperatori, Lappenbusch, City of Seattle, McIntosh, Seattle-King County Assoc. of Realtors, Lowe Enterprises Northwest, Master Builders Assoc., Winbauer, Upper, Toner, Washburn

Commenters pointed out the dangers likely to follow from over or underestimation of land capacity. There also are comments on possible safeguards against these dangers.

(a) *dangers of capacity estimation.*

The principal dangers of overestimation of capacity (of estimating more capacity than is actually there) are referenced and discussed on pages 24 and 25 of the DSEIS. These dangers are the possible escalation of land prices and the "chasing" of development that would otherwise occur in King County to locations outside the County. If capacity is underestimated (there is more capacity than estimated), development may spread out in lower density patterns that may ultimately result in increased pressures for development of rural and resource lands.

Overall, commenters emphasized the dangers of over-estimation, particularly the potential for land prices to undermine affordable housing goals. Some comments expressed the belief that land capacity numbers were a key piece of the decision making that led to adoption of the Countywide Planning Policies (CPP) in July 1992. Because some land capacity numbers have since been revised, comments ask for a reexamination of the CPP with respect to the interim Urban Growth Boundary adopted at that time and subsequently ratified by the cities and King County.

While these comments and concerns are duly noted, it should be stated that decision makers were not briefed on commercial or industrial capacity prior to July 1992 because that work was still in its very early stages. They were briefed on preliminary residential capacity estimates for the Urban Area in May 1992.

(b) *safeguards against capacity estimation problems.*

Comments also have been received on proposed safeguards for the dangers of overestimation of land capacity. While most observers see the real need for an aggressive monitoring effort to track trends in land development and capacity, several commenters objected to the use of monitoring as a mitigation measure for the possible overestimation

of capacity. The general view expressed by one letter writer was that capacity is too essential to the proper functioning of growth management plans to leave it until later. "Better get it right now!" was the paraphrased consensus. If there is doubt regarding the accuracy of the capacity data, these commenters would ask for an Urban Growth Area larger than that provided in the July 1992 CPP.

One commenter wanted more detail on the possible structure, staffing, and cost of a monitoring effort. This kind of detail will be developed in the near future as part of the growth management process; it is beyond the scope of the SEIS.

Critical comments also were received on the second major safeguard for capacity overestimation cited in the DSEIS -- provision of a 25% capacity cushion on top of anticipated growth to ensure the proper functioning of markets without undue price pressures.

Some commenters correctly suggested that the location of the cushion is important in assessing its possible effects. While excess capacity in Urban Centers might not create problems (indeed, might even be desirable), excess capacity in urban fringe or rural areas could have negative effects on the sought-after growth pattern.

Other comments claim that the DSEIS did not make clear the basis for the recommended capacity cushion or why 25% would ensure proper market function. Several comments called for a much larger cushion stressing, in the words of one commenter, that

"[m]ost of the good developable land has been used and the environmental, political, neighborhood and market factors will require far greater discounts than the ones being used."

"A logical question then is: what do we have to lose if we had even a 75% cushion to cover these uncertainties? With today's concurrency requirements and impact fees, there is little to be feared from an over capacity - other than having too much affordable housing for our people."

The basis for the 25% recommended cushion is stated on pages 17 and 18 of the DSEIS. While there is nothing magical about the 25% number, the Growth Management Division recommendation and the experience of other growth management states (Florida and Oregon) provide some support for this number, particularly when accompanied by a vigorous monitoring effort to guard against possible ill effects of a too tight land supply.

Table 1 in the Appendix, which contains revised data, shows that jurisdictions are providing extra capacity cushion as they move toward adoption of comprehensive plans. The capacity shown in the Table is about 84% greater than the 20 year growth target of 216,200 households for which jurisdictions are planning.

While most comments suggested that a 25% capacity cushion is too small, one voice counseled against provision of too large a cushion. This commenter tied his criticism to the inclusion of the Bear Creek Master Plan Developments (MPDs) within the Urban Growth Area. In this view, these proposed MPDs, which are not contiguous with urban development and are presently lacking in infrastructure, are counter to the spirit of growth management.

Several reviewers stressed the importance of the land capacity decision in view of the explanatory language preceding CPP FW-8 which calls for the Urban Growth Area determination to be a permanent one.

LA-5 *What assumptions were made in developing the growth targets analyzed in the DSEIS? What process was used to develop these growth targets and how realistic are they?* Fis/ED Task Force (Barden), Metro (Bush), Weyerhaeuser, Laswell, City of Redmond, Quadrant (Fitzgerald), Washburn, League of Women Voters of King County of King County, Greater Maple Valley Area Council

Growth targets to guide growth management planning efforts in King County are being developed in two stages. Targets for generalized land use categories (e.g., Urban Centers, Rural Cities, unincorporated Rural Areas) were developed for analysis in the DSEIS. Growth targets for individual jurisdictions, which were not available when the DSEIS was scooped and prepared, were developed later and are now under review by the GMPC. The jurisdictional targets are presented in response LA-7 below, which sets them in the context of the DSEIS.

The DSEIS targets for generalized land uses for each of the four non-Magnet alternatives were developed by a team of interjurisdictional staff, reviewed, and then referred by the GMPC for environmental analysis in the DSEIS. The Magnet Alternative targets were developed subsequently by a private sector coalition of business, labor, and environmental groups with an interest in growth management planning. These were also referred to the DSEIS for analysis.

The interjurisdictional targets team considered a variety of factors in developing the targets for generalized land uses. Most important was the policy direction specified in the Countywide Policies, with their emphasis on efficient urban land use per policies LU-16 through LU-18, LU-51 and LU-54; development of Urban Centers per policies LU-29 through LU-34; and preserving rural character per policies LU-6 through LU-13. Historic growth patterns, and early indications from jurisdictions' comprehensive planning efforts, also were considered. A detailed explanation was reported to the GMPC in a June 9, 1993 memo titled "King County Household and Employment Targets."

The public policy objectives expressed in the Countywide Policies, especially the quantitative Urban Centers density criteria specified in LU-29, were the most powerful influence shaping the growth targets. For this reason, and the fact that they were developed early during interjurisdictional discussions, they have struck many commenters of the DSEIS as unrealistic. The jurisdictional growth targets presented in the response LA-7, which have benefited from lengthy discussion and review, will appear more realistic in comparison.

The growth targets specified in the DSEIS are best viewed as generalized growth scenarios which are designed to clarify differences in impacts across the alternatives. The targets which define the pre-Countywide Planning Policies and the 14 Centers Alternatives trace wide "bookends" for analysis. As one commenter observed, the differences may not be that great in reality. This does not invalidate the analysis, however.

The DSEIS analysts continue to believe in the usefulness of the approach used in the DSEIS, which has a long tradition in schools of planning and policy analysis. Use of

generalized growth scenarios can be very helpful where the analytical tools are primarily qualitative, as is the case in many programmatic environmental impact statements.

LA-6 *Why doesn't the DSEIS analyze the market feasibility, fiscal impacts, and costs of realizing the growth targets specified in the document?* Fis/ED Task Force (Barden), Imperatori, McIntosh, Seattle-King County Assoc. of Realtors, Sterling Realty Organization, Segner, Master Builders Association, Winbauer, Vance, Quadrant (Fitzgerald), Spence, Washburn, Vzyis, Harman, Greater Maple Valley Area Council

The DSEIS assumed achievement of the growth targets that were referred by the GMPC for environmental analysis. Market feasibility, fiscal impact, and cost factors were scooped out of the DSEIS (see DSEIS pages iii, x, xi, 3, and 21). By prior agreement, the Fiscal Analysis and Economic Development (Fis/ED) Task Force established by the Growth Management Planning Council is exploring these important issues. The products of the Fis/ED Task Force should be examined along with the SEIS by the reader wishing a sense of the full range of issues confronting the GMPC.

LA-7 *What are the revised growth targets for jurisdictions? Do the jurisdictions have adequate land capacity to support those targets? How do the revised targets fit within the context of the alternatives defined in the DSEIS?* Seattle-King County Assoc. of Realtors, Federal Way Water & Sewer, Lowe Enterprises Northwest, Vance, Dearborn, League of Women Voters of King County of King County, Greater Maple Valley Area Council

The revised jurisdictional growth targets presented in Table 2 in the Appendix replace those in Table 1 of the DSEIS. They were developed by an interjurisdictional staff team in fulfillment of Countywide Policies FW-1, LU-52, and LU-53 and were referred to the GMPC for consideration at its April 6, 1994 meeting.

Ranges are recommended for both net new households and jobs. The midpoints of those ranges also are provided in the Table for comparison with the countywide growth numbers that were recommended to the GMPC by the interjurisdictional staff team on April 6: 216,200 households and 349,600 jobs. Both of these numbers are viewed as planning thresholds.

Table 3 in the Appendix compares the midpoint of the proposed household growth target ranges with jurisdictions' land capacity estimates, as revised. It replaces Table 2 in the DSEIS. The countywide discounted land capacity estimate of 398,300 dwelling units exceeds the countywide growth target of 216,200 by 84%.

Revised land capacity estimates for commercial and industrially zoned lands are not presently available, so there is no revised commercial data to replace the corresponding table in the DSEIS.

With many jurisdictions still not reporting revised capacity estimates, Table 3 suggests that all but a small number of the County's 34 jurisdictions appear to have adequate discounted capacity for their proposed household growth targets. A majority appear to have excess capacity of 25% or more of targeted growth, as recommended by the Data Resources Technical Forum.

These observations provide a preliminary indication, at a countywide level, that King County's forecasted growth can be accommodated as required by provisions of the Growth Management Act (RCW 36.70A.110(2)). A definitive answer to this question will not be available until jurisdictions conclude their comprehensive plans and demonstrate that infrastructure can be provided concurrent with growth. The DSEIS points to ongoing monitoring of new development as an important mitigating measure needed to ensure the adequacy of land capacity for growth targets.

The revised growth targets in Table 2 clearly fall within the "bookends" set up in the DSEIS. The ranges in the Table place jurisdictions' growth targets between the Eight and 14 Centers Alternatives. The overall effect, in aggregate quantitative terms, of jurisdictions' "revisions" to the DSEIS targets is to bring them closer to the Eight Centers Alternative.

In the original targets based on generalized land uses (DSEIS, p. 6), 24% of net household growth and 49% of net employment growth went into Centers in the Eight Centers Alternative. In the jurisdictional targets, 27% of the net new households and 52% of net new jobs go into 14 Centers.

The reduced total growth going into 14 Centers in the jurisdictional targets -- 13% or about 28,600 of the net new households and 19% or about 67,900 of the net new employment -- goes into non-Center Urban Areas. As discussed below in response LA-10, jurisdictions report sufficient land capacity to absorb the increased growth targets in non-Center Urban Areas.

The jurisdictional growth targets in Table 2 indicate that environmental impacts will be somewhat less than stated in the DSEIS in Urban Centers and somewhat greater in non-Center Urban Areas. These revised targets suggest the need for an incremental shift in emphasis toward non-Center Urban Areas. The kinds of mitigation measures discussed in the DSEIS remain appropriate, except added effort will be needed in non-Center Urban Areas.

LA-8 *Are the household growth targets being planned for by jurisdictions sufficient to meet the 20 year minimum population growth mandated for King County by the state Office of Financial Management, pursuant to the GMA (RCW36.70A.110(2))?*
Blue, West One Bank, Weyerhaeuser, Sterling Realty Organization, Tagney-Jones

The planning threshold for households -- the midpoint for households in Table 2 in the Appendix -- is approximately 10% above the minimum number of net new households (about 195,700) that Puget Sound Regional Council (PSRC, May 1993) forecasts suggest will be needed to reach the 20 year population growth mandated for King County by the state. The Office of Financial Management (OFM) projects about 325,800 more people for King County over the 1990-2010 planning horizon (see Table 4A in the Appendix).

PSRC forecasts indicate that the net new incremental household will average about 1.66 persons. This small incremental household size will result from a continuing decline in the average size of the typical King County household, from 2.40 people in 1990 to about 2.20 in 2010. These numbers reflect demographic trends, particularly the expectation that there will be greater numbers of senior, single-parent, and one-person households over the next 20 to 30 years.

The minimum number of net new households necessary to accommodate the OFM forecast is toward the low end of the range set for household targets in Table 2 in the Appendix. By placing the OFM mandate toward the low end of the range, jurisdictions, in effect, are taking a conservative approach to ensure that plans are adequate to meet the state mandate. It also ensures that jurisdictions will have ample land capacity for new growth. Were one to use 195,700 instead of 216,200 for the household target, and comparing with the 398,300 dwelling unit capacity of Table 1, the cushion of land capacity in excess of the target would rise to 104%, more than twice the amount likely to be needed for new household growth.

LA-9 *Do Urban Centers have sufficient zoned capacity for targeted growth? Will there be adequate demand for the kinds of housing implicit in the targets for Centers? Will redevelopment in Urban Centers require the relocation of many businesses and residents? Will Centers have housing people can afford? What kinds of housing will Centers have and what will they look like in visual terms?* City of Snoqualmie, Fis/ED Task Force (Barden), 1000 Friends of Washington, Blue, West One Bank, Lozier Homes, Weyerhaeuser, Harman, Lozier Homes (Lappenbusch), City of Seattle, City of Redmond, McIntosh, Miles, Seattle-King County Assoc. of Realtors, Hedges & Roth (Roth), Sterling Realty Organization, City of Auburn, Lowe Enterprises Northwest, Master Builders Association, City of Renton, City of seat, Fis/ED Task Force (Watson), Dearborn, DeMoro, Spence

Tables 5 and 6 in the Appendix compare the growth targets for net new households and jobs with estimated land capacity figures, as revised by jurisdictions as of April 30, 1994. These Tables show that not all Centers will achieve the density criteria for households and jobs set in Countywide Planning Policy LU- 29 within a 20 year period. Instead, the jurisdictions containing these Centers -- Federal Way, Kent, Kirkland, Redmond, Renton, SeaTac, and Tukwila -- propose to phase growth into their proposed Urban Centers, achieving the policy criteria in the longer term future beyond 20 years.

As required by policy LU-29, preliminary indications are that these jurisdictions are planning sufficient zoned capacity for their Centers. As explained in response LA-7, a definitive answer to this question will not be available until jurisdictions conclude their comprehensive plans and demonstrate that infrastructure can be provided concurrent with growth. Also, the DSEIS points to ongoing monitoring of new development as an important mitigating measure needed to ensure the adequacy of land capacity for growth targets.

Many comment letters expressed substantial doubt that there would be sufficient demand for housing in Urban Centers. Commenters asserted that most households want a single family detached home, few of which will be provided in compact Urban Centers. Some have argued that all who wish to reside in Urban Centers will need to live in 20 story high-rise towers. Others have asserted that people will be discouraged by perceived inferior quality of schools and greater threats to personal safety in dense Urban Centers.

The response to these concerns is complex. Recent research sponsored by the City of Seattle and the PSRC suggests that there could be sufficient demand for well-designed higher density units in Centers, for both renter and ownership options, if one assumes several things -- most importantly, that school quality and safety concerns are addressed. Almost 30% of those surveyed in this research were in this group. In comparison, jurisdictions revised targets for Centers have about 27% of the County's 20 year growth

target going into Centers. (See Seattle Planning Department Residential Preference Study, Decision Data, Inc., December 1993).

It is true that most new development in Centers probably will require redevelopment of underutilized parcels containing existing uses. While some relocation will undoubtedly be required, there is not yet enough detail in jurisdictions' plans to quantify how much. Older, more established areas in Seattle are likely to require more of this than the emerging Centers that have been proposed in suburban areas where a greater share of new development can probably be sited on infill and partly vacant parcels. It should also be noted, however, that even Seattle can make substantial use of lands committed to parking lots without displacing any residents or very many jobs.

Many commenters expressed concern about the affordability of housing that would be constructed in Centers. While it is true that land prices per acre are higher in Urban Centers, less land per unit goes into housing in higher density areas. As a result, cost per unit could be lower in Centers. Research done in Seattle suggests that low- and mid-rise multifamily housing of up to six stories can be developed at per unit costs less than single family construction. Still, there are likely to be land price pressures in Centers and, for this reason, the DSEIS stresses the need for mitigation measures.

The photos in the Appendix are illustrative of the range of housing choices possible in Urban Centers under the Countywide Planning Policies. As suggested by the photos, high-rise tower apartments are one choice in Urban Centers. Others are clearly possible. In fact, most housing in Centers will probably be in three to six floor apartment buildings and low-rise townhouses, not high-rise towers. High-rise is not needed to reach density goals outside of Downtown Seattle and Bellevue, and even there many new buildings could be mid-rise wood frame structures of four to six stories.

These pictures respond to the general concern that the DSEIS did not help people to envision what Centers might look like at an ultimate buildout of 15 or more dwelling units per gross acre. The pictures translate into gross acres what some of this housing might look like.

One commenter rightly observed that people have trouble thinking in gross terms; builders and people generally think in terms of the net land use. Housing in Centers sits on a lot or parcel net of land for roads, streets, parks, open space, and public buildings. While this is true, gross acreage is important to planners and officials who have to be able to compare land use in Centers with land use in outlying urban areas where land subdivided for residential use almost always includes land for right-of-way needed for roads and streets; often includes land for open space or parks; and sometimes includes land for other public uses such as schools.

Density in units or people per gross acre also is essential for assessing public infrastructure and service needs. Transit planners, for example, do not seek to know what net residential densities are achieved in a given transit corridor. Rather, they want to know population densities per gross acre or per square mile along the transit corridor for purposes of estimating ridership (ignoring, for the moment, the possibility of park and ride lots along the route).

This important point is easy to appreciate if one considers a transit corridor substantially impacted by wetlands and steep slopes. In this case, densities might be quite high net of these constrained areas and still not be able to support a transit system.

The same need for density information per gross land area is needed by water, sewer, and public safety planners, by any planner, in fact, who must deal with providing service or infrastructure over linear space to serve customers.

Readers who still want to understand residential densities net of land for right-of-way, open space, and other public purpose lands can figure the net densities in the projects shown in the photos by dividing the gross density figures by .5 to .67.

LA-10 *Doesn't the DSEIS downplay urban areas outside of Centers, where targets show most future housing and a great many jobs will go? Will the urban area outside Centers have adequate land capacity to absorb the growth expected to go there in the jurisdictional growth targets?* Fis/ED Task Force (Barden), Blue, West One Bank, Lozier Homes, Weyerhaeuser, Harman, Lowe Enterprises Northwest, Suburban Cities Association, City of SeaTac, Strosahl

The DSEIS addressed urban areas outside Centers in the Land Use chapters. These areas will, indeed, receive most of the household growth in all of the five alternatives and most of the employment growth in all except the 14 Centers Alternative. The ability of these areas to accommodate the growth forecast for them is, therefore, critical to the overall success of the Countywide Policies and jurisdictions' comprehensive plans.

The household data presented in Tables 3 and 5 and Figure 1, which graphically summarizes data in the two tables, suggests that there is ample land capacity in urban areas outside of the Centers for jurisdictions household growth targets, no matter the alternative selected.

Figure 2 suggests that the capacity of employment lands outside Centers is sufficient in the aggregate to support the revised growth targets in all of the alternatives.

Again, these are preliminary indications that must await jurisdictions' comprehensive plans to ensure that land capacity is supportable by infrastructure and services.

LA-11 *Does the DSEIS show a bias in favor of the Centers alternatives in its analysis of impacts? How accurately are recent growth trends depicted in the document?* Allan, City of Snoqualmie, Metro (Bush), Imperatori, Laswell, Lemon, Seattle-King County Assoc. of Realtors, Muckleshoot Indian Tribe, City of Renton, Vance, Spence, Halstrom, Toner

(a) *Pro-Centers Bias*

Several commenters suggested that the DSEIS revealed a preference or otherwise misrepresented the Centers alternatives. This comment was most often in response to discussion of the impacts of compact development on DSEIS pages 25 and 26. Page 25 lists three adverse impacts of compact development as well as several positive ones. Each of the adverse impacts was addressed at length elsewhere in the DSEIS and so was only referenced briefly in the Land Use Chapter. These adverse effects are:

- * increased land prices

- * increased traffic congestion
- * increased public safety concerns

The statement regarding possible positive impacts from compact development which elicited the greatest critical comment was the possibility of an

"enhanced sense of shared public purpose and commitment to neighborhood values through closer community ties. This impact can be expected to follow from a commitment to higher densities when supported by good urban design and a well-conceived program of public incentives and education."

It is acknowledged that close community ties can be achieved in non-Center urban areas as well as in rural communities.

Clearly, the perception is that higher density areas are unfriendly, unsafe places. The evidence is debatable. On DSEIS page 109, the document notes that "[p]revious research has no strong conclusions about the effects of density on . . . crime." The discussion there also states that crime, particularly assault and robbery, may well increase along transit corridors.

(b) *Centers criteria and the compactness of 14 vs. Eight Centers*

One commenter specifically changed the description of Centers as stated on page 204 of the DSEIS. This description included the geographic and density criteria of Countywide Planning Policy LU-29 without specifying that the policy only requires jurisdictions to zone for, not necessarily to achieve, these densities within the 20 year planning horizon for comprehensive plans. Comment acknowledged. This distinction is made at numerous places in the Land Use chapter, however.

The same commenter also changes an implication in the Economic Development chapter to the effect that a decrease in the number of Centers, say from 14 to eight, would increase the demand for space in the smaller number of remaining Centers. Such growth may not be transferable. This comment is acknowledged. However, one might well suspect that some share of the growth in question would end up in the remaining Centers. The exact amounts cannot be known.

Another commenter changed the assertion that the 14 Centers Alternative represents a more compact development pattern than Eight Centers. However, as shown in DSEIS Table 1 on page 6 of the DSEIS, the greatest percentages of household and job growth go into Centers in the 14 Centers, not the Eight Centers Alternative. The commenter was reacting to the perceived greater difficulty high capacity transit would have serving 14 as opposed to eight Centers. The fallacy of this perception is that it ignores the fact that more growth disperses to low density areas outside high density Centers in the eight Centers Alternative, so overall the development pattern would be more difficult for transit to serve from a countywide perspective.

(c) *Single Family vs. Multifamily Trends*

Other commenters felt the DSEIS was inaccurate or misleading in its representation of growth trends data. Some suggested that the Centers Alternatives would require a radical departure from the historic single family development pattern. In fact, from 1980 through 1992, 54% of all new units receiving permits in King County were for multifamily units,

not single family (see Figure 3 in the Appendix). In comparison, the 14 centers Alternative calls for about 60% multifamily units in revised jurisdictional estimates, a modest increase over the trend.

(d) *Residential Density Trends*

Another commenter asserted that the development pattern of the early 1990s was toward greater density, not a continuation of the low density patterns of the 1980s. This point is fully addressed in the second full paragraph on page 16 of the DSEIS. While higher land prices and several other factors may lead to higher densities in the future, recent trends provide little or no evidence of this. The data on recorded single family plats from 1985 through 1992 presented in Table 7 show a continuation of overall densities of less than two dwelling units per gross acre throughout the period with the exception of 1988, when the overall density in new single family lots recorded peaked a 2.14 dwelling units per gross acre.

These data show that King County and its jurisdictions averaged slightly less than two dwelling units per gross acre in single family zones. In multifamily zones, densities achieved range from more than 100 units per gross acre in high-rise towers in the Denny Regrade to 12 to 16 per gross acre in unincorporated King County. The average is 16 to 17 per gross acre in unincorporated areas and 25 to 30 units per gross acre in the cities.

(e) *How Much Change Is Needed to Meet the Targets?*

Other commenters felt that instead of comparing growth targets with capacity under current zoning, which will have to change in many jurisdictions, that it would be more helpful to depict how much change jurisdictions would have to undergo to meet the targets. To respond to this request, Figure 4 compares residential densities per gross acre in 1993 with those that would be attained in 2013 assuming growth targets are met.

(f) *Shorelines Data*

One commenter indicated that there is an absence of data in the DSEIS on historic and cultural sites and of shoreline mileage in each land use designation. These comments are acknowledged; data are not readily available for these items.

(g) *Forest Lands Data*

One letter pointed out that about 45% of the land in King County's 1,200 square mile forest zone is federal land that may not be available for commercial use due to federal wilderness designation or other resource protection measures. Comment acknowledged.

LA-12 *Is the Urban Growth Area specified in the DSEIS sufficient to accommodate 20 years growth, as required by the GMA? Given that the Urban/Rural line specified in the Countywide Policies is intended to be permanent, how will future growth be handled beyond 20 years?* Weyerhaeuser, Federal Way Water & Sewer, Vance

The discussion in responses LA-7, LA-9 and LA-10 addresses the land capacity question as far as it can be answered prior to completion of jurisdictions' comprehensive plans.

The text of the Countywide Policies that immediately precedes FW-8 is clear that the Urban/Rural line is intended to be permanent. Future urban growth beyond 20 years would, therefore, be required to site within cities or in any remaining unincorporated area that is designated urban. With a dwindling supply of buildable vacant land, infill and redevelopment would have to account for increasing shares of future urban growth beyond 20 years.

The impact of a permanent line on land prices and on land availability for new development within the urban area will depend in large part on the degree to which the public and private sectors are able to facilitate infill and redevelopment.

In any case, a small amount of growth would still occur in unincorporated rural areas. This growth will not be supported with urban services, however.

LA-13 *How realistic are the growth targets for Manufacturing Centers used in the DSEIS? How realistic is it to assume these areas can develop as planned? Will Business and Office Park uses compete with Centers for new job growth?* Fis/ED Task Force (Barden)(Sterns), Sterling Realty Organization, Segner, Vance

The Puget Sound Regional Council forecasts an absolute decline of 3,500 jobs in manufacturing sector employment during the 20 year planning horizon in its Existing Plans alternative, down from 172,800 jobs in 1990. The small growth in Manufacturing Centers in the pre-Countywide Planning Policies (one percent, or 3,400 jobs) and No Action (two percent, or 6,800 jobs) Alternatives reflect growth in non-manufacturing job sectors (principally wholesale, communications, transportation, and utilities) that could occur within Manufacturing Centers.

The greater growth targeted for Manufacturing Centers in the three Centers Alternatives reflects a more optimistic assumption of absolute job growth in the manufacturing sector. A net increase of 17,000 jobs in Manufacturing Centers was targeted at the request of the Fis/ED Task Force, to explore the impacts of a modest amount of manufacturing job growth in the DSEIS. (See the discussion in the DSEIS on page 33 for more detail on these assumptions.)

Commenters have pointed to several factors that may frustrate plans to develop the four Manufacturing Centers that have been recommended to the GMPC -- Seattle's Ballard-Interbay and Duwamish industrial areas, Tukwila's Duwamish area, and the North Kent industrial area. The three factors mentioned most often are:

- * costs of toxic waste clean up
- * difficulties of aggregating smaller parcels
- * difficulties with relocating existing uses

These comments are acknowledged. Each of these factors would pose substantial difficulties to the development of Manufacturing Centers. Mitigation measures can be devised to deal with these difficulties, however. Public subsidies for toxic waste clean up, adoption of more flexible standards for toxic hazard abatement, use of the public powers of eminent domain for aggregation of parcels for redevelopment, and public assistance with relocation of existing uses are several examples.

Several commenters asked for clarification of DSEIS statements regarding the potential competition for jobs between low density Business/Office Park (BOP) uses and Urban Centers (DSEIS pages xvi, 33 and 34). The possibility of job competition comes, in part, from the assumption that the number of jobs in King County would be held constant under the five DSEIS alternatives. In this context, some of the jobs going into low density BOPs outside the Centers, particularly those that could site in either high density Urban Centers or lower density Manufacturing Centers, would reduce Center growth.

One commenter asserted that the problem should really be looked at differently -- BOPs did not grow over the last 20 years because business wanted to bypass Centers for cheap land on the urban fringe, but because the kind of flexible space sought was unavailable in existing Centers at the time. While this comment is acknowledged, it does not contradict the possibility that some BOP jobs might site in Centers if new development or redevelopment could make that space available.

King County and the region are likely to get only so many new jobs in the next 20 years. If jobs that could site in Centers go somewhere else, the objective of the Centers-based Countywide Policies will be undermined to some extent.

Which jobs could go into the Urban Centers? Policy LU-29 suggests that these are the office, service, and government jobs that can achieve higher densities of 50 and more per gross acre. Manufacturing Centers, on the other hand, could absorb jobs that require extensive land area (e.g., manufacturing, transportation, warehouse, and some research jobs).

LA-14 *Why is there so little analysis of Technical Review Areas in the DSEIS?*
Muckleshoot Indian Tribe

Technical Review Areas are systematically reviewed in the document. Given the Countywide, programmatic nature of the assessment, site specific analysis is not appropriate. Two facts suggest that there would be little cumulative environmental impact from the recommended changes in the five areas: (1) a net of one square mile would shift to the urban designation; and (2) much of the proposed urban designation is for the low density Urban Separator use. This would minimize adverse environmental impacts to water, air and land, including any shoreline uses.

LA-15 *The DSEIS states that rural residents are concerned about lack of fire flow due to absence of urban-level water service (p. 47). In fact, most rural residents are more concerned about the potential growth-inducing effects of urban water systems in rural areas. The SEIS should evaluate Countywide Planning Policy CO-16, which would require professional management of all rural water supply sources, including private wells. Fis/Ed Task Force (Seaman), Greater Maple Valley Area Council*

The comment on fire flow is acknowledged. In adopting the recommendations of the Rural Character Task Force (RCTF), the Growth Management Planning Council (GMPC) deleted the phrase "fire flow" from RCTF policy RU-15. The GMPC also amended policy CO-16 consistent with state law and the RCTF's intent to recognize that private wells and small public ("community") water systems are appropriate water sources for rural development and must be financially feasible at rural densities. Professional management of all new public systems is required by state law.

LA-16 *Do some or all of the Rural Character Task Force (RCTF) recommended policies apply to rural cities and their expansion areas? If so, what are the impacts? The Growth Management Act requires comprehensive plans to treat rural cities and their expansion areas as an Urban Growth Area. The Suburban Cities' alternative language for policy LU-26 should be analyzed.* City of Snoqualmie, Weyerhaeuser

None of the RCTF policies or the Countywide Planning Policies (CPPs) apply directly inside city boundaries. CPP LU-26 recognizes rural cities and their approved expansion areas as Urban Growth Areas, and sets forth criteria guiding annexations. Rural cities adopt growth targets which includes expansion areas in adopted Community plans. The Suburban Cities' language was not adopted by the GMPC.

In its public review draft Comprehensive Plan, the King County Parks, Planning and Resources Department also recognizes rural cities as Urban Growth Areas, and clearly distinguishes them from unincorporated rural town centers such as Fall City.

LA-17 *What is the impact of the RCTF's recommendation to reduce permitted rural densities to one home per 20 or 35 acres? This would be a massive downzone.* Keesling, Moss, Master Builders Association, Weyerhaeuser, McIntosh

The GMPC did not adopt this language. The King County Parks, Planning and Resources Department estimated that if it had been adopted, capacity for new dwelling units would have dropped from around 24,000-26,500 (existing zoning, plus all "new rural" downzoned to one home per five acres) to about 16,000 (assumes all rural properties downzoned to one home per 20 acres). The percentage decrease in capacity is small (40 percent) compared to the drop in permitted density (75 percent) because a relatively large inventory of existing or vested vacant lots (over 14,000) in the rural area could still be buildable under the County's rules for using legal nonconforming lots. Note: these estimates are based on zoning; actual buildability of nonconforming properties would need to be assured lot-by-lot, based on the ability to meet Health Department standards for water supply and on-site sewage disposal, which can be more difficult on smaller lots.

LA-18 *What are the impacts of the suggested rural forestry area [RCTF recommended policy RU-1]? Is there any data to support the need for a rural forestry zone? How many forest practices permits have been issued in the Rural Area, and how much timber has been removed? How many acres have been replanted? How much land would be designated? This proposal will induce many owners of rural properties enrolled in the timber tax program to log and develop them.* Moss, Weyerhaeuser

The King County Parks, Planning and Resources Department estimated that if selected portions of the rural area were downzoned in accordance with policy RU-1, the rural area's zoned capacity might drop from 24,000-26,500 to 20,000 dwelling units.

According to the King County Environmental Division, just under 8 percent of King County's commercial forest land base (defined as those lands enrolled in Forest Land Current Use Taxation under RCW 84.33), or 25,393 acres out of 324,869 acres total, is located in the Rural Area designated by the 1985 King County Comprehensive Plan.

Another 12,000 acres in the Rural Area may have significant tree cover and be in parcels large enough (10 acres or more) to have some forestry potential.

King County has consistently ranked 7th in volume of timber cut by county in Washington; 1989 volume was about 333.9 million board feet. During the period 1987-1992, timber from the Rural Area made up 22 percent of the total King County harvest as documented by Forest Practices Act (FPA) permits. In 1993 this share increased to 30 percent. During the 1987-1993 period 21 percent of the total harvest came from land belonging to small landowners. cc

According to the U.S. Forest Service, forest land parcels owned by "non-industrial private forest landowners" (NIPFs) account for between 22 and 27 percent of the forest land base in the Puget Sound region; in King County, NIPFs own 50 percent of the rural area timber land base. NIPFs occupy lower elevation lands, which are both the most productive for timber-growing and the most threatened by development pressure. (Although not perfect, there is a high correlation between NIPFs and Rural Area designations, and between large timber company ownership's and Forest Production District designations.) NIPFs supply between 20 and 30 percent of the current timber harvest in the Puget Sound region, and own 50 percent of the timber over 40 years old. In Washington state since 1988, the NIPF harvest volume has essentially replaced the loss in harvest from U.S. Forest Service lands; therefore, conversion of all of these lands to nonforestry uses would be the equivalent of permanently losing the timber harvest from federal lands.

Using the permit data cited below, the Division estimates that the Rural Area forest land base in King County could be totally converted to other uses (primarily residential) in between 21 and 32 years. The Environmental Division estimates that during the 1987-1993 period close to 1,000 FPA permits were issued in the Rural Area, involving over 15,000 acres of land. Over 300 of these permits, involving about 4,000 acres of land, were for conversion to non-forest uses.

The GMPC adopted policy RU-1 with the proviso that it not be implemented until 1995, because detailed analysis of eligible lands has not been done to see how many properties might qualify for redesignation. The capacity estimate above is a "worst case" based on downzoning of all rural lands enrolled in the state timber tax program without regard to size, location or other relevant factors (over 25,000 acres), plus selected other rural lands still being actively farmed. Also see the response to LA-17 concerning the effect of the inventory of existing vacant lots on capacity calculations.

LA-19 *The DSEIS states that proposed economic development policy ED-10 could have a significant impact on rural character if RCTF policy FW-RUa does not include resource industries as part of rural character. Weyerhaeuser's lumber mills in unincorporated King County should be considered consistent with rural character.*
Moss, Weyerhaeuser

The Department does not interpret policies ED-10 and FW-RUa as being in conflict on this issue. While rural cities or unincorporated rural towns might be the best locations for lumber mills, they are considered appropriate uses in the rural area and in the designated forest production district.

LA-20 *The DSEIS' statement on page 42 that the No Action Alternative will have adverse impacts on the rural area, given that the Sensitive Areas Ordinance, Drainage Manual, Road Adequacy Standards, Clearing and Grading Code, Shoreline Management Code and SEPA apply there, conflicts with the chapters on stormwater management, plants, animals and fish. Moss, Hedges & Roth (Nilon), Weyerhaeuser*

Comment acknowledged. The conclusion should have been stated as a comparison of relative impacts of the alternatives, with the No Action Alternative having a greater impact on the rural area only to the extent that it is assumed to make more growth in rural areas possible or likely than one of the centers alternatives.

LA-21 *Countywide Planning Policy LU-12 requires clustering on all rural parcels larger than 10 acres. What impact will this have on rural character? Greater Maple Valley Area Council, Moss, Weyerhaeuser*

The RCTF's recommended policy RU-6, with amendments adopted by the GMPC, supersedes CPP LU-12 with direction to use clustering on a case-by-case basis to achieve goals such as greater environmental protection depending on site-specific conditions. This is more consistent with current zoning and environmental regulations that apply to rural development, which allow but do not require clustering, and provide case-by-case authority to require clustering on sites with wetlands or other environmental features protected by the Sensitive Areas Ordinance.

LA-22 *How will RCTF policy RU-16 impact the ability of rural cities to provide needed infrastructure? Weyerhaeuser*

Policy RU-16 would apply to regional public facilities directly serving the public (e.g., the Kingdome or the main branch of the Seattle Public Library). It would not affect rural cities' infrastructure inside their boundaries; it would give preference over the unincorporated rural area to a rural city location for a regional facility directly serving the general public.

LA-23 *What will be the impact of RCTF policy RU-13 on permitted densities? Will rural roads be permitted to be widened to accommodate permitted densities? Weyerhaeuser*

This policy would apply to streets within subdivisions or short subdivisions. Its main impact would be to trigger a review of King County rural residential road design and construction standards to ensure that these standards are not excessive. It would have no effect on densities permitted in the rural zones (one home per 2.5, 5 or 10 acres).

LA-24 *What will be the impact of RCTF policy RU-19(b)? How many existing plat approvals and approved lots will be affected? Weyerhaeuser*

Policy RU-19b is too general to make a sweeping quantitative statement about its impacts. The Parks, Planning and Resources Department does not interpret the policy as requiring code changes that would necessarily cause pending subdivisions to lose their vested status

or existing vacant lots to become unbuildable. The Department estimated that if vested plats were not approved, and only existing vacant lots in the rural area were allowed to be built on, new dwelling capacity in the rural area would drop from about 26,500 to about 14,700. See the caveat in the response to LA-17 above regarding buildability of substandard lots.

LA-25 *The Land Use chapter says its dwelling unit capacity table does not take into account downzoning in the proposed 49 square miles of "new rural" area, which "would reduce capacity by about half". If the downzone is from 1-acre lots to 5-acre lots, capacity should be reduced by a much greater amount. A detailed analysis is needed of how much capacity will be lost to "new rural" downzoning, economic effects on land prices and tax base, plus the social effects of excluding thousands of families from these areas.* Keesling

The effect of downzoning "new rural" areas to one home per five acres is to reduce the total rural area's new dwelling unit capacity from the 29,300 shown in the capacity chart, in Table 1, to between 24,000 and 26,500. Note: this estimate is based on rural zoning being applied to all 49 square miles of "new rural" areas designated by the GMPC in 1992. Some of these areas will be redesignated back to Urban as a result of the Technical Review Area process or the 1993 update to the East Sammamish Community Plan, which means the reduction in rural capacity will be smaller; see response LA-27 for an estimate of the effects of changes entailed in the 1994 proposed Urban Growth boundary.

As noted above, the difference between the percentage reduction in area wide capacity versus zoned density for individual properties is due to the rural area's large inventory of existing vacant lots. This effect is especially strong in the "new rural" area, which has been zoned for urban densities and undergone a large amount of subdivision activity consistent with that zoning for many years, and has a very high number of lots that would be considered substandard under rural zoning.

The rural area's existing inventory of vacant lots, let alone the potential for new lots under existing zoning or various degrees of downzoning, provides more capacity than needed to accommodate a reasonable market share of the growth in households forecasted to locate in King County in the next 20 years.

LA-26 *On DSEIS page 16, the description of new rural areas should be accompanied by a map, and areas (acres and/or square miles) should be uniformly used. The second paragraph under Rural Lands and Rural Cities on page 20 should have a chart to help readers understand the numbers.* Vance

Comment acknowledged. Maps of the alternatives showing "new rural" in relation to the other designations are in the DSEIS Appendix following the policies for the Magnet Alternative. Tables 8A and 8B in the Appendix to this document show data on vacant and developed land, by parcel size, for both "new rural" and rural areas as of June, 1991 and May, 1992, respectively. This information, which was distributed to the Rural Character Task Force in 1993, was the starting point for the numbers on DSEIS page 20. The numbers on these pages will have changed due to subsequent building and subdivision activity, but are current enough to provide a reasonable overall picture of development and parcel sizes in rural King County.

LA-27 *Can DSEIS map series A-3 be corrected to show that urban designated properties in the East Sammamish Community Plan are included within the Urban Growth Area in all of the alternatives? Has the 1994 proposed boundary changed from that analyzed in the DSEIS and, if so, what is the overall environmental impact?*
Haggard, Pacific Properties, Puget Western, Weyerhaeuser

As stated in the DSEIS on page 2, the properties in question were included in the analysis of the Urban Growth Area in the DSEIS, but not reflected in map series A-3. The maps depicting the April 1994 "Proposed Urban Growth Boundary" in the Appendix of this document correct this omission.

The analysis undertaken in the DSEIS was appropriate to a broad, countywide perspective. Analysis at the level of individual properties was beyond the scope of the DSEIS.

The 1994 proposed urban growth boundary (UGB) depicted in the map in the Appendix is different from the one analyzed in the DSEIS (i.e., the line proposed in the July 1992 Countywide Policies, which was subsequently adopted by the King County Council and ratified by the cities.

As described in response IN-6, the 1994 proposed UGB contains about 12 square miles more urban designated land, including nearly five square miles proposed for future urban use in the Snoqualmie Joint Planning Area, than did the earlier UGB. In addition, an amendment to CPP framework policy FW-1 Step 5 (d) introduced but not considered by the GMPC on May 14, 1994 might expand this area by an additional 6.25 square miles. If all of these changes are adopted as proposed, an additional area of approximately 12.5 square miles would be added to the urban designations since adoption of the CPPs in 1992.

This would mean that instead of about 448 square miles in urban designation, including cities, rural city expansion areas, and unincorporated areas, there would be about 460 square miles so designated. Rural area designation, including areas rural prior to July 1992 plus those proposed for rural designation in the Countywide Planning Policies (so-called "new" rural areas), would decrease from about 330 square miles to 318 square miles. (Note: these figures are based on revised information from the King County Planning and Community Development Division GIS and, together with the proposed amendments listed in Part One, II of this Final SEIS, would replace the urban and rural area estimates on DSEIS page 18.)

These figures apply to all of the DSEIS alternatives except for the pre-Countywide Planning Policies Alternative. This last alternative would include the residual "new rural" areas depicted in the maps in the Appendix within the Urban Growth Area, encompassing an additional area of at least 27 square miles.

See the discussion in Part Two, II(A) of this FSEIS for environmental impacts of the proposed amendments.

LA-28 *There appears to be a confusion in the DSEIS regarding the 20 year period that is the object of countywide planning efforts. In most places the DSEIS uses the 1990-2010 period for analysis purposes, the period for which most data are available, while Countywide Policy amendments and comprehensive plans will be effective in 1994. This suggests the planning period for analysis should be 1994-2014.*
City of Renton

Comment acknowledged. The 1990-2010 period is used most often for analysis in the document. This was often the only time frame for which data were available. Commenter is also correct that the official 20 year growth period begins in 1994.

Jurisdictions will need to make adjustments to their land and infrastructure capacity data in their comprehensive plans to reflect current reality and the 1994-2014 planning horizon. This is one of the reasons why monitoring of land development and growth is a critical mitigation measure specified in the DSEIS.

The land capacity data in the DSEIS and still for the most part in this document (Table 1 in the Appendix) are for the situation prior to revision of plans for growth management. Table 1 has some updating as appropriate for those jurisdictions further along with the planning process; however, the intent statement on DSEIS pages 16-17 remains valid for the most part. The land capacity data are intended to provide a baseline for officials to gauge how far current zoning might take them toward the vision contained in their comprehensive plans, which are still works in progress in most jurisdictions. The analysis in the DSEIS -- specifically the comparison of land capacity with proposed growth targets -- remains valid and useful, notwithstanding the commenter's concern.

Growth targets data, also addressed by the commenter, can be adjusted forward to accommodate the 1994-2014 period, once recommended by the GMPC, adopted by the Metropolitan King County Council, and duly ratified by the jurisdictions.

LA-29 *The DSEIS should have included historical/economic comparisons of metropolitan King County with Los Angeles, San Francisco Bay Area, or other metropolitan areas. What about these policies makes it possible/certain the Puget Sound area won't develop the same way? Allan*

This type of analysis is beyond the scope of the DSEIS, and beyond the range of analysis appropriate for a nonproject EIS as set forth in WAC 197-11-442, especially for the CPPs since they are even more general than a comprehensive plan and further removed from implementation. It should be noted that several chapters make reference to strategies used in the metropolitan Portland (OR) region, either as modifications to alternatives within the "bookends" or as mitigation measures.

LA-30 *The DSEIS states that growth will be phased [sic] to Urban Centers. What are the planning, laws and permitting tools to implement this direction? Allan*

Again, the CPPs are an additional step removed from implementation. Each city that designates one or more centers will have to prepare its comprehensive plan accordingly, and follow through with implementing development regulations and financing strategies in accordance with the GMA.

LA-31 *The DSEIS implies that all development outside designated Urban Centers would be "sprawl," an undefined negative term. Higher density development outside centers is not sprawl; it could be, but it doesn't have to be. City of Snoqualmie*

Comment acknowledged. In fact, achieving a reasonably high average density of development outside centers will be crucial to achieving many of the CPPs objectives,

including affordable housing, transit-supportive land use patterns, and efficient use of urban lands.

LA-32 *The DSEIS (p. 42) incorrectly assumes that under the No Action Alternative UGAs would not be designated.* City of Snoqualmie

Comment acknowledged.

LA-33 *The DSEIS asserts, but does not demonstrate, that the least amount of growth in rural cities (presumably under the 14 Centers Alternative) equates to the least amount of adverse impacts. In fact, more adverse impacts will occur if rural cities are not allowed to develop an adequate population and tax base.* City of Snoqualmie

Comment acknowledged. It should be noted that population or employment growth may not be the only ways for a rural jurisdiction to achieve an adequate tax base. As the region begins to implement the GMA, regional financial strategies that assure the fiscal health of all jurisdictions regardless of size may need to be developed to achieve the countywide vision.

LA-34 *What adjustments should be made to policies and facility investments if non-center cities do not curtail their population and employment growth to focus growth into Urban Centers?* Fis/ED Task Force

See response to LA-31 above. Under any alternative except for 14 Centers employments, most growth will occur outside the designated Urban Centers; therefore, there should be little or no inconsistency between directing growth to Urban Centers and growth in cities without centers.

LA-35 *We question the DSEIS statement (p. 15) that all alternatives contemplate a similar level of growth in rural cities.* Fis/ED Task Force

"Similar" does not mean "same." Different alternatives would result in higher or lower amounts of growth in rural cities (see DSEIS, p. 6 Table 1, second to bottom row), but the differences are small expressed as percentages of projected countywide growth during the 20-year forecast period.

LA-36 *What funding strategies and incentives are needed to achieve Urban Center targets, and what are the impacts on the natural and built environments in centers if the targets are achieved? What happens to surrounding non-center areas and other counties if the targets for centers are not achieved?* Weyerhaeuser

The level of detail asked for here, with respect to funding land incentives is beyond the scope of the DSEIS and nonproject EISs generally. However, see response to LA-31. The impacts to Centers assuming achievements of targets are throughout the DSEIS. See response to LA-4 for dangers of non-attainment of targets.

LA-37 *Suggest the following corrections: DSEIS p. xii; South Lake Union is no longer a candidate Urban Center; that area is part of "Seattle Center." P. 36; it is misleading to say that urban development in urban centers is an adverse impact, when the goal is to promote urban development there. Individual projects in centers may have site-specific negative impacts, but at the countywide level urban development in urban centers is defined by the policies themselves as positive. P. 36; current employment*

density in Seattle CBD is 155 jobs/acre, not 123. P. 50; the DSEIS states that the pre-CPP alternative will have the least need for mitigation of the impacts of high density. But this is the alternative involving the most conversion of undeveloped and rural lands; converting these areas to suburban development will have more impacts on existing character than midrise infill or redevelopment in an Urban Center. P. 53; impacts on shorelines will be mitigated by the Shoreline Management Master Programs of other jurisdictions, not just that of King County. City of Seattle

All of these comments are acknowledged. Interpretation of impacts in Urban Centers and under the pre-CPP Alternative (DSEIS pp. 36 and 50) is debatable.

LA-38 *On page 54; the DSEIS states that development of "vacant land or open spaces" is an unavoidable impact of growth in urban areas and urban centers. "Open space" usually implies permanently protected, if not publicly owned, land set aside for parks or natural areas; does the writer mean that open space as defined here will be developed in urban areas? City of Seattle*

Comment acknowledged. The statement should not have included the phrase "open spaces," as the analysis for all alternatives excludes publicly owned parks and open spaces from developable land capacity.

LA-39 *In discussing the Eight Centers Alternative, the DSEIS states that growth "is targeted first to these centers, and next to other urbanized areas with available infrastructure capacity." CPP LU-16 states: "Within the Urban Growth Area, growth should be directed as follows: a) first, to centers and urbanized areas with available infrastructure capacity; b) second...." The DSEIS should be corrected to reflect LU-16. City of Bellevue*

Comment acknowledged.

LA-40 *On page 60 the DSEIS uses a figure of 190,000 for new households projected over 20 years, but elsewhere uses a figure of 215,000. City of Bellevue*

Comment acknowledged. At this point in the discussion the writer was estimating growth for the 18 year period, 1992-2010, not for 20 years. This is responsible for the possible confusion.

LA-41. *The City of Bellevue believes downtown Bellevue should be considered an urban center under all alternatives, not just the 8- and 14-center options. City of Bellevue*

The facts as summarized in the issue statement by the City of Bellevue are correct. The fact that Bellevue is not considered a Center in the Magnets, No Action, and pre-Countywide Planning Policies Alternatives is a product of how these alternatives were defined for the DSEIS analysis.

There is no formal designation of Centers in any of the three alternatives in question. However, some of the areas proposed for Centers designation would meet or exceed the density criteria for Centers specified in LU-29 even without the public policy implementation efforts assumed to accompany formal designation.

The DSEIS examined the Puget Sound Regional Council (PSRC) trends forecasts for Existing Plans to see which of the 14 proposed Centers would meet the LU-29 criteria for both jobs and households in 2010. The three jurisdictions which achieve both 50 jobs and 15 dwelling units per gross acre in the proposed Center in 2010 were counted as Centers in the three alternatives in question, as specified on DSEIS pages 10, 28 and 30. The City of Bellevue attains the jobs but not the households densities specified in LU-29 in the PSRC May 1993 Existing Plans forecast. It was not included as a Center in the three alternatives in question for this reason.

LA-42 *The DSEIS needs to differentiate between urban and rural service levels.*
City of Bellevue

This is beyond the scope and level of detail appropriate for the DSEIS. Service levels will be described more fully in each jurisdiction's comprehensive plan, capital spending plan and development standards. The Phase I CPPs and the Rural Character Task Force's recommended policies address this issue in a qualitative fashion. The main concern with respect to rural service areas is that facilities and services be adequate to protect basic public health and safety without creating an expectation or economic pressure for urban or suburban growth.

LA-43 *The DSEIS should estimate the amount of forest land outside the Forest Production District that will be lost through conversion to residential/golf course uses.*
Muckleshoot Indian Tribe

See response to comment LA-18. The King County Environmental Division estimates that at current rates it will take between 21 and 32 years before these lands are totally converted to nonforest uses.

LA-44 *P. 49; mitigation measure 1 (B) is inadequate and will not protect environmentally sensitive areas and will be inconsistent with Fis/ED policy ED-4.*
Muckleshoot Indian Tribe.

The reference is to possible selective modification of development standards such as building setbacks to encourage or allow full density yield on urban lands, consistent with public safety and environmental protection. The CPPs and each jurisdiction's comprehensive plan will provide policy guidance that will be expressed in development regulations. The exact balance between higher density and reduced environmental protection (if any) will be addressed then. This is a level of detail beyond the scope of the DSEIS and beyond the role of the CPPs.

LA-45 *The DSEIS selectively uses the EIS done for VISION 2020 to support the Centers Alternatives, when in fact that EIS and the work by Battelle/Databank concluded that the least-cost alternative is dispersed growth. These documents are part of the public record and should be acknowledged.* Seattle Master Builders Association

The Battelle/Databank study concluded that the costs across denser and more dispersed alternatives were not significantly different. See also LA-6. The Fis/ED Task Force marginal cost study will produce additional information regarding the comparative cost of infrastructure and services under the various DSEIS alternatives.

LA-46 *The term "rural character" should be defined.* Seattle Master Builders Association

"Rural character" is generally and qualitatively defined in policy FW-RUa recommended by the Rural Character Task Force.

LA-47 *Tables 2 and 3 merely show how households and jobs might fit into the land available under the alternatives, without examining the effects of the alternatives on the market. It is not clear how these tables relate to Tables 6 and 7..* Vance

Market effects of the alternatives were explicitly beyond the scope of the DSEIS. See response LA-6. The confusion with the sources for Tables 2 and 3 is understandable. Notes in these tables cite incorrect sources. Table 2 is based on data in Appendix Table B-3. Table 3 is based on data in Appendix Table B-4.

LA-48 *Commercial/industrial land trends described on DSEIS page 16 don't connect with earlier statements. Do they mean that commercial development has been dispersing over time, moving outward from Seattle?* Vance

Yes, that is the meaning intended by the text. This pattern has resulted in an increased rate of consumption of land for commercial and industrial uses, as described further on in the text on the same page.

LA-49 *The last sentences drop off on DSEIS pages 23 and 35. Has material been left out?* Vance

Yes. Text was mistakenly left out as follows.

DELETE PARAGRAPH BOTTOM OF PAGE 23 CONTINUING TOP OF PAGE 24 AND REPLACE WITH THE FOLLOWING:

"Compactness of New Development

All of the alternatives that derive from the CPPs, but especially the Centers Alternatives, will necessitate a more compact development pattern which uses less vacant land than has been typical of previous development. There will be more infill and redevelopment in the total mix of new development (LU-54) and a substantial share of new growth will occur within high density Urban Centers as defined in LU-29 through LU-34. How much new growth will go into Centers will vary depending upon the alternative selected, as discussed below."

DELETE PARAGRAPH FRAGMENT THAT BEGINS TOP OF PAGE 36 AND REPLACE WITH THE FOLLOWING:

"Various CPPs call for jurisdictions to mitigate possible adverse impacts associated with concentrated development. -- FW-11, FW-13, FW-14, FW-20 through FW-22, CC-1 through CC-3, LU-15 through LU-24, LU-30 through LU-34, LU-36, LU-58, and LU-62. These policies call on jurisdictions to provide superior urban design and pedestrian orientation of land uses, retain features which contribute to

overall quality of life, concentrate development near services and facilities, and provide sufficient urban services for development. These policies should mitigate the adverse impacts of concentrated development."

LA-50 *The DSEIS should discuss whether the East Sammamish plateau can support 7 to 8 homes per acre. Harman*

This question is beyond the scope of the DSEIS, which is both programmatic and countywide in nature. However, the East Sammamish Community Plan provides for an overall residential density at buildout of two to three units per gross acre in urban designated areas.

LA-51 *How are the terms "Auto friendly" and "Transit friendly" defined? Vance*

The interjurisdictional staff which developed targets for the DSEIS defined the terms as follows:

"Auto Friendly" - those areas which are urban, do not meet the transit oriented criteria, and are not served by a full range of urban services. "Transit-Friendly" - Roughly defined as those areas with transit mode split of better than 10% of peak hour trips in Seattle OR 5% or better transit mode split and non-SOV mode split of 5% or better outside Seattle.

LA-52 *What is the source for Table 6? Vance*

Annual transit ridership data are from Metro Transit.

LA-53 *The characterization of centers development as being invented as part of the Growth Management process is not correct. The 1964 and 1985 King County Comprehensive Plans are centers plans. Vance*

Comment acknowledged.

III. AFFORDABLE HOUSING

HO-1 *The SEIS's analysis of the various alternatives' impacts on affordable housing is inadequate, and needs more quantification. It needs to be related to general land capacity analysis.* King County Housing Partnership, Fiscal/ED Task Force, City of Des Moines, Lozier Homes, African-American Agenda, Seattle-King County Assoc. of Realtors, Master Builders Association, Winbauer, Watson, Claggett

The level of detail in the Affordable Housing chapter of the DSEIS is consistent with the scope set for the document, and with the level of detail of the alternatives themselves. All of the alternatives have enough zoned capacity countywide to accommodate the 20-year growth forecast for households. The differences among the alternatives relate to location, density, and mix of housing types, not amount of growth to be accommodated. Also see responses IN-2 and LA-1 through LA-4.

The issue of land capacity as it relates to affordable housing is touched on several times in the draft chapter. For example, see column 1 (bottom), page 64; column 1 (bottom), page 65; column 2, page 66. Also see the Land Use chapter (pp. 14-58), most of which is devoted to discussion of zoned residential development capacity in relation to housing markets. See also responses to comments HO-2.

HO-2 *Reexamine the SEIS's conclusion that market forces operate separate from or against public policy. The impacts of land use and housing policies on the housing market must be addressed.* King County Housing Partnership, Fis/ED Task Force, City of Pacific, Imperatori, Seattle-King County Assoc. of Realtors, Watson, Upper, Lappenbush, Spence, Kauri Investments

This is a misunderstanding of one of the DSEIS' main findings: "Market forces have significantly greater impact on housing costs and affordability than housing policies." This finding does not imply that markets and policy work in opposition, but recognizes that major shifts in national or regional market forces (e.g., interest rates, aerospace) can have a greater impact on housing supply, demand and affordability than local land use policies. Also, federal housing, monetary and taxation policies (e.g., Federal Reserve discount rate, income tax deduction for mortgage interest) affect housing markets on a greater scale than anything local governments do. This finding gives a broader perspective, but does not diminish the importance of growth management policies for location, land capacity, and development and facility standards for housing affordability. There is also no question that a very restrictive land use policy combined with a limited land supply (e.g., within a city already close to build-out), can create localized shortages or very expensive housing if market forces create a large demand for new housing.

The Portland Metropolitan Housing Rule implemented in 1982, cited on page 65 of the DSEIS (column 1, bottom) is an example of a successful land use policy specifically aimed at increasing housing affordability. The Rule, adopted under the authority of Oregon's state land use statute, required local governments in the three-county Portland metro area to adopt zoning to permit a mix of new residential construction composed of at least 50 percent multifamily and single family attached housing, and to allow development to occur at certain minimum target densities. For Portland the target was 10 dwellings per acre, for suburban cities 6-8 dwellings per acre. A 1991 study of the Housing Rule's effects from 1985 to 1989 (a period of relatively high growth for the area) by the 1000 Friends of

Oregon and the Home Builders Association of Metropolitan Portland, made the following findings:

The volume of multifamily and single family attached development increased to meet and exceed the target (54 percent of new units built).

The proportion of smaller and more affordable single family lots increased.

Development patterns showed strong demand for higher density affordable housing.

Actual development patterns were sometimes lower than zoned density.

Land use planning is necessary for affordable housing, but is not sufficient by itself. Public investment and incentives for private investment to produce or rehabilitate low-cost housing also are needed.

The discussions of land capacity cited above (HO-1) also relate land use to housing affordability. The draft states that without careful implementation and mitigation, insufficient land capacity for growth forecasts would adversely affect housing costs; for example, see pages 64, column 1 (bottom) and 65, column 1 (para. 3). Also see the summaries of studies on the effects of growth controls and other factors on housing affordability in Appendix C-4 of the DSEIS.

HO-3 *Describe/quantify housing needs for the entire population, not just low-income segments. Include cities, and state assumptions on household size, preference and ability to pay. (Several respondents disputed assumptions in the draft, saying household size is no longer shrinking or that new household need has been inflated).*
King County Housing Partnership, Fis/ED Task Force, Blue, City of Des Moines, Lozier Homes, Kauri Investments, Elfelt, West One Bank

This is beyond the scope of the DSEIS. However, see the table on pages 19-20 of the report "Affordable Housing in King County" by the Affordable Housing Task Force of the Growth Management Planning Council, issued in March, 1994. This shows the relative affordability of various housing types, ranging from a 1-bedroom rental apartment to a 2-bedroom starter home, to various households ranging from 30 percent to 115 percent of King County median income.

Also see Tables 4A and 4B in the Appendix, excerpted from the report "Washington State County Population Projections 1990-2010, 2012" issued by the Washington State Office of Financial Management (OFM) in 1992. These are the official forecasts to be used to designate the Urban Growth Area as required by the Growth Management Act, and should have been included in the DSEIS technical appendices. The Washington State Department of Community Development, Growth Management Division, has stated that the OFM forecast is to be used as a minimum to be accommodated by local governments' comprehensive plans. The forecasts shown in Table 4A, the basis for the projection of need for new housing capacity in the Land Use chapter (DSEIS pages 14-58) and for the discussion of affordable housing.

The OFM's projected breakdown of the population in the year 2010 by age groups shown in Table 4B may be used by both government and private sector planners to make judgments about the different housing types this population will need or prefer.

Although not specifically required by the Growth Management Act, King County and its cities have chosen to convert the population growth projections into equivalent new households, since zoning regulates residential density rather than population directly. For a given population forecast, assuming a larger household size results in a lower projection for growth of new households and demand for dwelling units, while assuming a smaller household size means more new dwelling units are needed to house a given population. See the discussion under response LA-8 for details.

At this writing, final growth targets have not been adopted by most cities within King County, so a detailed discussion of housing affordability city-by-city is not possible. See also the response to HO-5 below.

HO-4 *The Affordable Housing chapter should relate housing to assumptions about infrastructure. An urban property might have the right zoning, but if concurrency of services with the development isn't feasible during the 20-year forecast period, or if it is feasible only with very large mitigation fees, this will adversely affect both affordability and capacity. Existing mitigation fees [for roads, schools or parks] already price many people out of the single-family housing market. King County Housing Partnership, Weyerhaeuser, Upper, African American Agenda, Seattle-King County Assoc. of Realtors, Spence*

Comment acknowledged. The caveat about concurrency's potential effects on land capacity applies to all alternatives, including No Action. See also LA-1 for effect on the capacity analysis and IN-2 and HO-1 on level of detail. Note the DSEIS discusses mitigation fee caps or waivers in relation to lower cost housing on page 70 (column 2, para.2).

HO-5 *Refocus the analysis to compare the alternatives' impacts on housing. Discuss which alternative best promotes affordable housing, rather than just treating affordable housing programs as mitigation of the outcomes of other policies (e.g., environmental protection). Affordable housing is a basic Growth Management Act goal. King County Housing Partnership, Fis/ED Task Force*

We agree that affordable housing is a goal of the Growth Management Act that must be addressed by the Countywide Planning Policies and comprehensive plans. The proposed action is adoption of finalized Countywide Planning Policies (CPPs) intended to provide general guidance for the cities' and King County's comprehensive plans. The DSEIS generally compares the alternatives' impacts on affordable housing, but it is not possible to rank them with precision or certainty as to which alternative might best promote housing affordability.

None of the alternatives guarantee affordable housing, and all of them will require the appropriate zoning, infrastructure and programmatic actions needed to promote affordable housing. This includes higher urban residential densities both in and outside of centers, minimum density requirements, various substantive and procedural measures that could be included under the rubric of "regulatory reform", and housing assistance programs. The

emphasis on mitigation is intended to focus attention on the implementing actions needed to promote affordable housing under any alternative.

HO-6 *The centers alternatives assume a major increase in market share for multifamily vs. single-family housing. But surveys and other research indicate a significant number of people will put up with very long commutes to have a single-family house they can afford. The SEIS should discuss the possible impacts if adopting one of the centers alternatives causes housing price increases high enough to divert growth outside centers or to other counties. King County Housing Partnership, Weyerhaeuser, Harman, Blue, West One Bank, Lozier Homes, Imperatori, McIntosh, Lowe Enterprises Northwest, Nykreim, Vance*

HO-6a *The SEIS implies that market forces result in most people choosing to live in single-family homes on large lots. The SEIS should acknowledge that this market preference is clearly influenced by numerous government subsidies. Removing or reducing the subsidies, or balancing them with impact fees, may result in changes to this preference. City of Auburn, Moss*

Regarding the impacts of higher housing prices resulting in diversion of growth to other counties, the Affordable Housing chapter acknowledges this possibility (page 66, column 2, para. 5, and Technical Appendix C-4), as does the Land Use chapter (pages 24-25 under "Impacts Across County Borders"). More detailed discussion is beyond the scope of the SEIS, and would not be possible in any case until nearby counties in the region and their cities adopt their growth targets and comprehensive plans.

The single-family/multifamily market splits assumed for the centers alternatives were 45/55 percent for the Eight Centers alternative (see DSEIS page 22, column 2) and 35/65 percent for the Fourteen Centers alternative (DSEIS, page 23, column 1). These were assumptions used for modeling, not based on any policy such as the Portland Metropolitan Area Housing Rule. As shown in Table 3 in the Appendix actual multifamily market share of new residential construction in King County during the 1980s was 55 percent; this share fell in the early 1990s. Therefore, the assertion that such assumptions are based on a "major" increase in multifamily market share is debatable. A more significant departure from trends (and one that would have a greater positive effect on both land capacity within the Urban Growth Area and market-rate housing affordability) would be an increase in single-family subdivision densities outside centers.

The adopted CPP criteria for Urban Centers are intended to provide a basis for zoning and infrastructure planning. Since the DSEIS was issued, household and job targets have been prepared for each jurisdiction and each nominated Urban Center. Lower household growth is assumed for centers (about 27 percent of total countywide household growth), and the single/multifamily split is assumed to be 40/60, which is more conservative than the original assumptions. Actual growth in centers will depend on market demand as well as public policy efforts.

The City of Auburn's comment on subsidies for the single-family housing market is acknowledged, as is the comment from WestOne Bank that people will accept long commutes to live in an affordable single-family home. More research will be needed to see how removing or reducing subsidies might affect the single-family housing market.

HO-7 *The discussion of economic development would be improved by noting that housing prices affect King County's ability to attract and keep employers.* King County Housing Partnership, Lozier Homes, Winbauer

Comment acknowledged. This link was recognized by the Affordable Housing Task Force in its recommendations for policies that relate affordable housing targets for each jurisdiction in King County to local employment. See also responses EC-8.

HO-8 *There needs to be more discussion of housing affordability in relation to rural policies. Will rural areas become exclusively upper-income? Too tight an urban/rural boundary will drive up housing prices.* King County Housing Partnership, Weyerhaeuser, Lozier Homes, African American Agenda, Master Builders Association, Moss

See the responses to questions on land capacity, and to HO-1 above. In both zoned capacity and existing building lots, the proposed Rural Area has several times the capacity needed to accommodate its assumed share of countywide household growth. See the issue paper "King County Rural Areas" prepared by the Planning and Community Development Division for the Rural Character Task Force in March, 1993. Shortages of building lots in defined areas, for example Vashon Island, could create localized housing markets out of reach for the majority of King County households. Rural housing markets will be affected by how successfully growth is accommodated within the designated Urban Growth Area as well as by zoned capacity and minimum lot sizes and by other development standards for rural subdivisions.

HO-9 *If either market forces or market impacts of government actions preclude affordable housing except through subsidies, what will be the cost to taxpayers?* Allan, Fis/ED Task Force, Master Builders Association

The Affordable Housing Task Force report cited above (HO-3) recommends actions to reduce development costs, so that as much possible, affordable housing can be built by the private sector without public subsidies. It is acknowledged, however, that housing affordable to low-income households cannot be provided without subsidies. The Task Force's report indicates approximately 130,000 King County low- and moderate-income households are paying more of their income for housing than is "affordable." Over the next 20 years, about 80,000 of the expected 215,000 new households are expected to have incomes below 80 percent of median, which is the population segment most in need of affordable housing.

Local tax revenues and state and federal block grant funds earmarked for affordable housing in King County now make available about \$32 million annually for development and repair of low-income housing (this does not include federally-assisted public housing or direct rent subsidies). The City of Seattle housing levy and the King County Housing Opportunity Fund, which account for over \$14 million of this, will expire in 1995. The Task Force recommends new funding sources that should be established within three years to replace these sources, and to expand housing assistance countywide.

HO-10 *The SEIS should specifically analyze housing affordability mitigation measures.* Fis/ED Task Force, Master Builders Association, City of Kirkland

The level of detail in the discussion of mitigation is commensurate with the nature of the proposed action itself, and is consistent with the requirements of WAC-197-11-442. See, however, the report "Affordable Housing in King County" by the Affordable Housing Task Force of the King County Growth Management Planning Council, issued in March, 1994. This report provides detailed recommendations for mitigation measures including financing, inclusionary zoning, development standards and review process improvements, along with evaluations of case examples (e.g., Bellevue's 1991 inclusionary zoning ordinance).

HO-11 *Will there be affordable housing in Urban Centers or other areas of high growth under either centers alternative? Housing in the centers is likely to be expensive. An alternative to analyze would be less restrictive size/density thresholds for centers, which might make it easier to provide affordable housing within them.* Fis/ED Task Force, Blue, West One Bank, 1000 Friends of Washington, McIntosh, Immunex (Rankin)

It should be possible to produce affordable housing in Urban Centers. Multifamily development outside centers might be less expensive due to lower land costs, but should be competitive with single-family detached units. Studies for dense areas (e.g. the Denny Regrade in Seattle) indicate that centers should be able to provide a range of housing prices (Regrade rents range from \$700-\$2000, condo prices \$90,000 and up). Per-square-foot costs for high-rise construction are higher than for traditional wood-frame single-family homes, but these can be offset by higher densities and smaller units. Also, the density policies for centers can be met with low-rise and mid-rise wood-frame construction.

There is no question that the density policy for centers sets a high threshold for some suburban jurisdictions, but monitoring and the ability to make mid-course corrections must be part of the centers development strategy. The household and job growth targets being recommended for the cities acknowledge that these thresholds may not be met in all center locations during the 20-year planning period.

HO-12 *What about impacts of the alternatives on housing affordability for existing residents? Increased taxes to fund growth-induced infrastructure needs may drive existing homeowners out. In the case of centers, high-density redevelopment could eliminate existing affordable housing, displacing the poor. Market-rate housing in centers will not be affordable. Non-profit and publicly subsidized housing will be needed.* Harman, City of Des Moines, African American Agenda, Fis/ED Task Force (Stern).

Comments acknowledged. See the response to HO-11 on centers. Also see the housing assistance strategies in the Affordable Housing Task Force report cited above. See also response LA-9. Because of the extensive commercial development in Centers, the tax burden in Centers' jurisdictions does not fall entirely on the homeowner as it does in primarily residential, "bedroom" communities.

HO-13 *There is a conflict between the statements on pages 138 ("affordable housing policies could negatively impact stormwater management") and 178 ("affordable housing policies could positively impact water quality"). Development that has adverse impacts on stormwater management will adversely affect water quality. The true issue is location of development. If housing, affordable or not, is targeted to infill areas, stormwater management costs may be lower than if it is targeted to relatively undeveloped watersheds. Housing built near environmentally sensitive areas may cost more than housing farther away from such areas due to costs of mitigation. King County Department of Public Works*

Comment acknowledged. The language suggested by DPW would apply to the analysis in both locations in the DSEIS.

HO-14 *What are recent house price trends in the Central Puget Sound and how will they influence future development in King County? Vance*

The average price of home sales between 1987 and 1993 are presented for King, Pierce, and Snohomish Counties in Table 9 in the Appendix. The increases in average prices were 80%, 77%, and 55%, respectively. The faster rate of increase in King County, combined with its higher average price levels, make house purchase in Pierce and Snohomish Counties more attractive, all other things being equal, especially for moderate-income and first-time buyers who require more affordable prices to qualify for home loans.

Of course, all things are never equal. Many buyers want to live close to their places of work, and King County is the principal job center in the Central Puget Sound region. Also, many buyers may prefer the housing types, amenities, and locational attributes of King County housing above the alternatives offered in other counties.

HO-15 *Was the sharp increase in home sale prices experienced in King County between 1987 and 1990 due primarily to demand-side factors, especially job growth and immigration, or to supply-side factors, particularly government regulation? King County Housing Partnership*

Economists indicate that both land and home sale prices are affected by many factors embracing both sides of the market, demand as well as supply. While there is empirical research on both sides of the issue, the work supporting the role of demand-side factors has been documented more thoroughly with econometric tools. (See William Goolsby and others, "Future Housing Prices in King County, 1991-1993," Washington Center for Real Estate Research, College of Business and Economics, Washington State University, June 1991; and J. Thomas Black, "Explaining Metropolitan Differentials in Residential Land Prices," Urban Land, October 1990, pp. 18-22.)

Economist Steven Aos, editor of the Washington Economic Letter (Vol. 2, No. 4, October 28, 1991) summarized his research on fluctuations in Washington real estate prices between 1974 and 1991 in the following way:

"The relationship is not perfect, but migration and personal income levels account for fully 84 percent of the year-to-year variation in real estate prices."

The empirical research on this question is unanimous in concluding that it is much more difficult to quantify the possible effects of supply-side factors such as government regulation and supply constraints on land and housing prices (see Black, p. 22).

IV. TRANSPORTATION

TR-1 *What will make our transportation systems any different as the area grows?* Allan

The GMA encourages an efficient multi-modal transportation system that is based on regional priorities linked to land use (local comprehensive plans). All the alternatives analyzed are expected to increase the average vehicle occupancy in the County. Concentrated development should help reduce vehicle miles traveled, therefore increasing overall mobility. Under GMA growth will occur concurrent with adequate infrastructure to serve it.

TR-2 *The transportation element of the document is too general to allow for specific comments on possible project impacts. The location and increases of road vehicle use will vary by alternative but the discussion of impacts is only qualitative. Transportation corridor models could be accomplished on the urban center alternatives. Qualitative analysis could be done on the feasibility of existing and proposed transportation systems to meet those urban center needs. It would be worthwhile to have comparative analysis of the growth alternatives within small areas.* Allan, Gunby, Laswell, Muckleshoot Indian Tribe

The CPP's role under the GMA is to provide "a countywide framework from which local comprehensive plans are developed and adopted. Comprehensive Plans, in turn, are to be the policy basis for development regulations and capital budget decisions. The GMA doesn't specify a required level of detail for the CPP's, but it is clear that they do not need to be as detailed as comprehensive plans, and that they do not have the same relationship as comprehensive plans to implementation measures. The alternatives, information and level of detail of analysis in the DSEIS are appropriate to the level of detail of the action itself, and are consistent with the requirements for non-project EIS's set forth in WAC 197-11-442.

TR-3 *The DSEIS consistently refers to centers as being based on high capacity transit; yet, there is no meaningful analysis of the impacts of the failure to construct a regional transit plan on the viability of centers. Lack of rail is not determined to be a fatal flaw in centers' development.* Fis/Ed, McIntosh, Vance, Weyerhaeuser, Barden

See response to TR-2 regarding level of detail of the CPP's and their non-project EIS. Also, the CPP's specifically call for Centers to be served by high capacity transit. A comparison is made with non-centers alternatives and their impact relative to encouraging or discouraging transit use (see DSEIS Table 8, Mobility Matrix). The absence of rail transit is discussed on page 90 of the DSEIS as it relates to all alternatives reasonable at this time given the lack of definition of the transit system and the policy nature of the proposed alternative.

TR-4 *The DSEIS needs to clarify assumptions regarding local support for CPP policy LA-32, which seems to provide the basis for conclusion in the Transportation Demand Management (TDM) impact discussion. If urban centers are not designated, would local jurisdiction aggressively implement parking management strategies, especially assuming no significant increase in transit. Metro (Bush)*

Comment acknowledged. Current TDM programs and projects are underway in King County and local jurisdictions. TDM programs would, and are mandated to continue under state law. The mix of programs that would be pursued would vary by jurisdiction. Each jurisdiction would determine its own methods under TDM that would help reduce average vehicle occupancy. It is beyond the scope of this DSEIS and the CPP's to determine which mix of TDM programs would be implemented by which jurisdictions.

TR-5 *On DSEIS page 75, Transportation Demand Management: parking management, parking pricing, fuel pricing, etc., should be considered subelements of congestion pricing. Metro (Bush)*

Comment acknowledged.

TR-6 *On DSEIS page 76, Land Use/Transit Linkage: the heading Transit for Seattle is somewhat misleading and should be changed. The discussion under this section generally described Metro's overall operations (in terms of routes, miles and passengers). Metro has long been considered to be Seattle-centric, and such a heading simply reinforces this notion. A replacement heading could be Metro Transit Service. Metro (Bush)*

Comment acknowledged. The DSEIS heading does not relate correctly to the text that follows. Your proposed heading is more appropriate.

TR-7 *On DSEIS page 76, "Transit for Seattle", second paragraph: clarify that Community Transit operates express bus service to Bothell and the Bellevue Transit Center, and local bus service to Bothell and the Aurora Village Transit Center. Metro (Bush)*

Comment acknowledged.

TR-8 *On DSEIS page 76, "Transit for Seattle", third paragraph: should be revised to read "Approximately 10 percent of the estimated unlinked trips in Seattle...". Metro (Bush)*

Comment acknowledged.

TR-9 *On DSEIS page 79, "Linking Land Use and Transit": either this discussion should be placed under the discussion of the Regional Transit System Plan (as that is all that is discussed), or it should be broadened to reflect other relevant plans and policies, such as Vision 2020 and the GMA. Metro (Bush)*

Comment acknowledged. This information should be discussed under the RTP heading as well as the Land Use/Transit Linkage heading since it is relevant for both.

TR-10 *On DSEIS page 79, other capital facilities should be a part of the Linking Land Use and Transit discussion. Park-and-ride lots, bypass ramps, flyer stops and transit centers are a part of Metro's passenger facilities and transit link. These facilities are not for busses only or HOV only. These facilities encourage transit usage, reduce single occupant vehicle (SOV) usage, contribute to transportation demand management, encourage carpool/vanpool usage, help to reduce parking/traffic in neighborhoods, and may provide access to HOV lanes. Metro (Bush)*

Comment acknowledged.

TR-11 *On DSEIS page 80, "Transit Flyer Stops": transit flyer stops should also be a part of the Land Use/Transit Linkage discussion. Flyer stops are part of Metro's passenger facilities and transit link. Many of the same comments for capital facilities apply to flyer stops. Flyer stops speed transit travel and intercept some of the SOV traffic at various points within major travel corridors. Metro (Bush)*

Comment acknowledged.

TR-12 *On DSEIS page 80, "Park-and-Ride Lots": the short discussion on available park-and-ride stalls appears to be misplaced. The discussion would fit more appropriately within the Land Use/Transit Linkage section. Discussion of park-and-ride lots as an integral part of the Metropolitan King County transit system appears to be lacking. For example, the overall utilization rate of these lots, especially in established high density transportation corridors, should be emphasized. Considering the time required to bring new or expanded facilities on line, current demand in these areas is critical. Metro (Bush)*

Comment acknowledged.

TR-13 *On DSEIS page 81, "Bicycle": improvements needed to promote bicycle usage under all alternatives should include more frequent sweeping of outside travel lanes and shoulders, which would have corresponding impact on operational/maintenance costs. Metro (Bush)*

Comment acknowledged.

TR-14 *The first column of the Mobility Matrix, DSEIS Table 8, should read HOV's and TDM rather than Transit and TDM. The boxes in the first row across should then refer to Congestion Pricing strategies, i.e. parking management, increased transit and ridesharing. Metro (Bush)*

Comment acknowledged.

TR-15 *On DSEIS page 86, Transportation Demand Management: the discussion of TDM seems limited to implementation of parking policies and the associated anticipated effect on average vehicle occupancy. TDM can include numerous types of programs, which can have different favorable results that reducing average vehicle occupancy. Measures such as encouraging mixed-land uses, tele-commuting and providing non-motorized paths can reduce the number of vehicular trips; flex-time options can shift trips out of the peak hour, reducing peak congestion. It seems that this discussion could be expanded to more fully represent the potential impact of a range of TDM measures to work effectively under the various alternatives. Metro (Bush)*

Comment acknowledged.

TR-16 *On DSEIS page 87, "Location of Uses": Transit supportive land use patterns should also include linkages to services (i.e. medical, social, business, etc.), recreation and institutions. Metro (Bush)*

Comment acknowledged.

TR-17 *On DSEIS page 89, Eight Center vs. 14 Center impact discussion: the impact discussion states that the 14 Centers Alternative is expected to result in a greater increase in transit usage than the Eight Centers Alternative. The reason stated for this conclusion is that the 14 Centers pattern of development would be more easily served by transit. Can this statement be made so unequivocally? It seems arguments could be made to come to the opposite conclusion. Assuming a set amount of transit dollars, more centers could mean a more fractured demand for transit services, resulting in less attractive service levels and consequently, lower ridership to some of the centers. Conversely, fewer centers could mean more growth concentrated in fewer, easier to serve centers, resulting in increased transit shares to those centers. Further clarification or discussion would be useful. This comment also refers to the Main Findings section on DSEIS page 73 and Table 8 on page 84. Metro (Bush)*

For this DSEIS it is assumed adequate revenue (transit dollars) would be available to serve both the eight vs 14 Centers Alternatives. All things being equal it would be expected that a greater increase in transit usage would occur under the 14 centers alternative. Fiscal discussion was determined to be outside the scope of the SEIS. See also the response to LA-11(b).

TR-18 *On DSEIS page 97, Mitigation Measures: there is no discussion of development, expansion or enhancement of park-and-ride facilities in high use/high density corridors as a mitigating measure for the various alternatives. Such an omission ignores the importance of such facilities to the overall performance and success of the Metro transit network. Metro (Bush)*

Comment acknowledged. Also see response to TR-2 for level of detail.

TR-19 *The allocation of a significant amount of housing will result in an increased level of unbalance between jobs and housing. Census tracts with unbalanced jobs housing ratio (little employment to support increased densities) will have the effect of causing a great deal of vehicle miles traveled on state highways. WSDOT (Frank)*

Comment acknowledged. Please refer to DSEIS Table 8. Overall mobility is significantly better with concentrated development. Vehicle miles traveled is reduced under alternatives which concentrate King County's allocation of projected growth.

TR-20 *Discussion of the No-Rail Option/Variation in the DSEIS on pages 40 and 90 raise the idea of bus transit with the attribution of rail, leaving some confusion as to whether the No-Rail Option could include exclusive busways. The document should clarify whether the No-Rail Option is a transit way/busway option or only a TSM option, as described on page 11. RTA (Kirchner)*

Comment acknowledged. The No-rail option does not assume a transit-way bus system with the same attributes as rail.

TR-21 *The description of the No-Rail Option does not address the capacity constraints for buses in Seattle. The discussion of bus transit in the DSEIS should reflect these limitations and the effects they would have or the ability of an all-bus system to adequately serve the centers development pattern. RTA (Kirchner)*

Comment acknowledged.

TR-22 *The Regional Transit System Plan is a three-county plan; it does not include Kitsap County. RTA (Kirchner)*

Comment acknowledged.

TR-23 *On DSEIS page 76, the "Regional Transit System Plan" heading should be moved over to the first column, preceding the paragraph that begins "The Regional Transit System Plan released in October 1992..." The date October 1992 apparently refers to the draft plan; the final plan was released in June 1993. The entire discussion*

of the RTP should then be moved to the end of the Land Use/Transit Linkage section, as it currently falls in the midst of a discussion of existing transit service. RTA (Kirchner)

Comment acknowledged.

TR-24 *On DSEIS page 76, second column, subheading Regional Rail: this description should mention the east and south corridors (Bellevue, Tukwila, Renton, etc.). As written, it gives the impression regional rail would be limited to the City of Seattle. RTA (Kirchner)*

Comment acknowledged.

TR-25 *On DSEIS page 76, second column, subheading Bus: the subheading should be changed to "Regional Bus." RTA (Kirchner)*

Comment acknowledged.

TR-26 *On DSEIS page 76, second column, subheading Local Bus: the description should delete the word "Seattle." These services would be available in other parts of the urban area, not just Seattle. RTA (Kirchner)*

Comment acknowledged.

TR-27 *On DSEIS page 76, second column, subheading Arterial Improvements: roadway improvements, as well as traffic controls, would be used to give HOVs priority. RTA (Kirchner)*

Comment acknowledged.

TR-28 *On DSEIS page 81, second column, the discussion of telecommuting leaves the reader with the impression that 39 percent of workers could easily become dial telecommuters. The discussion should note that telecommuters generally work at home one or two days a week and commute to their workplace on other days. The discussion also does not report another conclusion to be found in Schneider's study, which is that telecommuting could account for 5 to 9 percent of vehicle miles traveled by 2020, and that vehicle miles traveled will increase significantly even if telecommuting reaches this potential level. The discussion of potential telecommuting could also be enhanced by citing evidence from studies on actual telecommuting in this region. For example, the Washington State Energy Office conducted a telecommuting demonstration project in the Puget Sound Region starting in 1990. In the demonstration project, telecommuters reduced their total commute trips by an average of 34 trips per year, or an average of less than on trip per week. One-third of the telecommuters dropped out of the demonstration before it had ended. About half of the telecommuters had to cut back on their telecommuting frequency or had to stop*

telecommuting for more than a week during the demonstration. While this does not mean that telecommuting cannot become an important element in the mix of options available to reduce commute trips, it indicates a need for caution in predicting the future potential for telecommuting. RTA (Kirchner), McIntosh

Comment acknowledged.

TR-29 *On DSEIS page 83, Table 7; page 88, Table 9, it would be useful to represent a Concentration, No HCT option in this comparison, which would represent the thrust of the no Rail Variation analyzed throughout the EIS. RTA (Kirchner)*

See comment TR-3. For this analysis it was assumed the centers would, based on the CPPs, be served by high capacity transit. An alternative that showed no HCT probably would have fallen within the range of alternatives analyzed for forecast vehicle miles travelled.

TR-30 *On DSEIS pages 90-91 the discussion of potential ridership should indicate that the RTP model used to generate these figures did not assume any ridership benefits from commute trip reduction programs. If ridership benefits from concentration in centers and from commute trip reduction programs are factored in, the rail alternative's ridership would increase by 18 percent, while TSM ridership would increase by 11 percent. Rail/TSM Alternative ridership would then be about 25 percent higher than TSM Alternative ridership, and more than double 1990 ridership. It should also be noted that the concentration assumed in the RTP model was not as great as that assumed in the 8 or 14 Centers Alternatives. Presumably the difference between Rail/TSM and TSM ridership would be even greater under these land use assumptions. RTA (Kirchner)*

Comment acknowledged.

V. INFRASTRUCTURE AND SERVICES

- 4.0 Human Services
- 5.0 Police/Fire/Emergency
- 6.0 Schools
- 7.0 Parks and Open Space
- 8.0 Water Supply
- 9.0 Stormwater
- 10.0 Sewer/Septic
- 11.0 Solid Waste
- 12.0 Utilities

IS-1 *What baseline urban and rural levels of service standards are used to determine if CPP's meet those standards. Doesn't GMA require standards for provision of urban services. The DSEIS needs to be more precise in its analysis of needed infrastructure and its concurrency requirements to accommodate growth.*
Allan, Fis/ED Task Force (Barden), Lowe Enterprises Northwest, City of Snoqualmie, Hedges & Roth (Roth), West One Bank, City of Bellevue, Federal Way Water & Sewer

With regards to level of detail please refer to responses IN-2 and TR-3. Baseline levels of service standards are not used to measure CPP's against. Different agencies within different jurisdictions deliver, plan and fund services based on specific needs. It is beyond the scope of this non-project EIS to determine baseline levels of service for each jurisdiction and the range of services provided. The CPP's are measured against their overall impact of providing services under each alternative.

IS-2 *The storm water management section does not indicate that the chemical nature of urban storm water impacts can not be mitigated by existing methods.* Allan

Comment acknowledged.

IS-3 *The sewer/septic section does not consider the increased impacts resulting from the transition from densities on septic systems to densities on sewers (i.e., increased chemical component of storm water).* Allan

Comment acknowledged.

IS-4 *The DSEIS wrongly assumes it is more costly to serve rural areas versus urban areas or areas programmed for increased density in the UGA. What are the costs of providing increased service in urban areas as a result of increased densities?*
City of Snoqualmie, Puget Power, Fis/ED Task Force(Seaman), West One Bank, King

County Urban Groundwater Purveyors, McIntosh, Weyerhaeuser, King County
Housing Partnership, Greater Maple Valley Area Council

This area is very complex as recognized on DSEIS page 24. A general conclusion is not possible. Some urban services are not provided at all in areas that don't have sufficient density to support them. It is recognized, however, that major utilities that must serve customers regardless of the area density, may have project development costs which are less in rural areas. Local governments, such as King County, find it more costly to provide services in rural areas than urban areas due to many factors mostly related to efficiency of providing and monitoring programs in more concentrated areas.

In accordance with Ordinance 10450, the Fis/Ed Task Force is conducting analysis of the CPP's fiscal impacts. This use of other analysis to supplement that contained in the DSEIS is consistent with options provided for in WAC 197-11-448 as well as Ordinance 10450.

IS-5 *It is asserted that the centers alternative would have the fewest impacts to human service delivery in rural areas. Concentrating growth in centers would reduce need for capital improvements in rural areas.* City of Snoqualmie, Fis/ED Task Force (Barden), Greater Maple Valley Area Council, Hedges & Roth (Nilon), City of Renton

Comment acknowledged. See IS-4. Concentrating growth would reduce development in rural areas. Less dense rural areas would not need increased service since overall population would not increase significantly under the centers alternatives. This does not mean that the level of service delivery per person would decrease. What it means is if rural areas didn't grow in population they wouldn't need the increase in services that would follow an increase in population.

IS-6 *Increased density in the UGA would result in the need for a major new service of water to be found to support increased population. New water sources will be needed to support economic development strategies and population increases no matter how successful we are in conserving. An uncommitted water supply renders each alternative unachievable.* City of Snoqualmie, Fis/ED Task Force (Barden), King County Urban Groundwater Purveyors, Vance

Comment acknowledged. The DSEIS should be interpreted to read major improvements to water storage, transmission and distribution would be needed to serve urban areas not rural. New water sources would need to be developed at some future point when conservation alone is not sufficient to accommodate growth. Under all alternatives a major new source of water would be necessary.

IS-7 *On DSEIS page 150, 3rd paragraph, the section reads: WNG's gas supply is brought to this area on two parallel supply lines operated by the Northwest Pipeline Corporation. We suggest deleting the words two parallel because the phrasing sounds as though the lines are far apart.* Washington Natural Gas

Comment acknowledged.

IS-8 *1985 Seattle Water Plan was used for DSEIS analysis when the 1993 plan or 1993 draft should have been used.* Fis/ED Task Force (Barden), McIntosh, Hedges & Roth (Nilon), Seattle Water Department, Vance, East King County Water Association (Kean)

Comment acknowledged. At the time the DSEIS was being prepared the Final 1993 Seattle Water Plan was not available. The conclusions using the 1993 plan vs the 1985 plan, however, would not significantly alter the impact analysis for the level of detail in this DSEIS.

IS-9 *What is the relationship between crime and higher densities. How do problems of crime in dense urban environments affect ability to create quality urban neighborhoods. What is the cost of providing greater police presence to mitigate increased crime?* Fis/ED Task Force (Barden), McIntosh, Seattle-King County Association of Realtors, Lowe Enterprises Northwest, Greater Maple Valley Area Council

For response to the cost issue see IS-4. With respect to the relationship between crime and density there seems to be a variety of points of view even within the letter responses to the DSEIS. The issue for consideration may be one of providing quality urban neighborhoods as a way to help limit/reduce crime. The data on this issue is not conclusive. See also response LA-11(a).

IS-10 *King County has long had a policy which discourages the extension of major utility infrastructure into rural areas unless a water quality or supply problem is identified. This is buttressed by code language which puts teeth in the policy. To my knowledge, there are few, if any, problems implementing the policy. I am puzzled by several references to the possible need for major improvements to the rural utility system infrastructure. King County policy translates to individual homes on a well or lots created by shortplat or small subdivisions being served by a well(s). If major infrastructure improvements are needed in rural towns or cities, the SEIS should be more precise.* East King County Regional Water Association

Comment acknowledged. See response IS-6.

IS-11 *Class A water systems contain 15 or more connections; Class B systems contain 2 to 14 connections.* East King County Regional Water Association (Kean)

Comment acknowledged.

IS-12 *In addition to conservation, individual utility exploration, and the potential of the North Fork of the Tolt River, the Seattle Water Department and the East King County Regional Water Association are exploring the possibility of locating a major regional groundwater source in the Upper Snoqualmie Valley. Application has already been made to the Department of Ecology to drill an exploratory well.*

The proposed intertie between Tacoma Water and the Seattle Water system from Pipeline 5 should be discussed as another source of water. The quantity, however will not be known until Tacoma completes its negotiations with the Muckleshoot Tribe. And, if construction is not begun on Pipeline 5 by 1996, it will put additional stress on the Seattle Water Department system as many of the South King County purveyors rely solely on groundwater. Cities such as Federal Way do not have a surplus water supply unless Pipeline 5 is built. East King County Regional Water Association (Kean)

Comment acknowledged.

IS-13 *The concentration of growth will not necessarily have much impact on the need for new water sources. It will, however have an effect on infrastructure needs. Infrastructure needs and source needs should be discussed separately. East King County Regional Water Association, Federal Way Water & Sewer, Kinder*

Comment acknowledged. The additional population growth and employment King County is allocated likely will require a major new source at some point in the future, whether that growth is concentrated or dispersed.

IS-14 *The SEIS should emphasize that a change to policy RU-16 is needed if we are to build new supplies. Public facilities for new water sources will have to be constructed where the water source is located. The Cedar River system, constructed at the turn of the century, was built in the hinterlands because that was the location of the source. I do not know of any major regional sources which could be developed in the urban areas. East King County Regional Water Association (Kean)*

Siting in urban designated areas or cities is clearly preferred under the proposed policy. RU-16 discourages but does not prohibit under all circumstances development of regional water facilities, such as a well field or supply line, in rural areas.

IS-15 *The reuse of treated wastewater should be included as a potential new source of supply. Although I do not believe it is a viable source because King County does not have many large, single users for the treated wastewater, it is part of the water supply scheme. Unlike Pierce County which has the Simpson Kraft Mill using at least 8 MGD, King County has small users by comparison. The construction of a*

distribution system would be very costly because of the lack of concentration of large water users. Use of the system would be for only 2 to 3 months out of the year. It is also unknown if treated wastewater substituted for potable water to flush the Hiram Chittendam Locks can increase our water supply. The Department of Ecology may decide the saved water is needed to enhance the instream flow in the Cedar River.
East King County Regional Water Association (Kean), Seattle Water Department

Comment acknowledged.

IS-16 *There was no discussion of groundwater as an important source of water for King County. Groundwater supplies 22 percent of the urban population. This source needs to be protected from contamination and the reduction of the urban aquifer recharge areas by inappropriate placement of high density development. The DSEIS should discuss the relative merits of methods to mitigate impacts upon recharge.*
East King County Regional Water Association (Kean), King County Urban Groundwater Purveyors, Federal Way Water & Sewer

Comment acknowledged. Groundwater plays a significant role in the overall water supply formula for both rural and urban. Concentrated development may impede aquifer recharge. Local jurisdiction comprehensive plans EIS's will provide some analysis of this issue. However, the countywide groundwater program currently underway will require local jurisdictions to take into account groundwater management plans once certified by the State Department of Ecology (DOE).

IS-17 *The DSEIS states that Centers Alternatives will have less impact on amount of storm water runoff since most of development will occur within UGA. Wouldn't stormwater production on land in UGA be the same as for land in rural if both are developed?* Fis/ED Task Force (Toner)

While the amount of stormwater would be the same, the infrastructures control costs are very different in urban and rural areas. Stormwater runoff in urban areas is controlled differently than in rural areas. Code requirements in urban areas require extensive control and conveyance systems that are not required in dispersed development in rural areas.

IS-18 *The DSEIS does not mention that Seattle manages its' own solid waste collection and disposal system. Also, both Seattle and King County are served by regional landfills located in Roosevelt, Washington and Arlington, Oregon.* Fis/ED Task Force (Toner)

Comment acknowledged.

IS-19 *On DSEIS page 13, add "East Sammamish Basin Plan (Ordinance 11111 not yet codified)" to the affected environment section.* Harman

Comment acknowledged.

IS-20 *On DSEIS page 138, add "Significant investment in capital projects will be necessary in the future to expand storm water facilities and conveyance systems" as an unavoidable impact. Harman*

Comment acknowledged.

IS-21 *On DSEIS page 153, "the hazards of EMF radiation should be added as a significant impact of upgrades to the regional transmission grid". Harman*

Comment acknowledged.

IS-22 *In the second page of Appendix 1 - Sewer/Septic, Soos Creek Water and Sewer District is listed, but there is no data showing the adoption of our comprehensive plan in Table I-1.*

The following information is provided to update the Draft SEIS:

*Date of Plan: 1987
Adoption Date: 11/8/88
Ordinance #: 8722
Amendments: 7/2/90
Ordinance #: 9514
Soos Creek Water and Sewer District*

Comment acknowledged.

IS-23 *On DSEIS page 175 a number of water quality programs are mentioned. The Ground Water Management Program of Seattle-King County Department of Public Health in cooperation with the Department of Ecology, cities, and water purveyors should be noted. This is a very important local program to protect groundwater. Local governments must adopt or amend regulations, ordinances, and/or programs in order to implement Ground Water Management Plans following certification by Ecology in accordance with WAC 173-100-120. King County Urban Water Purveyors*

Comment acknowledged.

IS-24 *It states on DSEIS page 179 that the Ground Water Management Act is administered by the Washington Department of Health. We are not aware of an Act of this title. "Ground Water Management Areas and Programs" (WAC 173-100) is administered by the Department of Ecology. It is based upon RCW 90.44.400 "Regulation of Public Groundwater". King County Urban Water Purveyors*

Comment acknowledged.

IS-25 *The Water Quality Ordinance noted on DSEIS page 132 has now been codified. The correct citation is King County Code (KCC) Chapter 8.12. Several other plans have also been codified: the Flood Hazard Reduction Plan (KCC Chapter 20.12), East Lake Sammamish Basin and Nonpoint Action Plan (KCC Chapter 20.14), and Hylebos Creek and Lower Puget Sound Basin Plan (KCC Chapter 20.14). Laswell*

Comment acknowledged.

IS-26 *Several of the ongoing SWM Division activities mentioned on DSEIS page 175 in relation to ground water quality improvement are also applicable to surface water quality improvement and can be classified as being part of the SWM Division's National Pollutant Discharge Elimination System (NPDES) permit application and compliance activities. The activities mentioned that would be included under the umbrella program of NPDES permit application and compliance are the illicit connection program, Water Quality Ordinance, Stormwater Best Management Practices (BMP) Manual, and the Hazardous Waste Management Program. Laswell*

Comment acknowledged.

IS-27 *There are several factual errors and out-of-date information in Chapter 11. The document states that the Hobart Landfill is to be closed and replaced with a transfer station; and the Cedar Falls Landfill is to be closed and replaced with drop-box facility. As stated in the Final 1992 Comprehensive Solid Waste Management Plan, the Hobart Landfill will be closed but will not be replaced by a new facility. Service will be provided by existing facilities. The Cedar Falls Landfill has been closed since 1989. Its replacement drop-box facility has also been in operation since its closure. The document also makes reference to the new Enumclaw Transfer Station as a planned improvement. However, the station has been open and operational since April 1993. Laswell*

Comment acknowledged.

IS-28 *The discussion of solid waste collection services assumes that additional growth or changes in development patterns will require some corresponding growth or realignment to the solid waste collection, transfer and disposal systems. While this approach is accurate for utility services, such as water and sewer, it is not accurate for solid waste management. The basic reasons for this are: 1) the Transfer and Disposal System are already designed to meet future needs; and, 2) the design and location of these facilities are relatively insensitive to development patterns or changes in density. Laswell*

Comment acknowledged.

IS-29 *No provisions for additional landfill space in the County should be included in the description of impacts. As discussed in the 1992 Plan, it is commonly understood that the Cedar Hills Landfill is the last landfill that will be able to be sited in the County. The role of the collection system in solid waste management is also not clearly discussed. Laswell*

Comment acknowledged..

IS-30 *DSEIS Appendix H refers to the service fee assessed by King County only and does not necessarily reflect surface water management charges assessed by other jurisdictions. The title of the table should be modified to reflect this. Laswell*

Comment acknowledged.

IS-31 *It is not clear how the affordable housing goal and transportation policy in the Magnet Alternative relates to impact on human services. City of Seattle*

The Magnet alternative proposes a growth pattern which is more dispersed than either of the Center Alternatives. The impacts on providing human services would likely be greater under the Magnet Alternative. Also see IS-4.

IS-32 *Regarding the mitigation measures for both water and sewer there has been no mention of environmental consequences of retrofitting, which may be required. In addition, there is no mention in either section regarding the transferring of conveyance systems between jurisdictions nor the need to purchase capacity which has been built into existing systems (and may have existing bonds). Hedges & Roth (Nilon)*

Comment acknowledged. Also see IS-4 and TR-3.

IS-33 *Within the Water Quality section inadequate attention was given to the fact that the Department of Ecology has five study areas within the County. Quite a bit of information regarding the location of aquifers as well as guidelines is being developed. The document gives the false impression that our drinking water is very shallow, 25 - 50 feet. In fact, most municipal wells are in excess of 200 feet in depth with only a few as shallow as 65 or 85 feet. Additional information in both the Water Quality and Water chapters should emphasize that almost 25% of the URBAN area of the County receives its drinking water from groundwater sources. The percentage for the rural area is much greater. Hedges & Roth (Nilon)*

Comment acknowledged.

IS-34 *On DSEIS page 130, under Mitigation Measures, coordinated planning efforts are listed and it is noted that King County would continue to require that local purveyor plans be consistent with other applicable plans, policies and land use controls. The GMA requires that the land use element be reassessed if probable funding falls short of meeting existing needs for public facilities. Hedges & Roth (Roth), Federal Way Water & Sewer*

Comment acknowledged. You are correct. The GMA would require King County to reassess their land use element in the event it was not served adequately by public facilities. King County will still require local service plans to be developed in compliance with local land use plans and provide capital projects to support the proposed densities.

IS-35 *Within the Stormwater Management section, under the main findings (DSEIS page 132) the last paragraph lists mitigation measures including impermeable infiltration galleries. This appears to be an impossibility, in that impermeability would tend to make infiltration impossible. Hedges & Roth (Roth), Federal Way Water & Sewer*

In some areas of the County water infiltrates too fast. In order to get a water quality benefit some swales are lined so that they allow water to infiltrate at a much slower rate in order to retain runoff for longer periods.

IS-36 *We request the DSEIS address the likely impact of Groundwater Management Plans (required pursuant to RCW 90.44) on the CPPs. Draft plans cast doubt about protecting groundwater quality and quantity under densities envisioned under current UGA boundaries. Hedges & Roth (Roth)*

See response to IS-4, TR-3 and IS-16 concerning level of detail and information analyzed in the DSEIS. Local Comprehensive Plan EIS analysis will assess impacts of development on groundwater resources in greater detail than this document. However, as stated in IS-16 groundwater management plans certified by DOE will mandate adjustments to local land use plans.

IS-37 *Under "Forecasting", on DSEIS page 126, I would suggest adding the following words (noted in bold) "How growth occurs, even if total growth remains the same within the SWD service area..." Seattle Water Department*

Comment acknowledged.

IS-38 *In the same paragraph (Forecasting), an inaccurate reference is made to the potential difference in water use depending on multifamily/single family mix. For an accurate reference, please refer to page 4-35 of the 1993 Seattle Water Supply Plan.*

The difference between a 33%/67% MF/SF mix and an 55%/45% MF/SF mix is 18 MGD. A more accurate use of this sensitivity analysis would be to refer to the specific percentage mix of MF/SF as noted above. Seattle Water Department

Comment acknowledged.

IS-39 *Under Significant Impacts in the DSEIS water supply chapter I would suggest the following change: "Seattle's recently adopted 1993 Water Supply Plan..."*
Seattle Water Department

Comment acknowledged. See response IS-8.

IS-40 *The second paragraph on page 120 is incorrect. King County does not have plentiful fish and wildlife compared to 10 or 100 years ago. If this were the case, then there would not be: 1 salmon stock (White River spring Chinook) in critical condition, 7 salmon stocks in a depressed condition, various wildlife species on the state's Threatened Endangered list that inhabit portions of King County. Muckleshoot Indian Tribe*

Comment acknowledged.

IS-41 *The impacts of the alternatives should be considered in terms of the demand increases that cause reductions in baseflows which adversely affect beneficial uses as defined under the Clean Water Act. Because this chapter is missing in this analysis, it does not address the impacts to the affected environment, or the river and groundwater systems that contribute to public water supplies. Muckleshoot Indian Tribe*

The level of detail and analysis within the DSEIS would not provide accurate impact analysis for this issue. This analysis is beyond the scope of this non-project DSEIS. See IS-4, TR-3.

IS-42 *On DSEIS page 116, the SEIS states that Policy CO-14 of the Countywide Planning Policies (CPP) would mitigate the impacts of growth on schools by allowing existing schools to expand, thereby decreasing the need for new schools. In fact, Policy CO-14 was drafted with the explicit intent of authorizing new schools to be built in the rural area. We agree that Policy CO-14 would mitigate the impacts of growth on schools, but for a different reason: The Policy, together with King County Ordinance No. 10525, would permit schools to be built on sites already owned by districts and on other suitable sites in the rural area. King County School Coalition*

Comment acknowledged. We concur with your assessment of the intent of Policy CO-14. It would serve to mitigate the impact of growth on schools for the reasons you stated.

IS-43 *The SEIS states that the process established in Policy S-1 for the siting of public capital facilities could have a significant impact on schools. However, this Policy expressly addresses the siting of higher educational facilities such as universities and their branch campuses, as well as other facilities of a statewide or regional nature, including airports and landfills. (See text on page 44 of the CPP) The siting of primary and secondary schools are not within the scope of this Policy, and the paragraph discussing the impacts of Policy S-1 on schools should be deleted. King County School Coalition*

Comment acknowledged.

IS-44 *The information in DSEIS Table F-1 of the Appendix should be updated to reflect recent Council action. The King County adopted Ordinance No. 10982, authorizing impacts fees for the Kent School District No. 415, on August 27, 1993, and it became effective on September 6, 1993. The Council adopted the impact fee implementing ordinance for the Lake Washington School District No. 414, Ordinance 10790, on April 21, 1993, and it became effective on May 1, 1993. Finally, the Council adopted Ordinance No. 11148, authorizing fees for the Northshore School District No. 417, on December 9, 1993, and it became effective on December 19, 1993. King County School Coalition*

Comment acknowledged.

IS-45 *The DSEIS should clarify completion of Parks Recreation and Open Space Plan. DSEIS page 119, paragraph #1, states Plan complete. Paragraphs 2 and 4 state Plan not complete. City of Renton*

The Parks Recreation and Open Space Plan is still in draft form.

VI. NATURAL SYSTEMS

- 13.0 Sensitive Areas/Resource Lands
- 14.0 Air Quality
- 15.0 Water Quality 4
- 16.0 Plants, Fish, Animals
- 17.0 Noise

NS-1 *If a quantitative analysis of potential impacts of future growth under each alternative is not completed at this time, when will it be completed?* Muckleshoot Indian Tribe

The DSEIS is only part of a phased approach to the environmental review of the response of King County and its cities to the Growth Management Act (GMA). It is consistent with the characteristics of the proposed action and the requirements for nonproject EISs set forth in WAC 197-11-442.

A detailed quantitative environmental analysis must await the environmental review of the individual comprehensive plans (due July 1994). We can expect more thorough analysis of site-specific data from state, federal and local sources will be included in these individual comprehensive plans.

NS-2 *Shouldn't there be acknowledgment of the mutual dependence between the area's economic development and its environmental quality? Would regulatory reform and incentives support better standards of environmental and community protection?* Conversation about the Future

The relationship between economic development and environmental quality is acknowledged throughout the DSEIS and the many documents associated with it. The planning goals of the GMA used to guide the development of the comprehensive plans refer to the need to "encourage economic development throughout the state that is consistent with adopted comprehensive plans ... within the capacities of the state's natural resources, public services and public facilities", "maintain and encourage natural resource-based industries, including productive timber, agricultural and fisheries industries" and "protect the environment and enhance the state's high quality of life, including air and water quality". Several framework policies in the CPPs (i.e., FW-3, 27, 28, 29) explicitly recognize this balance.

CPP Policy ED-1 calling for the GMPC to develop Economic Development policies requests that those new policies "protect the natural environment as a key economic value in this region". And this point is reiterated in the new Policy ED-4 proposed by the Fis/ED Task Force.

The issue of regulatory reform is discussed in the new Policy ED-4 and, more significantly, in new ED-14 through ED-17, as proposed by the Fis/ED Task Force.

While the use of incentives is implicit in new Policy ED-3 and others, it is clearly the basis for the Magnet Alternative.

The Economic Development chapter of the DSEIS concludes that, while the CPP policies and most of the alternatives are truly growth management policies, the Magnet Alternative and the policies developed by the Fis/ED Task Force are more growth enhancing. They could lead to more jobs, economic growth and development than are assumed in the rest of the DSEIS. The consequences of this enhanced economic activity in terms of the number of new workplaces, additional work trips and infrastructure needs and its effect on environmental protection and community stability are not discussed in the DSEIS.

NS-3 *Shouldn't the federally recognized Tribes be consulted during the implementation of the CPPs in order to promote the coordination of land use planning and the management of fish and wildlife resources?* Muckleshoot Indian Tribe

The role of the federally recognized Tribes in regional land use and environmental planning was recognized in the development and implementation of the CPPs.

The critical areas and resource lands policies found in the CPPs are based on policies developed by a Critical Areas & Resource Lands Technical Forum during the year preceding the adoption of the Phase 1 CPPs. This group included environmental and planning staff from most King County jurisdictions, several state and federal agencies, the federally recognized Tribes and the private sector.

CPP CA-10 calls for jurisdictions to coordinate land use planning and management of fish and wildlife resources with affected state agencies and the federally recognized Tribes. For unincorporated King County there was a thorough public process for the development of the comprehensive plan policies for the natural environment and natural resource lands chapters. Various interested groups, including representatives from the federally recognized Tribes, participated in pre-scoping meetings and the review of two drafts of these chapters. The draft public review version of this entire document is currently available for comment and refinement.

Although the report on environmental protection activities (in particular, the consistency and compatibility of regulations and designations, cumulative impacts and education programs) required by CPP CA-15 had a target completion date of December 1993, this work was not part of the workplan for Phase 2 of the Countywide Planning Policies. It is expected to be part of the 1995 CPP workplan. This report is to be conducted by a broad-based technical committee, including representatives of the county, the cities, the federally recognized Tribes, business community, environmental community, public utilities, special districts, and interested citizens.

In the course of preparing the DSEIS, the King County Planning and Community Development Division held a series of four public meetings between January 27 and February 4, 1993 to receive public input on the scope of the SEIS for the CPP. These meetings were widely advertised and subsequently attended by over 170 individuals. They provided ample opportunity for comment.

NS-4 *Shouldn't salmonid habitat be considered on the basis of individual watersheds and the entire Puget Sound basin rather than by political boundaries?* Muckleshoot Indian Tribe

Consistency of critical areas legislation among jurisdictions was a major goal of Critical Area and Resource Lands Technical Forum and its proposals for the Phase 1 CPP. This is why the Phase 1 CPPs contain policies, such as, FW-3, FW-4, CA-1, CA-2, CA-3, CA-6, CA-8, CA-9, CA-10, CA-11, CA-14 and CA-15.

The joint review of comprehensive plans and the technical committee created by CPP CA-15 are to look at how successfully the jurisdictional environmental policies transcend political boundaries and respect natural watersheds and basins.

Of particular importance is CCP CA-14. It requires jurisdictions to implement the Puget Sound Water Quality Management Plan. This plan is in part a product of the Puget Sound Estuary Program, which is co-managed by the U. S. Environmental Protection Agency, the Puget Sound Water Quality Authority in cooperation with federally recognized Indian tribes of Western Washington, and the Washington Department of Ecology.

NS-5 *Shouldn't watersheds be used as natural urban/rural separators?* Beaver Lake Community Club

Several CPPs (LU-7, LU-14(e,f,g), LU-15, LU-26(d), FW-22, CC-6(a)) refer to the use of watersheds and other topological features as natural separators between urban and rural areas. Of direct relevance to Beaver Lake is CPP CC-8. It states that "[t]he water bodies and rivers of Puget Sound region form ... important element[s] of the open space systems". While these principles are clearly included in the CPPs the actual location of the urban growth area (which forms the urban/rural line) is the responsibility of the Growth Management Planning Council (GMPC) and not an issue for the DSEIS.

In the recent public review draft King County Comprehensive Plan, Beaver Lake is fully contained in an area designated as Urban Growth Area Reserve.

NS-6 *How are the cumulative impacts of these policies on sensitive areas, water quality, fish habitat, and managed, threatened and endangered species to be addressed?* Allan, Muckleshoot Indian Tribe

The DSEIS's response to these issues is consistent with the characteristics of the proposed action and the requirements for nonproject EISs set forth in WAC 197-11-442.

The CPPs (Policy CA-15) recognized that cumulative impacts are an important regional concern by calling for a separate document that would consider them along with the consistency and compatibility of environmental regulations and standards and education programs in the various jurisdictions. This policy has however not yet been

implemented. Hopefully these issues will be considered in the joint review of the comprehensive plans of the jurisdictions.

NS-7 *How does King County's Sensitive Areas Ordinance satisfy the requirements of the Growth Management Act?* King County Dept. of Public Works (Laswell), Muckleshoot Indian Tribe

The GMA (RCW 36.70A) required each county and each city within the county to:

1) Classify and designate natural resource lands (including agricultural and forest lands and mineral sites) and critical areas (including wetlands, areas with a critical recharging effect on aquifers used for potable water, fish and wildlife habitat conservation areas, frequency flooded areas and geologically hazardous areas) (RCW 36.70A.030, 050,170); and

2) Adopt interim development regulations (RCW 36.70A.060)

by September 1, 1991 (later extended to March 1,1992) before the goals, objectives and policies of the comprehensive plans were finalized. These actions were intended to shape the content of the comprehensive plans as well as conserve the natural resource lands and protect critical areas while the comprehensive plans were being developed.

King County chose to satisfy these requirements for unincorporated King County by adopting a motion (No. 8496) that stated that its 1990 Sensitive Areas Ordinance (No. 9614, codified as section 21.54 of the old King County Code) and its authority under the State Environmental Policy Act (SEPA) and its 1985 Comprehensive Plan provided all the interim protections required. No new legislation was enacted in response to the interim critical areas and resource lands provisions of the GMA. The validity of this approach was successfully challenged in a recent ruling of the Central Puget Sound Growth Hearing Board.

Chapter 13 of the DSEIS should have included the following chronology: The actual development of King County's Sensitive Areas Ordinance (SAO) preceded the adoption of the GMA; it was an implementation of policies in the 1985 King County Comprehensive Plan and not a direct response to the GMA. It was used subsequently however to satisfy the interim provisions for wetlands, frequency flooded areas and geologically hazardous areas. The King County SAO does not explicitly consider fish and wildlife habitat areas or aquifer recharge areas (i.e., areas with a critical recharging effect on aquifers used for potable water). However, existing Comprehensive Plan policies and regulations are used in conjunction with SEPA to condition development permits related to these critical areas. The natural resource lands are protected through zoning and unclassified use permits associated with the implementation of the 1985 King County Comprehensive Plan.

The King County SAO is also only applicable in the unincorporated portion of King County. The cities within King County have adopted their own legislation for both critical areas and natural resource lands as summarized in Table J-1 in Appendix J of the DSEIS.

NS-8 *There should be an economic analysis of the differences between the 1987 and 1989 federal wetland delineation manuals.* Keesling

The choice of wetland delineation methodology has been a controversial issue for many years. The differences between the 1987 and 1989 manuals, jointly developed by several federal agencies, remain important environmental and economic questions. The National Academy of Sciences is undertaking yet another study of this issue.

The State is currently involved in developing a Statewide Wetland Integration Strategy that is expected to discuss the differences between the two manuals. Currently the Department of Ecology uses the 1987 Manual when reviewing Corps of Engineers permits and the 1989 Manual when reviewing permits associated with the Shoreline Management Act. The actual practical differences are quite small; the 1987 Manual is just less precise about which delineation methodology to use than the 1989 Manual.

In an effort to employ the most scientifically defensible approach and to support its consistent application across the county, CPP CA-1 adopted the 1989 Federal Manual For Identifying and Delineating Jurisdictional Wetlands as a minimum standard for all jurisdictions. The economic analysis of the implications of these differences is beyond the scope of this DSEIS.

NS-9 *How are critical fish and wildlife habitat areas to be protected?*
Muckleshoot Indian Tribe

While critical fish and wildlife habitat areas in unincorporated King County are not directly designated or regulated by the SAO (see response NS-7), there are a number of other important ways that this protection may be provided. Site planning and site management plans may be developed during development reviews. The SEPA wildlife study guidelines can be used during a SEPA review. Incentives programs, such as the Public Benefit Rating System, can reward landowners for habitat enhancement and restoration projects. These interim measures will be significantly enhanced by the policy support and direction given in public review draft King County Comprehensive Plan. It calls for the conservation and enhancement of terrestrial and aquatic habitats, the maintenance of the existing diversity of species and habitats in the County, and the establishment of interjurisdictional habitat networks.

The Countywide Planning Policies CA-6 to CA-10 and their realization in the comprehensive plans of the local jurisdictions are major political commitments to the protection of the critical fish and wildlife habitat of the County.

NS-10 *The importance of protecting ground water from contamination should be emphasized. There should be discussion of the role of aquifers in providing other environmental values, such as base flows in streams.* Fis/ED Task Force (Barden), City of Bellevue, Federal Way Water & Sewer, Conversations about the Future

The public review draft King County Comprehensive Plan claims that groundwater provides 30 to 40 percent of the water for private, municipal, industrial and agricultural uses countywide. The DSEIS's comments on ground water (pages 125,

127, and, most significantly, 175 and 179) should be augmented by a discussion of the relationship between ground water and aquifers and the broader importance of ground water resources. It should be made clear that the cost of protecting a source of ground water from irreversible contamination is considerably less than remediation or developing alternative sources.

As explained in the Technical Appendix C of the public review draft King County Comprehensive Plan, aquifers are saturated underground soil or rock formations that can provide ground water for drinking, irrigation and landscaping in economically feasible quantities. When there is hydraulic continuity with surface waters, ground water resources also provide a base flow for lakes and streams during low rainfall and support for fish and wildlife habitat and recreation. Aquifer recharge occurs when rain, stormwater runoff, surface water or other sources replenishes the aquifer. The quantity and quality of this water will depend on features of both the natural and built environments (including soil type, topography, rainfall, and amounts of deforestation and impervious surfaces).

The GMA considers "areas with a critical recharging effect on aquifers used for potable water" as critical areas (RCW 36.70A.030(5)) and subject to effective environmental protection. A section on critical aquifer recharge areas should have been included in the chapter on sensitive areas and resource lands.

The importance of protecting ground water is reflected in CPP CA - 5 and Policies RU-8 and RU-10 from the Rural Character Task Force as well as policies in the Natural Environment chapter of the public review draft King County Comprehensive Plan and other comprehensive plans.

The Seattle-King County Health Department is the designated lead agency, responsible for coordinating the activities necessary for ground water protection programs. To satisfy the interim requirements of the GMA, the Health Department provided the SEPA Section of the King County Environmental Division with a list of soils that may allow rapid recharge to ground water. In conjunction with the ground water provisions of the King County Comprehensive Plan and associated community, basin and non-point plans, a SEPA review may condition a development proposal when the site's soil types match the possible recharge area soil type list. The Health Department continues to work with advisory committees on more comprehensive Ground Water Management Plans in five areas of King County - Redmond, Issaquah, East King County, South King County and Vachon. It is also continuing its efforts to map thoroughly the sensitive aquifer recharge areas (that include the critical aquifer recharge areas) and to develop land use conditions for wellhead protection areas.

NS-11 *What is the status of the Federal Way area aquifers and the aquifer recharge area under Issaquah?* Federal Way Water & Sewer

These detailed technical questions should be addressed in the Ground Water Management Plans being developed by the Seattle-King County Health Department and its advisory committees. They are not appropriate in a programmatic environmental impact statement (WAC 197-11-442).

NS-12 *Shouldn't Resource Lands have an explicit designation of their own, independent of Rural Lands?* King County Dept. of Development & Environmental Services

The DSEIS has a limited discussion of Resource Lands (DSEIS p. 20ff, 41ff, 52ff, 54). While this discussion is contained in the sections on Rural Lands and Rural Cities, it is clear on p. 20 of the DSEIS that unincorporated King County has designated Resource Lands distinct from Rural Areas.

The distinction is explicit in several of the CPPs. The policies, FW-5, FW-6 and FW-8, all include the sentence, " Urban Growth Areas, Rural Areas and Resource Lands shall be designated and the necessary implementing regulations adopted."

The public review draft King County Comprehensive Plan contains a separate chapter on Natural Resource Lands. A number of cities, especially rural cities and those near the urban/rural line, may include resource lands within their boundaries, which will need to be addressed in their comprehensive plans.

NS-13 *Shouldn't the designation of mineral resource lands be discussed in the DSEIS?* King County Dept. of Development & Environmental Services

The GMA and the CPPs require the designation of agricultural, forest and mineral resource lands by jurisdictions. The designation of mineral resource lands is not an issue for the DSEIS but rather for the comprehensive plans of the individual jurisdictions. While many jurisdictions already have interim designations and regulations as required by RCW 36.70A.030, 050, 060, 170, final designations and regulations are expected by the end of 1994.

NS-14 *Shouldn't there be a discussion of a twenty year supply of mineral lands?* King County Dept. of Development & Environmental Services

While the idea of an analysis of future requirements for mineral lands was suggested in the State Department of Natural Resources GMA Guidelines, it is not a requirement under the GMA. Since this issue was not addressed in the CPPs, it is not a topic for the DSEIS. It is more appropriately addressed by the individual jurisdictions.

NS-15 *Isn't the DSEIS wrong when it says that increased land use density may cause fixed air pollution sources (such as lumber mills) to locate close to conflicting land uses (such as residences)?* City of Seattle

Comment acknowledged.

Relevant resource-based industries policies include, for example, CPP LU-1 through LU-5, the LU-9 rural character policies (i.e., FW-RUa, RU-1, 2, 5, 6, 9, 17, 19 from the Rural Character Task Force), LU-10, LU-12, and the ED-1 economic development policies (i.e., ED-10 from the Fis/ED Task Force).

NS-16 *Where are impacts on the fisheries industries considered in the DSEIS?*
Muckleshoot Indian Tribe

There is no discussion in the DSEIS of the resource-based industries. This is consistent with the characteristics of the proposed action and the requirements for nonproject EISs set forth in WAC 197-11-442.

Fisheries industries are recognized in Proposed Policy FW-RUa (b) of the Rural Character Task Force's Draft Recommended Refinements to the Countywide Planning Policies and their importance should be reflected in the comprehensive plans of the jurisdictions.

NS-17 *How do you compare the benefits of proposed mitigation measures with impacts on the natural environment?* Muckleshoot Indian Tribe

See response IN-6.

NS-18 *The discussion of the relationship among vehicle trips, urban centers and air quality is very misleading. What is the proposed mitigation to satisfy the federal air pollution standards?* Allan, Fis/ED Task Force (Barden), City of Seattle, Greater Maple Valley Area Council

Urban centers are expected to concentrate households and workplaces into more compact urban forms. The choices for people to move around the urban center by walking, bicycling or transit are expected to be more appealing and less polluting. With sufficient population in an urban center, service by high capacity transit becomes more practical and economic. For trips inside an urban center or between urban centers, ideally there would be no need for an automobile.

The reality is that there will be automobile trips inside and between urban centers as well as to and from non-urban centers. The consequence is that even if there are fewer trips per person inside the urban center, there could still be just as many passenger-trips because there are more people in the area. These trips could be the worst for air pollution - i.e., short and slow ones. As the DSEIS says, motor vehicles can produce up to 30 times their normal emissions per mile during a cold start. Any trip with a lot of idling and slow speeds produces the highest exhaust emissions. The conclusion is that even worse air quality could result if the total number of automobile trips inside urban centers is not reduced.

The DSEIS suggests that increasing land use densities will reduce travel demand and vehicle trips. This should be qualified, however, as follows. Reduced travel demand is likely only if other measures, such as parking fees, safe bicycle trails and pedestrian walkways, good intra-urban center transit service and frequent high capacity transit between urban centers can change travel behaviors. The key idea is that the density of urban centers makes it more economic and practical to provide the facilities and services that allow citizens to substitute a less polluting mode of transport for another.

NS-19 *Does the DSEIS underestimate the probable adverse impact of the Magnet Alternative on air quality?* Wilcock

The DSEIS argues on page 171 that there is an internal contradiction in the Magnet Alternative. While the alternative prefers transportation policies that would support high occupancy vehicle travel and increased density in developed areas it also supports a more dispersed land use approach that would undermine the conditions for effective transit.

If, as the commenter suggests, the Magnet Alternative is "auto-friendly" and would encourage more single occupant vehicle miles, then general air quality might be expected to be adversely affected. This situation might be ameliorated by the more dispersed nature and the better operating conditions of these trips relative to those in more congested areas. This means that there could be more vehicle miles traveled but with less air pollution impact per vehicle mile than in an urban center.

NS-20 *If the number of automobile trips increases, how can King County meet the requirements of the 1990 Clean Air Act Amendments for CO, TSP, O₃ and PM₁₀?* Wilcock

While the entire approach discussed in the DSEIS is to reduce the number of vehicle trips, there are some other strategies developed by the Puget Sound Air Pollution Control Agency. These include:

- 1) Developing zoning ordinances that restrict the siting or expansion of commercial and industrial activities and public capital facilities whose air emissions may have an adverse effect on adjacent or nearby land uses and activities;
- 2) Introducing code revisions that promote the use of clean "alternative" forms of domestic use fuels and discourage the use of wood for space heating;
- 3) Eliminating incentives to burn garbage and yard debris by providing municipal waste collection services; and
- 4) Conditioning local building permits to minimize dust from construction and land clearing activities and encourage debris recycling.

Several jurisdictions, including King County and the City of Seattle, have adopted many of these strategies in their draft comprehensive plans. They acknowledge the overwhelming role of automobile emissions in King County's air pollution problems.

CPP CA-13 requires jurisdictions, in coordination with the Puget Sound Air Pollution Control Agency and the Puget Sound Regional Council, to develop policies, methodologies and standards that promote regional air quality consistent with the CPPs.

NS-21 *The SEIS should address the likely impact of the Ground Water Management Plans on the Countywide Planning Policies?* Federal Way Water & Sewer

Since the Ground Water Management Plans (GWMPs), surface water and comprehensive sewer plans are incomplete, it is not possible for the SEIS to comment on the feasibility of protecting ground water quantity and quality under the conditions proposed by the CPPs. This is an extremely critical issue considering the importance of ground water resources to King County (see discussion in NS-10).

NS-22 *What is the impact of increased urban density, impervious surfaces, capital improvements, etc. on water quality?* Federal Way Water & Sewer, Fis/ED Task Force (Barden), Beaver Lake Community Club, Muckleshoot Indian Tribe, Wilcock, Allan

A brief qualitative discussion of these relationships is included in the initial subsections (i.e., Introduction, Impacts of Alternatives) in the Significant Impacts section of Chapter 15. A quantitative discussion for specific areas is outside the scope of the SEIS.

NS-23 *Does directing growth to urban areas necessarily reduce impacts to water quality?* Muckleshoot Indian Tribe

The DSEIS assumes that water quality is least affected when growth occurs in urban areas, served by the Metro sewer system. The assumption is that reliable urban sewer and stormwater services and good site planning can compensate for the impacts of increased residential and workplace densities. It will also depend on the success of policies and programs to reduce the levels of automobile use in urban areas.

NS-24 *How can water quality impacts be mitigated?* Muckleshoot Indian Tribe

As the commenter states, the mitigation of water quality impacts takes more than proper planning, design and implementation of wastewater and drainage system control measures. It takes post-construction monitoring and enforcement, a reliable way of quickly identifying water quality problems and implementing control measures, and the development of best management practices and facilities that take a realistic and practical approach to actual problems.

NS-25 *What are the beneficial environmental impacts that are ascribed to the Economic Development Policies?* City of Seattle

While the Economic Development Policies do not propose any new environmental policies, they do promote regulatory reforms that would enhance the effectiveness of the implementation of existing regulations, and cost effective programs that would encourage water and power conservation in public facilities and in the private sector.

NS-26 *What are the possible impacts of the increased urban densities on vegetation, fish and wildlife?* Allan, King County Dept. of Public Works (Laswell), Muckleshoot Indian Tribe

As the DSEIS notes on p. 181, it is difficult at a general policy level to determine the potential impacts that may be caused by on-going or future site-specific activities. The density of urban environments is not the only determinant of the viability of a diversity of plant, animal and fish species. Good individual site planning and the sensitive placement of structures and facilities can support the maintenance of critical fish and wildlife habitat and habitat networks even in urban settings.

NS-27 *What are the possible impacts of the rural character policies on vegetation, fish and wildlife?* King County Dept. of Public Works (Laswell), Muckleshoot Indian Tribe, City of Seattle

The DSEIS concludes that minimizing rural and resource land conversion would have least impact on the majority of the remaining natural vegetation and the overall integrity of the natural environment. This last remark does need to be qualified. Actions in specific parts of the Rural Area (e.g., clearing, poor agricultural practices) can have significant impacts on important natural resources, such as salmonids.

The DSEIS refers to a table of rural character policies which could have a significant adverse impact on plants animals and fish. This missing table is included in Table 12 in the Appendix.

NS-28 *What are the differences between King County's Sensitive Areas Ordinance and the Forest Practices Act?* Muckleshoot Indian Tribe

As discussed in the response to NS-7, King County's Sensitive Areas Ordinance is restricted to unincorporated King County and to a limited number of types of sensitive areas. Forest practices in King County must comply with the Washington State Forest Practices Act (RCW 76.09), and in designated Shoreline Environments, with the requirements of King County's Shoreline Management Master Program. King County however retains its authority to deal with local land use issues associated with forestry activities through its Sensitive Areas Ordinance and other regulations.

The broader issue of habitat protection during forestry activities is not one for the SEIS but rather for the comprehensive plans of the relevant jurisdictions.

NS-29 *Treaty implications of unavoidable impacts to plant, fish, wildlife (mentioned on p. 186 of the DSEIS) should be recognized in FEIS.* Muckleshoot Indian Tribe

Comment acknowledged.

Hopefully these issues can be resolved during the joint review of the comprehensive plans of the jurisdictions and in the report on environmental protection activities required by CPP CA-15 (see NS-3).

NS-30 *What will be the noise impacts associated with concentrating development under each alternative and especially the Centers Alternative? What are the impacts on SeaTac Airport?* City of Des Moines

Comment acknowledged. On page 193 of the DSEIS, impacts of the alternatives are discussed. It is recognized that all the alternatives are discussed. It is recognized that all the alternatives would result in long term noise impacts due to greater concentration of growth. The resultant impact on SeaTac Air capacity is beyond the scope and level of detail of this document. The Port of Seattle is currently developing their environmental impact statement for the SeaTac Airport Master Plan Update. This document will assess the land use impact on airport operation to capacity.

VII. ECONOMIC DEVELOPMENT

Generic Issue: Manufacturing Centers

What issues are involved in attracting or maintaining manufacturing/industrial companies in the county? Is there sufficient land available? What are the environmental implications?

EC-1 *What are the environmental problems with redeveloping industrial lands and the costs of remediation? Fis/ED Task Force (Barden)*

Site-specific physical and biological environmental problems associated with redeveloping industrial lands are beyond the scope of the DSEIS. A general response is possible. To the extent these problems impose the cost of remedying past contamination on a company that wants to locate or expand within the county, the price of locating in the county will increase; and an expected price-rationing effect would be to discourage firms that either produce low value added products or require extensive amounts of land per dollar of output.

EC-2 *Do these Countywide policies ensure appropriate locations to attract and maintain high wage/high value jobs such as those supplied by Boeing and Microsoft? Fis/ED Task Force (Barden), Imperatori*

The CPP do not directly address this need. A key analytical assumption of the DSEIS was that the regional population and employment forecasts contained in the PSRC's *Vision 2020* document would not be changed by any of the CPP alternatives. The DSEIS acknowledged the possibility that King County's total employment could be affected by the CPPs -- with off-setting changes occurring in other counties in the region -- but the probability of this occurring in a significant manner was considered small given the larger market forces acting on the regional and county economies. The CPPs may affect the location of jobs and employers but not their number.

The methods used to evaluate the economic development impacts of the five alternatives and five variations were designed to address issues appropriate to the policy level of the CPPs and used a methodology normally and reasonably relied upon by economists in drawing inferences about potential policy impacts. However, as projects or actions are proposed within the context of the CPP policies, separate project or action-specific SEPA review may be required.

EC-3 *If land intensive industrial jobs were to increase the demand for land in the Manufacturing Centers, there is no analysis in the DSEIS to indicate that the Centers would be unable to accommodate both the existing and future industries. And there is no information presented that leads to the conclusion about the types of jobs that will become available or lost. City of Seattle*

Comment acknowledged. The response to question EC-2 describes the procedures used to evaluate the potential economic development impacts of the five alternatives and the five variations on the Manufacturing Centers. The analysis is conducted in terms of economic variables such as land costs, employment, and value added and the analytical methods used are ones normally and reasonably relied upon by economists in drawing inferences about potential policy impacts. In the DSEIS, the concept of "being able to accommodate" is addressed through an analysis of relative land costs within and outside of the Manufacturing Centers.

EC-4 *Given the lack of land for manufacturing in King County, the trend for manufacturing's demand for land to grow more rapidly than its demand for workers stresses the importance of preservation of industrial land if the county is to maintain and increase industrial employment. Imperatori, Stern*

The relationship between the availability of industrial land, the relative cost of industrial land and job creation is discussed in the DSEIS both with respect to the five different alternatives and five variations. DSEIS Table 2 also suggests that there is adequate land capacity to absorb employment growth with the proposed Manufacturing Centers.

EC-5 *The finding that manufacturing and industrial activities which use land extensively and generate low value added per square foot will probably be price rationed out of Manufacturing Centers emphasizes the need for monitoring of long term effects. Stern*

Comment acknowledged. The DSEIS discusses the uncertainty of any policy related EIS and the need for on-going monitoring; and it also discusses need to the produce project specific EISs as they are proposed within the context of the CPPs.

Generic Issue: Jobs & Job Creation

What issues are involved in creating full time, family-wage jobs in the County? Are markets inside the Centers sufficiently large to support such jobs? What are the cost implications?

EC-6 *Some commenters doubt the ability of the Centers to meet the employment targets and further question, even if the targets are met, whether some of the types of jobs envisioned for the Centers will allow for self-sufficiency, let alone actually contribute something to the overall economy. Fis/ED Task Force (Seaman), Greater Maple Valley Area Council*

A key analytical assumption for this SEIS is the acceptance of the PSRC's employment and population forecasts. These planning forecasts assume that total regional employment and population are constant for all alternatives. The possibility exists that King County's total employment and population could be affected by the CPPs with off-setting changes occurring in other counties in the region, but the probability of this occurring in any significant manner is small given the larger market forces acting on the regional and county economies. The impacts of the CPPs consequently will most likely be on the County's geographic distribution of future growth rather than on its rate. The CPPs may effect the long term capacity of King County to accommodate commercial/industrial development and employment growth, but if this occurs it will likely be along the county's northern or southern borders where market forces will make businesses indifferent to location in King County as opposed to Snohomish or Pierce Counties - other factors such as wage rates and taxes being the same.

EC-7 *Does the last sentence in the discussion of the Eight Centers Alternative (page 205) intend to imply that a reduction in the number of people who professionally engage in automobile sales would be a significant adverse impact? City of Seattle*

Consistent with normal and customary economic analysis, all jobs created in free markets are considered to positively contribute to the efficient operation of the local economy.

The DSEIS implies, and it is correct for the reader to infer, that any reduction in the number of people employed is evaluated as an adverse impact, and if the number of persons whose employment is eliminated is large, then the adverse impact is considered significant.

Generic Issue: Housing, Property Values and Economic Development

EC-8 *Is there a link between the creation of jobs, economic development and the provision of housing? Does the absence of affordable housing discourage employers from locating in King County? Lozier Homes*

The demand for housing, and the subsequent amount of housing supplied, is importantly influenced by the level and growth of jobs in the local economy. However, a key analytical assumption for the SEIS is the acceptance of the PSRC employment and population forecasts. These planning forecasts assume that total

regional employment and population are constant for all alternatives. The possibility exists that King County's total employment and population could be affected by the CPPs with off-setting changes occurring in other counties in the region, but the probability of this occurring in any significant manner is small given the larger market forces acting on the regional and county economies. The impacts of the CPPs consequently will most likely be on the County's geographic distribution of future growth rather than on its rate. As a result, the CPPs will effect the geographic distribution of housing but not the amount of housing provided.

While it is true that housing cost pressures could impact the ability of local employers to recruiting workers, the competitiveness of local employers in regional and world markets is primarily affected by larger national and international forces rather than by the cost of housing in the local economy.

EC-9 *One comment questions the statement on page 205 of the DSEIS: "Viable middle income single family residential neighborhoods outside the centers should not be affected much. ... The focusing of population growth into the centers however will result in a relative decline in property values in these neighborhoods although absolute property values should continue to rise." City of Seattle*

The methods used in the DSEIS are consistent with regular and customary procedures used in economic analysis. The statement simply points out that property values should grow at a faster rate in Urban Centers, which should experience a greater increase in demand relative to their size than will single family areas outside Centers.

Generic Issue: Urban Centers

Can the Urban Center concept work? Will businesses located in the Centers be as economically efficient as elsewhere? What if businesses and people don't want to locate in the centers? What will happen to the demand that gave rise to non-center locations for economic activity?

EC-10 *The 14 Urban Centers Alternative assumes that nearly 100,000 additional people can be encouraged to reside in those Centers in the course of the next 20 years. Is it a reasonable assumption to think that we can jam that many people into what is by far the most densely developed areas of the county? What about the economic consequences of such an effort? What kind of economic incentives and subsidies would be necessary to make this happen? Can we afford it? Fis/ED Task Force (Seaman), Greater Maple Valley Area Council*

As noted in response LA-6, market feasibility issues were beyond the scope of the DSEIS. The DSEIS does point out that if the level of demand under the two Urban Centers alternatives is not enough to support the economic and life-style viability of the Urban Centers, the County may be faced with the choices of (a) adopting a more growth enhancing (rather than simply growth management) economic strategy, (b) not minimizing adverse physical and biological environmental impacts by going to fewer urban centers, or (c) not achieving the High-Capacity Transit and high density culture/life style envisioned as part of the Urban Centers concept.

EC-11 *As the city's recent study of mixed-use development shows, the "build it and they will come" assumption does not work. ... The FSEIS should include an analysis of the practical limits to mixed use development. Glase*

Assessment of market feasibility was beyond the scope of the DSEIS. See also response LA-6.

EC-12 *One comment observes that the cost of expanding a business in a developed area with little space for new growth is not cost-effective. Will the Urban Centers strategy drive the small business to close and move out of the area? Lemon*

This possibility is discussed with respect to households in response LA-4(a) and on DSEIS pages 24 and 25.

Generic Issue: Inter-jurisdictional Competition

Will jurisdictions compete with each other for jobs? If they do, what type of competition will result? Will different alternatives effect the way inter-jurisdictional competition takes place?

EC-13 *One commenter challenges the statement on DSEIS page 204 that job competition among jurisdictions in the No Action Alternative could have adverse environmental impact by making "choice land available for siting industrial and commercial buildings." City of Seattle*

The DSEIS discusses the possibility that jurisdictions will compete with each for jobs in the future in the same - or even greater - extent than they do now. It states that one consequence of the DSEIS's underlying assumption that the different alternatives will have no impact on the region's total future employment is that this type of inter-

jurisdictional job competition will occur in the context of a “zero sum game” - that is, a jurisdiction can only get additional jobs by taking them away from other jurisdictions.

Because Washington’s constitution (as interpreted by the state supreme court) severely limits the use of financial incentives for the attraction of industry, one of the few methods of competing for new jobs is to establish land use regulations and zoning which will be attractive to industry. This type of reasoning about the consequences of a “zero sum game” environment is a normal and customary analytical method used in economic reasoning. Also see response LA-13.

EC-14 *The DSEIS stresses the importance of multi-county cooperation and the uncertainty about cumulative impacts the CPPs would have when combined with any CPPs in Kitsap, Pierce and Snohomish counties. Fis/ED and others need to be brought up to speed on the Regional Economic Strategy Project. ... The strategy work should be integrated with growth management planning. Stern*

Comment acknowledged. That there would be benefits from the integration of economic growth strategies and growth management planning is an inference which is appropriately drawn from the material contained in the DSEIS.

EC-15 *The conclusion of the SEIS that “Without the guidance that County growth and development policies, regional industrial siting policies, or a three-county economic development strategy would provide, a distinct possibility exists that inter-jurisdictional competition for jobs could develop” is wrong. The more likely effect of a lack of coordination will be to lose the 787. In other words, No Action will not result in Tukwila fighting Renton or Pierce County for the 787 plant but the lack of coordinated regional infrastructure investments to support such a plant, which could go to Kansas. Stern*

Comment acknowledged. See response to EC-13.

Generic Issue: Suburban Office Parks

Are suburban office parks needed to attract certain types of commercial activity? Will they leave the county if suburban office parks are not allowed? Are suburban office parks compatible with an Urban Centers alternative?

EC-16 *The DSEIS acknowledges that there is a shortage of suitable properties for the kinds of entrepreneurial businesses which are developing in this county at the present time. ... And yet there is no alternative strategy to deal with this important issue. Weyerhaeuser (Cladon), Quadrant*

The DSEIS discusses under the No Action Alternative the continuation of current development trends, which includes the continued development of suburban office parks. The discussion of the No Action Alternative follows reasoning that is normally and customarily used by economists in drawing inferences about future events and projecting future trends.

EC-17 *One commenter suggests that projections of a ten percent growth rate in light manufacturing will require an aggressive program to build office and industrial parks. Will there be sufficient land for this?* Immunex Corporation (Rankin)

As described in response LA-13, the assumption of a 10 percent growth in manufacturing was done at the request of the Fis/ED Task Force and is clearly optimistic in view of PSRC forecasts for that sector.

DSEIS pages 33 and 34 indicate that the availability of land capacity for future growth of business and office parks is uncertain. DSEIS Table 3 suggests that there is considerable capacity for the projected increase within the four proposed Manufacturing Centers. This is subject to the concerns regarding the feasibility of development in these areas that are addressed in responses LA-13 and EC-1.

Other Issues

EC-18 *The SEIS should include a discussion regarding the impact of transit service/facilities on economic development.* Metro (Bush), Barden

The level of detail provided in the CPPs is not sufficient to determine potential economic growth and development impacts that may potentially occur in either the presence or absence of rail-based transit.

The DSEIS defines both the Eight and 14 Centers Alternatives to include the provision of transit and analyzes the impacts of these alternatives within the context of this definition. The discussion contained in the DSEIS explicitly refers to one of the impacts of the centers alternatives as a reduction in private vehicular traffic due to the provision of transit and the use of demand management methods; and it evaluates this impact using methods normally and customarily used by economists in assessing development impacts.

EC-19 *One commenter observes that "this document does not tell me what is wrong, what is going on right now. We need to identify and understand current reality and what our goals and objectives are. How are we going to do it so that we maintain the economic viability of this area?"* Vyzis

The DSEIS section, "AFFECTED ENVIRONMENT" (page 199), presents a discussion of the current status and recent history of the county economy in terms of jobs, unemployment, family and business income, and commercial valuations.

The analysis of the five alternatives and the variations, especially the Fis/ED Task Force proposed policies, presents comments pro and con on strategies for monitoring the economic viability of the King County region. Detailed analysis of implementation measures is beyond the scope of the DSEIS. See response LA-6.

PART FOUR: COMMENTS AND TESTIMONY

Written Statements on the Supplemental Environmental Impact Statement (SEIS) for the Countywide Planning Policies (CPP's)

Last Name/Organization

Ackerman/K.C. Housing Partnership
Allan
Anderson/City of Snoqualmie
Bannecker/Washington Natural Gas
Barden/Fis-Ed Task Force
Baxendale/1000 Friends of Washington
Bernberg
Blue/Sheldon A. Blue & Associates, Inc.
Bogel/West One Bank
Bossart
Brady/East Sammamish Community Council
Burckhard/Lozier Homes
Bush/Metro
Causey/Puget Western, Inc.
City of Pacific
Claudon/Weyerhaeuser
Elfelt
Frank/Washington State Dept. of Transportation
Gillespie/Puget Power
Glase/Edward J. DeBartolo corporation
Gunby
Harman
Imperatori/Env. & Economic Balance Council
Iordanidis/Soos Creek Water & Sewer District
Keesling
Kilgore/City of Des Moines
King County Urban Groundwater Purveyors
Kirchner/Regional Transit Authority
Kleeberg/K.C. DDES
Lappenbusch/Lozier Homes
Laswell/K.C. Dept. of Public Works
Lawrence/City of Seattle
League of Women Voters
Lemon
Lewandowski/City of Redmond
Lewis/Boeing
McIntosh/J.L. McIntosh & Assoc. Inc.
McPhee
Miles/African-American Agenda

Miller/Pacific Properties Inc.
Nilon/Hedges & Roth Engineering, Inc.
Norton
Nykreim
Odle/City of Bellevue
Pease/Seattle King County Assoc. of Realtors
Pritchett/Federal Way Water & Sewer
Roth/Hedges & Roth Engineering, Inc.
Sanderson
Schooler/Sterling Realty Organization
Seaman/Greater Maple Valley Area Council
Segner/Kidder Mathews & Segner Inc.
Sokol/City of Auburn
Smith/Seattle Water Dept.
Stalzer/Lowe Enterprises Northwest, Inc.
Stead/Suburban Cities Assoc.
Stendal/Beaver Lake Community Club
Stern/Fis-Ed Task Force
Stevens/Muckleshoot Indian Tribe
Stewart/City of Kirkland
Strosahl/Conversations about the Future
Tagney Jones, et. al.
Verrette
Verschuyl
Wilcock
J. Williams/Master Builders Association
P. Williams/Adolfson Associates, Inc.
Winbauer
Wiselogle/City of Bothell
Yuan/King County School Coalition
F. Zimmerman
G. Zimmerman/City of Renton
Knapp/City of SeaTac
Potter/Kauri Investments, Ltd.
Vance
/

Transcript
February 9, 1994
Metropolitan King County Council
Growth Management, Housing & Environment Committee
Public Comments on DSEIS for CPP

Name/Organization

Introduction Letter by Chris Vance
Gamble-Hadley/K.C. Housing Partnership
Watson/K.C. Housing Authority & Fis-Ed
Dearborn
Gillespie/Puget Power
McDougall/WA. Natural Gas
Fitzgerald/Quadrant
Rankin/Immunex Corporation
Strosahl/Vision Seattle
Tagney-Jones/Sensitive Growth Alliance
Escher
Strosahl
Clayton
Upper/Conner Development
Lappenbush
De Moro
Spence/SKC Assoc. Realtors, etc.
Halstrom
Fletcher/People for Puget Sound
Smith/Graham & Dunn
Wilcox
Mayor Rowan Hinds/City of Issaquah
Segner
Dankelson
Washburne
Toner
Kean
Vyzis
Seaman
Imperator
Barden
Elfelt
Madison
Moss
Hill
Harman

Name/Organization

McCarty
Claggett
Burrows
Jardaine
Haggard
Sweetland
Lehman
Kinder
O'Farrell
House
Sanderson

**GMHE Committee Meeting
February 9, 1994
Written Comments/Handouts**

J. Tayloe Washburn/Foster Pepper & Shefelman
Hallstrom
McDougall/WA. Natural Gas
Kean/East K.C. Regional Water Assoc.
Barden
Weyerhaeuser Co. & Real Estate Co.
The League of Women Voters of K.C.
Greater Maple Valley Area Council
Upper
The Cosmos Group
Imperator
Dearborn



KING COUNTY
HOUSING
PARTNERSHIP

Mr. Jim Reid, Manager
February 28, 1994
Page 2

February 28, 1994

VIA FACSIMILE AND FIRST-CLASS MAIL

Mr. Jim Reid, Manager
Planning and Community
Development Division
King County Parks, Planning
and Resources Department
707 Smith Tower Building
506 Second Avenue
Seattle, WA 98104

Re: Draft Supplemental Environmental Impact Statement for
Amendments to the County-Wide Planning Policies

Dear Mr. Reid:

On behalf of the King County Housing Partnership, I am writing to offer comments on the affordable housing chapter of the Draft Supplemental Environmental Impact Statement (SEIS) for amendments to the County-wide Planning Policies.

The following comments are intended to help elected officials and the public consider housing affordability as a policy objective on an equal footing with other policy objectives, so that fully informed decisions can be made about the future of our region. For the last 20 years, many policy decisions, while responding to real problems, have had unintended consequences for housing affordability. The King County Housing Partnership has studied this process in the Blueprint for Affordable Housing (1991) and The Story of Benson Glen (1993). One of the compelling messages of The Story of Benson Glen is a call to "reassert the importance of housing affordability" and "re-examine the trade-offs which are now being made between housing affordability and other important public purposes." The Draft SEIS is one tool to help us strike this balance.

Since it was formed in 1989, the Partnership has engaged community leaders in efforts to encourage development of affordable housing not just at lower income levels but across the economic spectrum. The Partnership has advocated efficient use of land and infrastructure, quality design for higher density,

and new approaches to land use planning, regulation and infrastructure financing. We support alternatives to historic lower-density development patterns and have worked with King County to implement the Growth Management Act. The Board of the King County Housing Partnership represents a variety of views on planning issues, and while every member may not agree with every comment offered below, the following comments attempt to apply the lessons we have learned over recent years to the Draft SEIS. They are offered in the spirit of cooperation embodied by the Partnership's past efforts.

General Comments

1. Clarify the focus of the analysis. The affordable housing chapter touches on two distinct subjects, the impacts of the five alternatives on housing affordability and the effectiveness of policies intended to promote housing affordability. It is not always clear, however, which subject is under discussion. The chapter would be clarified by first analyzing the impacts of the alternatives on housing affordability in the absence of affordable housing policies, and then analyzing how the affordable housing policies achieve their policy objectives under each alternative. Indeed, since housing affordability is an affirmative policy goal, the selection of a preferred alternative should consider the alternative that best promotes housing affordability, balanced with other policy goals.

2. Re-examine the conclusion that market forces operate independent from and to the frustration of public policy. The affordable housing chapter states as its two main findings that market factors have significantly greater impact on housing costs than housing policies, and, as a result, the differences in impacts of the alternatives are minor (pages 59, 65). These findings imply that market forces may frustrate housing policies regardless of the alternative distributions of population and employment.

Housing markets themselves, however, react to land use policies and regulations. This will be all the more true under GMA, which attempts to manage dynamic markets. The King County Housing Partnership has found that public policies substantially affect the ability of the private sector to build housing that working families can afford. For example, the Blueprint for Affordable Housing indicated that 69% of the increase in single family housing costs between 1980 and 1990, and 91% of the

H0-5

H0-2

increase in multifamily costs over the same period, were attributable to escalating costs of land acquisition, land development, and infrastructure, and that policies affecting land supply, development regulations, and infrastructure availability were important contributors to the increase. The Final SEIS would benefit from an expanded discussion of how the five land use alternatives affect housing costs.

HO-3 3. Clearly describe housing needs based on the OFM population forecast. Nowhere in the Draft EIS are the needs of the population to be accommodated over the next 20 years clearly stated. While low income need is documented in the Appendices, the document does not present a clear picture of housing requirements for the 325,000 new people expected to live in King County.

Implicit in the affordable housing conclusions are a variety of assumptions regarding demand. For example, assumptions for household size, housing preference, and ability to pay for housing given job/income forecasts, are all required to analyze the impact of the alternatives. Stating these assumptions clearly, or identifying other studies that will also address these issues, would allow for a better understanding of the policy choices presented by the alternatives.

HO-1 4. Expand the discussion of land use and infrastructure assumptions. The affordable housing chapter assumes that population forecasts are the same, and that sufficient capacity for population growth can be provided, under each alternative (page 64). The chapter would be strengthened by identifying factors that could result in changed assumptions. This is necessary to avoid assuming away potential impacts that should be considered. For example, if housing prices rise too far under one or more of the alternatives, then there may not be enough housing capacity for population growth, greater demands will be placed on transportation systems as population moves to more affordable markets, and population forecasts will change. Given the strong emphasis in the planning policies on urban centers at specific densities, the feasibility of achieving desired densities and accommodating the balance of housing at affordable costs outside of centers deserves further discussion in the SEIS and other studies. Other factors that merit further analysis include types and levels of employment and their effect on housing types, land capacity and yield, land cost, the relationship between household make-up and housing types, and housing density assumptions.

The affordable housing chapter should also state and evaluate assumptions about infrastructure. The Draft SEIS apparently assumes that infrastructure will be evenly available throughout the urban growth areas (see page 3). Many areas, however, may not have infrastructure to serve projected population and employment. If new housing is asked to bear a large share of the cost to correct infrastructure deficiencies, this will have a heavy impact on housing affordability and distort the patterns of development.

HO-5 5. Clarify and expand the discussion of mitigation. There are generally two approaches to the question of housing affordability. One is driven by planning priorities that do not directly consider housing affordability. Under this approach, a land use concept is chosen, and housing affordability is sought only as mitigation within the framework of the land use concept. The other approach establishes housing affordability as an equal priority and seeks land use concepts that balance all competing goals.

The Draft SEIS appears to discuss housing policies as mitigation. If, however, housing affordability is not advanced by the basic planning concept of one or more of the alternatives, then the mitigation measures discussed in the Draft SEIS will have limited benefit. Indeed, they could actually raise prices in the overall housing market, as the Draft SEIS notes of inclusionary zoning. In this chapter of the SEIS, it would be helpful to analyze which alternative best advances a strong affirmative goal of housing affordability, and then analyze measures to balance other policy objectives.

HO-4 The Blueprint also warned that impact/mitigation fees and regulatory costs would become critical to housing affordability in the 1990s. This was confirmed at Benson Glen. The mitigation section would be strengthened by an expanded discussion of proposals to reduce the burden on housing resulting from inefficient regulations and growing reliance on impact fees to pay for infrastructure.

Specific Comments

HO-15 1. Page 60, column 1, paragraph 6 states that "[t]he sharp price spike between mid-1987 and mid-1990 . . . [i]s due primarily to strong job growth and immigration into King County." Demand has an impact on price, but restraints on supply exacerbate

Mr. Jim Reid, Manager
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price effects. A timely response to demand is critical to housing affordability, and is one of the objectives of planning under the GMA. The Blueprint for Affordable Housing identified a number of policy decisions that contributed significantly to rising costs during the late 1980s (pages 16-17). Some of those policy directions are continued in the county-wide planning policies, and their impacts should be more fully analyzed.

HO-5 2. Page 65, column 1, paragraph 5 states that "communities may have difficulty meeting affordability goals in any of the alternatives even with the implementation of the affordable housing policies." This is an extremely important statement. One of the specific planning goals of the Growth Management Act is to encourage the availability of affordable housing to all economic segments of the population. RCW 36.70A.020(4); 36.70A.210(3)(e). If this cannot occur under the alternatives being proposed, the reasons should be analyzed and other alternatives that better promote housing affordability should be considered.

HO-6 3. Page 66, column 2, paragraph 5 states:

Another [possible impact of the centers alternatives], though not analyzed in the SEIS, is that prices might rise high enough to divert some household growth to less costly parts of King County and to other counties.

It is not clear why this potential impact was not analyzed in the SEIS. At a minimum, it would be helpful to identify the conditions under which this impact might occur, i.e., what factors would cause such an increase in prices.

HO-7 4. Page 68, column 2, paragraph 5, the discussion of Economic Development Policies, would be strengthened by noting that housing prices affect the ability of the County to attract and maintain employers. If an unintended consequence of one or more of the alternatives is the reduction of housing affordability, a further consequence will be the frustration of economic development objectives.

HO-8 5. Page 69, column 1, paragraph 3, the discussion of rural policies, should include a wider discussion of the affect of the policies on housing affordability. Will housing in rural areas, and in urban growth areas adjacent to or surrounded by rural lands, be affordable under the proposed policies? In addition, the Blueprint for Affordable Housing observed that policies for

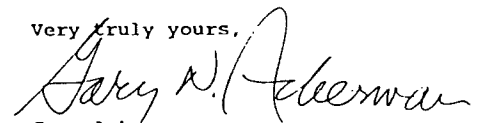
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Page 6

rural land on the edge of urban areas often leads to high-priced large-lot projects, which add nothing to the affordable housing stock and diminish the land base on which moderate-priced dwellings might some day be built (page 17). This impact, and possible mitigation measures, merit further analysis in the discussion of rural policies.

Conclusion

The Growth Management Act presents our region with the challenge of balancing thirteen planning goals as we anticipate the demands of the future. One of these statutory goals is housing affordability. In The Story of Benson Glen and other studies, the King County Housing Partnership has called on the community to reassert the importance of housing affordability as a policy goal. We need to understand how the county-wide planning policies will affect housing costs, so that they promote and do not unintentionally impede the explicit goal of encouraging housing affordability for all income levels. The SEIS is one tool, together with fiscal impact analyses, centers case studies, and other work in progress, to allow informed decisions about the balancing of different planning goals. On behalf of the King County Housing Partnership, I thank you for the opportunity to comment, and extend our commitment to work with County governments, businesses, and citizens on the tasks that lie ahead.

Very truly yours,


Gary Ackerman
Chair, Executive Committee

cc: King County Council
King County Housing Partnership Executive Committee

321225

February 27, 1994

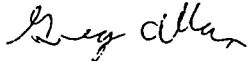
Jim Reid, Manager
Div. of Planning & Community Development
707 Smith Tower Building
506 Second Avenue
Seattle, WA 98104

Re: Comments on Draft Supplemental Environmental Impact Statement
for the Countywide Planning Policies

Dear Mr. Reid:

Please find attached comments on the Draft Supplemental
Environmental Impact Statement for the Countywide Planning
Policies.

Sincerely,



Gregory R. Allan
530 - 254th Ave. N.E.
Redmond, WA 98053
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DRAFT SEIS COMMENTS

1. Fact Sheet, bottom of third page, "Subsequent Environmental Review"; This section indicates many policies (Rural Character, Affordable Housing, Fiscal Analysis and Economic Development) are still under development and are subsequent to the draft SEIS. These forthcoming policies will impact many elements of the environment. Therefore, the draft SEIS is addressing a fragmented, incomplete project and is inadequate. What is the criteria for issuing another SEIS? What is the criteria by which addendums can be used versus a SEIS? Isn't the cited "phased approach" contrary to SEPA requirements for project phasing? These same comments apply to the approach outlined in Introduction pages vii through x.

IN-1

2. How will King County limit the scope of final policy adoption and urban/rural line amendments to preclude a) significant SEPA changes, b) elimination of public process and c) all other due process requirements?

IN-1

IN-2

LA-11(a)

3. Introduction, Key Findings; The findings for the urban centers only indicate positive attributes. Why aren't the negative attributes also listed? For example, the urban centers will require significant road upgrades, produce higher chemical concentrations in storm water, concentrate crime, require fire fighting equipment upgrades and the like.

4. There is no historical or economic comparisons to similar areas (i.e., Los Angeles, South San Francisco Bay area, etc.). How can we not expect the Puget Sound area to develop in the same way? What makes these policies any different? Won't housing affordability go the same way? If not, why not? What will make our transportation systems any different as the area grows?

T-1

IN-2

5. The proposal is not adequately defined as required by WAC 197-11-060(3)(a). For example:

- a. Is the definition of the proposal in essence re-zoning?
- b. How can policies without the effect of implementing ordinances define the proposal? Are the missing ordinances that would support the policies

analyzed anywhere?

c. What information is missing or unavailable as required per WAC 197-11-080? For example:

- EN-2
- A wildlife inventory.
 - The completed applicable drainage basin plans.
 - A complete East Side transportation plan.
 - An assessment of compliance with the Endangered Species Act.
 - Implementing legislation on most of the Plan policies.
 - The downstream rural areas are not covered by drainage plans.
- S-22
- S-26
- VS-6
- IS-1
- IS-2
6. The Supplemental DEIS is to include direct and indirect impacts (WAC 197-11-060(4)(d)). The impact of the effects of growth is specifically cited in SEPA. King County has not included many indirect impacts. Will King County include an assessment of the following indirect impacts?
- The deterioration of Lake Sammamish's and Lake Washington's water quality due to increased urban surface water run off.
 - The deterioration of existing fish habitat due to urban surface water run off (chemical and physical effects).
 - The loss of managed, threatened and endangered species.
 - The cumulative impacts on items a, b and c.
7. What are the baseline urban and rural levels of service and performance standards (i.e., police response, road standards/level of service, school capacity, etc.)? Where are they listed? What baseline urban and rural levels of service and performance standards are used to determine a) whether the existing areas meet those standards, b) if the policies can practically meet those standards and c) what is needed (i.e., finances, infrastructure, service improvements) to meet those standards if the policies indicate they will not be met?
8. Most school districts have capital facilities plans. Why weren't they used to determine present capacity, future capacity and deficits?

LA-30

9. The Supplemental DEIS indicates growth will be phased to urban centers. What are the planning, laws and permitting tools that accomplish this? If they are lacking, what legislation or administrative procedures are proposed to accomplish it? By what time frame?

10. SEPA requires that beneficial aspects of an alternative can not be used to offset its negative impacts. In numerous locations, the Supplemental DEIS cites the benefits of the urban center concept without any significant citation of the negative aspects. This appears to violate the purpose and intent if not the law of SEPA.

NS-18

11. Introduction, Section VII, page xv, Air Quality: The urban centers will draw more vehicles to a small area. Like other urbanized areas, the carbon monoxide, ozone and particulate levels will increase. Vehicle trips may proportionally decrease but the absolute number of trips will increase. This section of the supplemental DEIS is very misleading and does not tell the whole story.

12. Introduction, Section VII, page xv, Schools: Outside the existing urban centers, there is a current shortage of school facilities. This trend will continue. See comment number 8.

13. The maps in the Supplemental DEIS indicate an urban/rural line different than indicated by recently adopted Community Plans. Since the Supplemental DEIS is based on that line, then it will be inadequate if the line is simply moved to concur with adopted Community Plans.

IN-9

14. Page 1: It is stated that the CPPs can only be realized through local plans and local regulations. What is the process to ensure that happens? To what extent are those plans and regulations going to be deficient at the time the CPPs and County Comprehensive Plan are adopted? The Supplemental DEIS should assess the impact of this lag.

IN-2

15. Page 2: The transportation level of service policies are not included in the Supplemental DEIS. This is a crucial component of the overall analysis.

How can a policy analysis and decision be made without this element? The Supplemental DEIS is, therefore, inadequate.

16. A Supplemental DEIS is for a decision maker to make a reasoned choice between alternatives to achieve a specific proposal. The Supplemental DEIS consistently states that its purpose is to guide further refinement of on-going policies. Is the subject proposal a Countywide development document or a policy development document?

17. Page 2 and 3: At what point are the policies sufficiently amended to require another supplemental EIS and additional public process?

18. Page 3: It is stated that quantitative analysis was not conducted. Existing conditions can be quantified by existing County and local jurisdiction documents. Reasonable conceptual level extrapolation could be made from that data.

19. Page 3: Transportation corridor models could be accomplished on the urban center alternatives. Qualitative analysis could be done on the feasibility of existing and proposed transportation systems to meet those Urban Center needs.

20. The Supplemental DEIS does not identify a preferred action its alternatives that have lower environmental costs and degradation as required by SEPA. Note that a Supplemental DEIS is to follow virtually all of the requirements outlined for an EIS.

21. The Supplemental DEIS cites many mitigation measures. What process will tell the public which specific mitigation measures will be included in the adoption of the CDP? Where those mitigation measures require new regulations, what must be the time frame for them to be concurrent with the implementation of the CDP?

22. Page 59: Market forces either preclude affordable housing or market manipulation by government require offsetting affordable housing with more higher end, more profitable housing. The only other solution is government

subsidy of affordable housing. What is the taxpayer impacts if that alternative is selected to meet the County's goals?

23. Monitoring and feedback of growth impacts is cited in the Supplemental DEIS. Where is the baseline condition to measure by? What are the accepted public standards to judge success or implement course corrections?

24. WAC 197-11-055(6) indicates environmental documents and analyses shall be circulated and reviewed with other planning documents to the fullest extent possible. Will the basin plans, groundwater studies, municipal service analysis, infrastructure cost summaries, the Community Plans and a host of other directly supporting documents be included with the Supplemental DEIS? Shouldn't they at least be made known to the decision makers with respect to incomplete or unavailable information (WAC 197-11-080)?

25. King County will probably allow urban/rural designation changes during the policy adoption process. Such a procedure is after the EIS analysis and public process. How can the executive and King County meet the intent of SEPA (informed choice of alternatives based on FEIS information) when land use changes occur after the process? Is not this a violation WAC 197-11-020, -030, -055, -060, -080, -400, -402 and Part Five of the ACT? Won't it violate a number of public due process requirements?

26. The adequacy of Police Services between different urban designated areas is missing. Incorporated areas of King County have 1.2 to 1.7 officers per 1,000 population. Unincorporated urban areas of King County have a ratio of less than 0.3 officers per 1,000. Emergency response times are greater than 12 minutes (more than 6 minutes greater than incorporated areas of King County) and non-emergency (misdemeanor and complaints) call responses average 20 minutes to never. Some calls are responded to with complaint forms sent in the mail. Is this an existing and future unavoidable adverse impact or subject to mitigation? Isn't this one example of inconsistent levels of service between urban designated areas? Doesn't this point out the lack of

defining publicly determined and accepted standards as required by GMA?

27. Policies contained in the Supplemental DEIS that are not implemented by ordinances have no legal standing. Therefore, there could be no effect to substantial effect of the policy depending on how or if it is ever applied. The Supplemental DEIS does not assess the environmental impacts of the range of ability to implement the policies. Therefore, the proposal is ill defined, many policies are in effect useless and there is insufficient implementation analysis to allow reasonable public comment.

28. The King County parks and recreation planning ordinance standards for urban designated area are considerably lower than for incorporated areas. As a matter of practical implementation, the current supply is lower than the County standards which is lower than incorporated urban areas. In other words, King County designates areas urban but does not provide urban levels of parks and recreation opportunities. This historical and future impact is not sufficiently addressed in the Supplemental DEIS. Is this an existing and future unavoidable adverse impact or subject to mitigation? Isn't this one example of inconsistent levels of service between urban designated areas? Doesn't this point out the lack of defining publicly determined and accepted standards as required by GMA?

29. Project EISs in King County and the Puget Sound Air Pollution Control Agency indicate many areas and specific intersections occasionally exceed Federal air pollution standards. This point, and others, must be included in the County wide air quality assessment for the existing and projected conditions. What are the proposed mitigations or is compromising public safety an unavoidable adverse impact of the urban center concept?

30. The growth alternatives propose dense development near or drain to salmon migration and/or rearing areas (i.e., Lake Sammamish, Lake Washington, Patterson Creek Basin, etc.). The Supplemental DEIS does not assess the chemical and physical impact of the urban center's storm water on these resources.

LA-1

31. Is the land use plan based only on a growth allocation or a carrying capacity of the land? Is this basis fixed for some period of time? If not, when and how can it change? What is the numeric criteria for these two methods? Where is it derived? Is it technically, politically, economic derived?

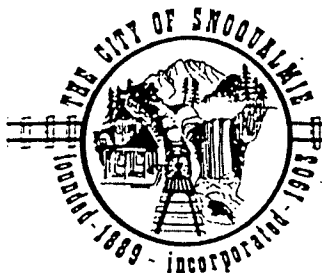
32. Given future development in the unincorporated urban designated areas will have lower than publicly accepted service and infrastructure standards, shouldn't there be a policy on limiting such development until those standards are achieved by annexation or incorporation?

33. Ordinances intended to mitigation growth impacts usually have a theoretical funding lag of six years. There historical lag is well in excess of six years (i.e., 6th year road CIP projects are always 8 to 12 years away from construction). This is an impact not addressed in the Supplemental DEIS.

34. The water supply section does not have an existing and predicted inventory to demand analysis. This can be done on a conceptual basis from existing water district documents.

35. The storm water management section does not indicate that the chemical nature of urban storm water impacts can not be mitigated by existing methods.

36. The sewer/septic section does not consider the transition of different increased impacts from development to densities on septic systems to densities on sewers (i.e., increased chemical component of storm water).



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P.O. Box 1304, Issaquah, WA 98027

February 25, 1994

Mr. Jim Reid
Manager
Planning and Community Development Division
Parks, Planning and Resources Department
707 Smith Tower
Seattle, WA 98104

RE: City of Snoqualmie Comments on DSEIS on
Countywide Planning Policies

Dear Jim:

This letter contains City staff comments on the January 12, 1994, Draft Supplemental Environmental Impact Statement on the Countywide Planning Policies. We appreciate the opportunity to have input to this most significant process for the future of the region.

All of our comments should be viewed in context. We appreciate the immense amount of hard work and interjurisdictional cooperation that originally went into preparing the CPPs, and that has gone into the proposed additions and refinements. The City is not opposed to the Centers concept embodied in the CPPs per se, but we feel because of the far reaching consequences to all jurisdictions, adequate environmental and fiscal analysis is imperative before we irrevocably commit to such a set of policies.

Our overall evaluation is that this document is inadequate to meet the requirement of Ordinance 10450 to "analyze the probable significant environmental, including countywide impacts of the proposed refined set of policies." This is particularly unfortunate in our view, because of the highly suspect adequacy of the original SEPA review, which merely consisted of adoption of existing documents, particularly the Vision 2020 EIS and the 1985 Comp Plan EIS,¹ and because of the absence of substantive

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Page 2

IN-4

fiscal analysis of the feasibility of the policies and their effect if implemented on the revenues and expenditures of cities, at the time of the July, 1992, adoption of the CPPs.

We advanced the view in 1992 that the adoption of the CPPs, without substantive fiscal analysis of their effects and adequate environmental review, was ill-advised. The response was: "Don't worry, we'll do an SEIS and fiscal analysis later." The DSEIS does very little to allay our concerns, and the pressure we see now is to accept the policies anyway because now it is too late to change course.

There are four principal reasons we came to the conclusion that the DSEIS is inadequate to properly inform decision makers on the impacts of the proposed refined set of policies and alternatives.

First, the DSEIS uses the wrong twenty-year period for its analysis.² The correct period is a twenty-year period commencing on plan adoption (1994), which makes the end year 2014, not 2010.³ Because the OFM population forecast for King County for 2010 is 1,833,133 and for 2012 is 1,857,618, and assuming only that similar growth will occur between 2012 and 2014 as is forecast between 2010 and 2012, the effect of using 2010 as the end year is to understate OFM forecast population growth by 48,970 people, or 32,637 households (at 1.5 persons per household), which does not meet the mandate of RCW 36.70A.110.

IN-2
IN-4

Second, the DSEIS authors assumed that all alternatives can be accomplished and will be implemented, without consideration of the cost, feasibility, fiscal impacts, and market viability, and

¹ Determination of Significance and Adoption of Existing Environmental Documents, May 5, 1992.

² The Executive Summary Title: "A Vision for King County in 2010"

³ "Based upon the population growth management projection made for the county by the office of financial management, the urban growth areas in the county shall include sufficient areas and densities sufficient to permit the urban growth that is projected to occur in the county for the succeeding twenty year period." [emphasis added]

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without consideration of the location or capacity of existing infrastructure (Introduction, p.3; Land Use, p. 21).

IN-4 The DSEIS should have taken into account the work of the Fis/ED Task Force with respect to cost, feasibility, fiscal impacts and market viability. The Task Force has received much information, and formed some preliminary conclusions contrary to the assumptions made in the DSEIS. With regard to fiscal analysis particularly, it is our view that the fiscal impact analysis required by GMA and clarified in the Snoqualmie decision cannot be so separated from the environmental analysis. A set of policies that would, for example, not be reasonably capable of being achieved, or which would have a devastating fiscal impact upon one or more classes of cities, will assuredly have significant adverse environmental impacts, which should be but are not now known to decision makers. To the extent that the assumptions of the DSEIS in these areas are shown to be incorrect, its entire analysis becomes spurious.

IN-4 Knowledge of the location and capacity of existing infrastructure is so important that it must be mentioned separately. Because so many of the actual environmental impacts of the alternatives depend upon the location and capacity of existing infrastructure, this should have been one of the principal data sets generated for the DSEIS. It is something that needed to be studied, not assumed. There is significant reason to question the DSEIS assumptions regarding infrastructure, particularly that it is more efficient and less costly to serve higher density areas. If this cornerstone assumption is incorrect, as it appears to be, the entire edifice is in jeopardy.

IN-2 Third, it seems to us that the DSEIS relies far more upon speculation than upon studies or data for many its various assertions.

LA-11(a) One example of this will suffice. Contrast these statements in the DSEIS regarding the effect of increased densities: (1) A commitment to higher densities (under the centers alternatives) will result in "enhanced sense of shared public purpose and commitment to neighborhood values through closer community ties". (Land Use, p.24), and (2) Increased densities in rural cities

Mr. Jim Reid
February 25, 1994
Page 4

"could cause a decrease in the quality of life due to a substantial change or loss of community character." (Land Use, p. 42). Both of these statements are pure speculation, unsupported by citation of studies. Equally valid speculation (probably more supportable in fact) is that one is considerably more likely to know more of his neighbors and be committed to neighborhood values in any rural city than one is to know the people who live on the floors above or below in an urban center high-rise.

LA-11(a) Speculation is unavoidable to some degree, but it should be acknowledged as such, and in this regard the DSEIS is deficient.

IN-2 Fourth, the DSEIS appears tainted by a lack of objectivity in evaluating alternatives. Specifically, the DSEIS exhibits a distinct pro-centers bias.

LA-9 This bias is shown, for example, in the discussion regarding the Fis/ED recommendation regarding changing the CPP policies on office and business parks.⁴ The DSEIS criticizes these recommendations because they "undermine the outcomes of both Centers Alternatives." The authors state: "Quite simply, the notion is that well-designed, highly livable Urban Centers will encourage people to work and live there." (Executive Summary, p. vi). The assumption that people will chose to live and work in centers may or may not be true; this is precisely what should have been tested in the DSEIS.

IN-2 Bias towards one alternative outcome under study is totally unacceptable in environmental review. Bias causes the DSEIS to appear more as a justification for an outcome favored by the authors than an evaluation of reasonable alternatives.

It should be noted that Centers are not a concept emanating from GMA itself; GMA's principal requirements for urban growth areas are (1) that all cities be included in urban growth areas in which urban growth is encouraged,⁵ and (2) that urban services

⁴ Policies of the CPPs which were declared by the Growth Planning Hearings Board not to be in compliance with GMA in any event.

⁵ RCW 36.70A.110(1)

are to be provided by cities.⁶ Centerdom may be one way of complying with GMA, but it certainly is not the only way. If the Centers Alternatives would require restricting growth in areas where urban growth is required to be encouraged, i.e., in all other non-center cities, or would result in insufficient actual capacity in designated urban growth areas for projected growth, then centerdom not only is not required but would be inconsistent with GMA.

In a worst case scenario, the combined effect of the foregoing deficiencies of the DSEIS could be disastrous. It is repeatedly asserted by the authors that it will be more efficient, less costly and have fewer adverse environmental impacts to accommodate new growth in high density centers. This assertion is made by the authors: (1) without knowledge of the location and capacity of existing infrastructure, (2) without knowing the cost or environmental impacts of retrofitting existing inadequate infrastructure in centers, (3) without knowing whether market demand will induce developers to build the centers or consumers to occupy them, and most importantly (4) without knowing what the adverse environmental impacts will be if the goals of centers cannot be achieved.

The following information appears to be coming forward from the Fis/ED Task Force: (1) nowhere in the United States has there previously been a systematic attempt to direct such a high percentage of new growth into redevelopment over such a large area, so there appears to be no prior experience to help assess feasibility;⁷ (2) case studies reveal that the goal of between 27% (Eight Centers Alternative) or 40% (Twelve Centers Alternative) of new growth in centers is extremely unlikely to be achieved within twenty years;⁸ (3) the experience of Puget Power and Washington Natural Gas is that it is actually much more expensive to retrofit inadequate infrastructure in high density

⁶ RCW 36.70A.210(1)

⁷ Paul Tischler, presentation to Fis/ED Task Force, February 15, 1994.

⁸ Urban & Manufacturing Case Studies, Fis/ED Task Force, January 18, 1994.

areas than it is to build new infrastructure in lower density areas;⁹ and historical consumer demand for ownership of multifamily units is very low, around 15%, and likely to change very slowly.¹⁰

Decision makers cannot afford to ignore such information in deciding whether it is more efficient, less costly and has fewer adverse environmental impacts to accommodate new growth in high density centers than in other urban growth areas, as is asserted in the DSEIS. If decision makers were to rely on the assertions of the DSEIS and proceed with all hopes pinned on centerdom, especially if that were coupled with policies that artificially restrict new growth in non-center urban growth areas (cities),¹¹ and it should turn out that centers cannot accommodate their anticipated share (as seems most likely), it would likely precipitate an environmental - and social - crisis, especially if growth were to exceed the OFM forecast.

In short, the adverse impacts of policies committing us to a course of action that may not be feasible are exactly what an environmental impact statement must address.

We also wish to offer the following more specific comments:

Executive Summary, p. vi. The text states that it is important to remember that the CPPs are "only a framework" and do not dictate how each jurisdiction will handle its share of growth. This is incorrect, to the extent that it implies Countywide Planning Policies are only "suggestions"; CPPs have the force of law and are mandatory and directive.¹²

⁹ Testimony of Bob Gillespie and Gerry McDougal to King County Growth Management, Housing and Environment Committee, January 26, 1994.

¹⁰ Jim Hebert, presentation to Fis/ED Task Force, February 22, 1994.

¹¹ A policy, which despite being contrary to RCW 36.70A.110 requiring that urban growth be encouraged in all cities, has been suggested as essential to support centerdom.

¹² Snoqualmie v. King County, GPHB 92-3-0004.

IN-7

Executive Summary, p. vi. It also states that the CPPs "established" an urban growth area. This is incorrect. Although there was a recommended urban growth area shown on a map, the text of the policies established a process for future determination of urban growth areas for the cities in the rural area, which was clearly to occur at some time after adoption of the CPPs. ESHB 1761 (1993) has now made it clear that urban growth area designations are a function of the county comprehensive plan and not the CPPs in any case.

Executive Summary, p. x. Reference is made to the purpose of the separate fiscal analysis as being to determine how much the policies will cost in terms of public financing and investment in infrastructure. That would be an interesting and useful piece of information, but it is not the fiscal analysis required either by Ordinance 10450 or by the Snoqualmie decision, which rather requires analysis of the fiscal impact of the policies upon the viability of cities and upon their revenues and expenditures.

Executive Summary, p. xiv. Text here and in the DSEIS at numerous other places, lumps together "rural cities" with "unincorporated rural areas and resource lands." This is analytically incorrect and contrary to RCW 36.70A.110. Rural cities must be designated as urban growth areas, within which urban growth is encouraged, while exactly the opposite is true of rural lands and resource areas, which are areas in which growth can occur only if it is not urban in nature.

Introduction, p. 3. It is asserted that growth targets are required through 2010. As noted above, GMA requires growth targets for the twenty year period commencing on plan adoption, which would mean 2014 if deadlines are not further extended.

Introduction, p. 5, and Land Use, p. 42. The text states that under the No Action alternative, UGAs would not be designated around cities in the rural areas, and rural city UGAs might or might not match the currently designated rural city expansion areas. This description of the alternative is a significant

misstatement of the law. Under RCW 36.70A.110 as amended by ESHB 1761, the county is required to designate urban growth areas in its comprehensive plan, and cities are prohibited from annexing beyond the designated urban growth area, whether or not the CPPs are amended or GMPC takes any further action.

LA-3/ Land Use, p. 5. It is stated that too large a cushion (excess of capacity over targeted growth) would "encourage continuation of inefficient, lower density urban development sprawling outward from urban centers." Efficient densities can, however, be promoted by appropriate development regulations¹³ outside of centers. The undefined term "sprawl," highly laden with negative connotation, apparently means to the authors any development that occurs outside of centers. In fact, higher density development in cities outside of centers is not sprawl; "sprawl" is appropriately defined as "classic suburban development [which] consumes large areas of land in large lots supporting a relatively small number of residents."¹⁴ Development away from centers may be sprawl, but it does not have to be.

LA-2
LA-4 Land Use, p. 25. The text states that "rural cities, including the expansion areas in adopted community plans, have insufficient cushion for their growth target." We note initially that neither the final urban growth areas nor the official target growth numbers have yet been set by the Metropolitan County Council, so it is not possible to make this assessment based on the two factors which will ultimately control. Furthermore, whatever may be true of other cities, Snoqualmie has an adequate cushion capacity for any target growth currently under discussion, if the negotiated urban growth boundaries are approved. The one number neither the County nor the Liaison Group has requested from the City is a capacity analysis of existing corporate limits plus the negotiated urban growth area; by our calculations, that capacity is at least 25% greater than the current working target number. The solution is simple in any event: increase the size of the designated urban growth areas around cities where inadequate cushion is an issue.

¹³ See the Snoqualmie Mixed Use Ordinance, chapter 17.26 SMC.

¹⁴ The Pierce Report, Seattle Times, October 1 - 8, 1989.

LA-16
LA-32

Land Use, p. 42. The text states that under the No Action alternative, "the policies for regarding development within the rural cities will only be used as policy guidelines rather than directives." The policies which purported to direct development within rural cities, LU-27, were stricken by the Growth Planning Hearings Board, however, and would not be given substantive effect in any case. This entire paragraph appears to be a non-sequitur based upon a faulty assumption (that UGAs would not be designated under the No Action alternative).

LA-33

Land Use, p. 43. The authors assert that the 14 Centers alternative will produce the least amount of adverse impacts or rural cities. This is highly doubtful. Growth does not in and of itself have adverse impacts on rural cities; in fact, more adverse impacts, fiscal, social and environmental, will probably occur if policies restricting growth prevent rural cities from having viable population, tax base and economies. Rural cities must have the financial resources to conduct municipal business, including environmental protection.

Land use, p. 45. It is asserted that increases in population in rural cities will cause a loss of community character and degrade the environment. No studies or data are cited to support this. It does not appear to be true. Enumclaw, with 8,000 people, does not have less "community character" than Snoqualmie, with 1,550. Carnation, with 1,250 people, cannot provide a municipal sewer system, which would be a significant step in preventing environmental degradation, while the larger rural cities are able to do so. Environmental protection requires fiscal resources, which in turn probably requires a larger population than all of the rural cities except Enumclaw currently have.

LA-16

Land Use, p. 47. The DSEIS merely mentions rather than analyzes the differences between the Rural Character Task Force policies and the Suburban Cities' alternate proposed policies. We have previously commented on the RCTF proposed policies, which we believe do not comply with GMA to the extent they purport to discourage urban growth in areas which under GMA must encourage urban growth. It is clear under GMA that an urban growth area is not to be subordinated to the surrounding rural area. The policies of the county with respect to the surrounding rural area will ultimately control its character in any event.

LA-16

Land Use, p. 52. It is asserted that the Magnet Alternative "may not be as effective in controlling the potential for sprawl in rural areas or preserving the quality of life in rural cities." Again, it is analytically incorrect to lump rural areas and cities in the rural area. Growth in rural cities does not equate to "sprawl." With all due respect, the issue of the "quality of life" in rural cities is an area better left to the rural cities than to the GMPC, which does not have a single resident of a rural city among its current regular members.

IS-5

Human Services, p. 102. It is asserted that the centers alternatives would have fewest impacts to human service delivery in rural areas. This is incorrect. Human services needs are lower in absolute quantity in rural areas, but not in importance to the people who live there. Human services delivery is currently notoriously bad in the rural areas, including within the rural cities generally, since most rural cities are required to contract with County agencies to which services within the rural cities is but an afterthought. Human services delivery could only be improved with larger populations and tax base in the rural cities, resulting in correspondingly greater ability to provide needed services.

Human Services, p. 105. The Rural Character Task Force policies would establish a distinction between urban and rural service areas. This would seem to further diminish the perceived importance of human service needs in the rural cities, where teens still get pregnant and drop out of school,¹⁵ and every other problem that causes a need for human services exists, just as it does in larger cities.

IS-6

Water Supply, p. 125. Strangely missing from this discussion is any mention of the fact that one of the essential features of the Centers Alternatives will be the necessity of a huge aqueduct carrying immense amounts of water relatively long distances from eastern King County, where the water source is located, to the

¹⁵ The teen pregnancy rate is actually higher in rural cities, where the availability of services is lowest.

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February 25, 1994
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centers. Evidently it is permissible to ignore the rural character policies generally when it supports the centers outcome but not otherwise.

Stormwater Management, p. 135. It is asserted that growth that is concentrated in existing urban areas will have the least impact on stormwater management. If the issue is water quality, note that on page 134, it is disclosed that apparently over two-thirds of the City of Seattle, storm water is discharged untreated into Puget Sound. If the issue is cost, then it is pure speculation to claim that retrofitting existing inadequate storm water facilities is less expensive than building new ones in less dense areas.

IS -4
Sewer/Septic, p. 142. The authors claim that more growth in rural cities under the Magnet Alternative would require capital intensive improvements to expand services, which could most adversely affect the rural cities. For some cities, such as Carnation, this is a Catch 22; more population is the only way such improvements can be paid for. In Snoqualmie, regulations are in place that require new development to construct the sewer improvements that are required as a result of that development, so this statement is definitely not true for Snoqualmie. The larger population envisioned under the Magnet Alternative, assuming Snoqualmie is found by a sufficient number of people to be a more attractive place to live than other cities, will actually have a positive effect with respect to sewer improvements, with a corresponding benefit to water quality.

IS-4
Utilities, p. 150. There is an underlying assumption in this section that in urban areas there is existing infrastructure in place or it can be expanded at a "moderate capital investment." Yet it is candidly admitted, as noted above, that the DSEIS is actually uninformed as to the location or capacity of existing infrastructure, and the costs of retrofitting inadequate infrastructure are not known to the authors, whereas Puget Power and Washington Natural Gas are clear that such retrofitting costs are extremely high, not "moderate."

Utilities, p. 153. It is noted that RU-12 would discourage providing urban levels of utility service in rural areas. This is either illegal or counterproductive regarding certain

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utilities. What would one consider a "rural" level of electric service? Electric utilities cannot discriminate in service levels. Providing natural gas service to rural areas near existing gas transmission mains has fewer rather than more adverse environmental impact than wood stoves, and less adverse impact on electric demand than electric heat.

Water Quality, p. 174. The DSEIS acknowledges that the water quality (presumably of Puget Sound) will be adversely affected by the concentrated growth in the western UGA. We value the water quality of the Snoqualmie River, and believe that expansion of sewage treatment facilities and construction of stormwater runoff treatment facilities, which are both viable only if the population and tax base are sufficient, have positive rather than negative effects.

LA-2

Finally, we note that the tables B-1 through B-5 all are incomplete or incorrect with respect to Snoqualmie. This may be because all tables appear to be based upon 1991 information, when along with the majority of other cities in King County, we did not feel we were sufficiently along in the process to provide any level of detail. As noted, the City has never been asked for a capacity analysis of the current corporate limits plus the negotiated urban growth area. In 1993, we provided more appropriate figures for use for planning purposes, and are currently in the process of continuing to revise the numbers.

Thank you again for this opportunity to comment.

Very truly yours,

CITY OF SNOQUALMIE

Patrick B. Anderson
Patrick B. Anderson
City Attorney

/PBA

cc: Hon. Jeanne Hansen
Paul Barden, Fis/ED Chair
Chris Vance, GMH&E Committee Chair
Mr. LeRoy Gmazel

DATE: February 25, 1994

TO: Jim Reid
Planning and Community Development Division
Parks, Planning and resources Department
King County

FROM: Randy Bannecker

RE: Comments on the draft Supplemental Environmental Statement for Amendments
to the Countywide Planning Policies

Thank you for the opportunity to comment on the SEIS.

More than anything, the comments that follow serve to correct information now in the utility section. The corrective language was also offered to the drafters of the utility element of the comprehensive plan.

12.0 Utilities

Inventory of Facilities

p. 150, 3rd paragraph

IS-7 The section reads, WNG's gas supply is brought to this area on two parallel supply lines operated by the Northwest Pipeline Corporation. We suggest deleting the words two parallel because the phrasing sounds as though the lines are far apart.

Forecasting of future needs

p. 150, 2nd paragraph

This paragraph contains some misleading figures. We recommend the following as a replacement:

WNG forecasts a 61 percent growth in customers by the year 2012. WNG has planned for or acquired gas supply and pipeline capacity to meet the demand of current customers and anticipated growth for the next 20 years. As described by WNG's 20-year integrated resource plan, natural gas supply available to the Pacific Northwest meets or exceeds the company's needs.

Washington Natural Gas Company
815 Mercer Street (P.O. Box 1869), Seattle, Washington 98111. (206) 622-6767

Location and Capacity of New and/or expanded Facilities

p. 151, 2nd paragraph

This paragraph is misleading. We recommend the following as a replacement:

Notwithstanding the issues of local growth, WNG strives to maintain a prudent level of reserve capacity in the distribution system through a continuous analysis and reinforcement program that includes individual projects ranging in duration from 3 - 24 months. WNG's distribution system expands using a "just in time" capacity philosophy that enables the company to respond to growth when and where it occurs.

Significant Impacts

The introduction to the section on Significant Impacts (p. 151) states:
"...the more concentrated development in urban areas...the more efficient and cost effective the delivery of utility services."

Although the SEIS did not include cost and feasibility factors in its analysis of the alternatives, it did discuss efficiency of utility service provision. The Eight and Fourteen Center Alternatives were said to have the greatest potential for energy efficiency and positive impact on the delivery of utility services (p. 152).

IS-4 WNG does not understand how the stated efficiencies are achieved with higher densities. Our experience within our service area indicates that operations and capital costs are the highest in densely populated areas. It costs more to serve gas customers in Seattle than in Bellevue; and more in Bellevue than in smaller cities.

The increased costs of density are confirmed by reviewing operations and maintenance costs for natural gas utilities nationwide. Cities with greater populations per square mile, or greater densities, tend to be more expensive places to provide natural gas service. We suspect the same is true for other utility service providers.

To compare natural gas operations and maintenance numbers to consumer costs, WNG reviewed cost of living indicators such as groceries, housing, utilities and transportation. The general trend held. Dense cities like Boston and Washington D.C. were more expensive places to live than Albuquerque and New Orleans. (see attachments)

Note: Attached is a copy of remarks made to Councilmember Vance's Growth Management Committee regarding these economy of scale issues within the SEIS.

Attachment

February 9, 1994

Comments on the utilities section of the SEIS
to Metro King County Council

Good morning.

My name is Gerry McDougall. I serve as Vice President for Special Projects for Washington Natural Gas. We're a privately held natural gas utility, serving 286,000 customers in King County.

Thank you for the opportunity to comment this morning.

WNG fully supports the goals of Growth Management to ensure that King County remains a great place to live and work---for us and for our children. Through involvement on the Fis/Ed Committee and one-to-one work with planners, WNG has been active in the GMA planning effort.

Today, I bring you our comments on the draft SEIS. I appreciate the magnitude of the SEIS task, particularly given the aggressive timetable on Countywide Planning Policy adoption. However, I'm concerned that ~~IN-2~~ King County risks adopting policies that are based on good intentions instead of hard facts. This document is not an adequate tool with which an elected official might make an informed decision on the Countywide Planning Policies.

Specific to our business, the SEIS discusses private utilities, but it does not provide any depth of information that would allow WNG to adequately assess impacts of the various alternatives on our company and on our ability to provide service to our customers---now and in the future.

The theme, as stated in the introduction of the utility section, is "...the more concentrated development in urban areas...the more efficient and cost effective the delivery of utility services."

The Eight and Fourteen Center Alternatives are said to have the greatest potential for energy efficiency and positive impact on the delivery of utility services.

The "cost-effectiveness" or "affordability" of density has served as the underpinning of King County's the Growth Management planning effort. But we do not understand how this "cost-effectiveness" or "affordability" can be achieved through high density land use. Everything we've studied says there is a point at which increasing density increases cost of service and reduces efficiency.

Our experience within our service area drives home this point---our operations and capital costs are the highest in densely populated areas. It costs more to serve gas customers in Seattle than in Bellevue; and it costs more to serve gas customers in Bellevue than in smaller cities; and so on.

This is true not just in King County, but throughout the nation. We've

looked at operations and maintenance costs for natural gas utilities nationwide. Cities with greater densities --- greater populations per square mile and more utility customers per square mile tend to be more expensive places to serve gas. We suspect the same is true for other utility service providers.

These higher costs of density don't end with natural gas service. If you look at cost of living indicators such as groceries, housing, utilities and transportation, the trend holds. Dense cities like Boston and Washington D.C. are more expensive places to live than Albuquerque and New Orleans.

LA-4 I remain very concerned that these policies will make it tougher for our employees to find affordable housing within King County and will send prospective customers outside our service area to Skagit, Kitsap and Kittitas counties by artificially constraining the supply of land.

Before we buy off on a plan calling for significantly increased densities,

let's be sure we take an honest, sober look at what that might mean to the residents and businesses of King County and what the physical, environmental, social, economic and political impacts will be.

I look forward to continuing to work with you and county planning staff to achieve a plan that can fulfill the vision of a strong economy and desirable living environment.

Thank you.

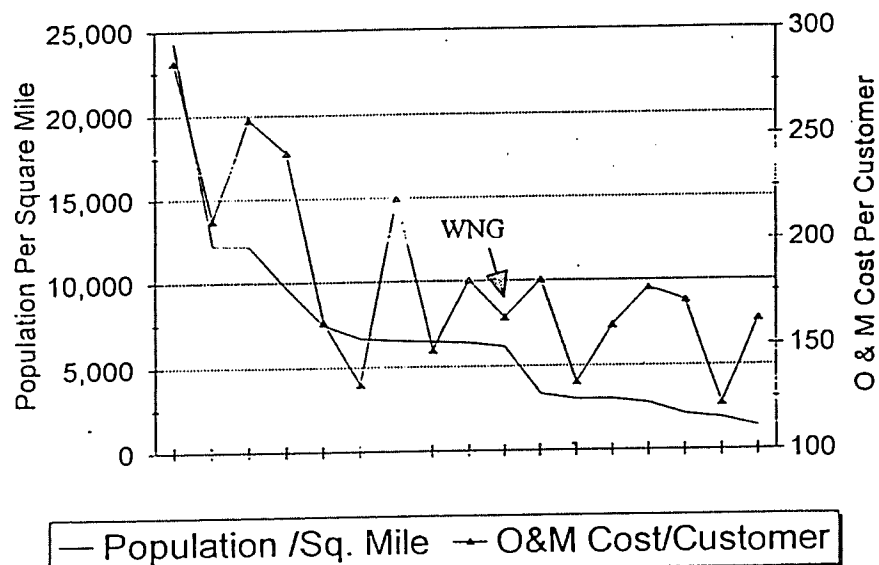
—NICOR— The Universal Almanac, 1990 census

ACCRA Cost of Living Index

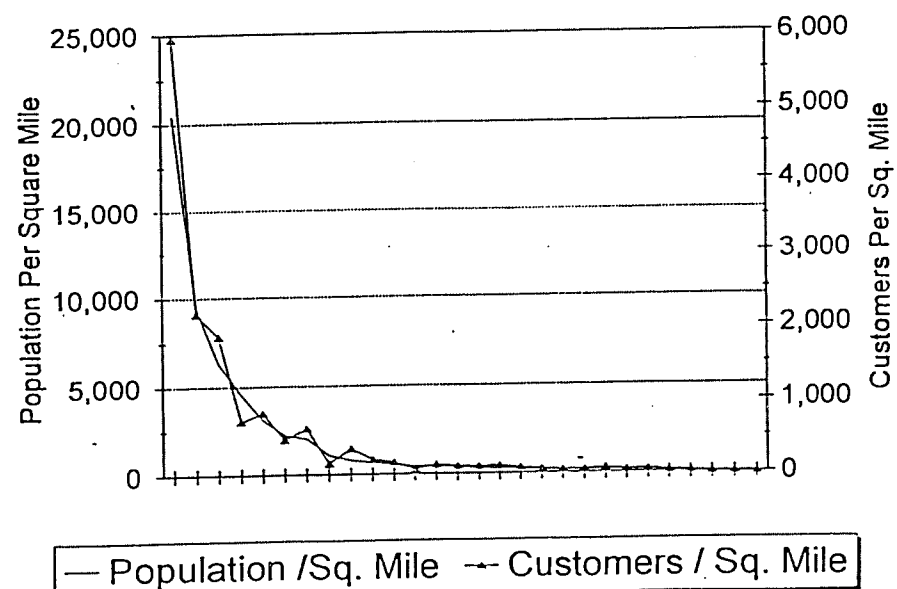
City	O&M Expense Per Customer	1990 Population	Square Miles	Population Per Square Mile	100% Composite	13% Grocery	28% Housing	9% Utilities	10% Transportation	5% Healthcare	35% Misc.
New York, NY	284.95	7,322,564	301.3	24,287	214.2	144.7	373.7	171.8	124.3	202.1	150.8
Chicago, IL	209.83	2,783,728	228.1	12,204	121.9	106.2	154.3	121.7	101.5	124.3	107.3
Boston, MA	257.75	574,283	47.2	12,187	136.9	114.0	175.8	145.7	131.1	140.0	113.2
Philadelphia, PA		1,585,577	136.0	11,559	131.5	119.5	145.8	189.4	112.7	128.0	113.8
Miami, FL		358,348	34.3	10,453	106.5	97.2	109.9	124.2	106.5	123.4	100.4
Washington DC	242.37	626,900	62.7	9,879	134.7	119.2	184.2	115.3	133.1	135.4	122.2
Los Angeles, CA	160.95	3,483,398	467.3	7,459	130.1	110.4	181.4	84.3	112.5	131.0	113.1
Minneapolis, MN	131.73	268,383	55.1	6,866	100.2	93.6	106.0	51.2	104.5	108.2	98.0
Milwaukee, WI	219.89	628,088	95.8	6,556	104.9	102.2	124.6	92.2	103.3	100.6	94.6
St Louis, MO	147.96	356,865	81.4	8,461	94.6	100.7	95.0	105.5	97.9	102.3	93.0
Cleveland, OH	177.13	505,616	79.0	6,400	110.1	101.9	117.8	125.9	108.9	112.1	102.4
Washington Natural Gas	162.60	616,259	83.7	6,168	117.7	117.3	145.8	62.4	110.7	138.4	108.9
Cincinnati, OH		364,040	78.0	4,667	100.5	89.7	108.3	107.5	99.1	96.6	108.1
Denver, CO		467,810	106.8	4,378	84.0	103.3	92.3	73.3	98.8	96.6	95.5
Toledo, OH	160.38	332,943	84.2	3,954	105.5	103.0	108.8	114.9	103.8	96.1	103.2
Portland, OR		437,398	120.7	3,624	108.2	99.9	127.1	70.8	112.8	127.4	102.1
San Diego, CA		1,110,549	328.6	3,380	132.3	109.1	195.5	71.2	129.8	134.3	106.4
Omaha, NE		335,765	100.0	3,358	91.1	93.0	83.0	92.8	105.5	97.8	91.4
Columbus, OH	180.38	632,958	189.8	3,335	107.8	105.3	112.8	108.6	112.2	105.8	103.1
Dallas, TX	132.21	1,008,831	333.0	3,024	103.8	97.8	97.4	119.5	106.3	113.5	105.1
Atlanta, GA	158.78	394,017	131.2	3,003	98.8	98.5	97.7	113.1	96.7	113.4	94.8
Albuquerque, NM		384,736	123.2	3,101	99.3	93.3	96.6	97.6	103.7	108.5	101.8
San Antonio, TX		935,927	329.1	2,844	92.7	92.0	85.0	77.3	107.4	99.5	98.0
Houston, TX		1,530,872	578.3	2,520	99.0	97.8	94.4	101.8	117.8	108.5	95.6
Tucson, AZ	176.49	425,390	145.3	2,760	106.5	100.4	101.2	59.0	102.8	120.5	114.0
Phoenix, AZ	176.49	583,403	392.8	2,504	98.7	97.0	91.2	52.9	115.4	111.7	100.1
New Orleans, LA		496,936	169.4	2,492	96.8	97.0	84.8	133.3	104.3	83.8	95.3
Charlotte, NC		358,003	159.0	2,251	99.8	95.9	96.5	107.8	95.8	103.2	101.8
Memphis, TN		610,337	284.1	2,315	94.2	95.9	82.1	90.0	103.6	97.5	101.1
Indianapolis, IN	170.49	741,952	351.9	2,108	95.3	97.4	92.5	92.7	95.8	95.1	97.2
El Paso, TX		515,342	247.3	2,084	97.9	91.2	92.1	94.8	111.9	96.4	102.2
Tulsa, OK		387,193	191.1	1,921	88.3	91.3	75.7	91.7	86.7	91.5	96.5
Austin, TX	122.08	465,577	246.6	1,888	94.8	94.9	83.5	101.4	103.5	90.7	99.5
Fort Worth, TX		447,619	299.8	1,659	94.5	95.5	83.5	108.2	105.4	106.1	94.4
Kansas City, MO	161.66	435,141	317.4	1,371	85.5	94.2	93.9	92.4	97.1	98.3	97.2
Nashville, TN		510,784	479.5	1,065	92.2	98.7	87.8	91.2	92.1	82.4	95.6
Jacksonville, FL		635,230	759.2	837	95.3	97.1	84.0	105.5	100.8	102.7	97.3
Oklahoma City, OK		444,730	631.1	705	91.1	92.1	78.2	102.9	97.3	96.5	95.4
Average - top 5 density		2,205,266	135.0	13,408	141.0	116.8	187.3	144.7	118.2	142.0	118.3
Average - # 7-12 in density		894,924	131.5	6,342	108.7	102.3	125.8	96.0	105.3	112.7	102.2
Washington Natural Gas		616,259	83.7	6,168	117.7	117.3	145.8	62.4	110.7	138.4	108.9
Average - # 13-18 in density		617,726	180.4	3,579	106.1	101.5	116.7	93.0	109.9	110.2	101.0
Average - # 19-24 in density		789,024	284.2	2,827	99.7	96.5	94.4	97.0	107.3	110.4	100.7
Average - # 25-30 in density		521,294	235.3	2,235	95.4	94.8	87.3	102.5	99.7	94.6	99.0
Average - # 31-36 in density		489,847	450.8	1,254	93.9	95.3	85.2	100.9	99.4	96.1	96.6

[see attachments]

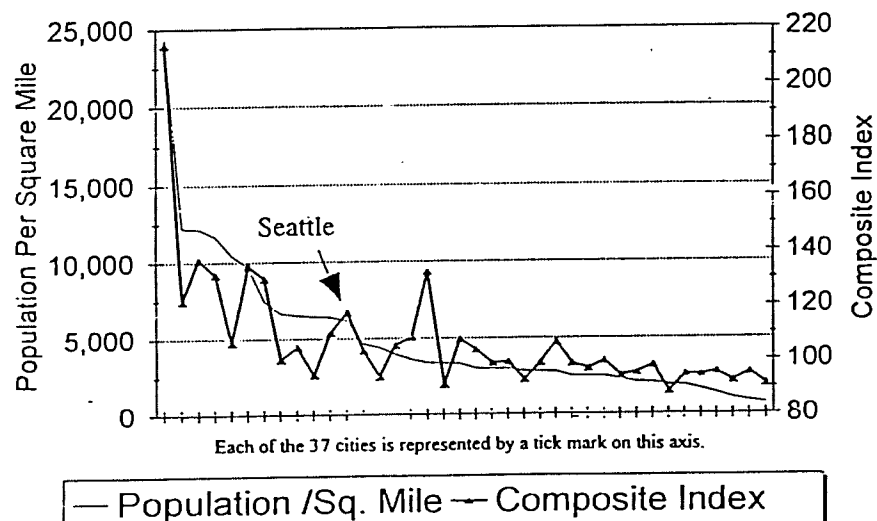
Pop. Density vs. O&M Cost/Customer
Shown for 17 Utilities



Pop. Density vs. Customers /Sq. Mile
Shown For 28 Utilities



Population Density Vs. Cost of Living Shown For 37 Cities



February 24, 1994

TO: Lisa Majdiak, Planning & Community Development Division

FROM: Paul Barden, Co-Chair Fis/Ed Task Force
Task Force Members: Jim Fitzgerald
Terry Seaman
Terry Lewis
Russ Segner

RE: COMMENTS ON THE COUNTYWIDE PLANNING POLICIES DRAFT
SEIS

The members of the Fis/Ed Task Force organized a systematic review of the Draft SEIS on the Countywide Planning Policies. While not a formal part of the Fis/Ed work program, members recognized the importance of this document for decision making at the GMPC as well as for work at our Task Force in evaluating the fiscal impacts of the Countywide Planning Policies.

I have reviewed this document and participated in substantial discussions with the Task Force members. The Task Force has not made formal findings on the Draft SEIS nor did it take formal action on the comments made by individual members. Nevertheless, strong themes emerged through the organized review as well as in my own which I would like to share with the GMPC. After reading my formal comments other Task Force members have asked to add their names to this letter.

The Purpose of this SEIS is to analyze the probable effects of a reasonable range of alternatives for the countywide planning policies. To do this, the SEIS should be based on data sets which reflect realistic growth patterns. Unfortunately, realistic growth data was not used.

LA-5

LA-9

LA-7

IN-6

Fis/Ed Task Force work clearly identifies that 14 centers as described in the SEIS will not be built in 20 years.

Based on the proposed population and employment targets of jurisdictions, it is doubtful that 8 centers will build out in 20 years;

The data set for the Magnets Alternative provides no clear idea of the growth pattern.

The SEIS fails to utilized important information and studies which are current and relevant to this analysis.

LA-6

FisEd Task Force's Case Studies are not utilized;

Water Section is based on the 1985 Seattle Water Supply Plan instead of the 1993 plan (which has been out for over 10 months).

The failure to use realistic growth assumptions and current information means that this Draft SEIS not only does not provide adequate information on the alternatives; more importantly, it cannot provide meaningful information upon which to base a preferred alternative. The final SEIS needs to provide substantive information on the policy direction and financial resources which will be needed to support likely levels of growth outside centers.

The SEIS has an underlying pro-centers slant which appears to pre-judge impacts without substantive analysis.

LA-13

The SEIS Executive Summary critiques the Fis/Ed's recommendations relating to office parks on the unsubstantiated basis that it will undermine the centers alternatives;

A-1(e)

SEIS assumes that 35 to 65 percent of new growth will be redevelopment despite Fis/Ed work questioning this;

K-2

SEIS consistently refers to centers as being based on high capacity transit; yet, there is no meaningful analysis of the impacts of the failure to construct a regional transit plan on the viability of centers. In fact, lack of rail is not determined to be a fatal flaw in centers development.

The analysis and conclusions in the SEIS avoids the tough questions such as:

SC-1

What are the environmental problems with redeveloping industrial lands and the costs of remediation?

ES-9

How do the problems of crime and human services in denser urban areas affect the ability to create quality urban neighborhoods envisioned in the policies?

A-6

What is the feasibility of developing needed new water sources to support economic development in the next 20 years?

What are the costs and feasibility of making urban centers attractive and inviting?

Finally, the SEIS fails to address the most fundamental questions:

What is the likely outcome of amending the CPP's to designate a certain number of centers?

LA-10

If the urban centers do not "build out" in 20 years as described in the SEIS, but in fact only achieve the modest residential growth committed to in the jurisdiction's targets, how viable are the centers? Where will the growth then go? What are the environmental impacts of this scenario?

LA-34

What adjustments need to be made in the centers strategy or criteria, and countywide infrastructure investment policies, if non-center cities do not curtail jobs and housing growth in order to focus growth into centers?

EC-2

Do these policies ensure appropriate locations to attract and maintain high wage/high value jobs such as those supplied by Boeing and Microsoft?

LA-4

What is the likely result of providing only 125% of land capacity to projected demand over 20 years?

We urge you to require that the Final SEIS do the following:

- A) Provide analysis on realistic data assumptions and current information;
- B) Develop a preferred alternative based on new analysis;
- C) Reevaluate the analysis on office parks and redevelopment; and
- D) Address the tough and fundamental questions asked above.

The CPP's as a vision for the next 20 years will direct us to somewhere - the question that the Final SEIS needs to address is: what is the likely outcome of each of the alternatives in 20 years - what are the environmental impacts - and what opportunities are opened and foreclosed?

2/24/94 hardun2/

February 23, 1994

TO: Lisa Majdiak, Planning & Community Development Division

FROM: Fis/Ed Task Force
Paul Barden, Co-Chair

RE: COMMENTS ON THE COUNTYWIDE PLANNING POLICIES DRAFT
SEIS

February 22, 1994

FISCAL ANALYSIS & ECONOMIC DEVELOPMENT (FIS/ED) TASK FORCE
COMMENTS ON THE DRAFT SEIS ON THE COUNTYWIDE PLANNING POLICIES

DRAFT

The Fis/Ed Task Force has been directed by the GMPC to make recommendations on Economic Development Policies and to oversee the Fiscal Impact Analysis of the CPP's. As part of its work program, the Fis/Ed Task Force has been actively interested in the activities of other growth management studies, and particularly the work on the SEIS. The SEIS is an important tool to be used in reviewing the centers strategy for countywide growth and, in particular, for evaluating the urban centers, manufacturing/industrial centers and economic development policies. As such, the Fis/Ed Task Force assigned a committee to organize a systematic review of the Draft SEIS by Task Force members. The comments made by individual members as part of the systematic review are attached. These comments are listed under the names of eight chapter coordinators. In addition, individual members of the Task Force gave testimony on the draft to the King County Council on February 9, 1994. Written text of some of the oral testimony statements are included.

The Task Force has not made formal findings on the Draft SEIS, nor did it take formal action on the comments made by the individual members.

Chapter 1. LAND USE

- LA-13 1. P. xvi Answer: 2. The SEIS critiques the FIS-ED's recommendations relating to office parks on the basis that it will undermine the outcomes of the Centers Alternatives and the CPPs. It is unclear what is meant by this statement. Clearly the FIS-ED concluded that it is essential in order to attain the economic development goals of the CPPs. If the statement is intended to mean that the targets for Centers are unlikely to be achieved, the case studies suggest that these targets are unlikely to be achieved even if the original CPPs are not revised in any way. Thus this statement needs clarification. (Taylor Washburn)
- LA-1
LA-2
LA-3 2. P. xvi Answer-3: The work of the Fis-ED has questioned the shaky assumptions underlying the conclusion that there is adequate land capacity under current zoning for residential, commercial and industrial growth. It is not clear that the SEIS drafters have taken this information into account. Moreover, if the projected density for Centers is unlikely to be achieved, as recent data suggests, then it is further questionable whether existing zoning provides adequate capacity. (Taylor Washburn)
- LA-4 3. P. 14 Land Capacity: This discussion factors in the 25% cushion required, but again suffers from not incorporating the recent data which suggests the residential targets are unlikely to be achieved in most Centers. (Taylor Washburn)
- LA-35 4. P. 15 Rural Cities: My understanding of the Magnet Alternative makes me question the accuracy of the statement that all alternatives contemplate a similar level of development in rural cities. Further explanation would be helpful. (Taylor Washburn)
- LA-9 5. P. 16 Residential Lands: Trend toward lower density housing. This trend is very inconsistent with the ambitious goals in the Centers targets. At a minimum, it suggests the need for continued analysis of the residential preference issue. The raw data gathered by the City of Seattle's Planning Department provides further evidence that absent some sweeping perceived progress in crime and schools in urban areas, the goal of increased residential density in urban centers is unlikely to be achieved. (Some Fis-Ed members who have carefully reviewed this data have criticized the Seattle Planning Dept.'s more optimistic conclusions on this study as being unsupported by the evidence in the raw data.) (Taylor Washburn)

- 3 - (b)
1 - (d)
- 6 P 18 Urban Area: I have not reviewed the specific data provided by the City of Seattle to the SEIS drafters. Recent calculations of what would actually be built based on the statement that Seattle can accommodate one-third of the available urban residential capacity suggests that, while perhaps technically true, the use of this capacity seems very unlikely to be achieved due to the resulting radical change in the character of individual neighborhoods (e.g., ten additional 10-story residential buildings and four 20-story office towers added to the University District to attain projected residential growth) (Tayloe Washburn)
- 1 - (b)
1 - (e)
- 7 P 18 Urban Area The FIS-ED work has long ago provided a host of reasons questioning the accuracy of the assertion in the SEIS that 46% of the unused commercial and industrial capacity can be found in Seattle. (Tayloe Washburn)
- A-6
- 8 P 19 Urban Growth Areas. The feasibility of the Centers concept is undermined by the recognition that only one center now meets the criteria for both employment and jobs. The recent data produced outside the SEIS and the Case Studies Report both add further doubt as to the likelihood of the nominated Centers attaining their stated goals (Tayloe Washburn)
- A-6
- 9 P 21 Significant Impacts - Land Capacity The SEIS properly notes the major factors that are not taken into consideration throughout the document (e.g., feasibility and fiscal impact). Thus, the work of the Fis-ED Task Force, which focuses on these two areas, must be taken hand-in-hand by GMPC policy-makers when reviewing the CPPs and considering revisions. (Tayloe Washburn)
- A - 1(a)
A - 1(e)
- 10 P 22 Uncertainty on Redevelopment and Likely Density of New Development: The fact that the SEIS does not give any careful scrutiny to the redevelopment expectations submitted by cities such as Seattle undermines the reliability of its conclusions. For example, Seattle's projections on industrial capacity apparently assume some reliance on multi-story industrial development. Even the City of Seattle Industrial Study identifies the novelty and untested nature of this form of development. There is no showing in or outside the SEIS that the businesses are likely to site in these areas. Here again, the SEIS stops short of sermonizing the feasibility of the redevelopment assumptions. The Fis-ED work has questioned how likely it is businesses will seek to deal with the host of cost, contamination, and delay issues associated with redevelopment. (Tayloe Washburn)
- A - 9(a)
- 11 P 24 In summarizing the impacts of compact urban areas, the SEIS fails to acknowledge (by its own admission) the significant possible adverse economic impacts associated with such development. (Tayloe Washburn)
- A-9
- 12 P 29 The SEIS does not anywhere try and picture what will be the form of development. When discussing residential development of 30 units per acre, possibly quantifying this in terms of the number of 20-story residential towers or some other example would be helpful. The importance of this is to communicate in terms that policy makers can easily understand the actual development projected under the various center alternatives. (Tayloe Washburn)
- A-13
- 13 P 33 The inflated assumptions of manufacturing and industrial jobs needs to be clarified. As I understand it, PSRC and national data suggest a likely much smaller role in this area. As it involves

considerable consumption of land, policy makers should be made more aware of the optimistic assumptions made in this area. (Tayloe Washburn)

- LA-1(a)
LA-1(e)
- 14 P 33 Seattle's reliance on multi-story buildings for future industrial development is addressed above (Tayloe Washburn)
- LA-13
- 15 P 33 In discussing the City of Seattle's aversion to Business/Office Park and their threat to Center development, the document should provide a clearer picture of how dense 50 jobs per acre will be outside of the CBD and University District. This will be important information for policy makers, especially when companies such as Boeing and Microsoft have repeatedly stressed their unwillingness to site future facilities in such areas. (Tayloe Washburn)
- LA-6
- 16 P 36 In discussing the impacts of the 8 Centers Alternative, greater attention must be given to the recent Fis/Ed staff analysis which questions the extent to which future household and employment will in fact take place in Centers (Tayloe Washburn)
- LA-9
- 17 P 36 In describing the impact of infill and redevelopment, I again suggest depicting this in the visual terms discussed above. (Tayloe Washburn)
- LA - 1(a)
LA - 6
- 18 P 37 RTP Assumption: It is unclear if the SEIS states what the impacts of the 8 Centers Alternative will be if the RTP does not go forward. There should be discussion of these impacts since it is not clear that the RTP will be built. (Tayloe Washburn)
- LA-1(e)
- 19 P 57 The discussion of linking CIP planning to capacity assumptions is critical. In Seattle for example, the ambitious plans to attract large numbers of jobs and residents have to date been unaccompanied by specific information on the cost of such growth, and on whom these infrastructure costs will likely fall. (Tayloe Washburn)
- 20 All the alternatives rely to significant extent on the redevelopment of existing industrial and manufacturing sites to achieve higher employment densities. This is particularly true of the 14 and 8 Urban Centers alternatives. Yet little attention has been paid to the issue of state labeling of hazardous and contaminated sites in relation to the feasibility of this redevelopment strategy. Thus far 68 sites within King County have been put on the state's list. Thus far 68 sites have been tested! This would indicate the distinct possibility that literally every industrial and manufacturing site within the county could end up on this dreaded list. It is simply a matter of how long it takes the state to complete all the inspections. Once a site is on this list it, at best, may be allowed to continue functioning in its current use and at current levels. At worst the site may become totally unusable for any purpose. Financial institutions are unlikely to want to participate in funding for redevelopment of Hazardous or Contaminated Sites. Potential buyers and developers are not likely to be enthused by the prospects of involvement with these properties. This is a very serious problem that needs to be specifically addressed in any plan that relies heavily on redevelopment as a planning strategy. How does the GMPC intend to approach this issue? (Terry Seaman)

A-13 21. A related matter involving the reliance on redevelopment to meet planning goals is the extreme difficulty, hazardous and contaminated sites aside, that companies face in today's regulatory climate if they must relocate even under the best of circumstances. In the past, though to a lesser extent than currently envisioned, redevelopment has played a significant role in expanding our economy and providing additional jobs. However, it used to be a lot simpler to relocate a small industrial or manufacturing business. Now it can take years and many tens of thousands of dollars in legal fees just to move a few miles down the street. Consequently, these types of businesses may resist the prospect of relocation with some vigor. This issue is not addressed in the S.E.I.S. (Terry Seaman)

A-1(e) 22. Please consider the implications of both the above issues relating to redevelopment in the context of the following assumption, relating to the 14 Urban Centers Alternative, taken from page 23 of the DSEIS "

LA-6 "For both residential and commercial/industrial uses, 35 to 65 percent of new development will be redevelopment." (Terry Seaman)

A-6 23. The DSEIS acknowledges (page 19, lower right hand corner) that "None of the areas proposed to be urban centers in the future currently meet the urban center criteria for both employment and housing with the exception of the University District in Seattle." In general that only one of the 14 proposed centers is in fact now an urban center would seem to cast some doubt about the feasibility of the urban concept. In specific, that the only proposed urban center thus qualified is the University District, an almost entirely taxpayer subsidized city within a city, provides some indication of just how likely (or unlikely) urban centers will be to contribute positively to our overall economy. (Terry Seaman)

24. Page 47 of the DSEIS states that "Of particular concern currently to rural area residents is the absence of fire flow in their area because urban levels of water services are not provided." This is a remarkable statement and does not represent the sentiment of the great majority of rural area residents. These folks are well aware that, as desirable as fire flow capacity in itself may be, any imposition of such requirements on rural areas will result in the following undesirable impacts:

- Private and small group wells will be a thing of the past.
- Public water will, at great expense, (remember the current low densities and large lot sizes and how that will affect installation costs) replace those individual and small group wells.
- Extreme pressure to increase population densities in order to pay for the public water system will result in the loss of rural character and lifestyle that most residents so vigorously want to retain.

LA-15 The above referenced statement relating to rural fireflow is not accurate and should be removed from the final SEIS document. (Terry Seaman)

LA-9 25. The DSEIS acknowledges that none of the proposed "centers" meet the qualifications for a center today. The planning policies, however, are designed to direct growth into areas that will either become "centers" during the 20 year planning cycle or will be appropriate places for the development of "centers" at some near or distant future time. The only significance of when a center meets the criteria which we now use to define a center is measured by the extent which the comprehensive plan relies on that timing. A wise plan will be built on the best possible estimates as to when each "center," will reach "centerdom," but will contain sufficient flexibility to accommodate each center reaching centerdom in substantially more than (or less than) the current 20 year planning period. (Larry Smith)

LA-6 26. As the DSEIS states, it is not a feasibility nor a fiscal impact study. The FIS/ED Task Force has been given the job of rendering an opinion regarding feasibility and fiscal impact. Accordingly, the input from the FIS/ED Task Force should act as an additional guide to the county decision-makers. (Larry Smith)

LA-1(e) 27. The conclusions in the DSEIS regarding land availability appear to assume that substantial redevelopment can and will take place within the urban areas. It has become clear that such redevelopment can only proceed if significant reform occurs in how government treats redevelopment efforts, including most specifically contaminated sites. Without such reform, the assumptions are flawed. Nevertheless, this is not a flaw in the center strategy, but rather a challenge to be overcome as part of the implementation of that strategy. The alternative to "redevelopment" is to leave underdeveloped, contaminated or inappropriately developed land in its current state, allowing the uses of that land to continue to deteriorate and requiring new uses to locate farther and farther into the city's environs. While such an approach may be acceptable in Dallas, where flat, developable land surrounding the city is nearly limitless, it is simply impossible to carry on such an approach in the Puget Sound region. In consequence, redevelopment must occur and will occur. The question then is not "whether," but "when" and "how." (Larry Smith)

Chap. 2. AFFORDABLE HOUSING:

HO-1 1. The discussion in the Draft SEIS is vague and rambling. Most disturbing is the lack of specificity in identifying significant, probable impacts of the various alternatives on housing in general and on affordable housing in particular. Since one of the major purposes of the SEIS is "To ensure that citizens and decision makers are provided with objective information and analysis before amending the previously adopted CPPs", a fuller and richer analysis of probable impacts is in order. Although there are challenges and complexities of attempting to predict and measure the relative effects of each of the alternatives on the housing market, a clear, unambiguous and relevant distinctions can be made among the center alternatives. (Dan Watson)

HO-2 2. P.59 The primary finding that "Distinctions in impacts between the alternatives are minor because of the far greater importance of market factors, including demand and supply factors," is an unsupported assertion that flies in the face of both the case studies and most of the testimony our task

force has heard over the last year. While it's obvious the authors of the draft SEIS were unable to make meaningful distinctions between the center alternatives, there is strong evidence that policies mandating the densification of housing in and around urban centers will have significant unavoidable impacts on the amount, type and cost of housing that is ultimately supplied by the marketplace. The authors of the draft SEIS imply that the various policy alternatives have only minor, nearly insignificant, relative effects on the supply and cost of housing. This absurd conclusion suggests that housing market forces, along with other externalities, are so overwhelming that policy choices, particularly those relating to development densities, have no real effect and the contentious debate over density alternatives is really a waste of time. (Dan Watson)

- HO-2 3 The authors of the draft SEIS have simply dodged the essential question by making the bold finding "Market forces have significantly greater impact on costs and affordability than housing policies." While this statement is an obvious truism, it is totally incorrect to therefore assume that housing policies have no significant impact. The real questions that need to be analyzed in the draft SEIS are:

- HO-5 A Given what is known about population growth and the projected demand for housing in the region, what relative impacts will the various alternatives have on the quantity, type, location and cost of new housing supplied by the marketplace?
- HO-3 B How do these impacts on the supply of new housing effect the cost of housing and availability of affordable housing in the overall housing market?
- HO-11 C How do these impacts effect the cost of housing and availability of affordable housing in the Urban Centers or other areas of high growth?
- HO-10 D Do these impacts necessitate mitigating measures in order to insure an adequate supply of affordable housing? How effective and what are the public and private costs of these mitigating measures? (It seems useless to discuss mitigating measures such as inclusionary zoning unless their impacts can be also be assessed in terms of effectiveness and cost). (Dan Watson)

- HO-5 4 Providing answers to these questions is without question a challenging and complex analytical endeavor that may very well be beyond the scope of the SEIS and the expertise of its authors. Based on the information in the draft SEIS, a more intellectually honest "Finding" would be to state that the information to measure the relative impacts of the various alternatives does not exist and therefore no conclusion as to significance can be reached. This would at least acknowledge the possibility of significant differences in the supply and cost of housing among the various alternatives. (Dan Watson)

- HO-1 5 P.64-69 While this section makes a number of interesting points about housing economics and discusses in general terms each of the alternatives, no definitive conclusions are ever reached. I was struck by the vague uncertain nature of the discussion and its avoidance of strong conclusions or definitive statements. For example, the authors couldn't really make up their minds whether and under what circumstances densification increases or decreases housing costs:

"The impact of the difference between eight and fourteen centers might move costs in either direction. Since the 14 Centers Alternative increases the number of areas of concentration considerably, if actual densities are sufficient, this alternative might ease any tight supply conditions and thus allow prices to stabilize or decline. However, this alternative concentrates the most households in areas where land prices might be highest." (Page 67)

Although I have some fundamental disagreements with parts of the analysis in this section, it's not worth debating here since no firm conclusions are ever reached in the draft SEIS. (Dan Watson)

- HO-10 6 Mitigation Measures P.69-71 This section catalogs various regulatory, administrative and financial assistance programs that are believed to mitigate the adverse effects on housing affordability of several of the alternatives. Many of the programs will have so little mitigating effect on housing affordability that they hardly seem worth mentioning (e.g. Minimum Density Zoning, Inclusionary Zoning, Additional Assistance to Small Communities). I do believe that an expanded discussion of public subsidies is in order since the provision of affordable housing within the Urban Centers will necessitate large public subsidies. Given current housing costs and prices, it is not difficult to estimate an approximate public subsidy cost for providing a reasonable mix of affordable housing units within an urban center. The impact on the taxpayer could be quite significant and consequently bears more analysis and discussion.

I find this section somewhat ironic and contradictory because on the one hand the draft SEIS suggests that regulatory policy has no significant overall effect on housing affordability, yet on the other hand other housing policies are, both needed and effective in mitigating adverse impacts for some of the alternatives.

Conclusion:

HO-1 I would recommend a complete rewrite of the "Significant Impacts" and "Mitigating Measures" sections of the Affordable Housing Chapter in order to achieve a consistent and cohesive analysis of these topics as they relate to the various CPP amendment alternatives. (Dan Watson)

- 7 The DSEIS acknowledges that the factors which produce or preclude affordable housing are too complex to allow reasonable prediction regarding the impact of each alternative. While it is true that densification, for example, will no doubt raise the price of land in urban centers, it is also true that the price of each unit of housing in a newly densified urban center is likely to be lessened by virtue of the more efficient use of the expensive land. Similarly, while regulations and incentives to build multi-unit housing in certain areas of the city will have the effect of raising the costs of single family homes in those areas (due to the pressure to replace those homes with more lucrative multi-family developments), the preservation of single family neighborhoods made possible by densification elsewhere will relieve such pressures for other parts of the city. The result of all of this will be that the cost of some types of housing in some locations will rise while prices may remain the same or even fall for other housing types or locations. (Larry Smith)

Chapter 3. TRANSPORTATION

- 1 Which came first THE PLAN or THE CHOO CHOO? Reading the Countywide Planning Policies and listening to the supporters of that vision one might come to the conclusion that King County's Growth Management strategies are simply an after the fact justification for a very expensive mass transit project. Rather than a transit system that responds to the needs of citizens and businesses it seems we are trying to develop a scheme that will, by dramatically shifting our way of life, fit a predetermined vision for mass transit. (Terry Seaman)
- 2 Over the past several decades public transportation in King County has not proven particularly successful. Very few people utilize the system. It has not been able to respond effectively to the needs of its prospective customers. The percent of use of public transit as a means to get to work has decreased over the past decade (Table 5, page 76). Metro's normal response to lack of ridership has been to raise fares and cut service. Apparently that strategy has not solved their problems. Now we have a terrific new idea "Transportation Demand Management" or, as it is known to transportation aficionados, "TDM". TDM is a swell series of disincentives designed to force people out of their automobiles through such means as excessive parking charges, added parking taxes, and higher fuel prices. I suggest that it's about time to try to give people some positive reasons to choose our transit system over other transportation alternatives. I also suggest that prior to initiating a new transit project costing tens of billions of dollars we should prove to the public that we can first fix our current more modest public transit services, making them an attractive alternative for commuting. The proof of our success will be increased ridership and possibly eventual public acceptance of the ambitious plans of the R.T.A. The King County - Metro merger seems to be the perfect opportunity to focus attention on our existing transit system. Only after we have learned to make it more successful will we have the knowledge and public confidence necessary to ensure the utility of the massive regional system envisioned by planners and leading politicians. (Terry Seaman)
- R-2 3 The specific message here in terms of the Countywide Planning Policies and the DSEIS is DON'T BUILD OUR ENTIRE GROWTH MANAGEMENT PLAN AROUND THE CONCEPT OF A FUTURE MASSIVE REGIONAL TRANSIT SYSTEM WHEN WE CURRENTLY LACK THE ABILITY AND KNOWLEDGE TO MAKE OUR EXISTING, MORE MODEST SYSTEMS EVEN marginally effective. (Terry Seaman)
- 4 Much of the analysis of the relationship between the currently-proposed RTA and the CPPs suffers from too much emphasis on the short term and too little emphasis on the long term configuration of the region. East-west movement in the county has been substantially advanced with the dramatic expansion of I-90. There will soon come a time, if it hasn't occurred already, where the region can no longer solve its ever increasing congestion problem by building more freeways. Even Los Angeles, which for decades has been acknowledged to be too spread out to ever justify a mass transit system, is turning to transit. The critics of the RTA may be correct in contending that this is the wrong plan or the wrong time (although it is interesting and instructive to listen to Dan Evans' observations regarding the kind of paid-for transit system we would have today had the forward

thrust bond issue passed), it is clear that this region will not continue to thrive without some sort of mass transit alternative at some point in the future. The point is that we should be making land use decisions today that facilitate the construction of the mass-transit system when the region's voters finally decide that the congestion and the resulting economic stagnation justifies the price tag. The centers-based policy alternatives as set forth in the CPPs are the only alternatives that do that. (Larry Smith)

Chapter 4. HUMAN SERVICES

- IS-4 1. The SEIS concludes that the alternatives that propose to concentrate growth into designated urban centers would result in fewer impacts on the delivery of human services in rural and resource areas (page 102, Main Findings). This of course assumes that new residential growth will occur in the areas and proportions envisioned by the planners, and that such a result would minimize residential growth in the rural areas. It also apparently assumes that the increased funding required to provide human services in the urban centers and surrounding urban areas would not result in pressure to decrease funding for those services in the rural areas. (Terry Seaman)
- LA-6 2. The projected characteristics of employment opportunities in the Urban Centers indicates an increase in lower paying service sector jobs that may not be self-sustaining. This will result in an increased per capita demand for human services, not necessarily in the Urban Centers but rather wherever, in the county, these new lower pay residents and their families determine to live. Increased demand and need for human services will result in increased per capita costs for human services. Will jurisdictions have the resources to pay the bill? (Terry Seaman)
3. There are those who believe that centralization or "recentralization" are the solutions to the problems that have faced our central cities ever since the post-war invention of the subdivision caused the middle class to separate itself from the city and from one another. See, for example, "Recentralization: The Single Answer to More Than a Dozen U. S. Problems and the only Answer to Poverty," William B. Shore, 1993, a paper for the Lincoln Institute of Land Policy. Mr. Shore is now a Senior Fellow of Urban Affairs at the Regional Plan Association in New York. Mr. Shore's thesis is that the centers of American cities must regain their role as the principal places where people come together for work, retailing, the arts, higher education, health services and entertainment. Such a recentralization will do more than anything else to end the apartheid that has caused class and racial separations in our communities, as well as the economic decay of the central city. (Larry Smith)

Chapter 5. POLICE/FIRE/EMERGENCY RESPONSE

- IS-4 1. The DSEIS fails to effectively address the issue of law enforcement costs related to the greatly increased population densities envisioned by planners. A feeble attempt is made on page 109 to

discount the effects of density on crime by alleging that "previous research" indicates no strong conclusions can be drawn. Tell that to inner city residents being terrorized by gangs and drug dealers or who need security system for cars, parking and residences. (Terry Seaman)

Chapter 7. PARKS AND OPEN SPACE

- 1 The DSEIS concludes that the 14 Urban Centers Alternative would have the least adverse impact on countywide park, and open space, though it acknowledges that this option will result in more adverse impacts to urban parks and open space within urban areas. If the Urban Centers concept is to work (regardless of whether it is the 8, or 14 Center alternative) it is very important that Urban Centers be attractive and inviting to residents and workers. Numerous, appealing and well maintained park and open space areas will be essential to this goal. The cost involved in maintaining and enhancing existing urban assets and in developing new Urban Center park and open space sites may be substantial, but that investment will be a necessary component to make the Urban Centers concept work if that is the preferred alternative. (Terry Seaman)

Chapter 8. Water Supply:

- IS-6 1 This chapter needs to state more forthrightly that new water sources will be needed to support economic development strategies and continued population increases from internal growth and immigration no matter how successful we are at conserving water as the next source of "new supply." Although sound policy, conservation is a stop-gap measure to give us the time, 15 to 20 years, to find, plan, allocate, and build a new source. No matter how the population is arranged on the King County landscape, a new major water source is needed. We are not deferring a decision to build new sources by the use of conservation. We are doing all things possible to stretch our current supply so King County residents can continue to maintain their current lifestyle with a minimum of sacrifice. (Holly Kean)
- IS-10 2 King County has long had a policy which discourages the extension of major utility infrastructure into rural areas unless a water quality or supply problem is identified. This is buttressed by code language which puts teeth in the policy. To my knowledge, there are few, if any, problems implementing the policy. I am puzzled by several references to the possible need for major improvements to the rural utility system infrastructure. King County policy translates to individual homes on a well or lots created by shortplat or small subdivisions being served by a well(s). If major infrastructure improvements are needed in rural towns or cities, the SEIS should be more precise. (Holly Kean)
- IS-11 3 Class A water systems contain 15 or more connections; Class B systems contain 2 to 14 connections. (Holly Kean)

- IS-8 4 The references to the 1985 Seattle Water Supply Plan on page 126 are out of date. The situation is now quite different. The discussion should be based on the 1993 Seattle Water Supply Plan. (Holly Kean)
- IS-12 5 In addition to conservation, individual utility exploration, and the potential of the North Fork of the Tolt River, the Seattle Water Department and the East King County Regional Water Association are exploring the possibility of locating a major regional groundwater source in the Upper Snoqualmie Valley. Application has already been made to the Department of Ecology to drill an exploratory well.

The proposed intertie between Tacoma Water and the Seattle Water system from Pipeline 5 should be discussed as another source of water. The quantity, however will not be known until Tacoma completes its negotiations with the Muckleshoot Tribe. And, if construction is not begun on Pipeline 5 by 1996, it will put additional stress on the Seattle Water Department system as many of the South King County purveyors rely solely on groundwater. Cities such as Federal Way do not have a surplus water supply unless Pipeline 5 is built. (Holly Kean)
- IS-13 6 I agree that construction of more multifamily development will reduce water supply needs. However, the reduction should be quantified because I don't believe it will be significant. (Holly Kean)
- IS-14 7 The concentration of growth will not necessarily have much impact on the need for new water sources. It will, however, have an effect on infrastructure needs. Infrastructure needs and source needs should be discussed separately. (Holly Kean)
- 8 The SEIS should emphasize that a change to policy RU-16 is needed if we are to build new supplies. Public facilities for these new water sources will have to be constructed where the water source is located. The Cedar River system, constructed at the turn of the century, was built in the hinterlands because that was the location of the source. I do not know of any major regional sources which could be developed in the urban areas. (Holly Kean)
- IS-15 9 The reuse of treated wastewater should be included as a potential new source of supply. Although I do not believe it is a viable source because King County does not have many large, single users for the treated wastewater, it is part of the water supply scheme. Unlike Pierce County which has the Simpson Kraft Mill using at least 8 MGD. King County has small users by comparison. The construction of a distribution system would be very costly because of the lack of concentration of large water users. Use of the system would be for only 2 to 3 months out of the year. It is also unknown if treated wastewater substituted for potable water to flush the Hiram Chittenden Locks can increase our water supply. The Department of Ecology may decide the saved water is needed to enhance the instream flow in the Cedar River. (Holly Kean)
- IS-16 10 There was no discussion of groundwater as an important source of water for King County. Groundwater supplies 22 percent of the urban population. This source needs to be protected from contamination and the reduction of the urban aquifer recharge areas by inappropriate placement of high density development. (Holly Kean)

11 What is the rationale behind CO-16 requiring Rural Water Systems to be "professionally managed and maintained by the applicable water purveyor according to the satellite management procedures of the Coordinated Water System Plans, and designed to rural standards."? Why does the Suburban Cities Association, which has no direct concern in this matter, feel so strongly that this policy, which will needlessly cost residents with individual or small group wells in the rural unincorporated area of the county thousands of dollars apiece on a yearly basis, must be retained over the more reasonable version (RU-14) put forward by the Rural Character Task Force? (Terry Seaman)

12 If retained, CO-16 will result in extreme and needless economic hardship on rural residents who are already underrepresented in the Growth Management Planning process. It will prompt the incursion of public water districts into the rural areas where the GMPC allegedly does not want them, (rural residents don't want them either) and it will most certainly, along with public waterlines result in additional, even insurmountable pressure to increase densities in the rural areas where, again the GMPC claims it wants to minimize densities. (Terry Seaman)

CHAPTER 9. Stormwater Management

1. The value of stormwater runoff has increased among groundwater purveyors. They believe the current policy of capturing runoff and channeling it into water courses should be reviewed for a more balanced approach. Twenty-two percent of urban King County's population uses groundwater as its only source. Runoff helps recharge aquifers. (Holly Kean)

2. Amount of Stormwater Runoff:

NS-22 The assumption in the SEIS is that the Centers Alternatives will categorically have less impact on the production of stormwater runoff since most of the development will occur inside the UGA. However, in the Land Use section on page 16, the SEIS states that there are 40,000 vacant acres in the UGA. Most of those acres will be consumed to accommodate the 215,000 additional households. TS-17 Wouldn't the stormwater generated by covering these acres with impervious surfaces be the same as any other 40,000 vacant acres? If so, would that result tend to neutralize the differences between the Alternatives? (Wally Toner)

3. Jurisdiction's Plans:

Mention is made of King County's SWM and the City of Seattle DWU. But there is no mention of other cities and their capacity to deal with stormwater. The relative capacity of the region to manage stormwater associated with development is important in designating Centers. (Wally Toner)

4. Center Designation:

To the extent possible, the FSEIS should confirm each jurisdiction's surface water management plans for the Centers anticipated. It has been said that future expansion of the Hutchinson Center will not be possible until the CSO problems in south Lake Union are solved. (Wally Toner)

CHAPTER 10 - SEWER/SEPTIC:

1. On page 142 the SEIS mentions that the capacity for transmission and treatment for the south Puget Sound drainage is under study. Is there the same level of confidence that those studies will result in sufficient capacity for the growth anticipated in the southern part of the county as the seems to be for the METRO portion of the county? (Wally Toner)

Chapter 11. SOLID WASTE

IS-16

1. The SEIS does not mention that Seattle manages its own collection and disposal system. Also, both Seattle and King County are served by regional landfills located in Roosevelt, Washington and Arlington, Oregon. (Wally Toner)

IS-4

Chapter 12. UTILITIES

1. The introduction to the section on Significant Impacts (p. 151) states: "...the more concentrated development in urban areas ... the more efficient and cost effective the delivery of utility services."

"Cost-effective density" has served as an underlying assumption of the GMA planning effort. Based on WNG's research, there is a point at which increasing density increases cost of service, while reducing efficiency.

Although the SEIS did not include cost and feasibility factors in its analysis of the alternatives, it did discuss efficiency of utility service provision. The Eight and Fourteen Center Alternatives were said to have the greatest potential for energy efficiency and positive impact on the delivery of utility services (p. 152).

WNG does not understand how the stated efficiencies are achieved with higher densities. Our experience within our service area indicates that operations and capital costs are the highest in densely populated areas. It costs more to serve gas customers in Seattle than in Bellevue; and more in Bellevue than in Redmond.

The increased costs of density are confirmed by reviewing operations and maintenance costs for natural gas utilities nationwide. Cities with greater populations per square mile, or greater densities, tend to be more expensive places to provide natural gas service. We suspect the same is true for other utility service providers.

To compare natural gas operations and maintenance numbers to consumer costs, WNG reviewed cost of living indicators such as groceries, housing, utilities and transportation. The general trend held. Dense cities like Boston and Washington D.C. were more expensive places to live than Albuquerque and New Orleans. (see attachments) (Gerry McDougal)

Chapter 13. SENSITIVE AREAS & RESOURCE LANDS

- 1 The SEIS finds that many sensitive areas and resource lands are located in rural and resource areas. No kidding. Previously developed land in the urban areas has long since had all the sensitivity and resourcefulness blasted out of it! Nevertheless the DSEIS conclusion that the 14 Urban Center Alternative would have the least adverse impact in this regard seems an accurate assessment. Existing sensitive areas and resource lands are indeed located primarily in the rural areas of the county. Assuming the various alternatives work as envisioned the 14 Urban Center scenario would be the preferred alternative, in the context of preserving sensitive areas and resource lands. (Terry Seaman)

In reality, the Countywide Planning Policies require planning to accommodate the housing and jobs targets. Development to actually achieve the Centers' criteria may take more than 20 years for most Centers." In one short disclaimer, are the two biggest problems relating to the feasibility of the planning process. (Terry Seaman)

2. There are serious questions as to whether urban centers can achieve the job and housing targets. Many of us involved in the process are convinced that the housing targets are simply not achievable in most designated Centers. Some of us doubt the ability of the Centers to meet the employment targets and further question, even if the targets are met, whether some of the types of jobs envisioned for the Centers will allow for self-sufficiency, let alone actually contribute something to the overall economy. If low paying service jobs are to be a significant portion of Center employment the rest of us may end up in effect subsidizing these jobholders through provision of human services and other government programs aimed at low income families. Planners should be focusing their attention on ensuring, to the extent possible, that new jobs will contribute in a positive way to our overall economy rather than simply trying to squeeze in the most possible jobs per acre regardless of the economic viability of those jobs. (Terry Seaman)

EC-3

EC-10

3. This business about how, technically, Centers need only plan to accommodate housing and jobs targets but not actually achieve them within the 20 year planning period is probably the biggest scam of the whole planning process. This technicality is brought up when anyone questions the Centers' housing and job targets. In effect, what's said is that it's not important whether or not the targets are actually met but only that jurisdictions have the required zoning in place. Yet virtually everyone agrees that we have to accommodate approximately 325,000 additional people in King County over the next twenty years and that the planning underway assumes the Centers' targets will be met and does not make any provision for what happens if they are not. For instance, approximately 145,000 people now reside within the geographic areas that define the proposed 14 Urban Centers. The 14 Urban Centers Alternative assumes that nearly 100,000 additional people can be encouraged to reside in those Centers in the course of the next twenty years. Is it a reasonable assumption to think that we can jam that many people into what is by far the most densely developed areas of the county? What about the economic consequences of such an effort? What kind of economic incentives and subsidies would be necessary to make this happen? Can we afford it? (Terry Seaman)

GENERAL COMMENTS

1. The Draft S.E.I.S. proceeds from the assumption that all of the planning alternatives (No Action, 8 Centers, 14 Centers, etc.) could be achieved as envisioned by the planners (Reference page iii of the Executive Summary: "The expected or predicted outcomes of each alternative are based on planning assumptions regarding population and employment growth. Any changes in these assumptions could substantially affect the outcomes." Or page x of the Executive Summary: "For purposes of environmental review, the DSEIS assumes the action called for within the Countywide Planning Policies and the five alternatives can be accomplished, but does not estimate the costs or feasibility of achieving them.") Consequently the DSEIS does not in any way test the feasibility of any of the

Chapter 14. AIR QUALITY

- 1 Many measures have already been implemented at the federal, state, and local levels to improve air quality. The DSEIS accurately concludes however that: "In general, adverse air quality impacts will occur where growth occurs." All the alternatives under consideration assume similar amounts of growth though, of course, the manner in which the growth is handled differs. The DSEIS conclusion that the 14 Urban Centers Alternative is the best alternative in terms of overall air quality is probably accurate though, in general, the differences between alternatives in this regard appear minimal. (Terry Seaman)
- 2 The different alternatives will indeed have an impact on air quality, since the greatest source of air pollution is the automobile and the greatest problem with automobile use is the predominance of single occupancy vehicle travel. The centers alternatives provide the best (the only) alternatives that present a serious opportunity for pedestrian and significant transit use. To the extent that such use is enhanced the increase in automobile use will be slowed. (Larry Smith)

CHAPTER 15 - Water Quality

- 1 The importance of protecting groundwater from contamination should be emphasized as 22 percent of King County's urban population depends on groundwater as its only water source. (Holly Kean)
- 2 Since most of the comparative analysis in the SEIS is devoted to the effects of impervious surfaces and the adequacy of sewer systems, please refer to the comments under those sections. (Wally Toner)

Chapter 18. ECONOMIC DEVELOPMENT

- 1 Page xi of the Executive Summary states, "In order to evaluate the differences among alternatives, the DSEIS assumes that under the 8 Centers and 14 Centers Alternatives, jobs and housing growth will occur in Centers in sufficient numbers to meet Countywide Planning Policies' defined criteria.

planning alternatives by exploring whether or not, and to what degree, the various planning options are realistic expectations of what could happen in the next twenty years. Because it accepts rather than tests these assumptions I find the conclusions that are drawn to be simplistic, obvious and for the most part useless. For instance, the conclusions stated on page ii of the Executive Summary indicating that the 14 Centers Alternative would consume far less vacant land than the Pre-Countywide Planning Policies Alternative and that the other alternatives would fall between these two bookends is abundantly self-evident providing you accept the theoretical premise that the 14 Centers Alternative, and the other alternatives are achievable as envisioned. (Terry Seaman)

2. The question that still remains is this:

Is the GMPC and/or King County intending to provide a mechanism to test the assumptions made by the planners before proceeding with the selection and implementation of the preferred planning alternative? (Terry Seaman)

3. Some of us who have been involved, on an intense but volunteer basis, in the planning process seriously question the assumptions made by planners and the GMPC relating to both population and employment densities in the Urban Centers. I also question the assumptions regarding growth in the rural areas and the assumptions regarding the reliance on public transit systems. It is important that we ultimately work from assumptions that are realistic rather than simply idealistic. (Terry Seaman)

4. Despite the claim, on page x of the Executive Summary, that the economic analysis to be provided by the FIS/ED Task Force will examine costs, "particularly in regard to their impact upon individuals, businesses and the public sector", it does not appear likely this report will in any serious way address that topic except as it relates to the public sector. In other words impacts upon individuals and businesses will be largely ignored. This is due in part to the inability of the county and GMPC to fully fund such an analysis and in part to the lack of will to really address the feasibility of the planner's assumptions and is evidenced by a review of the proposed Table of Contents/Outline of the FIS/ED report. (Terry Seaman)

5. As the proportion of population in the Urban Centers and other urban areas of the county continues to increase over that of the rural areas the already minimal political pressure that residents of the unincorporated rural areas can bring to bear to assert their needs will continue to decrease. In that sense all the alternatives, since they concentrate growth in urban areas threaten the ability of rural residents to have any meaningful form of self-governance or significant input into the local political system. (Terry Seaman)

6. I don't know quite where to put it or how to tie it specifically to the DSEIS but once again I urge the GMPC and King County to give serious consideration to the implications of the possible establishment of Cedar County. I believe that such a new county, in the southeastern portion of King County would increase pressures to develop those rural areas currently of King County, to the extreme detriment of the GMPC Policies aimed at concentrating growth in the urban areas. Also it's about time the GMPC and the county both realize and acknowledge that the past and current handling, and the ultimate results of the county's planning process, have had, and will continue to have, a significant

impact on the ability of Cedar County supporters to gather the necessary signatures for their petitions. In effect, the actions of GMPC is seen as the greatest ammunition for Cedar County supporters since the GMPC is viewed by many residents of the rural areas as totally unresponsive to their concerns and totally outside the scope of their influence. (Terry Seaman)

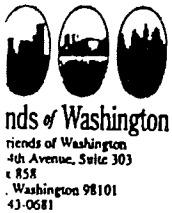
RURAL AREAS

1. To many people in the rural areas of King County growth management, while complex and exciting, is not considered the "healthy process" extolled on page iv of the Executive Summary. This is because rural residents have had no real representation on the 15 member GMPC that consists solely of elected officials. None of those elected officials has thus far shown any real inclination or ability to provide proactive representation for the residents of unincorporated King County. City of Seattle residents are well represented on the GMPC by their own elected officials, likewise the suburban cities have substantial representation by elected officials. Rural residents supposedly must rely on having their points of view advocated by county council members whose districts lie almost totally within the city limits of Seattle. To date the majority of rural area residents would dispute the claim on page v of the Executive Summary that "Thus the GMA is creating a lasting legacy of integrated plans and policies that make sense for the entire region." (Terry Seaman)

Benchmarks

Throughout the DSEIS, benchmarks and monitoring are identified as appropriate and reasonable mitigating measures for implementing the Countywide Planning Policies (CPPs). It is Fis/ED's view that there is enough uncertainty associated with implementing a new land use vision that it would be irresponsible to move forward without a commitment to benchmarks and monitoring. Therefore, we recommend that King County jurisdictions develop a process for setting and monitoring benchmarks for the CPPs. An early and clear commitment to this process on the part of elected officials will do much to lower anxiety levels associated with the implementation of a new land use vision. To initiate this process, Fis/ED is forwarding a list of economic development indicators, and recommended next steps to the GMPC for their consideration. (Fis/ED Task Force)

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FEB 28 1994

PCDD

February 28, 1994

Mr. Jim Reid, Manager
Planning and Community Development Division
King County Parks, Planning and Resources Department
707 Smith Tower Building
506 Second Avenue
Seattle, WA 98104

Re: Draft Supplemental EIS for the Amendments to the
King County Countywide Policies

Dear Mr. Reid:

1000 Friends of Washington is a statewide citizens organization dedicated to achieving livable communities, promoting a vital economy, and conserving Washington's rural and resource lands through sound growth management planning. We offer the following comments on the Draft Supplemental Environmental Impact Statement for the Amendments to the King Countywide Policies (SEIS).

1. Urban Centers

There has been a great deal of confusion and misunderstanding of the centers concept. We believe that urban centers are intended to have a mix of housing types, including mid-rise and garden apartments and townhouses. Experience in Seattle and other cities shows that, while not for everyone, there are significant portions of the population that are attracted to living in these types of urban centers. The SEIS should examine what the centers are likely to look like at the end of the 20-year planning period, including the mix of housing types that are likely to be located there.

This analysis may reveal that the definition of centers should be refined in order to achieve realistic and livable housing goals. One alternative would be to establish a housing density within the centers that is more consistent with the definition in the Vision 2020 plan. It may be easier to attain affordable housing within the centers if the geographic size of the centers were not so constrained or if some of the housing were to be located on the fringe of the center. Land prices may be significantly lower in areas that are outside, but within walking distance of the centers as

Mr. Jim Reid
February 28, 1994

Page 2

they are now defined.

2. Land Capacity

The land capacity analysis in the SEIS is the most thorough and detailed analysis that has been done by any County in the state. In addition to that analysis, it might be useful to examine the effect of its assumption of existing zoning. To what extent has the remaining land capacity been underestimated because of this assumption? The SEIS should include an estimate of land capacity that accounts for future up-zonings based on past trends, new information in draft plans, or likely scenarios.

3. Monitoring of Land Supply

The County's urban area must have sufficient capacity to accommodate the next 20 years of population growth. Given the 20 year land supply, the boundary should not have a significant effect on the housing market in the first years subsequent to the establishment of the boundary. If the land supply within the urban growth boundary is monitored, it would seem that the County could ensure an adequate supply of land for housing, commercial and industrial uses. What kind of monitoring program could the county adopt to ensure a sufficient supply of land within the boundary? As part of this program, the County must develop, either as part of the SEIS or the comprehensive plan, measurable benchmarks for urban and rural densities and objective criteria for amendments to the urban growth boundary.

4. Urban/Rural Line and the Centers Concept

The County's urban growth area is the primary tool to reduce sprawl development and to conserve rural lands. The location of the line should not be exclusively linked to the centers concept. Analysis shows that the County can accommodate the next 20 years of growth within the urban/rural line even if the centers are not entirely built out within the 20-year planning horizon.

As the County refines the definition of the centers, it should develop a more clearly defined land use strategy for the non-center urban areas. This strategy should be aimed at promoting compact development that will reduce vehicle miles travelled and will combat sprawl.

LA-1(g)
LA-2
LA-3

LA-4

LA-9

10-11

Mr. Jim Reid
February 28, 1994

Page 3

5. City Comprehensive Plans

DN-2
LA-2
-A-9

The SEIS should examine how the currently completed city comprehensive plans relate to the land use alternatives. The centers concept may be further refined by the land use plans that have already been adopted -- such as Bellevue and Renton -- and the plans that are nearing their final stages. Are the cities developing land use plans that can accommodate their projected population targets? How do the urban centers as defined in the city plans compare to the concepts in the Countywide Planning Policies?

Conclusion

As the County refines the SEIS and develops a preferred alternative, we should not lose sight of our overall vision for the region. That vision of compact urban development and the conservation of rural King County has widespread support throughout the community. We should not accept sprawl development patterns simply because that is what the current market knows best. The citizens of King County deserve better. The growth management work that the County has done thus far provides a good foundation for refining that overall vision.

Sincerely,

Eleanore Baxendale

Eleanore Baxendale
Executive Director

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FEB 25 1994
PCDD

TO: King County Planning and Community Development Division

RE: Draft EIS for Countywide Planning Policies

I believe it would not be in the public interest to keep the urban boundary closed. There are already infrastructure in place that are not being used to full capacity in Seattle, Bellevue, Federal Way, and other urban centers. And to mention how it would take the downtown business and industrial base in these cities. While they are building schools on the plateau the schools on the lowland are suffering from low enrollment. Obviously these centers won't develop in the same sense of density, but why should they? With some refinement the urban centers plan can work. We have adequate capacity for growth and do not need to consider master planning communities on the urban fringe. Communities like Meyersdale and Maple Valley belong are not in the least bit irrelevant in the concerns of the people who live here. We know this area and the most environmentally conscious people in the U.S. and the King Co. Council needs to start to develop boundary lines and identify them. I was born and raised here, but I have lived in Houston, Dallas, Atlanta, and in third world and socialist countries. I've seen cities boom and overbuild so that there were big industrial residential areas and strip malls and tall modern buildings sitting empty. It is not a pretty sight. People had mortgages higher than the market value of their homes.

The EIS says that urban development would have the least impact on our environment. It is true and with it's continuing IT GROW FOREVER. Let the people who choose to live in a rural area do so. Let the rest of us live in urban centers and like to get away to the place and tranquility do so and enjoy the natural beauty of our area. King Co. should be buying up parcels of land when they come on the market to be used as parks and open areas of beauty for everyone to enjoy and save for future generations. In closing I would like to thank you for reading this letter and I hope you really take into consideration the average person and not listen to greedy selfish people.

Sincerely,

Les Baxendale
112 Bernborn
2009 175th Ave NE
Belmont, WA 98004

*Sheldon A. Blue
& Associates, Inc.*

14318 S.E. 49th Street, Suite A
Bellevue, WA 98006-3147
(206) 242-2600/(206) 747-5098 FAX

February 28, 1994

Lisa Majdiak, Growth Management Project Supervisor
Planning and Community Development Division
Parks, Planning and Resources Department
707 Smith Tower Building
506 Second Avenue
Seattle, Wa. 98104

RE: Comments SEIS, Countywide Planning Policies

Dear Ms. Majdiak:

Please accept the following as my comments after reviewing the Planning Policies proposed:

1. There is a lack of critical analysis in the document. There is no fiscal analysis or market feasibility analysis of housing. I could find no infrastructure capacity information nor did I find specific growth targets proposed for each jurisdiction.
2. Urban centers are going to develop no matter what you do. You cannot predetermine a number. Look at the recent study of "edge cities" that have developed in practically all major cities around the country. You can't say that 40% of the population growth will locate in urban centers over the next 20 years. Neither 74% of jobs. Many more people must live in urban areas outside of centers. Utility companies right here in the Puget Sound area have indicated that it will be more costly to provide services into the dense centers. All we will be doing is sending the growth to the other counties due to increased crime, lack of open space and high cost of housing. Right now we are one of the most costly places to build anything in the U.S. A simple mid-rise structure in Seattle costs almost \$10.00 per sq. ft. more than in Atlanta, New Orleans or Phoenix. We still can provide good housing in the suburbs at \$85 to \$100 per sq. ft. as apposed to \$175 to \$200 per sq. ft. in dense centers of Seattle.
3. Critical impacts of "centers" are not analyzed. As above, how does housing in dense centers match what people can afford? Will 75% of the jobs be the kind to fit into an office tower? Our biggest and best job increase was created in suburban parks like Microsoft built. Could the infrastructure stand the population and job growth expected in the centers. How will we accomodate the code and regulatory changes needed for this.
4. The EIS does not acknowledge the critical shortage of non-residential land and the impact of not meeting growth targets is not even analyzed.
5. None of the alternatives in the SEIS provide for an adequate 20-year land supply. Over 60% of our future growth will come from right here; from our children.

Ms. Lisa Majdiak

Page 2

February 28, 1994

HO-3
LA-8
HO-6

Household size isn't shrinking any more, as the study assumes.

Most of our growth will reject living in apartments as I see my own children doing, it is their choice. If we don't provide the land needed our growth will just spill over into other counties just as we have seen it happen over the last three years. Snohomish and Pierce have provided the growth opportunities for housing and even Kitsap and Mason counties have shown the only true growth in the state, because of land availability.

LA-9

What I see is that we must reduce the 20-year targets for centers. The County Council has admitted that and is now looking at 27%. I personally think the number will be 10% at a high. We should use jurisdictional targets rather than the generic one used in the DSEIS. Plan for smaller, incremental changes in density throughout the region rather than big changes in a few spots and identify the schools, parks and transportation requirements needed to serve these targets so that the people will know what can happen.

I don't believe those who thought up the GMA envisioned the manner that this is progressing. As I remember the Act was to have each county see a broad vision of what they wanted to be 20-years hence, just as any good businessman would look at the future of his company. Then plan for small incremental implementation assessing the successes and shortfalls of progress and adjust the plan so that we stayed on tract toward the vision without bankrupting our capacity to accomplish our mission.

Sincerely,

Sheldon A. Blue
Sheldon A. Blue

Copies - Councilpersons

IN-4
N-6a

LA-9
LA-10

CS-4

LA-1
LA-2
LA-3

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FEB 26 1994
FOOD

HO-6

LA-1
LA-10

LA-8
HO-3

February 24, 1994

Ms. Lisa Majdiak
Growth Management Project Supervisor
Planning and Community Development Division
707 Smith Tower Building
506 Second Avenue
Seattle, WA 98104

Re: Comments to Supplemental Environmental Impact Statement (SEIS)

Dear Ms. Majdiak:

As part of the comment period on the referenced document, please note the following concerns and observations for consideration prior to issuance of the final report:

Inadequacy of certain critical analysis.

The report lacks most of the analysis required to make a sound determination of the proper alternative. Specifically, the cost of implementation of the plan is vague and unsupported by solid numbers or common sense. There is no analysis of the availability of infrastructure to support the plan, nor what the cost will be to create the same. The SEIS is devoid of what the current infrastructure capacity is.

Focus is mistakenly put on Urban Centers as the answer to King County's future growth.

The fact is that 40% of the population will not locate in centers over the next 20 years. Moreover, 74% of future jobs will not be located in these centers either. To force people to live in centers then commute to work will only exacerbate the transportation problems. We must plan for more of our growth in urban areas outside of the urban centers. Polls and research support the public's desire to live outside of centers in areas of lower density rather than inside centers of high densities. We should be planning upwards of 90% of projected growth in urban areas outside of centers.

Research shows that it is more expensive to provide services in dense cities than in urban and suburban areas. Both Puget Power and Washington Natural Gas have testified that costs will increase if they are required to provide service to high density areas.

Finally, reliance on centers to handle future growth will send that growth to other counties. Why? Because people prefer to live in low density areas. They are willing to trade off that desire for longer commute times. They cannot and will not be forced to live where they don't want to. Furthermore, the cost of producing high density centers will increase housing costs. The costs of buying out existing

Ms. Lisa Majdiak
February 24, 1994
Page - 2

property owners, increasing infrastructure to handle the density, and the plethora of impact and mitigation fees, will drive housing costs through the roof. These costs will be passed along to the new buyer/renter -- assuming they can be passed along. Again, actual observations show that people will commute long distances to obtain their dream of owning a detached single family home.

None of the alternatives in the SEIS provide an adequate 20-year land supply.

The previous section's arguments point to a need for more, not less, residential land throughout King County. However, the report does not address this. Instead it assumes that the populous will radically change their behavior and choose to live in centers. Worse still, the report covertly infers that they must live in urban centers, as other choices will not be available. This assumption is the core of the report and is blatantly erroneous and dangerous as it will lead the county down the wrong path.

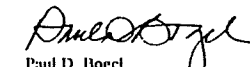
Also incorrect is the assumption that household sizes will be declining rapidly. With over 60% of the county's growth coming from our children, households will grow initially. Families do not desire living in high density, urban centers. They want more open space, low crime and detached single family housing. They will not choose to live in apartments, if they have a choice. If we don't provide a realistic supply of land, our growth will spill over into other counties and people will move to those areas that do provide the housing choices they want.

Recommendations for inclusion.

1. Reduce the 20-year targets for centers to a realistic and achievable number. The proposed densities for the eight centers are unrealistic. Furthermore, the question is never asked: "Who will build this housing?" If this concept were the option of choice by the public, market demand would have attracted builders and developers long ago. The bottom line is that neither buyer/renter demand nor business analysis support the proposed concept as feasible.
2. Use jurisdictional targets rather than the generic one in the SEIS so everyone can understand the consequences. The report talks in broad, general terms without the specifics to back up the opinion. The average person can't successfully absorb the information as presented and reach an informed decision on the plan's impact for their area. The report must breakout the impact of the plan jurisdiction by jurisdiction with specific numbers and analysis that can be measured.
3. Plan for small changes in density throughout the region rather than big changes in a few spots. The impacts will be less, the cost will be less, the public will support it, and the builders and developers will build it.
4. Infrastructure needs must be identified. Schools, parks and transportation requirements should be analyzed and quantified.

Thank you for your consideration.

Sincerely,


Paul D. Bogel
Vice President

ATTEN: CYNTHIA MOFFITT

RECEIVED
FEB 28 1994
PCDD

From: Myrle Bossart
3311 78th Place N.E.
Bellevue, WA 98004
(206) 454-3311

To: Growth Management Project
King County Planning and Community Development
707 Smith Tower Building
Seattle, WA 98104

It is of great concern that in all of your plans there is an omission of the most important element....people planning! I applaud your efforts to plan for the expected growth of King County, but you are missing an opportunity to influence the factor that will ultimately undermine all of your best efforts to maintain quality of life in the Northwest. You could put Seattle on the cutting edge of United States growth management and make us a model for the rest of the country.

Please include in your plans and questionnaires:

1. Statements that will help people address the root problem.
For example:
 - a. How many people should we plan for in 10 years; 20 years; 50 years?
 - b. What is the optimum size of Seattle; King County; Puget Sound Basin?
 - c. What do we need to do to reach and sustain our optimum size?
 - d. What incentives could we use to discourage growth, if our optimum size has been reached or surpassed? (See j on your questionnaire)
2. At least some acknowledgement that any plan will eventually fail if our numbers do not stop increasing.

It is important to note that population control is not an option. We live in a democracy, and must work with education and incentives. Please include population stabilization in your plans for our future. It is not mandated, but it is critical! It will win you respect and accolades from the people of the Northwest and planners from across the country.

February 27, 1994

Jim Reid, Manager
Division of Planning and Community Development
707 Smith Tower Building
506 Second Avenue
Seattle, WA 98104

Re: Comments on Draft Supplemental Environmental Impact Statement
for the Countywide Planning Policies

Dear Mr. Reid:

Please find attached comments on the Draft Supplemental Environmental Impact Statement for the Countywide Planning Policies

Sincerely,

Robert E. Brady

Robert E. Brady
1304 251st Avenue SE
Issaquah, WA 99027
(206) 392-5059

Note attachment for perspective on these questions.

February 27, 1994

Jim Reid, Manager
Division of Planning and Community Development
707 Smith Tower Building
506 Second Avenue
Seattle, WA 98104

Re: Comments on Draft Supplemental Environmental Impact Statement
for the Countywide Planning Policies

Dear Mr. Reid:

Please make the East Sammamish Community Council a party of record to
the comments made to you by Gregory R. Allan and Robert E. Brady.

Sincerely,



Robert E. Brady
Chairman, East Sammamish Community Council
1304 251st Avenue SE
Issaquah, WA 98027
(206) 392-5059

Scope of EIS -- Page 3

Feasibility Analyses--DEIS identifies the fact that the DEIS does not
contain "fiscal impacts or market feasibility information."

IN-2
IN-4

How can anyone effectively evaluate the alternatives without such
information? It should be noted that their are significant impacts on taxes
and mitigations buried in the planning offered in every chapter. Some
chapters have cited the unfulfilled need for this information. How can
reasonable conclusions be reached?

Doesn't the lack of feasibility information derail the whole intent of the
DEIS? Should not the DEIS specify that the plan fails to meet the
requirements of SEPA because it does not identify the costs of the
environmental impacts it proposes to solve?

Other Scoping--The baseline assumptions used in the DEIS seem to be
flagrantly short and the ones which are cited, as the 1985 Comprehensive
Plan, are not GMA documents. Doesn't this make the whole plan a non-
GMA plan and therefore this DEIS a non-GMA EIS? Are we going to do
this all over again to be GMA compliant?

Urban Growth Lines --Page 16

IS-1

IS-4

Urban Growth Line--The interim UGA was based on the previous
comprehensive plan -- a non-GMA plan. Our studies show that there is not
enough tax monies within King County and its special districts to build the
required infrastructures on the west side of the line? What is the basis for
the line if not to put in infrastructure on the west side within cost
constraints? What are the infrastructures needed? Who is going to fund
them? When will they be funded?

There is an unfilled gap in the DEIS between its intent to force
infrastructure monies into the urban centers and its intent to force
infrastructure monies into the balance of the urban areas. The urban

areas, not in the centers, are likely to catch the most growth and need the most infrastructure. Where is this analysis?

Community Planning not Discussed

Community Plans--Since Community Plans are a part of the Comprehensive Plan under GMA, how are these plans related to this DEIS? Are those plans addressed by this DEIS? Are the area studies incorporated? Does this DEIS incorporate the previous public involvement?

Throughout Document

Mitigations--References to mitigations throughout are short of cash. The Issaquah School District, for example, has raised less than \$200,000 through mitigations since mitigations were begun, but is building two new schools to accommodate the growth. The DEIS needs to point out that mitigations are not offsetting much of the costs for any of the needed infrastructures. Therefore there is a large shortfall that is now falling to tax payers. Are mitigations sufficient? Who pays? When? Who makes up differences? What is the process for planning changes in mitigation levels required by the plan?

Robert E. Brady

Robert E. Brady
1304 251st Avenue SE
Issaquah, WA 98027
(206) 392-5059

King County Is Not Effectively Managing Growth by Robert E. Brady

There are essentially two ways to manage growth. The first, and most popular with King County, is to manage it through planning. The County creates a Comprehensive plan which in turn forms the basis for many Community Plans. The Community Plans and their outcomes are then used to form the basis for the next Comprehensive plan. The whole cycle can take ten years or more and is full of many difficulties.

Here are a few of the larger problems. (1) Plans are often politically motivated. There is ample evidence to show relationships between plans for certain King County projects and the money donated to some politicians. Political favoritism to donors is legal providing that the sources of the monies are disclosed on Public Disclosure Statements and there is an Appearance of Fairness (Note: not intrinsic fairness). (2) Trying to control events because King County either did or did not plan for them absorbs a lot of public and private energy. There is no way to re-plan as circumstances change. Changes in direction which may be worthwhile as a result of real events (e.g., the building of a new road or a new environmental need) cannot be incorporated quickly. Response time is often measured in decades. (3) Public involvement is lacking. Plans only work when there is a "buy in" by the residents most affected. The advisory committees which are frequently set up by King County do not represent the citizens. The public process is poorly engineered and not trustworthy.

There are many examples on what can go wrong when "Planning" is the way you choose to make most decisions. The Russian experience is more serious than King County's, but is a good example of how bad planning can get. Remember the five year plans? They failed for the very same reasons cited above -- politics, inflexibility, and the lack of "buy in" by the people most affected.

Fortunately, in America we have another alternative.

The second way to control growth is through economics. In a truly free economic system, growth will tend to go to where it should go because it naturally optimizes the profits of developers.

To allow the economic approach to work, governments cannot subsidize development activities as King County and special districts now do. A free system requires developers

to pay for all the new infrastructures (i.e., public improvements) needed to make their projects successful, including the new capital for parks, schools, roads, emergency services, and other supporting improvements.

The past practice of King County has been to allow development to proceed without asking developers to create the infrastructures needed to make their developments tolerable. Since King County and other taxing districts have been willing to spend their monies on the required improvements, the developer is enriched when he or she buys cheap property. Subsidized sprawl is the end result. Little regard to what makes the best sense for the public is obtained.

To be fully successful, the economic approach requires that developers pay 100% for the infrastructures they need. Costing formulas need to be worked out for each unique King County area based upon the "best" evidence so that the costs of the improvements may be passed on to the developer as a matter of law. The objective here is to be reasonably accurate, not perfectly accurate. Fairness and predictability is required.

Under the economic system developers will wish to go to the places where infrastructures exist, not to where they do not.

It is my belief that King County is not meeting its growth management obligations to its citizens. Approaches used are mucked up. The County needs to clarify its processes and understand them, both shortcomings and strengths. It needs to build bridges to the world it is supposed to represent.

Robert E. Brady
1304 251st Avenue S.E.
Issaquah, WA 98027
(206) 655-4107 (w)
(206) 392-5059 (h)

Bob Brady is the Chairman of the East Sammamish Community Council and lives near Beaver Lake.



February 28, 1994

FAKED 2-28-94

Lisa Majdiak
Planning & Community Development Division
Parks, Planning & Resources Department
707 Smith Tower
506 Second Avenue
Seattle, WA 98104

Re: King County Countywide Planning Policies

Dear Lisa:

I would like to go on record as having serious concerns regarding the direction the countywide planning policies have taken to date. As a member of the residential design profession involved on a day to day basis with the development of single family homes in King, Snohomish and Pierce counties, I am concerned that the alternatives put forward do not realistically address the wants or needs of the population we are supposedly going to provide housing for over the next ten to twenty years.

Point No. 1 is that as long as alternatives exist, the majority of these people are not going to be forced into high density centers no matter how attractive the planners make them sound. They want safe suburban neighborhoods with good schools and, hopefully, affordable single family housing.

Point No. 2 is that the existing neighborhoods around these centers don't want the added density and will fight to stop it.

Point No. 3 is that by restricting the available land base outside these urban centers, the price of land and therefore the price of housing will skyrocket. This factor is what makes these plans really no growth plans rather than managed growth plans.

As an alternative, I would ask that the growth targets for the urban centers be reduced to a more realistic number and that the various affected jurisdictions be given the opportunity to understand and comment on the consequences that this increased density holds for them.

LA-9

HO-6

LA-1(d)

LA-4

LA-10

HO-8

LA-9

LOZIER HOMES CORPORATION

100 AVENUE 100, SUITE 100, BELLINGHAM, WA 98201

TEL: (360) 735-1111 FAX: (360) 735-1112

Lisa Majdiak
Planning & Community Development Division
Parks, Planning & Resources Department
February 28, 1994
Page 2

LA-1
In addition, a serious study of the net buildable land available within the urban growth area must be completed, taking into account existing uses, environmental limitations, requirements to set aside land for schools, parks, transportation and other required uses needed to serve the targeted population. I feel such a study would show that current urban growth boundaries do not provide the needed buildable land to support the projected population increase in our region.

Sincerely,



Paul Burckhard
Vice President, Design

PB:cke

Memo

Environmental Planning and Real Estate Division

Environmental Reg. 015:125
DATED
FEB 28 1994
110

February 28, 1994

TO: Mr. Jim Reid, Manager
Planning and Community Development Division

FROM: Gregory M. Bush, Manager ^{GB}
Environmental Planning and Real Estate Division

SUBJECT: King County Countywide Planning Policies
Draft Supplemental EIS

Metro staff has reviewed the King County Countywide Planning Policies SEIS and we have the following comments.

GENERAL COMMENTS

LA-11(b)
LA-5
The SEIS assumes that growth would be more concentrated under the 14 centers alternative than under the eight centers alternative. This must assume that a center can only accommodate so much growth; i.e., that there is an upper limit on the size of the center. However, it might be that with fewer centers, more growth would be attracted to each center. There would be less competition between centers, and more certainty that growth would occur in any one of the eight centers. This fundamental growth assumption underlies many of the document's conclusions, including the effect on transit usage discussed on page 89 (see comment below). Additional discussion of how the growth assumptions were developed would be useful. In addition, an assessment as to whether eight centers might not function as a greater attraction for more concentrated growth, easier to serve with public transportation, that the 14 centers concept, would be valuable.

INTRODUCTION

Page 4 - No Action Alternative:

TR-4
Clarify assumptions regarding local jurisdiction support of Urban Center CPP policies - specifically, L-32 (Appendix A-1, page 21) which seems to provide the basis for conclusions in the TDM impact discussion. If urban centers are not designated, would local jurisdictions aggressively implement parking management strategies, especially assuming no significant increase in transit?



Page 6 - Table 1:

What is the definition of Urban/Auto Full Service and Urban/Auto No Full Service? Assuming these classifications correlate with the maps in Appendix A, this breakdown is not shown.

TRANSPORTATION

Page 75 - TRANSPORTATION DEMAND MANAGEMENT:

Parking management, parking pricing, fuel pricing, etc., are generally considered subelements of congestion pricing.

Page 76 - LAND USE/TRANSIT LINKAGE:

The heading Transit for Seattle is somewhat misleading and should be changed. The discussion under this section generally described Metro's overall operations (in terms of routes, miles and passengers). Metro has long been considered to be Seattle-centric, and such a heading simply reinforces this notion. A replacement heading could be Metro Transit Service.

Page 76 - "Transit for Seattle", second paragraph:

Clarify that Community Transit operates express bus service to Bothell and the Bellevue Transit Center, and local bus service to Bothell and the Aurora Village Transit Center.

Page 76 - "Transit for Seattle", third paragraph:

Revise to read "Approximately 10 percent of the *estimated unlinked* trips in Seattle....".

Page 79 - "Linking Land Use and Transit":

Either this discussion should be placed under the discussion of the Regional Transit System Plan (as that is all that is discussed), or it should be broadened to reflect other relevant plans and policies, such as Vision 2020 and the GMA.

Page 79 - ROADS AND FREIGHT:

Capital facilities should be a part of the Linking Land Use and Transit discussion. Park-and-ride lots, bypass ramps, flyer stops and transit centers are a part of Metro's passenger facilities and transit link. These facilities are not for busses only or HOV only. These facilities encourage transit usage, reduce single occupant vehicle (SOV) usage, contribute to transportation demand management, encourage carpool/vanpool usage, help to reduce parking/traffic in neighborhoods, and may provide access to HOV lanes

Page 80 - "Transit Flyer Stops":

Transit flyer stops should also be a part of the Land Use/Transit Linkage discussion. Flyer stops are part of Metro's passenger facilities and transit link.

Many of the same comments for capital facilities apply to flyer stops. Flyer stops speed transit travel and intercept some of the SOV traffic at various points within major travel corridors.

Page 80 - "Park-and-Ride Lots":

The short discussion on available park-and-ride stalls appears to be misplaced. The discussion would fit more appropriately within the Land Use/Transit Linkage section. Discussion of park-and-ride lots as an integral part of the Metropolitan King County transit system appears to be lacking. For example, the overall utilization rate of these lots, especially in established high density transportation corridors, should be emphasized. Considering the time required to bring new or expanded facilities on line, current demand in these areas is critical.

Page 80 - NON-MOTORIZED TRAVEL:

We recommend that the discussion of non-motorized travel be expanded. The Puget Sound region has become very active in the promotion of non-motorized access opportunities. Most counties and cities have adopted or are developing non-motorized access plans as part of their comprehensive or transportation plans. An impressive network of bicycle pathways is developing throughout the region.

Page 81 - "Bicycle":

Improvements needed to promote bicycle usage under all alternatives should include more frequent sweeping of outside travel lanes and shoulders, which would have corresponding impact on operational/maintenance costs.

Page 84 - Table 8, 14 Centers Alternative-Land Use/Transit Linkages:

Would centers be linked by RTP or IICT?

The first column of the Mobility Matrix should read *HOV's and TDM* rather than Transit and TDM. The boxes in the first row across should then refer to *Congestion Pricing strategies, i.e. parking management, increased transit and ridesharing*.

Page 86 - TRANSPORTATION DEMAND MANAGEMENT:

The discussion of TDM seems limited to implementation of parking policies and the associated anticipated effect on average vehicle occupancy. TDM can include numerous types of programs, which can have different favorable results that reducing average vehicle occupancy. Measures such as encouraging mixed-land uses, tele-commuting and providing non-motorized paths can reduce the number of vehicular trips; flex-time options can shift trips out of the peak hour, reducing peak congestion. It seems that this discussion could be expanded to more fully represent the potential impact of a range of TDM measures to work effectively under the various alternatives.

Page 87 - "Mixing of Uses":

A discussion of vendors at transit facilities should be included.



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Page 87 - "Location of Uses":

Transit supportive land use patterns should also include linkages to services (i.e. medical, social, business, etc.), recreation and institutions.

Page 89; Eight Center vs. 14 Center impact Discussion:

The impact discussion states that the 14 center alternative is expected to result in a greater increase in transit usage than the eight center alternative. The stated reason for this conclusion is that pattern of development would be more easily served by transit. Can this statement be made so unequivocally? It seems arguments could be made to come to the opposite conclusion. Assuming a set amount of transit dollars, more centers could mean a more fractured demand for transit services, resulting in less attractive service levels and consequently, lower ridership to some of the centers. Conversely, fewer centers could mean more growth concentrated in fewer, easier to serve centers, resulting in increased transit shares to those centers. Further clarification or discussion would be useful. This comment also refers to the Main Findings section on page 73 and Table 8 on page 84.

Page 97 - MITIGATION MEASURES:

There is no discussion of development, expansion or enhancement of park-and-ride facilities in high use/high density corridors as a mitigating measure for the various alternatives. Such an omission ignores the importance of such facilities to the overall performance and success of the Metro transit network.

ECONOMIC DEVELOPMENT

Page 199; ECONOMIC DEVELOPMENT:

This section should include a discussion regarding the impact of transit service/facilities on economic development. Many prospective businesses want to know about transit service to an area before they select a location.

Thank you for the opportunity to review and comment on the King County Countywide Planning Policies Draft Supplemental EIS. If you have any questions regarding our comments please contact Katherine McKee, Metro Environmental Planning, at 689-3197.

GB:km3529

February 24, 1994

VIA FAX (296-0119)

Ms. Lisa Majdiak
Growth Management Supervisor
Parks, Planning and Resources Department
707 Smith Tower
506 Second Avenue
Seattle, WA 98104

RE: Draft SEIS for the Countywide Planning Policies

Dear Ms. Majdiak:

Please accept the following comments regarding the Draft Supplemental Environmental Impact Statement for the Countywide Planning Policies. Our comments focus on those portions of the Draft SEIS (DSEIS) relating to the City of Snoqualmie and its Urban Growth Area (UGA).

- LA -27** In our review of the DSEIS, we noted that none of the action alternatives included the Snoqualmie Joint Planning Area (JPA) in their impact analysis. This is a major omission. The Final SEIS should analyze and discuss the inclusion of the JPA into the Snoqualmie UGA as part of one or more of the action alternatives.
- IN -12**

During the past several years, Snoqualmie, King County and property owners near the interchange have worked together to promote joint land use and infrastructure planning in the vicinity of the interchange. This effort culminated in the adoption of the Snoqualmie Valley Community Plan along with the signing of the Joint Interlocal Agreement on February 12, 1990, to conduct joint land use and infrastructure planning. Not only is King County obligated to implement the Joint Interlocal Agreement, but as the City of Snoqualmie has consistently and correctly argued, the JPA must be included within Snoqualmie's UGA. In addition, County Planning Division staff in the Rural Cities Urban Growth Areas Report (draft dated September 1, 1993) notes that this JPA is subject to current discussions as to "whether the joint planning area should be within the city's UGA." It is our understanding that planning staff will be recommending that the JPA be included within Snoqualmie's UGA. Further, the King County Council in adopting the Interim UGA's on November 8, 1993, noted that the JPA will be designated as part of Snoqualmie's UGA when the joint planning is completed. All of this strongly suggests that the impact analysis in the Final SEIS should include the Snoqualmie JPA within the Snoqualmie UGA as a part of one or more of the action alternatives.

Thank you for your attention to this matter.

Sincerely,

C.R. CAUSEY
President

DSEISSNO.DOC

EC-18



CITY OF PACIFIC

COUNTY OF KING
100 - 3rd AVENUE SOUTHEAST
PACIFIC, WASHINGTON 98047
CITY HALL (206) 833-2856
PUBLIC WORKS (206) 833-2660

February 28, 1994

King County
Planning and Community Development Division
Parks, Planning and Resource Department
Smith Tower Building
506 Second Avenue, Room 707
Seattle, Washington 98104

Attn: Lisa Majdiak
Growth Management Project Supervisor

Re: Draft Supplemental EIS - King County
County-wide Planning Policies

Dear Ms. Majdiak:

The City of Pacific is in receipt of the Draft SEIS.

At this time, we have the following comments, observations, and/or questions:

1. It appears to be somewhat irregular to have adopted policies prior to completion of the SEPA Review process. If the purpose of the Draft SEIS is to refine or modify the adopted policies, it seems premature to have adopted them prior to review and finalization of the SEPA process.
2. The Draft SEIS indicates that further analysis is needed to determine effects of policies on economic development and the environment. We agree. Market forces may be a significant factor in determining affordable housing policies. There is some question in our minds whether affordable housing can develop effectively under concentrated development near urban centers, despite incentives. A fiscal analysis probably should have been presented along with the Draft SEIS to supplement alternatives. It is difficult to comment on alternatives without some back-up data.
3. The Draft SEIS states that comprehensive plans from respective jurisdictions will provide further data to produce a "county-wide perspective". We submit that this data may in fact change or refine alternatives and result in further extensions of the SEPA process. Some of the proposed Urban growth Areas for cities are still overlapping, for example, and still need to be resolved by jurisdictions.

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4. The adopted County-wide planning policies seem to indicate that commercial/industrial land uses may be restricted in smaller urban centers and steered more to larger urban centers. This is a "top-down" planning approach that is unfair to smaller cities attempting to diversify their economic base within their jurisdictional boundaries. The City of Pacific is opposed to any concept that may restrict the amount of commercial/industrial land uses or any other land use or environmental policy within its boundary.
5. Coordination and consistency of planning policies with adjacent counties (i.e. Snohomish and Pierce Counties) will be important as it affects some cities with jurisdictions or potential jurisdiction in more than one County.

Thank you for the opportunity to comment on the Draft SEIS. We hope these comments will be of some use in the SEPA process.

Sincerely yours,

HEDGES & ROTH ENGINEERING, INC.

Puyallup Office

Donald E. Benson

Donald E. Benson, A.I.C.P.

cc: City of Pacific
Mayor Amero
City Council Members
City Planning Commission Members
Hedges & Roth Engineering, Inc.

DEB/dlo

44-102-31
KING SEIS.LTR

IN-1

HO-2

IN-10

February 19, 1993

Ms. Lisa Majdiak
Growth Management Project Supervisor
King County Planning & Community Development Division
707 Smith Tower, 506 Second Avenue
Seattle WA 98104

Dear Ms. Majdiak:

As you requested, we have reviewed the scope of environmental review contained in the Request for Proposals to prepare a supplemental EIS to the King County County-wide Planning Policies dated December 24, 1992. The following are our preliminary comments on the scope of the environmental review.

Alternatives

The alternatives described in the published scope fall into two categories:

1. An alternative that assumes no county-wide planning policies (Alternative D); and
2. Three alternatives that assume different implementations of the county-wide planning policies adopted in 1992 (Alternatives A-C).

We have two comments on these alternatives. First, Alternative D, not Alternative A, should be the no-action alternative. In addition, Alternative D should evaluate the maturation of existing mixed-use centers and the creation of new mixed-use centers under existing land-use controls and market forces.

Second, and more importantly, the proposed scope does not include alternative county-wide planning policies. The environmental review section of the Department of Ecology recommends that SEPA review of county-wide planning policies analyze "alternative ways or policies to achieve the objectives stated in the Growth Management Act." The Growth Management Act and the State Environmental Policy Act: A Guide to Interrelationships, at p. 8 (Pub. No. 92-07, February 1992). To provide a sound analysis of the impacts of the county-wide planning policies, the supplemental EIS should include at least one alternative set of policies, including:

1. An alternative land-use policy that encourages urban centers to vary in geographic size and housing/employment densities to reflect local needs and conditions, and allows a wider distribution of smaller centers to provide broader opportunities for economic development, tax revenues and job settings;
2. Alternative transportation policies that do not rely primarily on rapid transit; and
3. An alternative urban growth area that provides wider opportunities for urban development, balanced by preservation or creation of significant open space within urban growth areas and the protection of agricultural and forest lands of long-term commercial value.

Ms. Lisa Majdiak
February 19, 1993
Page 2

In proposing this alternative, we do not intend to recommend it over the present county-wide planning policies. There is, however, a widely perceived need to better understand the environmental impacts and policy trade-offs arising from the policies adopted in 1992. Many cities ratified the county-wide planning policies on the express condition that the supplemental EIS provide that understanding. A true alternative is necessary to achieve this goal and may also identify potential changes to the policies that would not arise from the current set of alternatives.

Elements of the Environment

Land and Shoreline Use. We have four comments on this section of the scope of environmental review. First, this section should specifically analyze the impact of the alternatives on housing affordability. The scope of environmental review focuses on housing capacity, not on housing affordability. Providing the minimum acreage needed to accommodate projected population will not accomplish Growth Management Act goals if the result is to inflate the value of homes beyond the price an average family can afford. The Vision 2020 EIS, which was adopted as part of SEPA compliance for the county-wide planning policies, warns that land prices are expected to increase in areas where growth is concentrated and that mitigation may be necessary. See county-wide planning policies EIS addendum, p. 11 (June 1992); Vision 2020 final EIS, p. 207 (September 1990). No specific mitigation, however, has been proposed or analyzed.

Second, the supplemental EIS should analyze the impact of urban and manufacturing center policies on employment and economic development in King County. The scoping document does provide for an analysis of "relative impacts on type, tenure, affordability and practical accessibility to employment..." Again, however, the scoping document emphasizes the land capacity to accommodate employment. This approach, however, does not take into account the needs and desires of different types of employers and businesses. For example, mandating that most new employment shall occur in dense urban and manufacturing centers runs counter to the need of start-up companies for lower-cost business space, or the desire of many companies to locate in non-urban business/office parks, with campus-like settings. It also ignores new technologies and new design concepts that encourage a wider distribution of employment, without historically inefficient uses of land or traditional traffic impacts.

Third, this section of the supplemental EIS should consider the relationship between employment and housing. It is important to understand the general types of employment that exist in King County, the kind of housing their work forces can afford and how that housing can be provided.

Fourth, the supplemental EIS should address the impact of the policies on existing industrial uses, such as our Snoqualmie and Enumclaw mills, which are located outside of urban centers and do not appear to qualify as manufacturing/industrial centers under the proposed policies.

Both our Snoqualmie and Enumclaw mill sites are zoned industrial. The council visited this issue in the 1985 comprehensive plan, as well as both applicable community plans. It changed each of these plans to ensure that our mills were not non-conforming uses. Current county-wide planning policies appear not only to discourage such uses in the future, but also to make existing rural, resource-based industrial uses nonconforming. Clearly, we hope that this is not the council's policy intent. We ask that the supplemental EIS analyze whether the policies affect industrial users located outside centers, which the council has historically recognized as important contributors to the regional economy.

Ms. Lisa Majdiak
February 19, 1993
Page 3


Transportation. The county-wide planning policies assume, and in turn are intended to promote, the development of a new rapid-transit system for the region. We understand that a regional transportation plan is currently in preparation and will undergo a separate environmental review. The adopted county-wide planning policies, however, do not consider alternatives if rapid transit proves to be politically, financially or environmentally infeasible. This issue should be addressed in the supplement EIS.

The supplemental EIS should also analyze the potential excess capacity of existing transportation systems and whether the alternatives encourage the use of those resources.

Public Services and Utilities. We have two comments on this section of the scope of the environmental review. First, this section of the supplemental EIS should analyze the impact of concurrency requirements on different alternatives. For example, some economists have argued that it is more expensive to improve existing services and utilities for in-fill development than to develop new services and utilities for new development. If this price differential prevents or delays in-fill development projects from meeting concurrency requirements, then the policy of encouraging in-fill in urban centers will be frustrated. The EIS should analyze the concurrency issue

Second the relationship between this section of the supplemental EIS and a separate fiscal analysis is unclear. The fiscal impact analysis will address relative revenue impacts on larger and smaller jurisdictions resulting from the policy to create urban centers. The ability to provide needed public services and utilities is tied to the fiscal impacts of the county-wide planning policies. As a result, any conclusions and proposed mitigations contained in this section of the supplemental EIS will depend on separate fiscal analysis.

Sincerely,



Lynn M. Claidon, Manager
Puget Sound Government and Community Affairs

ENCLOSURE

cc: M. L. Hogans
H. J. Fitzgerald - Quadrant
Tom Miller - Cascade Land & Timber
J. A. Nyberg - WRECO



Corporate Headquarters
Tacoma, Washington 98417
Tel (206) 924 2345

February 28, 1994

Mr. Jim Reid, Manager
Planning and Community
Development Division
Parks, Planning and Resources Department
707 Smith Tower Building
506 Second Avenue
Seattle, WA 98104

Re: Draft Supplemental Environmental Impact Statement
for the Countywide Planning Policies

Dear Mr. Reid:

I am writing on behalf of the Weyerhaeuser Company, the Weyerhaeuser Real Estate Company, and the Quadrant Corporation, to comment on the Draft Supplemental Environmental Impact Statement (Draft SEIS) for Amendments to the Countywide Planning Policies issued by the King County Planning and Community Development Division. We have reviewed the Draft SEIS and have a number of concerns about the scope and level of detail included in the Draft SEIS. We are also concerned that the description of the Proposed Action may describe actions not fully analyzed in the Draft SEIS and may not be broad enough to include other actions that the Metropolitan King County Council intends to take in the future.

Scope

Although the policies themselves are quite detailed, including, for example, specific criteria for the designation of Urban Centers and targets for households, employment, and affordable housing, the Draft SEIS acknowledges a number of limitations to the scope of environmental review, including a lack of information on the fiscal impacts or market feasibility, a lack of quantitative environmental analysis, a lack of specific baseline information on the location and capacity of infrastructure, the failure to use growth models in allocating employment and household growth targets, and the failure to use transportation models to forecast or suggest traffic conditions in the year 2010 (Draft EIS, page 3). We are concerned that the level of detail in the environmental analysis may not be comparable to the level of detail in the Countywide Planning Policies.

IN-2

IN-4

Mr. Jim Reid
February 28, 1994
Page 2

On February 19, 1993, we commented on the proposed scope of the Draft SEIS. At that time, we were concerned about the scope of the proposed alternatives, the need for meaningful analysis of the land use impacts of the Countywide Planning Policies, the reliance upon the development of a region-wide rapid transit system, and the need for a fiscal impact analysis as the basis for selecting a reasonable and affordable range of alternatives. Now that the Draft SEIS has been issued and we can see that our concerns have not been addressed, we wish to reiterate our comments. We have enclosed a copy of our previous letter and request that these issues be analyzed and incorporated into the Final SEIS.

Proposed Action

According to the Fact Sheet, the purpose of the Draft SEIS is to analyze the impacts of possible amendments or new policies to refine the existing Countywide Planning Policies and the impacts of the designation of Urban Centers and Manufacturing/Industrial Centers. Although the Draft SEIS includes a discussion of the impacts of the proposed policies and five alternatives, there is no analysis of the impacts of the designation of specific Urban Centers or Manufacturing/Industrial Centers or of the impacts of the criteria in the Countywide Planning Policies for these designations. Nor is there any discussion of alternative criteria or policies for the designation of these centers.

In addition, it is not clear whether the Draft SEIS is also intended to analyze the impacts of the future action by the Metropolitan King County Council to adopt the final Urban Growth Areas. If it is the County's intent to adopt the final Urban Growth Areas as an amendment to the Countywide Planning Policies, as well as in the County's Comprehensive Plan, then the Draft SEIS should clarify what is included in the proposed Urban Growth Areas and analyze the impacts and alternatives. For example, the Draft SEIS does not mention the County's adoption of Interim Urban Growth Areas in November 1993, nor does it discuss or analyze the Urban Growth Areas proposed by the cities in east King County, including the Joint Planning Area created by an interlocal agreement between King County, Snoqualmie, and Snoqualmie Ridge Associates. Clarification and more analysis are necessary.

Mr. Jim Reid
February 28, 1994
Page 3

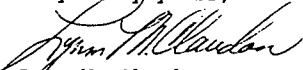
Further Analysis of the Preferred Alternative

The Weyerhaeuser Company is committed to the implementation of the Growth Management Act. We have participated in the County's planning process during the past few years and are anxious to see the work completed and bring this process to a close after so much time and so much work by so many people. However, the Draft SEIS acknowledges serious limitations in the environmental analysis. In addition, it now appears that the target numbers for households and employment for Urban Centers are not realistic and that the plan for rail may be delayed. The Draft SEIS recognizes that technology now permits people to live in smaller towns and telecommute or work in satellite offices, but does not analyze how new ways to work could reduce the need for expensive transportation solutions designed to move workers to Urban Centers. Finally, the Draft SEIS acknowledges that market factors were not considered during the development of the Countywide Planning Policies and that we are planning for what we think people should want rather than incorporating a range of options the market offers and developing incentives consistent with realistic planning goals and what we can afford.

We expect further issues will arise when the fiscal impact analysis becomes available and the County addresses implementation strategies and the issues of infrastructure financing and who will pay. The selection of a preferred alternative and revisions to the Countywide Planning Policies for analysis in the Final SEIS must address how the fiscal impact analysis will influence and affect the development of each jurisdiction's Comprehensive Plan so that we can be assured that we are being practical and realistic about what can be implemented. To do otherwise will simply create more uncertainty for the public and result in additional administrative cost and confusion.

We have enclosed our original comment letter on the scope of the Draft SEIS, together with a list of additional questions and concerns about the content of the Draft SEIS for your response. Thank you for the opportunity to comment.

Very truly yours,


Lynn M. Claudon, Manager
Puget Sound Government
and Community Affairs

Enclosures
220434

ADDITIONAL QUESTIONS AND COMMENTS
ON DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT

Land Use

- LA-2
LA-3
LA-4
1. What are the uncertainties and possible errors in the data mentioned on page 14 of the Draft SEIS and how could they affect the land use impacts?
2. The GMA requires that King County plan for the Washington State Office of Financial Management population growth estimate of 325,000 people by the year 2010. The Draft SEIS discusses alternative ways to accommodate 215,000 households, assuming 1.5 persons per household, but does not discuss the basis for this assumption of household size or the impacts of assuming this household size rather than providing for a larger or smaller number of households to accommodate 325,000 new residents.
- LA-8
3. What are the impacts of making the designation of the Urban Growth Areas permanent? Does that mean that the Urban Growth Areas must be able to accommodate much more growth and for a much longer period than 20 years?
- LA-12
4. If the population and employment targets for the Urban Centers are not likely to be achieved, will Countywide Planning Policy LU-16 effectively preclude any development except within Urban Centers? Will this policy divert growth to adjoining counties? Should Countywide Planning Policy LU-16 be revised to permit some growth within Urban Growth Areas where infrastructure improvements can be extended?
- LA-9
LA-10
5. What evidence exists that a 25 percent cushion for the targets is adequate? Is a larger cushion needed in urban infill situations to encourage redevelopment there rather than in undeveloped urban areas? Do these cushions need to be larger if the Urban Growth Areas are permanent? What are the impacts on housing affordability and the spillover of development into adjacent counties if the cushions are not large enough?
- LA-4
HO-6
HO-8
6. What funding strategies and incentives are required to achieve the Urban Center targets and what are the impacts on the natural and built environment within the Urban Centers if the targets are achieved? What are the land use impacts on the adjoining Urban Growth Area and adjoining counties if these incentives are not provided or are not successful?

- LA-16
7. What are the impacts of planning for Urban Centers with 15,000 jobs within .5 miles of a transit center and an average of 50 employees and 15 households per gross acre within 1.5 square miles without rail? Are there examples of other cities (e.g., San Francisco, Vancouver, B.C.) where these densities have been achieved? Can they be achieved with buses rather than rail?
8. It is unclear whether some or all of the proposed rural character policies apply to rural cities and their Urban Growth Areas? If so, what are the impacts of these policies within the rural cities and their Urban Growth Areas.
- LA-17
9. What is the impact of the Rural Task Force proposal to reduce maximum densities in rural areas to one unit per 20 or 35 acres? How will this proposal impact affordable housing, the Urban Growth Areas of rural cities, and the rural areas in adjacent counties? Would this policy proposal limit rural living to the wealthy and increase development pressure on Urban Growth Areas of rural cities and rural areas of adjacent counties where people who want to live in rural areas would be forced to locate? What evidence exists that these minimum lot sizes are necessary to protect rural character?
- LA-17
10. What is the meaning of the conclusion in the Draft SEIS on page 48 that "the County should work with rural area residents to further define what activities are considered rural, then apply them as mitigation to these development scenarios?"
- LA-18
11. What are the land use and environmental impacts of the suggested rural forestry zone? Is there any data to support the need for a rural forestry zone? How many forest practices permits were issued in the rural area? What volume of timber per acre was removed? How does total acres harvested compare with total acres replanted over the last 20 years? How much of this area is covered by a forest management plan? Would proposed Rural Task Force Policies RU-1, RU-2 and RU-5 provide an incentive for property owners to remove their property from forest tax classification and log it to pay the rollback taxes that would be required by the County when the classification is removed?
- LA-19
12. The Draft SEIS states on page 46 that proposed economic development policy ED-10 could have a significant impact on rural character if rural character is not

defined to include resource-based industrial activity. This issue is of particular concern to Weyerhaeuser. We had believed that Weyerhaeuser's two mills located in unincorporated King County were consistent with rural character and would conform to the Rural Character Task Force Proposed Framework Policy FW-RUa(b). In the County's recent adoption of the Snoqualmie and Enumclaw Community Plans, both mills were zoned heavy manufacturing. The Plans expressly stated that the County wished to ensure their long-term viability. Please clarify whether Weyerhaeuser's two mills are included within the definition of rural character. If they are not, we ask that the Rural Character Task Force Policies be modified to ensure the long-term viability of these mills.

LA-20

13. It is unclear how the Draft SEIS can conclude on page 42 that the no-action alternative could result in significant adverse impacts on rural areas if the County's Sensitive Areas Ordinance, Drainage Manual, Road Adequacy Standards, Clearing and Grading Code, Shoreline Regulations and SEPA all apply in the rural areas. The Draft SEIS sections on Stormwater Management and Plants, Animals and Fish do not agree with the conclusions stated on page 42.

LA-19

14. How is Countywide Planning Policy LU-12, which requires clustering of new development on parcels greater than 10 acres, consistent with the proposed new Rural Policies? What are the impacts of clustering on rural character?

LA-22

15. How will proposed Rural Task Force Policy RU-16 impact the ability of rural cities to provide for the infrastructure needs of their residents and the residents of their adjoining Urban Growth Areas?

LA-23

16. What will be the impacts of proposed Rural Task Force Policy RU-13 on the densities permitted in rural areas? Will widening of rural roads be permitted to accommodate permitted densities? If not, this policy should be modified to "permit pavement widths to accommodate permitted densities."

LA-24

17. What will be the impact of proposed Rural Task Force Policy RU-19(b)? How many existing preliminary plat approval will be affected? How many approved lots would be lost?

Affordable Housing

HO-4

18. How can you analyze the impacts of the Countywide Planning Policies and the Rural, Affordable Housing, and Economic Development policies on housing supply and affordability without the fiscal impact analysis and an understanding of the financing strategies that are being proposed? We are concerned that providing zoning for affordable housing will not make it happen unless the financing strategies are in place.

Transportation

TR-2

19. Is concentrated development in Urban Centers the only way to reduce vehicle miles? Should the Draft SEIS analyze the impacts of increasing the use of telecommuting and satellite offices and the coming information superhighway?
20. Do the Countywide Planning Policies provide adequate land for satellite offices in suburban and rural cities and the Urban Growth Areas and policies to permit the installation of fiberoptic cable, cells, cable T.V., and telephone lines?
21. What is the mode split that was assumed in the year 2010 for each of the five alternatives and how does it compare with the mode split in 1990 as shown in Table 5?
22. Why is the forecast of vehicle miles in Table 7 based upon eight centers using population and employment concentrations that are different from those in the eight centers alternative? What are the population and employment concentrations and mode splits used in Table 7?
23. How do the forecast vehicle miles traveled in the four scenarios in Table 7 compare with a scenario in which there would be concentration and no rail in the year 2010?
24. How do you know that reduced miles traveled results in fewer trips or less congestion as stated on page 83? If density is concentrated into Urban Centers and vehicle miles are reduced by less than 10 percent as shown in Figure 7, is it not more likely that congestion in the Urban Centers would increase and the number of vehicle trips would be the same or greater?
25. Why does the transportation section of the Draft SEIS "assess the impacts that the Alternatives would have on transportation systems projected into the year 2010" as

February 25, 1994

stated on page 82 rather than the impacts on the existing transportation system? It would be helpful to the decisionmaker if the Draft SEIS analyzed the demand of each Alternative for various types of transportation modes so that the fiscal impact analysis could assess the costs. Instead, the Draft SEIS assumes that we will have a high speed transit system by the year 2010 and then analyzes the impacts of the alternatives on this assumed system, stating that reduced use of transit and increased SOV use are adverse impacts.

Human Services, Police/Fire, Schools, Parks

- IS-1
26. How can the impacts of the Countywide Planning Policies on the need for human services, police/fire, schools and parks be analyzed without an analysis of the capacity of the existing facilities and services within the Urban Growth Areas and each jurisdiction's funding capacity for new facilities and services to accommodate the planned growth? Without this analysis, growth may be planned in areas where it cannot best be accommodated.

Water, Stormwater, Sewer, Solid Waste, and Utilities

- IS-6
27. It is not clear from the Draft SEIS whether there is a sufficient water supply for Countywide needs or what the existing capacity of the County's various water, sewage treatment, stormwater, and solid waste facilities are and when these capacities will be exceeded. Without this analysis, growth may be planned in areas where it cannot best be accommodated.
- IS-14
28. Will proposed Rural Task Force Policy RU-16 preclude locating water, sewer and utility lines in rural areas to serve rural cities and their Urban Growth Areas? If so, what are the impacts of this Policy?

Jim Reid, Manager
Planning and Community Development
707 Smith Tower
506 Second Ave
Seattle, WA 98104

Dear Mr. Reid,

1. In general, I like the Draft SEIS on the Countywide Planning Policies (CPPs). The county should ignore the minority of special interests that hope to personally profit by adding more alternatives to the DSEIS. If additional alternatives are added, then another round of public input and comment is required. RCW 36.70A.010(11).
2. I support either the 8 or 14 center alternative. There is no justification for enlarging the size of the current interim urban growth area (UGA). Enlarging the UGA will engender more urban sprawl which the county's 1985 comprehensive plan has proven so woefully inadequate to contain.
3. I also support the rural task force recommended refinements to the CPPs and urge their adoption. These policies were developed according to the GMA requirement of bottom up planning with a great deal of public participation. Councilmember Phillips deserves praise for the way he conducted the rural task force.

I also support the additional language at the end of the rural task force recommendations which protects the rural character of the rural area.

I do not support the "Rural Character Policies" promoted by the Suburban Cities Association. These policies were developed with no participation from rural residents. Instead they were developed by people that live in cities.

- IN-6
IN-10
4. The DSEIS contains a fatal error. Alternative four, "existing plans alternative", violates the SEPA WAC rules and should be deleted from the FEIS.

WAC 197-11-400(2) says an EIS "shall inform decision makers and the public of reasonable alternatives." WAC 197-11-786 says: "Reasonable alternative means an action that could feasibly attain or approximate a proposal's objectives..."

IN-10

The "proposal" at issue is refinements of the CPPs to provide guidance for implementing GMA. The 1985 comprehensive plan contains numerous deep-rooted conflicts with the CPPs, cannot attain the CPPs' objectives, and therefore alternative four (based on the 1985 comp plan) is not a "reasonable" alternative.

The Central Puget Sound Growth Planning Hearing Board (CPSGPHB) has spoken out strongly against pre-GMA policies like the King County 1985 Comprehensive Plan:

"However, to enact GMA plans and regulations that are bound by the 'old way of doing things' would perpetuate the very flaws of the past that the legislature explicitly set out to correct." *Twin Falls, Inc., Weyerhaeuser Real Estate Co. et al v. Snohomish County*, CPSGPHB Case No. 93-3-0003 at p.210¹ (1993)

Pre-GMA references are obsolete and an outdated frame of reference. *Edmonds and Lynnwood v. Snohomish County*, CPSGPHB Case No. 93-3-0005 at p.268 (1993)

Existing King County community plans were not obligated to balance local, regional and state interests as required by GMA. *Happy Valley Associates, City of Issaquah et al v. King County*, CPSGPHB Case No. 93-3-0008 at p.307 (1993)

5. In almost every section of the DSEIS, alternative four (based on the county's 1985 comprehensive plan) has the most significant adverse environmental impacts. The DSEIS contains a second fatal error since a major aspect of the county's 1985 planning approach was replicated in each of the alternatives. The FSEIS should be revised to put all aspects of the county's 1985 planning approach in alternative four so the adverse environmental impacts of this 1985 approach can properly be compared to the other alternatives.

IN-6
IN-10

Specifically, the proposed Novelty Hill Master Planned Developments (MPDs) are simply assumed to be a part of each alternative (See Map A following page xviii). These MPDs are specifically a product of the county's 1985 planning philosophy. These MPDs represent the antithesis of concentrating growth in already urbanized areas as required by GMA. (RCW 36.70A.110) All of the adverse environmental impacts described in each section of the DSEIS under alternative four, apply to these proposed MPDs.

IN-6
IN-10

¹ Page numbers are from the Board decisions as published by Code Publishing Inc.

IN-6

The DSEIS is fatally flawed since it fails to limit the MPDs to being a part of alternative four. By automatically including the MPD component of the county's 1985 planning philosophy in each of the alternatives evaluated, the DSEIS has neglected to properly distinguish the different alternatives and their different environmental impacts.

6. P.ii says each alternative guides development into areas "already served by the public services and facilities necessary for urban development". This is not entirely a true statement. Each alternative includes about 7,000 new dwelling units in the "urban" part of the county's Bear Creek Community Planning Area. Almost all of these 7,000 new units would be in the "island" urban growth area represented by the Novelty Hill MPDs. There are no urban facilities or services on this site or within several miles. All urban services and facilities will have to be extended to this site and/or created from scratch at great cost.

IN-11

The FSEIS should be revised to state that the MPDs are being treated as an exception to the language quoted from p.ii or the MPDs should be deleted as an "island" urban growth area from the map in the CPPs and from CPP LU-14(b).

7. P.vi says "the idea is to reduce the taxpayer's costs by encouraging concentrated development in those areas where services are already provided."

It would cost the taxpayers a great deal to extend urban services to the "island" of urban growth represented by the proposed MPDs in the rural area between Redmond and Duvall. The nearest urban services are several miles from the MPD site. The FSEIS should be revised to state that the MPDs are being treated as an exception to the language quoted from p.ii or the MPDs should be deleted as an "island" urban growth area from the map in the CPPs and from CPP LU-14(b).

IN-11

8. P.xii says "New growth will be phased into Urban Centers and other urbanized areas which have existing infrastructure for transportation, water, sewer and surface water management."

IN-11

P.9 describes the 8 center alternative by saying "New growth would be phased first into the centers and secondly into other urbanized areas which would have available infrastructure capacity for transportation, water, sewer, and surface water management."

P.9 also says the 14 center alternative is the same in this regard as the 8 center idea.

The proposed Novelty Hill MPDs conflict with the above language since they

represent some of the first urban growth that will occur despite the fact that the MPDs are not an "urban center". The FSEIS should be revised to say the proposed MPDs have been designated as an "island" urban growth area despite their complete lack of any existing urban services and therefore the MPDs are being given special treatment as an exception to the above quoted language from P.xii. and p.9. Alternatively, the MPDs should be deleted as an "island" urban growth area from the map in the CPPs and from CPP LU-14(b).

9. P.19 and 20 discusses the "centers" idea as expressed by the county's 1985 comprehensive plan and says:

"These centers are in existing urban areas... These centers theoretically already existed in cities and towns... There was never an attempt to designate any further centers."

IA-11

This is not a true statement. Subsequent to 1985 the county gave "urban center" status to a large tract of undeveloped wooded property in the middle of the rural area between Redmond and Duvall. The county's 1989 Bear Creek Community Plan states on p.10 that the proposed MPD site is being designated an "urban activity center". This was done despite the fact that the Citizen Advisory Committee working on the Bear Creek Community Plan submitted a minority report stating that designating the MPDs as an urban activity center violated the county's 1985 comprehensive plan.

The MPDs were designated an urban center in the 1989 community plan (pre-GMA) despite the fact that they are not an existing urban area nor are they an existing city.

The above quoted language from p.19 and 20 is not true and should be revised in the FSEIS.

10. Page viii takes the official forecast population increase for King County of 325,000 people and equates that to 215,000 more dwelling units. The FSEIS needs to include the justification for such a high number of dwelling units compared to the population forecast. Compared to current data, it appears the forecasted need for dwelling units has been inflated to achieve a larger urban growth area.

HO-3

11. Page 26 shows that each alternative has a target of 215,000 new dwelling units and a capacity of 320,350 new dwelling units. (This capacity for new units is also similar to the grand total in table B-3 in the Appendix.) The capacity of each alternative exceeds the forecast need for new dwelling units by 49%. This is a grossly excessive capacity above the 20 year forecast and will simply

IA-2

LA-4

LA-2

continue the present pattern of urban sprawl with its concomitant decrease in the quality of life.

The publication *Providing Adequate Urban Area Land Supply* from the state Department of Community Development cautions on page 17 that land use plans should not exceed 25% of forecast needs or else sprawl will result. The release of the DSEIS proves that the urban growth area in the CPPs is fatally flawed since it is excessively large.

12. Each alternative really has far more capacity for new dwelling units than the 320,350 forecast on p.26. P.17 says the p.26 forecasts are based on current zoning discounted for numerous factors including environmental and market forces. As cities implement GMA they will be upzoning land. This will increase the dwelling unit capacity above the DSEIS figure of 320,350 which is based on current zoning.

In other words, GMA will result in greater densities of population and employment than has typically occurred. *Edmonds and Lynnwood v. Snohomish County*, CPSGPIIB Case No. 93-3-0005 at p.268 (1993).

The excessively large urban growth area in the CPPs (49% over forecast) will result in continued urban sprawl. As cities upzone land to concentrate growth there will be continued pressure to build urban sprawl in the unincorporated urban growth area. Under each alternative the excessively large unincorporated urban growth area invites continued urban sprawl causing continued innumerable significant adverse environmental impacts.

The DSEIS is fatally flawed since it fails to identify, discuss and mitigate the adverse environmental impacts caused by the urban sprawl that will continue under the excessively large urban growth area of each of the alternatives reviewed.

13. The forecast capacity for new dwelling units on p.26 is based on the urban growth line in the CPPs adopted by King County as Ordinance 10450 in 1992. However, when the county council passed Ordinance 11110 on November 8, 1993, the county council significantly increased the size of the urban growth area beyond the recommended urban growth area in the CPPs. There is no justification for the county council expanding the urban area when the land designated urban in their CPPs already exceeds the forecast need by 49%.

The county council expanded the urban growth area based on the newly adopted East Sammamish Community Plan. This community plan is based on the county's 1985 comprehensive plan and is not a GMA compliant plan. *Happy*

IN-9

Valley Associates, City of Issaquah et al v. King County, CPSPHIB Case No. 93-3-0008 at p.312 (1993). Yet the DSEIS repeatedly says that planning under the 1985 comprehensive plan (alternative four) has the most significant adverse environmental impacts of any of the alternatives.

WAC 197-11-768 indicates the first way to mitigate an adverse impact is to avoid taking the action causing the impact. In order to eliminate the significant adverse environmental impacts associated with planning under the county's 1985 comprehensive plan and with having an excessive capacity for dwelling units, the FSEIS should recommend that (1) the extensions to the urban growth area on the east edge of the East Sammamish community planning area and (2) the proposed Novelty Hill MPDs ("new fully contained community") both be eliminated and revert to rural zoning.

The way to grow smart is to give up on the county's 1985 planning approach with all its adverse environmental impacts so well described in the DSEIS (alternative four) and focus instead on the new goals and requirements of GMA. The GMPC should shrink the urban growth area in the CPPs by eliminating the MPDs as an "island" urban growth area from the map in the CPPs and from CPP LU-14(b).

14. The excessive capacity for dwelling units in the urban growth area defined by the CPPs (see p.26) proves there is no justification for "edge" cities and rural cities to continue to lobby for an ever larger urban growth area. Any proposed expansion of the urban growth area as depicted in the CPPs will require separate environmental review since such proposed expansions are not addressed by this DSEIS.

15. P.17 says the forecast dwelling unit capacity has been discounted due to critical area constraints. This will create an artificially low estimate of dwelling unit capacity because King County allows the transfer of density credits from critical areas to noncritical areas. Dwelling units are not lost due to critical areas, they are just moved around.

All alternatives contain this flaw. This mistake will result in a larger urban growth area than really needed. The excessively large urban growth area will foster continued sprawl with all its adverse environmental effects.

The FSEIS should contain revised dwelling unit forecasts that are not discounted for critical areas.

16. P.v says the CPPs were guided by GMA and Vision 2020. This statement conflicts with p.19 which states that the UGA (in the CPPs) is largely based on the county's 1985 comprehensive plan.

The FSEIS should clarify that while some of the policies in the CPPs have been based on GMA and Vision 2020, the UGA in the CPPs is based on the county's 1985 comprehensive plan.

17. P.vi says the CPPs are "only a framework to guide development of the comprehensive plans for King County and each city within the county." This statement does not correctly reflect the important role of CPPs.

"The Board reaffirms its holding in *Snoqualmie* that policy documents under the GMA (including CPPs and comprehensive plans) are no longer 'just' advisory blueprints to be heeded or disregarded at the discretion of the local legislative body. Rather, these policy documents provide substantive direction and must be followed." *Poulsbo, Port Orchard and Bremerton v. Kitsap County*, CPSPHIB Case No. 92-3-0009 at p.127 (1993).

18. P.xvii says "current zoning provides an inadequate 'cushion'..." The DSEIS does not support this conclusion. The data on p.26 specifically show that under current zoning, as discounted for many factors, there is a 49% excess land capacity compared to the 20 year forecast. Instead of an inadequate cushion, there is an excessively large cushion.

19. P.41 talks about the importance of maintaining the rural character of the rural area. "Chateau" style homes with 5 acre lawns should not be allowed in the rural area. We all know "rural character" when we see it. "Chateaus" and 5 acre lawns just don't qualify.

Just like waterfront, rural land is limited in supply. In order to preserve rural character, the rural land should be used by those that contribute to, rather than detract from, rural lifestyle. Because supply is limited, the market determines the price, just like with waterfront.

In order to protect water quality we do not continually increase densities around lakes. The same principle is true in the rural area. In order to protect rural character, the density should not be continually increased in the rural area. Anythin less than five acre lots will erode the rural character. When the rural area is full, then it's full. In order to maintain the rural character of the rural area, the GMPC should adopt the additional policy at the end of the rural task force recommendation.

20. P.43 CPP LU-12 requires mandatory lot clustering for development in the rural area. This will not protect traditional uses in the rural area and should be eliminated in favor of the rural task force recommendations. The clustered lots will not be large enough to engage in traditional rural uses particularly those involving livestock. Therefore people living on the clustered lots will be seeking a suburban, not rural, lifestyle and level of service. Mandatory lot clustering is a thinly veiled gimmick to put rural land into a holding pattern for future urbanization.

- A-4 21. P.53 & 54. There are references to using "monitoring" as a mitigation. This is nonsense. Monitoring tells you when something has gone wrong and does nothing to avoid having things go wrong in the first place.

- IS-6 22. P.125 Water Supply. The DSEIS is fatally flawed since it fails to acknowledge that the lack of uncommitted water supply from the Seattle Water Department (SWD) renders each alternative unachievable. Alternatives that are not achievable fail the test for reasonableness under WAC 197-11-400(2) and WAC 197-11-786.

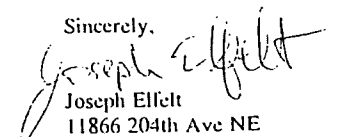
The current Seattle Water Comprehensive Plan says supply equals demand and all new growth in water usage will be served by conservation until a new major supply is online. However, the water supply available from conservation has all been committed by all the outstanding contracts to deliver water issued by Seattle and the 30 or so jurisdictions relying on Seattle water.

It is only the fear of learning the truth that prevents each jurisdiction, including Seattle, from inventorying and reporting the amount of Seattle water promised to developments going through the approval/construction phase but not yet online as water users. The Woodinville Water District has already conducted such an inventory and found the task to be quick and easy. A similar inventory could be conducted by other jurisdictions in a week if there were no political foot-dragging.

WAC 365-195-315(2)(a) requires an inventory of unused capacity of existing capital facilities, including water systems. Such an inventory would prove that there is no water to serve any of the alternatives in the DSEIS since all the water that can be saved by conservation has already been contractually promised to developments in the approval/construction pipeline.

The DSEIS is fatally flawed since it fails to discuss the adverse impacts of pressing ahead with any of these alternatives when there is no water to serve any of these alternatives.

Sincerely,


Joseph Elfelt
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Redmond, Washington 98053
206-881-8017



Office of Urban Mobility
1100 1st Avenue, N.E.
Seattle, WA 98101
206.462.3000

February 28, 1994

Lisa Madjiak
King County Planning and Community Development Division
707 Smith Tower Building
506 2nd Ave.
Seattle, WA 98104

Dear Ms. Madjiak:

This letter is in response to your request for comments on the scoping notice for the Draft Supplemental Environmental Impact Statement for the Countywide Planning Policies. While our comments primarily reflect issues directly related to the potential impacts of each alternative on regional travel demand we are also interested in the degree to which each of the five alternatives support adopted policies and on-going planning efforts at the federal, state, regional, and local levels. Specifically, WSDOT is most interested in supporting alternatives that are consistent with related aspects of the following policies:

- Intermodal Surface Transportation Efficiency Act (ISTEA)
- Clean Air Act Amendments of 1990 (CAAA)
- (Washington) State Transportation Policy Plan (STPP)
- Washington State Growth Management Act (GMA)
- Central Puget Sound - Vision 2020
- Regional Transit Authority (RTA)

These policies and planning efforts have the collective potential to provide some relief in the rate of increase in vehicle miles traveled (VMTs) on state facilities. To the extent possible comments are provided below for each of the five alternatives from this "policy-oriented" perspective. While each of the five alternatives attempts to preserve "rural lands and rural character", clearly the implications of the five alternatives on the regional transportation system will be vast. WSDOT also understands that the alternative economic development, rural task force, and affordable housing policies have a greater ability to encourage environmentally sound development patterns that do the alternatives themselves.

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Page 2

THE PRE-COUNTYWIDE PLANNING POLICIES ALTERNATIVE

This alternative appears to provide the least ability to direct growth into areas which already are well served by existing transportation infrastructure. It calls for the largest allocation of residential growth to rural areas and rural cities with a larger urban growth area based on the 1985 plan. Therefore it is highly likely that a great deal of additional transportation infrastructure will be required to serve this additional development. This alternative also calls for the least amount of mitigation for its development pattern of lower density land uses.

TX-19
The allocation of a significant amount of housing to outlying areas will result in an increased level of unbalance between jobs and housing. Census tracts in King County with an unbalanced ratio between jobs and housing have been found through empirical research to be associated with 28% longer trip lengths and 24% longer travel times for work trips than balanced tracts (Frank and Pivo, 1994). Therefore, the allocation of this amount of housing to areas with relatively little employment nearby will have the effect of causing a great deal of VMTs on state highways. This is of significant concern to WSDOT.

Relationships with Specific Policies

The premise of this policy which is to allow sprawl appears to be in direct opposition with Vision 2020 and the Growth Management Act. From the perspective of an agency whose mandates encompass the preservation and provision of regional mobility this alternative is problematic. At the federal level, ISTEA and Clean Air also register conflicts with this alternative. Eligibility for Federal Transportation Funding (and project prioritization) under ISTEA favors projects that are multi-modal in nature.

TX-4
The ability to effectively serve low density land uses resulting from this alternative by modes other than the SOV is difficult to demonstrate. This alternative is in this sense counter to the formation of an RTA whose mandate is to implement a regional transit system. This directly affects WSDOT which has a great deal of interest in the success of a regional transit system that can effectively serve regional travel needs. In addition, increasing trip lengths resulting from the dispersion of trip ends (as demonstrated above) would have the result of increasing VMTs. This increase in VMTs could have the effect of increased air pollutants.

NO ACTION ALTERNATIVE

By assuming the Countywide Planning Policies are in effect, this alternative appears to be more consistent with the intent of GMA than the *Pre-Countywide Planning Policies Alternative*. Under this alternative the urban growth area is smaller based on the work done under GMA. In addition, the requirement to "pay attention" to the countywide planning policies represents a departure from the *Pre-Countywide Planning Policies Alternative* towards regionalism. This shift is more favorable to WSDOT since we provide a regional function. However, without centering the primary development pattern that would result from this alternative is fairly consistent with the *Pre-Countywide Planning Policies Alternative* i.e. Sprawl. This statement is substantiated by the allocation of 65% of the employment growth in the county to areas that are currently "non-urban."

Relationships with Specific Policies

From WSDOT's perspective this alternative relates to specific policies at the federal, state, and local level in a similar manner to the *Pre-Countywide Planning Policies*. The exception is through the recognition of the Countywide planning Policies at the local level. At this level at least a countywide forum is available to work out regional issues.

THE 8 CENTERS ALTERNATIVE

Concentration of development into 8 centers plus 4 additional manufacturing centers provides a strategy that is a great deal more consistent with Vision 2020 and GMA than the *pre-countywide planning policies* and the *no-action Alternatives*. From WSDOT's perspective, the ability to serve additional development that is located within existing urban centers will most likely be less costly. Simply put, locate development in areas where there is already adequate public facilities ordinances are based. However, to be more realistic it is essential to factor in congestion and significant levels of air pollution within the 8 non-manufacturing centers.

The purpose of the RTA will be to provide mobility within and between these centers. The consolidation of uses within the 8 centers plus the four manufacturing centers provides the urban form that is necessary to make transit a viable alternative to the automobile. The development of an urban form (supported by this alternative) which makes alternative modes to the

SOV more competitive supports WSDOT's goal of maintaining regional mobility. The goals in the Washington State Transportation Policy Plan (STPP) encourage providing access to all opportunities for all persons. "All" here includes those persons that do not have access to an automobile. Centering, at its most abstract level provides the urban form in which access is possible through non-motorized travel (intra-center) and transit (inter-center).

THE 14 CENTERS ALTERNATIVE

This alternative proposes to consolidate an even greater proportion of additional development into designated centers. This alternative may be even more compatible with the RTA's objective of providing regional mobility through transit service than the *8 Centers Alternative*. This due to a potentially greater ability to collect additional development from nearby locations than from further away. Under this alternative more centers are proposed providing better coverage for consolidating development than the *8 centers alternative*. This alternative also makes a better "geographic fit" with transit corridors designated by the RTA. Again, WSDOT interests relate to the provision of regional mobility. Therefore, this alternative is highly favorable because of its consistency with the objectives of the policies cited above.

THE MAGNET ALTERNATIVE

The use of an incentive based approach makes a lot of sense from WSDOT's perspective because of our interest in travel behavior. Travel behavior or consumer choice relating to travel options is known to be a function of the relative costs amongst alternatives. This alternative represents a philosophy that can be useful to determine which actions or incentives will result in the least demand for the SOV. WSDOT is highly supportive of this approach to the extent that incentives to make locational decisions are based on objectives to foster environmental preservation and accessibility.

This alternative provides a useful approach that will be necessary to successfully implement the 8 or 14 center alternative. Inherent in least cost planning is the notion of efficient use of existing resources. WSDOT encourages this alternative to the extent it is able to encourage development concurrent with adequate transportation infrastructure. In addition, the use of performance monitoring techniques will be a necessary technique to gauge progress towards established quantifiable objectives for any of these alternatives or combinations thereof.

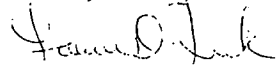
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CONCLUSION

In conclusion WSDOT favors the application of techniques identified in the *Magnet Alternative* to an alternative consistent with Vision 2020 (e.g. the two centers alternatives). WSDOT is aware that the ability each alternative presents to support and be consistent with the adopted regional plan (Vision 2020) is critical to elevate issues which are regional in nature (e.g. transportation).

Again, WSDOT is primarily interested in these issues to the extent that a relationship between a reduction in travel demand on state facilities is related with the urban form proposed by each alternative. In addition, WSDOT is also interested in the degree to which each alternative promotes improved level of service of alternative modes to the SOV. Please contact me with any questions that you may have at 464-5429 regarding these comments.

Sincerely,



LAWRENCE D. FRANK, PH.D.
Transportation Planner/GMA Specialist

cc: Renee Montgelas
Craig Stone
Ron Q. Anderson

**PUGET
POWER**

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FEB 23 1994

WASH. COUNTY

cc: Jim Rend

February 17, 1994

The Honorable Chris Vance
Councilmember, King County-Metropolitan Council
402 King County Courthouse
516 Third Avenue
Seattle, Washington 98104

Dear Councilmember Vance:

The following comments about the supplemental environmental impact statement for the King Countywide Planning Policies embody the themes I offered before your Growth Management committee last week.

As a member of the Fis/ED committee and the subcommittees that drafted the economic development policies and the benchmarks, I am pleased to note that the proposed economic development policies are stated within the document to have the most positive economic impact on the region. I encourage those of you who are members of GMPC to retain the policies as written. I think the policies are the result of broader-based experience than can result from the EIS analysis. Those persons who carefully crafted the proposed policies were fully aware of the consequences, schooled in the market effects and highly knowledgeable about the employment impacts of the policies. The team that drafted the policies included representatives of labor, real estate, industrial and commercial development, housing, utilities and the neighborhoods.

From Puget Power's perspective, we have some concerns about assumptions in Chapter 12, the utilities chapter. On page 151, it reads: "...it can be noted the more concentrated development in urban areas, where transmission and distribution systems are already in place, the more efficient and cost effective the delivery of utility services."

That statement is not supported by the facts. Frankly, we wonder from where this conclusion came. The conclusions are very different depending on a variety of factors: age of existing facilities, characteristics of new and existing load demand, the condition of the other utilities coexisting within the right of way, the nature of the easement or right of way and the ability to site new facilities in an already built up area. Puget Power's own internal analysis does not give us reason to make such a statement.

IS-4

On page 152, it is stated: "...in densely populated areas where greater energy efficiencies can be realized..." We do not know if greater energy efficiencies are possible in densely populated areas. The cost of installing equipment for heating multi-family or high-rise buildings with gas heat is so expensive that it is not cost-effective. Therefore, the densities projected, which require significant multi-family residential development, will increase the electric space heat load.

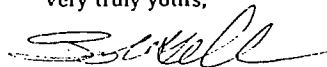
Page 153, another conclusion says "...to protect basic public health and safety, but not provide rural areas with urban facilities or urban levels of service." Not only does the document fail to define urban facilities, or urban levels of service, but that statement fails to recognize a provision of state law which prohibits Puget Power from offering differing levels of service (RCW 80.28.090).

Another statement within the utilities chapter makes some assumptions about the Master Utility Permit process that are premature. The MUP is evolving, as we speak, with the cooperation of service providers and DDES. We look forward to the discussions and what will result. At this time, we all hope that certainty of permitting, with regard to utility service to a plant or development, will result. But, to imply, as has the EIS, that this is a phasing document, is incorrect.

Puget Power does not offer comments on the value of centers, nor the correct number. That is determined by the policy makers. It is our state obligation provide electrical service for whatever land use plans are adopted.

Those Puget Power representatives who have been actively involved in growth management-related matters have found staff to be responsive to our inquiries. We don't always agree, but we do appreciate our working relationship.

Very truly yours,



Robert L. Gillespie
Manager/Local Government
Puget Sound Power & Light Company

cc: Kent Pullen, Chair, King County Council
Paul Barden, Chair, Fis/ED Task Force
Craig Larsen, Acting Director, Planning Department
Rita Perstac, Puget Sound Power & Light Company

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February 28, 1994

Mr. James Reid, Manager
Planning and Community Development Division
Parks, Planning and Resources Department
707 Smith Tower Building
506 Second Avenue
Seattle, WA 98104

Re: Comment to King County Draft SEIS for the Countywide Planning Policies.

Dear Mr. Reid:

The DeBartolo Corporation is the owner and operator of the Northgate Mall in Seattle and is very interested in the development of a realistic set of Countywide Planning Policies that would help guide the successful redevelopment of the Mall.

We are the attorneys for the Northgate Mall and on behalf of the owner make the following comments to the Draft SEIS on the Countywide Planning Policies.

The Mall is ranked as the fourth largest shopping center in the Puget Sound area. It is larger than Factoria, Crossroads, Bellevue Square and Alderwood. It is, and has always been, a regional shopping center. It is very appropriate for the Mall to be considered the key building block for one of the Urban Centers under consideration for management of the future growth in the metropolitan King County area.

The Final SEIS should address more fully than the Draft does, the fiscal, economic, and market factors which make a regional shopping center successful than does the Draft. We understand that the Fiscal and Economic Development Task Force is responsible for some of that analysis and we plan to share the Mall's perspective with the Task Force and make whatever contribution to their work that is appropriate.

As the Countywide Planning Policies are reviewed for possible amendment, we think it would be instructive for you to evaluate the City of Seattle's Northgate Comprehensive Plan as an example of one jurisdiction's approach to implementing the Urban Center strategy.

IN-5

Mr. James Reid
February 28, 1994
Page 2

In each of the Urban Centers the Plan must begin with a realistic assessment of the key building block that serves as the core of the center. We have identified some serious shortcomings in the Northgate Plan that if left unaddressed will undermine the concept of an Urban Village/Center in the Northgate area.

One of the most significant shortcomings is the application of the principle of "pedestrian orientation". The over reliance by the City planners on this concept has caused the City to change the zoning on the property to Neighborhood Commercial 3 (NC-3) from Commercial 1 (C-1). The result is a significant loss of flexibility on the part of the Mall to efficiently and esthetically redevelop in a way that responds to the reality of regional shopping centers. For example, Northgate Mall draws from the entire region and the principal mode of travel to and from the Mall will continue to be the automobile. Economically feasible management of customer access and parking is a key element of regional shopping center success.

The arterials in the Northgate area, particularly Northgate Way, are regional arterials and will be subjected to more intense use as the area develops. The idea of creating a pedestrian environment alongside those streets is not practical. The Countywide Planning Policies should include criteria to ensure the feasible application of the Urban Center concept by requiring that customer preferences and operational realities be recognized in the Comprehensive Plans.

Another concept that has drawn the planners to the NC-3 zone is the mixed-use assumptions in the Urban Center approach. As the City's recent study of mixed-use development shows, the "build it and they will come" assumption does not work. Nearly 47% of the commercial space in the mixed-use developments reviewed is vacant. The point is that the integration of residential and commercial uses must be done after a more in-depth analysis. The FSEIS should include an analysis of the practical limits to mixed-use development.

In addition to the zoning restrictions of NC-3, the Northgate Plan suffers from an over eagerness to make site specific decisions in the plan that should be left to the design stage. The defense is that the Plan provides more predictability by being more specific, however, the predictability sought by the development community relates to off-site mitigation costs, not to on-site design decisions. The Countywide Planning Policies should describe the level of detail expected in the Comprehensive Plans and sub-area Plans.

It is clear to everyone that the application of the Urban Center concept in Northgate will require a significant investment in transportation infrastructure. The perennial question of allocating the cost to the public and private sectors must be addressed in the Countywide Planning Policies. In the Northgate Plan the impacts to adjacent streets and intersections are determined in the same manner as on-site impacts as part of the development. The clear implication is that redevelopment or expansion of the Mall will be conditioned on the payment for the transportation improvements beyond the SEPA fair share requirement to mitigate future impacts. The

Mr. James Reid
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Page 3

improvements are regional in nature and should be publicly financed as a part of the value to the region of having Urban Centers.

The revised Countywide Planning Policies should provide a framework for the public/private partnership that will be essential to the successful management of growth in metropolitan King County.

Very truly yours,

PRESTON THORGRIMSON SHIDLER
GATES & ELLIS

By 
Peter J. Glase

PJG:cc
cc: Tom J. Presby
The Edward J. DeBartolo Corporation
J:\PJ\CH12300-90 003048.151.DOC

EC-11

2/27/94

TO: Jim Reid, Manager, King County Planning and Community Development

From: Virginia Gunby, 2540 N.E. 90th, Seattle, WA. 98115

RE: Review of DSEIS for the Countywide Planning Policies.
(January 12, 1994 due February 28, 1994)

Comments on the Draft SEIS of the Countywide Planning Policies

Policy Refinements

1. Rural Character-The countywide interest in promoting rural character should emphasize the objective of all communities to protect the Snoqualmie Valley drainage basin area and other major rural river basins and wetlands, from encroaching urbanization for as long as possible, through concentrating development in designated centers and denser livable communities within the urban boundary.

Rural character cannot be maintained if proposed increases in state highway corridor capacity continues to be built, due to the state setting obsolete level of service "C" standards that do not consider capacity management such as safety enhancements, short passing lanes, hill climb lanes, controlled access and local land use policies and linkages.

We have learned from other states that transportation concurrency requirements, if not monitored could push development into rural areas where capacity is not yet a problem. Developments with vested rights will impact the capacity of the system but are exempt from concurrency.

2. Affordable Housing-Working for Affordable Housing within the urban boundary and closer to jobs and employment, would be one of the best ways to reduce pressure to build low cost housing on cheaper rural land and increase auto trips. Strategies to ensure sufficient land, reduction of costs and funding incentives, such as reduction in transportation mitigation payments and EIS mitigation and concurrency costs to low cost housing developers, would assist the community in this challenging task.

3. Fiscal and Economic Development-Long term sustainable economic growth will be more feasible with the centers alternatives. Additional financial analysis will conclude 3 non-center options will require increased public funds/taxes to support capital improvements and promote additional sprawl.

Transportation Issues

The transportation elements of the separate comprehensive plans adopted by the county and cities will be measured against the policies and standards approved and ratified as part of the countywide Policy Plan framework. Many of the currently unanswered questions will be answered in the local comprehensive plans and the new PSRC and RTA regional transportation plans which will include in their mandatory transportation elements the following-

1. Land use assumptions used in estimating travel demand

2. Facility and service needs for attaining and sustaining level-of-service standards for arterials and transit routes.
3. Six year and annual financing plans based upon the needs of the comprehensive plan; reassessment of the land use element if level-of-service standards cannot be met with funding resources; this plan will be updated and adopted annually.
4. Intergovernmental coordination with adjacent jurisdictions; and at the county, regional and state level.
5. Transportation capacity and demand management strategies.

The state's GMA also requires the January 1, 1995 regulatory step to provide a means to deny development which causes the transportation level-of-service to decline below accepted locally adopted standards. More emphasis needs to be given to informing more people on the progress in developing a the process for concurrency, which will permit approval of development that is consistent with land use and planned improvements. Will the concurrency process be an effective tool to manage new growth?

Transportation projects and programs become a public financial commitment for each jurisdiction through the local CIP, to a range of the prioritized public improvements to be started within six years. In some cases this is a shared public and private cost, through the imposition of EIS mitigation and impact fees, depending upon the calculated impact of the new development upon the transportation system. (The exception would be vested development projects which would grandfathered in and exempt from this new approval process, even though it would impact the level of transportation service.)

Another exception is where the public agency cannot financially meet the capital project needs within 6 years. When this happens the development is probably denied and the zoning is changed to reflect the change. How will these exceptions influence the success of the countywide planning policies, particularly the rural policies?

The Countywide Planning Policies are more conceptual and less detailed than local comprehensive plans and transportation elements. The GMA requires the CPP contain policies to support

- the promotion of contiguous and orderly development and
- provision of urban services to such development, for siting public capital facilities of a countywide and statewide nature,
- for countywide transportation facilities and strategies for joint county and city planning within growth areas,
- and
- an analysis of the fiscal impact.

The process is new, untested and incomplete in King County. Therefore there is uncertainty with growth management steps and the results it will create. Fear and anxiety have been expressed by some for the unknown impacts and consequences of new planning policies and methods. Uncertainty is no reason to stall in the

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adoption of the CPP's or weaken the proposed countywide policies at this time.

The Draft Supplemental EIS provides additional, but incomplete comparisons of alternative growth concepts to improve the coordination and to permit the development of consistent and effective Comprehensive Plans at the local level. The adopted Countywide Planning Policies, and any refinements, will provide a preliminary framework for an evolving, dynamic and iterative process.

FUTURE GROWTH OPTIONS

Where the projected 325,000 more people and 215,000 more households and new jobs will locate in the next 20 years will have a profound influence in protecting the future quality of life within King County and the accessibility of all our citizens to their work, home, shopping and recreation.

The following are prerequisites to establishing improved accessibility and multi-modal transportation programs, rather than mobility in congested, auto-oriented sprawl within disrupted, unlivable communities and neighborhoods, that have no alternative to the auto.

Urban Growth Area-20 year Projections

1. Defining a relatively stable Urban Growth Area in the western part of King County that meets the projected 20 year needs of the area is very important for our future quality of life and the type of transportation system that will evolve from that decision. (A procedure should be included for amending the UGB after we have gained five or ten years of experience with monitoring the effects of the new adopted countywide policies and local comprehensive plans.)

Existing Urban Centers and Density

Encouraging housing, employment and other economic growth through increased density in existing centers, whether there are 8 or 14 centers or something in-between will redirect and influence the future patterns and location of growth. Promoting existing centers is directly related to protecting the rural resources and character.-- agricultural, forest, open space, critical steep slopes and wetlands.

Transportation is a TOOL to Implement Effective Land Use Policies
Coordinated multi-modal transportation systems, aggressive demand management policies and programs, growth management policies and regulations and prioritized capital investment program are effective public tools to implement the recommended "Vision for King County in 2010", and beyond.

Transportation Benchmarks and Monitoring Policies in FEIS

The ultimate allocation of households and employment within proposed and existing centers should be based upon a range of criteria to achieve the goals of the state's growth management act. I agreed with the SEIS's qualified finding that all alternatives would be benefited by additional consideration of economic incentives and disincentives in addition to the monitoring and benchmark program. This is broader than those recommendations suggested to serve the Magnet alternative. Though agreed upon benchmarks to guide us in the future we can

be more assured that we are positively meeting our objectives. (Even though it is politically dangerous to keep a record of past errors.)

It will not be a perfect, predictable, quantifiable and static process with absolute certainty. It is a dynamic process of iterative refinements and updated plans and policies to meet changing times and conditions. The policies and procedure must be flexible enough to permit future revisions to respond to changes in our economic, social, political and environmental values in the future.

Emphasize Alternatives to the SOV

Three of the five alternatives, No Action, Pre-CPP and the Magnet alternatives provide little or no effective, and supportive growth and development policies to implement multi-modal transportation policies and promote cost-effective major transit improvements, be they a regional bus, HOV or rail programs. Only through the effective implementation of a centers alternative, preferably a refined 14 center alternative, can the jobs/housing balance and other development density thresholds and objectives be met to promote the increased use of transit, pedestrian and non-motorized alternatives. The refined centers alternatives with additional emphasis upon goals and programs for reducing or replacing auto trips, and vehicle miles travelled and aggressive parking management, CTR etc. policies and programs could provide for a significantly decrease in vehicle trips and vehicle miles travelled in the county, on north, east and south transportation corridors and within communities.

One of the reasons why it is important to support a refined centers alternatives, is because of the positive impact on encouraging change of lifestyles and habits to promote pedestrian oriented communities and a alternatives to the auto.

Least Cost Planning

LCP "is a comprehensive, technically consistent planning method that provides an economic framework to assess the cost effectiveness of all transportation modes, and management strategies while taking into account all societal costs." (Dick Nelson and Don Shakow, February 1, 1994, Applying Least Cost Planning to Puget Sound Regional Transportation, Institute for Transportation and the Environment)

It has been successfully used in the development of conservation programs in Northwest power planning, and provides a new and innovative model to evaluate and compare the overall costs and benefits of various transportation options. It looks beyond the individual legal, jurisdictional and administrative boundaries, to develop comprehensive alternative transportation funding packages and projects and programs.

On Page 111 in the SEIS Introduction, the statement is made that Least Cost Planning for the Magnet alternative avoids evaluating new infrastructure and concentrates on TDM. This statement is incorrect definition of LCP and misrepresents the broader LCP transportation modelling process, which includes an evaluation of new infrastructure with other non-capital intensive alternatives. The concepts of LCP should be incorporated in to the future

fiscal analysis, as the recommended countywide planning model is refined, and at the Regional Transportation Plan level.

Transportation Models

Even though there has been no transportation modelling for the individual growth alternatives, due to the size of the area, it would be worthwhile to have comparative analysis of the growth alternatives within smaller prototype areas. From the models, the impacts of the alternatives upon the future transportation service and performance, levels of service for urban and rural land use etc. could be available for review. Policies to reorient the level of service "highway-oriented" measurement to a "Transportation Adequacy Model" that includes consideration of transit, non-motorized projects, aggressive TDM policies, as well as highway service improvements to centers. We need to evaluate how these alternatives would impact future transportation patterns, and if they would revise the projected travel by auto.

(It is assumed that the centers "vision" could not be assured without significant public consensus to fund increases in transit service and programs to the designated centers, which agreed to target growth, density jobs, housing and development to enhance the cost-effectiveness of transit.

Capital Planning Process Needs to be Coordinated

The GMPC recognized the need for greater coordination for county wide capital programming. Major capital proposals from cities, the county, University/Colleges, public schools, regional and state projects could be reviewed for their consistency with the adopted countywide policies and plans, and for evaluating the appropriate method of funding, for those proposals which will require a public ballot.

The process in the future could include a more collaborative prioritizing of all major capital improvements that are consistent with the Countywide Policy Plan and local Comprehensive Plans. This process could be developed by the new Regional Policy Development Committee of the reorganized Metropolitan King County Council. In addition, the proposals could be evaluated using the least cost planning method to provide better more complete information on the appropriate method of funding, particularly for those proposals which will require a public ballot.

In addition, the same type of oversight process could add an evaluation of the impacts of the unforeseen new major public investments from federal, state, regional and local and private master plan developments, and/or commercial industrial developments could be included as part of the future monitoring system.

Improved Public Process

Up to now the Countywide Policy Planning process has not been noted for involving the citizens of King County. An important part of any recommended center's alternative relies upon alternative modes of travel, changed employment surroundings and for some, a change from lower to higher density housing. Only through public information and involvement and gaining ownership, in new concepts, as we have done on health issues such as, drunk driving, smoking, and others such as recycling of waste and

conservation of electrical power, are we able to change individual's and community values, perspectives and lifestyles to promote a vital, well planned and sustainable community. Northwest residents if informed, are environmentally conscientious and interested in protecting our rural and natural environment, and improving our cities urban qualities.

New opportunities are emerging to develop a coordinated countywide public process at the community level to collaboratively explore "How our county will live, travel work and play in 2010 and 2020? The State CMA requires additional coordination with other agencies plans such as King County cities WASHDOT, the Puget County Regional Conference and the Regional Transit Authority RTA, and local cities who are now all involved in separately updating and revising their respective transportation plans. Why not work together for change, rather than in separate fragmented and duplicative public financed processes?

Final Comments

The FEIS could provide more information on the following issues-

- monitoring the pitfalls of countywide growth management policy programs in other states, to prevent similar problems in King County
- development of a countywide comprehensive capital improvement review process to support the countywide planning policies,
- recognition of the need to improve the linkage of land use to transportation and coordinate with the state, regional and local agencies on a countywide basis to develop an aggressive TDM programs to reduce parking, trips and SOV vehicle miles travelled by 2010.
- additional analysis of effective policies, incentives, disincentives and regulations which would encourage infill, and concentrated mixed used activity centers, as opposed to continuation of existing low density and increased VMT trends.

Thomas C. Harman
2302 W Beaver Lake Dr. SE
Issaquah, WA 98027

February 28, 1994

Jim Reid, Manager
Div of Planning and Community Development
707 Smith Tower
506 Second Avenue
Seattle, WA 98104

Ref: Draft Supplemental Environmental Impact Statement
for the Countywide Planning Policies.

Dear Mr. Reid:

I want to take this opportunity to comment on the DSEIS on the Countywide
Planning Policies

URBAN GROWTH AREA

(1) Why do all the alternatives use the same Urban Growth Boundaries. The placement of the Urban/Rural line was arbitrary with no environmental review. At the start of the GMPC process there were three alternatives each with different UGA's defined. The 14 center alternative used a tight UGA placing all of the East Sammamish Planning Area into a rural-designated area. The 8 center alternative placed the eastern half of the Sammamish Plateau into rural. How can true impacts be assessed unless there are different UGA for each alternative.

(2) The impacts to urban areas not included in the 8 center or 14 center alternatives are not defined. There is no phasing. It seems that the urban areas will be built out in 5-10 years unless growth is phased into the center. Will infrastructure go into the center while growth is at the edges?

(3) On page 19, the GMA defines urban growth as "Growth that makes intensive use of land for the location of buildings ..." RCW 36.70A.030 states that "Urban growth typically requires urban governmental services." How can properties such as the Aldarra Property in the Snoqualmie Valley qualify as URBAN? or why does Preston, next to Interstate 90, with its office parks, qualify as RURAL? Why do all the alternatives perpetuate the sprawl of the 1985 Comprehensive Plan?

2

(4) 8 center alternative Page 36 - "Areas outside the urban centers without a full range of urban services, but within the UGA are allocated less growth." If urban services are not available, why are these areas designated urban? Will they be developed at low density thus increasing land consumption?

IN-6

(5) How can the true impacts of the Magnet Alternative be assessed where we don't know where the magnets are. For example is Pine Lake a magnet?

(6) I do like the performance standard methodology of the Magnet Alternative which should be added to all alternatives.

LACK OF FISCAL IMPACTS

(7) Page 3 Scope of Environmental Review states "First, this document does not contain analysis of fiscal impacts or market feasibility information."

WAC 197-11-440(6)(e) states:

"Discussion of significant impacts shall include the cost of and effects on public services, such as utilities, roads, fire, and police protection, that may result from a proposal."

(8) What is the meaning of the statement on Page 51.

IN-4

"Providing increased spending for public infrastructure and services to support new development in urban centers and designated portions of the UGA."

Without a cost analysis, it is impossible to access where and how these expenditures will occur.

AFFORDABLE HOUSING

(9) The whole affordable housing assumptions in the DSEIS are flawed and assumes that everyone either wants to or has to live in multifamily housing. The mitigation measures on pages 69-71 seem to center on density and lower mitigation payments. This will result in increased environmental degradation, school overcrowding, and a shift of the tax burden to existing homeowners. This will make housing unaffordable for existing homeowners and will drive those we are trying to help from their homes. These methods were tried unsuccessfully in California in the 1970's.

HO-6

COMMENTS ON DRAFT SEIS

(10) The best and cheapest mitigation for affordable housing would be the introduction of a 60 year mortgage for first time home buyers. This method is used in Japan. This would encourage home ownership and the renovation of existing homes. We need a complete rethink of housing with banks and government working together as they did in the 1940's and 1950's.

(11) It is essential that we keep Seattle as a livable city and resist the temptation of sprawl. Seattle must be the place where everyone wants to move to with shopping, the arts, sports and an excellent school system. If we move affordable housing to the Sammamish Plateau then people will want to leave Seattle. Infrastructure dollars and political power will also leave.

STORMWATER MANAGEMENT

(12) page 132 - Add "*East Sammamish Basin Plan (Ordinance 11111 not yet codified)*" to the affected environment section.

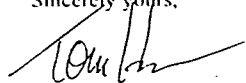
(13) page 138 - Add "*Significant investment in capital projects will be necessary in the future to expand storm water facilities and conveyance systems.*" as an unavoidable impact.

UTILITIES

(14) page 153 - "*The hazards of EMI radiation should be added as a significant impact of upgrades to the regional transmission grid.*" as a significant impact.

Thank you again for the opportunity to comment.

Sincerely yours,



Tom Harman

LA-4

1. The whole CPP concept depends on key assumptions regarding the true capacity numbers, but the capacity discussion is inadequate and incorrect. There is no explanation of the basis for the recommendation of a 25% "cushion" for the capacity numbers. There is no discussion of the effects of under or over-estimating the need.

The SEIS is under-estimating for several reasons.. Most of the good developable land has been used and the environmental, political, neighborhood and market factors will require far greater discounts than the ones being assumed. Also, there will not be adequate public funds to provide the infrastructure needed for many urban sites. Even infill sites will require large expenditures, especially in light of existing deficits in many areas.

A logical question then is: what do we have to lose if we had even a 75% cushion to cover these uncertainties? With today's concurrency requirements and impact fees, there is little to be feared from an over capacity - other than having too much affordable housing for our people. On the other hand, the literature is full of evidence that too little capacity increases the cost of housing and the amount of homelessness.

LA-11(d)

2. It is assumed, with no evidence or explanation, that without extreme governmental intervention in the market through the CPP's we will have a continuation of the low density development patterns of the 1980's. This assumption is illogical and ignores the evidence of new trends in the 1990's. It is like driving by looking in the rear view mirror. It also ignores the fundamental nature of the development process: the pattern of development is not the result of the whim of builders. Rather, it is a function of the market (i.e. what people want) and of governmental regulations.

As land prices have skyrocketed due to downzoning, the SAO and other governmental regulations, the market has changed. Most people can no longer afford the size of lots and homes built in the 80's. As a result, builders have gone to smaller lots and houses and are trying to reduce the size of roads and other improvements. Even a cursory review of industry publications or proposed new projects will substantiate that building for higher densities is the theme for the 90's.

At the same time, the new county zoning code has dramatically changed the rules and now encourages higher densities. Most cities are going in the same direction. There will be further pressure to increase densities as people are having to buy farther out and commute long distances to work. New approaches to transportation planning and infrastructure, together with laws such as the Commuter Trip Reduction Act, concurrency requirements of GMA and the ISTEA will all encourage higher densities closer to employment and transportation corridors.

LA-11(d) HO-6 IN-4
3. Therefore, we need to analyze the likely alternative development pattern [under Alternatives A or E.] It will have much more density, mixed uses and clusters along existing transportation corridors. In short, it will be much different than in the 80's and will continue to change in this direction. True, it will not reach overnight the drastic changes sought in the CPP's, but then neither will the CPP's. The entire analysis of impacts of the CPP's depends upon the assumption that merely mandating certain types of housing patterns, affordable housing and employment growth will work. Yet the SEIS on p. 128 specifically disclaims any analysis of the two most important issues supporting this assumption: the ability of public finances to deal with growth (fiscal impact analysis) and the economic feasibility of the alternatives and their inherent policies. The SEIS is useless unless you are willing to accept the answers to these questions solely on blind faith. Shouldn't we take the time to analyze and reach agreement on these issues before we spend the time and money to construct an entire plan for this region?

EC-2
4. The SEIS assumes that there will be no significant effect on the economy of King County by any of the alternatives. Apparently no one has bothered to ask Boeing or other major employers what they think about this assumption.

LA-4
What about the problem that we may drive business to other areas? No problem, the SEIS just assumes this issue away: "Policies which are perceived to direct economic development to other areas may be mitigated by other counties having similar economic development policies," p. 130. This assumption is dubious and ignores the option of moving to other parts of Washington or to other areas, such as Wichita.

HO-6
How about driving housing to other areas? It acknowledges that the industry has made this argument, but it just assumes the problem away: "this is uncertain and will depend, in large part, on the policies adopted in those counties and on the degree of cooperation" by surrounding counties," p. 65. It then totally disregards the empirical data from 1991 to 1993, including numerous industry and media reports, and says only that the 1984 to 1990 baseline data is "inconclusive" on this trend.

How does the SEIS explain why there will be no regional impact? Again, by the assumption in this curious non sequitur: "The focus of VISION 2020 is on managing regional growth, rather than on attempting to control the overall amount of growth or its timing. As a result, no alternative under VISION 2020 is expected to significantly affect the region's economy," p. 130.

LA-11(a)
5. The entire discussion of compact development on pp. 64 - 65 is strained and obviously skewed to support a predetermined conclusion. We deserve a more rigorous analysis and review of the literature. General statements such as "all of these impacts can be mitigated to some extent" are totally useless.

LA-6

One major assumption, that the long-term public and private costs of serving new development will be less in dense urban centers, has no supporting data. It simply says: "Although the research literature suggests that this is a complex issue, there is a substantial body of work which suggests that the per unit costs of serving new growth are lessened at higher densities," p. 64. This ignores the issues of curing existing deficits (e.g. roads, parks, public safety and schools) in dense urban areas. It also ignores the extra cost of different construction techniques and of retrofitting existing facilities such as roads and sewers rather than building new ones. It is irresponsible to push a plan without first getting a better understanding of these key numbers.

6. The discussion of affordable housing disregards the numerous studies [I can gladly give them a list to review] that have looked at this issue locally and nationally and ignores the lesson we learned in "Econ 101": although costs will set a minimum, price is essentially a function of supply and demand. Surely no one on this task force seriously disputes this formulation [if so, we should get that resolved now.]

Nevertheless, the SEIS ignores supply and only talks about demand: "market forces, such as increases in employment and population, are the principal factors which drive prices up in any growing region." This is absurd because the key factor is not growth in demand, but the balance between supply and demand. This entire discussion is flawed by this basic misunderstanding and it therefore concludes that we just can't get affordable housing under any of the alternatives because we will have growth. pp. 183 - 184. It further concludes that these "market forces" [i.e. demand only] "are on the order of ten times the impact of housing policies on housing affordability." What about the obvious fact that we can choose to increase the supply? Shouldn't this at least be studied and evaluated even though it may conflict with the philosophy and other beliefs that the GMPC would like to have substantiated?

I had a very limited time to review the draft, but I expect I will have further comments regarding the inconsistencies and errors in the Appendices.

Respectfully Submitted,

Joli Imperatori
Economic & Environmental Balance Council



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February 11, 1994

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Planning & Community Development Division
Parks, Planning & Resources Department
Ms. Lisa Majdiak,
Growth Management Project Supervisor
707 Smith Tower Building
506 Second Avenue
Seattle, WA 98104

RE: DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT
FOR THE COUNTY WIDE PLANNING POLICIES

Soos Creek Water & Sewer District would like to correct an omission in the Draft SEIS, dated January 12, 1994.

Per today's telephone conversation with Karen, I would like to provide you with the information that is missing from this document.

In the second page of Appendix I - Sewer/Septic, Soos Creek Water and Sewer District is listed, but there is no data showing the adoption of our comprehensive plan in Table I-1.

The following information is provided to update the Draft SEIS.

Date of Plan: 1987
Adoption Date: 11/8/88
Ordinance #: S722
Amendments: 7/2/90
Ordinance #: 9514

Please contact me if you have any questions regarding the above.

Anna Iordanidis
Anna Iordanidis
Manager
Human Resources/Administration

cc: John Roth, Jr.
Hedges & Roth Engineering

NS-8

IN-4

IN-1

LA-17

LA-25

FROM: Marina Kesting, 19241 NE 192nd St., Auburn, WA 98001
TO: Mr. Reid, Manager, Planning & Community Development Division
Parks, Planning & Resources Department, King County

RE: Comments on 1-12-94 DRAFT SEIS FOR THE COUNTYWIDE PLANNING POLICIES

Since my 13 pages of SCOPING COMMENTS were not addressed in either the county's basic referenced documents, nor in the current document cited above, I request that they be incorporated by reference as part of my comments now. (This is a highly unsatisfactory DSEIS in that no one's scoping comments were recognizably addressed, and people brought up very important issues which remain unanswered.)

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FEB 26 1994

COMMENTS IN ADDITION TO THE 13 PAGES:

In Barrie v. Kitsap County (93 Wn.2d 843, 613 P.2d 1149) the court declared RCDD 197-10-220 and WAC 197-10-226 invalid because they conflicted with SEPA policy RCW 43.21C-020(1)(c) in that economic and social effects were not discussed in the governmental EISs. This DSEIS is likewise deficient in not discussing the social and economic impacts, on both the private sector and on the public tax base, of countywide planning policies affecting land use.

SNORELINES. On LAND USE page 21, footnote⁵ references the public access provisions contained in King County Shoreline Master Program Draft Amendments, March '92. These amendments, calling for public access trails on private property along significant shorelines, including Lakes Washington and Sammamish, with physical access improvements to be constructed by the landowners at their own expense, will have severe social and economic repercussions if adopted. Yet those requirements are not even spelled out, let alone analyzed.

FORESTS. LANDUSE page 21 also says that eleven acres "is considered too small for efficient management of land for commercial forestry", while SENSITIVE AREAS AND RESOURCE LANDS page 161 says "King County also has extended its current use tax program for timber (RCW 84.33) to include forest parcels between 5 and 20 acres in size in the Rural Area . . ." Since the Rural Task Force discussed forestry in the Rural Area as one of the few allowed land uses, a discussion of the economics of forest use on small parcels is needed.

MAXIMUM CLEARING LIMITS. There is no discussion of the economic impacts of minimal allowed clearing for proposed new farming and forestry activities in Rural Areas (RU-9). There should be a thorough discussion of techniques that "protect the natural environment", while allowing the MAXIMUM clearing required by economically-viable forestry and farming. This is an important, unrecognized contradiction that needs to be cleared up.

EVALUATION OF RURAL TASK FORCE LANGUAGE. Page 7 of the RURAL CHARACTER TASK FORCE listing of Draft Recommended Refinements to the Countywide Planning Policies requests an evaluation in the SEIS of allowing only "active farming, forestry, and/or ecological restoration and stewardship", with residences to be allowed only where landowners provide those activities. Also recommended is densities of one unit per 20 - 35 acres. I did not find the requested analysis, which is absolutely necessary because of the extreme social and economic effects if adopted.

LAND CAPACITY DATA. LANDUSE page 21 says that the dwelling-unit-capacity Table B3 does NOT take into account the downzoning required to preserve rural character in the 49 square miles of "new rural" area, which "would reduce capacity by about half in that area". In the Bear Creek planning area the downzoning was from urban horse acres to 5-acre minimums, which is a much greater reduction than "about half". A detailed analysis is needed of precisely how much density is lost to that downzoning, plus an analysis of the economic effects on land prices and tax base, and the social effects of shutting thousands of families out of the "new rural" areas which, in 1985, were not considered important for inclusion in the 1985 Complan Rural Area.

1989 FEDERAL MANUAL FOR IDENTIFYING WETLANDS. Page 157 of the SENSITIVE AREAS AND RESOURCE LANDS section mentions that "not all jurisdictions currently use the 1989 Federal Manual. Some jurisdictions use the 1987 Federal Manual. There should be an economic analysis of the differences between those two manuals, since the countywide planning policy CA-1 mandates use of the 1989 Manual."

There are other objections, but I've run out of time. I will deliver this today in order to meet the submission deadline. (This DSEIS is HARD to comprehend.)

Marina Kesting



City of Des Moines

COMMUNITY DEVELOPMENT,
PARKS AND PUBLIC WORKS
21650 11TH AVENUE SOUTH
DES MOINES, WASHINGTON 98198-6317
(206) 878-8626 FAX: (206) 870-6544



February 28, 1994

Jim Reid, Manager
Planning and Community Development
Division
707 Smith Tower Building
506 Second Avenue
Seattle, WA 98104

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FEB 28 1994

Re: Supplemental Environmental Impact Statement to the Countywide Planning Policies

Dear Mr. Reid:

Thank you for the opportunity to comment on the amendments to the Countywide Planning Policies (CPP's). I have reviewed this document with my council and our comments are detailed as follows.

The first comment relates to the receipt of this document. The SEIS was issued on January 12; we, however, received the document on January 22. Although we have reviewed the SEIS as thoroughly as possible, a full 45 day review period would have been preferred.

As a whole, I am disappointed with the document. The SEIS only compares the amendments to the CPP's among themselves. A quantitative and qualitative analysis of these alternatives on the environment is still needed. How do you know which alternative will have less impact on the environment than another? Where is your data? Where is your analysis? Where are your mitigation measures? At this point I do not expect you to have definitive information. I do believe, however, the citizens of King County deserve more information than what is contained in this document.

I am also very concerned with the lack of supporting data and substantive information throughout this document for the comparisons you make. Without this information I am unable to make a reasonable analysis on the information presented in this document. I am particularly concerned with the lack of analysis of the magnet alternative and the associated least-cost-planning concept which may be the most rational alternative given our probable future of dealing with diminished resources.

In my review of the SEIS I am also disquieted that these amendments are still attempting to dictate local zoning and land use policies by proclaiming poorly documented, insufficiently analyzed and completely unfunded edicts with the expectation that the local jurisdictions will somehow find the resources to implement these policies. Requiring a

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jurisdiction to provide higher density zoning to achieve land development and land capacity targets is not a mitigation measure, it is an impact which requires careful analysis.

HO-3 Under the Affordable Housing element, there is insufficient substantive information on the number of people needing affordable housing in the future. The county's definition of "affordability" may also be overly conservative. Many homebuyers, especially first time buyers, are able to purchase a house with significantly less than a 25% downpayment. I am also concerned that the major mitigation measure relies on changing the minimum density in residential zones. Many other mitigation measures are available, why aren't they discussed? My major concern, however, is focused on the subject of gentrification. It is stated that an unavoidable impact of the affordable housing policies is that gentrification may occur in urban centers. More than the fact this statement is incredible (these policies may cause the very thing that they are suppose to help prevent), no mitigation measures are offered. I strongly state that gentrification is not an unavoidable impact. Where will these people go? How many poor people may be displaced? What services will be available to them?

HO-12

The analysis of the impacts transportation may have on the environment still presents an over-reliance on the development of a rail system. There is a clear lack of analysis on alternatives which do not include development of this type of system. The mitigation measures in this analysis are also underdeveloped. Recommending telecommunication as a tool is a good idea, but is it a reasonable mitigation measure? The SEIS also states that even with a rail system Vehicle Miles Travelled(VMT) will increase. How will local jurisdictions deal with these impacts if the majority of the financial resources are targeted for a rail system?

Under the Human Services and the Police/Fire/Emergency Response elements, analysis of the impacts of these amendments are, at best, lacking. Recommending a provision of public space to non-profit providers for human services for example, is not enough.

The SEIS discussion on the impacts these alternatives will have on schools is one of the weakest. In every alternative, from no action to the 14 center alternative, there is a significant negative impact. The only mitigation measures presented are instituting impact fees and the recommendation that school districts and local governments work closely together on land use plans. This simply is not enough.

Throughout the discussion of the impacts these alternatives may have on the water supply, stormwater management, and water quality there is little analysis of the impact 300,000+ people will have on these systems. Conservation is certainly a mitigation measure, but it cannot be our only alternative.

Under the solid waste discussion, stating that all the alternatives concentrate growth in employment and households in urban areas where existing services are in place or can be easily extended is clearly not

February 28, 1994
Page 3

enough of an analysis. Where will the waste go after we pick it up? Waste reduction and recycling is a good start but it cannot be the only mitigation measure. Likewise, stating that significant investment in capital projects will be necessary in the future, without providing recommendations on where and how these projects will be located and funded is inadequate.

NS-30 One of the most important areas missing in the SEIS is the impact noise may have on the center alternatives. I am especially concerned with the potential effects of aircraft noise on the proposed Federal Way and SeaTac centers. Are we really going to inflict significantly larger numbers of people to the effect of SeaTac Airport? Can we mitigate for noise and still comply with the affordable housing policies (because noise mitigation significantly raises the cost of housing)? Can parks and open spaces be usable in a 65Ldn noise area? These questions need to be addressed prior to designation of these centers.

In conclusion, this letter is not meant to be an attack on the center concept or the Countywide Planning Policies. It is a plea that we adequately and thoroughly evaluate these alternatives today in order to ensure the highest quality of life for our citizens tomorrow.

Sincerely,

Judith S. Kilgore
Judith S. Kilgore
Director of Community Development

jsk
cc: City Council
Greg Prothman, City Manager

jsk/

FAKED 2-28-94

RECEIVED

FEB 28 1994

1:00

February 25, 1994
King County Urban Groundwater Purveyors

C/O East King County RWA
1309 114th Ave SE, Suite 300
Bellevue, Washington 98004

C/O South King County RWA
13335 SE 248th Pl
Kent, Washington 98042

Lisa Majdiak
Growth Management Project Supervisor
King County Planning and Community Development Division
707 Smith Tower Building
506 Second Avenue
Seattle, Washington 98104

Subject: Comments on the Draft Supplemental Environmental Impact Statement for the Countywide Planning Policies

Dear Ms. Majdiak,

The King County Urban Groundwater Purveyors are concerned about protecting the quality and quantity of aquifers that serve the water supply needs of urban areas and provide base flow for rivers, streams, and wetlands. The importance of aquifers to the citizens of King County cannot be overemphasized. Aquifers are the source of drinking water for approximately 390,000 people living within the urban areas of King County. Collectively we pump about 50 million gallons of groundwater per day which accounts for approximately 22% of the average total urban water demand. Aquifers serving urban areas are commonly recharged locally, that is within the urban growth area.

IS-6

We have concluded, upon careful review, that the Draft SEIS does not adequately assess the impact of the alternatives on groundwater quantity both from the standpoint of recharge and demand. Our concern is that decisions will be made without adequately considering these important issues. The inadequate assessment of groundwater quantity issues may stem, in part, from the lack of policy direction contained in the Countywide Planning Policies (CPPs). Therefore, we have also evaluated the CPPs in relation to our concerns. We generally support the existing language in the Aquifer section regarding implementation of Ground Water Management Plans. We believe, however, that additional aquifer protection guidance should be provided by the CPPs.

This letter contains our general comments on the SEIS and our requests for revision of the Aquifer section of the Countywide Planning Policies. We also include our comments on the findings of the Rural Character Task Force. The rural area is of concern to urban groundwater purveyors because recharge areas for aquifers used for urban water supplies are also located there. Rural area aquifers also provide base flow for tributaries that are important for the spawning of endangered anadromous fish.

This letter is accompanied by a map of large water supply well locations and water service areas. This map illustrates the importance of groundwater by showing the substantial portion of King County that is served by groundwater purveyors. A second countywide

map showing aquifer recharge areas is needed. Although several groundwater purveyors have prepared recharge maps for their own areas and others are working on them, a countywide map does not exist. A countywide map of recharge areas should be prepared as soon as possible. This map should incorporate the maps prepared by groundwater purveyors as part of the purveyor's wellhead protection program upon concurrence by King County and affected cities. King County and cities should include recharge areas in sensitive areas folios and continually update them as new information becomes available.

Aquifer recharge area maps can enhance aquifer protection efforts in at least three ways:

1. The maps provide important guidance at the planning level for County and city elected officials, planners, and others who make decisions regarding future development and water resource management.
2. County and city environmental reviewers can use the maps to enhance review of development in aquifer recharge areas. By designating these areas as Environmentally Sensitive under state SEPA regulations, the County and cities can eliminate selected categorical exemptions to environmental review. This will enhance local government's ability to adequately consider impacts upon aquifers prior to issuing permits for development. Guidance should be developed by King County, cities, and groundwater purveyors for use by environmental reviewers to ensure that appropriate mitigation is included in permits for development.
3. The County and cities can adopt development standards for Environmentally Sensitive Areas under the advisement of groundwater purveyors and other interested agencies and individuals. These standards would be used at the permitting level to protect aquifers. Standards should contain a provision enabling permit applicants to submit site-specific information that may be more accurate than large scale maps. This information could be used to determine whether to relax standards on a case-by-case basis.

A. GENERAL COMMENTS ON THE SEIS

1. An assessment of land-use impacts upon groundwater recharge should have been provided in the Water Supply chapter. The assessment is needed so that decisions regarding the alternatives can be made with knowledge of impacts upon groundwater-based water supplies. At least the following factors potentially resulting in loss of recharge should be assessed for both urban centers and the areas immediately surrounding them that will inevitably be impacted:

- a. Extent and general location of impervious surfaces;
- b. Sewering of areas that are presently served by on-site sewage disposal systems;
- c. Modifications to stormwater systems; and
- d. Loss of natural areas.

The SEIS should discuss the relative merits of methods to mitigate impacts upon recharge. For example, the maintenance of low density, low-impact development in

urban separators is a mechanism to enhance aquifer protection efforts in urban areas. Engineering controls can be used to partially mitigate the impacts of development where low density, low impact development cannot be accommodated. Engineering controls include the following and other techniques:

- a. Aquifers may be artificially recharged with surface water piped from distant sources.
- b. Stormwater and septic effluent may be used to supplement recharge where this may be done without impairment of drinking water quality.
- c. The use of off-site and regional stormwater infiltration facilities offers an opportunity to mitigate the impact of development on ground water recharge.

IS-4 Costs and other feasibility issues associated with the replacement of existing water supplies should also be discussed.

2. The SEIS states on page 127 that "Other independent water purveyors are evaluating whether there is adequate groundwater to meet the demands for increased water supply in their individual service areas." The implication is that the SEIS will not assess impacts upon demand associated with the alternatives. To our knowledge, groundwater purveyors are not involved in formally assessing the impact of the alternatives upon demand in their service areas nor has there been formal communication between groundwater purveyors and the Growth Management Planning Council regarding demand issues.

IS-2 The SEIS should demonstrate that groundwater purveyors can meet the additional demand for the chosen alternative. Lost recharge due to changes in impermeable cover or other impacts of development must be factored into this analysis.

3. The following statement is made on page 175: "Existing wastewater and drainage systems are degrading water quality thresholds and extensive capital improvements will need to be made in some areas to accommodate growth and improve water quality." This statement is too vague. What systems are degrading water quality and where is this occurring? Is the impact upon surface or groundwater? Is the impact upon drinking water or upon water quality in general? What evidence is provided to show that this is occurring?

IS-16

4. Also on Page 175 a number of water quality programs are mentioned. The Ground Water Management Program of the Seattle-King County Department of Public Health in cooperation with the Department of Ecology, cities, and water purveyors should be noted. This is a very important local program to protect groundwater. Local governments must adopt or amend regulations, ordinances, and/or programs in order to implement Ground Water Management Plans following certification by Ecology in accordance with WAC 173-100-120.

IS-23

5. It states on page 179 that the Ground Water Management Act is administered by the Washington Department of Health. We are not aware of an Act of this title. "Ground Water Management Areas and Programs" (WAC 173-100) is administered by the Department of Ecology. It is based upon RCW 90.44.400 "Regulation of Public Groundwaters".

IS-24

B. REQUESTS FOR REVISION OF COUNTYWIDE PLANNING POLICIES

The revisions to the Countywide Planning Policies shown below address our concerns. The text in the box is taken from the Aquifer section of the CPPs with additions and deletions as noted. Revisions should be checked against policies contained in other sections in the interest of consistency.

AQUIFERS

Currently, there are five Ground Water Management Plans being prepared underway in King County: Redmond, Issaquah, East King County, South King County, and Vashon. Most, but not all, important aquifers are contained within these areas. The state Department of Ecology has designated Seattle-King County Department of Public Health as the lead agency. Each plan is prepared in conjunction with an advisory committee with representatives from suburban cities, water utilities, businesses, private well owners, environmental groups, and state agencies. The plans will identify aquifer recharge areas and propose strategies for protection of aquifers groundwater through preservation and protection of groundwater aquifers. Local governments must adopt or amend regulations, ordinances, and/or programs in order to implement the plans following certification by Ecology in accordance with WAC 173-100-120.

CA-5 All jurisdictions shall adopt regulations to protect the quality and quantity of ground water where appropriate:

- a. Jurisdictions that are included in Ground Water Management Plans shall support development, adoption, and implementation of the Plans;
- b. The Seattle-King County Department of Public Health and affected jurisdictions shall develop countywide policies outlining best management practices within aquifer recharge areas to protect public health; and
- c. Aquifer recharge area maps should be prepared by groundwater purveyors as part of the purveyor's wellhead protection program. King County and cities, upon concurrence with the maps, should incorporate them into sensitive areas folios. King County and cities should continually update sensitive areas folios as new information becomes available.

Land use decisions may result in development that causes the depletion or degradation of existing groundwater-based water supplies. The loss or damage to such supplies may be an undesirable but inevitable result of the need to create urban environments in which to work and live. Careful consideration of the impacts of development and appropriate land use decisions can prevent the loss of water supplies for which there is no feasible replacement.

CA-6 Land use decisions should be made using knowledge of potential impacts on aquifers used for water supplies. Sources of information include Ground Water Management Programs, studies by groundwater purveyors, aquifer recharge area maps, and other sources. Land-use decisions should provide for one or more of the following so that demand for water will continue to be met in the future:

- a. Prevent depletion and degradation of aquifers determined to serve as water supplies.
- b. Mitigate impacts on water supplies using techniques such as:
 1. Minimizing the percentage of the ground surface that is covered by impervious surfaces;
 2. Recharging groundwater with stormwater and septic effluent where this may be done without impairment of drinking water quality;
 3. Maintaining the hydrologic balance between infiltration and runoff.
- c. Provide a proven, feasible replacement source of water supply.

CA-7 King County and cities, with the technical assistance of groundwater purveyors, should designate aquifer recharge areas in drainage basins containing aquifers used or needed in the future for water supplies as Environmentally Sensitive Areas under the State Environmental Policy Act. Environmental review of proposed development in these areas should be enhanced by removing appropriate categorical exemptions to SEPA. Guidance should be developed for use by environmental reviewers to ensure that appropriate mitigation is included in permits for development.

C. COMMENTS ON THE FINDINGS OF THE RURAL CHARACTER TASK FORCE

The Urban Ground Water Purveyors Committee supports the adoption of policies RU-8, RU-9, and RU-10 from the report of the Rural Character Task Force. Minor revisions should be made in RU-9 and RU-10 as follows:

"RU-9The tools to achieve this include: seasonal and maximum clearing limits; impervious surface limits; surface water management standards that emphasize preservation of natural drainage systems, and water quality, and groundwater recharge, and best management practices for resource-based activities."

"RU-10 Rural Areas shall be recognized as significant for the recharge and storage of groundwater and as areas necessary for the maintenance of base flows in rivers and streams, the and natural levels of lakes and wetlands and recharge of aquifers. Measures....."

In conclusion, we request that the concerns raised in this letter be addressed by King County in cooperation with local groundwater purveyors. We are ready to work with you to ensure that the citizens' valuable groundwater supplies are protected. Should you have questions or wish to discuss these matters further, please refer to the attached list of representatives of groundwater purveyors who have jointly prepared this letter.

Sincerely,

The Urban King County Groundwater Purveyors
City of Redmond
NE Sammamish Water and Sewer District
Union Hill Water Association

City of Issaquah
 Sammamish Plateau Water and Sewer District
 Water District #83 (Lake Forest Park)
 City of Renton
 City of Seattle
 Highline Water District
 Bryn Mar Water District
 Federal Way Water and Sewer District
 Covington Water District
 King County Water District #111 (Lake Meridian Area)
 City of Kent
 City of Auburn

(attachments: Groundwater Purveyors and map of service areas / well locations)

cc: Gary Locke, King County Executive and Chair of the Growth Management Planning Council
 Growth Management Planning Council
 Metropolitan King County Council
 Charlie Earl, Deputy King County Executive
 Rebecha Cusak, King County Council Staff
 Bill Lasby, Seattle-King County Health Department
 Craig Larson, King County Parks, Planning and Resources Department
 Jim Reid, Manager, King County Planning Division
 Jim Kramer, Manager, King County Surface Water Management Division
 Lloyd Warren, Chairman, King County Water Work Group
 King County Water Work Group Members
 Holly Kean, Executive Director, East King County RWA
 Gary Cline, Executive Director, South King County RWA
 Hedia Adelman, Manager, Water Resources Program, Department of Ecology
 Dave Clark, Director, Division of Drinking Water, Washington Department of Health
 King County Urban Groundwater Purveyors

h:CPPS194CB

URBAN GROUND WATER PURVEYORS KING COUNTY

REV: FEB 25,1994

UTILITY	CONTACT PERSON	FAX NO.	TEL NO.	ADDRESS
CITY OF REDMOND	SCOTT THOMASSON	556-2700	556-2840	15670 NE 85TH ST REDMOND 98052
NE SAMMAMISH WATER & SEWER DIST	HAROLD MATHEWS GEOFF CLAYTON (RH2)	868-4005 869-7769	868-1144 869-1488	3600 SAHALEE WAY REDMOND 98053
UNION HILL WATER ASSOCIATION	JOHN PHILLIPS	868-5661	868-1303 881-8441	P O BOX 712 REDMOND 98073
CITY OF ISSAQUAH	SHELDON LYNNE STEVE CLARK	391-1050	391-1004	P.O. BOX 1307 ISSAQUAH 98027
SAMMAMISH PLATEAU WATER & SEWER DIST	RON LITTLE	391-5389	883-9333	1510-228TH AVE SE ISSAQUAH 98027
CITY OF RENTON	RON OLSEN CAROLYN BOATSMAN LYS HORNSBY	235-2541	277-6207 277-4411 277-5539	200 MILL AVE SOUTH RENTON 98055
FEDERAL WAY WATER & SEWER DIST	ROGER BROWN MARY DUTY	839-9310	941-1516	P.O. BOX 4249 FEDERAL WAY 98063
COVINGTON WATER DIST	JUDY NELSON STEVE GLASS	630-4825	631-0565	18631 - SE 300TH PL KENT 98042
K.C.W.D. #111	GARY CLINE CHARLES WILSON	631-8072	631-3770	27224 - 144TH AVE SE KENT 98042
CITY OF KENT	TIM HEYDON BILL WOLINSKI	859-3664 859-3559	859-3395 859-3078	220 - 4TH AVE S KENT 98032
CITY OF AUBURN	FRANK CURRY CHRIS THORN	931-3053	931-3000	25 WEST MAIN ST AUBURN 98001
CITY OF SEATTLE	NANCY DAVIDSON JUDI GLADSTONE BOB SCHWARTZ	386-9747	684-4608 684-4642 684-5926	SEATTLE WATER DEPT RM 1155 DEX HORTON BLDG 710 - 2ND AVE SEATTLE 98104
HIGHLINE WATER DIST	PEGGY BOSLEY CLIFF BARTLETT	824-0806	824-0375	23828 - 30TH SOUTH KENT 98042
WATER DIST # 83 (LAKE FOREST PARK)	PHILLIP LAY	365-3357	365-3211	4029 NE 178th LK FOREST PK 98155
BRYN MAR	TOM EARWOOD	772-5860	772-1580	8419 S. 116TH SEATTLE 98178
EAST KING COUNTY RWA	HOLLY KEAN	455-8903	455-8366	SU 300,1309-114TH AV SE BELLEVUE 98004
SOUTH KING COUNTY RWA	GARY CLINE	631-8072 (WD #111)	631-2850 (WD #111)	13335 SE 248TH PL KENT 98042



821 Second Ave. MS 151
Seattle WA 98104-1598
(206) 464-5715
FAX (206) 464-1234

Postmarked 2-28-94

February 28, 1994

Mr. Jim Reid
Manager
Planning and Community Development Division
Parks, Planning and Resources Department
707 Smith Tower Building
506 Second Avenue
Seattle, Washington 98104

**Draft Supplemental Environmental Impact
Statement for the Countywide Planning Policies**

Dear Mr. Reid:

Thank you for the opportunity to comment on King County's Countywide Planning Policies DSEIS. The Regional Transit Authority (RTA) looks forward to working with governmental agencies throughout the three-county region to ensure consistency between land use and transit planning activities. RTA staff has reviewed the DSEIS and has the following comments.

No-Rail Option

We assume the No-Rail Option on page 11 and page 40 is the same as the No-Rail Variation on page 90. Discussions of the No-Rail Option/Variation in the document on pages 40 and 90 raise the idea of bus transit with the attributes of rail, leaving some confusion as to whether the No-Rail Option could include exclusive busways, which would make it similar to RTP's Transitway/TSM Alternative or to busway alternatives that were discussed during the Regional Transit System planning process. The document should clarify whether the No-Rail Option is a transitway/busway option or only a TSM option, as described on page 11.

The description of the No-Rail Option improvements does not address the capacity constraint for buses in downtown Seattle. This constraint was identified in the RTP System Plan EIS as a weakness in the ability of all-bus alternatives to serve the centers concept. The discussion of an all-bus system with the attributes of a rapid rail system (i.e., exclusive grade-separated right-of-way) also ignores that an all-bus HCT alternative would require a significant amount of busways to adequately serve other centers. The quantity of roadways, on/off ramps, and other infrastructure requirements would be

Mr. Jim Reid
February 28, 1994
Page 2

significant and would have greater visual impacts and require more right-of-way than comparable rail facilities.

The discussion of bus transit in the DSEIS should reflect these limitations and the effects they would have on the ability of an all-bus system to adequately serve the centers development pattern. On page 90, the analysis states "Bus transit, if developed with the above attributes [of a rail system] could be equally effective in stimulating and supporting concentrated development in centers." Although this conclusion is qualified, if not contradicted, by the final two sentences in the same paragraph, the same assertion is made on page xvii of the Executive Summary, this time without any qualification. This conclusion needs additional discussion and support, particularly since the opposite conclusion was reached in the RTP System Plan EIS.

Page 9, Fourth Paragraph

TR-22 The Regional Transit System Plan is a three-county plan; it does not include Kitsap County.

Page 76

TR-23 The *Regional Transit System Plan* heading should be moved over to the first column, preceding the paragraph that begins "The Regional Transit System Plan released in October 1992..." The date October 1992 apparently refers to the draft plan; the final plan was released in June 1993. The entire discussion of the RTP should then be moved to the end of the Land Use/Transit Linkage section, as it currently falls in the midst of a discussion of existing transit service.

TR-24 Second column, subheading Regional Rail. This description should mention the east and south corridors (Bellevue, Tukwila, Renton, etc.). As written, it gives the impression regional rail would be limited to the city of Seattle.

TR-25 Second column, subheading Bus. The subheading should be changed to "Regional Bus."

TR-26 Second column, subheading Local Bus. The description should delete the word "Seattle." These services would be available in other parts of the urban area, not just Seattle.

TR-27 Second column, subheading Arterial Improvements. Roadway improvements, as well as traffic controls, would be used to give HOVs priority.

Page 81, Second Column

TR-28 The discussion of telecommuting leaves the reader with the impression that 39 percent of workers could easily become daily telecommuters. The discussion should note that telecommuters generally work at home one or two days a week and commute to their workplace on other days. The discussion also does not report another conclusion to be found in Schneider's study, which is that telecommuting could account for 5 to 9 percent of vehicle miles traveled by 2020, and that vehicle miles traveled will increase significantly even if telecommuting reaches this potential level.

Russell Loring
King County Councilmember

Bill Brubaker
Shoreline City Councilmember

Bill Johnson
Burien City Councilmember

Sharon Boekelman
Burien City Councilmember

Martina Choe
Seattle City Councilmember

Don Paulson
Shoreline City Councilmember

Dave Erling
Edmonds City Councilmember

Mary Lawler
Federal Way City Councilmember

Ed Hansen
Everett Mayor

Kim Madison
Shoreline City Councilmember

Paul Miller
Burien City Councilmember

Sid Morrison
Washington State Department
of Transportation Services

Greg Nickels
King County Councilmember

Norma Rice
Seattle Mayor

Cynthia Sullivan
King County Councilmember

Jim White
Everett Mayor

To be appointed
King County Councilmember

To be appointed
King County Councilmember

TR-20

TR-21

Mr. Jim Reid
February 28, 1994
Page 3

The discussion of potential telecommuting could also be enhanced by citing evidence from studies on actual telecommuting in this region. For example, the Washington State Energy Office conducted a telecommuting demonstration project in the Puget Sound Region starting in 1990. In the demonstration project, telecommuters reduced their total commute trips by an average of 34 trips *per year*, or an average of less than one trip per week. One-third of the telecommuters dropped out of the demonstration before it had ended. About half of the telecommuters had to cut back on their telecommuting frequency or had to stop telecommuting for more than a week during the demonstration. While this does not mean that telecommuting cannot become an important element in the mix of options available to reduce commute trips, it indicates a need for caution in predicting the future potential for telecommuting.

Page 83, Table 7; page 88, Table 9

TR-29 It would be useful to represent a Concentration, No HCT option in this comparison, which would represent the thrust of the No Rail Variation analyzed throughout the EIS.

Pages 90-91

TR-30 The discussion of potential ridership should indicate that the RTP model used to generate these figures did not assume any ridership benefits from commute trip reduction programs. If ridership benefits from concentration in centers and from commute trip reduction programs are factored in, the rail alternative's ridership would increase by 18 percent, while TSM ridership would increase by 11 percent. Rail/TSM Alternative ridership would then be about 25 percent higher than TSM Alternative ridership, and more than double 1990 ridership. It should also be noted that the concentration assumed in the RTP model was not as great as that assumed in the 8 or 14 Centers Alternatives. Presumably the difference between Rail/TSM and TSM ridership would be even greater under these land use assumptions.

Thanks for the opportunity to comment.

Sincerely,


Charles A. Kirchner
Environmental Planning Supervisor

CAK:MW:vs

King County
Department of Development
and Environmental Services
2600 - 125th Place Southeast
Bellevue, Washington 98006-1400

February 22, 1994

TO: Jim Reid, Manager
Planning and Community Development Division

FM: Chuck Kleeberg, Director 

RE Countywide Planning Policies Draft SEIS

Thank you for the opportunity to comment on the subject draft supplemental environmental impact statement (SEIS). The SEIS does a good job of taking a broad yet comprehensive view of the proposed countywide planning policies and their anticipated affect upon the region. There are, however, issues of specific interest to DDES which I believe should be expanded upon.

- NS-13
1. Issues surrounding the designation of mineral resource lands are not discussed. Although the SEIS makes mention of mineral resource lands as a component of Resources Lands in general, there is no specific analysis of mineral lands, as there is with agricultural and forestry lands.
 - NS-14 2. Discussion of mineral lands should include analysis of future requirements per the Growth Management Act requirement for a twenty year supply of mineral lands. The discussion should also include how mineral lands will be treated under the County's conversion to the new zoning code, and the extent to which that fulfills the GMA mandate (Chapter 36.70A RCW).
 - NS-12 3. Resource lands are dealt with as a subset of Rural lands. The countywide planning policies, and the 1985 Comprehensive Plan recognize Resource lands as unique and separate from Rural lands. The implication of the SEIS analysis is that Resource lands must locate within the designated Rural area. It should be made explicit that Resource lands comprise a designation of their own, independent of Rural lands.

Thank you again for the opportunity to review the draft SEIS. Please call me at 6-6700 if you have any questions.

CK:gt

cc: Lisa Majdiak, Growth Management Project Supervisor
Greg Kipp, Acting Deputy Director, Department of
Development and Environmental Services
ATTN: Jerry Balcom, Supervisor, Code Development
Section



RECEIVED

MAR 1 1994

February 28, 1994

Lisa Majdiak
Planning & Community Development Division
Parks, Planning & Resources Department
707 Smith Tower
506 Second Avenue
Seattle, WA 98104

RE: Supplemental Environmental Impact Statement

Dear Ms. Majdiak,

HO-1
LA-1
The above Supplemental Environmental Impact Statement (SEIS) of the Countywide Planning Policies (CWPP) does not adequately research, discuss, nor determine the impact of these policies upon the delivery of Affordable Housing and Net Buildable Land in Metro-King County and its cities and towns. The basic ingredient that is missing is the market demand input that will indicate the impact upon the home buyer's willingness to purchase the housing projected in the various alternatives. Missing also is the research necessary to determine the linkage between Affordable Housing and Net Buildable Land and the employment sector of our economy.

EC-8
The employment sector is the highest priority sector of our economy. If the CWPPs do not stimulate and support the employment sector, then the priorities that follow such as housing, infrastructure, services, recreation, resource lands, sensitive areas, environmental issues, etc. will be of little significance, because the economy will go into a decline.

HO-7
The employment sector is the first priority, and second is housing, followed by all the other priorities. The reason being is without jobs there is nothing to talk about, and if we do have the jobs, then we must meet the buyer's expected housing demand. If we do not meet this buyer demand, the buyer will move to some other location, and the employers and businesses will not have any qualified employees to hire.

The other linkage that exists between jobs and housing is that as the cost of housing goes up, either the employee must pay more or settle for less housing. The employers could pay more to offset the increased housing cost, but that makes the employer non-competitive with the regional and world markets.

Lisa Majdiak
Planning & Community Development Division
Parks, Planning & Resources Department
February 28, 1994
Page 2

LA-4(a)
LA-9
HO-3
HO-7

EC-13

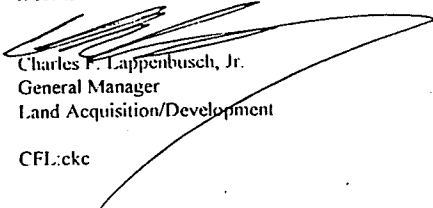
This SEIS does not address, nor explore, the issues of what the demographics of the 325,000 +/- people that will be coming into our area want for housing. It tells them what they can have, and if the buyers don't want that type of housing, then those buyers simply won't locate here. The linkage of the cost of housing upon the non-competitiveness of our employers is also not discussed.

We must address these issues, among others, to determine how we are going to manage growth to deliver the jobs and housing the market demands. To date, we are managing growth by telling the market what it is they can have, and not how we are going to deliver what it is the market demands.

The SEIS must be further improved to deal with these issues.

Sincerely yours,

LOZIER HOMES CORPORATION


Charles F. Lappenbusch, Jr.
General Manager
Land Acquisition/Development

CFL:cke



King County
Department of Public Works

Yester Building
400 Yester Way, Room 700
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RECEIVED

FEB 24 1994

DD

February 25, 1994

To: Lisa Majdiak, Growth Management Project Supervisor, Planning and
Community Development Division

Fm: *Nancy Laswell*
Nancy Laswell, Regional Affairs Coordinator

Re: Draft Supplemental Environmental Impact Statement (SEIS) for the Countywide
Planning Policies (CPPs)

Thank you for the opportunity to comment on the Draft SEIS for the CPPs. The Department of Public Works has reviewed the draft document and offer the following comments for consideration in the Final SEIS.

I. Land Use

- LA-11(a)
- A. The Land Use Chapter focuses on whether the growth targeted in each alternative can be accommodated by vacant and redevelopable land under current zoning. However, as jurisdictions develop comprehensive plans which meet the requirements of Growth Management and implement the Countywide Planning Policies, zoning will change. The primary land use analysis therefore is based, in part, on data we know will change. It would be more helpful to focus on the amount of change needed to accommodate the growth targeted in each alternative.

The primary distinction drawn between the alternatives is how much vacant land is consumed. Little information is provided beyond general observations to support these distinctions. Additionally, the Draft SEIS states that the Pre-CPP alternative would consume virtually all remaining vacant urban lands. However, under this alternative jurisdictions would still have to develop comprehensive plans that meet Growth Management requirements. Based on this, cities would be the preferred provider of urban services and concurrency requirements would still need to be met. We believe the amount of growth targeted for unincorporated King County would be similar to that in the proposed jurisdiction

LA-5

level growth targets. The differences between the alternatives for vacant land consumed may not be as great as stated in the Draft SEIS.

II. Transportation

- TK-2
- A. The document is too general to allow for specific comments or even speculation on possible project impacts. The location of increases of road vehicle use will vary by alternative but the discussion of impacts is both qualitative and sketchy. Little information is provided beyond general observations such as stating that the 14 and 8 Centers alternatives will provide for more transit use and lower region wide total vehicle miles.

III. Stormwater Management

- IS-25
- A. The Water Quality Ordinance noted on page 132 has now been codified. The correct citation is King County Code (KCC) Chapter 8.12. Several other plans have also been codified: the Flood Hazard Reduction Plan (KCC Chapter 20.12), East Lake Sammamish Basin and Nonpoint Action Plan (KCC Chapter 20.14), and Hylebos Creek and Lower Puget Sound Basin Plan (KCC Chapter 20.14).
- B. The link noted on page 138 between proposed Fiscal Analysis and Economic Development (Fis/Ed) Task Force Policy ED-4 and the effectiveness of the environmental protection provided by stormwater management is not clear. It appears that the primary impact of the proposed policy would be to re-evaluate funding and responsibility for the provision of stormwater management facilities and services. Improving the environmental effectiveness of the facilities and services does not appear to be an outcome of implementation of the proposed policy. The environmental protection afforded by stormwater management facilities and services and the designation of a service provider and source of funding for those facilities and services are two distinct concepts and should be recognized as such in the policy analysis.

IV. Water Quality

- IS-26
- A. Several of the ongoing SWM Division activities mentioned on page 175 in relation to ground water quality improvement are also applicable to surface water quality improvement and can be classified as being part of the SWM Division's National Pollutant Discharge Elimination System (NPDES) permit application and compliance activities. The activities mentioned that would be included under the umbrella program of NPDES permit application and compliance are the illicit connection program, Water Quality Ordinance, Stormwater Best Management Practices (BMP) Manual, and the Hazardous Waste Management Program.
- IS-6
- B. Missing in the analysis of ground water resources is any discussion of ground water quantity. This discussion is also missing in Chapter 8.0, Water Supply. The CPPs alternatives will have a very important impact on ground water

IS-6

recharge areas in the County. Although a detailed analysis may not be possible, some discussion of this issue should occur. Ignoring the potential impacts of the different growth scenarios on ground water recharge is a serious omission because of the importance of ground water for potable water supply and maintenance of surface water base flows.

- C. Reference is made on Page 176 to CPPs CO-12, CO-15, and CO-16 and the possibility that they might "inadvertently induce growth" of community and individual septic systems. The CPPs mentioned do not induce growth, they define a level of service. Because the cost of providing sewage treatment services to all of King County is prohibitive, the policies state that the appropriate level of sewage treatment services in rural areas is community and individual septic systems. These systems, if well designed, appropriately located, and maintained, do not pose a significant threat to ground or surface water systems. The analysis should be deleted or changed to reflect the comments given above.

HO-13

- D. The analysis on Page 178 of affordable housing policies states that the policies could have a positive effect on water quality. On page 138, however, the analysis of affordable housing policies states that the policies could have a negative effect on stormwater management. Because stormwater management and water quality are linked, there should not be a discrepancy in the policy analysis. The effects of affordable housing, or any housing, on stormwater management and water quality are dependent on the location of the housing. If housing is targeted for infill development, then it is likely that the facilities necessary for stormwater management and water quality are available or can be made available at a reasonable cost. If the housing is targeted for a relatively undeveloped area, however, then the costs of stormwater management and water quality may be higher. The impact of stormwater management and water quality costs on affordable housing is solely dependent on the location of the affordable housing relative to sensitive environmental areas and necessary facilities and services. Housing built near sensitive environmental areas (e.g., wetlands) will cost more than housing that isn't near those areas because of the costs of mitigation, including those costs associated with stormwater management and water quality.

V. Plants, Animals, and Fish

NS-26

- A. The discussion on page 181 and the subsequent policy analysis should reflect the fact that density alone is not necessarily a good determinant for assessing impacts to vegetation, fish, and wildlife. If density is designed around critical habitat corridors instead of over them, as alluded to in the discussion, then its

impacts can be greatly diminished. While it is true that density in one area may result in less impacts in other areas, it is also true that some critical habitat exists in areas that are already densely populated (e.g., Lake Washington, Lake Sammamish, Lower Green River). Site design can be just as important, if not more so, than density.

VI. Solid Waste

IS-27

- A. There are several factual errors and out-of-date information in Chapter 11. The document states that the Hobart Landfill is to be closed and replaced with a transfer station; and the Cedar Falls Landfill is to be closed and replaced with a drop-box facility. As stated in the Final 1992 Comprehensive Solid Waste Management Plan, the Hobart Landfill will be closed but will not be replaced by a new facility. Service will be provided by existing facilities. The Cedar Falls Landfill has been closed since 1989. Its replacement drop-box facility has also been in operation since its closure. The document also makes reference to the new Enumclaw Transfer Station as a planned improvement. However, the station has been open and operational since April 1993.

IS-28

- B. The remaining comments are related to the description of significant impacts to solid waste collection services. The basic approach used in this section assumes that additional growth or changes in development patterns will require some corresponding growth or realignment to the solid waste collection, transfer and disposal systems. While this approach is accurate for utility services, such as water and sewer, it is not accurate for solid waste management. The basic reasons for this are: 1) the Transfer and Disposal System are already designed to meet future needs; and, 2) the design and location of these facilities are relatively insensitive to development patterns or changes in density.

IS-29

- C. No provisions for additional landfill space in the County should be included in the description of impacts. As discussed in the 1992 Plan, it is commonly understood that the Cedar Hills Landfill is the last landfill that will be able to be sited in the County. The role of the collection system in solid waste management is also not clearly discussed.

VII. General Comments

IN-2

- A. The level of analytical detail provided by the SEIS is not sufficient to allow comprehensive planning decisions to be made. This lack of analytical detail exists both within the subjects discussed in individual chapters and, especially, among the various subjects discussed in all chapters.

IN-1(a)

- B. There are a series of areas where the document indicates the current status of the planning effort and suggests there is more to be done to either supplement or

Page 5
Lisa Majdiak
February 25, 1994

actually fill a hole in the current countywide planning policies. It would be helpful for the final SEIS to have a graphic or table to lay out which "policies" are complete for the countywide planning level and which areas have forthcoming efforts. The latter could include what vehicle will be used to pass on the environmental review, whether it's a separate EIS, another SEIS, etc.

- NS-27
- C. Metro has been a part of King County since January 1, 1994. Metro is now the King County Department of Metropolitan Services. Metro water quality activities should be listed as being part of King County's activities.
- D. The location of supporting materials in the appendices should be clarified in the table of contents. The multitude of documents currently appearing there is very confusing. If documents were separated by colored paper or index tabs, they would be much more useful.
- E. Reference is made on Page 185 to a table that lists Rural Character Task Force policies that could have an adverse impact on vegetation, wildlife, and fish. The table is missing.
- IS-30
- F. A key or some text is necessary in order to explain the information contained in the table in Appendix D.
- G. Appendix H refers to the service fee assessed by King County only and does not necessarily reflect surface water management charges assessed by other jurisdictions. The title of the table should be modified to reflect this.
- VS-7
- H. Reference is made to ESHB 2929 on page 155. The Growth Management Act (GMA) has been codified primarily as Revised Code of Washington (RCW) Chapter 36.70A. The GMA should be cited as part of the RCW.

Again, thank you for the opportunity comment on the Draft SEIS. If you have any questions, please do not hesitate to contact me at 296-3775.

cc: Bruce Bennett, Program Analyst, Surface Water Management Division
Mark Buscher, Comprehensive Planning Unit Supervisor, Solid Waste Division
Sue Blazak, Special Projects Intern, Roads Division

Your City, Seattle

PLANNING DEPARTMENT

J. Gary Lawrence, Director
Norman B. Rice, Mayor



February 28, 1994.

Jim Reid, Manager,
Planning and Community Development Division
Parks, Planning and Resources Department
707 Smith Tower Building
506 Second Avenue
Seattle, WA 98104

Dear Mr. Reid:

We are pleased to submit our comments on the Supplemental Environmental Impact Statement for amendments to the Countywide Planning Policies. We appreciate the effort necessary for discussing probable impacts of such a broad level of actions.

GENERAL

We recommend that the final document be more accessible to the reader by moving certain information to appendices and eliminating unnecessary repetitions. For instance, the description of the methodology for how the County calculated development capacity could be in an appendix. The results, not the methods should be included in the document, since they are the most critical information for both the public and the decision makers.

NS-18
NS-27

The treatment of the Mitigating Measures section of several chapters in this SEIS, including Air Quality, Plants and Animals and Noise is unusual and inappropriate. Rather than summarizing the impacts of the alternatives, the Mitigating Measures sections should be used to suggest measures that could be added to one or more of the alternatives in order to reduce the expected adverse impacts.

ALTERNATIVES

Description

The Description of the Alternatives provides uneven information about the alternatives, making it very difficult to understand or draw conclusions about the impacts of the various options. The way the Policy Options and the Magnet Alternative are presented does not allow the reader to make direct and consistent comparisons or reach clear conclusions about the alternatives.

IN-6

The policy options are not described at all in the Description of the Alternatives, yet in each element of the environment conclusions are drawn about the likely impacts of using these policies to supplement or supplant the adopted CPP. While, with some effort, one can find pieces in the Appendix that may be intended to represent those

IN-1(a) policy options, they are not clearly labeled as the source of assumptions for the impact analysis. The FSEIS should describe all the potential actions it is analyzing in the Description of the Alternatives section. Also, the FSEIS should provide a more selected or more carefully ordered set of material in the Appendix.

IN-6 The Magnet Alternative is presented in such a general way that it is not clear whether it can truly stand as an alternative to the No Action or Centers alternatives. In some ways, with its proposed least-cost planning technique and benchmarks, it is actually suggesting how and how much to implement the Countywide policies. In that sense, it may actually be part of the next phase of countywide planning and not totally appropriate for this level of analysis. One way to provide a better description of what this alternative is aiming at might be to provide a chart that summarizes its proposed benchmarks. Maybe it should not be characterized as an alternative, but as a process for identifying more specific mitigation's that could be applied to any of the other alternatives at some time in the future.

IN-6 Throughout the document, the impacts of the Magnet Alternative are poorly analyzed. In many cases, the SEIS seems to substitute recitation of this alternative's benchmarks for analysis. Perhaps because this alternative is so different from the others, being more process-based and less clear about its intended development pattern, it is more difficult to analyze.

A fuller definition of this alternative might facilitate more complete analysis. One of the key elements of this alternative seems to be its reliance on a series of benchmarks. The benchmarks are only objectives. Because the benchmarks are mostly laudable objectives, representing values many people may subscribe to, the objectives in themselves may not cause adverse impacts. However, achieving those objectives will require actions that could have impacts. A substantive analysis of the alternative must begin by asking how the benchmarks could be achieved. To the extent, the alternative is not explicit about the tools that would be used, some assumptions may be necessary.

IN-6 For instance, one set of benchmarks calls for certain percentages of future urban growth to be accommodated through infill, renovation and redevelopment of existing developed lands. How can a local government ensure that a given amount of its new development will occur on already occupied land? Does this imply a need to substantially upzone some developed land in order to provide an incentive for redevelopment? By what criteria would areas be chosen for redevelopment? At the same time, is there a need for downzoning or temporary development controls to direct growth away from building on undeveloped land? What impact would these actions have on the countywide development capacity?

The FSEIS should apply more critical analysis to this alternative.

AFFORDABLE HOUSING

Generally, we agree with the analysis presented in the Affordable Housing section. We agree that quantifying the impacts on housing affordability of the SEIS alternatives is very difficult because there are too many factors affecting housing costs and household income. We concur with the observation that, while land costs in centers are likely to be higher than elsewhere, because of the higher densities permitted in centers, the land cost per unit and overall housing development cost are likely to be lower in centers than outside centers.

LA-9 One area that is not addressed in the SEIS is the question of whether enough housing consumers will accept living at higher densities to make the Centers alternatives feasible. The recently completed City of Seattle/Puget Sound Regional Council Residential Preference Study indicates that, if centers include amenities that housing consumers want, centers can attract a large enough share of the King County housing market to make the centers alternatives feasible. These amenities include neighborhood parks, trees and greenery, good public transit, good access to neighborhood business, and high quality urban design. The executive summary of the Residential Preference Study is attached. It should be reviewed with an eye toward tempering the language about personal preferences found on page 35 of the SEIS.

ECONOMIC DEVELOPMENT

IN-6(a) In repeated comments on the scope of this SEIS, City staff stated concerns about treating Economic Development as an element of the environment. This chapter is inappropriate in an EIS. The State Environmental Policy Act (SEPA) and the SEPA Rules state that the purpose of an EIS is to describe the impacts of government action on the biosphere, ecological systems, natural resources and the built environment. The list of elements of the environment is extensive, but it does not include any topic resembling "economic development." The SEPA Rules cite a short list of topics that are explicitly not required in an EIS: "methods of financing proposal, economic competition, profits and personal income and wages, and social policy analysis." The Economic Development chapter includes discussion of assumed impacts about four of those six topics.

IN-4(a) Moreover, SEPA is clear that an EIS is not to be the sole consideration for decision makers, but that it is to present environmental impacts. SEPA anticipates that decision makers will weigh environmental information against those other considerations in selecting a course of action. If information is developed about economic impacts, there are many other forms for presenting such information to the public and decision makers, without adding more pages to an already lengthy document.

IN-5(a) Unlike air quality, noise, transportation, or even land use policy, economic development is not a definable medium. Does economic development mean growth in the number of jobs, in average wage levels, in net return to real estate investors, in overall economic activity, in regional export, in tax revenue; or does it refer to decreases in the number of households living in poverty, to an increase in housing affordability, or to the eponymous programs of governments' intended to stimulate jobs and tax base? From the way it is described in this SEIS, it would be difficult for any two people to gain a mutual understanding of what environment is being affected by the alternatives. Regardless, none of these topics should be part of the SEIS.

If considerations of the intent of SEPA and the inherently nebulous nature of the topic are not persuasive, then the discussion in this chapter of the SEIS should be improved considerably. It uses unfounded assumptions, makes illogical conclusions and cites supposed impacts that are not significant or necessarily adverse and treats the alternatives unevenly. It also confuses the activity of economic development with economic development as an aspect of the environment.

For instance, the discussion of impacts from the No Action Alternative on page 204 says that "The environmental impacts resulting from this alternative will depend on the economic development concerns and employment targets that local jurisdictions place in their comprehensive plans. At the present time, insufficient information exists to assess the environmental impacts that may result from this process." Yet in the next

EC-13 paragraph, the SEIS alleges that this alternative will engender competition among jurisdictions for increasing jobs, and that "(t)his type of competition could have significant adverse impacts on the County's physical and biological environment, since one primary technique used by jurisdictions to attract companies is to make choice land available for siting industrial and commercial buildings."

Somewhere between these two paragraphs, the authors found sufficient information to draw conclusions about environmental impacts. It is also interesting to note that the impacts alleged here are not impacts to Economic Development, the topic of this chapter, but to "the County's physical and biological environment." If those impacts can be demonstrated, they should be cited in the appropriate chapters of the SEIS that deal with the affected elements of the environment.

More important, however, is the line of reasoning used here: that in a future governed by this alternative there will be competition for jobs among jurisdictions that is more intense than occurs now; that jurisdictions will find it necessary to "make choice land available" in order to give them an advantage over jurisdictions; and that development of this "choice land" will inherently produce significant adverse impacts to the biological environment. This intellectual leap is insupportable.

This chapter's discussion of the Eight Centers Alternative presents economic aspects as the affected environment, and so follows the format used through most of the SEIS. However, its speculations about impacts are no more convincing than those cited for the No Action Alternative.

EC-3 In describing potential impacts within manufacturing centers, the SEIS apparently assumes a continuing growth in industrial and manufacturing employment to suggest that land intensive employers will be priced out of these areas. This, according to the SEIS, will lead to fewer entry-level industrial jobs. The basic assumption being made here is contrary to the widely accepted projections that industrial and manufacturing jobs will decline over the next 20 years, not only as a proportion of total jobs, but in absolute numbers. But even if land-intensive industrial jobs were to increase demand for land in the manufacturing centers, there is no analysis presented here to indicate that the centers would be unable to accommodate both the existing and future industries. And there is no information presented that leads to the conclusion about the types of jobs that will become available or lost.

EC-9 The discussion identifies "viable middle income single family residential neighborhoods" as areas where relative property values will decline. It cites as an impact the inability of the market to redevelop these areas to more dense uses because zoning will direct growth only to centers. On the first point, it seems equally likely that related land values in these areas will increase if the demand for home ownership of detached units continues to increase, but the supply is somewhat constrained by the adopted UGA.

EC-9 Whether these areas could be redeveloped is largely a function of what their zoning allows. Redevelopment generally occurs only in areas where the zoning allows higher densities than are found on the ground. It is unlikely that most areas described as "viable middle income single family areas" have current zoning that would allow substantially higher density than exists now. To allow redevelopment to higher densities in these locations would require a change from the current zoning. Since none of the alternatives proposes upzoning areas fitting this characterization, the contention that this alternative is somehow unique because it would prevent redevelopment is misleading.

EC-7

Does the last sentence in the discussion of the Eight Centers Alternative (page 205) intend to imply that a reduction in the number of people who professionally engage in automobile sales would be a significant adverse impact?

DETAILED COMMENTS

LA-37

page xii (and elsewhere). South Lake Union is no longer part of a proposed urban center; that urban center should be referred to simply as Seattle Center.

page xiii. Paragraph 2 under the heading Summary of Environmental Impacts says that overall the policy recommendations of the Fis/Ed, Rural and Housing Affordability task forces will provide for greater beneficial impacts on the environment. Even in the summary, it would be useful to distinguish among these separate proposals and to provide enough information about them for the reader to understand how the recommendations relate to particular impacts.

page 2. Under the heading "Proposed Action and Process for Amendments," it says that the proposed action is adoption of policies by the King County Council. Are there no other jurisdictions that must concur in the adoption for the policies to become effective?

pages 7 and 8. These charts are a good way to show general distribution of growth. Unfortunately the legend does not reproduce well, and it is not possible to get information from them.

LA-4

page 17. The last sentence in the last full paragraph says that too large of a cushion (surplus) in development capacity would encourage lower density, sprawling development patterns. This is not necessarily true; the ultimate development pattern would depend on the geographic location of that cushion. For instance, if most of the cushion were in urban centers, sprawl would not be the result.

page 36. It seems contradictory to say that the development of urban centers under the Eight Centers Alternative would produce more adverse impacts on the character of urban centers than the No Action Alternative. If these areas are urban centers, or are intended to be, new development with urban activities at an urban scale should be seen as enhancing their character. Individual development projects may displace some existing use or structure or may produce some localized conflicts in use, but at the countywide level of this SEIS the impacts of urban development in urban centers is a positive impact.

LA-37

The current employment density in the Seattle CBD is 155 jobs per acre, not 123, as reported on page 36.

LA-37

page 50. The mitigating measures discussion says that the Pre-Countywide Planning Alternative will have the least need for mitigating the impacts of higher densities. However, this is the alternative that is most likely to produce new impacts on undeveloped or rural land. The imposition of suburban development into these areas is a greater impact on existing character than adding midrise apartment buildings in an urban center.

LA-37

page 53. In citing the existing mechanisms that help mitigate impacts on the shoreline environment, the discussion should include reference to the Shoreline Master Programs of other jurisdictions, as well as that of King County.

LA-38 page 54. Among the unavoidable impacts of urban growth areas and urban centers, the discussion says "Vacant land or open spaces may be developed." The term "open space" has a particular meaning that usually implies permanence, either because of public control or private dedication that purpose. While it is clear that development would occur on vacant land that is not now protected by public ownership or dedication, it seems misleading to suggest that "open spaces" would be developed.

page 102ff. The chapter dealing with Human Services is too broad. It is obviously not possible to be very specific about this issue at this time, but it seems that, under any alternative, impacts to particular needs and to delivery systems will vary considerably, depending on the service. Such variability does not surface in the discussions in this chapter.

IS-1 Part of the problem is that the chapter does not delineate the nature of the impacts. Since all of the alternatives assume the same amount of growth in population and households, is there a suggestion that certain development patterns would engender higher need for human services? Which services are most likely to feel the impact? Would concentration of growth facilitate access to the services?

page 104. The two sentences in the first paragraph under the 14 Centers Alternative seem to directly contradict one another.

IS-31 It is not clear how the affordable housing goal and transportation policy in the Magnet Alternative relate to impacts on human services.

page 130. It is worth noting in the mitigating measures section of the Water Supply chapter that dwelling units in multifamily buildings use substantially less water than detached single-family units. Therefore, the more growth is concentrated into urban settings in multifamily buildings, the less the region will need to rely on the development of new water sources.

page 142. The references to the Regional Transit System Plan under both the Eight and 14 Centers Alternatives are superfluous.

NS-18 page 168ff. The discussion of air quality impacts should continue to emphasize the relative significance of likely impacts among the alternatives. As mentioned on page 167, motor vehicles generate roughly 80% of particulate emissions, 70-75% of carbon monoxide and 60% of nitrogen oxide. Therefore, to the extent alternatives reduce the amount of motor vehicle travel, they can make substantial improvements to overall air quality.

Other pollutants and other sources are also important. However, the chief distinguishing characteristic of the alternatives as they relate to air quality is not the amount of total development or the number of other types of sources they will produce, but the amount of traffic they will generate.

NS-15 page 169. The last sentence under the first paragraph in the discussion of Eight Centers Alternative draws a conclusion that is hard to sustain: "...increased land use density may cause fixed sources (such as lumber mills) to locate close to conflicting uses (such as residences)." Quite the opposite -- with a higher percentage of new residences located in a relative few centers, there will be less chance that lumber mills would locate near residences, not only because the statistical probabilities decrease, but also because it is very likely that in developing land use controls that direct growth

to centers, jurisdictions would endeavor to protect those areas from noxious uses. Even outside urban centers, it does not seem very likely that potential operators would try to develop such uses near residences, or that existing or future land use controls would allow them to.

NS-25

page 178. This page exhibits one of several instances in the document where beneficial environmental impacts are ascribed to the Economic Development Policies without detailing how those policies provide for more protection than is incorporated in the CPP.

page 185. The following clause should be appended to the sentence under Economic Development Policies: "...although land-intensive business parks promoted in this policy option may lead to more adverse impacts." Similar language should be considered for analysis related to this policy option elsewhere in the SEIS.

Thank you for the opportunity to comment on the document. Please feel free to call me or Elsie G. Crossman to discuss our comments.

Sincerely,

J. Gary Lawrence
Director, Planning Department

Attachment.

cc: Mayor Norman B. Rice
Seattle City Council
Betsy Reveal, Director, Finance Department
Mary Jean Ryan, Director, Office of Economic Development
Tom Tierney, Director, Office of Intergovernmental Relations
Gary Zarker, Director Seattle Engineering Department
Pat Schneider, Law Department
Bob Morgan, Council Staff
Jeff Bender, Planning Department
Tom Hauger, Planning Department
Steve Pearce, Planning Department

Planning Department City of Seattle

J. Gary Lawrence, Director
Norman B. Rice, Mayor



Residential Preference Study

Executive Summary

February 15, 1994

Abstract

Metropolitan growth management, with its regional environmental and fiscal benefits, depends on realizing the potential of cities as highly attractive environments in which to live and work. This study explores the conditions under which people would choose to live in a dense city neighborhood instead of a suburb. The findings suggest that modern municipal and state approaches to growth management, which focus on coordinating land use regulation and transportation planning, improving public facilities and transit, and increasing access to urban amenities, will increase the attractiveness of cities. Improving the quality of life in cities in ways not encompassed in most current growth management planning, such as increasing home ownership, reducing crime, increasing school quality, and increasing the sense of community, would also contribute to regional growth management.

Introduction

A key organizing concept in Seattle's comprehensive plan is the urban village. Urban villages are conceived as largely self-contained residential and commercial neighborhoods dispersed throughout the central city of a metropolitan area. Each urban village would have a unique identity in the larger urban environment. Residential densities in urban villages would be high enough to support efficient transit service, encourage walking, and provide adequate markets for neighborhood stores. Existing and new urban villages would accommodate most or all the population growth planned for Seattle for the next 20 years.

Questions have arisen about the viability of urban villages. How can we attract people to live in urban villages? In particular, how can we compensate for the disadvantages often associated with high density living? How many people will be attracted to urban villages? Who will they be? To answer these questions, the Seattle Planning Department, the Puget Sound Regional Council, and a consultant team led by Decision Data conducted a study of the residential preferences of people in the Seattle metropolitan area.

Major findings

1. Housing of intermediate density is generally of intermediate value to people. On a scale of housing type preference, townhouses and buildings with 2 to 5 units occupy an intermediate position between a detached single family house and a building with 6 or more units.
2. Different people want different things in a home. For slightly more than 1/3 of the population, housing type is more important than any other dimension of a house or a neighborhood. For slightly less than 1/3, home ownership is more important than anything else, including housing type. For the remaining 1/3, several things are more important than housing type, including ease of housing affordability, commuting time, school quality, and crime. For this last group, the combination of urban village amenities consisting of good design, transit quality, neighborhood businesses, urban culture, trees and greenery, and neighborhood parks also greatly outweighs housing type.
3. Neighborhood parks, trees and greenery, good public transit, good access to neighborhood businesses, and urban design that gives a sense of openness have a significant impact on the desirability of dense city neighborhoods. The percentage of the metropolitan area population who would prefer city multifamily homes when these features are present is about double the percentage who would prefer these homes when these features are absent. This occurs even if schools and crime are worse in the city than in the suburbs.
4. Townhouses in urban villages would be attractive to many people who would not otherwise choose a home in a dense city neighborhood.
5. If city schools and city crime were perceived to be no worse than suburban schools and suburban crime, and if urban villages became places with a strong sense of community, the urban village market share would increase dramatically. Under these conditions, more than 1/3 of the metropolitan area population would prefer an urban village apartment, condominium, or townhouse to multifamily housing outside the city or to a single family house anywhere.
6. What people want in a residence depends in part on how old they are, whether they have children, and how much money they have. The young and the elderly are more likely than the middle-aged to prefer an apartment or condominium in an urban village. Households with children are much less likely than households without children to choose to live in an urban village, unless city schools are equal to suburban schools and townhouses are available. Households with incomes below the median are much more likely than households with incomes above the median to prefer an apartment or condominium in an urban village. Urban village townhouses would attract approximately the same share of each income group.
7. Urban villages will appeal most to people who already live in the central city. Seattle residents are much more likely than residents of the rest of the metropolitan area to prefer

an urban village home, whether it is an apartment, a condominium, or a townhouse. Depending on school quality, the level of crime, and the affordability of single family houses in the city, between one-third and one-half of Seattle residents would choose the urban village over other residential alternatives.

Implications

1. Growth management can work, and current urban planning practice can help it work. Although none of the physical improvements, land use regulations, or design standards proposed in the *Seattle Mayor's Recommended Comprehensive Plan* would alone hugely affect the desirability of dense city neighborhoods, in combination they will substantially increase the number of people who prefer such neighborhoods to the suburbs. Although many people are not responsive to these features of a home and a neighborhood, enough are responsive to these features to satisfy the demands of growth management in this metropolitan area over the next generation.
2. Home ownership should be a major goal of urban planning, and creating home ownership opportunities in central cities should be a major goal of metropolitan growth management. For many people, home ownership is more important than housing type and more important than any combination of other features of a house and a neighborhood. Increasing home ownership opportunities in dense city neighborhoods would substantially increase the attractiveness of these neighborhoods, and thereby would directly contribute to growth management.
3. Townhouses and other medium density housing types are important to growth management. Many people who would not consider living in a large apartment or condominium building would consider a townhouse or small multifamily building if the other features of the house and the neighborhood were right. Townhouses in particular are significantly more attractive than higher density buildings to higher income households, middle-aged persons, and households with children, all of which are important constituencies for local government. Townhouses and other medium density housing types meet the threshold of residential density required for efficient transit service, which is key to growth management.
4. Growth management is the nexus of urban policy and environmentalism. Protecting the regional environment in and around major metropolitan areas depends on making central cities desirable places to live. Central city success would reduce demand for the development of open space. It would encourage development patterns that would achieve the density required to make mass transit an efficient large-scale substitute for the automobile. Making central cities desirable places to live depends not only on public and private physical improvements in cities, but also on improvements in their social and economic conditions.



THE LEAGUES OF WOMEN VOTERS OF KING COUNTY

KING COUNTY SOUTH • LAKE WASHINGTON EAST • SEATTLE

February 28, 1994

Mr. Jim Reid, Manager
Planning and Community Development Division
Parks, Planning and Resources Dept.
707 Smith Tower Building
506 Second Avenue
Seattle, WA 98104

Re: Draft Supplemental Environmental Impact Statement for the Countywide Planning Policies

Dear Mr. Reid:

The Leagues of Women Voters of King County have reviewed the DSEIS for the Countywide Planning Policies and offer the following comments:

Scope of the SEIS

It is important, in light of comments raised at the February 9 public meeting before the Metropolitan King County Council and elsewhere, that the public be clear about what the SEIS is expected to do and what it is not. The July 1, 1992 ordinance adopting the Countywide Planning Policies states that the SEIS will "...analyze the impacts of the proposed set of refined policies and will consider reasonable alternatives to those policies." It further states that "The SEIS will analyze the probable significant environmental impacts (emphasis added), including countywide impacts, of the proposed refined set of policies and reasonable alternatives to those policies."

IN-4
IN-4(a)
The adopting ordinance also called for separate additional work including further fiscal analysis, the purpose of which is to "...provide information on the anticipated financial and economic impacts on the individual, and on the private and public sectors..." Much of the additional information being requested of the SEIS is fiscal in nature rather than environmental, and we look forward to seeing it in the Fiscal Analysis Report.

This SEIS is a tool for analyzing the environmental impacts of a non-project set of policies and alternatives to the policies, and is supplemental to a number of other environmental documents. The Final SEIS will be published concurrently with a Fiscal Analysis Report and a Report to the Public which integrates the findings and recommendations of these two documents and of other task force work. The SEIS is one of a number of sources of information available to decision makers, rather than the sole means of informing their important decisions on refinements of Countywide Planning Policies.

Our expectations for this document must be realistic and related to the actual tasks assigned it by the legislative authority and to the purposes and requirements of SEPA.

LEAGUE OF WOMEN VOTERS
of Seattle
1402-18th Avenue
Seattle, WA 98122

LEAGUE OF WOMEN VOTERS
of Lake Washington East
12700 S.E. 32nd
Bellevue, WA 98005

LEAGUE OF WOMEN VOTERS
of King County South
P. O. Box 56037
Seattle, WA 98166

We found the Draft SEIS to be generally complete and on the whole to provide adequate analysis and information to guide decision makers. League readers of this document did have a number of specific suggestions and comments, which are being submitted as an addendum to this letter.

Format Improvements:

It is worth noting that many League readers felt the format of the SEIS could have been clearer; this need was most acutely felt in longer chapters such as Land Use. At the very least, the Chapter title and subject heading should appear at the top of each page, e.g. "Land Use : Significant Impacts - Urban Growth Areas, page 35." Headings within the text need to be coupled with subheadings, e.g. "Mitigation Measures - Mitigation Applicable to All Alternatives". The lack of delineation made it very easy for readers to lose their way amidst the numerous and repetitious topics and subsets of topics. This could be easily remedied in the Final document.

Analyze Proposed Changes:

One of the main purposes of Phase II of the Countywide Planning Policies is to provide a framework in which decision makers can consider possible refinements to the CPP and the consequences of these refinements. The alternatives as framed in the DSEIS do provide a framework for analyzing the consequences of important choices. To the degree that such choices entail major policy shifts from the adopted 1992 CPP, such as reconsideration of the issue of business parks, the final SEIS needs to be sure that probable consequences of such proposed actions are clearly spelled out. The questions posed by the City of Seattle, which appear in the DSEIS, point out the need for this analysis.

Consider Modification of Urban Centers Criteria

We understand that the Final SEIS as currently planned will contain a preferred alternative. As we stated in our comments before the Metropolitan King County Council on February 9 (see attached) we believe the SEIS analysis would be enhanced by minor modification of the Urban Centers Criteria in order to better evaluate this alternative and it meets the SEPA criterion of "reasonable". Such modification might include a return to the "hierarchy" concept contained in Vision 2020, an acknowledgment that some nominated centers might not meet the criteria within the 20 year planning period, or the suggestion appearing in the mitigation section of the Land Use chapter of the SEIS (p. 51) that the cities could be provided with more flexibility in defining the "geographic extent" of the urban centers. These proposals are not mutually exclusive, and all bear serious consideration.

Urban Growth Areas/Boundaries:

The League is concerned about the location and stability of the Urban Growth boundaries, especially the so-called Urban/Rural Line. While there may not be a 100% correlation between the location of the main Urban Growth Boundary and the ability of Urban Centers and other urban areas to attract growth, there is clearly a relationship. If the UGA is to be used as a major growth management tool, as GMA says it must, then we should use it with care, and in very deliberate concert with the other tools at our disposal

so that they work together in a balanced way to achieve the desired ends. Lessons learned from the Portland UGA experience include the fact that sprawl results from a too-large urban growth boundary, and that tools must be identified to assure that the rural areas immediately outside the line do not develop in ways that preclude later urbanization. The SEIS addresses these matters tangentially; the FSEIS should provide more focus to this discussion.

Regulatory Reform as Mitigation:

The League supports the efforts now underway at all levels of government to reform our regulatory system and to rationalize and simplify our existing body of codes, regulations and laws. The issues of regulatory burdens, their impact on growth management, and the need for reform have been noted in the SEIS in appropriate contexts. We think one facet of this is particularly worth mention. The Governor's Regulatory Reform Task Force is looking at the idea of reducing SEPA requirements for projects which comply with Comprehensive Plans and locate within areas targeted for growth by these plans. For areas such as Urban Centers, this would provide a major mitigation for the delays and expenses associated with the permitting process in large jurisdictions. In conjunction with the pre-application design review/dispute resolution process envisioned by the Magnet alternative for urban neighborhood development, this could significantly ease the frustrations and burdens now encountered by proponents of urban projects. Both proposals are mentioned in the revised Economic Development Policies and alluded to briefly in the body of the SEIS. We believe they deserve more attention in the Final SEIS as major mitigation measures.

Monitoring and Evaluation Needed:

Finally, we join many others in endorsing the Magnet proposal's support for a strong monitoring and evaluation program for all facets of growth management planning. We agree with the use of Benchmarks and Indicators as key tools in this effort and strongly suggest that full public participation be used in their development. The model used by Sustainable Seattle in developing its recently published Sustainability Indicators was a good and broadbased process which should be considered for use in growth management benchmark development at the local and county level.

Please note the attached specific comments from League members on the various elements of the SEIS. Thank you for this opportunity to comment.

Sincerely,

Jan O'Connor
Jan O'Connor, Pres.
LWV Seattle

Belinda Pearson
Belinda Pearson, Pres.
LWV Lake WA East

Marion Calhoun
Marion Calhoun, Pres.
LWV King County South

IN-8

RECEIVED

FEB 23 1994

PODD

January 23, 1994

Lisa Maudsl, Growth Management Project Supervisor
Planning and Community Development Division
King County Parks, Planning and Resources Department
707 Smith Tower
506 Second Avenue
Seattle, Washington 98101

Dear Ms. Lisa Maudsl:

In review of the Draft Supplemental Environmental Impact Statement for the County Planning Policies Document of January 12, 1994

I could comment for a long letter to the Draft in question, but will make it as brief as possible.

The planning alternatives of no action, 8 centers, 14 centers and flat for a period of 20 yrs.

From a view point of cost of doing business, in the high densities area's. The cost of expanding a business in a tight developed area is not cost effective. Because it would cost too much to purchase developed property to expand one's business. As of down town Seattle right now. The stores are closing because the cost of doing business in a compacted area. Now this draft wants to impact the area more. Driving the small business to close and move out of the area. Most of the people of the North West does not want another New York or a Los Angeles. It is stressful to try to commute, shop and try to carry your shopping purchases and try to get home in the already grid lock area. As you can see the businesses are closing their doors and taking the white off's and moving out, and relocate some place else. Move them fully out of the planning area. This is the way of history of business has performed.

As for the Multiply housing and High densities area. This has an adverse effect on the quality of life for all persons living in King County. The statistics show that the more people living in a compacted area. There is more crime, more chance of traffic grid lock. Health hazards. All this triggers the sanity breaking point, to massive shootings, burglaries, rapes, assaults, and family disturbance. More and bigger fires which are harder for the fire department to have access to. Which results into more property tax's per everyone in the county to pay for.

The affordable housing is a joke. I know people that are not making the \$12,000.00 per year so they don't qualify. Because they don't make enough. What about the people, with the only source of income is SSI. Their income is so low they don't qualify what are you going to do with them.

Page 2

The State of Washington and King County has not had a real bad economy down turn in 30 yrs. Some up's and down's but has always a had a quality of life unequal to all other States. As of now with just some of the recent environmental rules that have been imposed, we are losing a lot of small business people. You have heard from some of the bigger commercial manufactures of late. Such as Boeing Co. and Microsoft Co. that the cost of doing business in the State of Washington and King County is to high. This draft will impact that decision even more.

Everything in this draft is based on X factor, Crystal Ball future teller, Assumptions, Rough estimates, and none have affirmative figures. This is another Blank Check to the King County Council, that will have to be paid for by the already oppressed City and rural taxed payer. This hole mess should be VOID before we have more OVERDRAWT. On our County resources.

The 1981 County Wide planning policies should be good enough as it stands, with out this guess work of crystal BALL, MAGIC WAN and ASSUMPTIONS.

SEVERELY
[Signature]
Roger A. Vance
17836 Cedar Grove Rd
Maple Valley, WA 98038

cc: Chris Vance Chair
Rebecca Cusack Lead Staff
Brian E. Denbowe Councilman

EC-12

LA-11(a)



THE CITY OF REDMOND
PLANNING DEPARTMENT

February 28, 1994

Mr. Jim Reid, Manager
Planning and Community Development Division
Parks, Planning and Resources Department
707 Smith Tower Building
506 Second Avenue
Seattle, Washington 98104

Subject: Comments on the King County Draft Supplemental Environmental Impact Statement for Amendments to the Countywide Planning Policies

Dear Mr. Reid:

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Statement (draft SEIS) for the amendments to the Countywide Planning Policies (CPPs). As you know, Redmond participated in the development of the current countywide planning policies and the amendments. Redmond will continue to participate in this process and the designation of the urban centers through the Growth Management Planning Council and other appropriate forums. We appreciate King County acting as lead agency for the amendments.

This letter focuses on broad issues as pointed out by the SEIS. As a result, we may propose amendments to the CPP policies through other forums. In general, the draft SEIS is a useful and adequate discussion of the potential impacts and mitigating measures for the various alternatives.

Urban Centers Alternatives

It appears that the fourteen urban centers alternative has many significant advantages over the other alternatives. The fourteen centers alternative allows greater locational choice than the eight centers alternative. This will help capture growth that wants to locate within a specific area of King County and that would locate in an urban center, if one is available in that area.

While for some purposes King County operates as a single real estate market, there are wide differences in locational preferences. These preferences are based on many factors including the location of jobs or employees, proximity to contractors or services, proximity to other uses, unmet market demand, personal preferences, and differing types of amenities. Some of these

Mr. Jim Reid
February 28, 1994
Page 2

preferences are important to the regional growth management strategy. For example, enabling people to live near their jobs by providing more job centers has the potential to reduce traffic congestion, air pollution, and sprawl.

The eight centers alternative designates five centers in Seattle, one in Bellevue, and one in Renton. This leaves large parts of the urban area without a center to accommodate growth, growth that will take place outside centers, frustrating the regional strategy. For this reason, it appears that the 14 centers alternative better meets regional growth management goals and the goals of the Growth Management Act.

The draft SEIS concludes that the fourteen centers alternative is likely to have the least environmental impacts over the long term. This conclusion appears rational because although the fourteen centers alternative will have the greatest impacts within the centers, it presents the best potential to reduce trips while enhancing the movement of people and goods, and should therefore result in reduced air pollution. The fourteen centers alternative is the most compact, will consume the least vacant land, and will reduce pressure to convert resource lands, rural areas, and existing residential neighborhoods to urban uses.

The fourteen centers alternative will also work better with a light rail system. If the light rail system includes regional attraction centers to intercept trips and aggregate trips for the light rail routes, the fourteen centers will be the logical attraction sites and provide the best fit with light rail. The fourteen centers alternative would also work well with other high capacity transit systems.

Perhaps the greatest concern with the fourteen centers alternative is whether there will be adequate growth to develop fourteen urban centers. The SEIS shows that a fourteen centers alternative will capture significantly more growth in urban centers than the eight centers alternative. In addition, the fourteen centers alternative will help ensure that capacity is available to meet demands beyond the current twenty year planning horizon.

Those who favor fewer centers cite a concern that more centers will mean less public money available for investments in each center. Actually, it appears more centers in more cities will mean more public investment. A greater number of centers will encourage more local governments to support the use of regional money for investments in centers. In addition, the more local governments that are involved, the more local sources of funding for centers. Therefore, 14 centers will likely trigger more investment in centers and increase the chance of long term success.

LA-5
LA-9

Mr. Jim Reid
February 28, 1994
Page 3

Recommended Data Correction:

The draft SEIS says in several places that the 14 centers alternative does not have sufficient housing capacity based on existing zoning. See pages XIV, 14, and 29. In particular, the draft SEIS on page 29 states that of the six proposed centers added beyond the eight centers, only the Kent central business district has capacity to meet the fifteen households per acre criterion for an Urban Center under current zoning. This is incorrect. Under current zoning adopted in late 1993, the Redmond Downtown Urban Center has the capacity for 7,826 dwelling units. This translates into 19.3 dwelling units per acre. Enclosed with this letter are several tables that show Redmond's current capacity to accommodate residential and employment growth.

This point is raised not only to request that the analysis be corrected, but also because decisions on the suitability of an area for urban center status should be based on the comprehensive plans and development regulations adopted to comply with the Growth Management Act. As noted above, Redmond has adopted a new downtown plan, zoning, and design standards. These provisions will be incorporated into our Growth Management Act comprehensive plan and development regulations. Besides providing for a residential density of 19.3 dwelling units per acre, the plan and zoning provide for 83.5 employees per acre. The new design standards also promote superior urban design. As of December 1993, the Redmond central business district complies with all of the urban centers criteria in the Countywide Planning Policies. Other new Growth Management Act plans will also likely show similar levels of compliance. These efforts should be noted in the revised data charts.

Urban Centers Criteria

An important purpose of urban centers is to "support an extensive transportation system to reduce dependency on automobiles." (*King County Countywide Planning Policies*, p. 20). To fulfill this purpose, according to transit studies, the center criteria should allow the designation of urban centers that have large numbers of employees at high densities, that will generate significant numbers of transit trips, and that can be well connected to residential neighborhoods through walking, biking, transit, and other alternative means of transportation.

Unfortunately, the existing urban centers criteria discount the importance and benefits of nearby housing at transit supportive densities (8 housing units per acre or greater). The existing criteria require all the housing to be within the centers. If these criteria are not met, areas with significant job concentrations and less housing cannot be designated centers despite their close connections to housing.

Mr. Jim Reid
February 28, 1994
Page 4

Retaining these criteria will frustrate regional efforts to contain growth in two ways. First, the region will not recognize these areas as the major regional assets they are. This may result in infrastructure investment policies which discourage new growth from locating in these areas. While some of this growth may go to urban centers, some jobs will locate in more scattered areas that may not be as suitable for accommodating development from a regional growth management perspective.

Recommended Changes to the Urban Centers Criteria:

To avoid these problems, the urban centers criteria should be modified to give more flexibility in designating urban centers. In particular, the criteria should allow the designation of urban centers that have major job concentrations and that can be tied to nearby residential areas through walking, bicycling, transit, and other appropriate means. There are criteria, identified in transit studies, that can be substituted for the existing criteria.

The draft SEIS identifies changes to the urban centers criteria in the Countywide Planning Policies as potential measures to mitigate likely impacts on urban form (see page 51). These changes should be considered. By incorporating changes to the urban centers criteria similar to those proposed in the draft SEIS, significant concentrations of employment can be recognized and impacts generated by urban centers can be reduced. The changes will also allow urban centers to better fit within the existing development patterns in the region and local communities.

Finally, the Countywide Planning Policies should be amended to provide a process for designating urban centers and manufacturing/industrial centers in the future. As the region grows and develops, more urban centers and manufacturing/industrial centers may be needed. For example, the Growth Management Act requires that urban growth areas and densities within urban growth areas be evaluated every ten years. If the concept of a permanent urban growth area is to be retained, more urban centers may need to be designated over time. Similarly, the new economic development policy amendments to the Countywide Planning Policies require that King County jurisdictions plan for a 10 percent increase in manufacturing jobs. This will require the designation of new manufacturing/industrial centers in the future.

In addition, during the comprehensive plan review process, some cities may decide to amend or withdraw their current nominations. The urban centers process needs to be able to accommodate these changes.

Mr. Jim Reid
February 28, 1994
Page 5

The Proposed Amendments to the Countywide Planning Policies

Several proposed amendments to the Countywide Planning Policies may be enacted in 1994. The proposed Countywide Planning Policy amendments should contain an effective date that will allow local governments time to implement them without disrupting their efforts to meet the Growth Management Act deadlines set for 1994. Since the amendments will likely not be adopted until late spring, it will be difficult to modify proposed plans to incorporate all of the amendments. A two-year phase-in period would be appropriate.

The ideas contained within the proposed affordable housing amendments provide a rational way to meet pressing needs. Redmond has long supported actions to increase affordable housing. Redmond was one of the founding members of A Regional Housing Coalition (ARCH), the Eastside low- and moderate-income housing partnership. Over the past fifteen years, Redmond has provided areas suitable for multi-family housing and other affordable housing types. We also allow accessory dwellings, manufactured housing, and attached housing in most residential neighborhoods. These efforts by cities are not recognized in the amendments.

The proposed affordable housing amendments may need revisions to give adequate credit to local governments that have worked to provide affordable housing. The monitoring requirements should also be designed to use readily available data and to reduce monitoring and reporting costs where appropriate while meeting regional and local housing goals.

The Fiscal and Economic Development Task Force amendments to the Countywide Planning Policies, and the modifications suggested by the Suburban Cities Association, are also useful. Again, monitoring and reporting burdens on local governments should be the minimum necessary to achieve our regional economic development goals.

Redmond is also participating in the regional groundwater water purveyors aquifer policy development group. As you know, this group is preparing amendments to the Countywide Planning Policies to address aquifers that provide drinking water. We will be working with the other local governments in the region during the adoption of these policy amendments.

Mr. Jim Reid
February 28, 1994
Page 6

Again, thank you for the opportunity to comment on the draft SEIS. If you have questions, please contact me at 556-2447 or Tim Trohimovich at 556-2417.

Sincerely,

Roberta Lewandowski

Roberta Lewandowski, AICP
Director of Planning and Community Development

Enclosure

cc: Honorable Rosemarie Ives, Mayor of Redmond
Redmond City Council
Tim Trohimovich, Lead Planner, Growth Management Project

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COMMERCIAL EMPLOYMENT SUMMARY (By Jurisdiction and District)

28-Feb-94

Jurisdiction	District	1993 Base Year			2010 Forecast Year				Projected Change, 1993 to 2010				
		Office	Retail	Industrial	Total	Office	Retail	Industrial	Total	Office	Retail	Industrial	Total
Redmond	Education Hill	090	0	93	003	1,061	18	93	1,172	171	18	0	109
	Grass Lawn	147	7	0	154	157	25	0	181	10	18	0	27
	North Redmond	22	0	20	50	61	19	33	113	39	19	5	63
	Overlake	16,095	1,512	1,383	19,708	31,135	1,711	2,961	36,750	14,240	199	1,578	16,962
	Redmond CBD	2,427	1,061	293	4,679	7,824	3,255	143	11,220	5,397	1,294	-150	6,541
	S.E. Redmond	740	139	4,927	5,804	5,499	884	6,353	12,737	4,759	745	1,426	6,933
	Samm. Valley	1,098	0	4,172	5,070	2,118	0	4,556	6,674	420	0	384	804
	Viewpoint	36	0	0	36	36	0	0	36	0	0	0	0
	Willows	1,601	53	1,722	3,377	3,247	58	1,750	5,051	1,546	5	28	1,674
Subtotal		24,456	3,672	12,618	40,741	51,137	5,969	15,889	73,934	26,681	2,297	3,271	33,193
Kirkland	East Kirkland	1,285	2,767	994	6,138	2,187	3,037	1,579	7,095	903	270	584	1,757
	West Kirkland	8,864	3,200	2,688	15,959	10,795	4,546	3,916	20,722	1,931	1,346	1,228	4,763
Subtotal		10,149	5,968	3,683	22,098	12,982	7,583	5,495	28,617	2,834	1,616	1,812	6,520
King Cty.	East Northshore	6,110	3,698	2,401	12,708	9,932	6,361	6,786	23,608	3,822	2,663	4,305	10,902
	North Union Hill	133	81	45	271	655	372	138	1,177	522	291	93	906
	South Union Hill	495	235	1,193	1,943	837	561	1,187	2,600	342	326	-6	657
	West Northshore	4,112	1,099	1,066	7,347	6,335	2,466	2,443	11,715	2,223	567	1,377	4,368
Subtotal		10,850	5,013	4,785	22,267	17,759	9,760	10,554	39,100	6,909	3,847	5,769	16,833
Bellevue	Bellevue CBD	14,764	3,506	156	21,637	23,357	5,278	156	32,952	8,593	1,771	0	11,315
	East Bellevue	12,331	1,000	1,297	20,733	14,754	2,104	1,876	23,996	2,424	224	579	3,227
	North Bellevue	15,574	5,907	4,820	28,665	18,127	6,514	5,581	32,585	2,553	607	760	3,920
	South Bellevue	4,997	2,306	118	7,921	6,709	2,762	118	10,089	1,712	456	0	2,168
	West Bellevue	9,381	904	364	11,198	9,805	974	551	11,880	424	70	186	681
	Subtotal		57,047	14,503	6,756	90,191	72,752	17,633	8,262	111,502	15,706	3,130	1,525
Grand Total		102,501	30,056	27,841	175,296	154,630	40,945	40,220	253,153	52,129	10,889	12,378	77,856

City of Redmond

1

Planning Department

RESIDENTIAL UNIT SUMMARY (By Jurisdiction and District)

28-Feb-94

Jurisdiction	District	1993 Base Year			2010 Forecast Year			Projected Change, 1993 to 2010		
		SF	MF	Total	SF	MF	Total	SF	MF	Total
Redmond	Education Hill	2,832	2,295	5,127	3,152	3,022	6,174	320	727	1,047
	Grass Lawn	1,536	836	2,372	1,596	877	2,473	60	41	101
	North Redmond	235	0	235	3,937	0	3,937	3,702	0	3,702
	Overlake	1,555	2,279	3,834	1,885	2,137	4,022	330	-142	188
	Redmond CBD	81	1,031	1,112	24	2,736	2,760	-57	1,705	1,648
	S.E. Redmond	445	773	1,218	2,209	1,371	3,580	1,764	598	2,362
	Samm. Valley	75	248	323	93	851	944	18	603	621
	Viewpoint	1,472	1,023	2,495	1,698	1,176	2,874	226	153	379
	Willows	612	1,068	1,680	1,280	1,223	2,503	668	155	823
Subtotal		8,843	9,553	18,396	15,874	13,393	29,267	7,031	3,840	10,871
Kirkland	East Kirkland	2,794	2,354	5,148	4,282	2,767	7,049	1,488	413	1,901
	West Kirkland	6,072	7,516	13,588	6,978	9,366	16,344	906	1,850	2,756
Subtotal		8,866	9,870	18,736	11,260	12,133	23,393	2,394	2,263	4,657
King City	East Northshore	11,044	2,000	13,044	17,490	2,668	20,158	6,446	668	7,114
	North Union Hill	2,731	20	2,751	4,050	37	4,087	1,319	17	1,336
	South Union Hill	2,603	58	2,661	4,348	256	4,604	1,745	198	1,943
	West Northshore	15,297	4,082	19,379	19,034	5,739	24,773	3,737	1,657	5,394
Subtotal		31,675	6,160	37,835	44,922	8,700	53,622	13,247	2,540	15,787
Bellevue	Bellevue CBD	356	999	1,355	383	2,485	2,868	27	1,486	1,513
	East Bellevue	7,625	3,972	11,597	8,066	5,222	13,308	461	1,250	1,711
	North Bellevue	5,967	7,782	13,749	6,232	8,126	14,358	265	344	609
	South Bellevue	10,741	1,954	12,695	12,628	2,564	15,192	1,887	610	2,497
	West Bellevue	6,457	3,240	9,697	6,546	3,600	10,146	89	360	449
Subtotal		31,146	17,947	49,093	33,875	21,997	55,872	2,729	4,050	6,779
Grand Total		80,530	43,530	124,060	105,931	56,223	162,154	25,401	12,693	38,094

City of Redmond

RESSUM — 1

Planning Department

J. Terry Lewis
Corporate Director
Local Government Affairs

The Boeing Company
P.O. Box 3707, MS 14-49
Seattle, WA 98124-2207

Forrest G. (Bud) Coffey
Vice President
Government Affairs

The Boeing Company
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February 24, 1994
CORRECTED COPY

EX-10 2-28-94

Jim Reid, Manager
Planning And Community Development Division
Parks, Planning And Resources Department
707 Smith Tower Building
506 Second Avenue
Seattle, Washington 98104

BOEING RE: Draft Supplemental Environmental Impact Statement for King
County Countywide Planning Policies

Dear Mr. Reid:

On review of the Draft EIS for the Countywide Planning Policies we find that the analysis does not address all concerns we expressed in our letter to the County Executive of May 26, 1992 regarding the Countywide Planning Policies (CPP's). See attached copy. While it may be necessary to address these policies on a very programmatic level, the analysis should provide decision makers with sufficiently detailed information to make decisions.

IN-2 The Draft EIS has effectively documented all discussions of the policies that have occurred to date and identified a number of future data sources, but it has fallen far short of an effective policy analysis. Until and unless the impacts of the proposed and alternative Countywide Planning Policies have been quantitatively assessed and compared, we do not believe it meets the substantive requirements of the State Environmental Policy Act. More importantly, it provides no objective basis for the county, its citizens or its major employers to make effective decisions.

We suggest that the Countywide Planning Policies be modified to conform to the level of detail that can be adequately analyzed and that analysis of the detail in the current CPP's be deferred to comprehensive plan adoption. The level of detail contained in the framework policies is inappropriate for this stage of analysis.

Sincerely,

J. T. Lewis
J. T. Lewis

Enclosure

May 26, 1992

BOEING The Honorable Tim Hill
King County Executive
King County Courthouse
516 Third Avenue, Room 400
Seattle, Washington 98104-3271

Re: King County Proposed Growth Management Policies

Dear Mr. Hill:

This is in response to your letter of April 10, 1992 to Mr. Frank Shrontz, Chairman, President and CEO of The Boeing Company, seeking comments on the proposed King County Growth Management Policies. We thank you for the opportunity to participate.

Our initial review indicates that the proposed policies will have a significant impact on Boeing's ability to do business in the County, as well as a substantial impact on employees' ability to find affordable housing. The proposed policies will also significantly impact suppliers who are located in or are considering locating in the County. Indeed, we are concerned that the policies do not reflect a basic premise in your letter -- that "quality of life begins with a job." And we are concerned that these policies, if adopted as proposed would severely endanger the general economic vitality of the Northwest.

We offer both general and specific comments on the proposed policies. Our general comments are contained in this letter, while suggestions for specific language changes will be submitted within the next days.

1. A NEED FOR BALANCE

Your letter indicates that the proposed policies are an "attempt to balance economic development with environmental concerns." We do not believe that balance has been achieved.



The Honorable Tim Hill
May 26, 1992
Page 2

The policies view economic and population "growth" solely in negative terms:

The effects of growth are obvious. King County has the fifth worst traffic mess in the nation, declining air and water quality, flooding aggravated by development, and escalating housing costs. Many of the schools are overcrowded and local governments are struggling to pay for increased demands for services to control crime and to provide critical human resources.

BOEING

While these are certainly issues we face because of unmanaged growth, growth also provides many of the very benefits that make Puget Sound attractive. We cannot afford an over-emphasis on the "problems" of growth any more than we can afford to ignore those problems. Ignoring the benefits growth provides, and failing to adopt policies to protect and encourage a strong economy, is not good planning--balance is indeed required. In fact, the establishment of a manageable economic growth rate would seem to be a prerequisite of policies intended to manage the adverse impacts of growth.

The legislation upon which these policies are based recognizes this need for balance. The GMA was not designed to eliminate or even limit growth; it was designed to ensure adequate planning for growth. The GMA recognizes that unplanned growth is a danger and that sustainable economic development is a goal:

The legislature finds that uncoordinated and unplanned growth together with lack of common goals expressing the public's interest in the conservation and the wise use of our lands, pose a threat to the environment, sustainable economic development, and the health, safety, and high quality of life enjoyed by residents of the state.

2. ECONOMIC POLICY

We recognize that the proposed policies contain an "economic development" element, but suggest that it needs to be substantially strengthened. While the policies would establish a goal of economic "sustainability," they do not address an economic goal of balanced and manageable growth. The future existence of the current economic base cannot be assumed. Instead, the County must embrace a goal of manageable economic growth. Only with both growth rate and growth management goals, can balance can be achieved. We suggest that the policies establish a growth and employment rate as a goal -- a goal that, if met, could provide the strong regional economy we all seek, but that also allows the adverse effects of growth to be managed.

The Honorable Tim Hill
May 26, 1992
Page 3

Your letter indicates that comments made by the King County Development Council at your request were integrated into the policy framework. We have reviewed those policies and find that the concepts and policies they offered are not adequately reflected in the proposed policies.

3. IMPACT OF INEFFECTIVE REGULATION

BOEING

Effective planning policies must recognize that one of the more substantial threats to quality of life in King County is the impact of local government and the quality and effectiveness of regulation imposed. The duplicative, time-consuming, costly land use permitting and approval processes pervasive in local government is no secret. The quality and effectiveness of our land use permitting and approval process must be substantially improved if growth is to be effectively maintained and managed. To our knowledge, no other state has both a Growth Management Act and a State Environmental Protection Act. Excessive costs of development in the form of impact fees, SEPA mitigation measures and permit conditions threaten economic vitality. We believe that an economic fiscal and policy impact analysis should be completed to assess the potential impact of these proposed policies.

4. AFFORDABLE HOUSING

We support the goal and policies to provide affordable housing. But other factors may defeat successful implementation.

As the President's Advisory Commission on Regulatory Barriers to Affordable Housing concluded, local jurisdictions should attempt to remove regulatory barriers to affordable housing. The Commission recommended specific strategies to remove barriers to affordable housing:

1. Education of the public on the cost and effect of regulation on the affordability of housing.
2. Elimination of over zealous wetland regulations.
3. Elimination of exclusionary zoning (e.g., large lot single family zoning).
4. Elimination of regulations that exclude manufactured housing from residential zones.

The Honorable Tim Hill
May 26, 1992
Page 4

5. The provision of adequate land for a variety of housing types and densities.
6. The elimination of excessive site development regulations.
7. Development of a one-stop permitting process.
8. A comprehensive and systematic review of all development regulations and administrative procedures to identify excessive, duplicative, or unnecessary barriers to housing affordability and opportunity.

King County planning policies should address these very important issues.

5. OVERLY DETAILED

The proposed policies seem to go beyond the specificity required by the GMA. In particular, the great amount of substance contained in the policies preempts the GMA's goal of retaining local control over land use regulations. In fact, while the GMPC contains some representatives from cities in the County, unincorporated county residents have had little chance to provide their views during formulation of the proposed policies. Contrary to the GMA, detailed policies will impose sharp limitations on cities ability to fashion appropriate local land use decisions.

For example, the proposed minimum employment for urban centers is 50 employees per acre. The basis for the density requirement is not apparent. The maximum proposed for the Boeing Everett plant under a recent EIS is about 33 employees per acre, on a very developed site, that generates millions of dollars of revenues to state and local government. These policies would appear to preclude that type of plant in King County.

6. UNFORESEEN EVENTS

The proposed policies seem to give little attention to unforeseen circumstances. Planners and policy makers cannot realistically assume that nothing more is to be learned as we proceed through the next twenty years. For instance, many of the proposed policies contain language suggesting permanent land use designations. It is unrealistic to believe that no unforeseen circumstances could alter the basic assumptions underlying the policies. The policies should provide alternatives and analysis for differing economic situations, population impacts, and transportation schemes.

The Honorable Tim Hill
May 26, 1992
Page 5

7. STATE ENVIRONMENTAL POLICY ACT

The impact of the policies should be carefully analyzed under the State Environmental Policy Act. We are also concerned that the County has undertaken no study to determine the economic, fiscal and social impact of these policies. The proposed adoption of prior existing environmental documents without a comprehensive and detailed supplemental environmental impact statement suggests haste rather than care. We suggest that preparation of an environmental impact statement be embraced as an opportunity to provide the full analysis these policies deserve, and to provide the foundation from which a balance between a manageable growth rate and growth management policies can be struck.

We are especially concerned that the absence of an adequate EIS means the absence of analysis of alternative policies. That is, the impact of the policies proposed must be compared to the impact of other alternative policies. For example, the impact of policies that emphasis control of assumed growth must be evaluated against the impact of policies that would promote manageable growth and effective local government land use regulations.

8. INTERNAL INCONSISTENCIES

We question whether the proposed policies are internally consistent. Without weighting or prioritizing goals which may conflict during implementation, adequate environmental and fiscal reviews become even more necessary. Even so, inconsistencies seem obvious. For instance, increased density without adequate land supply will not further the affordable housing goals. And without inventory and environmental analysis, capacity and land supply are unknown.

9. NEED FOR THOUGHTFUL DELIBERATION

While a July 1, 1992 deadline drives the present adoption process, the Governor has indicated that a good faith effort to comply with the deadline will prevent the imposition of sanctions for noncompliance. Amending the policies in the future will be a very difficult process. As you know, adoption of the Countywide policies is an extremely important part of the overall planning process required by GMA. Now is the time to use the resources necessary to achieve a workable policy document for the County.

The Honorable Tim Hill
May 26, 1992
Page 6

Finally, Boeing also requests that you again consider the importance GMA gives to these policies. As you know, the Countywide policies are the first step to the extensive planning efforts required under the GMA. They will form the very backbone that will control the direction, emphasis and content of the Comprehensive Plans and the implementing regulations that will directly impact Boeing, its employees, and all other King County residents. The County should evaluate the growth management policies against a manageable economic growth rate. Without policy analysis of the policies, only trial and error can test their effectiveness. Managed growth must be our mutual goal.

Again, we appreciate the opportunity to participate in this process and look forward to the opportunity to comment on future drafts of the proposed policies.

Very truly yours,

Forrest G. Coffey

Forrest G. Coffey

cc: Growth Management Planning Council
King County Council

JLMcINTOSH
COMMERCIAL REAL ESTATE SERVICES

February 22, 1994

Mr. Jim Reid, Manager
Planning and Community Development Division
Parks, Planning and Resources Department
707 Smith Tower Building
506 Second Avenue
Seattle, WA 98104

RE: COMMENTS ON KING COUNTY DRAFT SEIS,
COUNTYWIDE PLANNING POLICIES

MY QUALIFICATIONS TO COMMENT

I am a third generation native of Seattle, and I have been a real estate broker since 1956. I have specialized in large land acquisitions and the subsequent build-out and marketing of over 5000 lots and homes. Additionally, I have been President of M & H Development for 20 years. M & H Development develops single-family subdivisions in King County. I have been monitoring the GMPC, Rural Task Force and the FIS/ED meetings from the beginning of the GMA process.

OVERVIEW

The Four County Central Puget Sound Region's version of the GMA has been guided by Vision 2020, which is a plan that was originally done in the 1980's to justify building rapid transit by concentrating dense population in existing Seattle neighborhoods. This would also help fund Seattle's old and failing infrastructure (road, water and sewer lines), and would also support cost of construction in the adjacent out-lying cities by forcing people by regulation to live and work close to the rapid transit and/or rail lines - essentially, changing peoples' behavior by forcing them out of their own automobiles into public forms of transportation.

THE PROBLEMS

The behavior of people in the marketplace cannot be repealed by government regulation and social planning, particularly when done in a vacuum without respect to all the alternatives available to the people outside the vacuum - in this case outside King, Pierce, Snohomish and Kitsap counties. The plan assumes that there are no other choices. This is incorrect. There are many other counties in Washington and other states that would love to have some of our

perceived growth problems. I doubt that there's an area anywhere in the country that wouldn't love to have a Boeing or Microsoft. In the end, the success or failure of this plan will be determined by economics of the marketplace, so we'd better get it right.

To date, the economic impacts of implementing the GMA have not been addressed and are unknown. Perhaps the problem started with the GMPC's assumption that Vision 2020 was good and the only solution. No other alternatives would work. We have since been finding ways to justify that result. In the past three years of the GMA process, the market has changed. More people are beginning to realize that the King County market is not invincible and perhaps there are other alternatives - or at least it causes people to begin to question the real costs of this plan.

IN-2
Another problem has been the artificial deadlines imposed by the legislature that have twice been extended, and should certainly be extended again. If realistic time lines had been imposed originally, perhaps local decision makers would have not felt the pressure to try and revive an on-the-shelf transportation document (ic. 2020). However, two wrongs do not make a right. Perhaps it's time with the new Metropolitan Council, to step back and say, "This is too important to the future of our area! We need to do this right! We need to look at all the alternatives!" And there are other alternatives not being considered in this SEIS that can accommodate the growth, protect the environment, be appealing to the marketplace, and be accomplished for far less money.

My specific SEIS comments are as follows:

LAND USE

A-1(a)
A-2
A-3
A-1(e)
A-1(d)
I will assume that the reader is aware of the assumptions made by Data Resources Technical Forum. In all cases the maximum yield permitted by zoning was assumed after discounting for critical area constraints. It is not realistic to assume maximum development yields for the following reasons: King County has never come close to meeting its density goals, nor have any of the suburban cities. There are generally good reasons why close-in properties remain vacant. In my own case, for example, I have three lots in Bellevue. My house is in the middle lot and I have no intention of selling or building on the other two lots - but Bellevue counted my lots, missing by 66%. A land capacity analysis done by Paragon, Inc. in October 1992, estimated that D.R.T.F. had over-estimated capacity by a factor of 3 to 1. I and many other professionals believe it is closer to 5 to 1. They have also missed the mark on areas that will redevelop, particularly on commercial properties. There is a whole maraud of reasons which include costs of potential liabilities of demolition; the unknowns of hazardous and contaminated sites (is the writer aware that Washington State has so far tested 68 sites and put all 68 sites on the list? What are the dollar consequences? Very risky.); cost of relocating during construction; and neighborhood resistance, to name a few. Market realities must justify economic feasibility. We must have good data. At the present time supporters are using smoke and mirrors. Look at the FIS/ED Duwamish case study. If Boeing could not make the

numbers work when they already own the land, how can someone else do it who must additionally pay for the property?

LA-4(a)
Comment on pages 24 and 25, Impacts Across County Borders, 3rd, 4th and 5th paragraphs: Quotes, "Statistics on King County share of regional development is on decline from 1985 - 47.7% down to 1992 37.5%, and lots applied for and recorded 1990 King County share was 51% declining in 1993 to just 5%." The writer then states, "These changes in activity have occurred in advance of implementation of the C.P.P. and are most likely due to other factors."

HO-6
LA-9
This astute observation ignores the obvious. Ask any professional realtor, home builder or developer and they will tell you it is caused pure and simple by high cost of land and by King County Government over-regulation which has driven up cost and processing time to the point that newly developed product cannot compete in the marketplace. People are choosing to drive longer distances for substantially better values. Nearly two-thirds of the development industry is gone because they don't have to put up with all this unnecessary regulation in other counties and states. The present C.P.P.'s and the urban centers plan is more government intervention and regulation and will develop an even less desirable end product. People are not moving into high rises in the cities where there is more crime, fewer parks, amenities and poorer schools - they're going the other way. I refer you to The 1992 Fannie Mae National Housing Survey, one of the most comprehensive assessments ever taken of American attitudes on housing and home ownership. It determined that "80% percent of all Americans said they preferred the traditional single family detached home with a yard as their ideal place to live." I understand that the City of Seattle has just completed a study that also essentially supports the above Fannie Mae Survey. Yet the current C.P.P.'s are trying to force over 60% of the market out of their cars and into high-rise or mid-rise that they wouldn't be able to afford if they wanted it, which the study indicates they don't. I doubt you'll find many lenders anxious to loan money on this type of scenario.

The writer's statement, "A shift in people's general attitude must occur in order for this more concentrated pattern of development to happen ... to the extent that shifts in attitudes do not correspond with the County's desired allocation of growth, development may begin to leave the County and locate elsewhere in the region." This is probably the most accurate statement in the entire SEIS.

URBAN CENTERS

LA-6
What are the real costs associated with urban centers - costs of replacing the old and resizing the new infrastructure? What will be the total costs from start to finish? It is only after you have determined the total costs including all impacts and mitigations that you will be able to judge the marketability of the product. Only the top 10% (I'll bet it is closer to top 2%) of the income bracket can afford the high rise structures. I believe this was borne out in the FIS/ED Bellevue and Seattle case studies. This will only exacerbate the traffic problem if the other 90% must commute.

Page 54 - Unavoidable Impacts - Urban Centers. *"Existing buildings may be torn down and replaced by higher density development. Vacant land or open spaces may be developed. This could create a dramatic change in the character of the center. There is some question as to whether or not the targeted density of development recommended by the C.P.P.'s will actually occur, due to peoples' preferences for lower density development. It goes on to recommend local jurisdictions should work closely with residents and business to define a vision, etc."*

When push comes to shove and the urban centers are site specific, will the politicians be there to stand up to the impacted neighborhood groups? I'll bet not. This is not just adding a few apartment buildings to a neighborhood - this is a whole new lifestyle - the neighborhoods will come unglued when they understand.

EXECUTIVE SUMMARY

Page IX, second sentence states, *"Our goal is that proactive policies and strategies will provide strong stimulus for economic expansion."* What are they specifically? Let's get them out on the table and measure them against all the costs and see if the market can afford them. Will employers pay and lenders lend the added costs of vertical construction and subject their employees and customers to the frustrations this plan wants to force upon them? Or will they simply move their business to an area that is more friendly to the automobile and their employees' and customers' preferred lifestyles?

Page X, Executive Summary - *"The economic analysis to be provided by the FIS/ED Task Force will examine the costs, particularly in regard to their impact upon individuals, businesses and public sector."* I have monitored virtually all of the FIS/ED meetings. If I were a member I would take personal offense to such a statement. The FIS/ED Committee, in my opinion, which is by far the most responsive and knowledgeable group involved in the process, has not been presented with numbers that will allow them to access the impacts upon individuals and businesses. They have been given some vague, unproven and I believe inaccurate information relative to the public sector.

REGULATORY REFORM

None of the GMA strategies and reforms should be implement until their effects are thoroughly understood. They can be very harmful to our environment, our economy and our way of life.

RURAL

SEIS comments, page 34, under Rural Character Policies states, *"The Rural Character Task Force asked the SEIS to evaluate the effect of down-zoning to 20 or 35 acre minimum lot sizes in rural areas."* I monitored every Rural Task Force meeting. They did not ask for this. After the Task Force recommended one unit per five acres, at the final hour the suburban cities

caucus asked the GMPC to add the request to study 20 or 35 acre zoning in the SEIS - suburban cities have a different agenda than the folks who participated in the Rural Task Force meetings.

Comment, page 66, Center Significant Impact, *"Total costs for high-rise construction are comparable to single family."* This is not correct.

Comment, Page 81 - *"39% Workers Possible Telecommuters."* If so, why on earth would they allow themselves to be forced into a lifestyle they don't want?! It doesn't make sense!

Page 41, Rural Character Task Force Policies - *"The Suburban Cities Association and the City of Seattle have recommended revisions to the Rural Character Task Force Policies."* Talk about letting the fox in the hen house - these two groups have totally different agendas than people living in rural areas. It would be totally unfair if the King County Metro Council were to adopt any of these revisions without taking it back to all the citizens who participated in the many public meetings that were held.

WATER SUPPLY

C0-16 will result in extreme hardship on rural residents, as will SRU-14. RU-14 as recommended by the Rural Character Task should be adopted.

POLICE/FIRE/EMERGENCY

The report fails to address law enforcement costs for the urban centers' high density. Page 190 alleges that, *"Previous research indicates no strong conclusions can be drawn."* Look at the inner city of virtually every major city in the country being terrorized by gangs and drug dealers. I have lived in the suburbs for 30+ years with no problems. I had occasion this past year to stay in a Seattle apartment complex for a few months. In four month's time my car was broken into once and broken into and stolen the second time.

TRANSPORTATION

While I could write several pages on this subject, I'll say very little, as I believe it will become very obvious to the general public soon that the current GMPC policies have very little to do with good planning and improvement of the Northwest lifestyle, but rather is a strategy orchestrated by the City of Seattle and a few well-intentioned but unqualified, misinformed, naive suburban city politicians who are justifying a very expensive mass transit project that will never benefit more than 15% of King County's population as the "cure all" to growth management.

When business and the public understand the true meaning of T.D.M. (as the SEIS states on page 75 TDM, *"Encompass any strategy aimed at reducing roadway demand"*) there's a

strong possibility they'll make TDM a real success by voting with their feet and moving to another area.

What are the real impacts if RTP does not go forward?

TR-3 The SEIS refers to centers based on high capacity transit, yet there is no analysis of the impacts of the failure to construct a regional transit plan.

Page 81, Bicycle - Improvements would include "standardized inclusion of space (bike lane, shoulder, wide curb lane) on arterials, provision of direct bypasses at barriers such as bridges, ramped interchanges, etc." What are the costs associated with this? Will it be cost-effective? Who pays? What percentage of the public will bicycle? Will they do it twelve months a year or only in dry weather?

TELECOMMUNICATIONS

TR-28 Page 81, per "Schneider's 1988 Report" - "Many jobs can be easily decentralized in the U.S. About 39% of the work force could be potential telecommuters." This is another strong argument against being successful in "regulating businesses and households into cramped in-city high-rise living, versus the typical Northwest lifestyle that attracted people here in the first place. It also raises the question of timing and costs. GMPC policies say we should spend billions of dollars on rail/transit, which will benefit at best 15% of the population (according to best results of other cities), while technology is at our doorstep now to handle (benefit) more than twice as many people.

SCHOOLS

IS-4 What are the effects? SEIS does not attempt to conduct an in-depth analysis.

UTILITIES

Costs need to be quantified.

CENTERS

LA-6 If the University District exemplifies urban center densities - 50 jobs per acre - would Boeing, Microsoft or other big players locate there?

SEIS

LA-1(e)
LA-6 Does not address redevelopment assumptions. It does not address adverse economic impacts associated with compact urban centers.

AFFORDABLE HOUSING

HO-9 "Urban Centers will necessitate large public subsidies." What are they? This needs to be looked at. The impact on taxpayers will be quite significant. How do these impacts effect the cost of housing and availability of affordable housing in the overall housing market?

GENERAL COMMENTS

This SEIS ignores important studies and information that is available and relevant to the analysis.

- 1993 Seattle Water Supply Plan - A 1985 plan is used;
- FIS/ED Task Force case studies - pointed out several negative conclusions that are ignored;
- IS-8 • Washington Natural Gas presented an in-depth nation-wide study on "Cost Effective Density" to the FIS/ED. The study totally disagrees with Utilities, page 151, which states, "The more concentrated development in urban areas ... the more efficient cost effective the utility service; and Page 152, where it concludes "The 8 and 14 center alternatives are said to have the greatest potential for energy efficiency and positive impact on delivery of services."
- IS-4

SEIS fails to address important questions:

- IS-4 • What are the cost and feasibility of making urban centers competitive with the marketplace so that people will choose to live there?
- How do crime and human service problems in dense urban areas affect the ability to create quality urban neighborhoods?
- What are the costs of developing needed new water sources and replacing very old sanitary and storm sewer lines in Seattle?
- LA-13 • What are the cost impacts and environmental problems with redeveloping industrial lands?
- LA-9 • If the centers don't build out in twenty years, how viable are they? Where will the growth go? At what effect to the environment?
- LA-10

CLOSING STATEMENT

I cannot understand how any responsible elected official can make such important decisions that will affect the entire population of King County for years to come, based on the vague, inaccurate information that is covered by this current SEIS. Sure, it puts the C.Y.A. disclaimers in saying we can not determine this or that at this time, etc. If that's the case, then take the time to get the information before putting into law regulations that will change the lifestyle and effect the financial well-being of virtually every citizen in King County.

DRAFT EIS
February 25, 1994
Page 8

I thank you for the opportunity to comment.

Sincerely,


Jack L. McIntosh

JL.M:ss

p.s. As I was putting these final comments together I noted a front page article in the Business Journal, February 11th issue entitled, "Retail Space Requirement puts Apartments into Hotel Business," by James Epes. This article deals with Seattle's requirement for "mixed use" commercial development on first floor and apartments above. A current study looked at 51 projects containing 1,445 apartments and 255,000 square feet of commercial space built since 1988 under the City's mixed use code, which shows 47% of all commercial space vacant. At Interbay, three projects have a 66% vacancy rate (several projects have already failed and gone back to the lenders). Good ideas may be for Europe or other areas but not accepted here in the Northwest. There's a correlation here. Well-meaning planners and politicians are totally missing the market - forcing urban center regulation without a clue as to its effects in the marketplace. PLEASE, PLEASE, PLEASE get all the numbers, THEN do a market feasibility before you make law. You're playing with the future of the city/county I love.

Dear Jane McJannet,

2/25

My main concern with any of the proposals is that mixed use stay mixed. It is not fair to be forced to make a substitution because of development coming into mixed use areas.

My other thought is that while we must plan for growth, we must also realize that unlimited growth is not possible & we must write the development regulations against the problems & concerns of the population. Suburban planning is a different matter.

African-American Agenda

1326 5th Ave. Suite 808 Seattle WA 98101
(206) 624-1256 Fax:(206) 624-7135

February 25, 1994

Ms. Lisa Majdiak
Growth Management Project Supervisor
Planning and Community Development Division
Parks, Planning and Resources Department
Smith Tower Building
506 Second Avenue, Room 707
Seattle, WA 98104

RE: Comments on Draft Supplemental Environmental Impact Statement
for the Countywide Planning Policies

Dear Miss Majdiak:

Thank you for the opportunity to respond to the SEIS.

The Growth Management Act was enacted in response to five years of unprecedented growth in Central Puget Sound, as well as the defeat of Initiative 547. In response, King County, and its cities, have enacted one of the most comprehensive set of Countywide Planning Policies in the nation.

At the time the GMA was adopted, the Seattle Central Area was not suffering from too much growth and too much prosperity. Affluent suburbs bristled at too much growth and created the political pressure for tough *Countywide Planning Policies* and a tight urban growth boundary. Now as an unintentional result, these policies may force more instability and density in inner-city neighborhoods than is desired by existing residents.

We have several issues of concern that need to be more adequately discussed in the SEIS: (1) housing affordability; (2) gentrification; (3) housing mix; (4) neighborhood preservation; and (5) moratorium on manufacturing, business and office park land.

We feel that the tough policies and very tight urban growth boundary decisions may have serious and negative impacts on Communities of Color and people with lower or fixed incomes. As the housing supply is artificially constrained, housing prices will go up. We will also see more affluent couples returning to the inner-city looking for affordable, fixer-upper homes, displacing lower income owners and/or renters from affordable housing units. This process is what is known as "gentrification."

IN-5
HO-12 We do not feel that the SEIS adequately discusses the potential social and economic problems resulting from higher home prices in general and those impacts resulting from the gentrification and densification of currently "affordable" neighborhoods.

As housing becomes scarce and more expensive in the inner-city, those who can least afford long automobile commutes are forced to commute the furthest. The SEIS does not fully address the transportation impacts that result from the displacement created by gentrification.

LA-9 Further the SEIS does not adequately address the adverse impacts of forced densification on the character of established neighborhoods. The Growth Management Act clearly establishes "neighborhood preservation" as a major goal, and the proposed policies appear to force de-stabilization instead of preservation. Reinvestment in existing communities, including maximizing infill, is vastly different than forced densification of already-built-out neighborhoods. The SEIS should more fully discuss the impacts on neighborhood preservation.

HO-4 Relatively new environmental and land use standards, such as traffic mitigation fees, sensitive areas ordinances, school mitigation fees, wetlands set-asides, open space dedications, have significantly added to the price of an average, new single-family home in King County. A middle-lower income family is effectively priced out of the market. Restrictions on the availability of lumber have also increased the prices of homes.

The new *Countywide Planning Policies* and tight urban growth boundary will limit the supply of vacant land for new housing as well as the numbers of units targeted to be built over the next 20 years. The SEIS fails to adequately analyze the "complete housing cost" impacts of the new *Countywide Planning Policies*, nor the cumulative impacts of all the regulatory pressures driving up housing prices. It is a well documented fact that the most valuable asset a family has is their home. It is the cornerstone for developing and passing on wealth.

This becomes exponentially crucial in Communities of Color. If these hard working citizens are to ever achieve economic parity, it will most like start with the purchase of real estate and/or small business development. Affordable housing advocates recently issued a report, *The Story of Benson Glen*, which details some of these impacts within King County.

HO-12 It is projected that the current King County *Countywide Planning Policies* will result in a surplus of expensive homes on 5- and 10-acre lots and luxury high-rise penthouse condominiums. While many may find this lifestyle attractive, only the wealthy can afford it. People of moderate means, including most people of color, who cannot afford these higher-priced housing products, risk being forced to remain renters. The SEIS should more critically analyze the housing mix created by the new policies in relation to actual and projected market demand, particularly the demand for more affordable types of housing.

The *Countywide Planning Policies* fix the amount of manufacturing sites at the current level, while not curbing the re-zoning of industrial land for other uses. The expansion of business and office parks is prohibited by the interim policies. These policies will curb future job growth in King County. The unemployed and underemployed who desperately want jobs like these will remain so as these jobs never materialize. This is exactly the opposite of what people of color seek.

IN-5 We do not seek welfare. We seek the opportunity to work and prosper like all citizens. Our optimism for increased economic opportunity is dimmed by the "no more manufacturing land" policy. We feel the SEIS fails to adequately assess the adverse economic and social impacts resulting from such policies. In fact, we can find no other local government that has taken the unprecedented step of placing a *de facto* moratorium on its manufacturing land supply. There must be some way to merge the need to manage growth with the need for job creation for People of Color.

We believe in protecting the environment, which has been accomplished by adopting a Sensitive Areas Ordinance. This protects critical areas, as well as other environmental protections. The debate over growth management policies is largely about what to do with "buildable" land that is not environmentally sensitive. The SEIS does not, in our view, sufficiently analyze the probable adverse consequences, resulting from the interim policies, to those citizens of Color or those who are moderate-lower incomes. We urge that the final EIS address these issues in much greater detail.

Thank you for the opportunity to comment.

Sincerely,

Nate Miles
Nate Miles - Co-Chair

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FEB 15 1994

February 14, 1994

Mr. Jim Reid, Manager
Planning and Community Dev. Div.
Parks, Planning and Resources Department
707 Smith Tower Building
Seattle, WA 98104



Pacific
Properties
Incorporated

Property Development
Construction

Re: Draft Supplemental Environmental Impact Statement (SEIS)
for the Countywide Planning Policies (CPP's)

Subject: A-3 Maps, Exhibit A of the Appendices

Ref.: Trossachs Group Property,
Brighton's Landing Property, and
Belvedere Park Property

Dear Mr. Reid:

IN-9

LA-27

Following up on our conversation, we understand that the Draft SEIS analysis includes those parcels added to the Urban Growth Area (UGA) by the adoption of the East Sammamish Community Plan Update and Area Zoning Review in May 1993 which includes the parcel known as the "Trossachs Property." However, this parcel was not included in the UGA depicted in the A-3 maps of Exhibit A of the Draft SEIS Appendices.

Other properties on the Plateau are similarly situated, including the parcels known as Beaver Dam and Aldarra.

Ordinance No. 10450, adopted on July 6, 1992, clearly intended (paragraph 7 on page 2) that those areas added by the East Sammamish Community Plan Update (ESCP) process be evaluated in the Phase II DSEIS process.

Further, Ordinance No. 11110 adopted on November 22, 1993, designated an interim UGA pursuant to the State of Washington Growth Management Act (GMA). This Ordinance also directed staff to recommend to the GMPC amendments to the Countywide Planning Policies which would incorporate the UGA established in the 1993 ESCP. The interim UGA established by Ordinance 11110 included those areas designated Urban in the 1993 ESCP.

The DSEIS itself (page 2, Introduction) acknowledges that these parcels were analyzed in the DSEIS, but *not* included in the DSEIS A-3 maps:

14410 Bel-Red Road
Bellevue, WA 98007
Phone (206) 644-2310
FAX (206) 643-3475

Mr. Jim Reid
Parks, Planning and Resources Dept.
February 14, 1994
Page 2

A variation to the East Sammamish 1992 UGA was also analyzed. *This area was not mapped but rather is a policy stating that the 1993 East Sammamish Plan urban/rural boundary may be revised pending a ground water aquifer study. For purposes of countywide analysis, the data for this line was based upon the 1993 East Sammamish Plan urban/rural line adopted by the King County Council and the East Sammamish Plan Final Environmental Impact Statement (FEIS).* The specific geographic location of the UGA's will not be officially designated until action is taken on the update of the King County Comprehensive Plan. This analysis provided in this SEIS for the CPP's is limited to discussion of the impacts of the designation on a countywide policy basis only. *[emphasis added]*

We concur that the DSEIS should analyze those parcels added by the East Sammamish Community Plan Update process. However, we feel that the decision makers who will use this document will be confused by the fact that the analysis and the A-3 maps do not match. What purpose do the maps serve if they do not match the area studied in the DSEIS analysis?

To avoid confusion, we respectfully request that the A-3 maps be corrected to include the area actually analyzed, including our three parcels in the East Sammamish Community Planning Area

Thank you for your attention to this matter.

Sincerely,



Michael E. Miller, P.E.
President

MM/ash

cc: Lisa Majdiak
Contact Person, CPP's SEIS Comments

Hedges & Roth Engineering, Inc.

ENGINEERS
PLANNERS
SURVEYORS
AM/FM/GIS

February 28, 1994

King County Planning and Community Development Division
King County Parks, Planning and Resource Department
707 Smith Tower Building
506 Second Avenue
Seattle, WA 98104
FAX: 296-0229

Attn: Jim Reid, Manager

Re: Draft Supplemental Environmental Impact Statement
for the Countywide Planning Policies

Dear Mr. Reid:

Thank you for the opportunity to comment on this draft SEIS. We will be mailing a hardcopy of our comments to you under separate cover.

February 23, 1993, Hedges & Roth Engineering submitted a letter supporting the mandates of the Growth Management Act and recommending several issues we felt could be of great importance and should be included in the analysis for the draft SEIS. The majority of our concerns appear to have been left to a future analysis. Again, we feel it is imperative, early on in this process, to have a broad accounting of the general areas of concern the region may have under the different alternatives. The disadvantage to not looking at the broader infrastructure consequences may be a skewed view of the regional environmental and fiscal costs for the future. We request that our concerns of February 1993 be included in this Supplemental Environmental Impact Statement. We have included a copy of that letter with these comments.

IN-4
It is our understanding the fiscal analysis is "under separate cover" and is to be used in conjunction with this environmental review. It is impossible to properly evaluate only half of the puzzle at a time. In order for elected officials and the public to properly evaluate the regional picture we need that additional information. We request that additional comments be accepted regarding this draft SEIS pending the fiscal report.

The draft SEIS and its summary have raised more questions than answers. Perhaps that is the intent. Throughout the document are many "statements of fact". However, the appendix does not provide us with the data to develop a similar conclusion.

Reid - draft SEIS
February 28, 1994
Page 2

IN-2
In addition, it is unclear as to why or if the analysis for this document consistently used the most recent information available. Two specific documents come to mind. The first being the, King County Comprehensive Plan: First Five Years, which was adopted by King County Ordinance 10237, January 13, 1992. Although the draft SEIS lists several of the amended King County Comprehensive Plan policies in the appendix it is very difficult to determine if those policies and land use designations were used in the analysis or if the "1985 King County Comprehensive Plan", which was cited throughout the document, was truly the base upon which the analysis was made. There has been, of course, considerable changes made to the "1985" document with several community plan updates and/or amendments as well as the King County Comprehensive Plan: First Five Years amendment to the Plan.

IS-8
The second area of documentation we are concerned with, is the fact that the draft SEIS did not use the most recent version of the Seattle Water Supply Plan, which was adopted by the City of Seattle in September 1993. There are several instances where documents used were "draft" in nature, therefore we assume there was some greater reason for not at least using Seattle's draft plan, which was released quite a while ago prior to its adoption 5 months ago.

Within the Water Supply section it is clear that the information used was not current. It is also very important to note that it is imperative we all understand that by our conservation programs we have simply allowed us the time required to develop additional sources. This can not be put off to the future. There are several avenues which are being evaluated: the Pipeline 5 intertie that Seattle and Tacoma have worked on for years, a possible Everett intertie, potential for expansion of the Tolt River system as well as potential for an underground water source in the Snoqualmie Valley.

Within the "Sewer/Septic" section of the document, on page 141, the draft SEIS states the following:

IS-5
"...The Pre-Countywide Planning Policies Alternative has the most dispersed growth pattern which will demand delivery of wastewater services in areas that are least capable of providing them." and "...The amount of growth forecast will result in adverse impacts on the delivery of sewer/septic services."...and "Analysis of the impacts of the alternatives on existing sewer/septic systems was conducted with respect to the allocation of growth and the policy sets associated with each of the alternatives."

Reid - draft SEIS
February 28, 1994
Page 3

All three of these statements raise questions such as what specific analysis was made? Where is this data, so the public may review it? Isn't this in direct conflict with the statement found on page 3 of the document:

"...The policies do not provide adequate specificity that would allow a quantitative analysis of the potential impacts of future growth under each alternative...specific baseline information, such as location of infrastructure or capacity of infrastructure is not available for use in this SEIS...After it is developed by the individual jurisdictions it can be aggregated for a countywide analysis."

It would be very helpful to review the technical data and analysis which was used to make the above determinations.

As sewer district comprehensive plans are functional plans which conform to the King County Comprehensive Plan together with community plans it stands to reason that previously designated urban areas either have sewers or the underlying capital facility plans in effect to implement the those adopted plans. In addition, it is important to note that in most urban areas sewer service has in fact been planned and in vast areas has been built.

IS-32
Regarding the mitigation measures for both water and sewer there has been no mention of environmental consequences of retrofitting, which may be required. In addition, there is no mention in either section regarding the transferring of conveyance systems between jurisdictions nor the need to purchase capacity which has been built into existing systems (and may have existing bonds).

LA-20
In addition to the above concerns it appears as though consideration has not been taken regarding the many regulations which have been enacted since the 1985 Plan was first adopted which provide firm guidance and regulations regarding water and sewer service as well as development within unincorporated King County. Specifically, sewers ARE NOT allowed into the rural and resource areas, unless there is clear direction and approval from the Council. Additionally, throughout the document there are indications of things that could or would happen under the different scenarios, that we know would not occur due to the Sensitive Areas Ordinance or the recently updated zoning code. Please adjust the document to reflect current regulations.

Reid - draft SEIS
February 28, 1994
Page 4

IS-33

NS-10

Within the Water Quality section inadequate attention was given to the fact that the Department of Ecology has five study areas within the County. Quite a bit of information regarding the location of aquifers as well as guidelines are being developed. The document gives the false impression that our drinking water is very shallow, 25 - 50 feet. In fact, most municipal wells are in excess of 200 feet in depth with only a few as shallow as 65 or 85 feet. Additional information in both the Water Quality and Water chapters should emphasize that almost 25% of the URBAN area of the County receives its drinking water from groundwater sources. Of course the percentage for the rural area is much greater.

Thank you again for the opportunity to make comments on the draft SEIS. We look forward to hearing back from you on these specific concerns. If you would like further clarification please do not hesitate to contact me at 869-9448.

Very truly yours,

HEDGES & ROTH ENGINEERING, INC.
Bellevue Office

Helen E. Nilon

h:\home\helen\seis.228

cc: Councilmember Kent Pullen, Chair, Metropolitan King County Council
Gary Locke, King County Executive and Chair, Growth Management Planning Council
Councilmember Jane Hague, Metropolitan King County Council
Lisa Majdiak, Growth Management Project Supervisor
John Roth, Hedges & Roth Engineering, Inc.

Hedges
& Roth Engineering, Inc.

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PCDD

Feb. 25, 1994
41502 SE Reinig Rd.,
Snoqualmie, Wa.. 98065

Lisa Majdiak
King County Planning and Community Development Division
707 Smith Tower Building,
506 2nd Ave., 58104

Dear Ms. Majdiak,

I am writing to support the DSEIS for the County's Countywide Planning Policies for several reasons.

I believe that the Urban Centers concept will best meet a multiplicity of goals, including

- maintaining viable agricultural and resource land within the county;
- maintaining a rural lifestyle opportunity within the county, with the diversity, open space and recreational opportunities this provides;
- encouraging efficient transportation systems;
- enhancing the availability of creatively achieved affordable housing;
- protecting and improving environmental quality.

I support the present urban/rural line concept as a planning tool that will best provide the diversity and environmental quality we value in the Puget Sound region.

Moreover, I support this planning process itself, and urge you to adhere, as planned, to the July time schedule.

It is important to uphold the integrity of the planning process to provide predictability and resolution to growth issues. I have followed the county's planning process since the involvement with the Snoqualmie Valley Community Plan 10 years ago, and find it amazing that I must still attend meetings to defend this plan. Over these years I have watched some attorneys build their careers on circumvention and dilution of the county's planning process in my community.

My community remains polarized over growth issues because there is no resolution to the planning process.

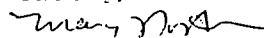
My family and community would be better served if my energies, and that of many other people over these 10 years had been spent on our children's schools, open space and affordable housing, rather than following this planning process.

There is no point expending the time, money and energy involved in the planning process if the plans are never implemented, or are diluted beyond recognition by continued attack over an endlessly prolonged process.

Please follow the proscribed timeline for this planning process to provide some predictability and stability for my community. Please support the Urban Centers concept for the diversity and environmental quality we want for our region.

Thank you for your ongoing efforts!

Sincerely,


Mary Norton

02/25/94 11:22 FAX 206 2980198
From: Mike Nykreim To: Jane Hague

KING CO. COUNCIL

Date: 2/25/94 Time: 00:30:20

001

Page 1 of 3

Facsimile Cover Sheet

To: Chris Vance, Jane Hague or
Jeanne Keenan, Jim Reid

Company: Growth Management Planning
Commission

Phone:

Fax:

From: Mike Nykreim

Company:

Phone: (206) 827-2234

Fax: 828-8851

Date: 02/25/94

Pages including this
cover page:

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FEB 28 1994

PCDD

Comments:

To borrow a phrase from Bellevue City Councilman, Ron Smith:

"Do we want Manhattan or Mayberry?"

Why has Growth Management become an excuse for planning for Manhattan when what we said we wanted is Mayberry?

I reviewed the transcript from Feb. 9, Public Comments on DSEIS and found that many people strayed from the point. SEPA was never intended in telling us specifically how we must live. Its intent in 1972 was to outline the impact of our choices. Only the Planners in their concern to protect the environment forgot some social and economic realities. They feel that the only way to protect the environment is to crowd people into "Urban Centers". Fortunately, through the public hearings process can we see that this is not the balance of environment and housing that the public seeks. This is not what SEPA demands nor is this what GMA is about.

The Urban Center concept is a good idea. It gives people a sense of place, and knowing when they are "there". For some it will be within walking or biking distance, but most of us will drive there. It has open space and some dense living. It definitely is a part of our neighborhoods. Finally, we have planned for enough communities in advance to not have a shortage of "housing to all economic segments".

What Urban Centers are not is what GMPC has been portraying. It is not the tall gross buildings that have been outlined. It does not regulate our children to a grim lifestyle like Hong Kong or Boston or San Francisco. It doesn't go unnoticed that all of the speakers who alluded to those places do not choose to live in those places today. It is of further note that most of the people in testimony who promote high density Urban Centers currently live far away from the centers to which they would relegate our children.

The Urban Center could be "Mayberry." But, only if we listen to people and not planners. The Urban center that is desirable will be a mix of multi and single family homes. It will have businesses, parks and transportation within walking, biking, or driving distance. Seattle Planning Department Doc.

HO-6
93 Residential Preference Survey clearly demonstrates that 2/3's of the people surveyed prefer single family homes. It also states that more than 4/5's of the people surveyed with children will only live in a single family home. With these goals clearly stated, why is anyone talking High Density Urban Centers?

GMA discusses the use of existing infrastructure to accommodate growth. This doesn't mean tear down our neighborhoods to start over. The economics won't work. Let alone how we feel about losing our neighborhoods. You can tear down a house and put up another apartment complex and eventually you find that the 8" water main and 12" sanitary sewer just won't take anymore. We will end up with crummy apartments with backed up sewers. Not anyone's vision of a great community.

Sustainable development and communities are a real concern. The declaration that "new development and communities don't pay their own way" is a false statement. The City of Kirkland's Capital Facilities Plan demonstrated what our infrastructure is worth per capita. When we further studied what new homes and businesses pay in Sales Tax, Excise Tax, Fees, and permits we find that not only does new development offset the infrastructure impacts, but provides a surplus in Tax Revenues. These tax revenue surpluses are then siphoned off to other social needs rather than development infrastructure. When was the last time you ever saw a bond issue for the Department of Welfare?

The question of offsetting impacts of new construction is clearly demonstrated, not a deficiency in taxes levied, but rather not enough return of taxes collected from new developments. Fortunately GMA demands that taxes and fees collected must be taken into consideration prior to collecting impact fees. This is an issue that should have encouraging results when the State will be demanded to return its tax revenues to maintain concurrence. This is all in GMA. It is the law. All you have to do is demand it.

Urban decay is cited as an essential to be avoided. No one could possibly disagree. But the problem of "white flight" (a racist term) will never be mitigated by any planner. School busing is the sole cause of migration from cities. People of all colors don't want their kids bused. Those with resources will not stand for it. My mother and grandmother attended the same High School (Roosevelt) as I. My children will not.

Are we running out of land? I have climbed all the tallest mountains in this state, some several times. Once from the top of Baker we could see all the way beyond Adams. Seattle was a speck of dust amongst the backdrop of the majestic Olympics. It is hysteria to declare we will soon hit the top of the Cascades. Herbert Research notes in a Spring 93 study that the first 150 years of settlement of this state has only occupied 3% of this state's land for commerce and homes. Will our state's population grow from 5 million to 50 million? Thus occupy 30% instead of 3% of our land? Maybe in 600 years. In the meantime do we plan for the future generations Mayberry or Manhattan?

Thanks for your time on this effort. I am sure our children will thank you too!



Planning Department (206) 455-6880 • FAX (206) 637-7015 • TDD (206) 637-5263
Post Office Box 90012 • Bellevue, Washington • 98009-9012

February 28, 1994

Jim Reid, Manager
Planning and Community Development Division
Parks, Planning and Resources Department
707 Smith Tower Building, 506 2nd Avenue
Seattle, WA 98104

Re: DSEIS for the Countywide Planning Policies

Dear Mr. Reid,

The City of Bellevue staff has had the opportunity to review the Draft Supplemental Environmental Impact Statement (DSEIS) for the proposed amendments to the Countywide Planning Policies. We are aware of the comments offered by the Suburban Cities Association Caucus to the GMPC and are in support of those comments. Therefore this letter will not reiterate those comments.

These additional comments are offered:

- LA-49 1. Page 36 - Under the "8 Centers" alternative there is the statement that "new growth is targeted first to these centers, and next to other urbanized areas with available infrastructure capacity." CPP policy LU-16 clearly states: "Within the Urban Growth Area, growth should be directed as follows: a) first, to centers and urbanized areas with existing infrastructure capacity; b) second, ..." The draft should be revised to reflect this policy, wherever this oversight may have occurred.
- LA-40 2. Page 60, second paragraph - Elsewhere in the document the figure of 215,000 dwelling units is used instead of 190,000. The difference should either be explained or corrected.
- LA-41 3. In general the City of Bellevue believes that the Bellevue Downtown is an urban center and meets the criteria specified in the Countywide Planning Policies. While the "14" and "8 Centers" alternative recognize this, it would be appropriate that all the alternatives do.

4. Throughout the document the issue of a differentiation between urban and rural service levels needs to be fully discussed.
5. The discussion of aquifers needs to be expanded. While the aquifers are discussed in regards to drinking water, there is no discussion of aquifers in relation to other environmental values such as maintaining base flows in streams.

NS-10

Should you have any questions regarding these comments please contact me at 455-6880.

Sincerely,



Robert G. Odle
Principal Planner

cc: Mayor Davidson and Councilmembers
Phil Kushlan
Bruce Freeland
Karen Reed
Lloyd Warren
Nancy Hanson
Malinda McFadden



SEATTLE-KING COUNTY ASSOCIATION OF REALTORS®

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February 26, 1994

Ms. Lisa Majdiak
Growth Management Project Supervisor
Planning and Community Development Division
707 Smith Tower
506 Second Ave.
Seattle, WA 98104

RECEIVED

FEB 28 1994

PCDD

Dear Ms. Majdiak:

The Seattle-King County Association of REALTORS has reviewed the Draft Supplemental Environmental Impact Statement for the Countywide Planning Policies (DSEIS). Our Association represents 5,000 REALTORS, 10,000 members of the Puget Sound Multiple Listing Association, and approximately 500 "affiliate" organizations such as banks and title companies who work in the real estate industry. Our organization is interested in affordable housing, economic vitality, and quality of life, and will support legislation that promotes these core values.

There are the touchstones against which we have reviewed the SEIS. With this in mind, we offer the following comments:

1. The final SEIS must address shortcomings in the land capacity analysis, and the effect of these shortcomings on the success or failure of the CPP's:

LA-1

The Countywide Planning Policies (CPP's) and the SEIS analysis of the alternatives are based on a land capacity study performed by the Data Resources Technical Forum (DRTF), a consortium of City and County planning department representatives. The DRTF attempted to measure land capacity in King County and its Cities by measuring vacant land and redevelopment parcels using assumptions that are questionable. These assumptions and the problems associated with them are pointed out below:

LA-1(a)

1. Maximum zoned yield. The DRTF assumed, for purposes of measurement that every parcel identified would be developed to its maximum zoning. Although this may be useful for counting purposes, it is not an accurate way to measure true capacity, nor is it an adequate basis upon which to draft detailed land use policies such as the CPP's. A discount factor recognizing that very few, if any, land parcels get developed to 100% of their zoned potential, must be included in order to ascertain true capacity. This was

recognized by the Fis/Ed Committee of the Growth Management Planning Council (GMPC) in their "case studies". It is also recognized in the very first "bullet point" of the entire document (SEIS p. 14), which calls for a "vigorous monitoring effort to track land development and capacity" because of the "uncertainties and possible errors in the data". This is clearly one of those uncertainties. *The Final SEIS must identify the percentage of zoned development potential that is unavailable for whatever reason and analyze the effects of this on land capacity, and, in turn, on the success or failure of the CPP's.*

2. Developability of vacant parcels. The DRTF and the SEIS assumes that every vacant parcel identified in the capacity analysis is available for development. No effort was made to calculate the percentage of vacant parcels that may be undevelopable because they may be undersized, undesirable, or unbuildable because of drainage problems and the like. *The Final SEIS must address the effect of this issue on land capacity.*

3. Assumptions regarding redevelopment. The DRTF, in most instances, identified parcels that would be redeveloped by counting those parcels where the improvement value was less than 50% of the total parcel value. If this "improvement ratio" exceeded 50%, the parcel was considered redevelopable within 20 years. This analysis ignores waterfront, view and acreage parcels where the value is in the land. In many instances, these parcels will not be redeveloped within 20 years. *The final SEIS must identify the effect of this factor on land capacity.*

4. Concurrency. To date, the DRTF capacity numbers have not been adjusted to address the effect of the GMA and CPP concurrency requirement on land availability. If a parcel cannot meet this requirement, it is not available for development or redevelopment, and thus is not countable for purposes of measuring capacity. Although this is one of the most difficult exercises associated with the GMA, it is also one of the most important. *The final SEIS must address the effect of the concurrency requirement on land capacity.*

5. Location of high-density zoning. There is no indication that the zoned capacity that supposedly exists is located near where it needs to be to further the goals of the CPP. (SEIS p. 32) *The final SEIS must analyze whether or not the zoned capacity is located properly.*

6. NIMBY factor. The NIMBY factor in the past has reduced development capacity substantially in most instances, especially in urban areas. Given that the GMA and the CPP's call for "early and continuous public participation", it does not appear that this factor will be limited. *The final SEIS must analyze the effect of the NIMBY syndrome on true land capacity.*

7. Internally inconsistent policies. The SEIS has assumed 100% zoned yield on every parcel in King County. However, specific CPP Policies limit capacity. For example, Policy FW-23 calls for "urban and rural open space corridors". Another example is Policy LU-33, (e), which calls for "historic preservation and adaptive reuse of historic places". Yet another example is Policy AH-3, which calls for jurisdictions to "develop strategies to preserve existing low income housing ...". These Policies, all well-intended, operate to reduce capacity in Urban Areas. *The effect of these (and other) Policies on land capacity must be addressed in the final SEIS.*

2. The final SEIS must address the effect of the adjusted land capacity numbers on the CPP's:

The CPP's were written in the Spring and Summer of 1992, based on the preliminary land capacity figures prepared by the DRTF. Our Association first commented on these figures on February 13, 1992, noting that they appeared to be artificially high. Since that time, the capacity numbers have been adjusted downward to reflect factors identified by the ourselves and the DRTF that reduced capacity. The adjustments have been substantial in many instances. Seattle's original residential capacity of 139,797 units was subsequently adjusted to the current number of 95,941, a difference of 43,856 units. Seattle's commercial capacity was adjusted from 281,197,411 square feet of building space to 147,303, 671 square feet, a difference of 133,893,740. *The CPP's however, were drafted based on the older and higher numbers. Although the DSEIS assumes that there is sufficient capacity using the newer capacity numbers, it is silent on the fact that the CPP's were written using the older numbers. Put another way, the DSEIS does not address the fact that the CPP's were drafted based on incomplete and inaccurate information related to land capacity. The final SEIS must address this concern.*

In addition, the DRTF also discussed in detail the concept of a using a "6-year rolling land supply" connected with each jurisdiction's Capital Improvement Program as a way to ensure adequate land capacity. This concept provides a possible answer to the concurrency dilemma. However, the DSEIS only mentions it in passing. *More discussion of this possible solution is necessary in the final SEIS.*

3. The SEIS does not adequately discuss market acceptance of the CPP's and/or the consequences of non-acceptance:

According to a June, 1992 survey by FNMA, 80% of all Americans identified the single family home with a yard as the preferred housing choice. In addition, the survey found that by a 4 - 1 margin, Americans would rather own a home some distance from work than rent within easy commuting distance. In a related and more detailed survey by the Seattle Planning Department, 63% of the public identified a single family house as their preferred housing choice, no matter how attractive "Urban Villages" were made, and, no matter how successfully school and crime problems were addressed in the urban areas.

From these two surveys, it can be concluded that between 2/3 and 3/4 of a population prefers a single family home, and that they will go to extreme lengths to realize this dream. In the face of this, however, the CPP's propose that 61% of all new construction will be multifamily (SEIS p. 32.)

Thus, somewhere from 24 to 41% of the public will ultimately be unable to live in single family housing in King County if the CPP's proceed as drafted. Given that by a 4 - 1 margin, they are likely to commute some distance in order to own a home, a substantial portion is likely to refuse to accept the CPP's land use pattern.

The consequence of this is that some percentage of King County's workforce will choose to live farther out, commuting longer distances to work, making traffic worse and exacerbating air and water quality problems. This is exactly what the GMA is designed to stop - urban sprawl.

LA-11(c) We acknowledge that markets may change over time, and we acknowledge that demographics will also change over time. However, in the short term, the CPP's represent a radical change in the housing mix, one that, from a public acceptance standpoint, is questionable at best.

Ho-2 This is obviously an important issue. However, the SEIS only addresses market issues in the context of housing affordability, concluding that "market forces have a significantly greater impact on housing costs and affordability than housing policies", and also that some household growth may be diverted to less costly parts of King County or other Counties. (SEIS p. 59 and 66).

The final SEIS must expand its review of market issues to include review of the effects of market acceptance or non-acceptance on the success or failure of the CPP's.

4. The SEIS misestimates the amount of growth that will occur in the Centers:

LA-7 According to the SEIS, 40% of King County's future growth is to occur in the Urban Centers. However, recently-released "Population and Employment Targets" show that only 27% of this growth is to occur in the Centers. This is a substantial difference. *The final SEIS must include the correct population and employment allocations for the Centers.*

5. Neither the CPP's nor the SEIS contain a fiscal analysis as required by State law:

IN-4 RCW 36.70A.210 (3)(h) requires that Countywide Planning Policies contain "an analysis of the fiscal impact". In the Snoqualmie decision, the Growth Planning Hearing Board for Central Puget Sound recently ruled that the "fiscal analysis" contained in Phase I of the CPP's is inadequate. The DSEIS admits that it doesn't contain a fiscal analysis (SEIS p.3), but that one is being prepared under separate cover. Apparently, no analysis of this separate fiscal analysis is contemplated for the final SEIS.

The final SEIS must analyze an appropriate fiscal analysis. Under state law as interpreted by the hearings Board, this fiscal analysis is an essential part of the CPP's. Put another way, a set of CPP's is incomplete without one. If the final SEIS does not analyze the fiscal impact analysis, it does not analyze the complete set of CPP's, which would mean that is not in compliance with either SEPA or GMA.

The final SEIS must therefore contain an accurate analysis of a properly conducted fiscal analysis.

6. The assumption that increased density means increased neighborhood harmony needs further analysis:

On page 24 of the Draft SEIS, it is noted that one of the positive impacts of compact future development is an:

- "Enhanced sense of shared public purpose and commitment to neighborhood values through closer community ties. This impact can be expected to follow from a commitment to higher densities when supported by good urban design and a well-conceived program of public incentives and education".

15-9 This phrase implies that increased density will foster more neighborhood harmony. We feel that this assertion needs further analysis. It is our understanding that a recent Seattle Police Department survey recently found that a resident of a multifamily unit is between 2.5 and 3 times more likely to be the victim of a violent crime than a resident of a single family house. In addition, we understand that overall crime rates are higher in denser neighborhoods than in predominately single family neighborhoods. We therefore question the veracity of this statement.

The final SEIS must contain a more detailed analysis of human interactions in denser settings, including a discussion on the effect of density on crime rates. It also must include an analysis of the population's likely responses to higher crime rates, especially if the Centers contain densities that promote higher crime rates.

7. The CPP's blanket assertions that higher density means reduced infrastructure costs need further analysis:

LA-6 Throughout the CPP's, it is asserted that higher densities means reduced infrastructure costs. This may not always be the case. We are aware of an instance in which it cost over \$800,000 to increase the size of a water main under a 30 foot wide section of County road, due primarily to the cost of ripping up retrenching, and replacing concrete. This cost is obviously much higher than installing a new line under bare or lesser-developed ground. In other instances, especially within older Centers, it may not categorically be cheaper to "rip up and replace" infrastructure for a variety of other reasons. *The final SEIS must contain an analysis and discussion of the comparative costs of replacing existing vs. installing new infrastructure.*

8. The final SEIS must analyze the effect of misstating land capacity on the success or failure of the Affordable Housing Policies:

LA-4
Ho-1 As mentioned above, our Association feels that King County's land capacity was overstated by a large amount. If the final CPP's are based on these figures, a land shortage may result, driving up land prices in all of King County and beyond. This will in turn reduce the effectiveness of many of the well-intended Affordable Housing Policies by increasing the cost of all land, even those parcels that are slated for affordable housing development. *The final SEIS must analyze the effect of misstated land capacity on land prices, and the effect of this on the success or failure of the Affordable Housing Policies.*

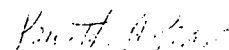
9. The final SEIS must analyze the effect of increased land costs on the affordability of housing:

The SEIS in several locations concludes that the cost of land will rise in the 8 and 14 Centers Alternatives somewhat as a result of the Policies, although it opines that the per unit cost may decrease as a result of higher yields. However, in the Affordable Housing section, the effect of these increases is not addressed as it relates to the affordability of housing in the Centers. *The final SEIS must contain an analysis of the effect of increased land costs on the affordable housing policies, especially in the Centers.*

Thank you for the opportunity to comment on this most important legislation. As was mentioned at the outset, our Association supports the Centers Concept provided that affordable housing, economic vitality, and quality of life can be provided inside and outside of them.

These comments are intended to be constructive in nature, and any semblance otherwise is unintentional. Please call me at the above number with questions or comments.

Yours sincerely,



Kenneth A. Pease
1994 President-elect

MS:ms
skcar/seis



Federal Way Water & Sewer

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February 28, 1994

Lisa Madjiak, Growth Management Project Supervisor
Planning and Community Development Division
Parks, Planning and Resources Department
707 Smith Tower Building
506 Second Avenue
Seattle, WA 98104

RECEIVED

FEB 28 1994

RE: DSEIS for the Countywide Planning Policies

Dear Ms. Madjiak:

Thank you for the opportunity to review the Draft Supplemental Environmental Impact Statement (DSEIS) for the Countywide Planning Policies (CWPPs). The comments which follow, focus on concerns we have in connection with the District's role as a purveyor of municipal water and sanitary sewer services, to a population in excess of one hundred thousand, as well as on certain broader issues which we consider to be critical to the long term viability of any planning instrument, such as the CWPPs. With regard to the CWPPs, we feel that the policies governing growth throughout King County must, as their primary aim, consider the relationship between the level and manner of development and the supply and quality of water. As a result of our long-running experience with water resource issues, it has become eminently apparent that if the management of this critical resource is ever neglected, the consequences may be both catastrophic and irreversible.

The very essence of the CWPPs are, and have to be, a basic determination of the locations in which higher density growth shall be encouraged and allowed and, correspondingly, the areas in which it shall be discouraged and prohibited. In defining these, the CWPPs make numerous assumptions about the effect of various development patterns on the water resource and the cost of water, many of which we challenge in these comments. Moreover, in our vision of the best situation, the County would completely reject the current designations of the Urban Growth Areas as any ultimate conclusion regarding growth patterns in the County, until such time as the implications of these growth policies on water resource issues have been thoroughly studied. Without putting the horse squarely in front of the cart, the County risks setting into motion the instrumentality which may lead to the severe and lasting degradation of the public water supply. If this is allowed to occur, growth planning in the future will, by necessity, not only take these issues into account, but the alternatives for

Donald L.P. Miller
Commissioner

Dale A. Cap
Commissioner

Beverly J. Tweddle
Commissioner

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development will be severely restricted as a direct result thereof. This, we believe, is not good planning.

Without knowing more about the process to this point, we are not able to ascertain whether the County has complied with all of the substantive and procedural requirements of SEPA as it applies to the preparation and circulation of the DSEIS. While we have every reason to believe SEPA has been adequately followed, we will reserve the right to challenge any deficiency in this area which may be discovered.

Federal Way Water and Sewer District staff have carefully reviewed the DSEIS and offer our detailed comments herein. These comments are in addition to those we incorporate by reference in the attached letters to the Planning and Community Development Division dated March 11, 1993 and to the Growth Management Planning Council from the King County Urban Groundwater Purveyors.

1. The Growth Management Act mandates that the land use element of Comprehensive Plans provide for protection of both the quality and quantity of groundwater used for public water supplies. The DSEIS does not adequately address groundwater in the discussion of potential impacts. We understand that the analysis is from a regional perspective and that details regarding specific impacts are being left to the local jurisdictions. As presented, however, the DSEIS does not provide adequate discussion of groundwater resources and fails to address the extent to which future growth will impact recharge of those resources and will place additional demand on them.

The DSEIS fails to consider that certain areas within the county currently have been or may become designated by the EPA for consideration as Sole Source Aquifer Protection Areas. The District is currently in the process of preparing its petition for designation of the greater District as a Sole Source Aquifer Protection Area and we would expect that other municipal purveyors within the county may do likewise. Once in place, the regulations call, among other things, for the state and municipalities to consider and implement measures to mitigate the effect of certain public improvements on the water supply as a condition and requirement of receiving Federal funding. The implications to the receipt and utilization of Federal grant funds for capital improvement projects in such areas can be significant. The economic and other effects on the development of infrastructure necessary to deliver urban services in these areas in light of this should be extensively studied.

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We request that the SEIS analyze and quantify groundwater impacts of each and every CWPP and consider policy alternatives--including but not limited to redefining Urban Growth Area (UGA) boundaries--that would tend to minimize adverse impacts on groundwater.

2. The document assumes throughout that the majority of resource/sensitive lands are located in rural areas and that increasing density in urban areas will reduce impacts on resource and sensitive areas by reducing development pressure. In application, this assumption could have a detrimental effect on groundwater recharge, and other critical areas, located within (west of) the Urban Growth Boundary by concentrating adverse impacts within that area.

We request that the SEIS present empirical information regarding the location of resource/sensitive lands and examine alternatives (including but not limited to redefining UGA boundaries) that would tend to minimize adverse impacts on such lands.

3. On page 3 of the Introduction, it is stated that the analysis of the SEIS considers employment and household growth targets that distribute jobs and household growth geographically within the County within broadly defined areas, rather than discrete areas that would allow quantitative analysis, such as by jurisdiction. We believe that a quantitative analysis is appropriate at this point and request that the SEIS perform such an analysis for each and every local jurisdiction.

4. The Growth Management Act requires an analysis of fiscal impacts, which has not been performed in the DSEIS. We understand this analysis is being performed by the Fiscal/Economic Development (FIS/ED) Task Force, and reserve judgment pending our opportunity to review and comment on the work of that group, which we feel should identify impacts on all local governments (not just general purpose governments) as well as business.

5. Page 18 of the Land Use section notes that land capacity findings do not indicate whether infrastructure capacity for water and sewer exists in those areas reporting land capacity under current zoning. It goes on to say that a more realistic sense of land capacity will only be introduced as policy discussions advance and comprehensive plans are prepared. It is our understanding that comprehensive plans are currently being drafted by most jurisdictions in King County and that policies are already developed/adopted. The issue of infrastructure availability/capacity is critical to the types of land use decisions being made and should have been evaluated prior to plan

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development, particularly in light of the concurrency requirements of the GMA. The attempt at diffusing this inadequacy by admitting it is not compelling.

We request that infrastructure availability/capacity be evaluated and that land capacity findings be revised, as appropriate, pursuant to that evaluation.

6. In discussing Urban Growth Areas, on page 19 the document states that "Urban Growth is defined as growth that makes intensive use of land for the location of buildings, structures, and impermeable surfaces to such a degree as to be incompatible with the primary use of such land for..." The document further states that the UGA is a permanent designation. We believe that, prior to this type of designation being permanently applied to an area, sufficient data should have been evaluated to determine the appropriateness of the designation. Given the lack of data available for inclusion in this DSEIS, we do not believe a responsible level of analysis has been provided, especially in regard to water quantity.

Inasmuch as UGA boundaries would seem to reflect the preferences of elected officials, as well as the data available to inform their decision-making, at a particular point in time, we have some difficulty accepting that current UGA designations are indeed permanent. Is it the position of County planning staff that the legislative authorities of the County and cities have no power to change current UGA boundaries under any circumstances?

LA-12 We request that the SEIS either delete all references to the permanence of UGA boundaries or include a formal legal opinion supporting that permanence.

15-1 7. Page 110, Police/Fire/Emergency Response, notes that policies FW-10, FW-25, FW-26 and CO-1 would assist in mitigating the adverse impacts of future growth by requiring cities to be the appropriate providers of local urban services and the County to be the appropriate provider of countywide services. This fails not only to demonstrate how this can benefit the public but does not account for the many service providers who are neither cities nor counties. Examples of such service providers include: water and sewer districts, library districts, hospital districts, fire districts, school districts, PUDs and conservation districts. The language limits the possible combination of providers that may serve a given population. In many cases, these special purpose district service areas are larger than nearby cities and/or overlap political boundaries.

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Requiring cities to be the sole providers of urban services, therefore, may necessitate dismemberment of established water and sewer utilities wherever such services are provided by special districts that overlap with the jurisdictional boundaries of more than one city. We request the SEIS specifically identify all such cases and examine all issues in connection with such dismemberment, including but not limited to the following: (a) delineate any and all impacts on delivery of water and sewer service; (b) determine the effects on outstanding revenue bonds of the affected special districts, as well as the effects on issuance of future revenue bonds; (c) estimate new utility tax burdens and/or rate surcharges to which customers of those special districts will be subject; (d) identify any utility customers who will lose the right to vote on water and sewer issues and discuss potential legal and political issues that may be raised; (e) identify and estimate all other cost and financial impacts, including those resulting from loss of scale economies.

Another possibility is that one city may assume complete control of the special district, subsequently providing water and sewer service within the jurisdictional boundaries of other cities and/or unincorporated areas. For this case, we request that the SEIS also examine the above-mentioned points "a" through "e."

15-13 8. Page 116 discusses Policy LU-14 which requires that UGA include only areas already characterized by urban development because these areas can be efficiently and cost effectively served by water and sanitary sewer within the next 20 years. Depending on future growth and the level of increased demand on services, however, it may not be possible to provide certain services cost effectively. For example, if population growth exceeds the amount of available water, new sources may be extremely costly (such as desalination plants). These types of issues underscore the need to fully evaluate the impacts of projected growth throughout the County prior to making decisions.

15-13 9. The Water Supply section (page 125) states that the Pre-Countywide Planning Policies Alternative has the most dispersed growth pattern which will increase demand more significantly than others and will likely result in a need to increase development of water supply sources sooner than the other alternatives. In itself, dispersed development will not increase water demand. To the extent that dispersed development implies lower density, water supplies may be affected favorably through increased recharge in groundwater areas.

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We request the SEIS accurately reflect the advantages of the Pre-CWPP Alternative on water supply and that statements on the relationship between dispersed development and water demand be corrected.

10. On page 127, the introduction states that other independent water purveyors are evaluating whether there is adequate groundwater to meet the demands for increased water supply in their individual service areas. It goes on to say that the extent to which these alternatives can direct growth to reduce demand and therefore reduce impacts on the existing supply sources, storage, transmission and distribution infrastructure is the focus of this analysis. Although this is an excellent idea, we are not aware that this is being done. Up to this point, there has not been the required level of coordination for this type of effort to occur.

11. A statement is made on page 128 (and others) which says that because the Regional Transit System Plan concentrates growth in urban areas, a positive impact on the source supplies and delivery of water services will result. This is not necessarily true--existing lines may be inadequately sized to serve these areas and may need to be replaced, which is generally more expensive in heavily developed areas. At the same time, concentrated growth occurring over aquifer recharge areas may have a negative impact on source supplies.

Additional growth will not only create further demand for water but also create more impervious cover which keeps water from infiltrating back into the ground to replenish aquifers. At this time, aquifers are the major source of supply to over 100,000 people in the Greater Federal Way area, and nearly 400,000 people countywide. This may have an impact on existing water rights and may therefore bring into the picture the possibility of "taking" claims. We request the SEIS include a detailed assessment of impacts on groundwater supplies for each and every CWPP and identify and assess the efficacy of alternatives--including but not limited to alternative UGA boundaries--that would minimize negative impacts on groundwater supplies. We further request the SEIS provide data, applicable to the instant situation, supporting the contention that delivery of water to higher densities will reduce costs.

12. On page 129, under the magnet alternative, it states that a higher percentage of households would locate in rural cities and adjacent rural areas "where major improvements to water storage, transmission and distribution systems may be needed." According to

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the GMA, it is unreasonable and inefficient to expect urban services to be provided in rural areas. Please clarify this discussion.

13. Page 130, under Mitigation Measures, coordinated planning efforts are listed and it is noted that King County would continue to require that local purveyor plans be consistent with other applicable plans, policies and land use controls. The GMA requires that the land use element be reassessed if probable funding falls short of meeting existing needs for public facilities. Please clarify this discussion.

14. Within the Stormwater Management section, under the main findings (page 132) the last paragraph lists mitigation measures including impermeable infiltration galleries. This appears to be an impossibility, in that impermeability would tend to make infiltration impossible. Please provide additional explanation or correction in this area.

15. On page 136, the document states that new growth would be phased into urbanized areas that would have excess infrastructure capacity. We are not aware of any areas that have current excess capacity sufficient to accommodate the densities envisioned in the CWPPs. Please provide additional explanation or correction in this area.

16. The entire discussion of stormwater management fails to recognize that, within groundwater recharge areas, stormwater management practices affect water supplies. Under current practices, stormwater is managed as a type of sewage to be disposed of rather than a key element of water resources; any recharge of groundwater that may occur through retention/detention facilities is incidental to the main objective of reducing overall system costs by decreasing peak runoff rates.

We request the SEIS revise all CWPPs dealing with stormwater management within groundwater recharge areas to require complete protection of groundwater resources. We also request the SEIS consider policy alternatives--including but not limited to redefining UGA boundaries--that would tend to minimize adverse impacts on groundwater. In addition, we request the SEIS include analysis of all potential water rights issues that may be raised under each and every CWPP, UGA and planning scenario examined.

17. The designation of Local Service Areas within Urban Growth Areas (page 139, Sewer/Septic) needs to be resolved. The text indicates that on-site systems outside of LSA's are intended to be

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permanent. The LSA designation, as it currently exists, prohibits the planning and extension of sewer service to these areas. Many of these existing areas are now within the UGA and will be expected to be provided with urban services (including sanitary sewers). These areas have not been allowed to be included in Comprehensive Sewer Plans and as such, are not included in estimating future capacity requirements and impacts to the existing system have not been identified. As long as this designation remains in place, property within it will continue to develop at densities low enough to allow on-site septic systems. There is inconsistency between this designation and the GMA as applied to property within the UGA. Please clarify this discussion.

The District supports the use of on-site systems. If these same properties are expected to support higher densities, however, the property owners should not have to invest in a sewage disposal system twice. In addition, it may take many years for the property to "redevelop" and as such will not accommodate projected growth/densities. Further evaluation should be completed in order to determine if this type of designation is an appropriate growth control tool in light of current growth management policies.

18. The CWPPs are intended to promote high levels of density within UGAs and therefore discourage use of on-site sewage disposal systems within the UGAs. Properly working septic systems, however, provide recharge to aquifers, and we request the SEIS quantify the loss of groundwater recharge that will result from implementation of each and every CWPP and identify and evaluate alternatives designed to preserve and enhance recycling of water resources through on-site systems.

Under the no action alternative (page 142) it states that capacity for transmission and treatment is under study. As mentioned previously (under Water Supply) there has not been, up to this point, the required level of coordination for this type of effort to occur. Again, the issue of LSA designations prohibits the planning for non-LSA areas.

This section needs to address other sewer issues such as NPDES permits that are required by treatment plants in order to discharge effluent to Puget Sound. How will additional growth and the types of growth (residential vs. industrial) impact these permits? What about wastewater reuse? Recycled wastewater is an underutilized resource that will be more important as demands for potable water increase. Biosolids management is another area that needs to be addressed. How will biosolids produced at the treatment plants be managed (this is a regional issue). Will composting be encouraged?

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We request the SEIS address changes that will be required for NPDES permits, wastewater reuse practices and biosolids management.

Metro's system is the only one given any attention in this DSEIS. By not including other wastewater treatment providers the SEIS falls short of providing the necessary level of information required for the types of decisions facing King County elected officials. The Water Supply section is also remiss in not including purveyors other than Seattle.

We request the SEIS assess impacts on non-Metro and non-SWD agencies.

NS-7

NS-10

19. The Sensitive Areas and Resource Lands section on page 155 states that the King County Sensitive Areas Ordinance was passed to meet the challenges and satisfy the requirements of the GMA with regard to all critical areas except aquifer recharge areas, which require a different regulatory approach. Where is this approach discussed? Please provide details. In addition, the hydraulic continuity of surface and groundwater should be discussed especially as it relates to maintaining in-stream flows.

It appears the Magnet Alternative is the only option that acknowledges the importance of aquifer recharge areas.

On page 159, the affordable housing policies that call for revising land use regulations as needed to remove barriers for citing affordable housing should ensure that any variance granted to one segment of the population does not result in adverse impacts to the population as a whole. For instance, if development standards aimed at enhancing recharge of storm water are waived for certain projects, this waiver could be detrimental to the water supply for the entire area.

Throughout the document, reference is made to many of the alternatives and/or policies having positive impacts on sensitive areas and resource lands in rural areas while apparently placing greater stress on sensitive lands in urban areas. This issue deserves serious attention.

In many instances throughout King County, groundwater is the primary source of drinking water (in addition to meeting other demands). These groundwater sources are, in many instances, recharged locally. Elimination of recharge to the aquifer will eliminate the resource. Sensitive lands (aquifer recharge areas) in urban areas are at far greater risk than those in rural areas and should be given proper recognition.

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Language on page 161 under mitigation measures notes that the newly adopted King County Zoning Code provides some additional mitigation to sensitive areas through provision of: transfer of residential density credits (for sending sites with groundwater recharge values,...) What is meant by "sending" sites? And how are recharge values determined?

NS-11 20. A major failing of the section on Water Quality, as well as a number of other sections, is that they neglect to recognize the importance of forthcoming Groundwater Management Plans. These plans are required pursuant to R.C.W. 90.44, which antedates GMA and with which GMA must be consistent. Although Groundwater Management Plans are not yet available in final form, existing drafts cast serious doubt on the feasibility of protecting groundwater quantity and quality under the current CWPPs and with the densities envisioned under current UGA boundaries. We request the SEIS address the likely impact of Groundwater Management Plans on the CWPPs.

IS-36 The section on groundwater (page 175) includes information that is not accurate for the Federal Way area aquifers. Our principal aquifers are located at a minimum of 150 feet in depth (as opposed to 25-50 feet) This section contains very little information on groundwater resources and, in fact, most of the discussion beyond the first 3 paragraphs relates to surface water. We request the SEIS include accurate information for all aquifer systems.

Under significant impacts, a statement is made that existing wastewater and drainage systems are degrading water quality thresholds. This type of statement warrants some explanation regarding what type of wastewater systems and which drainage systems are degrading water quality and what water is being degraded. Please clarify these statements.

The discussion on page 176 dealing with the degree to which pollutants affect regional and local water resources is incomplete and should include information such as depth to water table, type of constituent and type of intervening material. Please correct this discussion.

The assumption is made again that water quality is least negatively affected when growth occurs in urban areas. Please provide empirical information showing how urban development, as envisioned in the CWPPs, is optimal for water quality protection.

Septic systems are also mentioned as potential sources of

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pollutants to surface and groundwater sources. Except for unusually shallow aquifers, septic system failures cause problems for surface water rather than groundwater. In the case of Federal Way, our shallowest aquifer used for municipal purposes is 150 feet below the ground. Water travels through this 150 foot "filter" prior to reaching the aquifer system. Septic systems in the Greater Federal Way area may provide as much as one million gallons of recharge per day. We request the SEIS provide an accurate discussion of septic systems, their benefits and potential problems.

On page 141, under mitigation measures, impacts should include the loss of recharge resulting from the elimination of septic systems in urban areas. It is also stated that in general, growth concentrations will deliver wastewater to the Metro system where there is adequate capacity. The City of Federal Way has nominated itself to be an Urban Center. This designation will result in significant growth impacts including those to our wastewater treatment and transmission capacity. Additional growth in the Federal Way Area will not impact Metro's system. A reference is also made that local service districts will need to make extensive capital improvements in order to accommodate growth and provide urban level standards of service. Once again, the LSA issue will need to be resolved.

Under impacts of alternatives, it is assumed that the infrastructure is least affected when growth occurs in urban areas where existing sewer service is provided by Metro. Metro is not the sewer service provider in all urban areas. In addition, impacts should include the elimination of septic systems and the resulting reduction in groundwater recharge.

NS-10 21. The DSEIS states "The County also has significant ground water resources." Please specify the ground water resources under County control and/or jurisdiction and identify the relevant Department of Ecology permits granting water rights to the County.

NS-11 22. The DSEIS states that Issaquah has an aquifer recharge area "directly beneath downtown Issaquah." Since downtown Issaquah would appear to consist mostly of impervious surfaces, we suggest the subject area be described as a "former" or "defunct" aquifer recharge area.

23. We support policies, such as those mentioned on page 182 regarding protection of plants, animals and fish as these policies also provide for protection of water quality and quantity.


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24. We support policies, such as those mentioned on page 203 regarding protection of the natural environment as a key economic value in the region.

25. CWPP LU-R4 calls for the County Council to "convene a meeting with municipal elected officials to determine a process for disbanding the Washington State Boundary for King County and establishing criteria to oversee municipal and special district annexations, mergers, and incorporations..." We have the following comments and concerns: (1) a single meeting among elected officials is inadequate to address the myriad of issues involved with abolition of the BRB; (2) municipal elected officials should include representatives of special districts, whose customers may be negatively affected by this action; (3) the BRB currently is authorized to review assumptions of jurisdiction, as well as annexations, mergers and incorporations; (4) any replacement for the BRB should provide for due process, including judicial review. We request the SEIS specifically the foregoing issues.

Once again, thank you for the opportunity to review the DSEIS. We hope our comments will assist you in developing a final document that will serve the needs of our citizens and their elected decision makers. Please let us know if we can be of any assistance to you. I can be reached at 946-5428.

Sincerely,



Steven H. Pritchett
Legal Counsel

C: Board of Commissioners
Steve Weineke, Director, Engineering & Technical Services
Roger Brown, Director, Administration & Finance
Mary Duty, Principal Planner



Federal Way Water & Sewer

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March 11, 1993

Ms. Lisa Madjaik
GMA Project Supervisor
King County Planning and
Community Development

RE: Countywide Planning Policies - SEIS Scope

Dear Ms. Madjaik:

On behalf of the Board of Commissioners of Federal Way Water and Sewer District, I am writing to let you know of our concerns regarding King County's Countywide Planning Policies as they relate to protection of aquifers. Our concerns, which generally parallel those previously expressed to you by Union Hill Water Association, are as follows:

A. Overall Environmental Protection (pg.9)

FW-3 & 4: These policies address management of water resources. It should be clearly stated that land use activity competes with natural recharge of aquifer systems. Policy FW-3 should include mention of water quantity in addition to quality.

C. Aquifers (pg.10)

CA-5: The policy calls out protection of public health as an objective; the importance of groundwater quantity as it relates to aquifer recharge areas should also be emphasized. Best management practices within aquifer recharge areas should include protection of water quality, quantity and availability.

D. Fish and Wildlife Habitat (pg.10)

CA-8: This policy should include aquifer recharge as one of the functions provided by natural drainage systems. Runoff and discharge from development should take this into account.

2. Conservation, Efficiency, Cost Effectiveness and New Technologies (pg.41)

CO-7: This policy encourages water reuse and reclamation for large commercial and residential developments and for high water users such as parks, schools, etc.

The policy should contemplate recharge of aquifers by proper management of storm water and on-site septic systems.

Donald L.P. Miller
Commissioner

Dale A. Cap
Commissioner

Beverly J. Tweddle
Commissioner

Lisa Madjaik
March 11, 1993
Page 2

1. Urban Water and Sewer Systems Required (pg. 42)

CO-10: This policy states that urban water and sewer systems are preferred for new construction on existing lots and shall be required for new subdivisions. Existing septic systems are allowed as long as densities and physical conditions are appropriate and as long as the systems are allowed by the relevant jurisdiction.

Properly working septic systems may provide recharge to aquifers, which in certain cases are a major source of water supply. Routinely eliminating properly working systems in aquifer recharge areas could cause adverse environmental impacts by reducing the supply of potable water. It would also result in substantial costs to the property owner to pay for sewer installation. This policy should be rewritten to include special requirements in aquifer recharge areas.

In addition to addressing the foregoing specific policies, we feel that the SEIS on County-Wide Planning Policies should identify the location of aquifer recharge areas, discuss the potential impacts on water quantity and quality by locating urban centers and urban growth areas in aquifer recharge areas and identify and discuss potential mitigating measures.

If you have any questions, please call Mary Duty at 946-5415.

Sincerely,

Dale A. Cap

Dale A. Cap, President
Board of Commissioners

DAC/lkm

c: Board of Commissioners
Roger M. Brown, Director, Finance and Administration
Steve Wianke, Director, Engineering & Technical Services
Don Young, Director, Operations
Steve Pritchett, Legal Counsel
Mary Duty, Environmental Planner
Dick Chapin, Inslee, Best, Doezie & Rydar, P.S.
Union Hill Water Association

Hedges & Roth Engineering, Inc.

ENGINEERS
PLANNERS
SURVEYORS
ARCHITECTS

February 23, 1993

Lisa Majdiak, Growth Management Project Supervisor
King County Planning and Community Development Division
707 Smith Tower, 506 Second Avenue
Seattle, Washington 98104
FAX: (206) 296-0119

Re: SEPA File Number NPA930215A
Countywide Planning Policies Phase II

Ms. Majdiak:

Thank you for the opportunity to comment regarding the scoping for the SEIS for the proposed Countywide Planning Policies Phase II.

Hedges & Roth Engineering, Inc. would like to commend the effort and dedication which has been exhibited by the staff members we have worked with throughout this phase of the regional implementation of the state Growth Management Act.

We support the state mandates found within the Growth Management Act and would take this opportunity to suggest the following:

The SEIS alternatives should provide information as to the location of existing infrastructure. This should include water, sewer, electrical, gas, and other utilities.

TS-1 Areas lacking capacity or with unfulfilled capacity should be identified. The costs, both economic and environmental, should be identified.

TS-4 The SEIS should provide a distinction between the treatment capacity and the conveyance system capacity issue (i.e. METRO vs. city/special purpose district facilities).

TS-6 Mitigation strategies should be defined for all of the above. How will existing contracts with agencies, such as the City of Seattle for water, be resolved? How will conveyance mains purchased via bonds, etc. be transferred to other agencies?

TS-16

In areas where utilities will need to be relocated due to either an increase (in) density, expansion of facilities or alteration of existing roadways, the SEIS should identify both areas of impact for each alternative in addition to the regulative, construction and environmental costs.

How will the proposed policies impact existing and future regional and local facilities such as reservoirs, lift stations, electrical substations, etc.?

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Ms. Lisa Majdiak
February 23, 1993
Page 2

What are the siting and service area implications of the alternatives?

What are the implications of "encouraging" growth into the centers vs. allowing growth to occur at a natural pace within the urban area.

Have these alternatives taken into account the enormous (revisions to) areas within the Soos Creek, Tahoma/Raven Heights, Northshore and East Sammamish Community Plans? These plans have taken or propose to take hundreds of acres out of the urban designation, in addition to the 53 square miles proposed by the Growth Management Planning Councils' redesignation of the urban and rural areas of King County.

What will be the transportation and environmental consequences (regarding) the need to retrofit utilities within the urban areas to accommodate the increased densities?

In June we expressed our concerns regarding the May 5, 1992 Determination of Significance issued for the Proposed Countywide Planning Policies. The comments we expressed at that time still apply. We have included "Appendix A" of our June 19th letter to Councilmember Audrey Gruger with this package.

Like you, we are aware of the great amount of regional resources which have been expended to create, not only the proposed policies and alternatives, but (also) the consensus of the members of the Growth Management Planning Council. The quality of life we wish to preserve may be at risk without proper consideration of alternatives and impacts. The Growth Management Act allows us this window of opportunity to assess those alternatives and impacts. Please use our future wisely.

Please do not hesitate to contact Helen Nilon, our Governmental Affairs Liaison at 869-9448, or me if we can be of further assistance with this matter.

Very truly yours,

HEDGES & ROTH ENGINEERING, INC.
Bellevue Office

John F. Roth, Jr., P.E.

JFR:hen
cc: King County Councilmembers
Growth Management Planning Councilmembers
Helen E. Nilon, Hedges & Roth Engineering, Inc.
(revised 2-28-94)

Hedges
& Roth Engineering, Inc.

ENR0312.doc/SEIS.ltr

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Feb. 27, 1994

2427 271st Ave SE
Issaquah, WA 98027

Jim Reid, Manager
Div. of Planning and Community Development
707 Smith Tower Building
506 Second Ave.
Seattle, WA 98104

Dear Mr. Reid,

I have the following comments on the DSEIS for the County Wide Planning Policies.

1. This DSEIS inadequately analyzes numerous impacts of the proposal and the alternatives. WAC 197-11-060(4)(d) requires direct and indirect impacts of a proposal to be analyzed. The proposal and the alternatives set precedents regarding land use. These precedents will produce probable significant adverse impacts. These probable significant adverse impacts are omitted or inadequately analyzed. For example, how do the alternatives compare with respect to impacts to the largely rural watersheds which will become urbanized as a result of this action? What are the probable significant adverse impacts of not complying with the GMA?

2. This DSEIS inadequately analyzes mitigations for the proposal and each alternative. For example, will basin planning mitigate impacts? In which watersheds will basin plans be implemented? Could basin plans be implemented as a required or proposed mitigation in basins not presently included in basin plans?

3. WAC 197-11-442 encourages agencies to evaluate the alternatives in terms of alternative means of accomplishing a stated objective. What is the objective of this action? Which alternatives achieve this objective? How do the relative environmental impacts compare for the different alternatives that meet this objective? For example, what will impacts be to salmon habitat in the Snoqualmie Basin for the proposal and each alternative? Unless this SEIS analyzes environmental impacts with regard to how well each alternative achieves the stated objective, it is inadequate. Without this analysis, choosing between the alternatives with regard to environmental impacts is not possible.

4. This DSEIS is inadequate because it does not analyze an appropriate range of mitigations/alternatives. For example, one of the primary objectives of this action (I think, the DEIS is not clear on objectives), is to bring King County into compliance with the GMA. One of the GMA's goals is to establish a long term, defensible urban/rural line. This DEIS only considers one location for the urban/rural line. What are the probable significant adverse impacts and appropriate mitigations if this line is moved east into presently rural areas? Extending Metro sewer to properties entirely within the Snoqualmie Basin will overturn long standing County policy, why were probable significant adverse impacts of this action ignored?

5. This DEIS is inadequate because it does not analyze impacts of the 1993 East Sammamish Community Plan locating the urban/rural line someplace other than the GMPC's recommended location. The GMPC may move the urban/rural line as a mitigation, but this reasonable mitigation is also omitted and not analyzed in this SEIS. What are the probable significant adverse impacts if the urban/rural line is located at the 205 ft elevation contour of Patterson Creek in the Snoqualmie Basin? (which is what the 1993 East Sammamish Community Plan has done, a fact which was inappropriately omitted from this SEIS)

Thank-you for the opportunity to participate in the process.

Sincerely,

Tom Sanderson

Tom Sanderson

SRO STERLING REALTY ORGANIZATION

David Schooler
President
Director 206-455-8101

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FEB 28 1994
PCDD

February 25, 1994

Ms. Lisa Majdiak
Project Supervisor
Growth Management
King County Planning & Community
Development Division
Smith Tower
506 - 2nd Ave. #707
Seattle, WA 98104

Dear Ms. Majdiak

IN-2
LA-6
This letter is a comment on the SEIS for the County-Wide Planning Policies. I believe that the utility of the document is severely limited by the inadequate amount of information on market forces behind the changes in housing and employment patterns, plus information regarding existing and planned infrastructure.

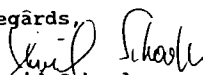
LA-9
LA-8
IN-5
In my opinion, the County should examine the patterns of change of both housing and jobs and compare those to the planned targets. For example, if the planned mix of housing styles in the future emphasizes multiple dwelling locations in urban centers to a much greater extent than today, what changes in demographics support that? Is this where families will be living? What societal changes are necessary to make this type of housing more desirable than at present? What economic changes are necessary to make these dwelling units comparatively more affordable? Furthermore, what changes in local comprehensive plans will be necessary to effectuate these policies?

LA-13
LA-1(f)
A similar analysis should be performed on planned employment. It is also my opinion that the County should analyze it's existing infrastructure to determine how

Page 2.
February 25, 1994

IN-4
will it meet the planned targets, what changes, if any, are necessary to meet those targets and a cost plus required effort to make those changes.

Thank you for this opportunity to comment.

Regards,

David Schooler
President

DS/tc

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE CPPS

To: Lisa Majdiak

From: Russ Segner FIS/ED Task Force member.

Here are my specific comments to sections of the draft with pages noted.

p. 24 In the discussion of compact development contemplated in the plan, the analysis cites several significant *positive elements* of the CPPs. One of these is possible reduction in long term cost of serving new development, but goes on to cite that "there is no firm conclusion on this complex issue". It does recognize "Other work suggests, however, that compact development may require high costs for rehabilitation of existing infrastructure in already developed area".

My comment is, "If there is no conclusive data that indicates costs would be reduced under denser development, while at the same time, it is recognized that the cost of redevelopment is going to be higher, the argument for density as a strategy is undermined because such development will be inherently noncompetitive with alternatives. This is definitely going to be so for multi-story developments such as the new Fred Hutchinson facilities at the south end of Lake Union even if no additional expenditures were needed for infrastructure because the land base is costlier by a factor of 10 to 1, at least."

pp. 33 & 34 The whole question of capacity is a major concern. Because almost one half of the industrial/commercial capacity calculated is within Seattle, the numbers put forth about Seattle's undeveloped lands bears close scrutiny. For instance, the Table B-2 notes 666 acres available in 1992 while the 1993 Seattle Industrial survey cited less than 400 acres. Inspection clearly indicates that the lands do not exist or are in actual use as support for improved properties nearby. On-site inspection of lands suggests that the methodology used to calculate capacity simply does not fit the facts regardless of the fudge factors introduced to allow for critical areas and right-of-way.

The discussion of BOPs fails to comprehend the testimony of the last twenty years. BOPs are the direct reflection of market demand for facilities which could not be accommodated in the urban centers. It is obvious that the industrial/commercial zoned areas in Seattle remained static over twenty years. Growing and new companies had little or no choice except to migrate to the new capacity created in BOPs. The feeling that business took advantage of cheap land is misplaced. Careful analysis of rents will confirm that it was not cost of land that dictated choice, it was availability and flexibility.

This point must not be lost on planning for jobs under GMA. If the facilities needed by the emerging technologies will have the general characteristics of BOPs, the lack of vacant land to generate the potential space competitively is a clear warning that this plan cannot meet the needs of future technologies. The analysis states that two-thirds of the capacity cited in the Data Forum work is within redevelopment areas. We know that this type of redevelopment will not be competitive. The ability of the four jurisdictions, Bellevue, Kent, Kirkland and Seattle, to provide only room for between 2,600 and 4,300 jobs in BOPs on undeveloped land, therefore, means that there will be no readily available capacity in King County for these jobs.

BOB ROEGNER, MAYOR
STEVE LANCASTER, PLANNING DIRECTOR



PLANNING AND COMMUNITY DEVELOPMENT
25 WEST MAIN, AUBURN, WA 98001
(206) 931-3090

February 28, 1994

Lisa Majdiak, Growth Management Project Supervisor
Planning and Community Development Division
Parks, Planning and Resources Department
707 Smith Tower Building
506 Second Avenue
Seattle, WA 98104

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MAR 01 1994

Dear Ms. Majdiak:

The City of Auburn has reviewed the Draft Supplemental Environmental Impact Statement (SEIS) for the Countywide Planning Policies. Generally, the DSEIS does what it was required to do, setting "bookends" and a range of alternatives to examine potential impacts of various policies. A general problem with the document, however, is that development types are typically described quantitatively (25 dwelling units per acre, etc.) and may be difficult for the average reader to visualize. The Final SEIS needs to be more descriptive of the impacts, i.e., what might 25 dwelling units per acre or 50 employees per acre look like?

Throughout the document there seems to be a general belief that higher densities and compact development will lead to "increased public safety concerns" (Page 24, first column, fourth paragraph) or "a dramatic change in the urban form and potentially the quality of life" (Page 36, second column, third paragraph). There is no data to justify these statements.

The document infers (page 35, first column) that market forces have resulted in individuals choosing to live in single family homes on large lots. These individuals are making this choice based on a market which is clearly biased towards this decision by numerous government subsidies. By removing some of these subsidies or at least balancing the field through impact fees, etc., the preference for a single family home on a large lot may not be as clear cut as it now seems.

Redevelopment within the urban centers is a necessity to reach the population and employment targets. Some contend that the amount of redevelopment that will occur will be much lower than planned and that therefore, the urban growth boundary should be expanded. A tight urban growth boundary is one of the key factors to ensure that redevelopment will occur, thereby reducing sprawl (a goal of GMA). Significantly expanding the boundary may hamper our ability to meet these targets and goals.

Thank you for the opportunity to comment.

Sincerely,

Bob Sokol
Bob Sokol, AICP
Senior Planner
Department of Planning and Community Development

cc: Mayor Charles A. Booth
Councilmember Pat Burns, Chair, Planning and Community Development Committee

Seattle Water Department

Robert P. Groncznick, Superintendent
Norman B. Rice, Mayor



February 28, 1994

Lisa Majdiak
Growth Management Project Supervisor
King County Planning and Community Development Division
707 Smith Tower Building
506 Second Avenue
Seattle, WA 98104

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FEB 28 1994
PCDD

Subject: Comments on the Draft Supplemental Environmental Impact Statement (DSEIS) for the Countywide Planning Policies.

Dear Ms. Majdiak,

This letter is to convey a few comments regarding water supply issues as addressed in the DSEIS.

General Comments on the SEIS

The "broad, qualitative level" (noted in the overview) of the document makes it difficult to make specific comments. However, two items stand out under water supply issues.

1. Aquifer protection to maintain groundwater supplies is not adequately addressed. Seattle Water Department supports the position presented by the King County Urban Groundwater Purveyors in a letter to you dated February 25, 1994, in which they request additional aquifer protection guidance in the Countywide Planning Policies.
2. General conservation/reuse priorities to facilitate the use of reclaimed wastewater, abandoned groundwater wells, and graywater to meet non-potable water needs should be developed to help guide future planning and EIS process. Reuse and use of non-potable sources (e.g. abandoned wells) can potentially reduce water demand for potable water, total sewage volume and related capital expenditures.

Specific reuse measures/ideas are noted below:

- When possible, locate parks, ball fields, cemeteries and golf courses in close proximity to sewage treatment plants, treated sewage transmission lines and/or non-potable wells in order to facilitate use of reclaimed water for irrigation.
- When possible, encourage businesses with high, non-potable water demand (cooling, process water and irrigation) to locate in close proximity to sewage treatment plants, treated sewage transmission lines, or non-potable wells in order to facilitate use of reclaimed water.

Lisa Majdiak
Page 2
February 28, 1994

- Install reclaimed water transmission lines during sewer capital improvement projects to facilitate the distribution of reclaimed water from sewage treatment plants or treated sewage transmission lines to reclaimed water consumers.
- Develop policies and incentives for developers to minimize need for irrigation when reuse is not an option.
- Develop policies and incentives to install small, local wastewater treatment and reuse facilities during the development of planned, residential neighborhoods.

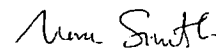
Specific Comments

Noted below are specific comments in Chapter 8.0 Water Supply

- 15-8 1. Affected Environment (p.126) - The DSEIS refers to the 1985 Seattle Water Supply Plan. The 1993 Seattle Water Supply Plan (adopted September 1993) would make a more accurate reference.
- 15-37 2. Under *Forecasting*, I would suggest adding the following words (noted in italics) "How growth occurs, even if total growth remains the same *within the SWD service area...*"
- 15-38 3. In the same paragraph (*Forecasting*), an inaccurate reference is made to the potential difference in water use depending on multifamily/single family mix. For an accurate reference, please refer to page 4-35 of the 1993 Seattle Water Supply Plan. The difference between a 33%/67% MF/SF mix and an 55%/45% MF/SF mix is 18 mgd. A more accurate use of this sensitivity analysis would be to refer to the specific percentage mix of MF/SF as noted above.
- 15-39 4. Under Significant Impacts - I would suggest the following change: "Seattle's recently adopted 1993 Water Supply Plan..."

I hope these comments are helpful. Thank you for the opportunity to comment.

Sincerely,



Nora Smith
Water Resource Planner

ns1/011

One Union Square
600 University Street, Suite 2000
Seattle, Washington 98101
Telephone: (206) 623-0200
FAX: (206) 623-0600

Jim Reid, Manager
Planning and Community Development Division
707 Smith Tower
506 2nd Avenue
Seattle, WA 98104

Dear Mr. Reid,

The following are comments on the Draft EIS for the
Countywide Planning Policies.

Land Use

LA-9 The Draft EIS speaks in terms of gross densities, which is misleading because it does not take into consideration what development will look like after land is removed for sensitive areas, roads, setbacks, etc. The general public relates to what is on the ground, which is a net rather than gross density. A single family density given in gross terms quickly becomes a rather high multifamily density once the undevelopable land is deducted.

Bellevue currently has a gross citywide density of 2 units per acre. The target gross citywide density for Bellevue under the "Activity Centers" alternatives is 15 units per acre. Kirkland currently has a gross citywide density of 4 units per acre and is targeted for a gross density of 12 units per acre. These higher gross densities will be met by significantly increasing the net densities throughout the cities, particularly in their downtown areas. To accommodate the growth planned for downtown Bellevue, 22 residential towers will be needed over the next twenty years. Thirteen (13) residential towers will be needed in downtown Kirkland to meet the projected need. Both cities will also need additional multifamily development in their neighborhoods to meet projections. Other suburban cities will see similar changes if the growth targets are to be met as planned.

LA-9 It is extremely important that the Final EIS discuss the difference between the gross and net density and the significance of the difference when planning for future growth. In doing so, please give both the existing gross and net densities of the City of Seattle and each of the suburban cities and the change to these densities, again in gross and net terms, with each alternative in the EIS. It would be helpful to include schematic sketches of various housing types based on the proposed densities.

LA-7 It has been demonstrated many times over, that residents of the cities are concerned about the construction of residential towers in downtown areas and the conversion of the single family housing stock to multifamily developments. Are the effected jurisdictions actually willing to accept the growth anticipated by the Countywide Planning Policies and, if so, have they published jurisdictional growth targets demonstrating this willingness?

LA-7 Please include the jurisdictional growth targets in the Final EIS and explain the consequences should the public reject these targets through the comprehensive planning efforts of each jurisdiction or through the review and approval of individual rezones or projects designed to achieve these targets. What land use tool will be used to ensure the jurisdictional targets are high enough to implement the approach adopted through the Countywide Planning Policies? What mechanism will be used to ensure jurisdictions are able to follow through on their growth targets in a manner neighborhoods will accept? How will jurisdictions address the tendency to add conditions to projects to make them more "desirable" to neighborhoods when these same conditions result in higher priced housing? Will infrastructure funding be reserved for only those areas that actually meet their targets by developing higher densities? Please answer these questions in the Final EIS.

LA-4
H0-6
W-5 There is market research that demonstrates the majority of future homebuyers, especially families, are not ready to accept multifamily living as a lifestyle of choice. The City of Seattle recently completed a preference survey that indicated a strong attachment to single family development. There is no track record that would indicate that lifestyle choices for the overall population can be controlled through regulation. The likely impact of regulation is not a change in general public opinion, but a rise in housing prices, whether multifamily or single family, and a greater disparity in the opportunities and choices offered to various income groups. Please address these socio-economic issues in the Final EIS.

Facilities and Services

15-9 Additional technical analysis should be included in the impact analysis and mitigating measure sections of each chapter of the EIS. For example, the Police Services Section of the DEIS provides a very generalized analysis and focuses on urban design as a solution to crime. No standards related to personnel or equipment were used to make judgements about existing conditions, impacts, or mitigating measures. Although nicely designed streetscapes are desired and may be helpful in deterring crime, they are not the primary solution. Given the importance of this issue to the public, a more thorough analysis should be included in the Final EIS.

15-4 Much of the analysis in other sections of the Draft EIS is too general and/or subjective to be useful in making decisions. For example, the document implies it is cost effective and generally beneficial to locate new growth in areas with existing infrastructure. No analysis is provided, however, about the condition and size of existing infrastructure, its relationship to today's standards, and the cost of upgrading the system should that be necessary. General comments are made about the high cost of upgrading existing infrastructure, but no real analysis or conclusions are provided. Please include a thorough discussion of these issues in the Final EIS.

15-1 Using the City of Seattle as an example, many of the school sites, streets, active parks (particularly play/ballfields), sewer facilities do not meet standards currently used for new construction. Under these circumstances, how will the impacts of concentrating growth in the several Activity Centers in the City be mitigated? Will older urban areas and developing areas have different standards? Will facilities be upgraded and if so generally what is the cost compared to building new facilities? Given that there is little unconstrained vacant land available in cities, how will large land users such as schools and play/ballfields be accommodated? Please discuss this in light of the fact that the land that is available will likely be needed for future housing?

Given that infrastructure needs and standards are pressing problems for many urban areas and studies providing insight into these issues and the costs involved are available, a more thorough analysis must be included in the Final EIS.

LA-10

40-6

LA-1(f)

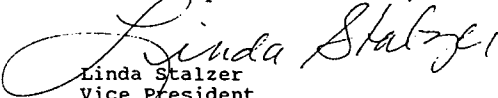
LA-4

Finally, the Draft EIS provides very little analysis of the Urban Areas outside the "Activity Centers". If the radical changes in the market do not occur as required by the "Activity Centers" alternatives, the growth will either locate in these Urban Areas or it will move to adjacent counties. Please explain in the Final EIS, how King County will ensure development can occur in its Urban Areas under these circumstances and how infrastructure needs will be addressed. Please discuss the impact on adjacent counties, should this not occur.

Thank you for the opportunity to comment.

Sincerely,

Lowe Enterprises Northwest, Inc.


Linda Stalzer
Vice President

Suburban Cities Association

OF KING COUNTY, WASHINGTON

ALGONA
AUBURN
BEAUX ARTS
BELLEVUE
BLACK DIAMOND
BOTHELL
BURIEN
CARNATION
CLYDE HILL
DES MOINES
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MILTON
NORMANDY PARK

NORTH BEND
PACIFIC
REDMOND
RENTON
SEA-TAC
SKYKOMISH
SNOQUALMIE
TUKWILA
WOODINVILLE
YARROW POINT

LA-10

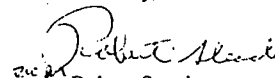
IN-6a)

IN-9

3. Much of the analysis concerns the environmental effects within the urban center areas as well as in the rural areas. We suggest that there be additional descriptions of the impacts of the various alternatives on the urban non-center areas as well.
4. In describing, under the affected environment section, how municipal services are provided for each element of the environment, it would be appropriate to include descriptions of how these services are provided by and in the suburban cities.
5. While it is appropriate to utilize defined alternatives for the document, the end recommendation may be a composite of various alternatives or a different alternative selected from between the "bookends." The draft does not readily provide a sense of order of magnitude between the various alternatives for each element analyzed. While the reader is told the ordinal ranking for each alternative, the reader does not get a sense for whether, for example; the "8 Centers" alternative has a 10 percent or 200 percent greater impact than the "14 Centers" alternative. Possibly for each element the alternatives could be arrayed on a continuum so their relationship to each other could be better understood.
6. As there are various proposed changes to the 1992 Urban Growth Boundary Line before the GMPC for consideration, it is most important that the Final SEIS adequately cover these proposals so that additional environmental review will not be necessary.

We hope these comments will be helpful and look forward to your responses. Should you have any questions please contact me or caucus staff Rob Odle.

Sincerely,


Robert Stead
Chair - SCA Caucus to GMPC

cc: SCA GMPC Caucus Members
Lynda Ring, SCA Staff
Rob Odle, City of Bellevue

February 28, 1994

Jim Reid, Manager
Planning and Community Development Division
Parks, Planning and Resources Department
707 Smith Tower Building, 506 2nd Avenue
Seattle, WA 98104

Re: DSEIS for the Countywide Planning Policies

Dear Mr. Reid,

The Suburban Cities Association Caucus to the GMPC has reviewed the Draft Supplemental Environmental Impact Statement (DSEIS) for the amendments to the Countywide Planning Policies and has asked me to convey their comments to you. In our review, we understand the limited nature of the document and the need to utilize previous environmental documents in order to have the complete environmental documentation. It is also recognized the purpose of this document is to provide an assessment of the impacts of the proposal on the environment and that this particular document in conjunction with other studies (such as the Marginal Cost Study) will aid the GMPC and the various jurisdictions in making decisions regarding the amendments.

Having reviewed the document in light of the above limitations we offer the following comments on the Draft SEIS.

1. The document has tried to quantify in very broad terms the policy alternatives. Also what is needed are qualitative descriptions of what the selection of one or a mix of the alternatives will mean for the citizens of King County. The final document would be more effective if the reader could have visualized through word and image what the alternative could look like.
2. Should a hybrid alternative be included in the Final SEIS, this hybrid should reflect the preliminary direction identified by the GMPC and should include revised housing and employment targets such as those now under consideration by GMPC.

BEAVER LAKE COMMUNITY CLUB

P.O. Box 431 ISSAQUAH, WA 98027

President	Mark Stendal	557-0202
Vice-President	Cory Wolfe	557-8344
Secretary	Sue Shecket	391-7421
Treasurer	Cathy Kitto	391-0155
Trustees	Harman and Allan	

February 28, 1994

Jim Reid, Manager
Div of Planning and Community Development
707 Smith Tower
506 Second Avenue
Seattle, WA 98104

Draft Supplemental Environmental Impact Statement
for the Countywide Planning Policies.

Dear Mr. Reid:

We have had the opportunity to review the DSEIS for the Countywide Planning Policies and have the following comments:

Beaver Lake and its adjoining watershed is located on the eastern ridge of the Sammamish Plateau just west of the Urban/Rural line.

Both the Water Quality (Chapter 15) and Sensitive Areas (Chapter 13) Chapters do not address watershed impacts and their effect on lakes as a result of these alternatives. The increase of impervious surfaces will cause significant stormwater runoff and increased phosphorus loading to lakes and wetlands.

King County has many small lakes located in urban areas designated since 1985. Beaver Lake is such an example, being phosphorus loaded (impacted) because of development in the watershed. Phosphorus loading feeds algae blooms in lakes increasing the eutrophication process and harming the recreational qualities of lakes. Beaver Lake is known for swimming and fishing and has a county park at the south end of the lake. The Beaver Lake Management Plan (KC-SWM) has determined phosphorus loading at 19 µg/l which is between fair and poor.

WAC 173-201-A-070 - Antidegradation The antidegradation policy of the State of Washington as generally guided by Chapter 90.48 RCW, Water Pollution Control Act and Chapter 90.54 RCW, Water Resources Act of 1971 is stated as follows:

- (1) Existing beneficial uses shall be maintained and protected and no further Degradation which would interfere with or become injurious to existing beneficial uses shall be allowed.

Beaver Lake's location at the edge of the Urban/Rural line gives it the opportunity to use the watershed as a separator between Urban and Rural utilizing the following Planning Policies:

- LU-14(e) Do not extend beyond natural boundaries, such as watersheds, which impede provision of urban service.
- LU-15 Urban separators as permanent low density lands which protect resource lands and environmentally sensitive areas and create open space corridors within and between urban areas providing environmental, visual, recreational and wildlife benefits.

DSEIS Countywide Planning Policies
Page 2

We feel that the protection of small lakes should be a major goal of the Comprehensive Plan which can be implemented by using the Beaver Lake Watershed as a urban separator.

Thank you for the opportunity to respond to your DSEIS. Please add the Beaver Lake Community Club to your distribution List.

Sincerely yours,

Mark Stendal
President

February 9, 1994

TO: Fis/ED Task Force

FM: Robbie Stern Chair, Economic Development Policy Sub-Committee and Captain, Econ. Dev. Chapter of DSEIS.

RE: Critique of Chapter 18: Economic Development of the King County Draft Supplemental Environmental Impact Statement (DSEIS) and 3 New Policy Recommendations

Any discussion of the DSEIS should begin with the acknowledgment that commenting on the DSEIS is not in the work program of the Fis/ED Task Force. The analysis provided here is for the benefit of the Task Force only. Comments on Economic Development or any other part of the DSEIS should only occur by the unanimous consensus of the Task Force. If consensus cannot be reached, individual Task Force members are of course free to comment on their own. Such comments should not be taken as the official position of the Fis/ED Task Force.

Introduction

The following pages critique the economic chapter of the DSEIS and recommend three new policies which fill gaps not covered by the earlier Fis/ED policies.

In reviewing the economic chapter it is important to keep in mind the fact that, by necessity, the chapter is an exercise in critical thinking rather than an analysis of facts or data which lead to conclusions. The key facts provided for analysis are simply the overall 20 year growth projections for population and employment, and fairly generalized assumptions about how this growth will be distributed within the County.

In general the chapter was not intended to perform an analysis of the feasibility of achieving the various land use alternatives, although a few observations are made regarding alternatives which stretch credulity. In essence the chapter reflects the author's experienced judgments about the likely outcomes of implementing the Countywide Planning Policies (CPPs) with little or no information on how the policies would be implemented through comprehensive plans and development regulations. In general, the analysis appears solid and reasonable. Nevertheless there are important points of disagreement and agreement which individuals on the Fis/ED Task Force may wish to note. These are discussed below.

Findings

1. DSEIS stresses the importance of multi-county cooperation and the uncertainty about cumulative impacts the CPPs would have when combined with any CPPs in Kitsap, Pierce and Snohomish counties. "Cumulative impacts will be significantly affected by the level of cooperation achieved between the four Central Puget Sound Region counties." If Pierce and Snohomish Counties elect strategies that are out of sync with King County either because they are more or less well defined, effects for King County are uncertain and potentially negative. (Page 199 & 206)

Finding: Fis/ED and others need to be brought up to speed on the Regional Economic Strategy Project managed by the Puget Sound Regional Council and the Central Puget Sound Economic Development District. This four-county effort involves major entities in the public, private, environmental, labor and education sectors. The strategy work should be integrated with growth management planning.

2. The DSEIS posits that the CPPs will not significantly expand the economy or its rate of growth relative to the much greater impacts of national and global economic forces. The CPPs could, however, significantly restrict King County's economy if the CPPs negatively influence the constancy and consistency of regulatory policy thereby increasing the risk of business investment decisions. (Page 201)

Finding: Good point. CPPs should reduce uncertainty, not increase it.

3. Attention is brought to the growing separation between economic activity and employment in the United States. Real GDP has been rising at a significantly faster rate than either employment or per worker wage and salary income. Consequently, future non-recession rates of growth will generate low rates of employment compared to past experience. (Page 202)

Finding: Elected officials and others should pay attention to this, adopt policies which encourage job growth, especially family wage jobs.

4. A result of the trend summarized in 3. above is for manufacturing companies to adopt technological innovation that increases production while reducing employment. "Future levels of production and the absorption of land into manufacturing uses could be substantially higher than a simple projection of employment would indicate... the likely net effect is for manufacturing's demand for land to grow more rapidly than its demand for workers." (Page 203)

Finding: DSEIS has identified an important trend that will work against GMA goals. Given the lack of land for manufacturing in King County, this point stresses the importance of preservation of industrial land if the County is to maintain and increase manufacturing employment. There may also be a need to provide incentives for multi-story manufacturing buildings and tenants.

5. Another trend identified is for newer high-tech companies such as prepackaged software and biomedical products production to agglomerate effecting the demand for industrial and commercial land because these firms have relatively few employees and locate on extensive land holdings. (Page 203)

Finding: Strongly disagree with the generalization of high tech firms in these industries needing extensive land holdings. Shapeware, Aldus, Active Voice, and Walker, Richer & Quinn are all examples of important high tech companies that are in multi-story urban settings. Furthermore, telecommunication technologies will decrease the need for tight (versus regional) patterns of agglomeration.

EC-4

EC-14

6. DSEIS finds that the No Action Alternative will result in a piecemeal approach to economic growth and development in the County. (Page 204)

Finding: Strongly agree.

7. Conclusion made that "Without the guidance that County growth and development policies, regional industrial siting policies, or a 3-county economic development strategy would provide, a distinct possibility exists that inter-jurisdictional competition for jobs could develop." (Page 204)

Finding: Important premise wrong conclusion. More likely effect of a lack of coordination will be to lose the 787. In other words, No Action will not result in Tukwila fighting Renton or Pierce County for the 787 plant but the lack of coordinated regional infrastructure investments to support such a plant, which could go to Kansas.

8. The major consequence of the Eight Centers Alternative will be to increase land use densities. It is doubtful if the projected growth in jobs and population will generate adequate demand to make the Fourteen Center Alternative feasible in terms of densities, HCT and envisioned non-auto oriented culture/lifestyle. (Page 204 & 205)

Finding: Reinforces findings of case studies and Fis/ED questions to GMPC regarding center designation. Self-nomination for centerdom with no viability criteria, which resulted in the Fourteen Center Alternative, is a poor idea.

9. Manufacturing Centers will experience a relative increase in land values. Manufacturing and industrial activities which use land extensively and generate low value-added per square foot will probably be price rationed out of centers. (Page 205)

Finding: Important warning. It emphasizes the need for monitoring of long term effects.

10. DSEIS opines that "in general incentives are less powerful than regulations as a tool for achieving specific policy objectives." (Emphasis added) (Page 206)

Finding: This is an important point. We need both regulations and incentives to achieve specific goals. For example, for achieving the specific goal of safeguarding workers' health and safety, regulating specific unsafe activities like making workers work with respirators in hazardous environments is the best way to achieve the goal rather than incentives. Few would argue that incentives alone for healthy workers, a long-term outcome, would safeguard all workers from short-term business decisions to cut costs. Or in the case of land-use policy objectives for maintaining open space and preventing sprawl, an Urban Growth Boundary is far more powerful and will be far more effective than open space incentives alone. The linking of both incentives and coordinated and balanced regulations is more powerful still. Fis/ED has underscored the importance of incentives but has yet to clearly present a comprehensive set.

11. "In the complete absence of any affordable housing policies, however, the urban centers are likely to exclusively contain middle and upper income housing." (Page 207)

Finding: Strongly agree. Declining real wages, increasing land and housing costs portend decreasing rates of home ownership and a great need for affordable housing. This reinforces findings from the case studies. There is a demonstrated need for affordable housing mechanisms not just policies. Even if all the regulations were simplified and eliminated there will still be a growing need for affordable housing simply because people's incomes are dropping or not growing. The County needs to support the extensive and rapid expansion of the non-profit housing sector and the financing mechanisms that support it as per the Affordable Housing Task Force Report.

12. "The overall thrust of the Fis/ED Task Force recommendations is to positively foster the growth and development of economic activity in the County that is sensitive to both the natural and human environment." (Page 208)

Finding: Well said.

Recommended New Policies in Response to the DSEIS

A. Jurisdictions, labor, business, and environmental groups should explore the potential to create a Regional Development Authority with the powers of eminent domain, land assembly, and environmental clean-up.

Rationale: The DSEIS characterizes the industrial land supply issue as one of great concern requiring regional solutions.

B. Jurisdictions should explore ways to clean-up and reuse contaminated sites.

Rationale: Currently there is a short supply of industrial land.

C. Jurisdictions should encourage the formation and use of Industrial Councils to prioritize infrastructure investments, and resolve area-wide issues like storm water runoff in Manufacturing/Industrial Centers.

Rationale: The long-term economic security of our region depends upon understanding industrial issues and responding with appropriate public policy. Industrial Councils will assist with this process.



MUCKLESHOOT INDIAN TRIBE
FISHERIES DEPARTMENT



February 28, 1994

Jim Reid, Manager
Planning and Community Development Division
Parks, Planning, and Resources Department
707 Smith Tower Building
506 Second Avenue
Seattle, WA 98104

RE: Supplemental Environmental Impact Statement for Amendments to the King County
Countywide Planning Policies.

Dear Mr. Reid:

The Environmental Division of the Muckleshoot Indian Tribe's Fisheries Department has reviewed the Supplement Environmental Impact Statement for Amendments to King County's Countywide Planning Policies (SEIS). You will find our specific comments enclosed. In general, the SEIS does a decent job outlining assumptions and factors that if modified, could change the environmental impacts. However, there are several environmental impacts that are missing from the analysis.

We strongly disagree with the statements on page 3, "...quantitative environmental analysis was not conducted for this SEIS, because the strategies and programs which would implement the proposed policies have not yet been designed by the County or cities. The policies does not provide adequate specificity that would allow a quantitative analysis of the potential impacts of future growth under each alternative." If a quantitative analysis of potential impacts of future growth under each alternative is not completed at this time, when will they be completed?

King County could have used data from the following state agencies to complete a quantitative analysis: Department of Natural Resources, Department of Ecology, Department of Fisheries, and the Department of Wildlife to determine existing conditions for environmental sensitive areas. These agencies have data available regarding the acreage of wetland losses and forest land conversions, the number and location of Superfund sites, the number and location of water quality limited segments under Section 303(d) of the Clean Water Act, the number and general location of threatened and endangered species of flora and fauna, including salmonid stocks.

King County's own Surface Water Management Division has completed river basin plans that include an initial assessment of existing conditions, problems, and recommendations. King County also has mapped the majority of the sensitive areas within the unincorporated areas. These data sources should have been used to determine impacts to the affected environment, particularly in a watershed context.

In general, controlling the sprawl of growth and development will relies not just on regulatory and non-regulatory means, but also changes in human behavior. Does King County know of any examples where growth and development has been controlled? If there are no examples, then how will growth be managed in King County or anywhere else in Washington?

NS-3

None of the alternatives were evaluated using all of the Growth Management Act goals. Goal number 8 specifically states to "maintain and enhance natural resource-based industries, including... fisheries". No where in the SDEIS were the impacts to the fisheries industry considered. Related to this is our concern that CPP CA-10 has not been implemented yet. King County should have consulted the Muckleshoot Indian Tribe before developing the five alternatives in this SDEIS to promote coordination of land use planning and the management of fish and wildlife resources.

NS-6

NS-16

Furthermore, none of the alternatives considered impacts to water quantity, including reductions in baseflows in the County's major river basins. Second, the SDEIS does not consider the historical impacts to sensitive areas that will continue under the all alternatives, thus never really addresses cumulative impacts.

We appreciate the opportunity to comment on this DSEIS and your attention to our concerns. If you have any questions, please contact Karen Walter or myself at 931-0632.

Sincerely,

Chantal Stevens

Chantal Stevens
Chief
Environmental Division

Enclosures

Muckleshoot Indian Tribe's Environmental Division Comments to King County's DSEIS

Introduction

1. We disagree with the statement on page 3 that the "these [employment and household growth] targets are allocated to broadly defined areas, rather than discrete areas that would allow quantitative analysis such as by jurisdictions". On page 18, the SEIS states that "the City of Seattle represented about one-third of available urban residential capacity countywide. In unincorporated King County, the Soos Creek community planning area contained more urban residential capacity than any other community planning area west of the urban-rural line (6% of the countywide urban total)". Both of these areas are discrete areas. Certainly some quantitative analysis could be completed based on size of these areas and data provided above.

2. On page 5, the SEIS indicates that the Countywide Planning Policies (CPPs) "state that no jurisdictions shall annex rural areas". If that is the case, why did the King County Council approve the annexation of rural land immediately adjacent to the City of Issaquah through its subsequent actions on October 4, 1993 and November 8, 1993?

3. The DSEIS does not indicate which alternative is the preferred alternative. Are we to assume that this decision will be made through this public process or will the GMPC make this decision?

Chapter 1.0 - Land Use

1. Land capacity as defined on page 16 is too narrow. Land capacity should be based on environmental constraints, not zoning designations when considered in an FEIS. According to the second paragraph on page 17, King County has received a considerable amount of land use data from cities and should have been able to do some quantitative analysis based on this information.

2. The DSEIS does not indicate whether or not the Data Forum incorporated vacancy rates in their land capacity analysis. The 5% vacancy rates mentioned on pages 22 and 23 are allowed rates and may not be actual vacancy rates. The vacancy rates should be updated in the FEIS.

3. The DSEIS does not indicate whether or not the net land capacity figures include building setbacks and losses of land due to increases in stormwater control measures such as larger retention/detention facilities to accommodate current and future stormwater pollution.

4. The first statement in paragraph 2 on page 21 is incorrect. Approximately 45% of the land within King County's 1200 square miles of forest production zone comprises is in federal ownership and may not be suitable for timber production due to wilderness status or other resource protection measures such as those outlined in the Forest Ecosystem Management Assessment Team's Report.

Commercial forest land has not remained relatively constant in King County since adoption of the resource land zoning in 1987 because there is a considerable proportion of the 26,000 acres of forest land outside of the forest production zone that is being converted to non-forest uses. An estimate of the forest land lost to development including residential and golf courses is missing from the DSEIS.

5. Historical and cultural sites within shoreline areas have been significantly reduced in terms of both the quality and amount due to growth pressures. These impacts were not identified on page 21.

Muckleshoot Indian Tribe's Environmental Division Comments to King County's DSEIS

Chapter 1.0 - Land Use (cont.)

6. On page 39, the DSEIS states that "recommended changes to land use in the five technical review areas around Renton and Issaquah would result in a cumulative shift of slightly more than one square mile from rural to urban designation". The environmental impacts associated with these changes were not assessed.

7. On page 48 and 49, there is no data concerning the amount of shoreline in each area; therefore, the impacts to shorelines in the urban, commercial/industry, rural, and resource areas have not been addressed.

8. On page 49, the DSEIS incorrectly indicates that shorelines would not be affected by the technical review areas.

9. Mitigation measure 1 (B) is inadequate and will not protect environmentally sensitive areas and will be inconsistent with FIS/Ed Policy ED-4. Such a measure is a policy that should be evaluated in terms of the impacts to the affected environment both direct and cumulatively.

Chapter 2.0 - Transportation

1. The DSEIS states that "the plan [Regional Transit System Plan] calls for coordinating land use and transit planning by three levels: regional-level, corridor-level, and community level". However, neither the DSEIS nor the Transit System Plan's FEIS considered the environmental impacts which will occur at all three levels as a result of increased growth.

Chapter 7.0 - Parks and Open Space

1. The second paragraph on page 120 is incorrect. King County does not have plentiful fish and wildlife compared to 10 or 100 years ago. If this were the case, then there would not be: 1 salmon stock (White River spring chinook) in critical condition, 7 salmon stocks in a depressed condition, various wildlife species on the state's Threatened and Endangered list that inhabit portions of King County.

2. Planned unit developments (PUDs) may offer some mitigation for impacts; however, those mitigation measures must be scrutinized against the impacts that such developments have before the PUDs themselves can be considered a mitigation measure. (Page 123)

Chapter 8.0 - Water Supply

1. The impacts of the alternatives should be considered in terms of the demand increases that cause reductions in baseflows which adversely affect beneficial uses as defined under the Clean Water Act. Because this chapter is missing in this analysis, it does not address the impacts to the affected environment, or the river and groundwater systems that contribute to public water supplies.

2. The data regarding rural cities and rural areas in the third paragraph on page 128 is inconsistent with Tables 1 and 2 in the introduction.

Muckleshoot Indian Tribe's Environmental Division Comments to King County's DSEIS

Chapter 9.0 - Stormwater Management

1. While the river planning effort conducted by King County may be to minimize adverse impacts to flooding as mentioned on page 133 of the SDEIS, the basin planning effort conducted by Surface Water Management attempts to achieve this goal and to protect the quality of natural resources such as fish and wildlife habitat, water quality, recreational and aesthetics qualities (Issaquah Creek Draft Basin and Non-point Action Plan, December, 1992).

It is the natural resources outlined above which may be adversely impacted by stormwater pollution and should be assessed accordingly in the SDEIS.

2. The assumption in the eighth paragraph on page 135 is substantial and should have been tested prior to the SEIS analysis. Several urban communities do not have any stormwater control facilities. Even areas using SWM designed facilities are not controlling 100% of the stormwater pollution problem, consequently, fish and wildlife habitat has been adversely affected by current development. According to Booth (1991), "for example, most of the populous jurisdictions in the Northwest require some form of stormwater detention for urban developments, yet they require that only part of the storm runoff be fully detained. The need for and nature of yet more stringent standards are only now being recognized in the technical community."¹

3. Based on the statement above and the fact that the CPPs call for development to have existing infrastructure sufficient to support growth and limit growth in other urban areas until adequate systems are in place, then the first sentence on page 137 is incorrect. The policies associated with the Pre-CPPs would result in adverse impacts drainage areas as a result of unmanaged and unmitigated stormwater pollution.

4. Because growth results in more impervious land surface and these increases in impervious surfaces can adversely affect natural hydrology, there are environmental impacts associated with increasing impervious surfaces which have not been identified under any alternative. Examples are: excessive runoff quantity, lost channel and corridor integrity and degraded water quality.

Chapter 10.0 Sewer/Septic

1. The impacts to the natural environment was not addressed in this chapter. There are environmental impacts associated with the construction and operation of septic and sewer systems which were not assessed in this SDEIS. Furthermore, the Urban Growth Area boundary as proposed has not been assessed for its impacts to the natural environment.

2. If sewer systems need to cross rural lands to get to service areas (page 144), what will keep those rural lands from becoming urban and serviced by sewers? The solution is not to modify RU-16, but rather to re-evaluate current sewer service centers and the proposed Urban Growth Boundary.

Chapter 11.0 Solid Waste

1. According to the SDEIS, "existing King County transfer stations lack capacity for projected waste quantities and that landfill capacity is expected to be exhausted in the next 20 to 30 years"

¹ Booth, D.B. 1991. "Urbanization and the Natural Drainage System, Impacts, Solutions, and Prognoses". The Northwest Environmental Journal, 7 : 93-118.

Muckleshoot Indian Tribe's Environmental Division Comments to King County's DSEIS

(page 146). The SDEIS does not include proposed locations for new transfer stations and landfills; therefore, the both the direct and cumulative impacts to the affected natural environment were not assessed.

Chapter 12.0 Utilities

1. The doubling of Puget Power's electrical load will have environmental impacts to the riverine systems which were not assessed (page 150).

Chapter 13.0 Sensitive Areas and Resource Lands

1. The second paragraph on page 155 is incorrect. King County's definitions of sensitive areas do not consider critical or necessary wildlife habitat. In addition, several streams within King County have not been evaluated for the presence or absence of salmonids. Third, the streams and wetlands identified in the Sensitive Areas Ordinance do not consider the historical use of such areas by fish and wildlife. For example, several streams are no longer inhabited by salmonids due to barriers, water quality degradation, and habitat destruction. Fourth, the Sensitive Areas Ordinance is only applicable for certain areas and properties developed after 1990 which does not necessarily coincide with critical habitat areas of fish and wildlife.

2. There are significant differences between the Sensitive Areas Ordinance and the State Forest Practices Act which are not being addressed under either regulation. Again the regulations do not necessarily protect habitat because these regulations were policy-driven, not biologically-driven.

3. From a cursory review of local jurisdictions' critical areas ordinances including Lake Forest Park and Black Diamond, these local ordinances are not as restrictive as King County's. Salmonid habitat cannot be viewed in a local context, rather it must be viewed initially in a watershed context and expanded to a region such as Puget Sound.

4. We concur with the statement that minimizing rural and resource land conversion would have the least impact on the majority of the remaining natural vegetation; however, we cannot agree with the statement that by minimizing rural and resource land conversions that the impacts to the overall integrity of the natural environment will be minimized (Page 157). There will be areas that are critical to salmonid production that will more than likely be adversely impacted by all alternatives.

An example is the Duwamish river. In the Green/Duwamish, only approximately 10% of its historic estuary wetland area remains. Estuaries are particularly important for juvenile coho and chinook salmon. Protecting habitat in the middle of the system will not insure perpetuation of salmonid species and the salmon fishing industry if the estuary area is allowed to be further developed as proposed by all alternatives. The SDEIS is inadequate in terms of examining the impacts to the salmonid and wildlife habitat to identify both positive and negative impacts as a result of each policy.

5. This chapter does not consider the potential listing of salmonid species under the Endangered Species Act which should have been used as a criteria to evaluate each policy alternative.

Muckleshoot Indian Tribe's Environmental Division Comments to King County's DSEIS

Chapter 13.0 Sensitive Areas and Resource Lands (cont.)

NS-9 6. The Sensitive Areas Ordinance is not a mitigation measure when variances and exemptions are granted in the interest of development. The overall integrity of the natural environment is compromised by such decisions. See comment number 1 in this section as well.

NS-19 7. The "benefits" derived from the proposed mitigation measures in this chapter need to be analyzed against the impacts to the natural environment incurred under each alternative. An urban planned unit development may provide on-site recreation areas but may impact water quality such that the benefits do not equal the impacts.

Chapter 15.0 - Water Quality

NS-22 1. We strongly disagree with the statement that "an assessment related to the overall impact of accommodating 215,000 households and 340,000 jobs in King County can only be made after more detailed analyses of groundwater, surface water, and comprehensive sewer plans are conducted on a regional basis". First, METRO has data concerning the water quality of most areas in King County which could be used to determine impacts to particular water bodies as a result of growth, both dispersed and concentrated. Second, the Department of Ecology indicates that there are 5 water quality limited segments in the Cedar/Sammamish basin, 6 segments in the Duwamish/Green, and 7 segments in the Puyallup/White (DOE, 1992 Statewide Water Quality Assessment 305(B) Report). The location of these segments could have been plotted and compared to where growth (urban centers and transit data for example) will go under each alternative to make a preliminary assessment as to how these segments would be affected by such policies.

Finally, in the sentence below, the SDEIS states that "existing wastewater and drainage systems are degrading water quality thresholds and extensive capital improvements will need to be made in some areas to accommodate growth and improve water quality". Would each alternative affect this situation the same way? Would one alternative (such as the eight or fourteen centers) be more likely to continue this degradation or not?

NS-22 2. Distribution of growth will not solely determine the amount of pollutants released into surface and ground waters. The amount of growth will also affect pollutant loading. (Page 173)

NS-23 3. Directing growth may not necessarily reduce impacts. For example, by concentrating housing into urban areas, future fecal coliform problems in some rural areas may be avoided; however, if there is not a reduction in the amount of vehicle use in the urban area, metal problems may increase causing new or increased water quality problems. Therefore, the assumption on page 176 may be invalid.

NS-22 4. As mentioned in previous remarks, there is data to indicate which areas are at or over capacity in terms of wastewater and stormwater. The SDEIS should have analyzed the alternatives and their impacts to these areas.

5. What data were used to support the statement on page 176 concerning Policy CC-8?

Muckleshoot Indian Tribe's Environmental Division Comments to King County's DSEIS

Chapter 15.0 -Water Quality (cont.)

6. According to Table 2 in the introduction, 34% of the future households will be located in non-urban center areas under the eight centers alternatives which means that the first sentence under this alternative (on page 176) is incorrect.

NS-22 7. We strongly disagree with the statement on page 177 that the 1985 Urban Growth line would have imperceptible impacts on water quality. If the Pre-Countywide Planning Policies and the UGA under the 1985 Comprehensive Plan are implemented, then there could be substantial impacts to water quality in the Green, White, and Cedar River basins as a result of dispersed growth.

NS-24 8. Water quality impacts will not be mitigated through proper planning, design, and implementation of wastewater and drainage system control measures alone for three reasons:

a) Monitoring and enforcement are critical to correcting water quality problems.

b) There is a generally a lag between identification of water quality problems and implementation of control measures.

c) BMPs and facilities do not address all impacts. For example retention/detention facilities address peak flow events but do not address the increases in water runoff velocity and duration. Both of these factors affect rearing salmonids. BMPs for construction activities do not control 100% of erosion and sediment runoff when such activities are conducted during October 1 to March 1.

Chapter 16.0 - Plants, Animals, and Fish

NS-9 1. The location of anadromous fish-bearing waters has not been determined as part of the development of Sensitive Areas ordinance. There are numerous "unclassified" streams or stream segments documented in the Sensitive Areas Map Portfolio (1990).

2. There are waters of importance to anadromous fish which were not listed on page 181. These include the estuary or salt-water influenced areas of the rivers mentioned as well as lakes such as Lake Washington and Lake Sammamish.

3. The last statement before the section on Seattle's Wildlife Habitat (page 181) is incorrect. Both mainstem rivers and tributaries provide essential spawning and rearing habitat.

NS-26 4. Again, concentrating growth in the western portion of King County may protect critical fish habitat in the rural and resource areas; however, there will be impacts to critical fish habitat in the urban areas, particularly in salt-water or estuary areas.

NS-9 5. Because there is no updated fish/wildlife/plant habitat inventory, the SDEIS is inadequate in assessing both the direct and cumulative impacts to these areas and the species associated with them. Statements such as "there are probably many wetlands that have been disturbed to such an extent that there are no longer significant wildlife or other wetlands values remaining" on page 185 cannot be stated without conclusive data. Therefore, tradeoffs between areas cannot be made.

Muckleshoot Indian Tribe's Environmental Division Comments to King County's DSEIS

Chapter 16.0 Plants, Animals, and Fish

6. The unavoidable impacts to plant, fish, and wildlife identified on page 186 may have treaty right implications. King County should explicitly recognize these implications in the FEIS.

The SDEIS does not consider impacts to historical and cultural sites under each alternative as required under both SEPA and GMA.



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FEB 23 1994

February 25, 1994

Lisa Majdiak
King County Planning and Community
Development Division
707 Smith Tower Building
506 Second Ave.
Seattle, WA 98104

RE: Draft Supplemental Environmental Impact Statement for the King County
Countywide Planning Policies

Dear Lisa:

On behalf of the City of Kirkland, Department of Planning and Community Development, I would like to offer the following comments regarding the Draft Supplemental Environmental Impact Statement (DSEIS).

We would concur that the 8 and 14 Centers Alternatives would result in the fewest negative environmental impacts by concentrating development within the urban growth boundary. These two alternatives would provide greater beneficial impacts on the environment in the areas of transportation (fewer vehicle trips), air quality, transit, and the consumption of land.

We are concerned that the predominant focus of the DSEIS is on urban centers. It is not clear what is the basis for the definition of an urban center or how the definition matches the policy objectives of concentrating urban growth.

The Countywide Planning Policies also contains several policies regarding urban growth outside of centers. Most new growth will not occur in urban centers. The DSEIS should recognize a broader range of centers (e.g. what is the role of Activity Areas as noted in the Countywide Planning Policies? How will "activity areas" help achieve objectives?). Perhaps a review of Vision 2020 could provide some guidance on this. The DSEIS should also demonstrate consistency with adopted regional plans.

These smaller centers as noted in the Countywide Planning Policies should promote the same concepts: concentrated development, mixed uses, transit and pedestrian supportive. These should be recognized as having a significant role in countywide growth management. We encourage a second look at the definition and criteria for urban centers as well as additional attention to activity areas or a hierarchy of centers.

DSEIS
February 25, 1994
Page 2

In reference to affordable housing, the DSEIS is a good beginning. However, it appears that considerable additional analysis is warranted. One or two case studies may be helpful as well as identifying those strategies or mitigation measures that have the best chance for success.

Thank you for the opportunity to comment. We understand the complexity of these issues and would be willing to assist or participate in any discussion on these points.

Sincerely,

PLANNING & COMMUNITY DEVELOPMENT



Paul D. Stewart AICP
Deputy Planning Director

cc Eric Shields, Planning Director
Lauri Anderson, Planning Supervisor
Nancy Cox, Planning Supervisor

B:GM022594



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Phone/Fax (206) 525-7236

Pat Strodel, Project Coordinator
Lucy Steers, Clerk

Coalition of Washington Communities

Downtown Human Services Coalition

Economic Development Council of
Seattle & King County

King County Council

King County Labor Council

League of Women Voters
of King County

League of Women Voters of Seattle

Master Builders Association of King
and Snohomish Counties

METRO

Municipal League of King County

Neighborhood Business Council

Puget Sound Regional Council

Seattle City Council

Seattle Community Council Federation

Seattle-King County
Realtors Association

Seattle Mayor's Planning Board

Seattle Neighborhood Coalition

Sierra Club

Soundings Board

Southeast Effective Development
(SEED)

UDDA Friends of Washington

Urban Seattle

Cynthia, Jim & Donna -
Dear Local Planner,

Do you ever get the feeling that people are talking about subjects you wish you could plug into and use in making choices for local policy decisions? As you go about the business of planning for a better region, do you have questions you wish you could ask real folks? Are you as tired about attending boring meetings where the same few people say the same things about local issues?

Conversations About the Future is a collaborative effort by many groups and individuals who are seeking to add to the conversations about growth management, transportation, neighborhood quality, environmental priorities, and controlling crime in our communities.

The premise of "Conversations" is to bring people with varying backgrounds, expertises, and interests to the same table to talk about the choices we truly have in planning a better future. We all do have to live together in this space we call the greater Seattle area, and our hope is to address the real options we have in growing towards the 21st century.

Towards that end, we have begun an ambitious program of soliciting input from residents in the four county region -- King, Kitsap, Snohomish and Pierce. We've produced a questionnaire which we've included here, and received more than 1,500 responses from mailings generated from METRO, King County, the Seattle Times and some 20 groups who have participated in the program to date. We also put together an hourlong show on KCTS which aired in December and will be replayed on Cable Access during March.

What we've found is probably not news to you, but we can offer some interesting insights. First, we asked questions based upon five themes:

- what we value about where we live
- what we fear might be eroding those values
- our attitudes towards more people moving into our neighborhoods
- practical transportation options
- where economic development fits into our value system

The results (enclosed) revealed strong values tied to our environment. About two-thirds of the respondents named the environment as one of their three top values. Other reasons to be in this region included family ties, neighborhood quality, the independent spirit of the Northwest and good jobs. Perhaps as telling were the values that people thought were not representative of the area. "Good place to raise children" only got 15%, and only 8% thought they felt safe here.

Regarding the major concerns, the two overwhelming choices were "too much random crime and violence" and "not able to get around; stressful traffic congestion." Job security and not being able to own a house of one's own rated the last major concerns at 14% each, but affordability rose to third highest value among renters and young people.

When it came to the best mobility options, almost half the questionnaires reflected a need to improve and expand a regional rapid rail system. There were of the respondents who thought the best transportation options should include more frequent bus service in their neighborhood.

Improvements to regional economic vitality were rated on a scale of one to five, with protecting our natural environment and resources rating highest; investing in our school systems rated second, with ensuring a stable and fair tax environment coming next.

A powerful minority voice emerged in our responses in concern about government regulation (often accompanied with a written comment about waste, too much government, liberalism, and ineffective reform). Interestingly, those who listed government regulation as a top concern, still listed environment positively over 50% of the time.

Most thought their own neighborhood could not absorb ANY more people without the standard of living deteriorating.

This questionnaire was just the start of our efforts to begin an ongoing conversation with families about the problems and options they talk about in their homes.

We told them we would let you know what they said as a whole *and for your ZIP code, and ask you to respond as your part of the conversation...* Please consider this letter the start of our conversation with you. *We've included a response form to allow you to respond to the results.*

However, since the entire point of "Conversations" is about talking past the quick answers and the multiple choices, we want to invite you to be a part of the next conversation. Are there questions you would ask folks if you were invited to a hundred kitchen tables? What questions would help you better plan for the future as you look at your own job? *After viewing the results, are there contradictions and/or conflicts that bear further discussion?*

Please take a moment to look over the past results. And, if you're as intrigued as we are with this *new kind* of public process, please get out your pen and paper, computer, fax machine or telephone and give us your thoughts.

Currently we are in the planning stages for the next two questionnaires and KCTS television shows. We thought we would use a theme which takes us from lifestyle choices to housing needs to local planning ideals. We'd touch upon housing -- and the value of homes which reflect lifestyles of the 90's -- as housing relates to population growth and the quality of our neighborhoods, increased public safety concerns, and accommodating employment and transportation needs.

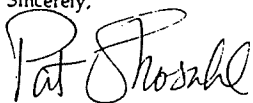
What do you think?

This letter is going to more than 500 planners who work for city, county, state, and federal agencies in addition to other planners *and elected officials* who are intimately involved in planning for the region's future. We need you.

Please give us some feedback and join the conversation. Our goal is to make local decision-making more inclusive, but in concert with your ongoing efforts.

Thank you.

Sincerely,



Pat Strosahl, Project Director

*P.S. Consider this a comment on the
Environmental Impact Statement!*

PLANNING WITH PLANNERS

Survey Within A Survey

As we mentioned in the letter accompanying this survey, we've begun a Conversation About the Future with more than 1,600 people in the four-county region. We asked them about growth management, neighborhood density, values that brought them (and keep them) here, as well as the concerns they have about how we're growing.

Our hope is to reach new people who don't usually avail themselves of traditional public processes, and make it easier for them to speak once and have their thoughts get to the right place to make a difference.

Care to help? We'd very much like your thoughts and responses.

1. First of all, what planning efforts are you involved with now?
2. What kind of public process have you already participated in and what was the format?
3. What do you think about the results from our survey? Are they in keeping with what you have been finding out? Are there any differences?
4. What is most significant about the results we found? Can you think of any way in which these results could help the direction you're taking?
5. People from our survey seemed particularly concerned about government keeping up with its obligations -- and they are worried that growth is the main driver of the continual deterioration of the environment, which they hold most dear. Given what the Growth Management Act requires, how do your plans accommodate both public concerns and the state mandate?
6. People are feeling unsafe; crime is on everyone's list of critical concerns. How do your plans accommodate issues of crime prevention and public safety?

7. Environmental protection, good schools, and stable taxation policy appear to be the foundation of what people think is a healthy economy? How are you accommodating those concerns in your plan?
8. Based upon your own reading of the survey, are there any circumstances, decisions, plans or policies you can identify that are in keeping with what these results revealed? If so, would you be willing to explain these to our public committee, the press or on our next TV shows?
9. We're thinking of making our next theme lifestyle choices, which will take us from housing needs to local planning ideals. Housing and the value of homes which reflect lifestyles of the '90's may lead us to questions surrounding population growth, the quality of our neighborhoods, increased public safety concerns, and accommodating the changing employment and transportation needs. Will this area of inquiry be of any interest or relevance to you? If so, how would you explore it?
10. In addition to the proposed emphasis of the next survey, a hundred coffee klatches, and the next show on KCTS (on April 24th at 7 p.m.), what subject area or questions would you ask of thousands of local residents?

A.

B.

C.

Thank you for your time and attention. Please feel free to add any comments you wish on the back of this form.

Name _____
 Job Position _____
 Address _____

Please return this form to: Conversations about the Future, 500 Wall St. Suite 410, Seattle 98121

PLANNING WITH PLANNERS

Survey Within A Survey

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A.

B.

C.

Thank you for your time and attention. Please feel free to add any comments you wish on the back of this form.

Name _____

Job Position _____

Address _____

Please return this form to: Conversations about the Future, 500 Wall St. Suite 410, Seattle 98121



Total Tabulations (w/percentages)

Total returned questionnaires 1651 Times 50 Neighborhood 11 Eastside 1194 METRO 116 Coffee

Sex 843 male 746 female Age 97 18-29 322 30-39 417 40-49 482 50-64 298 65 or older Own or rent 1328 own 284 rent

Lifestyle 130 rural 591 suburban 914 urban Resided here 140 less than 5 years 354 5-15 1119 over 15

anonymous 505 31.9%

1. Positive values

505	I have a good job.	30.6%
665	My family lives here.	40.3%
141	I feel safe: Sense of security is better here	8.5%
1084	I like the environment-recreation here.	65.7%
255	It's a good place for children to grow up.	15.4%
629	I like the quality of life in my neighborhood	38.1%
562	The independent spirit of the Pacific Northwest	34.0%
301	Opportunities for the future are good here.	18.2%
256	Every place else I look seems worse.	15.5%
441	The artistic and cultural life of the region.	26.7%

2. Major Concerns

632	Too many people in one place	38.3%
128	I don't feel like I belong; not enough community	7.8%
279	Too much government interference in life/property	16.9%
408	Taxes	24.7%
359	Ugly streets, buildings/ deterioration of neighborhood	21.7%
235	Can't afford to own the kind of home I want	14.2%
1034	Too much crime and random violence	62.6%
1003	Not able to get around; stressful traffic congestion	60.8%
232	Not enough good jobs	14.1%

3. How many more people in your neighborhood? ☐ none ☒ few ☐ some ☐ lots

702 564 279 71

42.6% 34.2% 16.9% 4.3%

4. Best mobility Options

533	More frequent bus service in my neighborhood	32.3%
406	Commuter rail on existing train tracks	24.6%
223	Living closer to where I work	13.5%
282	Bicycle lanes and more bike facilities on bike	17.1%
218	More carpool lanes/carpooling and vanpool	13.2%
807	A regional rapid rail system	48.9%
420	Improvements to our current road system	25.4%
85	Trolleys and/or low speed multi-stop rail	6.5%

5. Economic Vitality (1-5)

4.02	A. Invest in roads, transit & new technology
4.37	B. Protect our natural environment and resources
3.49	C. Work to attract globally competitive industries
3.55	D. Affordable housing in attractive neighborhoods
3.34	E. Government regulation doesn't hinder business
4.05	F. Ensure a stable and fair tax system
4.22	G. Invest in our school systems

Report by Source of Questionnaire **Coffee**

(percentages listed on left are total for all questionnaires, boxed percentages for the particular set)

Total returned 116 questionnaires		Age		Resided here	
anonymous returns 31.9% 4.3%	7.9% rural 24.1%	5.9% 18-29 2.6%	8.5% less than 5 years 10.4%		
	35.8% suburban 29.3%	19.5% 30-39 17.4%	21.5% 5-15 26.1%		
	55.4% urban 46.6%	25.3% 40-49 25.2%	67.9% over 15 61.7%		
51.2% male 49.6%		29.2% 50-64 33.0%	80.7% own 88.5%		
45.3% female 47.8%		18.1% 65 or older 20.0%	17.3% rent 11.5%		

1. Positive values

- 30.6% **15.5%** have a good job.
- 40.3% **40.5%** My family lives here.
- 8.5% **19.8%** feel safe: Sense of security is better here.
- 65.7% **65.5%** like the environment-recreation here.
- 15.4% **30.2%** It's a good place for children to grow up.
- 38.1% **53.4%** like the quality of life in my neighborhood.
- 34% **30.2%** The independent spirit of the Pacific Northwest
- 18.2% **19.0%** Opportunities for the future are good here.
- 15.5% **14.7%** Every place else I look seems worse.
- 26.7% **26.7%** The artistic and cultural life of the region.

2. Major Concerns

- 38.3% **36.2%** Too many people in one place
- 7.8% **7.8%** I don't feel like I belong; not enough community spirit
- 16.9% **26.7%** Too much government interference in life/property
- 24.7% **35.3%** Taxes
- 21.7% **19.0%** Ugly streets, buildings/ deterioration of neighborhood
- 14.2% **12.9%** Can't afford to own the kind of home I want
- 62.6% **53.4%** Too much crime and random violence
- 60.8% **49.1%** Not able to get around; stressful traffic congestion
- 14.1% **18.1%** Not enough good jobs

3. How many more people in your neighborhood?

- 42.6% none **33.6%**
- 34.2% few **38.8%**
- 16.9% some **23.3%**
- 4.3% lots **3.4%**

4. Best mobility Options

- 32.3% **36.2%** More frequent bus service in my neighborhood
- 24.6% **29.3%** Commuter rail on existing train tracks
- 13.5% **15.5%** Living closer to where I work
- 17.1% **12.9%** Bicycle lanes and more bike facilities on buses
- 13.2% **20.7%** More carpool lanes/carpooling and vanpooling
- 48.9% **50.9%** A regional rapid rail system
- 25.4% **22.4%** Improvements to our current road system
- 6.5% **5.4%** Trolleys and/or low speed multi-stop rail

5. Economic Vitality (1-5)

- 4.02 **3.86** A. Invest in roads, transit & new technology
- 4.36 **4.46** B. Protect our natural environment and resources
- 3.49 **3.39** C. Work to attract globally competitive industries
- 3.55 **3.65** D. Affordable housing in attractive neighborhoods
- 3.34 **3.38** E. Government regulation doesn't hinder business
- 4.06 **4.20** F. Ensure a stable and fair tax system
- 4.22 **4.57** G. Invest in our school systems

Report by Source of Questionnaire **Eastside**

(percentages listed on left are total for all questionnaires, boxed percentages for the particular set)

Total returned 11 questionnaires		Age		Resided here	
anonymous returns 31.9% 70.0%	7.9% rural 18.2%	5.9% 18-29 0.0%	8.5% less than 5 years 9.1%		
	35.8% suburban 72.7%	19.5% 30-39 0.0%	21.5% 5-15 18.2%		
	55.4% urban 9.1%	25.3% 40-49 45.5%	67.9% over 15 72.7%		
51.2% male 18.2%		29.2% 50-64 36.4%	80.7% own 100.0%		
45.3% female 81.8%		18.1% 65 or older 9.1%	17.3% rent 0.0%		

1. Positive values

- 30.6% **27.3%** have a good job.
- 40.3% **45.5%** My family lives here.
- 8.5% **9.1%** feel safe: Sense of security is better here.
- 65.7% **81.8%** like the environment-recreation here.
- 15.4% **18.2%** It's a good place for children to grow up.
- 38.1% **9.1%** like the quality of life in my neighborhood.
- 34% **18.2%** The independent spirit of the Pacific Northwest
- 18.2% **9.1%** Opportunities for the future are good here.
- 15.5% **45.5%** Every place else I look seems worse.
- 26.7% **27.3%** The artistic and cultural life of the region.

2. Major Concerns

- 38.3% **72.7%** Too many people in one place
- 7.8% **0.0%** I don't feel like I belong; not enough community spirit
- 16.9% **9.1%** Too much government interference in life/property
- 24.7% **18.2%** Taxes
- 21.7% **18.2%** Ugly streets, buildings/ deterioration of neighborhood
- 14.2% **0.0%** Can't afford to own the kind of home I want
- 62.6% **72.7%** Too much crime and random violence
- 60.8% **81.8%** Not able to get around; stressful traffic congestion
- 14.1% **0.0%** Not enough good jobs

3. How many more people in your neighborhood?

- 42.6% none **63.6%**
- 34.2% few **18.2%**
- 16.9% some **18.2%**
- 4.3% lots **0.0%**

4. Best mobility Options

- 32.3% **45.5%** More frequent bus service in my neighborhood
- 24.6% **18.2%** Commuter rail on existing train tracks
- 13.5% **9.1%** Living closer to where I work
- 17.1% **0.0%** Bicycle lanes and more bike facilities on buses
- 13.2% **36.4%** More carpool lanes/carpooling and vanpooling
- 48.9% **45.5%** A regional rapid rail system
- 25.4% **18.2%** Improvements to our current road system
- 6.5% **0.0%** Trolleys and/or low speed multi-stop rail

5. Economic Vitality (1-5)

- 4.02 **3.27** A. Invest in roads, transit & new technology
- 4.36 **4.64** B. Protect our natural environment and resources
- 3.49 **2.25** C. Work to attract globally competitive industries
- 3.55 **3.56** D. Affordable housing in attractive neighborhoods
- 3.34 **2.25** E. Government regulation doesn't hinder business
- 4.06 **3.45** F. Ensure a stable and fair tax system
- 4.22 **3.30** G. Invest in our school systems



Report by Source of Questionnaire **METRO**

(percentages listed on left are total for all questionnaires, boxed percentages for the particular set)

Total returned questionnaires 1195

anonymous returns 31.9% **25.6%**

51.2% male **52.4%**
45.3% female **44.2%**

7.9% rural **7.0%**
35.8% suburban **35.8%**
55.4% urban **56.2%**

Age	Resided here
5.9% 18-29 6.5%	8.5% less than 5 years 8.2%
19.5% 30-39 20.2%	21.5% 5-15 21.8%
25.3% 40-49 24.8%	67.9% over 15 68.4%
29.2% 50-64 28.4%	80.7% own 79.7%
18.1% 65 or older 18.3%	17.3% rent 18.1%

1. Positive values

30.6% **33.6%** have a good job.
40.3% **40.2%** My family lives here.
8.5% **7.5%** feel safe: Sense of security is better here.
65.7% **66.2%** like the environment-recreation here.
15.4% **15.1%** It's a good place for children to grow up.
38.1% **37.5%** like the quality of life in my neighborhood.
34% **33.1%** The independent spirit of the Pacific Northwest
18.2% **19.3%** Opportunities for the future are good here.
15.5% **14.5%** Every place else I look seems worse.
26.7% **26.5%** The artistic and cultural life of the region.

2. Major Concerns

38.3% **36.9%** Too many people in one place
7.8% **8.5%** I don't feel like I belong; not enough community spirit
16.9% **16.2%** Too much government interference in life/property
24.7% **23.4%** Taxes
21.7% **21.8%** Ugly streets, buildings/ deterioration of neighborhood
14.2% **14.6%** Can't afford to own the kind of home I want
62.6% **62.8%** Too much crime and random violence
60.8% **61.1%** Not able to get around; stressful traffic congestion
14.1% **13.1%** Not enough good jobs

3. How many more people in your neighborhood?

42.6% none **42.2%**
34.2% few **33.3%**
16.9% some **17.4%**
4.3% lots **4.8%**

4. Best mobility Options

32.3% **32.2%** More frequent bus service in my neighborhood
24.6% **24.5%** Commuter rail on existing train tracks
13.5% **13.4%** Living closer to where I work
17.1% **18.1%** Bicycle lanes and more bike facilities on buses
13.2% **13.0%** More carpool lanes/carpooling and vanpooling
48.9% **50.0%** A regional rapid rail system
25.4% **25.5%** Improvements to our current road system
6.5% **6.6%** Trolleys and/or low speed multi-stop rail

5. Economic Vitality (1-5)

4.02 **4.14** A. Invest in roads, transit & new technology
4.36 **4.37** B. Protect our natural environment and resources
3.49 **3.53** C. Work to attract globally competitive industries
3.55 **3.57** D. Affordable housing in attractive neighborhoods
3.34 **3.33** E. Government regulation doesn't hinder business
4.06 **4.05** F. Ensure a stable and fair tax system
4.22 **4.24** G. Invest in our school systems



Questionnaire Tabulation Report by Lifestyle: **rural**

(percentages listed on left are total for all questionnaires, boxed percentages for the particular set)

Total returned questionnaires 130

anonymous returns 31.9% **23.4%**

51.2% male **56.6%**
45.3% female **42.6%**

Source	Age	Resided here
16.9% Times 12.3%	5.9% 18-29 4.7%	8.5% less than 5 years 4.7%
3.0% Neighborhood 0.0%	19.5% 30-39 20.2%	21.5% 5-15 23.3%
0.7% Eastside 1.5%	25.3% 40-49 28.7%	67.9% over 15 71.3%
72.3% METRO 64.6%	29.2% 50-64 29.5%	80.7% own 89.9%
7.0% Coffee 21.5%	18.1% 65 or older 14.0%	17.3% rent 6.2%

1. Positive values

30.6% **26.9%** have a good job.
40.3% **46.9%** My family lives here.
8.5% **16.2%** feel safe: Sense of security is better here.
65.7% **63.8%** like the environment-recreation here.
15.4% **26.2%** It's a good place for children to grow up.
38.1% **44.6%** like the quality of life in my neighborhood.
34% **30.8%** The independent spirit of the Pacific Northwest
18.2% **13.8%** Opportunities for the future are good here.
15.5% **10.0%** Every place else I look seems worse.
26.7% **12.3%** The artistic and cultural life of the region.

2. Major Concerns

38.3% **42.3%** Too many people in one place
7.8% **3.1%** I don't feel like I belong; not enough community spirit
16.9% **36.2%** Too much government interference in life/property
24.7% **42.3%** Taxes
21.7% **13.8%** Ugly streets, buildings/ deterioration of neighborhood
14.2% **6.9%** Can't afford to own the kind of home I want
62.6% **50.8%** Too much crime and random violence
60.8% **60.0%** Not able to get around; stressful traffic congestion
14.1% **13.8%** Not enough good jobs

3. How many more people in your neighborhood?

42.6% none **44.2%**
34.2% few **31.8%**
16.9% some **17.8%**
4.3% lots **3.9%**

4. Best mobility Options

32.3% **31.5%** More frequent bus service in my neighborhood
24.6% **28.5%** Commuter rail on existing train tracks
13.5% **16.9%** Living closer to where I work
17.1% **13.1%** Bicycle lanes and more bike facilities on buses
13.2% **22.3%** More carpool lanes/carpooling and vanpooling
48.9% **46.9%** A regional rapid rail system
25.4% **30.8%** Improvements to our current road system
6.5% **2.6%** Trolleys and/or low speed multi-stop rail

5. Economic Vitality (1-5)

4.02 **3.81** A. Invest in roads, transit & new technology
4.36 **4.18** B. Protect our natural environment and resources
3.49 **3.33** C. Work to attract globally competitive industries
3.55 **3.26** D. Affordable housing in attractive neighborhoods
3.34 **3.50** E. Government regulation doesn't hinder business
4.06 **4.09** F. Ensure a stable and fair tax system
4.22 **3.93** G. Invest in our school systems

Questionnaire Tabulation Report by Lifestyle: **suburban**

(percentages listed on left are total for all questionnaires, boxed percentages for the particular set)

	Source	Age	Resided here
Total returned questionnaires 591	16.9% Times 20.1%	5.9% 18-29 4.6%	8.5% less than 5 years 8.6%
anonymous returns 31.9% 30.4%	3.0% Neighborhood 0.3%	19.5% 30-39 17.4%	21.5% 5-15 21.7%
	0.7% Eastside 1.4%	25.3% 40-49 25.0%	67.9% over 15 68.5%
	72.3% METRO 72.3%	29.2% 50-64 33.7%	80.7% own 87.8%
51.2% male 57.5%	7.0% Coffee 5.8%	18.1% 65 or older 18.3%	17.3% rent 11.2%
45.3% female 40.2%			

1. Positive values

- 30.6% **34.9%** have a good job.
- 40.3% **43.1%** My family lives here.
- 8.5% **8.1%** feel safe: Sense of security is better here.
- 65.7% **68.4%** like the environment-recreation here.
- 15.4% **19.0%** It's a good place for children to grow up.
- 38.1% **33.7%** like the quality of life in my neighborhood.
- 34% **33.2%** The independent spirit of the Pacific Northwest
- 18.2% **19.0%** Opportunities for the future are good here.
- 15.5% **16.9%** Every place else I look seems worse.
- 26.7% **21.3%** The artistic and cultural life of the region.

2. Major Concerns

- 38.3% **41.3%** Too many people in one place
- 7.8% **8.3%** I don't feel like I belong; not enough community spirit
- 16.9% **21.3%** Too much government interference in life/property
- 24.7% **32.0%** Taxes
- 21.7% **13.7%** Ugly streets, buildings/ deterioration of neighborhood
- 14.2% **11.3%** Can't afford to own the kind of home I want
- 62.6% **61.3%** Too much crime and random violence
- 60.8% **64.8%** Not able to get around; stressful traffic congestion
- 14.1% **12.7%** Not enough good jobs

3. How many more people in your neighborhood?

- 42.6% none **45.4%**
- 34.2% few **34.9%**
- 16.9% some **15.3%**
- 4.3% lots **2.7%**

4. Best mobility Options

- 32.3% **33.3%** More frequent bus service in my neighborhood
- 24.6% **26.1%** Commuter rail on existing train tracks
- 13.5% **16.2%** Living closer to where I work
- 17.1% **10.3%** Bicycle lanes and more bike facilities on buses
- 13.2% **15.7%** More carpool lanes/carpooling and vanpooling
- 48.9% **49.7%** A regional rapid rail system
- 25.4% **30.6%** Improvements to our current road system
- 6.5% **3.3%** Trolleys and/or low speed multi-stop rail

5. Economic Vitality (1-5)

- 4.02 **4.03** A. Invest in roads, transit & new technology
- 4.36 **4.24** B. Protect our natural environment and resources
- 3.49 **3.50** C. Work to attract globally competitive industries
- 3.55 **3.36** D. Affordable housing in attractive neighborhoods
- 3.34 **3.50** E. Government regulation doesn't hinder business
- 4.06 **4.07** F. Ensure a stable and fair tax system
- 4.22 **4.17** G. Invest in our school systems

Questionnaire Tabulation Report by Lifestyle: **urban**

(percentages listed on left are total for all questionnaires, boxed percentages for the particular set)

	Source	Age	Resided here
Total returned questionnaires 914	16.9% Times 15.3%	5.9% 18-29 6.9%	8.5% less than 5 years 9.1%
anonymous returns 31.9% 33.7%	3.0% Neighborhood 5.3%	19.5% 30-39 21.0%	21.5% 5-15 21.3%
	0.7% Eastside 0.1%	25.3% 40-49 25.3%	67.9% over 15 67.5%
	72.3% METRO 73.4%	29.2% 50-64 26.7%	80.7% own 75.7%
51.2% male 47.0%	7.0% Coffee 5.9%	18.1% 65 or older 18.6%	17.3% rent 22.9%
45.3% female 49.1%			

1. Positive values

- 30.6% **28.4%** have a good job.
- 40.3% **37.6%** My family lives here.
- 8.5% **7.5%** feel safe: Sense of security is better here.
- 65.7% **64.6%** like the environment-recreation here.
- 15.4% **11.7%** It's a good place for children to grow up.
- 38.1% **39.7%** like the quality of life in my neighborhood.
- 34% **35.4%** The independent spirit of the Pacific Northwest
- 18.2% **18.6%** Opportunities for the future are good here.
- 15.5% **15.2%** Every place else I look seems worse.
- 26.7% **32.3%** The artistic and cultural life of the region.

2. Major Concerns

- 38.3% **36.0%** Too many people in one place
- 7.8% **8.2%** I don't feel like I belong; not enough community spirit
- 16.9% **11.3%** Too much government interference in life/property
- 24.7% **17.4%** Taxes
- 21.7% **28.1%** Ugly streets, buildings/ deterioration of neighborhood
- 14.2% **17.0%** Can't afford to own the kind of home I want
- 62.6% **65.2%** Too much crime and random violence
- 60.8% **58.3%** Not able to get around; stressful traffic congestion
- 14.1% **14.8%** Not enough good jobs

3. How many more people in your neighborhood?

- 42.6% none **40.5%**
- 34.2% few **34.0%**
- 16.9% some **18.1%**
- 4.3% lots **5.5%**

4. Best mobility Options

- 32.3% **31.9%** More frequent bus service in my neighborhood
- 24.6% **22.8%** Commuter rail on existing train tracks
- 13.5% **11.4%** Living closer to where I work
- 17.1% **22.2%** Bicycle lanes and more bike facilities on buses
- 13.2% **10.4%** More carpool lanes/carpooling and vanpooling
- 48.9% **48.5%** A regional rapid rail system
- 25.4% **21.2%** Improvements to our current road system
- 6.5% **9.4%** Trolleys and/or low speed multi-stop rail

5. Economic Vitality (1-5)

- 4.02 **4.04** A. Invest in roads, transit & new technology
- 4.36 **4.47** B. Protect our natural environment and resources
- 3.49 **3.50** C. Work to attract globally competitive industries
- 3.55 **3.71** D. Affordable housing in attractive neighborhoods
- 3.34 **3.21** E. Government regulation doesn't hinder business
- 4.06 **4.04** F. Ensure a stable and fair tax system
- 4.22 **4.30** G. Invest in our school systems

Questionnaire Tabulation Report by Homeownership: **own**

(percentages listed on left are total for all questionnaires, boxed percentages for the particular set)

Total returned questionnaires 1324		Source		Age		Resided here	
		16.9% Times	17.5%	5.9% 18-29	2.4%	8.5% less than 5 years	4.6%
anonymous returns 31.9% 32.9%		3.0% Neighborhood	2.4%	19.5% 30-39	17.5%	21.5% 5-15	20.7%
		0.7% Eastside	0.8%	25.3% 40-49	26.6%	67.9% over 15	73.4%
51.2% male 52.3%		72.3% METRO	71.6%	29.2% 50-64	33.0%	7.9% rural 8.8%	52.2%
45.3% female 44.5%		7.0% Coffee	7.6%	18.1% 65 or older 19.3%		35.8% suburban 39.0%	55.4%

1. Positive values

- 30.6% 31.4% have a good job.
- 40.3% 42.3% My family lives here.
- 8.5% 8.4% feel safe: Sense of security is better here.
- 65.7% 66.5% like the environment-recreation here.
- 15.4% 16.8% It's a good place for children to grow up.
- 38.1% 39.4% like the quality of life in my neighborhood.
- 34% 31.9% The independent spirit of the Pacific Northwest
- 18.2% 16.8% Opportunities for the future are good here.
- 15.5% 15.3% Every place else I look seems worse.
- 26.7% 25.1% The artistic and cultural life of the region.

2. Major Concerns

- 38.3% 40.0% Too many people in one place
- 7.8% 6.4% I don't feel like I belong; not enough community spirit
- 16.9% 18.7% Too much government interference in life/property
- 24.7% 27.8% Taxes
- 21.7% 21.0% Ugly streets, buildings/ deterioration of neighborhood
- 14.2% 8.0% Can't afford to own the kind of home I want
- 62.6% 64.0% Too much crime and random violence
- 60.8% 61.6% Not able to get around; stressful traffic congestion
- 14.1% 13.1% Not enough good jobs

3. How many more people in your neighborhood?

- 42.6% none 43.6%
- 34.2% few 35.1%
- 16.9% some 15.9%
- 4.3% lots 3.6%

4. Best mobility Options

- 32.3% 31.9% More frequent bus service in my neighborhood
- 24.6% 23.8% Commuter rail on existing train tracks
- 13.5% 13.5% Living closer to where I work
- 17.1% 15.8% Bicycle lanes and more bike facilities on buses
- 13.2% 13.6% More carpool lanes/carpooling and vanpooling
- 48.9% 47.1% A regional rapid rail system
- 25.4% 26.2% Improvements to our current road system
- 6.5% 5.5% Trolleys and/or low speed multi-stop rail

5. Economic Vitality (1-5)

- 4.02 4.00 A. Invest in roads, transit & new technology
- 4.36 4.34 B. Protect our natural environment and resources
- 3.49 3.49 C. Work to attract globally competitive industries
- 3.55 3.49 D. Affordable housing in attractive neighborhoods
- 3.34 3.40 E. Government regulation doesn't hinder business
- 4.06 4.10 F. Ensure a stable and fair tax system
- 4.22 4.21 G. Invest in our school systems

Questionnaire Tabulation Report by Homeownership: **rent**

(percentages listed on left are total for all questionnaires, boxed percentages for the particular set)

Total returned questionnaires 283		Source		Age		Resided here	
		16.9% Times	14.1%	5.9% 18-29	22.3%	8.5% less than 5 years	27.6%
anonymous returns 31.9% 28.1%		3.0% Neighborhood	5.3%	19.5% 30-39	30.4%	21.5% 5-15	26.1%
		0.7% Eastside	0.0%	25.3% 40-49	19.4%	67.9% over 15	44.5%
51.2% male 48.8%		72.3% METRO	76.0%	29.2% 50-64	14.1%	7.9% rural 2.8%	73.9%
45.3% female 49.8%		7.0% Coffee	4.6%	18.1% 65 or older 12.7%		35.8% suburban 23.3%	55.4%

1. Positive values

- 30.6% 27.6% have a good job.
- 40.3% 31.1% My family lives here.
- 8.5% 8.5% feel safe: Sense of security is better here.
- 65.7% 65.0% like the environment-recreation here.
- 15.4% 9.5% It's a good place for children to grow up.
- 38.1% 30.7% like the quality of life in my neighborhood.
- 34% 44.9% The independent spirit of the Pacific Northwest
- 18.2% 26.1% Opportunities for the future are good here.
- 15.5% 16.6% Every place else I look seems worse.
- 26.7% 35.0% The artistic and cultural life of the region.

2. Major Concerns

- 38.3% 30.7% Too many people in one place
- 7.8% 13.8% I don't feel like I belong; not enough community spirit
- 16.9% 8.1% Too much government interference in life/property
- 24.7% 9.9% Taxes
- 21.7% 25.1% Ugly streets, buildings/ deterioration of neighborhood
- 14.2% 42.8% Can't afford to own the kind of home I want
- 62.6% 56.9% Too much crime and random violence
- 60.8% 57.2% Not able to get around; stressful traffic congestion
- 14.1% 18.4% Not enough good jobs

3. How many more people in your neighborhood?

- 42.6% none 37.1%
- 34.2% few 31.4%
- 16.9% some 23.0%
- 4.3% lots 6.7%

4. Best mobility Options

- 32.3% 34.3% More frequent bus service in my neighborhood
- 24.6% 27.6% Commuter rail on existing train tracks
- 13.5% 14.1% Living closer to where I work
- 17.1% 24.7% Bicycle lanes and more bike facilities on buses
- 13.2% 11.3% More carpool lanes/carpooling and vanpooling
- 48.9% 57.2% A regional rapid rail system
- 25.4% 21.6% Improvements to our current road system
- 6.5% 11.8% Trolleys and/or low speed multi-stop rail

5. Economic Vitality (1-5)

- 4.02 4.12 A. Invest in roads, transit & new technology
- 4.36 4.53 B. Protect our natural environment and resources
- 3.49 3.46 C. Work to attract globally competitive industries
- 3.55 3.86 D. Affordable housing in attractive neighborhoods
- 3.34 3.08 E. Government regulation doesn't hinder business
- 4.06 3.83 F. Ensure a stable and fair tax system
- 4.22 4.29 G. Invest in our school systems



Questionnaire Tabulation
Report by Length of Residency: **less than 5 years**
(percentages listed on left are total for all questionnaires, boxed percentages for the particular set)

Source		Age					
Total returned questionnaires	140	16.9% Times	17.1%	5.9% 18-29	26.4%	80.7% own	43.9%
anonymous returns	31.9%	3.0% Neighborhood	3.6%	19.5% 30-39	35.7%	17.3% rent	56.1%
		0.7% Eastside	0.7%	25.3% 40-49	21.4%	7.9% rural	4.3%
		72.3% METRO	70.0%	29.2% 50-64	11.4%	35.8% suburban	36.4%
		7.0% Coffee	8.6%	18.1% 65 or older	5.0%	55% urban	59.3%
51.2% male	58.6%						
45.3% female	41.4%						

1. Positive values

- 30.6% [32.1%] have a good job.
- 40.3% [15.0%] My family lives here.
- 8.5% [6.4%] feel safe: Sense of security is better here.
- 65.7% [76.4%] like the environment-recreation here.
- 15.4% [9.3%] It's a good place for children to grow up.
- 38.1% [32.1%] like the quality of life in my neighborhood.
- 34% [32.1%] The independent spirit of the Pacific Northwest
- 18.2% [32.1%] Opportunities for the future are good here.
- 15.5% [12.9%] Every place else I look seems worse.
- 26.7% [37.1%] The artistic and cultural life of the region.

2. Major Concerns

- 38.3% [26.4%] Too many people in one place
- 7.8% [10.7%] I don't feel like I belong; not enough community spirit
- 16.9% [8.6%] Too much government interference in life/property
- 24.7% [14.3%] Taxes
- 21.7% [26.4%] Ugly streets, buildings/ deterioration of neighborhood
- 14.2% [29.3%] Can't afford to own the kind of home I want
- 62.6% [53.6%] Too much crime and random violence
- 60.8% [61.4%] Not able to get around; stressful traffic congestion
- 14.1% [17.1%] Not enough good jobs

3. How many more people in your neighborhood?

- 42.6% none [30.0%]
- 34.2% few [35.7%]
- 16.9% some [25.7%]
- 4.3% lots [7.1%]

4. Best mobility Options

- 32.3% [39.3%] More frequent bus service in my neighborhood
- 24.6% [22.9%] Commuter rail on existing train tracks
- 13.5% [12.9%] Living closer to where I work
- 17.1% [30.7%] Bicycle lanes and more bike facilities on buses
- 13.2% [14.3%] More carpool lanes/carpooling and vanpooling
- 48.9% [57.1%] A regional rapid rail system
- 25.4% [19.3%] Improvements to our current road system
- 6.5% [11.5%] Trolleys and/or low speed multi-stop rail

5. Economic Vitality (1-5)

- 4.02 [4.24] A. Invest in roads, transit & new technology
- 4.36 [4.50] B. Protect our natural environment and resources
- 3.49 [3.59] C. Work to attract globally competitive industries
- 3.55 [3.60] D. Affordable housing in attractive neighborhoods
- 3.34 [3.02] E. Government regulation doesn't hinder business
- 4.06 [3.72] F. Ensure a stable and fair tax system
- 4.22 [4.33] G. Invest in our school systems



Questionnaire Tabulation
Report by Length of Residency: **5-15**
(percentages listed on left are total for all questionnaires, boxed percentages for the particular set)

Source		Age					
Total returned questionnaires	354	16.9% Times	14.4%	5.9% 18-29	6.8%	80.7% own	77.9%
anonymous returns	31.9%	3.0% Neighborhood	3.1%	19.5% 30-39	35.9%	17.3% rent	21.0%
		0.7% Eastside	0.6%	25.3% 40-49	31.1%	7.9% rural	8.5%
		72.3% METRO	73.4%	29.2% 50-64	19.5%	35.8% suburban	36.2%
		7.0% Coffee	8.5%	18.1% 65 or older	6.5%	55% urban	55.1%
51.2% male	55.2%						
45.3% female	43.9%						

1. Positive values

- 30.6% [35.9%] have a good job.
- 40.3% [19.2%] My family lives here.
- 8.5% [10.7%] feel safe: Sense of security is better here.
- 65.7% [68.9%] like the environment-recreation here.
- 15.4% [18.6%] It's a good place for children to grow up.
- 38.1% [39.0%] like the quality of life in my neighborhood.
- 34% [30.8%] The independent spirit of the Pacific Northwest
- 18.2% [25.1%] Opportunities for the future are good here.
- 15.5% [14.4%] Every place else I look seems worse.
- 26.7% [30.8%] The artistic and cultural life of the region.

2. Major Concerns

- 38.3% [33.1%] Too many people in one place
- 7.8% [12.4%] I don't feel like I belong; not enough community spirit
- 16.9% [12.4%] Too much government interference in life/property
- 24.7% [18.4%] Taxes
- 21.7% [22.6%] Ugly streets, buildings/ deterioration of neighborhood
- 14.2% [19.5%] Can't afford to own the kind of home I want
- 62.6% [57.1%] Too much crime and random violence
- 60.8% [62.1%] Not able to get around; stressful traffic congestion
- 14.1% [15.3%] Not enough good jobs

3. How many more people in your neighborhood?

- 42.6% none [36.8%]
- 34.2% few [35.7%]
- 16.9% some [21.0%]
- 4.3% lots [5.4%]

4. Best mobility Options

- 32.3% [32.2%] More frequent bus service in my neighborhood
- 24.6% [23.2%] Commuter rail on existing train tracks
- 13.5% [17.8%] Living closer to where I work
- 17.1% [24.6%] Bicycle lanes and more bike facilities on buses
- 13.2% [11.6%] More carpool lanes/carpooling and vanpooling
- 48.9% [52.8%] A regional rapid rail system
- 25.4% [22.9%] Improvements to our current road system
- 6.5% [7.1%] Trolleys and/or low speed multi-stop rail

5. Economic Vitality (1-5)

- 4.02 [4.03] A. Invest in roads, transit & new technology
- 4.36 [4.43] B. Protect our natural environment and resources
- 3.49 [3.54] C. Work to attract globally competitive industries
- 3.55 [3.60] D. Affordable housing in attractive neighborhoods
- 3.34 [3.08] E. Government regulation doesn't hinder business
- 4.06 [3.94] F. Ensure a stable and fair tax system
- 4.22 [4.31] G. Invest in our school systems



Questionnaire Tabulation Report by Length of Residency:

over 15

(percentages listed on left are total for all questionnaires, boxed percentages for the particular set)

Total returned
questionnaires 1119

anonymous
returns 31.9% [32.5%]

51.2% male [49.3%]
45.3% female [46.9%]

Source

16.9%	Times	[17.6%]
3.0%	Neighborhood	[2.3%]
0.7%	Eastside	[0.7%]
72.3%	METRO	[72.9%]
7.0%	Coffee	[6.3%]

Age

5.9%	18-29	[3.2%]
19.5%	30-39	[12.5%]
25.3%	40-49	[24.4%]
29.2%	50-64	[35.0%]
18.1%	65 or older	[23.3%]

80.7%	own	[87.1%]
17.3%	rent	[11.4%]
7.9%	rural	[8.2%]
35.8%	suburban	[36.2%]
55%	urban	[55.1%]

8.5%

21.5%

67.9%

1. Positive values

- 30.6% [29.0%] have a good job.
- 40.3% [50.3%] My family lives here.
- 8.5% [8.1%] feel safe: Sense of security is better here.
- 65.7% [63.5%] like the environment-recreation here.
- 15.4% [15.3%] It's a good place for children to grow up.
- 38.1% [38.7%] like the quality of life in my neighborhood.
- 34% [35.1%] The independent spirit of the Pacific Northwest
- 18.2% [14.5%] Opportunities for the future are good here.
- 15.5% [16.1%] Every place else I look seems worse.
- 26.7% [24.0%] The artistic and cultural life of the region.

2. Major Concerns

- 38.3% [42.0%] Too many people in one place
- 7.8% [6.0%] I don't feel like I belong; not enough community spirit
- 16.9% [19.2%] Too much government interference in life/property
- 24.7% [28.3%] Taxes
- 21.7% [21.0%] Ugly streets, buildings/ deterioration of neighborhood
- 14.2% [10.7%] Can't afford to own the kind of home I want
- 62.6% [65.5%] Too much crime and random violence
- 60.8% [60.2%] Not able to get around; stressful traffic congestion
- 14.1% [13.0%] Not enough good jobs

3. How many more people in your neighborhood?

- 42.6% none [45.9%]
- 34.2% few [33.8%]
- 16.9% some [14.6%]
- 4.3% lots [3.6%]

4. Best mobility Options

- 32.3% [31.4%] More frequent bus service in my neighborhood
- 24.6% [24.9%] Commuter rail on existing train tracks
- 13.5% [12.4%] Living closer to where I work
- 17.1% [13.3%] Bicycle lanes and more bike facilities on buses
- 13.2% [13.6%] More carpool lanes/carpooling and vanpooling
- 48.9% [46.6%] A regional rapid rail system
- 25.4% [27.2%] Improvements to our current road system
- 6.5% [5.6%] Trolleys and/or low speed multi-stop rail

5. Economic Vitality (1-5)

- 4.02 [4.00] A. Invest in roads, transit & new technology
- 4.36 [4.33] B. Protect our natural environment and resources
- 3.49 [3.46] C. Work to attract globally competitive industries
- 3.55 [3.52] D. Affordable housing in attractive neighborhoods
- 3.34 [3.48] E. Government regulation doesn't hinder business
- 4.06 [4.13] F. Ensure a stable and fair tax system
- 4.22 [4.19] G. Invest in our school systems



Questionnaire Tabulation Report by

Age: 18-29

(percentages listed on left are total for all questionnaires, boxed percentages for the particular set)

Total returned
questionnaires 97

anonymous
returns 31.9% [28.0%]

51.2% male [44.3%]
45.3% female [54.6%]

Source

16.9%	Times	[13.4%]
3.0%	Neighborhood	[3.1%]
0.7%	Eastside	[0.0%]
72.3%	METRO	[80.4%]
7.0%	Coffee	[3.1%]

Resided here

8.5%	less than 5 years	[38.1%]
21.5%	5-15	[24.7%]
67.9%	over 15	[37.1%]

80.7%	own	[33.0%]
17.3%	rent	[64.9%]
7.9%	rural	[6.2%]
35.8%	suburban	[27.8%]
55.4%	urban	[64.9%]

1. Positive values

- 30.6% [34.0%] have a good job.
- 40.3% [41.2%] My family lives here.
- 8.5% [9.3%] feel safe: Sense of security is better here.
- 65.7% [77.3%] like the environment-recreation here.
- 15.4% [10.3%] It's a good place for children to grow up.
- 38.1% [16.5%] like the quality of life in my neighborhood.
- 34% [37.1%] The independent spirit of the Pacific Northwest
- 18.2% [33.0%] Opportunities for the future are good here.
- 15.5% [14.4%] Every place else I look seems worse.
- 26.7% [25.8%] The artistic and cultural life of the region.

2. Major Concerns

- 38.3% [33.0%] Too many people in one place
- 7.8% [12.4%] I don't feel like I belong; not enough community spirit
- 16.9% [10.3%] Too much government interference in life/property
- 24.7% [12.4%] Taxes
- 21.7% [26.8%] Ugly streets, buildings/ deterioration of neighborhood
- 14.2% [35.1%] Can't afford to own the kind of home I want
- 62.6% [61.9%] Too much crime and random violence
- 60.8% [63.9%] Not able to get around; stressful traffic congestion
- 14.1% [10.3%] Not enough good jobs

3. How many more people in your neighborhood?

- 42.6% none [34.0%]
- 34.2% few [44.3%]
- 16.9% some [16.5%]
- 4.3% lots [4.1%]

4. Best mobility Options

- 32.3% [30.9%] More frequent bus service in my neighborhood
- 24.6% [21.6%] Commuter rail on existing train tracks
- 13.5% [14.4%] Living closer to where I work
- 17.1% [35.1%] Bicycle lanes and more bike facilities on buses
- 13.2% [17.5%] More carpool lanes/carpooling and vanpooling
- 48.9% [54.6%] A regional rapid rail system
- 25.4% [18.6%] Improvements to our current road system
- 6.5% [6.3%] Trolleys and/or low speed multi-stop rail

5. Economic Vitality (1-6)

- 4.02 [4.09] A. Invest in roads, transit & new technology
- 4.36 [4.47] B. Protect our natural environment and resources
- 3.49 [3.47] C. Work to attract globally competitive industries
- 3.55 [3.58] D. Affordable housing in attractive neighborhoods
- 3.34 [3.23] E. Government regulation doesn't hinder business
- 4.06 [3.69] F. Ensure a stable and fair tax system
- 4.22 [4.49] G. Invest in our school systems

Questionnaire Tabulation Report by Age: 30-39

(percentages listed on left are total for all questionnaires, boxed percentages for the particular set)

Total returned questionnaires 317	Source	16.9% Times	16.1%	Resided here	80.7% own	71.9%
anonymous returns 31.9%	3.0% Neighborhood	1.9%	8.5% less than 5 years	15.8%	17.3% rent	26.8%
51.2% male	0.7% Eastside	0.0%	21.5% 5-15	40.1%	7.9% rural	8.2%
45.3% female	72.3% METRO	75.7%	67.9% over 15	44.2%	35.8% suburban	32.2%
	7.0% Coffee	6.3%			55.4% urban	59.3%

1. Positive values

- 30.6% [34.4%] have a good job.
- 40.3% [36.0%] My family lives here.
- 8.5% [7.9%] feel safe: Sense of security is better here.
- 65.7% [70.3%] like the environment-recreation here.
- 15.4% [17.4%] It's a good place for children to grow up.
- 38.1% [30.9%] like the quality of life in my neighborhood.
- 34% [30.0%] The independent spirit of the Pacific Northwest
- 18.2% [24.0%] Opportunities for the future are good here.
- 15.5% [14.8%] Every place else I look seems worse.
- 26.7% [26.5%] The artistic and cultural life of the region.

2. Major Concerns

- 38.3% [33.1%] Too many people in one place
- 7.8% [9.5%] I don't feel like I belong; not enough community spirit
- 16.9% [11.0%] Too much government interference in life/property
- 24.7% [17.0%] Taxes
- 21.7% [24.3%] Ugly streets, buildings/ deterioration of neighborhood
- 14.2% [24.0%] Can't afford to own the kind of home I want
- 62.6% [55.8%] Too much crime and random violence
- 60.8% [64.4%] Not able to get around; stressful traffic congestion
- 14.1% [15.1%] Not enough good jobs

3. How many more people in your neighborhood?

- 42.6% none [36.0%]
- 34.2% few [29.7%]
- 16.9% some [26.8%]
- 4.3% lots [5.4%]

4. Best mobility Options

- 32.3% [35.3%] More frequent bus service in my neighborhood
- 24.6% [21.1%] Commuter rail on existing train tracks
- 13.5% [20.8%] Living closer to where I work
- 17.1% [24.3%] Bicycle lanes and more bike facilities on buses
- 13.2% [12.0%] More carpool lanes/carpooling and vanpooling
- 48.9% [51.7%] A regional rapid rail system
- 25.4% [18.6%] Improvements to our current road system
- 6.5% [7.8%] Trolleys and/or low speed multi-stop rail

5. Economic Vitality (1-5)

- 4.02 [4.07] A. Invest in roads, transit & new technology
- 4.36 [4.44] B. Protect our natural environment and resources
- 3.49 [3.43] C. Work to attract globally competitive industries
- 3.55 [3.57] D. Affordable housing in attractive neighborhoods
- 3.34 [3.11] E. Government regulation doesn't hinder business
- 4.06 [3.88] F. Ensure a stable and fair tax system
- 4.22 [4.41] G. Invest in our school systems

Questionnaire Tabulation Report by Age: 40-49

(percentages listed on left are total for all questionnaires, boxed percentages for the particular set)

Total returned questionnaires 413	Source	16.9% Times	18.6%	Resided here	80.7% own	84.9%
anonymous returns 31.9%	3.0% Neighborhood	1.9%	8.5% less than 5 years	7.3%	17.3% rent	13.4%
51.2% male	0.7% Eastside	1.2%	21.5% 5-15	26.6%	7.9% rural	9.0%
45.3% female	72.3% METRO	70.9%	67.9% over 15	66.1%	35.8% suburban	35.4%
	7.0% Coffee	7.0%			55.4% urban	55.4%

1. Positive values

- 30.6% [41.2%] have a good job.
- 40.3% [29.1%] My family lives here.
- 8.5% [6.8%] feel safe: Sense of security is better here.
- 65.7% [65.9%] like the environment-recreation here.
- 15.4% [15.5%] It's a good place for children to grow up.
- 38.1% [33.9%] like the quality of life in my neighborhood.
- 34% [33.9%] The independent spirit of the Pacific Northwest
- 18.2% [17.9%] Opportunities for the future are good here.
- 15.5% [14.0%] Every place else I look seems worse.
- 26.7% [23.0%] The artistic and cultural life of the region.

2. Major Concerns

- 38.3% [45.5%] Too many people in one place
- 7.8% [10.2%] I don't feel like I belong; not enough community spirit
- 16.9% [13.3%] Too much government interference in life/property
- 24.7% [21.1%] Taxes
- 21.7% [19.6%] Ugly streets, buildings/ deterioration of neighborhood
- 14.2% [16.9%] Can't afford to own the kind of home I want
- 62.6% [58.1%] Too much crime and random violence
- 60.8% [65.6%] Not able to get around; stressful traffic congestion
- 14.1% [15.5%] Not enough good jobs

3. How many more people in your neighborhood?

- 42.6% none [45.3%]
- 34.2% few [35.1%]
- 16.9% some [14.3%]
- 4.3% lots [4.1%]

4. Best mobility Options

- 32.3% [30.3%] More frequent bus service in my neighborhood
- 24.6% [23.2%] Commuter rail on existing train tracks
- 13.5% [16.2%] Living closer to where I work
- 17.1% [18.9%] Bicycle lanes and more bike facilities on buses
- 13.2% [17.2%] More carpool lanes/carpooling and vanpooling
- 48.9% [47.7%] A regional rapid rail system
- 25.4% [25.9%] Improvements to our current road system
- 6.5% [3.6%] Trolleys and/or low speed multi-stop rail

5. Economic Vitality (1-5)

- 4.02 [3.97] A. Invest in roads, transit & new technology
- 4.36 [4.41] B. Protect our natural environment and resources
- 3.49 [3.47] C. Work to attract globally competitive industries
- 3.55 [3.41] D. Affordable housing in attractive neighborhoods
- 3.34 [3.19] E. Government regulation doesn't hinder business
- 4.06 [3.97] F. Ensure a stable and fair tax system
- 4.22 [4.20] G. Invest in our school systems

Questionnaire Tabulation Report by Age: **50-64**
(percentages listed on left are total for all questionnaires, boxed percentages for the particular set)

Total returned questionnaires	476	Source	16.9% Times	17.0%	Resided here	80.7% own	90.7%
anonymous returns	31.9%	32.7%	3.0% Neighborhood	3.6%	8.5% less than 5 years	17.3% rent	8.2%
51.2% male	49.6%	0.7% Eastside	0.8%	21.5% 5-15	14.5%	7.9% rural	8.0%
45.3% female	46.8%	72.3% METRO	70.6%	67.9% over 15	82.1%	35.8% suburban	41.6%
		7.0% Coffee	8.0%			55.4% urban	50.2%

1. Positive values

- 30.6% [32.4%] have a good job.
- 40.3% [43.7%] My family lives here.
- 8.5% [9.2%] feel safe: Sense of security is better here.
- 65.7% [63.2%] like the environment-recreation here.
- 15.4% [16.2%] It's a good place for children to grow up.
- 38.1% [44.5%] like the quality of life in my neighborhood.
- 34% [33.2%] The independent spirit of the Pacific Northwest
- 18.2% [15.1%] Opportunities for the future are good here.
- 15.5% [15.8%] Every place else I look seems worse.
- 26.7% [27.9%] The artistic and cultural life of the region.

2. Major Concerns

- 38.3% [37.6%] Too many people in one place
- 7.8% [5.9%] I don't feel like I belong; not enough community spirit
- 16.9% [22.3%] Too much government interference in life/property
- 24.7% [29.6%] Taxes
- 21.7% [20.8%] Ugly streets, buildings/ deterioration of neighborhood
- 14.2% [7.6%] Can't afford to own the kind of home I want
- 62.6% [65.1%] Too much crime and random violence
- 60.8% [60.9%] Not able to get around; stressful traffic congestion
- 14.1% [14.7%] Not enough good jobs

3. How many more people in your neighborhood?

- 42.6% none [43.8%]
- 34.2% few [35.6%]
- 16.9% some [13.5%]
- 4.3% lots [5.5%]

4. Best mobility Options

- 32.3% [33.4%] More frequent bus service in my neighborhood
- 24.6% [23.5%] Commuter rail on existing train tracks
- 13.5% [13.7%] Living closer to where I work
- 17.1% [13.9%] Bicycle lanes and more bike facilities on buses
- 13.2% [11.1%] More carpool lanes/carpooling and vanpooling
- 48.9% [46.2%] A regional rapid rail system
- 25.4% [29.0%] Improvements to our current road system
- 6.5% [7.2%] Trolleys and/or low speed multi-stop rail

5. Economic Vitality (1-5)

- 4.02 [4.04] A. Invest in roads, transit & new technology
- 4.36 [4.33] B. Protect our natural environment and resources
- 3.49 [3.51] C. Work to attract globally competitive industries
- 3.55 [3.53] D. Affordable housing in attractive neighborhoods
- 3.34 [3.49] E. Government regulation doesn't hinder business
- 4.06 [4.11] F. Ensure a stable and fair tax system
- 4.22 [4.13] G. Invest in our school systems

Questionnaire Tabulation Report by Age: **65 or older**
(percentages listed on left are total for all questionnaires, boxed percentages for the particular set)

Total returned questionnaires	290	Source	16.9% Times	15.9%	Resided here	80.7% own	86.9%
anonymous returns	31.9%	29.8%	3.0% Neighborhood	2.8%	8.5% less than 5 years	17.3% rent	12.1%
51.2% male	53.6%	0.7% Eastside	0.3%	21.5% 5-15	7.9%	7.9% rural	6.2%
45.3% female	42.2%	72.3% METRO	73.4%	67.9% over 15	89.7%	35.8% suburban	36.2%
		7.0% Coffee	7.6%			55.4% urban	57.2%

1. Positive values

- 30.6% [9.3%] have a good job.
- 40.3% [55.2%] My family lives here.
- 8.5% [10.3%] feel safe: Sense of security is better here.
- 65.7% [62.1%] like the environment-recreation here.
- 15.4% [13.8%] It's a good place for children to grow up.
- 38.1% [50.0%] like the quality of life in my neighborhood.
- 34% [38.6%] The independent spirit of the Pacific Northwest
- 18.2% [13.4%] Opportunities for the future are good here.
- 15.5% [18.6%] Every place else I look seems worse.
- 26.7% [30.3%] The artistic and cultural life of the region.

2. Major Concerns

- 38.3% [39.0%] Too many people in one place
- 7.8% [4.5%] I don't feel like I belong; not enough community spirit
- 16.9% [20.3%] Too much government interference in life/property
- 24.7% [34.5%] Taxes
- 21.7% [21.4%] Ugly streets, buildings/ deterioration of neighborhood
- 14.2% [4.5%] Can't afford to own the kind of home I want
- 62.6% [72.4%] Too much crime and random violence
- 60.8% [49.7%] Not able to get around; stressful traffic congestion
- 14.1% [9.7%] Not enough good jobs

3. How many more people in your neighborhood?

- 42.6% none [46.0%]
- 34.2% few [33.6%]
- 16.9% some [15.6%]
- 4.3% lots [1.7%]

4. Best mobility Options

- 32.3% [30.7%] More frequent bus service in my neighborhood
- 24.6% [32.1%] Commuter rail on existing train tracks
- 13.5% [2.1%] Living closer to where I work
- 17.1% [7.9%] Bicycle lanes and more bike facilities on buses
- 13.2% [11.4%] More carpool lanes/carpooling and vanpooling
- 48.9% [50.0%] A regional rapid rail system
- 25.4% [28.3%] Improvements to our current road system
- 6.5% [6.9%] Trolleys and/or low speed multi-stop rail

5. Economic Vitality (1-5)

- 4.02 [4.04] A. Invest in roads, transit & new technology
- 4.36 [4.26] B. Protect our natural environment and resources
- 3.49 [3.54] C. Work to attract globally competitive industries
- 3.55 [3.76] D. Affordable housing in attractive neighborhoods
- 3.34 [3.67] E. Government regulation doesn't hinder business
- 4.06 [4.41] F. Ensure a stable and fair tax system
- 4.22 [4.18] G. Invest in our school systems



Report by Source of Questionnaire **Neighborhood**

(percentages listed on left are total for all questionnaires, boxed percentages for the particular set)

Total returned 50
questionnaires

anonymous 31.9% 58.7%
returns

51.2% male 38.0%
45.3% female 46.0%

7.9% rural 0.0%
35.8% suburban 4.0%
55.4% urban 96.0%

Age

5.9% 18-29 6.0%
19.5% 30-39 18.0%
25.3% 40-49 16.0%
29.2% 50-64 38.0%
18.1% 65 or older 18.0%

Resided here

8.5% less than 5 years 10.0%
21.5% 5-15 22.0%
67.9% over 15 52.0%
80.7% own 64.0%
17.3% rent 30.0%

1. Positive values

30.6% 26.0% have a good job.
40.3% 38.0% My family lives here.
8.5% 10.0% feel safe: Sense of security is better here.
65.7% 58.0% like the environment-recreation here.
15.4% 12.0% It's a good place for children to grow up.
38.1% 40.0% like the quality of life in my neighborhood.
34% 42.0% The independent spirit of the Pacific Northwest
18.2% 12.0% Opportunities for the future are good here.
15.5% 18.0% Every place else I look seems worse.
26.7% 25.0% The artistic and cultural life of the region.

2. Major Concerns

38.3% 26.0% Too many people in one place
7.8% 4.0% I don't feel like I belong; not enough community spirit
16.9% 8.0% Too much government interference in life/property
24.7% 14.0% Taxes
21.7% 34.0% Ugly streets, buildings/ deterioration of neighborhood
14.2% 16.0% Can't afford to own the kind of home I want
62.6% 66.0% Too much crime and random violence
60.8% 70.0% Not able to get around; stressful traffic congestion
14.1% 20.0% Not enough good jobs

3. How many more people in your neighborhood?

42.6% none 40.0%
34.2% few 44.0%
16.9% some 10.0%
4.3% lots 6.0%

4. Best mobility Options

32.3% 34.0% More frequent bus service in my neighborhood
24.6% 34.0% Commuter rail on existing train tracks
13.5% 14.0% Living closer to where I work
17.1% 14.0% Bicycle lanes and more bike facilities on buses
13.2% 6.0% More carpool lanes/carpooling and vanpooling
48.9% 56.0% A regional rapid rail system
25.4% 18.0% Improvements to our current road system
6.5% 5.1% Trolleys and/or low speed multi-stop rail

5. Economic Vitality (1-5)

4.02 4.20 A. Invest in roads, transit & new technology
4.36 4.53 B. Protect our natural environment and resources
3.49 3.43 C. Work to attract globally competitive industries
3.55 4.02 D. Affordable housing in attractive neighborhoods
3.34 3.11 E. Government regulation doesn't hinder business
4.06 4.08 F. Ensure a stable and fair tax system
4.22 4.31 G. Invest in our school systems



Report by Source of Questionnaire **Times**

(percentages listed on left are total for all questionnaires, boxed percentages for the particular set)

Total returned 279
questionnaires

anonymous 31.9% 63.1%
returns

51.2% male 50.2%
45.3% female 47.0%

7.9% rural 5.7%
35.8% suburban 42.7%
55.4% urban 50.2%

Age

5.9% 18-29 4.7%
19.5% 30-39 18.6%
25.3% 40-49 28.0%
29.2% 50-64 29.7%
18.1% 65 or older 16.8%

Resided here

8.5% less than 5 years 8.6%
21.5% 5-15 18.3%
67.9% over 15 70.6%
80.7% own 83.9%
17.3% rent 14.3%

1. Positive values

30.6% 24.7% have a good job.
40.3% 40.5% My family lives here.
8.5% 8.2% feel safe: Sense of security is better here.
65.7% 64.2% like the environment-recreation here.
15.4% 11.5% It's a good place for children to grow up.
38.1% 35.1% like the quality of life in my neighborhood.
34% 39.1% The independent spirit of the Pacific Northwest
18.2% 14.7% Opportunities for the future are good here.
15.5% 18.6% Every place else I look seems worse.
26.7% 28.0% The artistic and cultural life of the region.

2. Major Concerns

38.3% 45.9% Too many people in one place
7.8% 5.4% I don't feel like I belong; not enough community spirit
16.9% 17.6% Too much government interference in life/property
24.7% 28.3% Taxes
21.7% 20.8% Ugly streets, buildings/ deterioration of neighborhood
14.2% 13.3% Can't afford to own the kind of home I want
62.6% 64.5% Too much crime and random violence
60.8% 61.6% Not able to get around; stressful traffic congestion
14.1% 15.8% Not enough good jobs

3. How many more people in your neighborhood?

42.6% none 47.7%
34.2% few 34.8%
16.9% some 13.6%
4.3% lots 2.5%

4. Best mobility Options

32.3% 30.1% More frequent bus service in my neighborhood
24.6% 21.1% Commuter rail on existing train tracks
13.5% 13.3% Living closer to where I work
17.1% 15.8% Bicycle lanes and more bike facilities on buses
13.2% 11.5% More carpool lanes/carpooling and vanpooling
48.9% 42.3% A regional rapid rail system
25.4% 28.3% Improvements to our current road system
6.5% 6.9% Trolleys and/or low speed multi-stop rail

5. Economic Vitality (1-5)

4.02 3.60 A. Invest in roads, transit & new technology
4.36 4.27 B. Protect our natural environment and resources
3.49 3.40 C. Work to attract globally competitive industries
3.55 3.36 D. Affordable housing in attractive neighborhoods
3.34 3.43 E. Government regulation doesn't hinder business
4.06 4.00 F. Ensure a stable and fair tax system
4.22 4.03 G. Invest in our school systems



Profile Report by Anti-Government Returns:

Percentages listed on left are total for all questionnaires, boxed percentages for the particular set)

Total returned questionnaires 279

anonymous returns 31.9% [30.4%]

51.2% male [69.5%]

45.3% female [25.8%]

7.9% rural [16.8%] 55.4%

35.8% suburban [45.2%]

55.4%

Source	Age	Resided here
16.9% Times [17.6%]	5.9% 18-29 [3.6%]	8.5% less than 5 years [4.3%]
3.0% Neighborhood [1.4%]	19.5% 30-39 [12.5%]	21.5% 5-15 [15.8%]
0.7% Eastside [0.4%]	25.3% 40-49 [20.4%]	67.9% over 15 [77.1%]
72.3% METRO [69.5%]	29.2% 50-64 [38.7%]	80.7% own [89.9%]
7.0% Coffee [11.1%]	18.1% 65 or older [21.9%]	17.3% rent [8.3%]

1. Positive values

- 30.6% [33.3%] have a good job.
- 40.3% [48.4%] My family lives here.
- 8.5% [11.1%] feel safe: Sense of security is better here.
- 65.7% [53.0%] like the environment-recreation here.
- 15.4% [23.7%] It's a good place for children to grow up.
- 38.1% [38.4%] like the quality of life in my neighborhood.
- 34% [34.1%] The independent spirit of the Pacific Northwest
- 18.2% [22.6%] Opportunities for the future are good here.
- 15.5% [16.8%] Every place else I look seems worse.
- 26.7% [13.6%] The artistic and cultural life of the region.

2. Major Concerns

- 38.3% [21.1%] Too many people in one place
- 7.8% [4.3%] I don't feel like I belong; not enough community spirit
- 16.9% [100.0%] Too much government interference in life/property
- 24.7% [65.2%] Taxes
- 21.7% [8.6%] Ugly streets, buildings/ deterioration of neighborhood
- 14.2% [7.9%] Can't afford to own the kind of home I want
- 62.6% [55.2%] Too much crime and random violence
- 60.8% [32.6%] Not able to get around; stressful traffic congestion
- 14.1% [9.7%] Not enough good jobs

3. How many more people in your neighborhood?

- 42.6% none [40.1%]
- 34.2% few [34.1%]
- 16.9% some [17.6%]
- 4.3% lots [6.5%]

4. Best mobility Options

- 32.3% [26.5%] More frequent bus service in my neighborhood
- 24.6% [27.2%] Commuter rail on existing train tracks
- 13.5% [12.2%] Living closer to where I work
- 17.1% [5.8%] Bicycle lanes and more bike facilities on buses
- 13.2% [15.4%] More carpool lanes/carpooling and vanpooling
- 48.9% [33.0%] A regional rapid rail system
- 25.4% [53.4%] Improvements to our current road system
- 6.5% [3.6%] Trolleys and/or low speed multi-stop rail

5. Economic Vitality (1-5)

- 4.02 [3.85] A. Invest in roads, transit & new technology
- 4.36 [3.48] B. Protect our natural environment and resources
- 3.49 [3.62] C. Work to attract globally competitive industries
- 3.55 [2.98] D. Affordable housing in attractive neighborhoods
- 3.34 [4.40] E. Government regulation doesn't hinder business
- 4.06 [4.19] F. Ensure a stable and fair tax system
- 4.22 [3.63] G. Invest in our school systems

Jim Reid, Manager
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February 25, 1994

Thank you for the opportunity to review the Draft Supplemental Environmental Impact Statement for the Countywide Planning Policies. Members of the community and environmental groups listed below offer the following comments, based on a series of discussions and refining the preliminary comments given in the hearing on the DSEIS held by the King County Council's Growth Management, Housing and Environment Committee. We recognize that the DSEIS fulfills its purpose as a programmatic EIS and as one of a series of documents that, on completion, will contain the information needed for the GMPC to make a decision on the alternatives for growth management in King County.

We support a "Flexible Centers approach", as a logical continuation of the direction of King County planning over the last 20 years and as a stated goal of Vision 2020. In order to provide the desired quality of life in a realistic time-frame, this approach should be based on:

- a variety of center types with a range of criteria;
- local control over how density is to be achieved within centers;
- urban centers to be mass-transit (not necessarily rail) based;
- an extended time scale for achieving target densities;
- an expanded treatment of the non-center urban areas including recognition of distinct neighborhoods, a balance of housing, services and employment, and accompanying design standards that allow more density without loss of character;
- benchmarking and least-cost planning, including social costs and benefits, to be a feature of the centers approach;
- an expanded range of incentives to be blended with reformed regulation in the centers approach;
- the urban-rural line to be no further east than the 1992 CPPs, to be planned as a 20-year line with no significant amendments for at least two benchmark cycles - with amendments to be based on adopted criteria. *adopted in the 1993 interim urban growth boundaries, with the City of Black Diamond, needs further review and analysis in the King County Comprehensive Plan C1*
- urban growth boundaries for the rural cities to be as laid out in the 1992 CPPs, planned as 20 year expansion areas with no significant amendments for at least the next two benchmark cycles.

The number of centers should continue to be determined through self-nomination and local comprehensive plans which achieve necessary targets in population and employment. It is assumed that this will result in at least eight urban centers and possibly more as localities meet criteria. Centers will have significant transit centers. Other urban areas will be able to nominate themselves for a different type of center status, utilizing mass-transit but without a formal transit center.

The organizations listed on the signature page of this comment are for identification purposes only. They are not official endorsements from the organizations.

Common Goals:

- Liveable cities (includes housing at all market levels, adequate family-wage employment, public safety, balance between housing, services and employment, user-friendly transit and acceptable schools)
- Functioning neighborhoods (includes pre-application community review, appropriate design standards, recreational opportunities, mixed-use zoning, pedestrian-friendly lay-out)
- Open space (includes pocket parks and playgrounds, trails, significant urban separators, major parks)
- Permanent rural areas (completing the range of lifestyle choices offered to King County residents; using minimal infrastructure with rural levels of service; supporting a rural economy, and forming a buffer between urban and resource lands to facilitate the retention of agricultural and timber lands in the county))
- Functioning farm and timber lands (includes commercial and non-commercial farms, tree farms, woodlots and pasture lands, resource lands and resource-based industry). A thriving fisheries resource, based in the rural area and managed on a watershed basis.
- Wilderness (includes "close-in" wild-life areas (Cougar Mountain), areas off-limits to motor vehicles and tracts of "set-aside" land sufficient to preserve threatened species)
- Clean water and air, flourishing wildlife habitat (inside and outside cities), retention of native vegetation and landforms (much of this involves shifting from SOV dependency to transit system)
- A diverse, vibrant and sustainable economy, regionwide.

Methods:

- bottoms-up planning with extensive and meaningful public participation for all communities, whether urban, suburban or rural, with the planning area broken into distinct neighborhoods (urban and suburban) or drawn to include existing surrounding neighborhoods if a significant portion of the planning area is currently undeveloped (rural and possibly non-center urban). Each jurisdiction to maintain an Office of Neighborhoods or equivalent method of notifying and involving planning area residents. Each jurisdiction to set up a procedure for pre-application community review, in which community representatives and developers address proposed projects, and work together to a satisfactory outcome.
- Design standards that reflect the historic, rural or other defining characteristics of the nature of each community or neighborhood. These standards to be arrived at through broad-based public participation in the planning stage, and addressing transportation issues, size and scale as well as function and aesthetics.
- Equal emphasis on economic development and environmental protection - acknowledging the mutual dependence between the area's economy and the quality of its environment. Active pursuit of clean industry and family wage jobs, with aggressive enforcement of standards and codes that protect air and water quality, vegetation retention and natural landforms. Each jurisdiction to commit to monitoring programs and effective code enforcement to achieve standards. Each jurisdiction to implement an incentive program to encourage desirable employers to move into the area. Acknowledgement of the role played by the natural resource industry in the county's economy.

- Each community plan to have a "housing element" which provides an inventory of low-income housing and a commitment to preserving existing affordable housing, promoting home-ownership and fostering non-traditional methods of achieving an adequate supply of new affordable housing (as part of a range of housing choices) and a sense of community which includes non-owners. Methods to include a mix of incentives and regulation.

- Regulatory reform that genuinely achieves the existing or better standard of environmental and community protection through fewer, less burdensome and fully integrated regulations. Incentives to be developed through the community review process in areas designated for urban growth.

A 20-year planning commitment to an urban-rural line that does not encroach on existing rural areas. The annual review allowed for the comprehensive plan shall not address the boundary of the urban growth area until two six-year cycles of monitoring and benchmark review/adjustment have taken place. Planning for the rural areas beyond the 20-year mark, or any proposed amendment that addresses the urban-rural line, should be based on adopted criteria and a widespread and meaningful public process.

- Significant urban separators between suburban cities. Community separators between neighborhoods in suburban cities. Separators and open space to be an essential element of any urban redevelopment plan.
- Groundwater and surface water issues to be given priority in decisions about projects proposed for undeveloped land. Water availability to be documented before project approval. Aquifer recharge areas to be identified and managed as a resource before permits are issued for undeveloped land. Surface water systems that encourage infiltration and natural retention/detention are to be preferred over piped systems in areas where surface water is not directed to the METRO sewer system.
- Urban designated lands to be developed in a phased pattern that minimizes infrastructure costs and maintains within the UGA a land-bank sufficient to achieve the benchmarks for affordable housing, densities, employment opportunities and other essential elements for each six-year cycle, and to make up for any shortfall in achieving these benchmarks in the previous six-year cycle.
- Monitoring to be done through a benchmark system, and evaluated through an independent process. Benchmark monitoring to be included in the adopted alternative.
- Mass transit to be an essential element of an urban center. Increased transit service and opportunities for non-motorized transportation to be an essential element of all plans, including those in rural and non-center areas.
- Least-cost planning to be included in the adopted alternative. Least-cost planning to include social and long-term costs as well as immediate economic benefits.

Pat Stoschl
Vision Seattle

Marganne Tagney Jones
Sensible Growth Alliance

Frank Nelson
RURAL NEIGHBOORS - COVINGTON

John House
Friends of Snoqualmie Valley

Chris Leman
Eastlake Community Council
Seattle

PAT BREWINGTON
SNOQUALMIE VALLEY TRAILS CLUB

Mary Norton
Three Forks Community Council
Snoqualmie

President: Hollywood Hill Assn.
Woodinville, WA.

Steve Halstrom
Tolt Community Club
Carnation, WA

Hans Aschenbach
Immediate Past President
Roosevelt Neighbors' Alliance

B. Steens
Seattle, WA

RECEIVED

JAN 18 1991

1/14/91

King County Planning & Community Development Division
Attn: Lisa Majdiak
Smith Tower Building
506 Second Avenue - Room 707
Seattle, WA 98104

Subj: Comments on Environmental Study

To Whom It May Concern,

I strongly favor the Urban center concept,
either 8, 14, or a combination of the two.

One needs only look at Los Angeles, Phoenix,
Las Vegas, or Houston to name a few examples
where uncontrolled suburban growth has
led to highway congestion, lack of open
green space, and impossible conditions for
a rapid transit system.

One of the unique and irreplaceable character
of Seattle is its scenic beauty and proximity
unspoiled open spaces. What has already
occurred on the East side in Issaquah,
Bellevue, North Bend, etc. is a tragedy but
it is not too late to remedy the situation.

(cont)

(2)

- I strongly believe that if King County...
- 1) aggressively developed the proposed urban center concept to concentrate urban growth,
 - 2) rapidly implemented a combined light rail and bus transit system conveniently linking each of the urban centers, and ³ simultaneously suspended all expansion of suburban freeway and single family home developments that people would adapt and the ceaseless sprawl could be contained.

Necessity is the mother of invention as the saying goes and I believe with the right incentives developers could/would successfully and profitably adapt their efforts towards incentive urban/high density developments. Likewise, I believe residents would discover/rediscover the beauty and convenience of living and working in closer proximity to Seattle and its existing urban environs.

I live in the Lakewood/Seward Park neighborhood and feel I have the best of both worlds. I have the solitude and beauty of Lake Washington Seward Park, and Genesee Park as well as the shopping and convenient access to downtown via Rainier Avenue.

(cont.)

(3)

Many residents of the Seattle area are completely unaware of the quaint and historical Columbia City district on Rainier, as well as all of the new development also. Other parts of Rainier are including the new Eagle Hardware and a new shopping center with an Olsson's market, Drug Emporium, etc. Areas like Columbia City with an existing infrastructure and slightly deteriorated surrounding residential areas are ripe for redevelopment which could easily include more high density condos and the like all easily accessed by what would seem like a logical rapid transit line down Rainier.

I sincerely hope that the Growth Management Planning Council will see beyond the short term wisdom of endless new suburban sprawl and show some far-sighted socially responsible judgement in determining the future of King County's growth. The days of endless natural resources and unbridled growth are numbered throughout the planet and it is time to face the issue head-on before we've ruined the special area we call home.

Scott Verrette
4525 47th Ave.
Seattle WA 98112

Woodinville, WA 22 February 1994

To: King County Planning & Community Development Division
Smith Tower Building
506 - 2nd Ave., Room 704
Seattle, WA 98104

RECEIVED
FEB 24 1994
FOOD

From: Mrs. Juannita Verschuyt
17226 - 208th Ave NE
Woodinville, WA 98072-7712

Re: Draft SEIS

Dear Ms. Moffitt

A brief comment to oppose moving the current boundary lines further East to the Snoqualmie Valley. That will leave just a "ribbon" for rural designation plus it is very important to keep as much rural atmosphere to help maintain the integrity of the many sensitive areas in the Bear Creek Basin. An article by Al Dams in the Woodinville Weekly (2-7-94) stated that "Woodinville would like that part of the growth line at least temporarily moved further east so the city could study the growth potential of it's neighbors", etc. I am adamantly opposed to moving the line before a study is done. Thank you for "listening".

Sincerely,

Juannita Verschuyt
Juannita Verschuyt

EVERETT MILLER
11830 164th Ave S. E.
RENTON, WA. 98057-6143

Lisa Majdiak, Growth Management Project Supervisor
Planning and Community Development Division
707 Smith Tower; 506 Second Ave
Seattle, WA. 98104

February 7, 1994

Dear Lisa;

You and your staff are to be commended on the generally high quality of the work in the Draft S.E.I.S. for the C.P.P. The data appears to be sufficient and your conclusions are generally well supported except with regard to the Magnet Alternative. Obviously it is difficult to assess the impacts of a nebulous proposal. However we do have experience with Bench Marks and public policy goals with out land use and other firm controls. By your Table 6 page 78 despite public policy encouraging transit use and discouraging SOV's transit use has declined in the last 10 years.

You have underestimated the probable adverse impacts on air quality, transportation, and water quality of the Magnet Alternative. With over half of the new housing units going into "Auto Friendly" or Transit Unfriendly areas there is every indication that we will have a repeat of the eighties with the result of the projected 33 percent population growth being 120 percent increase in auto traffic. Even if the persuasion is extremely effective and the increase is held to 80 percent the impact on air quality (there is not the potential for improving auto emissions like there was in 1970) water quality and transportation would be severe.

If the auto trips increase another 80% how can we meet the requirements of the 1990 CAAA for CO, TSP, O3 and PM10?

If there is no significant increase in roadway capacity how can traffic move at a reasonable rate with a doubling of trips and, according to page 166 column 2 paragraph 10, at least a 78 percent increase in VMT?

If we increase housing in the "Auto Friendly" areas by 110 thousand units or approximately one third there will be a significant increase in impermeable surfaces and "Residential Pollution". How will we avoid a parallel significant degradation of stream quality?

NS-19

NS-22

NS-20

There are some inadvertent typo's and other errors, page 20
col 2 pg 2 "a \$50 million land sale" should be Bond Sale, pg 23
bottom of col 2 "will necessitate a occur" missing words, table 2
Magnet Alternative does not add to 100.

Sincerely;

Everett Wilcock
11830 164th Ave S. E.
Renton, WA. 98059

Master Builders Association

of King and Snohomish Counties

2155 - 112th Avenue N.E., Suite 100 • Bellevue, Washington 98004
(206) 451-7920 • 1-800-522-2209 • FAX (206) 646-5555

Master Builders Association is affiliated with the National Association of Home Builders

February 28, 1994

Jim Reid, Manager & Responsible Public Official
Planning and Community Development Division
Parks, Planning, and Resources Department
707 Smith Tower Building
506 Second Avenue
Seattle, Washington 98104

SUBJECT: Draft Supplemental Environmental Impact State for the
Countywide Planning Policies

Dear Mr. Reid:

REQUEST TO BE INCLUDED IN THE RECORD

Please included the following comments in the draft SEIS/SEPA record on the above
referenced document issued on January 12, 1994.

STANDING

I am writing on behalf of the Master Builders Association of King and Snohomish Counties,
2155 112th Avenue N.E., Bellevue, Washington 98004. The Master Builders Association
represents the interests of approximately 1,500 businesses involved in all facets of the
home building industry in King County.

COMMENTS

1. Scope of the Environmental Review

The limited scope of this document cannot be justified by King County unless one considers
either mismanagement or a deliberate strategy to withhold information from citizens and
decision makers as justification. Specifically:

- IN-4 [I] The complete fiscal analysis, which at long last may be underway by
Tischler & Associates, Inc., should be included in this document.
- IN-4 [I] The failure to include a quantitative analysis "because the strategies and
programs which would implement the proposed policies have not yet been
designated by the County or the cities" is NOT TRUE. Among the 2300
pages of previous environmental documents adopted by King County as part
of this record is the FEIS for VISION 2020. Please refer to pages 182-303
of the VISION 2020 FEIS for long lists of strategies and programs that could
be used to implement the proposed policies. They are called "mitigation
measures."
- IN-5

1N-4

- II The failure to include baseline information on the location and capacity of infrastructure because it "not available" is also NOT TRUE. King County and its cities already have much of this information. Special purpose utility districts and investor-owned utilities are on record indicating their willingness to provide necessary information about their systems.
- II The inclusion of the wrong targets for allocating population and unemployment is also unexcusable. The same management that hired the production of the SEIS is responsible for the 16 month delay in releasing the targets as called for in LU-51 of the Countywide Planning Policies.

2. Centers Alternative

The background on the eight centers and 14 centers alternative fails to disclose important information known to the SEIS authors and their sponsor, King County.

Mention is made of criteria for "designation" as urban centers. This "criteria" included being up to 1 1/2 square miles of land, zoning to accommodate a minimum of 15,000 jobs within 1/2 mile of a transit center, an average 50 employees per gross acre; and average of 15 household per gross acre. Mention is further made of the role played by an non-elected interjurisdictional staff committee or "liaison group" in the designations.

LA-9

The centers were, in fact, self-designated by the cities which at the time were competing for stations on a proposed \$13 billion high speed rail system; which in all likelihood will not be built between now and the year 2010. The draft SEIS fails to include existing conditions and a uniform set of scaled maps for the centers. Since the draft SEIS authors seem to have great difficulty presenting uniform data sets, attachments 1 and 2 are provided.

LA-9

The final SEIS must include an analysis of the infrastructure capacity in each of the 14 centers and location and cumulative percentage of tear down activity that will be required to bring about the radical redevelopment that is being proposed by the Countywide Planning Policies.

LA-9

For example, SeaTac's proposed 930 acre "urban center" is in reality liner strip running on both sides of Highway 99. The hotel, rental car agencies, and similar support businesses enable the success of Seattle-Tacoma International Airport and the area currently employs 21,894 people. To accommodate the household growth assigned to SeaTac would by 2010 require 18 buildings with 20 stories or their equivalent. To accommodate the employment growth would by 2010 require 8 office buildings with 20 stories each or their equivalent.

The massive tear down strategy proposed by the centers alternative begs the question of where are all of the existing uses going to be accommodated. SeaTac's "urban center" will succeed only if all the hotels, all the car rental agencies and all the other goods and people moving infrastructure that exists around an international airport are demolished.

LA-9

What level of destruction is proposed in the eight and 14 centers alternatives? What happens to dislocated uses? Please provide a detailed analysis for each center, including a description of the buildings being proposed. The draft SEIS authors should also review the literature on a federal program that was known as "Urban Renewal." It failed.

3. Land Use

The weakest chapter in a very weak draft SEIS is by far the land use section. Rather than providing any independent analysis, the SEIS authors serve up a rehash of previously published data and reports by King County. Challenges to this work have been quite authoritative. They have been politely lodged and then ignored.

LA-1(e)

LA-1(f)

LA-2

LA-1(g)

Neither the figures produced for vacant land nor those for redevelopment potential have any basis in reality and have not one iota of credibility with the private sector. The draft SEIS acknowledges there may be "uncertainties and possible errors in data," but suggests this concern can be accommodated by a monitoring process during the life of the plan. It cannot.

The draft SEIS makes the claim that the Data Resources Technical Forum, another non-elected staff group, followed the procedure recommended by the state Department of Community Development (DCD) guidebook entitled "Issues in Designating Urban Growth Areas (Part I): Providing Adequate Urban Land Supply" (March 1992).

If so, the Data Forum have taken such steps as subtracting "vacant" parcels now used for storing container cargo, wet ponds, side yards, and numerous other types of "vacant" tax parcels that will never have any structures built on them. The process of subtracting such parcels is "Step 1" in the DCD guidebook, yet the fact is the Data Forum did not "conform to the procedure." Nor did the Data Forum "conform to the procedure" when it came to DCD's "Step 3," which is to subtract public purpose lands.

LA-1(c)

The SEIS authors must know that public and institutional land requirements grow with increases in populations and employment, but no such information is found in your SEIS. Not one acre for 325,000 more people.

LA-4(a)

The Land Use section's weaknesses do not stop with the faulty work of the Data Forum. The failure to follow impacts across county borders is absurd. The flat earth theory went out some time ago. The final SEIS had better have some analysis of the distinct possibility that the failure to provide housing choices in King County will spill our growth into at least a half dozen other counties.

4. Affordable Housing

The chapter on affordable housing is so devoid of information as to be almost comical. The discussion on pages 67-69 is a numberless narration attempting to persuade the reader that all of this will be no difference to housing costs. Without any numbers, without any analysis; there is nothing here to comment on.

Ho-1

Jim Reid
February 28, 1994
Page Four

40-B The final SEIS should include an analysis of land values under the various alternatives. All the alternatives being studied are based upon creating an artificial shortage of land. All would ring the urban growth areas by a large lot estate zone known called "rural."

LA-17 A major downzone of property in the rural area is likely. Land values in the urban area and urban centers would escalate. Housing and employment would be competing for the same ground inside the urban areas and urban centers.

40-9 Housing costs will rise accordingly. The final SEIS should estimate these costs and then determine how much individuals will be able to afford and how much will have to be made in government subsidizes.

40-10 Inclusionary zoning is not a remedy for a shortage of affordable housing. It is a method of rationing once that shortage has been created. Inclusionary zoning is probably not legal in the State of Washington and the draft SEIS authors should not be advising local governments to use this device. Furthermore, it has been shown that inclusionary zoning "programs set in motion a transfer of economic welfare from some low and middle-income households to others. Ultimately, little redistribution may be accomplished." [See: The Economics of Inclusionary Housing Programs by Julia L. Hansen; Issues and Trends in Business Economics, Volume IV, 1992; The Center for Economic and Business Research; College of Business and Economics; Western Washington University, Bellingham.]

5. Infrastructure

On page 24 of the Land Use section, it states that more compact development may result in: "Possible reduction in long-term public costs of serving new development. The research literature leads to no firm conclusion on this complex issue..."

Only a very careful reader of the draft SEIS, however, would find the footnote that will lead to truthful information on this subject. As presented, it is very misleading to the reader. The fact is the Final EIS for VISION 2020 included area and project specific work by Cambridge Systematics, Battelle Research, and Economic Databank Consultants.

This work isn't mere "literature," but an organized effort to look at both the capital and operating costs for such public facilities as highways and transit, water supply, sewage treatment and disposal, energy, education, fire, police, waste disposal, water quality and drainage, health, social services, parks and recreation, libraries, and government administration.

A-6 Cambridge and the Battelle/Databank team both came to the same conclusion, the least cost alternative is dispersed growth. This is a fact that is part of your record, why doesn't the draft SEIS acknowledge it? Is the Tischler study being "cooked" to refute it?

LA-45 The draft SEIS uses VISION 2020 to advance only those arguments its agrees with and disregards many others. For example, VISION 2020 agreed on page A-51 of the Final EIS that "the complex tie between growth and utilities requires as much policy attention as the tie between growth and transportation." VISION 2020 led one to believe this type of analysis would be conducted at the county level.

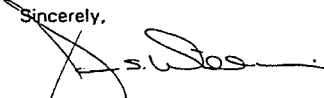
Jim Reid
February 28, 1994
Page Five

6. Miscellaneous

"Rural character" is mentioned throughout the document. Please define.

On page 20, the draft SEIS says: "King County identified, designated, and zoned a permanent rural area..." This is not true. Some of the rural area is available for inclusion in the urban areas of cities in eastern King county.

Sincerely,


James S. Williams
Executive Director

JSW:vh



January 28, 1994

Jim Reid
King County Planning and Community Development Division
707 Smith Tower Building, 506 Second Avenue
Seattle, WA 98104

Dear Mr. Reid:

Thank you for the information regarding the Draft Supplemental Environmental Impact Statement (EIS) for the King County Countywide Planning Policies. We appreciated the Executive Summary included in your letter and will view a copy of the document in a library. We will not purchase the draft, but are interested in obtaining a copy of the Final EIS. Please keep us on the list of people interested in obtaining copies of the Final Environmental Impact Statement.

Sincerely,

ADOLFSON ASSOCIATES, INC.

Pam Williams
Field Ecologist

February 25, 1994

Ms. Lisa Majdiak
Growth Management Project Supervisor
Planning & Community Development Division
Smith Tower
506 Second Ave., Suite 707
Seattle, Washington 98104

RE: Draft SEIS for Countywide Planning Policies

The County has presented the SEIS as the basis for citizens to use in making decisions and communicating their preferences to the County. As such, it should have sufficient information to frame the issues and allow a meaningful choice.

HO-1

Unfortunately, the SEIS is so limited in its scope that it is of little practical use. It has made assumptions that eliminate consideration of the real issues such as what are the chances that the centers strategy will work and at what cost to the public.

IN-6

It would help the public if the County acknowledged these major shortcomings instead of purporting to draw conclusions that the document does not support. For example, the discussion of affordable housing is at best inconclusive and at worst misleading.

At a minimum, the County should add a discussion and analysis of the following issues in the Final SEIS:

LA-6

IN-4

1. Fiscal impacts of the CPP's and the feasibility of reaching the twenty year targets for employment and housing.

2. Impacts both in this planning cycle and beyond 2010 of establishing a permanent urban growth boundary with all urban growth to be through increasing densities and redevelopment inside the line.

HO-7

3. Impacts on economic development and the availability of affordable housing if the centers fail to meet the market demands.

LA-4

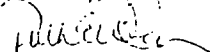
4. The realistic ability to correct future capacity shortfalls that may be demonstrated by benchmarks and indicators. Discuss tools that realistically



would be available, how quickly they could be implemented, by whom and at what cost.

If other documents will provide this information, those documents should be integrated into the public SEPA process if the public is to use the SEIS to understand the real choices and tradeoffs that are involved in the alternatives.

Sincerely,


Ruth E. Winbauer



18305 - 101ST. AVE. N.E.

BOTHELL, WASHINGTON 98011

February 28, 1994

faxed 2-28-94

Mr. Jim Reid, Manager and Responsible Official
Planning and Community Development Division
Parks, Planning and Resources Department
707 Smith Tower Building
506 Second Avenue
Seattle, WA 98104

RE: Comments on the Draft Supplemental Environmental Impact Statement (DSEIS) for the
King County Countywide Planning Policies

Dear Mr. Reid:

The City of Bothell would like to use the opportunity afforded by the issuance of the subject DSEIS to reiterate an issue previously brought to the attention of the Growth Management Planning Council.

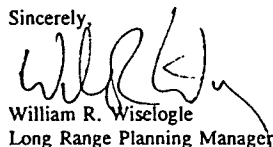
Although a substantial regional employment center, Bothell did not nominate itself as an urban center because the target residential densities would have severely taxed local infrastructure, would have been inconsistent with established community character, and appeared unachievable in any case. However, under the King County countywide planning policies, the next less intensive center, the "activity area", clearly does not fit Bothell's function in the region.

The City remains concerned that Bothell's infrastructure needs as an employment center receive a fair and equitable apportionment of regional resources. The King County countywide planning policies appear to oversimplify the range of activity centers which currently exist in the county, much less those which will exist in the future.

Under Vision 2020, Bothell clearly qualifies as a sub-regional center, by location and function, and is recognized as a candidate sub-regional center by Snohomish County. We realize previous tight timelines precluded consistency between King County and Snohomish County countywide policies and that the Regional Council has recently (November 1993) established an 18-month process to achieve that consistency. As a two-county city, Bothell is especially concerned that all the agencies involve reach consistency in their policies to the greatest degree possible.

Thank you for the opportunity to comment. The City of Bothell remains committed to a cooperative effort towards regional planning and implementation of the Growth Management Act's goals and policies.

Sincerely,



William R. Wiselogle
Long Range Planning Manager

WRW/BJG/
H:BGKCCWP.LTR

King County School Coalition

Auburn, Federal Way, Kent, Lake Washington, Northshore, Renton, Riverview,
Snoqualmie Valley, and Tahoma School Districts.

February 27, 1994

Ms. Lisa Majdiak
Growth Management Project Supervisor
Planning and Community Development Division
King County Parks, Planning and Resources Department
707 Smith Tower Building
506 Second Avenue
Seattle, WA 98104

Re: Schools in the Draft SEIS for the Countywide Planning Policies

Dear Ms. Majdiak:

On behalf of the King County School Coalition, thank you for the opportunity to comment on the draft Supplemental Environmental Impact Statement for the Countywide Planning Policies. The Coalition will continue to review the SEIS with interest, and will present its general comments on this document at a later date. However, at this time, we wish to recommend a number of technical corrections to the SEIS.

15-42

On page 116, the SEIS states that Policy CO-14 of the Countywide Planning Policies (CPP) would mitigate the impacts of growth on schools by allowing existing schools to expand, thereby decreasing the need for new schools. In fact, Policy CO-14 was drafted with the explicit intent of authorizing new schools to be built in the rural area. Currently, King County school districts own a large number of school sites in the rural area. As discussed in the January 14, 1994, letter from the Coalition to Mr. Tom Fitzpatrick of your Department, the King County Council has repeatedly authorized the siting of schools in the rural area. (See attached) We agree that Policy CO-14 would mitigate the impacts of growth on schools, but for a different reason: The Policy, together with King County Ordinance No. 10525, would permit schools to be built on sites already owned by districts and on other suitable sites in the rural area. Where appropriate, districts may also renovate or expand existing schools, but the primary objective of Policy CO-14 is to authorize the use of tightlines to sewers and the construction of new schools in the rural area.

15-43

Second, the SEIS states that the process established in Policy S-1 for the siting of public capital facilities could have a significant impact on schools. (Page 117) However, this Policy expressly addresses the siting of higher educational facilities such as universities and their branch campuses, as well as other facilities of a statewide or regional nature, including airports and landfills. (See text on page 44 of the CPP) The siting of primary and secondary schools are not

Ms. Lisa Majdiak
February 27, 1994
Page 2

within the scope of this Policy, and the paragraph discussing the impacts of Policy S-1 on schools should be deleted.

15-44
We would also recommend that the information in Table F-1 of the Appendix be updated to reflect recent Council action. The King County Council adopted Ordinance No. 10982, authorizing impacts fees for the Kent School District No. 415, on August 27, 1993, and it became effective on September 6, 1993. The Council adopted the impact fee implementing ordinance for the Lake Washington School District No. 414, Ordinance No. 10790, on April 21, 1993, and it became effective on May 1, 1993. Finally, the Council adopted Ordinance No. 11148, authorizing fees for the Northshore School District No. 417, on December 9, 1993, and it became effective on December 19, 1993.

Finally, the SEIS repeatedly mentions the importance of cooperation between school districts and units of local government. We concur. As we stated at the recent meeting on the 1994 Annual Growth Report, school districts need additional information from King County on development patterns and trends, but the data should be aggregated by school district boundaries. The data is an important component of the capital facilities planning process to ensure that schools are available to serve the needs of new student populations. We also agree that "[c]omprehensive planners need to work with school districts to identify as early as possible land use needs for schools." (Page 118) We believe that a collaborative approach is vital in order to address the impacts of growth on schools, and the King County School Coalition remains committed to working with King County on these critical issues.

If you should have any questions, please call. Thank you.

Sincerely,

Grace T. Yuan

Grace T. Yuan
General Counsel

cc: Jim Reid ✓
Attachment

J:\CTV\1790-00\011SEIS.DOC

Jan. 25, 1994

Comments For Draft Supplemental EIS K.C. County/Planning Policies
Lisa Majdiak, Supt. Growth Management Project
K.C. Metro Parks, Planning & Resources Dept.
707 Smith Tower Bldg., 506-2nd Ave.
Seattle, WA. 98104

Subject: County Land-Use Planning Must Keep Local Resources in Community

The recently released Draft Supplemental EIS K.C. County/Planning Policies plan, outlining the next 20 years and mandated by the State GMA, deserves close scrutiny by area residents. It is mostly an example of feudalistic-type thinking and controlling of the populace with the masses confined to high-density, urban areas and privileged gentry residing in the countryside. Worse yet, this arbitrary drawing of urban-rural boundaries does not protect the organic functions of life supporting watersheds, natural flood-control sponges and wildlife habitat greenways. The long-term social implications of such segregation will surely be devastating to any true community spirit. In fact, this land-use planning document is totalitarian and elitist in it's origin and will only serve to further limit and erode any citizen-centered and inspired land-use management. However, the natural no-action alternative model would protect local resources, flavor and character better than attempting to change land-use patterns. What is your vision for your neighborhood for the next 20 years?

Review this newly released document at your local library. Send your ideas and comments to: Lisa Majdiak, Supt., Growth Management Project, Planning & Community Dev.Div., K.C. Metro Parks, Planning & Resources Dept., 707 Smith Tower Bldg., 506-2nd Ave., Seattle, 98104. Tel.:206-296-8640.

Fonda Rae Zimmerman
Fonda Rae Zimmerman, Kent
tel.850-3704

*P.O. Box 6515
Kent, WA. 98064*



Earl Clymer, Mayor

CITY OF RENTON

Planning/Building/Public Works Department

February 28, 1994

Lisa Majdiak
Growth Management Project Supervisor
King County Planning and Community Development Division
707 Smith Tower Building
506 Second Avenue
Seattle, Wa 98104

Subject: Comments on the Draft Supplemental Environmental Impact Statement for the Countywide Planning Policies

Dear Ms. Majdiak:

The City of Renton has reviewed the Draft Supplemental Environmental Impact Statement for the Countywide Planning Policies and has a number of concerns and comments about the document. Our comments are organized into several categories including: 1) Growth, Capacity and Urban Centers, 2) Compliance with SEPA and Adequacy of the Analysis, 3) Water Supply, 4) Parks and Open Space, 5) Transportation and 6) General Comments. The General Comments section is coded to a copy of the draft document and pages are enclosed for your information.

Our major concern with the document is that it does not provide an adequate or reasonable analysis of the various alternatives and their impacts. The document does not provide information in a way which can be used to objectively compare alternate approaches and make informed and responsible decisions. The document appears to make conclusions based on inadequate information, broad generalizations and assumptions. Most of the analysis is too general to provide very useful distinctions between the alternatives. The City of Renton strongly supports a more careful comparative analysis of each alternative.

Our specific comments are attached in six enclosures for your inclusion in the review of this project. If you have further questions, please contact Rebecca Lind in Long Range Planning (277-6188).

Sincerely,

Gregg Zimmerman

Gregg Zimmerman, Interim Administrator
Planning/Building Public Works Department

RECEIVED
MAR 1 1994
FOOD
postmarked
2/28

LA-2 B

GROWTH, CAPACITY AND URBAN CENTERS

1.

The DSEIS analysis is based upon 20 year forecasts of growth. The amount of growth cited throughout the document is 325,000 people, 215,000 households and 340,000 jobs and is based primarily upon Puget Sound Regional Council forecasts for the year 2010. Information on existing employment and households is primarily based on the 1990 Census and 1990 State of Washington Department of Employment Securities information. Information on capacity is based primarily on 1991 zoning. The base information and forecasts contained in the document cover a 20 year period stretching from 1990/1- 2010.

The CPP will not be adopted until July 1, 1994 at the earliest. A 20 year time horizon would from that point would be the year 2014. The analysis, however, is based upon a 20 year horizon starting in 1990 and ending by 2010. The document does not consider the effects of 4 years of additional growth on the analysis.

This is of particular relevance to issues of capacity and maturation of urban centers. Growth which has occurred between 1991 and 1994 has consumed some of the capacity identified in the King County Technical Forum. This reduces the capacity of the plan to accommodate growth occurring between 2010 and 2014. In addition, the analysis of urban centers is based on growth forecasts for the year 2010 and does not account for the effects of growth between 2010 and 2014 which could result in additional growth within urban centers.

These considerations could have a significant effect upon conclusions about adequate capacity and feasibility of Urban Centers and should be specifically considered in the DSEIS.

2.

Chapter 1.0 indicates that the analysis of capacity is based on "current zoning". This is an inaccurate statement. The capacity analysis contained within the document for the City of Renton is based on 1991 zoning information. In July 1993, the Renton City Council adopted a new zoning code and zoning map based on the Interim Land Use Element. As a result, the capacity analysis contained within the DSEIS for the City of Renton is not based on "current zoning". The term "1991 zoning" should be substituted for greater accuracy.

3.

A preliminary estimate of capacity for the City of Renton under the Interim Land Use Element has been completed. This capacity analysis indicates that, under the Interim Land Use Element, Renton could accommodate 1,877 additional single family units and 11,156 new multi-family units (of which 7,402 would be located within the Proposed Urban Center). This analysis also indicates the capacity for 33,228 additional jobs including 5,970 located within the Proposed Urban Center.

City of Renton's Comments
Attachment 1

LA-2

LA-2

LA-2

This analysis is not as detailed as the estimate prepared for the Technical Forum nor does it follow the same approach. In some respects, this analysis is more conservative than the capacity analysis done for the Technical Forum because it does not include the capacity of small vacant parcels less than one acre in size. It also assumes a 50% reduction for redevelopment parcels. Within the Urban Center, however, this analysis relied upon a 2:1 ratio of allowed density to existing density to identify redevelopment parcels instead of using the 2:1 land value to improvement value ratio agreed upon by the Technical Forum. This revised approach is based on the assumption that land values will increase substantially based upon the effects of an 8 or 14 Centers approach on the redevelopment potential within Urban Centers.

The suggested 25% cushion beyond capacity is primarily assumed to be included within the 50% deduction for redevelopment as well as through density bonuses allowed by zoning so no additional deductions for the cushion are considered necessary. Other measures which are being considered to help ensure an adequate cushion include increases in maximum density within single family land use categories and allowances for accessory units.

The revised capacity analysis, while not as rigorous as the one prepared for the King County Technical Forum, provides a sense that, while employment capacity has remained relatively constant, the capacity for housing development has increased significantly since the King County Technical Forum analysis.

In addition, the City of Renton is proposing amendments to the boundary of the Urban Center and the Zoning Code that will ensure adequate capacity within urban center boundaries to accommodate 50 jobs and 15 households per gross acre. The specific adjustments to urban center boundaries, capacity and growth targets will be forwarded to King County as soon as they are approved by the Renton City Council.

The analysis of the 8 Centers Alternative in Chapter 1.0 (page 28) concludes that capacity within the proposed Renton Urban Center falls well short of the capacity required to support center development. Based on completed and proposed changes in zoning and the preliminary capacity analysis based on that revised zoning the capacity within the proposed urban center does not fall significantly short of the level needed to support center development and this conclusion is inappropriate and inaccurate. The change in the capacity of the plan since the Technical Forum analysis and its effect on conclusions about capacity should be noted within the document.

4.

Chapter 1.0 (page 36) The analysis of the 8 Center Alternatives provides a comparison of existing densities within the proposed centers. This analysis specifically mentions the low existing residential densities within the Renton CBD. No mention is made in this analysis, however, of other centers (SeaTac and Bellevue) with similar low existing residential densities. This does not provide an accurate comparison of centers and gives a distorted impression that Renton is the only proposed center with low existing residential densities. It is inappropriate to

make singular reference to the densities within the Renton urban center without full comparison to all other centers, especially those with similar densities. A complete comparison of existing job and household densities should be prepared for all centers for the purposes of comparison and evaluation.

5.

Chapter 18.0 (page 204-206) The DSEIS analysis of the 8 and 14 centers alternatives is based upon a definition of urban centers which is not reflected in the Countywide Planning Policies. The DSEIS states that "An urban center is defined as an area with ... (b) a minimum of 15 dwelling units (DUs) and 50 jobs per gross acre. The Countywide Planning Policies, however, state that "Each center shall be zoned to accommodate (b) At a minimum, an average of 50 employees per gross acre ; and (c) At a minimum, an average of 15 households per gross acre."

The Countywide Planning Policies define urban centers as "areas of concentrated employment and housing ... designed to 1) strengthen existing communities, 2) promote housing opportunities close to employment 3) support development of an extensive transportation system to reduce dependency on automobiles 4) consume less land with urban development and 5) maximize the benefit of public investment in infrastructure and services 6) reduce costs and time required for permitting and 7) evaluate and mitigate environmental impacts. Policy LU-28 asks jurisdictions to " show intent and commitment to meet centers criteria".

Nowhere in the Countywide Planning Policies is there a specific required density which must be achieved to satisfy the goals for urban centers.

The analysis of the 14 Center Alternative questions the feasibility of 14 centers based upon growth projections and the DSEIS definition of urban centers which indicate that densities of 50 jobs per acre and 15 households per acre may not be achieved in all 14 proposed centers.

This conclusion is not compatible with the goals, definitions and requirements for urban centers set forth in the Countywide Planning Policies. Even if all 14 centers do not achieve densities of 50 jobs per acre and 15 households per acre the requirements for zoning capacity to accommodate those densities can still be met. In addition, even if all centers do not achieve 50 jobs per acre and 15 households per acre the goals of concentrated urban development which supports transit and reduces sprawl and its impacts is still viable. Therefore, it is not necessary to achieve densities of 50 jobs and 15 households per acre to satisfy the requirements for Urban Centers established in the Countywide Planning Policies.

In addition, this analysis assumes that the 8 Centers Alternative would result in Centers which would achieve 50 jobs and 15 households per acre. It cannot be assumed, however, that the 8 Centers Alternative would result in centers which achieved densities of 50 jobs and 15 households per acre. For example, Puget Sound Regional Council forecasts from December 1992 modelling the various alternatives indicate that even for the 8 Centers Alternative some Urban Centers

LA-9

LA-11(d)

LA-9

such as Bellevue, Renton and Sea Tac would probably fall below residential density levels of 15 households per acre.

Finally, the analysis implies that a decrease in the number of centers would increase the demand for growth in the remaining centers. Growth, however, is not necessarily transferable from one center to another especially over long distances. Each proposed urban center provides locational and market opportunities that would attract a certain amount of growth that would otherwise be located in non-urban center areas rather than other urban centers. A reduction in the number of centers does not necessarily mean that there would be growth that could be transferred to other centers to make them more feasible. For example, Puget Sound Forecasts from December 1992 indicate that the Bellevue CBD Urban Center would attract a similar amount of residential and employment growth for either the limited or expanded centers alternative and that a reduction in the number of centers would not produce an significant increase in the amount of growth located within the proposed urban center.

COMPLIANCE WITH SEPA AND ADEQUACY OF ANALYSIS

The SEIS is to be used as a tool to compare the impacts of possible amendments to the Countywide Planning Policies. The structure of this document makes the evaluation and comparison of the impacts of the proposed alternatives very difficult. It is questionable whether the analysis satisfies the intent of SEPA in terms of its presentation of alternatives, comparison of impacts and identification of potential mitigation measures.

The analysis does not designate a proposed alternative to serve as a benchmark with which to compare the competing alternatives. Instead, the analysis of alternatives is described as a continuum between the Pre-Countywide Planning Policies Alternative and the 14 Centers Alternative. Without a benchmark, there is relatively little sense of the relative location of each alternative along this continuum. The analysis provides few details of the magnitude of difference between each alternative. It is therefore hard to gauge how each possible amendment might differ from the option of taking No Action. The No Action alternative should serve as the benchmark with as much quantifiable comparison to the alternative amendments as possible.

The analysis frequently relies upon generalizations and assumptions to compare the alternatives. This analysis does not consider the potential impacts of the alternatives if the assumptions are incorrect. In particular, assumptions about feasibility and market acceptance as well as conclusions of infeasibility or lack of market acceptance are unsubstantiated and may be invalid.

In some places the conclusions, without quantification or substantiation, seem to contradict each other. For example, the analysis of shoreline impacts states that sprawl results in greater impacts on shorelines than compact development while subsequent analysis says that compact development will increase impacts on shorelines. The document does not provide a sense of the difference in magnitude between each of the effects.

Finally, SEPA asks that mitigation measures must be achievable and reasonable (WAC 197-11-660). The SEIS, however, identifies and relies upon mitigation measures which may or may not be achievable or reasonable. The document identifies mitigation measures such as superior urban design, incentives for redevelopment and pedestrian orientation which are general statements of intent and are not explicitly defined. Their achievability and reasonability cannot be measured or ensured. Other mitigation measures, such as increased open space or housing subsidization have significant public financing questions which are unanswered. In addition, some mitigation measures, such as altered setbacks, may reduce the achievability of other mitigation measures such as superior urban design and may therefore be counterproductive and unreasonable.

City of Renton's Comments
Attachment 3

Comments of Water Supply

A. GENERAL COMMENTS ON THE SEIS

1. An assessment of land-use impacts upon groundwater recharge should have been provided in the Water Supply chapter. The assessment is needed so that decisions regarding the alternatives can be made with knowledge of impacts upon groundwater-based water supplies. At least the following factors potentially resulting in loss of recharge should be assessed for both urban centers and the areas immediately surrounding them that will inevitably be impacted:

- a. Extent and general location of impervious surfaces;
- b. Sewering of areas that are presently served by on-site sewage disposal systems;
- c. Modifications to stormwater systems; and
- d. Loss of natural areas.

The SEIS should discuss the relative merits of methods to mitigate impacts upon recharge. For example, the maintenance of low density, low-impact development in urban separators is a mechanism to enhance aquifer protection efforts in urban areas. Engineering controls can be used to partially mitigate the impacts of development where low density, low impact development cannot be accommodated. Engineering controls include the following and other techniques:

- a. Aquifers may be artificially recharged with surface water piped from distant sources.
- b. Stormwater and septic effluent may be used to supplement recharge where this may be done without impairment of drinking water quality.
- c. The use of off-site and regional stormwater infiltration facilities offers an opportunity to mitigate the impact of development on ground water recharge.

Costs and other feasibility issues associated with the replacement of existing water supplies should also be discussed.

2. The SEIS states on page 127 that "Other independent water purveyors are evaluating whether there is adequate groundwater to meet the demands for increased water supply in their individual service areas." The implication is that the SEIS will not assess impacts upon demand associated with the alternatives. To our knowledge, groundwater purveyors are not involved in formally assessing the impact of the alternatives upon demand in their service areas nor has there been formal communication between groundwater purveyors and the Growth Management Planning Council regarding demand issues.

February 28, 1994
Page 2

The SEIS should demonstrate that groundwater purveyors can meet the additional demand for the chosen alternative. Lost recharge due to changes in impermeable cover or other impacts of development must be factored into this analysis.

3. The following statement is made on page 175: "Existing wastewater and drainage systems are degrading water quality thresholds and extensive capital improvements will need to be made in some areas to accommodate growth and improve water quality." This statement is too vague. What systems are degrading water quality and where is this occurring? Is the impact upon surface or groundwater? Is the impact upon drinking water or upon water quality in general? What evidence is provided to show that this is occurring?
4. Also on Page 175 a number of water quality programs are mentioned. The Ground Water Management Program of the Seattle-King County Department of Public Health in cooperation with the Department of Ecology, cities, and water purveyors should be noted. This is a very important local program to protect groundwater. Local governments must adopt or amend regulations, ordinances, and/or programs in order to implement Ground Water Management Plans following certification by Ecology in accordance with WAC 173-100-120.
5. It states on page 179 that the Ground Water Management Act is administered by the Washington Department of Health. We are not aware of an Act of this title. "Ground Water Management Areas and Programs" (WAC 173-100) is administered by the Department of Ecology. It is based upon RCW 90.44.400 "Regulation of Public Groundwaters".

C. COMMENTS ON THE FINDINGS OF THE RURAL CHARACTER TASK FORCE

Minor revisions should be made in RU-9 and RU-10 as follows:

"RU-9The tools to achieve this include: seasonal and maximum clearing limits; impervious surface limits; surface water management standards that emphasize preservation of natural drainage systems, and water quality, and groundwater recharge, and best management practices for resource-based activities."

"RU-10 Rural Areas shall be recognized as significant for the recharge and storage of groundwater and as areas necessary for the maintenance of base flows in rivers and streams, the and natural levels of lakes and wetlands and recharge of aquifers. Measures....."

City of Renton's Comments
Attachment 4

CITY OF RENTON COMMUNITY SERVICES ADMINISTRATION

PARKS AND RECREATION

MEMORANDUM

TO: Rebecca Lind, Planning

FROM: Leslie A. Betlach, Resource Coordinator *LB*

SUBJECT: REVIEW COMMENTS
DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT
FOR THE KING COUNTY COUNTYWIDE PLANNING POLICIES

DATE: February 28, 1994

Section 7.0 PARKS AND OPEN SPACE

AFFECTED ENVIRONMENT

IS-45

Page 119, Paragraph 1, Last Sentence states that the Parks Division recently completed the Parks, Recreation and Open Space Plan. Paragraphs 2 and 4 on the same page, last sentences, says the Park, Recreation and Open Space Plan has not been completed.

SIGNIFICANT IMPACTS

Page 119, Paragraph 1, same comments as above.

Although this document makes the assumption that concentrating growth in either the 14 Centers and Eight Centers will generally increase the need for parks and open space in urban areas and that in the No Action Alternative, Magnet Alternative, and Pre-Countywide Planning Policies Alternative the biggest impact on parks and open space will be in the rural areas, the City of Renton believes that all areas both rural and urban, will be impacted to a large extent.

At first glance, the idea of concentrating growth in urban centers creates immediate impacts and shortfalls of open space and park needs in the urban area. In concept this is correct, except that the increased pressures in the concentrated areas will flow over into the less populated areas. For instance, many cities are broken into several planning sub-areas for parks, recreation, and open space activities. Some sub-areas may have shortfalls while others may not. It is possible that there may not be sufficient space to allow for the increased needs and demands for parks

and open space in the urban or central sub-area. By default surrounding sub-areas would be required to absorb the additional needs generated by the increase in density in the urban area.

Lastly, greater emphasis should be placed on the value of the Urban Separator with its inclusion as part of any action. These corridors provide excellent wildlife/habitat linkages and also can create large expanses of passive recreational areas with opportunities for hiking, bird watching and education. The value of urban separators should not be understated.

Section 13.0 SENSITIVE AREAS AND RESOURCE LANDS

IS-5

Again the assumption is that the 14 Centers Alternative will have the least impact in the rural areas as the greatest concentration of growth will be in the central urban area(s). As indicated in the above comments, it is likely that the rural areas, by default, will have to absorb much of the increased needs and demands for recreation, parks and open space, created by the intensified urban areas.

If you have any questions, please contact me at X-5549. Thank you for transmitting a copy of the above-referenced document for our review and comment. We would like to be informed of any future developments as they arise.

cc: Sam Chastain
Bill Hutsinpillar
Jim Shepherd

driftseis

CITY OF RENTON
PLANNING/ BUILDING/ PUBLIC WORKS
MEMORANDUM

City of Renton's Comments
Attachment 5

PLANNING DIVISION
CITY OF RENTON

FEB 17 1994

RECEIVED

DATE: February 16, 1994
TO: Rebecca Lind
FROM: Sandra Meyer
SUBJECT: Review of King County SEIS for the Countywide Planning Policies

A review of the subject document has resulted in the following comments. Even though my review was concentrated on the Transportation, Air Quality and Noise chapters, I did look over the other chapters.

General

I have no concerns or issues with the material presented in the Transportation, Air Quality and Noise chapters. The comments below are primarily minor; relating to word omissions, typos and incomplete sentences.

Specific

1. Pages 24 and 25 are out of sequence.
2. Pages 23 and 24: The paragraph at the bottom of the right-hand column on page 23 when continued to the top of the left-hand column on page 24 does not make sense.
3. Page 77: The paragraph on "Existing Modal Splits" indicates existing transit usage in Renton is between 3 and 6 percent. This is contrary to PSRC data provided to the City of Renton staff which indicates one percent transit usage. This one percent figure is being quoted in the Boeing Longacres Office Park DEIS and other City of Renton documents.
4. Page 80: Check spelling of "installation" in third paragraph in left-hand column. Also on this page, should "or" in bottom paragraph in right-hand column be "of"?
5. Table 8, pages 84 and 85: Why is "Police/Fire/Emergency Response" called out at bottom of table?
6. Page 90: Last sentence in first paragraph under "The Magnet Alternative" does not make sense. Should the word "to" be added between "expected" and "increase"?
7. Page 93: In second sentence of third paragraph in right-hand column, should "proving" be "providing"?
8. Page 171: Last sentence of third paragraph under "Rural Character Task Force Policies" appears to be out of context with rest of discussion in this paragraph.
9. Page 192: Second sentence in second paragraph under "Motor Vehicles" (left-hand column) does not make sense.



Planning and Community Development Department
Michael Knapp, Director

February 25, 1994

Ms. Lisa Majdiak
King County Planning &
Community Development Division
707 Smith Tower Building
506 Second Avenue
Seattle, WA 98104

SUBJECT: DRAFT SUPPLEMENTAL EIS FOR KING COUNTY
COUNTYWIDE PLANNING POLICIES

Dear Ms. Majdiak:

In regard to the DSEIS for the Phase II work on the King County
Countywide Planning Policies, the City of SeaTac is submitting the following
DSEIS comments.

While we are supportive of your efforts to develop Countywide Planning
Policies which most cities adopted in 1992 including our City, in order to
provide the best possible long term benefits and mitigate the potential from
projected growth for the County and its Cities, the City of SeaTac herein
submits a number of broad policy issues that should be considered and/or
addressed in the DSEIS process.

KEY OR SIGNIFICANT DSEIS ISSUES

- 1N-1(a)
1. **INTEGRATION OF GMA AND SEPA**--While the purpose of this document typically should not only work to avoid lawsuits and to provide decision makers with a decision making process, it should also work to integrate GMA and SEPA. In terms of integrating the GMA and SEPA process, discuss how this document could be used to reduce the need for future environmental work for actions that are consistent with the policy intent of the document.
 2. **WHERE DOES IT ALL LEAD AND WHAT DOES IT ALL MEAN?**--While the document does a great job of quantifying data, it is difficult to grasp what it all means and where it leads us as a reader relative to the various alternatives. In the Final SEIS please discuss and evaluate in more graphic/descriptive terms how the centers would work and how they might develop during the planning horizon relative to those areas outside the urban centers. Also, discuss the comparative impacts and mitigation for the various alternatives in more graphic/understandable terms relative to the areas outside the urban centers. The DSEIS does not adequately address those areas outside of urban centers and needs to more fully describe and analyze those areas outside of the centers.
LA-9
LA-10
 3. **BALANCED VIEW OF SERVICE PROVISION**--The DSEIS does an adequate job of discussing the provision of services by King County but does not adequately address the provision of services by King County Cities. Please present a more balanced view of both the provision of services by the County and the various King County Cities.
 - 1N-1(a)
4. **GMPC POLICY CHANGES**--The Final DSEIS should include the full range of GMPC decisions finalized in the process such as the population and employment revisions, etc.

Thank you for the opportunity to comment on the DSEIS for the Countywide Planning Policies. While the City of SeaTac may or may not support specific policy proposals included in the proposed document, the City does support the environmental impact statement review process and the opportunity to provide input for the proper review of the mitigating measures for any and all of the various alternatives. If you have questions regarding these comments, please contact me or City Manager D. Scott Rohlfs.

Sincerely,



Michael Knapp, Director
Planning & Community Development
City of SeaTac

cc: SeaTac City Council
D. Scott Rohlfs, City Manager
Assistant City Manager

g: Cityman\COUNTYDS.EIS MTK/2-25-94

KAURI
INVESTMENT LTD

February 25, 1994

Lisa Majdiak
Growth Management Project Supervisor
Planning and Community Development Division
Parks, Planning and Resources Department
707 Smith Tower Building
506 Second Avenue
Seattle, WA 98104 FAX NO: 296-0119

RE: Comments on the Supplemental EIS on the Countywide Planning Policies

Dear Ms. Majdiak,

The biggest questions that need to be addressed in the EIS are:

1) What is the cost of the housing that will be produced under the proposed policies?
a) The EIS must address all of the costs including: the land, the infrastructure costs, the construction costs, the permit costs and the maintenance costs. The land costs for infill development are higher than historically used because of the competing uses for the sites in the centers. Current land owners will only be open to selling for demolition if you assume that the land will have the same or more value than the competing use that is already on the site. Due to these factors the land cost will be higher. High density housing also costs more to build.

2) How many residents of the county will be able to afford the housing?

a) The EIS should include a study of the median income of residents matched against the cost of the housing that is being proposed.

3) Will residents want the type of housing that is proposed?

a) After it is determined how many residents could afford the new housing, then we need to determine how many of those residents will want to live in the type of new housing that is proposed.

4) If new housing is not built to the level that is proposed then what will happen to the cost of existing housing?

a) The EIS should study the increased cost of existing housing if the supply of new housing is restricted.

Thank you for your consideration of my comments.

Sincerely,

James B. Potter
President



Christopher Vance
METROPOLITAN KING COUNTY COUNCIL
District Thirteen

February 25, 1994

Jim Reid, Manager
Planning and Community Development Division
Parks, Planning and Resources Department
707 Smith Tower Building
506 Second Avenue
Seattle, WA 98104

RE: Comments on the Draft Supplemental Environmental Impact Statement (DSEIS)

Dear Mr. Reid:

In addition to the public testimony presented before the Metropolitan King County Council's Growth Management, Housing and Environment Committee on the Draft Supplemental Environmental Impact Statement (DSEIS) for the Countywide Planning Policies, I and the staff of the County Council's Growth Management Housing and Environment Committee reviewed the document in order to provide comments. Specifically, we have focused on the Land Use chapter of the DSEIS (page 14 to page 58). These comments address general assumptions, graphic presentation and text editing. My comments on the DSEIS are summarized as follows:

- 1) A more detailed explanation of methodology for arriving at various growth target figures presented in Table 1 (page 6) and Figure 1 (page 7) of the introduction is imperative. These targets are the foundation of analysis throughout the DSEIS.
- 2) Page 16, second paragraph - comparing development patterns of a ten year period (1980's) with a two year period (early 1990's) is biased.
- 3) Page 22, near the top in left column, states that "...the analysis is intended to provide...a rough sense of how much zoning might have to change under the alternatives in order to accommodate the alternatives."

Jim Reid
February 25, 1994 - Page 2

LA-11(e) A more meaningful analysis would examine how much current development patterns might have to change under the alternatives in order to accommodate the alternatives.

LA-6 4] The first full sentence on p.24 disregards the power of the market in determining how much new growth will be channeled into the Centers. If possible, the impacts of the market and the state of the economy as compared to the influence of Countywide Planning Policies implementation should be evaluated.

HO-6 5] Pages 24 and 25 mention that King County's share of new housing units and lots applied for has decreased from 1990 to 1993 without implementation of the Growth Management Act. This would seem to cast doubt on the chances for successful implementation of the Centers concept. The impacts of land and housing price differentials between King and neighboring counties should be analyzed, at least from a historical perspective.

LA-6 6] "Least cost planning" has an appealing ring to it, but remains ill-defined. What might be the cost of providing incentives under the Magnet Alternative.

LA-1(f) 7] We really need to know what the locations and expansion possibilities of existing services are.

LA-6 8] Page 51, first paragraph of the right column proposes that huge mitigation is needed to offset higher land prices in centers. More context is needed to discuss the issue through a rough sense of just how much this mitigation might cost.

Graphical Enhancements

LA-26 9] On page 16, the description of the new rural areas should be accompanied by a map on the page, and areas (acres and/or sq. miles) should be uniformly used.

LA-26 10] The second paragraph under Rural Lands and Rural Cities on p.20 should have an accompanying chart. It is very difficult to make sense of the numbers presented within the text.

11] Tables 2 and 3 (pages 26 and 27) are difficult to comprehend. They are merely charts showing how to alternatively fit households and employment into various alternatives without examining the effects of

Jim Reid
February 25, 1994 - Page 3

LA-6
LA-47
LA-52

alternatives on the market. The relationship between the cited Tables 6 and 7 (pages 26 and 27) needs further clarification. Table 6 needs a source.

12] The maps in Appendix A-3 are very difficult to read. Colored maps of this information should be made available.

Text Editing

LA-48

13] On page 16, the commercial and industrial land trends mentioned don't connect with earlier statements. Are they talking about dispersed commercial development?

LA-49

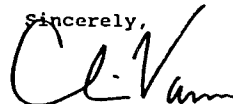
14] The sentences at the end of pages 23 and 35 drop off.

LA-51

15] Define "Auto-friendly" and "Transit-friendly."

I hereby request that these comments be officially incorporated into the FSEIS. If you have any questions with regard to these comments please contact Rebecha Cusack of my committee staff at 296-0330.

Sincerely,



Chris Vance, Chair
Growth Management, Housing and Environment Committee

cc: Kent Pullen, Chair - Metropolitan King County Council
Gary Locke, King County Executive
Members of the Growth Management Planning Council
Margot Blacker, Councilmember, City of Bellevue
Bob Edwards, Councilmember, City of Renton
Fred Jarrett, Councilmember, City of Mercer Island
Roger Loschen, Mayor, City of Lake Forest Park
Bob Stead, Councilmember, City of Federal Way
Shirley Thompson, Councilmember, City of SeaTac
Rosemarie Ives, Mayor, City of Redmond (ALT)
Sally Nelson, Councilmember, City of Burien (ALT)

Jim Reid
February 25, 1994 - Page 4



Christopher Vance
METROPOLITAN KING COUNTY COUNCIL
District Thirteen

Jim Gildersleeve, Councilmember, City of North Bend
(ALT)
Glen Kuntz, Mayor, City of Duvall (ALT)
Norm Rice, Mayor, City of Seattle
Margaret Pageler, Seattle City Council
Jim Street, Seattle City Council
Sherry Harris, Seattle City Council (ALT)
Brian Derdowski, Metropolitan King County Council
Larry Phillips, Metropolitan King County Council
Cynthia Sullivan, Metropolitan King County Council
Pete von Reichbauer, Metropolitan King County Council
Jane Hague, Metropolitan King County Council (1st ALT)
Larry Gossett, Metropolitan King County Council (2nd
ALT)
Pat Davis, Commissioner, Port of Seattle
Members of the Metropolitan King County Council
Maggi Fimia
Bruce Laing
Louise Miller
Greg Nickels
Ron Sims

February 25, 1994

Jim Reid, Manager
Planning and Community Development Division
Parks, Planning and Resources Department
707 Smith Tower Building
506 Second Avenue
Seattle, WA 98104

RE: Comments on the Draft Supplemental Environmental Impact Statement (DSEIS)

Dear Mr. Reid:

On February 9, 1994, the Metropolitan King County Council's, Growth Management, Housing and Environment Committee received public testimony, both oral and written, on the Draft Supplemental Environmental Impact Statement (DSEIS) for the Countywide Planning Policies for which your department of Parks, Planning and Resources is lead agency.

I understand that this is the first time a Council committee has received public testimony on an Environmental Impact Statement of any kind. I placed this item on the committee agenda in order to provide an additional forum for residents of the county to comment on this most important issue. Specifically, I wanted to provide concerned citizens with an opportunity to voice opinions and ask questions which would assist in refinements to the environmental analysis.

The public testimony before the committee was very compelling and the large turnout at the hearing indicated a high level of interest in this debate. In my opinion, the testimony was very well balanced and helped to raise important questions on both sides of the issue. Addressing the questions raised during the hearing would be of great assistance in the preparation of the Final Supplemental Environmental Impact Statement (FSEIS). Therefore, I am transmitting to you, as the responsible official for the SEIS:

1. Copies of the official tape recordings of the Growth Management, Housing and Environment Committee 2/9/94 meeting.

Room 1200, King County Courthouse, 516 Third Avenue, Seattle, WA 98104-3272
(206) 296-1013 TTY/TDD (206) 296-1024 FAX (206) 296-0198

Home address: 9615 S. 203rd St., Kent, WA 98031 Home phone: (206) 852-4020

Jim Reid
February 25, 1994 - Page 2

2. A copy of the transcripts made from those tape recordings, and
3. A copy of the written comments that were submitted.

I hereby request that these be officially responded to in the FSEIS.

Specifically, I hope the FSEIS will answer some of the major concerns which were mentioned at our February 9, 1994 hearing. I have summarized the concerns as follows:

1. The DSEIS assumes that 40% of the household growth target and 74% of the employment will be accommodated in the 14 urban centers alternative (Tables 2 and 3). The most current information assumes 27% of the household growth target and 55% of the employment target will be accommodated in the 14 urban centers alternative. What effect will this change have on the analysis?

The fourth limitation to the DSEIS analysis on page 3 states that "Ultimately, jurisdictional allocations will be developed by King County and its cities working together. This would result in revised targets that will need to be compared with the targets used in this SEIS. There is the potential for different outcomes or impacts [emphasis added]."

The DSEIS needs to be reviewed for different outcomes or impacts based on the revised targets.

2. Land Capacity (residential and industrial) - the data relied on to determine land capacity assumed achievement of maximum capacity under current zoning. What do we currently achieve in terms of existing density compared to maximum zoning capacity? What about environmental cleanup and redevelopment costs? The SEIS assumes that 35 to 65 percent of new growth will be redevelopment despite Fiscal/Economic Development (Fis/ED) Task Force work questioning this assumption.
3. Simply dividing up the 20 year population and job forecast among jurisdictions in large part based on their "wish list" does not make good sense. Target numbers should take into account jurisdictions' individual comparative advantages and contribute to efficient use of limited regional resources and to a coordinated regional economic strategy.
4. Impacts depend on the degree to which implementation of the various alternatives is achieved. If the 8 and 14 centers alternatives are not implementable due to market, financial or other constraints, they are not viable alternatives.

Jim Reid
February 25, 1994 - Page 3

5. There is no compelling evidence that greater concentration of development in urban areas results in greater efficiency and cost effective delivery of utility services. This is one of the basic tenets used to support the centers concept. To the contrary, testimony from representatives of Washington Natural Gas and Puget Power indicates that it is more expensive for them to serve areas of higher density.

- IS-B
6. References in the DSEIS to the 1985 Seattle Water Supply Plan are out of date. The discussion should be based on the 1993 Seattle Water Supply Plan.

- IS-6
7. The Water Supply chapter needs to state more forthrightly that new water sources will be needed to support economic development strategies and continued population increases no matter how successful conservation efforts are.

8. The DSEIS consistently refers to centers as being based on high capacity transit; yet, there is no meaningful analysis of the impacts of the regional transit plan on centers.

- IS-6
9. There was no discussion of groundwater as an important source of water for King County. Groundwater supplies 22 percent of the urban population. This source needs to be protected from contamination and the reduction of the urban aquifer recharge areas which would result from inappropriate placement of high density development.

- LA-11(a)
10. The DSEIS has an underlying pro-centers slant which appears to pre-judge impacts without substantive analysis.

- LA-6
LA-13
11. Growth Management involves a balance between land use, infrastructure and financing. The DSEIS doesn't attempt to investigate the potential environmental and financial impacts associated with redeveloping contaminated industrial lands and costs of remediation, need for new water sources to support growth, and costs and feasibility associated with making urban centers attractive and inviting.

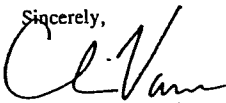
- LA-12
12. The Countywide Planning Policies and Rural Character Task Force recommendations treat the Rural Areas as unchanging and permanent. This approach conflicts with RCW 36.70A.130 which requires counties to review, at least every ten years, its designated urban growth area.

- LA-53
13. The characterization of centers development as being invented as part of the Growth Management process is not correct. The 1964 King County Comprehensive Plan acknowledged our eventual development as a multi-center community. The 1985 plan confirmed that development pattern and is in fact a centers plan.

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If you have any questions with regard to these comments please contact Rebecha Cusack of my committee staff at 296-0330.

Sincerely,



Chris Vance, Chair
Growth Management, Housing and Environment Committee

cc: Kent Pullen, Chair - Metropolitan King County Council
Gary Locke, King County Executive
Members of the Growth Management Planning Council
Margot Blacker, Councilmember, City of Bellevue
Bob Edwards, Councilmember, City of Renton
Fred Jarrett, Councilmember, City of Mercer Island
Roger Loschen, Mayor, City of Lake Forest Park
Bob Stead, Councilmember, City of Federal Way
Shirley Thompson, Councilmember, City of SeaTac
Rosemarie Ives, Mayor, City of Redmond (ALT)
Sally Nelson, Councilmember, City of Burien (ALT)
Jim Gildersleeve, Councilmember, City of North Bend (ALT)
Glen Kuntz, Mayor, City of Duvall (ALT)
Norm Rice, Mayor, City of Seattle
Margaret Pageler, Seattle City Council
Jim Street, Seattle City Council
Sherry Harris, Seattle City Council (ALT)
Brian Derdowski, Metropolitan King County Council
Larry Phillips, Metropolitan King County Council
Cynthia Sullivan, Metropolitan King County Council
Pete von Reichbauer, Metropolitan King County Council
Jane Hague, Metropolitan King County Council (1st ALT)
Larry Gossett, Metropolitan King County Council (2nd ALT)
Pat Davis, Commissioner, Port of Seattle
Members of the Metropolitan King County Council
Maggi Fimia
Bruce Laing
Louise Miller
Greg Nickels
Ron Sims

TRANSCRIPT*

FEBRUARY 9, 1994

METROPOLITAN KING COUNTY COUNCIL GROWTH MANAGEMENT, HOUSING & ENVIRONMENT COMMITTEE PUBLIC COMMENTS ON DSEIS FOR CPP

CUSACK: On January 12, 1994 the DSEIS for the Countywide Planning Policies was released. According to the RFP issued by the Department of Parks, Planning and Resources, the purpose of the DSEIS is to provide more detailed description of the potential environmental impacts that could be caused by the Countywide Planning Policies and the alternatives. The DSEIS also addresses policy refinements being recommended by the Affordable Housing, Rural Character and Fis/ED Task Force of the Growth Management Planning Council. Comments on the DSEIS are due Monday February 28, 1994. To help the committee members and the GMPC members from the Metropolitan King County Council in determining whether the DSEIS provided the requisite level of analysis, staff was requested to arrange for a cross section of experts to comment on it. The order of panelists is listed on your agenda, subsequent to their comments there will be general public testimony.

PANEL #1 - AFFORDABLE HOUSING

Marcia Gamble-Hadley, King County Housing Partnership:

We appreciate the opportunity to talk to you about some of the ideas we have in reviewing the DEIS and will tell you that the Executive Committee of the Partnership is preparing a more detailed letter with our comments which will be to you by the 28th. Since 1989 the Partnership has focused its efforts on work force housing. Specifically we have tried to find ways to re-energize the production of housing that's affordable to working families and that has been our sole focus. We have participated in both the affordable Housing Task Force and Fis/ED and we support the intent of these efforts. We as a region are breaking new grounds and doing difficult work. We are attempting to anticipate and plan for the demands of the future and KCHP supports many of the principles which are at the heart of growth management such as efficient use of land, infrastructure and services and the belief that quality design can lead to higher density in both commercial and residential development. Literally thousands of hours have been spent by staff and members of the public in trying to craft this new rule but what we have put together is not perfect. Concerns still exist within our organization about some of the foundation assumptions of the very high density centers. In addition, specific areas of analysis merit further study. Employment levels projected for the centers and their effects on housing types, land capacity and yield, land cost, provision of adequate infrastructure needed to support these higher densities, household size assumptions, vis-a-vis the housing types that will be needed to house these new families and the housing density assumptions in the urban centers and the financial feasibility of these denser frequently mixed use housing types.

The first thing that I would really like to stress is that the vast majority of the 215,000 units that we anticipate to be needed under these policies will have to be built by the private sector. The industry is capable of providing

housing but what is needed are regulations to protect the public interest but which have been developed in concert with requirements of development, financing and construction. The private builder must be responsive to his buyer, renter and lender. Market acceptance is central to private industry. This is not to say that higher density housing will never be acceptable but the move to these densities will be a slow one just as the move to modes of travel other than single occupancy vehicles will be slow. Quality design and close work with neighborhoods and builders by planners and officials will make this move possible. Market and financial forces will ultimately determine whether or not the production goals will be met. Supply must keep pace with population growth in order to maintain the acceptable level of affordability that we are looking for out of these policies. Planning must not get so far ahead of the market that it results in exactly the outcome that we are trying to avoid, and that is escalating housing costs that leave our families behind. Second, I think that we all realize that by limiting land supply that will drive up land cost and therefore the cost of housing and that is something which the DEIS is trying to address. But add to that cost which we accept as something that will escalate because of the growth management requirements. The cost to install infrastructure in many areas of our county that have not kept pace with the development over the last 10 years and the cost to develop housing will continue to outpace our families ability to pay for it. The SEIS made an assumption in its analysis that infrastructure was evenly available throughout the planning area, which is just not the case. Many areas slated for intense development have infrastructure which is woefully inadequate to support such densities. These costs and their impacts cannot be overlooked. Infrastructure was clearly an element of the Benson Glen Project, we started with \$17,000 a lot for raw land and ended up at \$46,500. That's 40% of the cost of a home for that family and that is a significant element in putting these policies together is to look at these kinds of analysis to make sure that we are not inadvertently pricing future families out of housing in the close end areas. These impacts are more serious on the starter homes than they are on homes that serve higher income so I would really stress the importance of looking at that layering of both land cost and infrastructure. Last, I guess that I would add that the cost will be significantly effected by process. While this is not an element of the study of the DEIS the hazard of regulation is a real one. Benson Glen clearly showed us the need for clearing up the current regulation to eliminate duplication, contradiction and the requirements that add cost without commensurate value. But there exists a very real threat that the administration of future regulations coming out of these implementation and mitigation activities will add further burden to the production of housing. We recognize and applaud the strong commitment stated by the county executive and the president of the council to bring about meaningful regulatory reform and we look forward to working with you on that and we appreciate the opportunity to give you a few of our thoughts at this time.

Ho-2

15-4

Dan Watson, Assistant Director, King County Housing Authority and a member of Fis/ED Task Force (His comments are his own and are specifically addressed to the Affordable Housing Chapter):

Ho-1 In general, I am was disappointed with this chapter of the draft SEIS. I don't believe it is adequate to the task at hand that it does not provide sufficient information for policy and decision-making purposes. I believe that the initial section on the affected environment was a reasonable discussion of the housing trends and so forth. But I believe that the next section on impacts was vague and inconclusive and it really didn't offer too much in the way of differences in the various alternatives that are before us. We've had considerable testimony before our own task force and we've also had case studies examined which would indicate that there are significant impacts that I think need to be carefully analyzed before we can make any policy decisions. I want to make it clear that I very much appreciate the complexity of the analysis and the difficulty in trying to measure and estimate potential impacts. But I don't believe that this in itself is a reason to suggest that the impacts are minor.

Ho-2 I think I will begin my discussion with a discussion of the main findings which begin on page 59. The first finding is that market forces have significant greater impact on housing costs than housing policies. While I believe that this is an obvious truism, I do not necessarily believe that it therefore follows that regulatory policies have no impact which seems to be the suggestion being made. The one finding that I disagree probably most vehemently is the second one. The distinctions and impacts are minor because of the greater impact of market forces.

First of all, I don't believe that this finding summarizes the contents of the analysis that follows later in the chapter. Basically, my reading of it was that the authors couldn't come to a conclusion but that it wasn't necessarily that the impacts were minor.

Secondly, I don't think that it's necessarily true, I do believe that land use decisions concerning densification will have significant impacts. There is considerable debate as to what those impacts are but to suggest that they are minor, I don't believe is correct. The other two findings had to do with the refined affordable housing policies and the mitigation measures that may be needed. Let me say first of all that I do support the refined affordable housing policies and I do think that mitigation measures will be needed but I think they need to be closely examined as far as effectiveness and cost is concerned. What troubles me is that I have a little difficulty reconciling the idea that densification and regulation have no or minor impact while affordable housing policies and mitigation seem to have a positive impact. Those two ideas I can't really reconcile with any consistency.

LA-9

Just briefly, a couple of problems I have with the impact section. Its all based on the assumptions that under the various center alternatives which are the various densification plans that may be undertaken that the population remains the same in each. This is to say that the housing will be built in all of those scenarios. That the market will supply the housing. I believe that this dodges the essential question which is: will the housing units actually be supplied? Because that is what ultimately is going to dictate the cost of rents and house prices. Will people choose to live in the urban centers at prices and rents that ensure economic feasibility. The analysis in the SEIS assumes that low density housing outside the urban centers is 100% substitutable for high density housing within it. That is not to say that high density housing cannot work but I think that we need to have a clear and complete understanding of market forces as they relate to location and density before we can make any policy decisions about which alternative works best. Perhaps a more appropriate question might be: what is the demand for high density housing in the urban center and what can be done to influence people's decisions to live in urban centers? So I would be the first to agree that market forces overwhelm a lot of housing policy choices, but what happens when policy is inconsistent with these market forces? What happens if we put all our housing eggs in the high density urban center basket only to learn that market forces reject this type and location of housing? The bottom line is that we can't assume just because we plan it, it therefore will be built. We have to understand and analyze the housing market and I am concerned that by constraining the supply of low density housing outside the urban centers we could have very negative impacts on the cost of housing. So I think those are the issues that we really need to focus on and I believe that that section of the report really needs some reworking.

Keith Dearborn, 2 Union Square, Seattle (speaking as an individual)

First of all I am here to speak to what is not in the EIS that I think needs to be for you to have an informed decisions. And I'd like you to turn to page 3 when you review the EIS to see its limitations. They are quite candidly stated. Marsha has spoken to one and that is the artificial assumption that wherever growth will occur in King County, infrastructure will be there and be financed to serve it. In other words, the EIS makes no conclusions or analysis based upon what it is going to take to provide the infrastructure whether it's roads, schools, parks, police precincts stations or you name it in terms of services. I would also like to begin by commending the council for its leadership. It's because of Ms. Sullivan and the current members of this council who were on the previous council that were here today. Ordinance 10450 was passed in June 1992 embarking us on this phase of work that led to this documents. In my opinion, this document and a series of documents, but this document particularly does not meet the promise of Ordinance 10450. It does not even come close. I am here to ask that the final EIS meet the commitment you made to us when you did embark on this process. Specifically, I want to focus on one element of the EIS that is

LA-7

missing. That is population and employment targets by jurisdiction. For those of you that are planners, you know that the engine of growth management is population and employment growth. It is the driver, it is what determines the infrastructure requirements, it's what the private sector uses to decide where and when to begin its housing. Every decision relating to growth depends upon your assumption as to where that growth will occur. That information was not available for the draft EIS. The authors thought much like someone who had to have their hands tied behind their backs, were constrained and crippled from doing a meaningful analysis because they did not know at that time what the population and employment forecasts were going to be jurisdiction by jurisdiction. We now have that information. You as members of the GMPC will be considering it in March and it was published for the first time in mid-January. It radically changes the assumptions of the draft EIS. For example, in terms of population, the draft EIS assumes that 40% of our population growth will house itself in 14 urban centers. The current forecast that staff has prepared says that no more than 27% will be housed in urban centers. Now some might say that's fine tuning but that's almost 30,000 people, that's equal in size to Issaquah plus a good share of Renton. It's a major amount of people that have to find housing opportunities outside the centers. Regarding employment, the EIS assumes 74% of our employment will be located in centers. The new numbers say that will be more like 55% that will locate in centers, that's a 62,000 job decrease. That's twice the employment forecast for all of Kitsap County for the next 20 years. These are big numbers, they are not small numbers. They have to be reflected in the analysis. Let me give you an illustration of the type of analysis that I think is needed for people to meaningfully understand the impacts of what you are considering.

LA-9

I have taken the new forecast, not what's in the EIS, but the forecast that has been recently prepared but keep in mind this is 27% and 55% of our total growth. It's a very small part of our total growth. But this is the growth that is now being forecast for the 14 centers in King County and I've simply done what anybody would do if they were trying to understand what the impacts of that growth are. I converted it to dwelling units and then buildings. I used assumptions that the industry is using for what you can do in a mid-rise residential tower in a city and what you can do on a floor of an office building in a city. I used assumptions for an office of 100 employees per floor and the range in Seattle ranges from a low of about 60 (my law firm) to a high of about 220. But 100 is about average for a downtown office floor. I just divided that number into the number of people and that told me how many floors I'd need in terms of office space over the next 20 years. Given the forecast, center by center. Similar assumptions were made for housing and I would just ask, not to put Ms. Hague on the spot but she was on the Bellevue Council when the Bellevue Comprehensive Plan was adopted in December. Did you know that you were going to have to accommodate 22-24 story residential towers in downtown Bellevue when you adopted that plan? Or six more CDB office buildings in Downtown?

No, nobody knew that nor does anybody realize that in the downtown CDB we would have to have 43 residential towers to accommodate the forecast that is being proposed or 18 more office buildings assuming there is a cap. That's assuming a 35 story office building. No one I think can look at these numbers and believe with any seriousness that Renton is going to come up with room for 27 residential towers over the next 20 years. They are not going to do it. But if they don't do it they are going to have to house that population projection in some kind of a building that is lower than the 20 story residential towers. Either that or the forecasts are not correct. They are mis-estimates of what's going to happen in centers. This analysis is not suggested to tell you what is going to happen but is to illustrate to you, what in my opinion, you need to understand before you make your decision on countywide planning policies. The assumptions need to be verified and then once you know how many buildings you are going to need in downtown Bellevue, of a residential type, you need to know how many school rooms you are going to need in downtown Bellevue. You need to know what kind of services you need because residential represents no more than about 40-50% of the land use in a city. The rest is jobs. The rest is services. The rest is roads. Most people would say you couldn't put 22 buildings in downtown Bellevue and even if they didn't generate any cars you still couldn't move 20 years from now in the peak hour. Those are the kinds of things that you have to analyze. I don't think this is asking too much. This is just basic common sense. It's the kind of information you expect a private applicant to provide before you approve their project. We're not asking for the same level of detail but with this information every school district can tell you what the impacts of the centers concept are. If you read the EIS, the EIS says we can't tell what the impact on school systems is but you should know that shouldn't you, before you make your final decision. Same goes for police, fire, same goes for the road system that is going to serve, the rail system that is going to serve it if rail is in the future or the bus system. This is the kind of information that I think is needed that is not in the EIS.

(.....INTERNAL COMMITTEE CONVERSATION)

(PUBLIC COMMENTS CONTINUED)

PANEL #2 - MAJOR EMPLOYERS

BOB GILLESPIE, Puget Power

15-4
Thank you Chairman Vance. Good Morning, Bob Gillespie with Puget Power also today acting as a member of SEIS Advisory Committee and Fis\ED Committee, and the various subcommittees like the Benchmark Subcommittee and Economic Development Subcommittee. First a word about the process, I'm not maybe as concerned as many are about this process, but I'm accorded a unique perspective because I have been on the SEIS advisory committee and I have seen all the documents all along and in a sense helped guide the focus of the SEIS, and also I sometimes think process is what we make of it, if we need more time to examine something in detail we do just that. Again, I don't mean to diminish the concerns of the others, I just have a unique perspective in that regard. It's suppose to be an environmental document and it draws conclusions from the facts that help its analysis and I am sure those of us on the advisory committee might have wished to have steered the product in one direction or another. But that was not our role. First of all, as a member of the Fis\ED Committee and Fiscal Analysis Economic Development Committee, I was very pleased to see the affirmation of the economic development policies, and I encourage those of you who are members of GMPC to approve those as written. The group that put them together was very broad based. Labor, real estate, industrial, utilities and housing and the people who the crafted the policies I think were probably better schooled in the market affects, very knowledgeable about the employment impact of the policies, and really fully aware of the consequences. I support that fully. Now turning to comments on the utilities section which reflects my Puget Power bend. On page 151 it says: In general, it can be noted the more concentrated the development in urban areas where transmission and distribution systems are already in place the more efficient and cost effective the delivery of services. That statement is not supported by the facts, we really wonder where the conclusion comes from. We have undergone some very, very rigorous internal analysis of centers versus non-centers and we haven't even arrived at that conclusion. The answer really is very facility specific. It depends on the age, the location of the existing utility infrastructure in the right of way, whether the right of way exists or easements exist, there are too many unanswered questions. On page 152, in the second column, the third full paragraph down. There is the line that says, in densely developed areas where greater energy efficiencies can be realized. We do not know if greater energy efficiencies can be realized or is possible in the density development areas, and in one respect they are not. They would result in increased electrical demand in high rise buildings in the downtown urban centers, that cannot be supplied by natural gas. See the technology does not exist to provide that sort of space heating in those buildings.

On page 153, there is a statement that says, Policies RU-12 is consistent with the Countywide Planning Policies that encourages agencies providing services to rural areas to basically protect public health and safety but not provide rural areas with urban facilities or urban level of services. The document doesn't define urban facilities or urban level of services, nor can we as a service provide distinguish between urban or rural level of services; 80.28.090 clearly prohibits distinguishing between those. One final comment, there are some assumptions in the EIS about the master utility permit process and I think those assumptions are premature because the conversations are taking place actually at this time about what the master utility permit process would look like. They involve a very cooperative effort over at DDES, Utilities and other service providers. And as a final comment, I think in our discussions with staff on the SEIS Advisory committee we disagreed a lot, but I personally have never being denied answer to my questions and I found them very cooperative in that regard. Thank You.

Gerry McDougall, Washington Natural Gas

Good Morning. My name is Gerry McDougall. I serve as Vice President for Special Projects for Washington Natural Gas. We're a privately held natural gas utility, serving 286,000 customers in King County.

Thank you for the opportunity to comment this morning.

IS-4
Washington Natural Gas fully supports the goals of Growth Management to ensure that King County remains a great place to live and work--for us and for our children. Through involvement on the Fis\ED Committee and one-to-one work with the planners, Washington Natural Gas has been active in the Growth Management Act planning effort. Today, I bring you our comments on the draft SEIS. I appreciate the magnitude of the SEIS task, particularly given the aggressive timetable on Countywide Planning Policy adoption. However, I'm concerned that King County risks adopting policies that are based on good intentions instead of hard facts. This document is not an adequate tool on with which an elected official might make an informed decision on the Countywide Planning Policies.

Specific to our business, the SEIS discusses private utilities, but it does not provide any depth of information that would allow Washington Natural Gas to adequately assess impacts of the various alternatives on our company and on our ability to provide services to our customers--now and in the future.

The theme, as stated in the introduction of the utility section is "...the more concentrated development in urban areas...the more efficient and cost effective the delivery of utility services."

The Eight and Fourteen Center Alternatives are said to have the greatest potential for energy efficiency and positive impact on the delivery of utility services.

The "cost-effectiveness" or "affordability" of density has served as the underpinning of King County's Growth Management planning effort. But we do not understand how this "cost-effectiveness" or "affordability" can be achieved through high density land use. Everything we've studied says there is a point at which increasing density increases cost of service and reduces efficiency.

Our experience within our service area drives home this point--our operations and capital costs are the highest in densely populated areas. It costs more to serve gas customers in Seattle than in Bellevue; and it costs more to serve gas customers in Bellevue than in smaller cities; and so on.

This is true not just in King County, but throughout the nation. We've looked at operations and maintenance costs for natural gas utilities nationwide. Cities with greater densities --- greater populations per square mile and more utility customers per square mile tend to be more expensive places to serve gas. We suspect the same is true for other utility service providers.

These higher costs of density don't end with natural gas service. If you look at cost of living indicators such as groceries, housing, utilities and transportation, the trend holds. Dense cities like Boston and Washington D.C. are more expensive places to live than Albuquerque and New Orleans.

I remain very concerned that these policies will make it tougher for our employees to find affordable housing within King County and will send prospective customers outside our service area to Skagit, Kitsap and Kittitas counties by artificially constraining the supply of land.

Before we buy off on a plan calling for significantly increased densities, let's be sure we take an honest, sober look at what that might mean to the residents and businesses of King County and what the physical, environmental, social, economic and political impacts will be.

I look forward to continuing to work with you and county planning staff to achieve a plan that can fulfill the vision of a strong economy and desirable living environment.

Thank you.

Jim Fitzgerald, Quadrant (Weyerhaeuser)

Good Morning. Mr. Chair and members of the committee, my name is Jim Fitzgerald. My address is 11100 Northeast 8th St., Bellevue. I'm also in the FisEd Committee and happen to be the vice-chairman of the Seattle/King County EDC (Economic Development Council), I'm speaking this morning on behalf of our parent company, Weyerhaeuser Real Estate Company, and Weyerhaeuser Company itself.

As a representative of Weyerhaeuser Co. I want to emphasize at the offset that we are committed to the implementation of the Growth Management Act. We recognize the importance of good planning not only for the benefit of our community but also for the economic prosperity of our companies and it's employees. What frustrates us however, is unrealistic planning, strategies which produce unclear standards and leave us with an impossible task of gaining even the most simple project approval here in King County.

We have an opportunity in implementing the Growth Management Act to develop realistic plans for the benefit of our community and to correct these deficiencies. Please don't misconstrue our criticisms of the interim Countywide Planning Policies as criticisms of the people who have worked so hard on this process. I have come to know many of these individuals through the process, and I respect their dedication.

What it is needed, however, is a better framework, and a more incentives based direction in order to address the uncertainty and confusion in our current land use system. We should not adopt Countywide Planning Policies, which cannot be implemented. We cannot adopt a comprehensive plan which cannot be administered. It is natural to bring this process to close after so long a time and so much work. However, as a result of all the work to this point, we have learned a number of things about the proposed policies. For instance, the land capacity calculations which have been used up to this point have assumed maximum density yields. What our experience in this County over last two decades has demonstrated that this assumption is totally unrealistic.

Secondly, the EIS acknowledges that there is a shortage of suitable properties for the kinds of entrepreneurial businesses which are developing in this county at the present time. High tech, software, bio-medical, and so forth. And yet there is no alternative strategy developed to deal with this important issue.

Third, there is a great deal of confusion in the policies with respect to the urban growth areas. The intent of the Growth Management Act was not to create a Berlin wall around the cities and the county. However, we see very few incentives in the policies to encourage growth in the appropriate locations. Most importantly the centerpiece of the interim policies is urban centers linked by rapid transit. It now appears, and Keith talked about it

LA-1(a)

EC-16

earlier, that the target number for populations and employment are not realistic and that the plan for rail may be delayed, if implemented at all. Further issues will arise when the Fiscal Impact Analysis becomes available and we address the issues of concurrency, infrastructure financing and who will pay. The costs under any of these scenarios will be high and they must be shared by all.

Growth Management deals with dynamic markets, not just with maps, statistics and physical design, and yet the draft SEIS acknowledges that market forces were not considered during the development of the Countywide Planning Policies. Instead of planning for what we think people should want, the Countywide Planning Policies's need to incorporate the range of options that the market demands, and develop centers consistent with realistic market forces. We also need to be practical and realistic about what the County can implement. To do otherwise simply creates more uncertainty for the public, additional administrative costs and confusion.

Weyerhaeuser has been doing business in King County for over 90 years. As the County's largest private land owner by far, obviously, we have a great deal at stake in the Countywide Planning Policies and the comprehensive plan. Our businesses range from a need to protect resource lands, to developing affordable housing master plan communities, and businesses centers for a variety uses including, high-tech, medical, office and industrial.

We strongly recommend that the final adoption of the Countywide Planning Policies and the comprehensive plan be delayed until all pertinent information is available, and proper decisions can be made. Let's us not be a slave to the July deadline. The State must acknowledge the tremendous amount of work already accomplished and allow the job to be finished properly without penalty. To think we can adopt these policies and then amend them as additional EIS and fiscal information becomes available is unrealistic. Quadrant, particularly, is all too familiar with the process of amending policies once adopted. It doesn't come easy, so we should do it right the first time, rather than try to meet an arbitrary deadline. As in the past, we stand ready to make ourselves available to assist in any way possible. Thank you.

Tom Rankin, Immunex Corporation

I'm representing two organization today. First, Immunex Corporation who I work for as the Manager of Public Affairs. We employee about 800 people, primarily in Bothell and Downtown Seattle. I am also the chairman of the Board of the Washington State Biotechnology Association. An association of 104 corporate members including 65 tech companies and other research institutions and service providers. Currently there are about 5,000 employees in the State working in the area of biotechnology. The Department of Trade and Economic Development told us some time ago that

they believe there is about a 2.5 multiplier which means for every single direct job in biotechnology there are 2 1/2 indirect jobs. And they also believe that sometime in the next 10 years we may approach 50,000 people if all goes right in terms of total employment. We are very concerned about the potential for growth and the ability of King County to accommodate that growth. Our concerns fall into four different categories. First, the housing policies; second, the manufacturing policies; third, office park and business park policies; and fourth, infrastructure. Biotechnology historically, and we hope in the future will provide a lot of really good, high paying environmentally sound jobs in this area. The people that we employ primarily tend to be young and interested in having a good family area to live in. And we are concerned that this policy does not necessarily look at those kinds of needs with the adequacy we see as important. We think that the Countywide Planning Policies will produce a surplus of expensive homes which will not be particularly useful for our employees. We are concerned that the density requirements in many parts of the plan will not provide the needs of the families that have indicated a need for single family kinds of homes with yards and so forth. And we are concerned that in general that the SEIS has failed to consider current and future market demands by housing types and we would like to see that better addressed. In terms of manufacturing sites, frankly speaking, we don't see that there is enough land available for future development needs. Biotechnology really falls into two kinds of phases. In the early phase, there is research and development into office labs, that takes up to 10 years and up to \$350 million to provide and then we get a product approved by the FDA. Prior to the approval of that product we have to build manufacturing sites and that is very competitive. There is some almost silly competitive jurisdictions around the world and around the county. Rhode Island offered one Seattle company basically 75% cost of capital to build a plant. The Netherlands, I understand will pay about 85% of the first year salary of a Dutch employee and will pay about 25% of the capital cost. Puerto Rico is famous for its Section 936 tax deferral. Now we're in a very, very competitive environment and as far as we can see in terms of this plan, we are not really in the ballpark in terms of providing access to those kinds of jobs. Business and office parks, the interim Countywide Planning Policies prohibit the county and the city within it from expanding the land areas zoned for business and office parks. This restriction is on top of limiting manufacturing capacity to existing levels. The Puget Sound Hearings Board and the King County Council temporarily overturned the policy. The City of Seattle wants its restored. Suburban Cities Association wants to give cities the flexibility to do as they see fit. We would suggest that these projections of a 10% growth rate in light manufacturing will require an aggressive program to build office and industrial parks. Immunex, for example, is now located in downtown Seattle. We are planning a state of the art facility on a 29 acre parcel on Pier 88 between Queen Anne and Magnolia. Our new location is not one of the 14 urban job centers envisioned by your policies. We moved ahead with the site before Seattle revised its comp plan to comply with these new policies. If we had waited another 10 years to build our new corporate

headquarters we would not find much suitable vacant land in any of the urban centers to accommodate such a facility and we would find little in the way of business and office park capacity. Finally, in the area of infrastructure. We are concerned that the GMA requires local government to plan affirmatively for future growth including the planning and construction capacity infrastructure needed to accommodate new growth. And yet within this structure of the current system by limiting infrastructure, that can basically control the system. I appreciate the time to hear these concerns. We are to some degree an embryonic industry, although we have been around in Seattle for 10 years, many of our companies are just beginning to start looking at manufacturing and even in some cases, beginning to build offices and laboratories. We think we represent a good part of the future in this area and we hope you will bear our desires in mind.

(.....INTERNAL COMMITTEE CONVERSATION)

(PUBLIC COMMENTS CONTINUED)

PANEL #3 - COMMUNITY GROUPS

Pat Strosahl, Vision Seattle

From a community side people that represented the wide variety of opinion and geography; we have Jeff Clayton from the Woodinville area, Hollywood Hills. We have Maryann Tagney-Jones from Preston, Gwen Escher from the Kent area and myself from the City of Seattle and as you will probably hear there is a number of different viewpoints depending upon your geography but I think that there is a consistency that goes across all the lines first. So what I would like to do is defer to the other three in order, we'll go with Maryann, then Gwen, then I'll go and then Jeff.

Maryann Tagney-Jones from the Sensitive Growth Alliance of King County.

We figured there were two aspects to look at this morning. First of all, adequacy of the EIS; and second, which alternatives appeared preferable given the information therein. We felt that the range of the EIS was appropriate. We cannot get any less dense than existing conditions in the 1985 plan which is one end of it. It would be hard to get much denser than the 14 center alternative. So that would seem an appropriate high end. There are 5 alternatives in there which is more than you often get in an EIS. So the range seemed to cover everything possible. The underlying numbers came from the Puget Sound Regional Council. They are good, they are consistent with that throughout. The studies on which this was based, I heard called the other day on National Radio, one of the best studies ever done in this area. So I think we can assume the underlying information is correct and good numbers. I think some of the people who were looking at this early this morning were judging this by the standard level of a project EIS, a programmatic EIS doesn't get into quite that detail and some of the

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concerns they were looking at might well be addressed when we're looking at project level requirements. So, as a programmatic EIS, we feel that this best covers the appropriate range. The population that we are going to be housing is no longer the traditional population that used to demand a single family house with a yard and a place to park the car. The overall household size in King County is now less than 1.5 people which is a bit of a shock to rural people with kids all over the place. I think all that (unclear language) truth. And that we need to house that population. That population is not necessarily looking for the traditional ideas of housing. Apparently we now have fewer than 25% of all families who are two parents, two kids and a dog. The idea of housing those people predominately has to go and we have to look at what the single person, what do the couples, what do the single parent families need. And it appears that the higher density with this access to transit and jobs is something that serves the population of King County. We also have to remember that this document is part of a series, it doesn't stand alone. There are previous EIS's, there will be further work. It makes it quite clear within the document that it fits within a range of studies to help the GMPC make the appropriate decisions. It also makes very clear what the environmental impacts are in the traditional categories and it makes clear what the tradeoffs are. It is obvious that the less land you use, the fewer impacts there will be to traditional areas such as air, water, etc. But you may be increasing the impacts on people with the dense areas and those tradeoffs are studied in this document. We believe that the information is in there to craft a very acceptable alternative, a hybrid. We have looked at all of them. We basically dismissed the first two because they are old (unclear language). We were looking at the magnet alternative, the 8 centers and the 14 centers. We saw a number of problems with magnet, we felt that badly managed this could become business as usual. This could just be another nice name for sprawl. It could work but by the time you put all the regulations on it to make it work you've probably got urban centers of a certain type. There are things that would be needed to make magnet work. You would have to have a totally sacred urban line otherwise people would not use their land efficiently within that line. They would feel, oh boy, you could always go out. So people would never have to feel that, they would have to land bank within the line. They would have to phase their growth so that they would hit their benchmark and if they don't then they have got land available to hit it next time and make up for any shortfall. So you would have to have phased or ringed development within the line. You would have to have very significant urban separators, aquifer protection, you would need to have dollars available for the highway usage. You would have to be looking at ways to tempt people out of their cars when this is designated the auto friendly alternative. These are just some of the considerations that we felt would have to go into a magnet plan. And because these are so wide ranging, it seems more sensible to look at an urban center plan, maybe not the 14 because that forces the extra housing units into places which do not currently have that zoning but if we look at the 8 and say how can we take the best things from magnet and put them together with the best things from the 8 urban centers, is this

going to create a place where people, and we're thinking of this new population, these 1.5 households, is this going to be a place where they want to live. And we think the things that must be sacred in an urban centers concept is community participation and design standards. The people must be involved, they must say what they want to see and how they want the feel of their neighborhood to be and the budget dollars have to be there for the amenities that will make high density attractive.

Gwen Escher, 14097 SE 202nd Street, Kent, WA.

The temptation is great to just say ditto. Maryann has put it extremely succinctly. A great deal of work has gone into this and I just want to add one little piece. And that is to ask you to never underestimate the incredible impact and the societal needs when we do not provide a diversity and balance in our housing types. No where does this show up more than in schools. We have wonderful kids from houses, we have wonderful kids from apartments but the societal needs that are there when the population is highly transitional creates an incredibly strong impact on the community. So please, I ask you don't ever underestimate the critical need for balance. And I want to end by thanking the Council and staff who have put so much work into this project. It will service well for many years to come.

VANCE: Thank you Gwen and congratulations on the levy yesterday. It's good news for all of us.

NAME ???:

I would like to split my remarks into two sections. First off, I have reviewed most of the EIS and I want to make a few clarifications about the magnet alternative that should be revisited when the final EIS is done and then I would like to focus on some of the issues brought up by Gwen and Maryann. First off, the magnet alternative, I want to clarify, was an alternative that came out of the community side particularly Vision Seattle and some community groups in Seattle and others worked with that concept and then entered into discussions with the business communities which were having some similar problems with the centers concepts and the main issues that we brought to this were practical issues. What will happen, what is likely to happen, what kind of impact are centers likely to have and how politically viable are they. Many of these questions have, in a sense, no place in an EIS, there are the feasibility decisions that have to be made at the political level. The EIS I think is rightly an instrument in which you look at the comparative environmental impact and try to use that information to improve the alternatives. But ultimately one of the things that is clear out of the EIS is that the relative environmental impact of the variety of alternatives are not hugely different. Therefore, we in a sense, have a way of, as Maryann suggests, crafting an ideal one that can satisfy most parties. Its through the process of the finalization of the comprehensive plan. In the EIS, there are a couple of things that I want to make really clear. There was

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an arbitrary division of the county and to auto friendly and transit friendly based upon current Metro practices so the whole issue as analyzed in the EIS in a sense was arbitrary and needs to be reviewed in light of the new focus of the RTA on a more multi-modal and much more much generous range of options in our transportation choices. My own opinion, is that within the urban growth area, wherever we can achieve density for four or more per acre, we have potential transit and public transit options that can be used, and have been used successfully in other places in this county and others. The other thing that comes across in the magnet alternative is that the apparent misunderstanding that magnet alternatives have no community design review. There was a very conscious attempt and one of the centerpieces of the magnet alternative is that both community planning efforts of vigorous and rigorous community planning efforts that goes on in advance of development and a project by project community review prior to permit application in which design review standards and other issues can be brought up for discussion around the project. So, that we felt, to have the business community backing for that part was a significant step forward for creating a climate of trust and cooperation in development rather than one of division and polarization. Aside from those two, I think that the important issues that are addressed in the magnet alternative that need some focus, in fact, are I guess what you would say that Grace Byrnes suggests is a lack of vision in the magnet alternative which sort of means that it goes everywhere. In some ways, I want to correct that impression. First off, the misimpression is to assume that our current land use isn't organized. We have cities, we have towns, we have medium sized centers, we have large centers. Each of these is the magnet alternative based upon those existing land use structures, they are seen as incremental opportunities for growth that allows us to maintain a fairly restrictive urban growth boundary. Because we are going to the entire system and saying you act like a sponge, we're not going to design and force people into hot spots of growth. And this is where I differ with Maryann and with Maryann's analysis on the centers. I believe the centers are not. By the way, I've moved to my general comments now. The centers in a sense, on a practical level, we may be able to build centers over 50 years if that's a kind of lifestyle. But on a practical level they are simply not manageable over the next 20 years. I think we are making a false bargain with the population, with the public if we pretend to them that 50% or 40% of our growth is going to go into 8 hot spots or 14 hot spots around the region. In a sense the GMA asks each of us to make behavior changes, to make changes in the way we live in order to create a reasonable growth management system. What the magnet alternative suggests is that those changes should be small changes around the whole system. Everybody looking for a place that they can contribute their part, even in behavior, their own personal choices and in their neighborhood, how their neighborhoods can accommodate more growth. It says that light water conservation, as opposed to building more dams, that if you treat that as a capacity increase when its aggregated, you have a much greater chance of success and a much greater public commitment to the process. Partly because there's not big winners and big losers and partly

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because everybody can make a small change in their life, like recycling or like water conservation. It's very difficult for them to make the decision that they are not going to live in a house, that they are going to live on the 4th story of a high rise apartment. Those are mighty big changes that we are asking people to make and again I'm not suggesting that they can't be made but people resist big changes but they can accommodate small changes. So this, the magnet alternative, depends upon that. So that to me suggests in the magnet alternative, using the least cost principals, using benchmarking and monitoring to make sure its actually working and trying to design housing, as Gwen says, throughout the system for the variety of housing needs that are going to come online. I think is the most sensible approach and not an anti-center approach I guess I don't come here to bury centers I come to praise them. But the idea is that the centers have to develop at their own pace from where they happen to be and that we have to take the existing system to understand that there is an organized land forum made by personal choices. Some of those choices contribute to sprawl. We have to attack those problems that are contributing to sprawl across the entire system and try to compact our urban growth everywhere within the system.

VANCE: Mr. Strosahl staff would like you to just identify yourself for the record into the microphone.

Oh, yes, I'm Pat Strosahl, I'm from the Roosevelt neighborhood here in the City of Seattle.

VANCE: Thanks, and you have exactly five minutes left.

Jeff Clayton, 15116 - 164th Avenue NE, Woodinville.

I've come here today to talk in particular about the magnet rural character task force in the SEIS. I'm President of the Hollywood Hills Association and I'd like to tell you a little about that neighborhood and how it fits into the magnet. But basically, I've volunteered a lot of my time to help generate the magnet proposal, to work on the rural task force, to be president of the Hollywood Hills Association and I did that with the expectation that this planning process would at some point come to a stop and that I could pass the torch on to someone else. I cannot become a full time planner, I am not paid to be here like some of the attorneys, etc. I think that there is a real question of credibility and trust in government that this planning process just goes on and on. And that there also is a tendency for the neighborhood groups to have difficulty in being properly represented because frankly we just can't go on and on through this process. In any case, the magnet alternative particularly appealed to us, because to me, it recognized that both business and neighborhoods needs to work on the basis of incentives, of benchmarks, of competition, rather than forced growth. And what I saw the magnet as doing was recognizing that there are quality neighborhoods, other neighborhoods that are trying to improve. That there were areas that business would likely locate, for instance the Duwamish region in Seattle.

That all of us want to see Boeing's next plane built here in King County. At the same time, recognize that nationally and locally, many of us recognize that King County is a wonderful place as it is. It has roughly four broad bands of land as a federal and state recreational resource land far to the east but then has King County resource land and the watersheds for Tacoma and Seattle form another band. There is a lot of Weyerhaeuser land there. There is then a rural band and finally the urban band. I think that King County's vision should continue to support those four types of opportunities and that type of diversity and I think that we need to stop wasting time trying to move the urban rural line and make adjustments in this broad texture of the county and recognize that it is of great value to the long term desirability of this county. In terms of things that came up, for instance, in the rural character task force, I was not happy with all the product that we came out with but we recognized that especially being volunteers, that we had a timeline to meet. And we met it and we hoped that we could move through this phase 2 process on the SEIS as soon as possible. I want to emphasize again, the Rural Character Task Force, met the deadlines with the expectation that the elected officials would keep the process moving.

A little about Hollywood Hills. It is a neighborhood of, I guess brawny chateaus, in some people's minds, but it is also a neighborhood where people elect to move. People who want to have horses, want to have some aspect of rural living without having to have 10 acres of land to manage. We have, for instance, the co-chairman of the environment committee of the Hollywood Association is the CEO of an international corporation with the headquarters in Atlanta and he has chosen to live on Hollywood Hills and essentially do his work telecommuting to Atlanta. Many of the people on Hollywood Hills are attorneys, doctors, executives at Paccar and Boeing, biotechnology firms, founders of Microsoft, McCaw Cellular, in the Madison Group and others they can elect where they want to live and they have chosen Hollywood Hills. What the magnet alternative says is that this is a neighborhood of value and should be protected. One of those protections is the urban rural line and I hope that we will not extend a lot of energy and resources on reopening that but that you will recognize that getting rid of uncertainty is as important to the community groups as it is to the business community and that we need to move on to predictability and security and some local control. Thank you.

VANCE: If you have written comments, for all of you here, we would like to have them. Anybody and everybody, if you have written comments, to submit to staff that would be great. Thank you very much.

I would just like to point out that we have this room until 1:00 and we have about 25 people signed up in addition to the panelist and the vice-chair says, she's gone at noon and we will get through as much as we possibly can today and will consider holding this over until next week if that is necessary.

PANEL #4 - HOMEBUILDERS, REAL ESTATE INDUSTRY.

Gary Upper, private developer and builder for Conner Development.

Thank you Mr. Chairman and members of the committee. Thank you for this opportunity to comment on the DSEIS. My name is Gary Upper and I have worked as a private developer and builder for the last 15 years for the Conner Development Company and I also am serving on the Affordable Housing Task Force, sort of, but today I am here to speak as an private individual. First let me say that in a broad sense I am very disappointed in the quality of this document. It certainly doesn't do what I think it was suppose to do which was to dig in and provide a meaningful analysis of the impacts of the Countywide Planning Policies. On many fronts we are still dealing here with major disclaimers and wide acceptance of unsubstantiated and untested theories. We have a continued avoidance of the tough and obvious questions. I would like to focus my comments today on how the concept of capacity plays throughout this analysis and how it needs to be further developed before being used to draw conclusions. The Countywide Planning Policies attempt to achieve a number of objectives, by limiting where and under what conditions urban development can occur in the future. Capacity analysis is the tool used to reconcile these limitations on the one hand with the need to meet the GMA mandated requirements to produce a targeted amount of housing on the other. Understanding capacity has become important simply because we are choosing to intentionally limit it. The planning strategy invoked, for the moment with the GMPC, seems to be to go as far as we can with these geographical limitations without actually bringing our economy to its knees. If we are indeed going to follow this course, walk this tightrope, then it is extremely important to get this capacity business right. To do this the SEIS needs to go a lot farther than it has in clarifying what capacity means in the context of meeting the GMA mandate and then subsequently evaluating the capacity implications of each plan alternative. The SEIS currently rely upon the work of the growth management technical forum to gauge capacity. While the technical forum has done a credible job as far as it's gone with this concept, it simply hasn't finished the job, it hasn't gone far enough. The capacity projection shown in Appendix B and used extensively to draw conclusions. The land use section of the document needs to be further qualified for the following reasons, and this is at a minimum. First, housing capacity should be judged in terms on how well the potential supply meets the true needs of the market place. We've heard this before today. The SEIS simply tries to show that it can produce a certain number of housing units without regards to what they are or what they cost. If there is a poor match between what a particular plan alternative produces and what is needed by the consumer then we do not have adequate capacity and we are not planning to meet the housing mandate of the GMA. When that happens, the GMA says that we must change our plan. Do not doubt for a minute that these plans and policies have a huge affect on what we in the private sector can produce and how much it will cost. The market mechanisms that have worked in the

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past are no longer operating here. You the Council and the regulators are now manipulating the market. You have the responsibility that goes along with that. Second, infrastructure. The reasonable likelihood of infrastructure being available, meeting concurrency requirements should be a requirement before land is included as part of capacity. In short, if you can't use it, don't count it. If infrastructure planning is supposed to be part of this GMA process, if it ever get done then the land so served can be counted. Third, neighborhood resistance to increase density in the cities and developing suburbs must be factored in as a reality. Since increasing density virtually everywhere in the UGA is what this is all about, we all know that this will be a major factor. It has not yet been accounted for in the capacity analysis. Fourth, the specific nature of environmental expectations within the UGA should be clarified. Density and capacity expectations should be adjusted accordingly. Framework Policy FW and S3(unclear language) states that all jurisdictions shall protect and enhance, with emphasis on enhance, the natural light ecosystems through comprehensive plans and policies. This policy makes environmental goals a very high priority within the urban growth area. This would appear to be in conflict with the high density development goals for these same areas. The ultimate resolution of this conflict could tip in favor of density which would result in an increased impact on this environment or it could tip in favor of environmental protection which could result in a reduction of capacity in the UGA. In any case, this certainly is an issue that should be addressed by the SEIS and included in making capacity projection. Finally, I would like to point out that the Countywide Planning Policies specifically states that the designated urban growth area is going to be permanent. I want to make sure that you all realize that. The urban growth line is not conceived as a starting point subject to further adjustment but is a permanent solution. In the future, beyond the current 20 year horizon, all urban growth is to be accommodated within the permanent urban areas by continuing to increase densities. We will be evolving to an increasingly dense use of the original UGA. This would appear to raise additional questions regarding long term capacity, the long term impact on the environment within the UGA and ultimately our ability to realistically comply with the GMA mandates. If we are indeed committing to a permanently fixed UGA then these issues need to be evaluated now. I realize that there is pressure to complete this planning job and pass something into law in order to meet the deadlines imposed by the state but I would offer the thought that missing the state deadline is a lot smaller consequence than passing a set of ill-conceived policies, thinking that they will be fixed somewhere down the road. Thank you.

Chuck Lappenbush, 3418 - 76th Place SE, Mercer Island

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I am employed with Lozier Homes. I speak as an individual and I also speak as the industry because that is our responsibility to deliver houses and one of the issues that we are really concerned about is, what does this document do? This document is suppose to identify the impacts of our ability to deliver that housing. Our ability as elected officials, as communities, as homebuilders and as citizens, we've established some priorities and it is important to have this impact statement identify what impact on those priorities we have as we try to deliver the houses. First priority, I think everybody has agreed to is jobs. We have housing, then we have infrastructure. This document does not tell us what we have, what kind of impacts on the various priorities of roads, etc. that are needed in order to deliver that housing. Its suppose to help us in doing that. If we are addressing housing we're really talking about supply and demand and we've heard that many times this morning already. And one of the things I'd like to relate to in this document, to us in the building business, we call this market research and if it isn't done right, we can't move forward to the next step. This is not done right. We don't know how to make our decisions. And I say, we collectively, elected officials and in the community. We don't know how to make our decisions. We've talked a lot about affordable housing. We have to be affordable relative to other industrial and manufacturing centers throughout the northwest and throughout the world. We have to deliver housing and a lifestyle that the people want. We've heard people in fact, there seems to be a common theme this morning with reference to delivering what the market demands. Let's talk about the cost of housing and how it relates to our competitive worldwide. If the cost of housing is too high the employees have two choices, they either go to a lower form of housing and lifestyle which they don't want or they move out of the area. The employer then has an alternative of paying the employee more money so they can afford this housing. So doing that he loses his competitive in the world markets. So it does come home to roost. The demand side, we're talking about the demographics. There are no demographics in here, there's nothing in here that tells us what it is we as a community and industry are trying to deliver to the marketplace. We've all talked about the marketplace this morning but there is no identification in here. There is no identification as to what the impacts are, as to the delivery of that marketplace. Land capacity, Gary mentioned that if we don't have land capacity to meet the supply we don't have land capacity. We have capacity for what, if it isn't meeting the demand and we're talking about the hard infrastructure and the (unclear language) as well. I want to caution all of us, don't get caught in the steak and hamburger survey. And the steak and hamburger survey is simply, you ask people if they want steak or hamburger, they say steak, you watch them walk out the door, the cost of the hamburger (unclear language) because that's all they can afford. When we are doing market research we've got to be very, very careful that when people are answering the questions, they know what they are paying for and it's tough. This document does not do that. It does not do it in the

terms of transportation, infrastructure, lifestyle, etc. If you move forward to make decisions on growth management based on this document, you tell me how much money the public and private sectors of this economy are going to misallocate. It's got to be in the billions of dollars. You are our custodians. The only ones that can set that framework for us. We caution you to plant your feet, let's do it right. We don't have to do it wrong. There are things in here that are partway home but we're not in grade school anymore. We don't get an A, B, C or D. We either win or lose. We do it right or we do it wrong. So with that, as far as I'm concerned, there is only one thing to do with this document because it doesn't serve anybody and that's to attach a towel to it and throw it in.

Oscar De Moro

I represent six companies, but I don't expect 30 minutes but I found about it late Monday night and I've been rushing and scrambling to do something to present our points of view so bear with me here.

I direct development activities of Cosmos Development and Administration Corporation (Bellevue, WA). All my professional training has been focused to deal with urban environments (licensed architect, B.S. in architect, Master of Architecture and Urban Design). I have my whole life supported the ideas of growth management because I believe in the vital diversified urban center. I am also proud to call myself an environmentalist. I believe that we are stewards of the land and we must steward them to the next generation. I also believe that people and nature are not mutually exclusive. I do not consider myself an oxymoron, nor am I in the social minority. At Cosmos, we have been engaged in building growth management projects before such activity became mainstream chic. If you refer to the documents I've given you, I've selectively taken out and distributed some documents of a recent project. Since 1986 when we were formed as a company, we have built 1,437 residential units, 34,200 square feet of retail, 217,000 square feet of commercial office and 230,000 square feet of industrial. 95% of our projects are mixed use, i.e., those components are found in each one of our projects, in combination. 100% of our projects have been in urban areas. Mostly in city limits, the cities of Bellevue, Renton, Seattle and in urban areas of Pierce County. By choice none have been in unincorporated urban areas of King County. I want to comment on two aspects of what we are doing here. First, is the SEPA process and the other is the process of growth management as it applies to the building industry. First, SEPA is a well intentioned concept that I supported for a long time but whose time has come and gone. It is the single living undemocratic, unscientific, unpredictable, unaccountable process that terrorizes and conditions projects to death. SEPA, by default has thrown planning, zoning and environmental policy formulation on the shoulders of the project. The projects have become policy battlefields and bureaucratic delays the weapon on choice for project termination or conditioning. The beauty and irony of this is that the applicant is expected to fund his own demise. No one is happy with SEPA.

Ask anyone. The reality, to paraphrase and old military saying: we have met the enemy and they are us. We have stopped being reasonable with each others and we have brought the system to a standstill. As a company, we have spent millions of dollars in unnecessary studies, delays, mitigation, court challenges and self defense. The cost of doing business is too high and none of the cost of doing business is associated with environmental concerns. The project that I have given you, there is a common thread in each one of those. Each one of those projects has been appealed or had the threat of appeal associated with it. Except for the last two projects (Jackson Court and Madison Estates), we have had to settle after we have been conditioned by the counties and the cities we work in. After that conditioning we have had to settle with private mitigation, personal impact compensation of projects. We have had to deal with the super majority. If there is one person out there who disagrees with the project, that person can bring the project to a standstill. The common good democracy in SEPA is non existent. Under growth management, there is a terrible achilles heel in this whole process. You deal with policy yet you must force yourself to deal with implementation and accountability. We need to replace all that which was before us in the SEPA process with something new. Don't just put another bureaucratic layer on top of an existing layer. The foundations are rotten, the building will collapse.

VANCE: Mr. Del Moro, your panel has exactly four minutes left, could you please bring your comments back to the SEIS itself, it's very valuable what you're saying but we have a lot of people waiting and one of them is just to your left.

We have to stop having the yolk of satisfying the super majority by the lone individual as on the burden of the project. Don't club us into submission. We're not your enemies. Be careful how you draw lines in the sand on growth management. The old verbiage of 10 lbs of blank in a 5 lb bag. That's what's happening right now. You're setting us all up for failure. Affordability will never have a chance if you do not allow for enough room to meet projections and be careful how you are tinkering with lifestyles and expectations. I build in the cities but I live in the country. We here are the survivors of the over leveraged, over processed 80's. We have forced ourselves to structure and rethink how we do business. We are lean, we are competitive and we can be creative. You're going to ask us to implement the policies of growth management. Ironically, it is really your turn to be tested by the fires. It's not us, it's really you. Whether you wish it or not, you will be required to compete for the tax base in our communities. Business and industry is becoming increasingly mobile. Its reliance on place weakens with new technology and trade. Its psychological commitment to place is tested every time there is an impact fee or regulatory nightmare. In our strategy sessions, option are being evaluated on how to follow the evolving market and respond to it. We are like a raft in the rapids, we are

pushed by reality. For the sake of all that we have, and all that we wish to become I hope you have the foresight to see reality as it is and find the courage and wisdom to find the right choice.

Mike Spence, SKC Association Realtors, the Apartment Association of SKC and the WA State Commercial Association of Realtors.

This is the group of people who are going to have to sell the results of these policies to the public. I'd like to make a couple of comments about the actual SEIS itself. First, I think it is absolutely ludicrous to assume 100% zone yield. And that is what this document does. What you are assuming in this analysis is that every underutilized parcel in this county will be fully developed in 20 years and I think that is an erroneous assumption. As an example, this building right here, the KC Courthouse is zoned DOC2240 which is a height limit of 240 feet. According to your facilities department, this building is only 150 feet tall on the 3rd Avenue side. That means in order for these policies to work, you would have to add 90 feet to this building in order to be intellectually honest about this analysis. Second point, is that the policies that this SEIS is based on use old capacity numbers. Those numbers were drafted by the data resource technical forum and they were submitted to the GMPC prior to July 1992. Since then this group has recommended adjustments 15% for market factor, 5-15% for vacant land factor, 15-25% factor for redevelopment. That is operated to reduce the stated capacity substantially. For example, in Seattle the differences between 139,000 units and 95,000 units. That's 43,856 units of unaccounted for housing needs that are not analyzed in this documents. In addition to that, the data resources technical forum, a group of which I spent a considerable amount working with, recommended a concept called a six year rolling land supply. That is not mentioned in this DSEIS and that is something that should be mentioned. Third point is that the capacity study is far from complete. On page 18 of the document, it says that the effects of concurrency have not been taken into account. That is a major factor and without that information, I submit you cannot truly count land capacity. In fact, the first point on page 14 calls for vigorous monitoring and capacity. Which to me, evidences a lack of confidence in the capacity numbers on the part of the drafters of this document. Fourth point, something that I find kind of surprising, this documents assumes that higher density zoning is less costly. Both on pages 66 and 71, in the real estate marketplace, if a property is upzoned or if it is multi family zoning that property costs more and its more difficult to put an affordable product on the market. I think those assertions are dead wrong. Fifth point, housing mix issues are not addressed at all and it's crucial. According to this document, 61% of the new development in the next 20 years will be multi family. According to a study done recently by the City of Seattle, 63% of the public demands single family homes no matter what happens with open space, greenery, trees, amenities, schools or crime, etc, within the urban centers. That is a substantial deviation from what this document assumes. A study recently completed by Fannie Mae mentions that 80% of the public wants a single

family house with a yard so I suggest that housing mix issues need to be included in a true supplemental environmental analysis. Another point is that the consequences of the market not accepting the housing choices that these policies contemplate has not been addressed. On pace, nor has the concept that these policies might price the average consumer out of the market. That needs to be looked at. That was something that was raised in the scoping hearing and has not been addressed in this document. Lastly, a point that I find absolutely incredible, on page 24, its found that there will be an enhanced sense of shared public purpose and commitment to neighborhood values through closer community ties. This follows from higher density. In other words, this document asserts that higher density means less crime. I don't believe that. Thank you.

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PANEL #5 - ENVIRONMENTAL COMMUNITY

Steve Halstrom, 5405 Tolt River Road, Carnation, WA 98014

Chair Vance, Councilmembers, thank you for the opportunity to comment on the draft SEIS for the CPPs, in particular on the Land Use analysis.

At the broadest level the analysis covers the options and the impacts of the policies adequately given that this is a phased review of a non-project action. The data which is used to represent the rural area reflects much more closely what is happening on the ground than what has previously been produced by county reports. An encouraging signal to those who recognize that the rural land is being developed at much higher densities than the ballyhooed 5 out of 10 acre densities of the 1985 Comprehensive Plan.

I believe that the data clearly supports the center alternatives as the least environmentally degrading, the best for meeting affordable housing and the most likely to provide for economic development when all costs are considered. All costs include the cost of loss of land and degradation of the environment, factors which most likely will not, but should be, included in the fiscal analysis. It is past time that economists recognize that resource lands and the environment have value not measured in the marketplace, especially given the premise of sustainable development.

While the data support the center alternatives, the narrative is less precise. Reading only the analysis and not including the mitigation measures the narrative is highly biased toward the magnet alternative. Clearly the authors want to include benchmark and incentives as essential to the implementation of the GMA. As written and described the magnet alternative fails a test of reasonableness. Goals will be set and incentives used. Rules will be promulgated as the development occurs.

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Imagine applying this to a team of teenagers on a playing field. The goal is to get the ball to some place on the field. The incentive, a new car. The benchmark: no injuries and do it in 30 minutes. 10 minutes later monitoring shows two broken legs. A new rule, no clipping below the belt. 5 minutes later, three bloody noses. Monitoring produces a new rule, no hitting above the neck. And who is making the rules. Each jurisdiction initially makes their own driven only by the incentives. And there is yet another new appointed body to referee.

The Magnet Alternative is the Graham/Rudmann alternative. Like Graham/Rudmann Deficit Reduction it sets lofty goals but no one is held accountable for achieving them. And it should be pointed out that Graham/Rudmann included monitoring and benchmark. Without enforcement policies the debt only increased, as will environmental impacts with the Magnet alternative.

In the Mitigation section the DSEIS acknowledges this shortcoming and suggests that the "good policies" of the CPPs be implemented to give the magnet alternative substance. I have long advocated incentives to supplement and where feasible replace regulation. If our culture had strong communities, matching the strong ethos of the market economy, this option would be more feasible. The centers alternatives provide a basis for building those communities.

The market ethos shows in the "least cost" modeling. Does least cost consider the social and human costs of the disenfranchised, the homeless, the high crime rate and deaths in the impoverished neighborhoods of the county? Does it include the \$25,000 annual cost to house criminals? Does it even consider the \$5,000 annual cost of owning a car that the auto-friendly areas require. Well designed urban centers with employment will help mend our deteriorating social fabric.

The narrative discusses impacts. The centers impacts are characterized as adverse, whole other alternatives are more often just noted as changes. There is no justification given for this language. If in building centers, open space, parks, community and civic centers, the arts, and other urban esthetics are primary, where is the justification for calling them adverse? Building such communities should have a positive impact on the human environment and hence the natural environment. Imagine what renovating Bellevue's CDB could mean. All the traffic congestion gone, no more than 3 minute stop lights. The new park accessible and used. Try Bellevue on foot, transit or bike today. Not many do because it isn't a functional community.

At the same time narrative word smithing is used to downplay the impacts of autos. The alternatives that depend most on the expansion of roads are described as increasing the auto-friendly area. Autos are our major polluters and they result in more impervious surface than any other form of

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transportation. Consider this from an ecological perspective. Instead of auto-friendly, the ecological term for these areas is environmentally damaged. Go back and re-read the sections substituting "environmentally damaged" and see what sense it connotes.

The analysis assumes all centers will have the same characteristics. One mitigation that should be considered is defining different levels of urban centers. This was proposed in the Vision 2020 model and recognizes that downtown Kent might never be like downtown Bellevue. Choice is one of the drivers of the market and choice in urban centers should be provided as long as the density suffices for transit and pedestrian occupancy and work places.

Use of current zoning biases the analysis toward the auto-friendly alternatives. While this technique provides a base level for comparison it does not recognize that inherent in any centers alternative is rezoning of the CBD. Once that assumption is applied then the centers alternatives are clearly best.

Incentives, monitoring and benchmark all can be used as tools in achieving the goals of GMA. Benchmark need to be independent of the planning process least they be like achievement test scores - the results tainted by process. In achievements tests there is teaching to the test, in benchmark setting goals with predetermined conditions. The latter allows the claim that the 1985 Comprehensive Plan met its goal of keeping development in the urban area. To report that 95% of growth was urban is not representative as the urban area included the sprawl that ultimately culminated in the GMA.

The policies of all three task forces strengthen the CPPs environmental protection. Except for the business/office park proposal in the Economic Development policies their inclusion in an amended 14 center alternative will provide the citizens of the county the most environmentally, socially and economically strong framework for the future.

Kathy Fletcher, Executive Director of People for Puget Sound

People for Puget Sound is a citizens organization with 15,000 members in the region. Our mission is to educate and involve people in the protection of Puget Sound. My comments will focus on water quality and related issues. I think overall the EIS does what it is suppose to do and that it lays out a range of alternatives and provides a good basis for comparison among them. I think it is obvious that a policy framework is essential to move ahead with this critical issues of growth management and I would urge you to keep the process moving. We hear a lot of criticism of government today for cumbersome and time consuming processes and costly analysis and planning exercises without decisive action. I think we're long past the time where some decisive action in growth management is needed in our region. The purpose of this review is in fact to help improve this EIS and I think,

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obviously improvements are possible and needed. Among them I think some consideration of hybrid alternatives and refined alternatives would strengthen this document. Just as one indication of the quality of life and the quality of the environment in our region is the condition of our fisheries. Certainly an important issue to people in this region and an indication of the health of Puget Sound. Our fish harvest in Puget Sound are at its lowest level in 50 years. Salmon runs are going extinct and others species of fish are in steep decline. Because of a sum total of a lot of effects of growth in our region. I think while looking strictly at the non-human environment one might argue that its the growth itself that we must somehow stop. Obviously that is not our choice and we must learn how to manage the growth. Among the impacts of growth transportation in fact turns out to be one of the most significant impacts on Puget Sound. Stormwater management and use of the automobile are one of our most serious challenges in protecting the sound. Interestingly, when we have density, not only are we able to support mass transit more economically, we are also able to support stormwater management more economically, we're also able to handle sewer management much more cost effectively when we have density. While density may in fact sound like more environmental impact when you step back and look at it, it actually provides the basis for managing our environmental impacts much more effectively. Automobile use, indeed I rank as the number one threat to Puget Sound. And as we look at the last 10 years, while our population in the Puget Sound region has grown something over 20%, the auto miles traveled has grown at about 4 times that rate. I think we need to focus very strongly on transportation and that argues very strongly for alternatives that help us achieve centers of density in that region. In addition open space and shoreline protection and protection of sensitive areas are key aspects of protecting Puget Sound and as you go down each of these key issues with respect to Puget Sound that we simply must learn how to achieve and move to achieve density. A number of comments about the urban centers has suggested that they look a little bit too much like cookie cutters and that's the direction of refinement alternatives is to look at maybe something that would offer more variation but within that same concept of urban centers. Also the underlying principal behind the magnet could also be combined with the idea of centers because incentives would clearly make achieving urban centers more profitable and more palatable. Thank you very much.

Larry Smith, Land Use Attorney with Graham and Dunn.

I primarily represent development interest but with a strange quirk of fate I represent the Sierra Club on urban issues and I'm one of the lawyers here who is not being paid. I am also chair of the Land Use Committee for the American Bar Association's section on urban, state and local government and a member of the Fis/Ed Task Force. The environmental community is pro planning and not just for preservation for outlying areas and preservation of our natural environment but because there is a recognition in that community that most of us live in urban areas. Most of us spend our life in

urban areas. Therefore the quality of those areas is a part of the environment with which we should be significantly concerned. Let me tell you something about the scope of the EIS. Naturally in this type of forum you are going to hear a lot about what the EIS fails to do. The answers that it fails to provide. But recognize, as has been stated, this is not a project EIS. What we really ought to be hoping for out of this document is not necessarily all the answers but hopefully all of the questions. Those are questions that simply won't be answered before we begin. They will be answered as we go and as we implement these things. Yes, we must continue to gather data. There will come a time when you will have to set a direction and you will have to set that direction without all the answers, without all the accurate projections of where we will be 20 years from now. That's the nature of looking at a 20 year plan and that is a decision you will have to step forward and make. But recognize that we are looking a long term vision here, not just a 20 year planning cycle. Ultimately you have to ask yourself what will this region look like a hundred years from now. Clearly we have a limited supply of land and we have to devise some sort of policy to grow. Presumably there will be a Puget Sound region 100 years from now and it will not be something that just continues to sprawl to the crest of the Cascades. So what we are doing now is setting a framework. The center's policy sets that framework. True, we may not see the 8th center or the 5th center or the 13th center achieve a particular forecast by the end of the 20 year planning period. I assert that that is not the critical point. The critical point is that we set the framework so that that type of regional development can take place in our future. If it doesn't happen in 20 years, so what. The answer to so what, is that that will cause some ramifications in this plan. The Fis/Ed Committee has advised, or will advise that we must be prepared for various projections not to come about. That is true in any planning exercise. We may have a greater influx of people into the central areas than we predict, we may have a lesser one, we may hit it just right. It just depends on what we do in the next 20 years and what the market does and what the economy does. It will depend upon things that you simply cannot forecast as you sit here today. Nevertheless you must act to set a framework for where we're going with our future. This is not new uncharted territory. The notion of regional planning within the professional planning community and the legal profession is widely recognized as the mark of enlightened approaches to the future. Regional planning does exist elsewhere as do urban center concepts. People do live quite willingly in multi family situations, in zero lot line situations and in urban villages. Prior to the post war invention of the subdivision everybody who lived in urban areas lived in an urban village, lived in a neighborhood where they knew one another, where they walked, where there was safety on the street by virtue of the fact that people lived in those communities. We've gotten away from that. For that reason and other reasons, we've seen our urban areas deteriorate. We've seen them turn dark at 6:00 when everybody goes out in the suburbs. Many people think reversing that trend is critical, not only to growth management, but to safety, to reinvigorating our cities, our schools and providing the incentive to have services in our

urban neighborhoods that create safe and attractive places to live again. Once those places become attractive people will live there, people will want to live there. Not everybody. It's not anyone's notion that everyone should live in a high rise or live in a multi family situation. For many folks that doesn't work. For many folks it does work. I live in a high rise. I hereby testify, it's a great lifestyle for certain situations. We will not know how attractive it can be until we look back 20 years from now and see what we have accomplished. Two more comments and then I'll quit. One, the Fis/ED Task Force has been working, as you know, for the better part of a year. It's a group that started out with a wide variety of different points of view over the course of the last year. Although we disagree on a lot of details, certain consensus has emerged around some of the basic principles that are embodied in the center base strategies. Mainly providing pedestrian, friendly urban environments served by transit as an alternative to large lot subdivisions. Not as a replacement but as an alternative, as with other housing options. Second, a trade off of higher densities in some areas in order to maintain lower density elsewhere. If we are going to have some single family neighborhoods rather than wide spread mix of hybrid neighborhoods then we have to densify in some places. The center concept provides a way to do that. Realistic and affordable options to single occupancy vehicle travel. Again, not replacing the private auto but providing some realistic options. In order to do that you have to have people living at least in some parts of your cities, in denser conditions. Finally, we must have encouragements and incentives to manufacturing, commerce and development rather than discouragement and disincentives. That has to be part of any plan that we put forward. One comment about the magnet alternative. First the good part, the benchmarks. I serve on the Benchmark Committee for the Fis/Ed Task Force. We've developed Benchmarks, not with the idea of just the magnet alternative but with the idea that anything you do in a way of putting forth a plan you should have a way to measure it. So I don't see that as any part of one alternative or another. The magnet alternative, essentially, from my point of view, offer two things. One, it offers a way to allow the neighborhoods to have greater control in the plan at the expense of the broader vision; and two, it encourages incentives which certainly ought to be there no matter what plan you choose. But it discourages regulations, so, if a developer wants to go elsewhere and you cannot incent him or her to go into a center concept or into a non center urban area that supports the plan then that developer will be able to do so. That is why there is support from that community and I think it is contrary to what needs to be accomplished and it will undermine the long term future. Thank you.

Everett Wilcox

I'm on the steering committee of Windpac, the WA Environmental Political Action Committee. I'm also a member of the Sierra Club. I am an industrial chemist, as a profession. I think it's interesting, the difference between chemists and engineers. Engineers take general assumptions and then they figure them out to six decimal points and come up with things like this chart that says there will be 22 residential buildings in Bellevue. Of course we guessed the density of the employment. We guessed the density of the residential but we come up with an absolute value. A chemist tends to look at things and say we don't know exactly but lets try experiments to give us an indication and then we make assumptions to the future. My business is profitable. And one reason is because engineers design water treatment plants and us chemists go make them work. That's a prejudicial statement. George Bernard Shaw quoted by Robert Kennedy had a quote which was used frequently that some people see things as they are and others see things as they should be and ask why not. I think that in this case, you as a Council are being asked to be in that second group. We have a lot of facts about the past and we know how things have gone in the last 20 years. We don't have so many facts about the future. We know that our population is aging and changing. And that 25% of our people now live in traditional families. We have a lot of untraditional families. That's husband, wife and children. We have a lot of single parents. I was a single parent for six years and raised two children. That is not typical to have a male with two children in a family. We have a lot of other families. So our needs for families are changing and as we plan and go into this, we have to deal with that. I think the SEIS has done an excellent job of taking and gathering facts and then putting them forward. I think it has been very leery about making assumptions from this. We've taken the magnet theory, our proposal, and we know that in the past 20% growth in population has led to an 80% growth in auto traffic. We are very slow and leery to say that if we go with the magnet proposal that we are going to have a disproportionate number of auto trips for the number of residents. What we are asked to do here is to look at how we can protect the air, how we can protect water, how we can deal with our transportation systems and still afford it. That is the major question that we are asking here. That if we do not do this then this area will not be as attractive to people. Our economy will stall and we will lose our impact. The SEIS is doing a very good job of looking at the basic facts. You as a council have the job to decide how we are going to implement this and I would encourage you very strongly to remember that the reason we live here is because it is a good place to live. The reason that Boeing is here and these companies telecommute from here is because of the quality of life. If we destroy that by allowing sprawl to continue and by allowing degradation of our environment then we have destroyed what is valuable for this. When I was in college, I lived in Boston, a very high density city. I didn't even own a car. I'm a gardener and I've had a garden every year since I was five. I had a garden when I was in Boston because it was a community pea patch and I could do my thing in a community pea patch. I

lived on the 7th story of an apartment building and I had my garden and I had a very, very good quality of life because of those amenities. This was back in the 60's. What we need to do is take some of the incentives of the magnet theory and make sure that these centers are good quality places to live, good quality places to raise families. To reconstitute a community, Scully Square in Boston was renovated when I was there. It had been a great place to live but it was falling apart so they took it out and they built a new, sterile government center in its place. The crime rate tripled when they took out that because they destroyed the family structure and the human community. What we need to do is build systems where the human community can prosper and we can live and go into the 21st Century with the quality of life that we have enjoyed in the past.

VANCE: I'm going to go out of order. Mayor Rowan Hinds from Issaquah is here and has to leave. He was one of the folks signed up to testify later. If the mayor will come forward, following the mayor, we have two more panels and about 25 more folks to testify. I wanted to accommodate the mayor's schedule, he has another meeting to attend.

Mayor Rowan Hinds, City of Issaquah

As the mayor of a suburban city, I would like to take this opportunity to share some of my thoughts on how this DSEIS fits into the decision making process for which it was prepared. I think this is a very lengthy and complex document which the city has not had a chance to do a very comprehensive study on it. But there are several aspects which are important at this point and need to be clarified. DSEIS is intended to be a decision making tool for citizens and jurisdictions to help them understand the impacts of the Countywide Planning Policies and to help them in making tough decisions regarding our future. One of the key elements of the CPP is the aspect of the urban centers. There has obviously been a lot of discussion on this today. I think this document needs to provide analysis of the impacts of this strategy. I feel at this point that the SEIS is ambiguous and does not address some of the critical issues such as, how will the urban center strategy work? Will it provide the needed housing and business opportunities that it is suppose to? What will be the infrastructure costs? Who will pay the bill for this infrastructure? What will be the fiscal and economic impact on areas outside the centers? Given the limited public resources and the priority needs for these centers, how will we pay for infrastructure that is badly needed now in areas such as Issaquah and the East Sammamish plateau? And how will the projected growth impact suburban cities such as Issaquah? In addition to not answering these concerns the SEIS refers to some errors in data and uncertainties in planning assumptions which I feel make it very difficult to provide an accurate analysis of the impacts. I ask that you ensure the accuracy of the information in the Countywide Planning Policies and also make sure that the impacts of these policies are adequately and accurately identified. The cities

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are relying on the Countywide Plan Policies for our planning and it is imperative that we have an accurate and adequate SEIS. Thank you.

PANEL #6 - COMMERCIAL AND BUILDING LEASING

Russ Segner

I am an industrial commercial real estate broker. I also serve on the Fis/Ed Task Force to GMPC. My colleague here is Gary Dankelson, with Cushman and Wakefield. We are also here in the capacity as elected officers of the WA State Commercial Association of Realtors, newly founded by the statewide Overlay Board focusing on commercial industrial issues. I would have had my testimony prepared in writing and I had planned to do this yesterday afternoon but as you may have guessed events intervened. I had a client come in from out of the state who was not due until later in the week looking for a site. I think that what I didn't get a chance to write might be illustrated by the circumstances of this company. A major manufacturer, national in character, they have to do with supplying the home building industry with a product that is key to their business. They are looking for a 10-15 acre site. The site has to be zoned. It has to have very good soils because the equipment in manufacturing is very heavy. It has to have all the utilities in place and must be ready to go having only to deal with the permitting process which they envision to be somewhere between 9 and 11 weeks. They would also like to keep the price somewhere under \$120 an acre. Their parameters were 1 hours drive from the Tacoma type flats. We were able to show them three sites in King and Pierce Counties. I think that's illustrative of some of the points I would like to make in terms of dealing with the EIS we have in front of us. A great deal has been said about capacity and Mayor Hinds just alluded to some of the questions that are raised in the EIS, properly so. I think there is a great lack of really precise information that is absolutely necessary to this process if the process is indeed going to be successful. Because if we are not on track in terms of real numbers we will have encouraged companies, such as the one I just mentioned, to locate in Chehalis or Kelso. In my definition of the term, that is sprawl because many of their customers are here in the Tacoma Seattle market. It is stated in the data that's used to underpin some of the discussion about industrial siting that there is approximately 9200 acres of land available in the jurisdictions in King County. My experience as a broker would indicate that most of that resides in the Kent Valley or at least south of the Kingdome. I want to put that in context so that you might get a little bit understanding of what that really means. According to one of my competitors with CD Commercial, a very respected firm in the region, their calculation is similar to mine. My estimate is about 1,200 acres in the Kent Valley. So right off the bat we are dealing with a magnitude of may 6, 7 to 1 there's a point of error in evaluating what is really on the ground. I sat in one of the technical forums that dealt with capacity very early in the year and we had a very good dialogue there but frankly one of the parts of the process that is not working very well is that

there is not good data. It's my job and Gary Dankelson's job and Gary Volcheck, CD Commercial, Gary Burlington, Cd and Wakefield's job to find sites for customers. If they are out there, we should know about them. If we don't know about them, then we are not doing our job, we are not serving our client base very well. We're basically here to say categorically that the land does not exist. That people imagine it to exist. One of the things that really struck me as we got into process early on in Fis/Ed was that the assertion was made that these jobs could be clustered into the urban centers. I know for a fact that you can't build a Kenworth truck in a 2-3 story building. That is true for the predominant portion of the industrial base. And by industrial I am talking about the people who weld, and bang and drill holes in things and so on. Industrial also includes a whole host of other people. There are people who service vehicles. There are people who supply paper products, rubber bands and pencils to all the businesses in this region. Those people are typically housed in single story buildings with easy access for loading in and out trips that they must make to their customers. If you think about it the last 20 years has really been a market experience where the market has been saying, and driving the nature of the buildings that have been built and they are typically business and office parks. Again what struck me as I first got into the process was the outright prohibition of expansion of business and office parks in King County. We have come full circle on that in Fis/ED and I am pleased to say that the EIS does speak to that and basically endorses that as an outcome because it truly does reflect what is required by the businesses in the region. Certainly the biomedical and the high tech (unclear language) industries software and so on can occupy 3 and 4 story buildings and they do so but they do so at a great deal of cost. For instance, take the Fred Hutch assemblage of land around Lake Union at \$58 per square foot is not competitive with the Kent Valley. On the other hand we may indeed get a much more dense employment base there but it is certainly not going to be what we expect because if you walk through that facility you will find a great deal of it is unoccupied. It is infrastructure that needs to be in the building. Laboratories and meeting rooms and so on that are periodically used so the number of people per square foot or per square acre in some of these high tech areas is not what we imagined it to be. One of the things that also struck me was a reliance in theory on the redevelopment of older urban industrial areas. Approximately half of the capacity imagined under the EIS or at least under the GMA plan was spoken to in the EIS comes from redevelopment. I assume that most of that comes from Seattle. When I evaluated the Seattle industrial study consummated some months ago, it struck me as a little odd that 313 acres was identified as being available and vacant right now with another 110 acres available and potentially redevelopable, that's what the language says. Some of you in this room took an industrial tour that the industrial brokers of King County organized. We drove for 3 1/2 hours, you were very patient and we appreciate that. Through all the industrial zoned areas of Seattle and the specific point of that was for us to get an understanding of what was really on that vacant land. What I saw on the vacant land was containers, buses or chassis or other apparatus under

manufacturing ready for shipping were boats parked up on barrels. All manners of things that had to do with industrial process and business activities, the land was indeed not built upon but is absolutely in use with very few exceptions. That 313 acres identified strictly by looking at the assessed value ratios of building to land is in production and it is used. If you deny its use by putting a building on it that stuff has got to go somewhere else. The land is occupied for instance by containers that are stacked 6-8 high on private sector property would have to be acquired and developed by the Port of Seattle if those types of activities were to remain in place. So the numbers just don't match up. In summary, I basically say this, the types of businesses that are attracted to this region will not change. Correct public policy will address the interest and needs of most people who come to sustain the economy of this region, who need to expand out of older buildings that are not effective anymore. Who need to develop new processes and acquire new equipment which requires different shapes and sizes of space. Who are handling containers that used to be 30 feet long but are now 48 feet in length and so on and so forth. If our policies are so restrictive as to deny them opportunity to expand here in King County they will by necessity move to Pierce, Snohomish, Kitsap, Mason and Lewis Counties as indeed they are. Right here, this morning, my colleague, Dave Douglas in Tacoma is taking his client to one of the three sites that we identified. One is in Frederickson, it's ready to go, it's under the \$120,000 threshold and that's likely where they'll go. The dominant part of their clientele, that is the product that they will deal with in this facility, will go to factories and other businesses in the Seattle market including several in Woodinville and Snohomish counties. I'm just saying to you because the land is not available here, those trucks drive through this urban center. I think I'll conclude with my remarks right there. I have asked Gary to kind of deal with the issue of contaminated sites and some of those he is quite familiar with, the Duwamish Basin and some of the issues there.

Gary Dankelson

I too, am on a site search for a company that is looking for recreational property to be zoned commercial or industrial zoning. It needs to have high traffic count and we're trying to locate properties in the five county region. In King County, we are having a very difficult time trying to find 50 acre sites that are properly zoned and with the proper access that my client needs. The other issue I want to talk about is regulatory reform regarding environmental issues and the uncertainty it causes for the buyer and seller in the real estate transaction is enormous. We are involved in several transactions. One where it is a \$25 million transaction. The clean up costs are \$10 million that was estimated by the buyer. The situation arose where we wanted to hold back \$10 million of the \$25 million for cleanup purposes. The transaction was a very important process for my client. It had to be accomplished, they had a very tight time schedule and we had to go out and get another review of the property from a different consultant and found out that the worse case was \$10 million and it would probably range

LA-1(b)

somewhere between a million and 10 and it took a lot of time to get the parties to resolve that outstanding issue. We were able to do that but we need regulatory reform where the process is clean, precise. We need it where businesses can make decisions and they know what process they will have to go through where they don't have to hire four or five different consultants with different reviews and run up the cost of the purchase. I would like to just say that also in regard to wetlands we need a clear and precise policy on wetlands. We have got a situation where we bought a piece of land several years ago, it was earmarked where the wetlands were and the expansion could take place. What happened was the company didn't monitor the wetlands and the wetlands grew, not because of their own faults but because other development in the nearby area caused some more seepage onto their property and all of a sudden what they thought they had as usable turned out that they might not have usable land because of the five year jurisdiction of the Army Corps of Engineers. The SEIS does focus on the issues of regulatory reform as one of the way to create capacity. It does mention that in Seattle these are not constraints that are placed on the capacity numbers used, they are however there and certainly one sight that we are dealing with in Ballard there is a wetland issue, I think eliminates about 20-25% of the site's utility. That part of the site that is denied as capacity really is taking away from the generations in the future. And I think the burden should really shift not from the users or owners of property that there is a public benefit by denying really the burden should be on the regulatory people.

PANEL #7 - FIS/ED TASK FORCE

Taylor Washburne, 1111 Third Avenue

I am Chair of the Seattle Chambers' Growth Management Task Force, a member of Fis/Ed and also chair of the Seattle-King County Economic Development Council's Public Policy Committee.

I spoke to you about 10 days ago on economic development and the GMA's process. Today, you're focusing on the Countywide Policies and the SEIS and to answer Councilmember Laing's question, I see what we are doing here, not commenting on the EIS but to see what role it plays in your long term decision on what policy to set. Larry Smith talked about the long term vision and that is clearly important but we have to remember that this plan as represented in the policy unlike all previous plans is a binding law. What does that mean? It means we have to balance our 50 year vision with the reality of the impacts in each of these areas as all of the previous speakers have. The allocation issue is really a key both to the SEIS and to the local plans that are going to be coming before you. The current allocation to a certain extent is just an attempt to make the numbers add up. I would submit that that doesn't make sense for a vision or for our impacts because what we are talking about is your control of limited regional resources and how best to organize and prioritize. Secondly, we are talking about a

collective effort to set an economic strategy for the region that makes sense for the region and for each of its parts. An illustration from the SEIS mentioned by previous speakers is Seattle's ambitious projections for residents and jobs. If we take the number of industrial areas, for example, the allocation of those jobs to Seattle doesn't take into consideration the cost of environmental cleanup in addition to the time and the extent to which businesses are willing to pay for the redevelopment costs of siting in Seattle. That is why there are so few sites that the gentlemen before us referred to in the city of Seattle. Seattle suggests that multi story industrial buildings are one way to get around that. The evidence isn't there. To a certain extent we have to try and see whether or not there is a reasonable basis to the vision. What is the significant of that? If you and your allocation agree to that, for example, then what you will do by inference is take away other siting opportunities which may be much more feasible for the businesses we want to keep here and those we want to attract. The role of this SEIS is to help you in this process. How well does it measure up? Larry says its supposed to ask the right questions. I would submit that it doesn't ask the right questions because by its own admission it doesn't purport to figure out how much is it going to cost? I.e., fiscal impact and will it work? Are the alternatives feasible? The previous speakers have addressed both of those, I would suggest that summing it up, the alternative's analysis doesn't try to answer the question of whether or not it works and so you cannot place, as policy makers, a great deal of weight on either the 8, 14, magnet or any of the alternative conclusions in the document. One of the questions the document does not answer is if the alternatives analyzed don't achieve their goals what are the consequences on the county in terms of if you adopt the policy premised on centers and send your infrastructure and transportation strategies that way, if the goals of those investments are not realized what is the impact to the county and those jurisdictions where the people and jobs are likely to go. The Fis/ED Committee did some case studies, you will hear about that later but basically they were on the ground analysis of the policies that are being presented and what their impacts will be. The two conclusions we all agreed on is the residential goals are very unlikely to be achieved without major incentives and investments from government and to a lesser extent the same comment on jobs. My conclusions based on these comments and developments. First, move forward with your Phase II timetable on schedule both for the sake of your county plan and for each of those cities who are marching along based on the Phase I earlier assumptions. Second, given the credible doubts on the basic assumptions underlying the 8 and 14 center alternative and given the lack of detail on the magnet please do not adopt a county plan or Phase II until you have a better assessment as to the assumptions in questioned and until you understand their relationship to the economic strategy we are doing collectively and until you have integrated the county Phase II process with your county plan. Finally, I ask you to use this window of opportunity, the growth management window, starting with the policies and your plan, to promote and work into law the regional economic strategy that we are now on the track. We're at phase 2 of 4 phases so

that by so doing we can ensure that in addition to the environmental goals that have been articulated earlier that we all have a firm economic base, good job, good home on which to build our future.

Wally Toner, 3012 Furnham Avenue East

I am on the Fis/Ed Committee. I am also on the State Regulatory Reform Task Force and have been the chair of the Growth Management Task Force of the Seattle-King County Economic Development Council. The characterization of the alternatives need some comments. The idea that somehow centers developments was invented as part of the growth management process is not correct. The 1964 Comprehensive Plan of King County was the document, the policy document where the region stepped away from a hub city development pattern. Seattle being the center of that hub and admitted that we were going to eventually develop into a multi-center concept. So 1964 was the beginning of our regional development as a multi-center community. 1985 Comprehensive Plan of King County confirmed that and to dismiss the 1985 Comprehensive Plan updated (TAPE NEEDED TO BE TURNED OVER -- SPEAKER KEPT TALKING) King County Comprehensive Plan and the 14 center plan as two brackets to look at what the range of choice might be and I think it's instructive that in that comparison that the CPPs were enacted according to the 1985 Comprehensive Plan the same number of housing units and jobs would take up 40,000 vacant acres under the 1985 plan. In the 14 center plan it would take 11,000 vacant acres for the residential component. The commercial and industrial component would take 10,000 under the 1985 plan. Under the 14 center plan we would consume 3,700 vacant acres. Under the assumption that we are not changing the kind of employment that we are going to use over the next 20 years it is somewhat surprising that we are going to accommodate that future employment in a substantially reduced number of use and vacant acres. What this means is that under the 85 Plan as the author states, that redevelopment use of already existing land would be about 10-30% of the future growth would be in already existing redevelopment. Under the 14 center plan, 35-65% will be in redevelopment. The consequence of that choice is a major, major policy decision because you will be expecting new residences and new employers to exist in 3 or 4 times the incidents in a redevelopment situation than they have in the past. Whether that is reasonable or not is a judgement call and the Fis/Ed Committee is going to try to produce information that will help you peg where in the scale of redevelopment and density you think it is practical for us to aim as a goal. In the density comparison, the residential component is 2.5 units per gross acre under the 1985 Plan. The 14 center plan would be 5 units per acre, exactly twice. All new development would be in at least twice as dense a pattern for residential development as we now experience it. We would suspect that instead of 50% being multi-family we would move up to 65% of future development being in multi-family. I think other speakers have emphasized the fact that the only way to properly decide where in this span is it practical for us to set as a goal is to

use real market information. Before this document is finalized the incorporation of practical real market information to peg where the practical distance is moving from the 1985 Plan, which by the way in the 1990 update, was a claim to be a fine document. Somewhere after 1991 it became not such a fine document and I would encourage you to revisit the fact that the 1985 comprehensive plan is in fact a centers plan. The second point that I want to make is that there is an assumption in this document that having 25% more land available than we are going to consume whatever you decide is the assumption target, having a 25% cushion for market reality. There is no documentation of any other community in the nation successfully doing that. So in the past we have had as much as 2-3 times this cushion, now we are talking about a scant 25%. The impact of that on market forces needs to be clearly understood before you adopt this. The third thing I want to say, is that it is often said, that it is just much cheaper to develop in an infill strategy and therefore in a center strategy a redevelopment strategy than it is to develop vacant land. I would like to call your attention to page 24 where the SEIS says that research literature leads to no firm conclusion on this complex issue. So for those who make the automatic statement that it is cheaper to develop in a redevelopment mode over development in vacant lands this document finds there is no evidence that there is a conclusion that it is cheaper to develop in a redevelopment sense than to develop vacant land. Thank you.

Holly Kean

I am the Executive Director of East King County Water Association which is a group of 16 water purveyors east of Lake Washington. My comments center on the Chapter 8 Water Supply Chapter because you can have all the land you want but if you don't have water it's not going to help us out.

This chapter needs to state more forthrightly that new water sources will be needed to support economic development strategies and continued population increases from internal growth and in-mitigation no matter how successful we are at conserving water as the next source of new supply. Although sound policy, conservation is a stop-gap measure to give us the time -- 15 to 20 years -- to find, plan, allocate, and build a new source. No matter how the population is arranged on the King County landscape, a new major water source is needed. We are not deferring a decision to build new sources by the use of conservation. We are doing all things possible to stretch our current supply so King County residents can continue to maintain their current lifestyle with a minimum of sacrifice.

King County has long had a policy which discourages the extension of major utility infrastructure into rural areas unless a water quality or supply problem is identified. This is buttressed by code language which puts teeth in the policy. To my knowledge, there are few, if any, problems implementing the policy. So, I am puzzled by several references to the possible need for major improvements to the rural utility system infrastructure. King County policy

translates to individual homes on a well or lots created by shortplat or small subdivisions being served by a well(s). If major infrastructure improvements are needed in rural towns or cities, the SEIS should be more precise.

Class A water systems contain 15 or more connections; Class B systems contain 2 to 14 connections.

The references to the 1985 Seattle Water Supply Plan on page 126 are out of date. The situation is now quite different. The discussion should be based on the 1993 Seattle Water Supply Plan.

In addition to conservation, individual utility exploration, and the potential of the North Fork of the Tolt River, the Seattle Water Department and the East King County Regional Water Association are exploring the possibility of locating a major regional groundwater source in the Upper Snoqualmie Valley. Application has already been made to the Department of Ecology to drill an exploratory well.

The proposed intertie between Tacoma Water and the Seattle Water system from Pipeline 5 should be discussed as another source of water. The quantity, however, will not be known until Tacoma completes its negotiations with the Muckleshoot Tribe. And, if construction is not begun on Pipeline 5 by 1996, it will put additional stress on the Seattle Water Department system as many of the South King County purveyors rely solely on groundwater. Cities such as Federal Way do not have a surplus water supply unless Pipeline 5 is built.

I agree that construction of more multi-family development will reduce water supply needs. However, the reduction should be quantified because I'm not certain it will be significant.

The concentration of growth will not necessarily have much impact on the need for new water sources. It will, however, have an effect on infrastructure needs. Infrastructure needs and source needs should be discussed separately.

The DSEIS should emphasize that a change to policy RU-16 is needed if we are to build new supplies. Public facilities for these new water sources will have to be constructed where the water source is located. The Cedar River system, constructed at the turn of the century, was built in the hinterlands because that was the location of the source. I do not know of any major regional sources which could be developed in the urban areas.

The reuse of treated wastewater should be included as a potential new source of supply. Although I do not believe it is a viable source because King County does not have many large, single users for the treated wastewater, it is part of the water supply scheme. Unlike Pierce County which has the Simpson Kraft Mill using at least 8 MGD, King County has

small users by comparison. The construction of a distribution system would be very costly because of the lack of concentration of large water users. Use of the system would be for only 2 to 3 months out of the year. It is also unknown if treated wastewater substituted for potable water to flush the Hiram Chittendam Locks can increase our water supply. The Department of Ecology may decide the saved water is needed to enhance the instream flow in the Cedar River.

15-16 There was no discussion of groundwater as an important source of water for King County. Groundwater supplies 22 percent of the urban population. This source needs to be protected from contamination and the reduction of the urban aquifer recharge areas by inappropriate placement of high density development. Thank you.

Basil Vyzis, 9322 NE Shoreland Drive

LA-6 I work in Bellevue. Over the last 10 years I have built in excess of 4 million square feet of office, retail, industrial and residential space including (unclear language) construction for (unclear language) downtown Seattle high rise. Therefore I have substantial experience in the matters that we are speaking of today. I have been a member of the Fis/ED group since its inception and I'm also a member of the subcommittee that is essentially studying the economic development portion of this EIS. I would like to tell you because there is a little amount of time that I consider this document to be flawed. I believe that what the chemist told you is totally wrong because Boston is right now dead and all the high tech jobs are in Seattle and the Bay Area not in Boston. And clearly, I am an engineer by training. Engineers actually make things work not chemists. Let me speak to you neither in engineering or chemical terms. The GMA in general violates the third laws of thermodynamics because it assumes, that's the major flaw, that if you force any development where you want it, it will go there. That's a major flaw. That was my reaction when I first read the document, I called the Executive, I said this is ridiculous so he stuck me on the Fis/Ed Committee. So the bottom line is we have been working for the last 18 months on the Fis/Ed Committee and this particular document has paid no attention to all of the discussion that has taken place for the last 18 months. I suggest that you need to set the document aside because it is very general and I suggest that you take the summary of the comments that have taken place in the last 18 months in the Fis/ED Committee and use that as a guiding light to go forward. Why do I say all of these things violate the third law of thermodynamics? It's very easy. First, it violates current nature. All you have to do is look at the past 20 years in this area, you tell me why there is something wrong. You can see the good things, you can see the bad things. I also recommend that you do not make a decision about which alternatives to pursue until you review all of the documentation that will come out of the Fis/ED group. I can sit here and essentially having built in both urban and suburban areas, I can come up with reason why each alternative is wrong. So what we are discussing now is the degree that you

EC-19 want to bend the lifestyle of the people. That's it. We have to do that but we should not do that the way Larry Smith representing the Sierra Club. Have you ever as a little kid jumped in the lake or the pool from high up? You plug your nose, you scream when you jump in. That's what they're saying. They are saying, we can't give you all the answers right now therefore, let us make this a legal document, let's go on and we'll turn the valves as we do it. That's not the proper thing to do. This document does not tell me what is wrong, what is going on right now. We need to identify and understand current reality and what our goals and objectives are. How are we going to do it so we maintain the economic viability of this area? That is paramount because (unclear language) to you being told by environmental groups, the greatest environmental degradation takes place in the economically disadvantaged areas. You have to have money to be able to take care of the environment. I say that without complaining the fact that maybe \$30-40 million worth of land that I have has been taken away. That's life. I have no complaints about the way King County has handled hundreds and thousands of square feet of construction I have worked on for the companies I have worked for. I have built buildings for high technology, (unclear language) probably the best software company coming out of the east side right now, Attachmate all these people I know what they want and it's void in this document. Totally void is the fact that nobody talks to the users, the people that essentially are going to use this facility.

Terry Seaman

IN-2 I am also a member of the Fis/Ed Task Force and I apparently have the tough job of following Basil. As many of the people on the Fis/Ed Task Force do I bring a number of points of view to this issue. I live on 16 acres out in Hobart and I like my privacy. I am also a member of the Maple Valley Area Council and I have to represent other points of view from the rural area. I have some correspondence from them with their comments. My wife and I operate a steel fabrication business in Seattle. In addition in the last year and a half on the Fis/ED Task Force I have become apparently an amateur planning expert, as all of us have. The general and most important comment regarding the DSEIS is that in the Fis/ED Task Force we started talking about a fatal flaw in the plan. Well, there's a fatal flaw in this document and that is that it proceeds from the assumption that all the planning alternatives can be achieved as envisioned by the planners. Starting from that assumption you are not going to get much valid information. The draft does not in any way test the feasibility of any of the planning alternatives by exploring whether or not and to what degree the various planning options are realistic expectations of what could happen in the next 20 years. It accepts rather than test those assumptions. Because of that I find the conclusions that are drawn, for the most part, simplistic, basically useless. Many people who have been involved in this planning process do seriously question these assumptions and they question them on a variety of issues and some of those include the population and employment densities in the urban centers. My question for the council is, is there any intention of providing a

mechanism to test the assumptions made by the planners before you proceed with the selection and the implementation of a third planning alternative. My conclusion is, as it now stands, the draft is of no use to you in selecting a preferred alternative.

Jolie Imperatori, 31222 - 139th Place SE, Issaquah

I too am on the Fis/ED Task Force. I'm speaking to the EIS that needs to more clearly represent the facts, as they are and will be. This document clearly is woefully inadequate. It is designed to support many erroneous assumptions and the policies of the GMPC that cannot and will not be achieved. One false assumption is that residents of the area want and will get out of their cars. The fact is that very few of us will get out of our cars, we always want other people to do that so we have a clear shot to where we want to go. It is true that there are new people moving into the area. 65% of these new people are your children and mine and that we are under the assumption that these people can, will and want to live in urban centers. I believe that this is another erroneous assumption. I have just sold three affordable homes in the last month to children of my friends. These affordable houses were between \$160,000 and 170,000. It took a combined income of \$60,000 with no debt to afford these homes. Two of them were in Lake Marcel area and the other one was in North Bend. These children were absolutely willing to drive to Kitsap, Snohomish or Pierce County to have a single family home. So, moving them into urban centers, in my experience, since I've been in the real estate business for 23 years. I have owned my own company with 15-25 agents. I have never moved anybody from the east side to Seattle to what we would call an urban center. This EIS poorly addresses capacity. All types of capacities and the zoning that will need to accommodate the jobs and housing in the next 20 years. This document supports a ton of social engineering that reads well but most folks won't accept and I'd like to remind the authors of the EIS, members of this committee and the whole council, that the quality of life begins with a job. The American dream is owning a home and people are part of the environment. Thank you.

Paul Barden

As I understand this process, the comments on the EIS to be used to influence the final EIS and to try and fix it where it needs to be fixed. The intended purpose of this SEIS is to analyze the probable effects of a reasonable range of alternatives for countywide planning policies. To do this, the SEIS should be based on data sets which reflect realistic growth patterns. Unfortunately realistic growth data was not used in this draft. the Fis/Ed Task Force work clearly identifies that 14 centers will not be built in 20 years, based upon case studies received by GMPC last month. It is doubtful that 8 centers will be built out in 20 years. The data set for the Magnet Alternative provides no clear idea of the growth pattern.

The failure to use realistic growth assumption means that this DSEIS not only does not provide adequate information on the alternatives; more importantly, it cannot provide meaningful information upon which to base a preferred alternative.

The DSEIS has an underlying pro-center slant which appears to pre-judge impacts without substantive analysis.

The executive summary critiques the Fis/ED's recommendations relating to office parks on the unsubstantiated basis that it will undermine the centers alternative.

The DSEIS assumes that 35 to 65 percent of new growth will be redevelopment despite Fis/ED work questioning this.

The DSEIS consistently refers to centers as being based on high capacity transit; yet, there is no meaningful analysis of the impacts of the regional transit plan on centers. In fact, lack of rail is not determined in this draft to be a fatal flaw in centers development.

The DSEIS uses simplistic truisms and avoids the tough questions which I believe you should demand be addressed in the final SEIS such the environmental problems with redeveloping contaminated industrial lands and the cost of remediation.

What are the problems of crime and human services in denser urban area. What is the need for new water sources to support economic development in the next twenty years.

What is the cost and feasibility of making urban centers attractive and inviting, issues relating to parks, public safety and schools.

The analysis in the DSEIS fails to take into account important information and studies which are current and relevant to this analysis. The Fis/ED Task Force's Case Studies are not utilized. The Water Section is based on the 1985 Seattle Water Supply Plan instead of the 1993 plan (which has been out for over 10 months).

Finally, the DSEIS fails to address the most fundamental questions: What is the likely outcome of amending the CPPs and nominating centers? What will happen both inside and outside centers if the designated centers grow slowly, which the nominated jurisdictions indicate is likely to occur? What happens if non-center cities to do not curtail jobs and housing growth in their jurisdictions in order to focus growth into centers? Do these policies ensure appropriate locations to attract and maintain high wage/high value jobs such as those supplied by Boeing and Microsoft?

The CPP's as a vision for the next twenty years will direct us to somewhere - the question that the final SEIS needs to address is: what is the likely outcome of each of the alternatives in 20 years - what are the environmental impacts - and what opportunities are opened and foreclosed? Thank you for the opportunity to speak.

VANCE: I want to thank all the panelists who were invited to come today. I want to apologize for limiting your time in any way. Mr. Vyzis I could listen to you all day. We have to vacate this room at 1:00 and we have about 25 people who were not panelists who signed up to testify. In order for everybody to get a chance I would like you to take 3 minutes. It's drive folks, by one thing, that we have to vacate this room by 1:00. So, let's get going. We have Mr. Joseph Elfelt, followed by Pat Madison and Allison Moss, if all three could come forward.

Joseph Elfelt:

I live between Redmond and Duvall and have participated early and often in the GMA planning process as a citizen activist and I am delighted to be leading off for the public. I like the SEIS. I don't think the county should slow down. I don't think you should throw it out and start again. But there are two important flaws that need to be fixed in the final. This SEIS process is not occurring in a vacuum. It is constrained by the requirements of the GMA first and it's further constrained by the decisions the GMA Hearing Board have already passed out. The single most cost effective thing the county can do to improve this SEIS and further the entire GMA planning process is have the management and worker bees in the planning department and council staff read the decisions of the hearing board. They write with clarity, they are easy to read. In doing that the county will avoid, early on, stubbing its toes on the very same GMA mistakes other jurisdictions have already made. The two important flaws in this document both relate to alternative four which is a precountywide plan policies. Alternative four is defined on page 9, column 2, paragraph 3. It reads the precountywide planning policies alternative is based upon the 1985 King County Comprehensive Plan, etc. In other words, alternative four is the old way of doing business. Alternative four is flawed because first, it is not a reasonable alternative as required by the SEPA WAC. In the Twin Valley case, the hearing board passed down, the board said "the most fundamental premise of the GMA is that the planning that was done under the authority of chapter 36.70 was insufficient to serve the quality of life enjoyed by residents of this state". Later on, the board in that same case said, "However, to enact GMA plans and regulations that are bound by the old way of doing things will perpetuate the very flaws of the past that the legislature explicitly set out to correct." So alternative four is the old way but the purpose of GMA was to bring about a new way of conducting business when it came to developing plans. Because alternative four perpetuates the old way it is not a reasonable alternative according to the

mandate set down by the legislature when GMA was enacted. It ought to be withdrawn from the plan. If alternative four lingers on then all aspects of alternative four should be brought into that alternative. By that I mean, one important feature of the 1985 mindset was automatically put into each of the alternatives considered in the plan. And that is the second major flaw. That piece, that big piece, of the 1985 view of the world that I'm referring to is the proposed new fully contained community located in the rural area between Redmond and Duvall. The aspect of this proposed island urban growth area as a feature of alternative four is part of the alternative, that in this SEIS, has the most significant adverse environmental impacts of any alternative and it ought to be taken out of the other alternatives and put into alternative four. Thank you.

Pat Madison

I am Chair of the King County Coordinating Committee of the League of Women Voters of King County.

The Leagues of Women Voters of King County have been following the Growth Management planning process with a great deal of interest. Our members have participated in task forces on Fis/ED and Affordable Housing and a League representative also serves on the SEIS Task Force. Our Growth Management Committee is reviewing the SEIS and the Leagues will send written comments on that document before the February 28 deadline.

We believe that the environmental analysis of Phase 2 of the CPP is an important process, and that the SEIS is therefore a document of significance. We appreciate your holding the hearing today to give the public an opportunity to respond to the document. We note also that a series of Open Houses is being held this month for the same purpose. Many citizens are trying to find time in their busy schedules to listen to the SEIS and to write responses. Comments are just beginning to come in. We ask that you all try to keep an open mind until the close of the review process, and until all responses have been received and considered.

When analyzing the draft SEIS it is useful to remember the basic assumptions and agreements upon which it was based.

Local elected officials agreed on the Bookend Concept, which encompasses a range of five alternatives and several policy variables, moving all the way from a pre-Countywide Planning Policies set of conditions to the highly concentrated growth patterns of eight and 14 urban centers. The analysis was also to include several policy variables such as a no-RTP variation. If you have problems choosing any alternative in its pure form, the SEPA process allows for an ultimate choice of anything that fits within the bookends. Many of us expect these variations will occur. We foresee that a hybrid alternative will be the eventual outcome and be designated as the preferred alternative.

The SEIS does not stand alone, however. It works in concert with products and findings of various task forces, including fiscal analysis from the Fis/ED Task Force which will be presented in an accompanying document. Together these analytical tools will form the basis for elected officials' final decision on how to refine the July 1992 Countywide Planning Policies.

FIS/ED generated data, including case studies and a recent bus tour, are said to demonstrate potential difficulty in assuring that housing targeted to urban centers is affordable. It is also said they indicate that many of the nominated urban centers may have problems reaching their population and job targets, or meeting the urban center criteria, within 20 years. This challenge can be addressed in several ways with reasonable options which might include minor adjustments to criteria or time frames, or tiering or hierarchy scenarios as spelled out in Vision 2020.

In addition to comments concerning the EIS, we have a few other thoughts for you to consider as you move forward in this process.

There must be a greater emphasis on public participation for all growth management activities throughout the duration of the planning process. This will require fast work and much more funding than has been allocated, but it is essential that this occur. The planning process is coming to a head now, with some hard decisions about to be made. Citizens, businesses, interest groups, stakeholders, people of all persuasions will be significantly affected by these decisions. It is essential that they be fully informed and that their concerns be heard, and receive response, to a far greater extent than currently planned.

The basic growth management decisions before us--major choices on land development patterns, how we provide and pay for infrastructure, how we provide for a vibrant economy, a healthy environment and affordable housing--these decisions are essentially interrelated and far reaching. The tradeoff between urban density and suburban sprawl suggests that, to the degree that we achieve one, we will get less of the other. We have some important choices ahead of us and we must be sure we fully understand the long-term as well as the immediate implications.

Remember the legislative intent of the GMA. We are trying to accomplish orderly, efficient growth patterns with long term viability, while assuring a strong economy and protecting our environment and quality of life.

Be careful about conclusions drawn from the urban center case studies. They don't show fatal flaws but they do identify challenges and areas where we need to concentrate more effort and creativity.

We urge you again to keep an open mind until all the public response have been received, and to remember the larger purposes which brought about the growth management act in the first place. The concerns of citizens in

your districts are very important, please seek them out and be certain you have heard the full range of views they have to offer. But consider the general public benefit as well. From areas which have managed growth poorly or not at all, there is much to learn from us here. Thank you for giving these important matters your most serious consideration.

Allison Moss

Thank you for the opportunity to speak and particularly for spending your lunch hour doing this. I am speaking today on rural issues as they are explained in the DSEIS and also trying to relate them to both the previous CPP and the rural task force recommendations. My address in 1145 Broadway Plaza, Suite 1360, Tacoma 98402. Before I mention what our comments are, I like to ask you to think about a comment heard earlier. I'm surprised that anyone, especially an attorney, would remark that the purpose of an EIS is to raise questions but not answer them. I've been in the land use practice for a pretty long time and I thought that was precisely the purpose of an EIS was to tell you, as the decision makers, what the impacts of various choices would be. On the rural issues there is eight of them. The rural densities suggested for evaluation by the task force of 20 and 35 acres. The suggestion that rural levels of services should be established. The suggestion that a rural forestry zone be created. The need for recognition of resource based industrial uses specifically mills. The suggestion that anyone who owns more than ten acres should be required to clustered. The assumption that environmental regulations in the county now don't really apply in the rural area. This theme goes throughout the EIS for some reason alludes me. The suggestion that the rural area is a permanent, never to change in the future designation and the suggestion that a special vesting rule should be created for rural areas. Most of these come out in the task force recommendations. On the 20 and 35 acre zoning suggestion the DSEIS doesn't indicate what's wrong with the current 5 and 10 acre zoning that applies in the vast majority of the rural area. What is the problem that we are trying to fix with 20 and 35 acre zoning. When it does go through its discussion, the only conclusion is that the county should work with rural area residents to further define what activities are considered rural. Then apply them as mitigation to these development scenarios. That is on page 48. I don't know what that means. But there is no problem identifying the impacts of the down zones suggested and I would submit it is not necessary. 5 and 10 acre zoning has done a good job. Secondly, the DSEIS suggests that limiting the opportunities in the rural areas will reallocate those people to the urban area. I ask you to strongly consider that suggestion. Most people I know who choose a rural lifestyle would not opt into an urban area particularly centers as envisioned in this plan. Rather they would probably move to another rural area if they don't have an opportunity in King County. I think I've told you privately about my legal assistant who couldn't afford property in King County. He wanted several acres 2 1/2 to 5. He lives in Sedro Wooley. He is not going to move into Seattle. He's going to drive from Sedro Wooley at 3:30 in the morning to come to work in

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downtown Seattle. Let me switch to resource based industrial use, which is on page 3 of my outline. There is a policy ED-10 which strongly supports and it encourages the siting of resource based industrial uses in close proximity to the resource. We strongly support this. It is the only recognition anywhere in the policies that there are appropriate industrial uses in the rural area. Specifically, things like mills. The DSEIS says that maybe this will have an impact on rural character if you define rural character not to include resource base industrial uses. What does that mean, this is a tautology. Again we ask you again to strongly support those kinds of uses. You did that in the Enumclaw and Snoqualmie Community Plans which were recently adopted. The rest of my comments are in the outline and I would be happy to talk with you about any of them at any time.

Gregory Hill, 1215 North 47th Street, Seattle

I support the current document although I do believe the transportation element gives an inadequate description of the impacts and costs that would result if we do not exercise stricter controls on sprawl. I attended last week, a conference in San Francisco sponsored by the local government commission which dealt with planning, mixed use development and sustainable development. Their experience and the one they're trying to get out of is our experience. That the growth pattern based on sprawl that we are currently pursuing is not sustainable. It's been said that this growth pattern is what people want. That you must build on the next farm in order to create affordable housing. That it is fruitless to think people will accept more dense environment. In my view, people will live where housing is available. If the county enables the developers to build on wetlands, farmlands and low land forests, if the county prioritizes road buildings to afford this type of development then people will in fact live there. On the other hand if the county enables infill development, restricts the available area to grow in the rural areas and stops building roads to accommodate that sprawl people will live in more urban areas. In San Francisco, we heard bankers point out that urban land can be 7 times more expensive than rural land. An amount that must be factored into their loan concerns. However, you can't really stop there, you have to look at the entire equation of affordable sustainable living. California has also documented that low income people in California now spend 20% or more of their income on transportation. That's not very affordable when others walk to work. The same is undoubtedly true for the rural areas of King County. (unclear language) the cost of delivering services including roads to rural areas is very expensive. The Puget Sound region is currently spending over \$2 billion a year on highways, roads and parking. That's not affordable. In spite of that amount, congestion continues to grow. In ten years population has increased in the Puget Sound area by 35%, while driving has grown by 135% and it's on a vertical curve. The rekindling of growth will surely give us a 20% increase in driving which the DOT readily admits is not possible to serve. In fact, they cannot add 5% to lane miles a year, yet alone 15 or 20. The obvious conclusion is that major increases in congestion will occur if we

continue our current growth pattern. And that is what is wrong. We need to do several things. One, we need to tighten the urban growth boundary. It was pointed out very clearly that is the key to any kind of growth management. The bankers have pointed out that there is too much commercial zoning. It actually makes their life very difficult and risky. Office parks need to be severely limited or eliminated altogether. We must begin to put maximum lids on parking to encourage infill and reward infill development. King County, in particular, must stop building its own facilities in rural settings and start putting them as infill. The bottomline is that King County must stop the urban apartheid which facilitates the flight of upper income white people out of all of the cities while sucking the tax resource base out of those cities. We have to be more dense in the future. Thank you.

SULLIVAN: I have a question. It is rare that I get a chance to hear from one of my constituents in these settings, so I am going to take a rare opportunity, and ask, I know that you think about these things very carefully Greg. Could you show me the documentation that you used for creating your comments today. Because you are expressing some issues that are very important and I just want to make sure that when I am taking this into consideration that I have good documentation on the positions I'm taking. Please respond to me in writing.

Tom Harman, 2302 West Beaver Lake Drive, Issaquah

A lot of things that I was going to say, the previous speaker has spoken on so I think I will be relatively brief. The EIS does not address the cost of providing infrastructure to the urban area, particularly up on the Sammamish Plateau, which was designated urban in 1985 and is within the urban growth area of the other alternatives. But who is going to provide the costs and so forth? Also the density of urban areas in that area, can it support 7-8 units per acre? Is it going to be mass transit in (unclear language) urban amenities in that area? It's something to think about when this particular document is just accentuating sprawl by putting houses out in that area. The issue of affordable housing, and the EIS talks about either eliminating or reducing mitigation payments to make housing more affordable. What this generally does is just takes the burden from new homeowners to existing homeowners so the infrastructure to support urban growth and who's going to pay for it? What happened is a lot of the affordable housing in Klamath, that was built 10 years ago now people cannot afford the property taxes on their homes and they are moving out of these so called affordable housing. Another thing is the viability of the inner city. As infrastructure dollars are being spent in outer areas to support growth, then that means the inner city is starved of infrastructure dollars that it needs to grow and we need to have a viable inner city. That's one of the things you can compare San Francisco to Los Angeles and I think we in this community need a viable inner city and make the inner city a place where people want to live and I think money (TAPE NEEDED TO BE TURNED OVER -- SPEAKER KEPT TALKING) They are

already building a lot of houses in areas right up to the urban line within MPD's being proposed in Bear Creek and projects being proposed on the Plateau. So I think we need to have some kind of phasing. So we're not building for the next five years, we are building for the next twenty years. Thanks so very much for your time.

Ken McCarty, 42934 SE 173rd Street, North Bend

The last two speakers have said a number of things that hit on what I want to hit. In particular, the comment on urban apartheid. I grew up in the east. I saw what happened to New York City. In my employment I had the opportunity to go to Los Angeles many times, and I can see what happens when you do not control the growth. What you get is urban decay and suburban sprawl. Now that is happening in the Seattle right now and I don't want to see the Seattle area become like Los Angeles. And unless we do something now, it is going to become like Los Angeles. One comment was made, we need to delay until we have all the information available, you will never do anything if you wait that long. Another comment was made, make small changes. You'll never get there then. Seattle area needs some basic changes. The urban center approaches are basic changes that have the hope of changing this community from the direction of being more like Los Angeles, to being a community where a large number of people can live in a reasonable environment. Thank you.

Steve Claggett, 1419 NE 107th Street, Seattle

I am speaking today for myself and Carlo Keegway who is the Executive Director of the Seattle King County Housing Development Consortium. Mr. Keegway is also a member of the Affordable Housing Task Force of the Growth Management Planning Council. Mr. Keegway was not able to be here today because of a prior commitment. My background is in housing development. I headed a Washington development corporation for 13 years until 1992. That corporation built 110 housing projects in King County that provided 1,800 units for affordable housing. I am also currently sitting on the Quality Urban Environment Project of the county as a developer representative. Both Mr. Keegway and I urge the Council to stay the course on the growth management planning. Mr. Keegway wishes me emphasize to you that the planning that is taking place to date, that he's been a part of, has been an inclusive process and has not been segregated on (unclear language). It's been a process involving all economic segments of the community including developers. The DEIS sites the work that was done by the affordable housing policies, that it actually goes further than the DEIS and that's true and I would urge the council to consider as part of this impact analysis process allowing the affordable housing task force work to go forward from this point. There was a recommendation made quite a while ago that that process continue even while the EIS was being worked on and I support that. There is tremendous cost to sprawl they further segregate our community economically. They require immensely expensive

new roads because of the geographic distances that must be covered and increasing separation of jobs from home sites. Those who have us cross urban growth boundaries or develop outside urban centers besides housing affordability is one of the reasons the geographically constraining development will drive up land costs and with it housing costs. Yes, housing costs may rise but knowing the land price per housing unit need not rise if there are higher average density. No, we will not create slums or sub quality communities, we will be building better communities and (unclear language) poor land development practices that began with the return of troops from World War II. Even if you could build a cheaper house and cheaper land across the boundary or outside an urban center the true cost to our community and to lower income families who might live there would not be cheaper. This is not covered by the DEIS and there's a statement on page 59 that says that the relative impacts between the various alternatives are minimal. We disagree with that and in totality if you take into consideration all the costs of the people that will be living in those houses that there are dramatic differences between the different impacts. I want to second what several speakers before me have said about the social costs of the various alternatives. I don't think that that is something that has been looked into by the DEIS. It's not something that is required by WA State law but it is something that you can look into and I think that the social costs of the alternatives presented needs to be looked into and perhaps put into the fiscal report that I understand is still to come out. There are great disparities that could be created by continuing sprawl that would create an (unclear language) to them situation that would, as other speakers have said, drain the economic resources we need from inner city areas and create great disparities. These are real impacts that need to be studied. Finally, there has been a lot of talk today about the market. I recently read a book that talks about self-regulatory urban design and at some point you reach self-organizing urban design. I think we are past the self-regulating stage, we can no longer put the patches on little fixes (unclear language) on the highway. It's a time when we have to look at some radical new approaches and that's going to require tremendous leadership on the part of our political leaders and I urge you to provide that leadership. We are going to need to go out there and put in some examples. The market doesn't exist because people haven't seen the kind of urban centers that we are talking about that can be built. Also magnet, there is not an either or between the magnet approach and some of the other alternatives. We need both regulation and incentives to make these things work. Thank you very much.

Tracey Burrows

I am the Planning Director for 1000 Friends of Washington, which is a citizens organization, a statewide organization that was created by community leaders throughout the state to be a watchdog for the Growth Management Act.

We are here to comment on the draft SEIS for the Countywide Planning Policies. We have heard its critics talk of "fatal flaws". But let's take a closer look. The SEIS is a supplement to the environmental impact statement for the Vision 2020 plan. The document builds on years of regional planning efforts and was not intended to be read in isolation. It was guided by a balanced SEIS task force that had representatives from a wide range of interests and its basic planning assumptions, including the choice of alternatives analyzed, was the product of agreement by elected officials from throughout the county.

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We've heard a lot this morning about the flaws in the land capacity analysis in the SEIS. The capacity analysis is, without question, the most detailed analysis done by any county in Washington to date. It is based on the best available information. In fact, the analysis may underestimate available capacity, because it assumes that there will be upzonings within the King County or its cities over the next 20 years.

Today's hearing is a key point in a thoughtful public dialogue on the Countywide Policies and the future of King County. Public involvement is the foundation for any plan that will stand the test of time. We shouldn't rush to judge the SEIS or the Countywide Planning Policies before the public comment period is over. The SEIS before you is a draft and is intended to be refined by input from today's hearing and written comments.

As we refine the SEIS, let's not forget why the citizens of this county overwhelmingly support sensible, planned growth. If King County goes back to business as usual: We will consume all the vacant residential land within the urban growth area in less than 20 years; Congestion will worsen rapidly, seriously eroding our ability to transport goods and services. In the past 10 years, traffic has grown at four times the rate of population; We will not be able to attain the quality of life that we desire. According to a recent survey by the Puget Sound Regional Council, 74% of King County citizens would like to live in a place where they could do without a car-where they could walk or bicycle to shopping and take transit to work.

Within King County there are many very committed people who are working hard to make our older urban environments more livable and to create a sense of place within our newer suburbs. Urban centers are not part of a plot or a radical departure from past development patterns. They are a part of history. They are existing places like Capitol Hill or places that are yet to be, like Federal Way's new town center. If the definition of centers in the countywide planning policies is too confining, then let's look at ways to make it more flexible.

There is room in our county for everyone to have a choice of lifestyles. But we must make our choices carefully--we cannot carelessly destroy the qualities that we treasure in King County.

Jobs and economic development must be a part of the plan. The important work of the Fis/ED Task Force should not be overlooked. Their proposed economic development policies expand job opportunities within the County.

Affordable housing is a critical issue and we must all look for creative solutions. But is housing on the urban fringe really affordable? Can we as a society afford to subsidize that fringe housing by paying for the new roads, schools, sewers, water and other services that are needed to serve far-flung development. Can our young families afford to spend four hours a day commuting on congested roads--hours away from our children at a time when so many of them need guidance and leadership. We need to find ways to build affordable housing in Seattle, Kent, Auburn, Lake Forest Park, and Redmond. Otherwise we will sacrifice everything for the illusion of affordable housing that is really devastatingly expensive for us all.

The SEIS doesn't have all the answers. We must continue to ask the tough questions that must be resolved. Moving toward workable solutions can do nothing but strengthen the county's plan and make our future more secure. We must all be willing to compromise--we shouldn't slavishly cling to a rigid definition of centers if a more flexible definition is appropriate. Nor should we dismantle years of public consensus and good planning to go back to business as usual.

Thank you for your consideration of these comments.

DERDOWSKI: Mr. Chair, I have a question for Tracey. Thank you very much for your thoughtful testimony. As usual, I know you have been following the GMPC process, you are a regular attendee. Has your group been invited to sit on any subcommittees of GMPC?

RESPONSE: Our president has been represented on the SEIS Task Force.

C. A. Jardaine, 18784 Richfield Road NW

I have three comments. First, I am gaining a tremendous amount of respect for the quality, and sincerity and dedication for the people on the Council. So my comments here I direct to give you some advice to make your job more palatable or easy. Number 1: Taking the SAO, that's a tough ordinance because it needs to be tough because a good tough rule forces you to have ways in which you can minimize the harshness of the impact on that rule. But without tough rules that have to be adjusted to make reality fit, you don't have anything that is going to be workable. I recommend what Mr. Derdowski had said some time ago, there needs to be panels to minimize the impact in individual cases but not change the basic tough law. Number 2: I spent some 35 years in making forecasts for business clients who want to go into a variety of different businesses. Same thing that you folks are doing here. You are trying to forecast what is going to happen to our King County community. Everything can change therefore you must

base it on some facts that you start with which is history plus a little guess into the future. Your document here is flawed. It should be flawed, it can't be perfect, it will never be perfect. You have got to start with what you have. The key however, is to have instrumentation built into it. So that when, in my case, the sales don't generate, you counteract that. When the expenses get too high, you counteract that. So in your process, going ahead, build into each of the various facets because there are so many facets in that big comprehensive book. A hearing panel that can solve that little problem within the general framework of what you're trying to do. Thank you.

Joel Haggard, Attorney-at-Law

Thank you members of the Council. On page 2 of the SEIS, bottom left hand column and continuing to the top right hand column it identifies for the reader that the Council and the Growth Management Planning Council have made decisions with respect to the urban rural line in the East Sammamish Community Area. My client in reviewing this document indicated that he was well aware of what those changes were, but the common and ordinary reader of course, would not know. He then asked me what I felt about the SEIS. I indicated it was draft, at which point he showed me Map A and the 4 maps that are in Appendix A. He became extremely frightened because I became speechless, almost. The difficulty was that the Map A and the four maps are absolutely contradictory to, out of date with, and inconsistent with the result of the King County Council and the Growth Management Planning Council regarding the designation of the Alderra property as urban. This is a similar situation with respect to (unclear language) and Beaver Dam. We would urge you, as a committee or individually as councilmembers, to explore and rectify this area so that there is fully disclosure as to what has occurred. The Executive staff, the Executive, the Council and the GMPC all have concurred in the results and the decisions of the East Sammamish Community Plan. This draft should concur with it.

VANCE: Mr. Haggard is this just a technical error in drawing the map? Have you pointed this out to the planning department?

RESPONSE: Yes, I have been in discussions both with Mr. Reid and Mr. Larsen and have appreciated their comments. While I tend not to speak for somebody else and let them speak by themselves, the review of the document appears that substantially it has included in its analysis the associated number of units for the urban designation of the property. Unfortunately, the map is in error and this I think could be easily corrected as they go to the supplement. I don't think we want to cause....you know it's kind of like Basil Vyzis earlier today was talking about the third law of thermodynamic. I was trained as a mechanical engineer and I think this is an example of the second law. That is, whatever we do increases the entropy of the universe. The entropy is

a measure of disorder. I'm sure this disorder can be taken care of. Thank you.

Virginia Sweetland, 16821 - 455th Avenue SE, North Bend 98045

I basically have been following King County Comprehensive Planning since 1972. I looked through my old files and my earliest book is the 1972 draft of the general development guide so I can't go back to '64 but I did follow the planning pretty carefully through 1985 and the adoption of the comprehensive plan. I was on the citizens advisory committee for the Snoqualmie Valley Community Plan which spanned the adoption of the 1985 Comprehensive Plan. Last summer I attended all of the meetings of the Rural Character Task Force which were so ably chaired by Councilmember Phillips and so well represented by Councilmember Derdowski. I generally agree with the recommendations of the Rural Character Task Force now I have to say that I have had a lapse because I did not know that the DSEIS was available for review until I saw the notice about the meeting today and I have to say that I have not read the DSEIS. I do intend to get a copy and I do intend to read it and I hope that the written comments I will submit will still be taken into consideration. I've enjoyed being able to be here today and I thank you for the hearing because I've learned a lot and taken down a lot of notes from the previous speakers which I will comment on in my written testimony. Just a few brief points, one speaker asked what's wrong with what we have been doing for the last 30 years? I think this was pointed out in Vision 2020. What we have been doing is not sustainable and as one speaker said, I think it was Ken McCarty, it leads to urban decay and suburban sprawl. Both of which bear tremendous cost associated. I'm neither a chemist or an engineer, I won't get into that. I am familiar with hamburger, my family eats a lot of hamburger and if what I see in the way of suburban sprawl subdivisions that have been put in place under the way we have done business in the past, if that is hamburger, then I would hate to see steak. What we need is more affordable housing. I just wrote down the name of Steve Claggett, one of the speakers as embodying principles with which I am very much in agreement with. I agree with Allison Moss, which is not too usual, that the need for industrial base in the rural areas is very important. This is one of the subjects we talked about on the Rural Character Task Force. With that I will submit my written comments to you. Thank you.

VANCE: There will be another chance to testify.

Chris Lehman

I am a resident of Seattle. I am a resident of a very dense neighborhood. One that is becoming denser. In fact, all the residential land lots in my neighborhood of Eastlake are multi-family zoned. We are undergoing some of the pressures and impacts of growth. We have more traffic. We have a lot of disruption. We have construction and we're not against that. We are

willing to accept it. We realize that this is needed in order to have a more rational system of land use. And it is very painful and it's not always easy but fundamentally we want to be assured that this ongoing density in ours, one of the densest neighborhoods in Seattle is being purchased for something of value and that is we want to be assured that as our neighborhood becomes more dense the countryside that this process of densification is meant to protect will in fact be protected. We want to be sure that the urban rural line is maintained. I lobbied very hard for the Growth Management Act and I chair a statewide alliance of neighborhood associations which was very active on behalf of that law. We were invited to the signing of it. The reason why we managed to have an alliance of urban, suburban and rural groups is because of that bargain. Density, but also maintain the urban growth boundary so that the countryside is protected. Let me say a final word about the alternative. I am always surprised to hear about all the attorneys suddenly making arguments against the environmental impact statements. In fact if the B&O Tax had been in fact extended to legal services, as it probably should have been, the state would have made a real, and probably the locality would get a share of that would have made a huge windfall today on the amount of attorney time that has been spent trying to poke holes in the EIS. The fact is, this is really an excellent job. It is not supposed to be the whole story. The project level EIS's are going to provide a lot more of the detail that they seem to want. This could go on forever if they were to insist on a perfect job. Fact is that this is a very thoughtful EIS which represents a range of alternatives. I don't happen to support the magnet alternative. I think that the magnet alternative is a kind of Trojan horse for breaking the urban growth boundary and continuing a sprawling lifestyle as Greg Hill mentioned is just aiming us towards continued devastation of our environment. But I do feel that the magnet alternative represents one extreme and the various center alternative another from which we can cobble together a very good composite. There are some excellent things in the magnet alternative, including least cost planning, benchmark monitoring there is no reason why those cannot be incorporated into the centers alternative. Undoubtedly what we will end up with, and it will be a good alternative and a good conclusion, will be a modified centers alternative, with some magnet aspects. I compliment the work of all the people that went into this EIS, and thank you.

Gordon Kinder - Conservation Division of the Mountaineers

We are an outdoor and recreation organization that is state wide, and headquartered here in Seattle. Mr. Layman articulated basically most of what I would like to say. We favor the urban center alternative, but feel that it needs to be refined, and there are probably some good ideas from the magnet alternative that can be incorporated into a viable hybrid option. Essentially our message is to build up and not out, I agree with what Kathy Fletcher said earlier that density is a very potent tool to protect the environmental quality which is so important here, and makes it such a unique and pleasant place to live, with the close proximity of an urban area

to rural areas. I echo what Mr. Layman said, please do not move the growth line east, adhere to that. Your major constraints here are time, transportation, water and the growth line. Please pay particular attention to the issue of water supply, that will be a controlling factor in the future. You should only change behavior in small steps - that may ultimately prove to be the case if you try to implement the urban center approach, it may not be politically viable, there may be lots of complications. However, we don't have the time to really experiment, and provide a paradigm or a test, which was what someone else suggested earlier. There was a reference to the third law of thermodynamics, which as I understand it, not being a physicist, is that you can't force this process. I would point to Hong Kong, where there are tremendous densities and a very thriving economy, with very severe constraints on transportation in particular. If you accept the premise that someone said earlier that transportation is the major environmental threat it might be an interesting example to look at. I have had a physicist tell me that if something is attempted to be forced and it's not moving, it just isn't being forced hard enough. I think that is pretty much the approach that is probably warranted in our current condition. I also think it's a good idea to provide incentives as someone pointed out earlier and to adhere to the timetable and also public participation dimension to this process, it's very important. Emphasis should be continued to be placed there. Thank you for the opportunity to testify and I will be submitting written testimony.

Mary O'Farrell, 23708 NE 70th Street, Redmond

I would like to put in a word of support for the urban centers alternative which could most effectively be served by mass transit and hopefully high speed rail in the near future. I too have spent some time in China and Hong Kong and I agree with the previous speakers analysis of how they have been able to cope real well with extremely high densities and yet maintain a very attractive place to live and there are many transportation choices in Hong Kong that wish we had in the Seattle area. I support the SEIS finding that the urban rural growth line needs to be held where it is now or even moved in closer to the city and existing urban areas to preserve some of the open space and farm land which is west of the line. I would propose that the urban island created in the 1985 Comp Plan, the Bear Creek Master Plan Developments which leap frog urban growth into rural areas be taken out of the feature proposal. This area has virtually no existing infrastructure and is a couple miles east of the urban growth line. This and other master plan communities located on the urban fringe are not needed at this time. We have been working on an issue this week in which they are attempting to delink the infrastructure of the interchange in Redmond from these developments. This is just an example of how, even plans which are called out for very specifically are watered down and not implemented. I am very concerned about having the high density urban growth right next to the rural areas. I would take issue with the characterization of undeveloped lands as being vacant land because its not just a slab of asphalt sitting out in the middle of nowhere. It's a very productive area which is the lungs and

kidneys of the county and also the source of water and pure air for our good quality lifestyle and recreation area also. Thank you.

John House

I appreciate those members who have stayed with us this morning. We appreciate it Chairman Vance. My name is John House and I live at 38207 SE 45th Place, Snoqualmie. I think the SEIS does the job it set out to do and I think it is really important for this committee and the Metropolitan King County Council to respect the process which is gone on already including the citizen input and the difficult policy decisions which have already been made during the year's effort that has already gone into this. I think it would undermine public support to switch major policy decisions this late in the process. I think that the centers policies combined with some of the incentive ideas contained in the magnet proposal best meet our needs. I think that citizens are willing to accept substantive lifestyle changes to protect rural areas from sprawl. I think it's time to make some clear choices to protect what we all value as special about living here in the Puget Sound area. On my way in this morning Chairman Vance I heard you on the radio and you were saying that you had some concerns about pushing growth out of King County only to have it burden our sister counties to the north and the south. I had thought, and do believe that both the Growth Management Act and the Vision 2020 regional transportation plan are good forums for bringing about the joint planning and operation among those counties and I would hope that the county council would use those forums to make sure that they were not just squishing growth out of here and into there and that it is a regional solution. Thank you for your time.

Tom Sanderson

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I would like to say a few words about the problem that Mr. Haggard brought up earlier. I live right in that area and I noticed some peculiar on the map as well, immediately when I reviewed the SEIS. But I thought that the East Sammamish Community Plan located the urban rural line in a different location than what was recommended by the GMPC. What I thought was that the maps weren't exactly wrong they just assumed that the urban rural line will ultimately be located as recommended by the GMPC. However, this does leads us to an inadequacy in the EIS. It includes no analysis of impacts caused by the 1993 East Sammamish Community Plan not adopting the GMPC recommended urban rural line. This is critical because the 1993 East Sammamish Community Plan extended urban growth and Metro sewer from the Sammamish Basin to property entirely within the Snoqualmie Basin. Past county policy was to deny Metro sewer extensions to properties entirely within the Snoqualmie Basin. The East Sammamish Community Plan violated countywide planning policy LU-14E by extending urban growth across the watershed boundary into an area that is predominately undeveloped and rural in character. The problems associated with this are that it will stress infrastructure unnecessarily and it will impact an

undeveloped watershed with a healthy native Coho salmon run. These impacts and other impacts of locating the urban rural line someplace other than as shown in Figures A-3 and that all of them are not addressed in this document, or least I couldn't find where they were addressed. Until we have proven technology to mitigate water quality and water quantity impacts of developments on undeveloped salmon bearing watersheds I recommend that the urban rural line be located at watershed boundaries instead of extending it to undeveloped watersheds with highly valued native salmon runs. Thank you that concludes my comments.

(END OF PUBLIC COMMENTS)

GMHE Committee Meeting
February 9, 1994

WRITTEN COMMENTS - HANDOUTS

J. Taylor Washburn, Foster Pepper & Shefelman
Steve Hallstrom
Gerry McDougall, Washington Natural Gas
Holly Kean, East King County Regional Water Assoc.
Paul Barden
Weyerhaeuser Company & Weyerhaeuser Real Estate Company
The Leagues of Women Voters of King County
Greater Maple Valley Area Council
Gary Upper
The Cosmos Group
Joli Imperatori
Keith Dearborn - Real Growth Facts -- King County
Housing Units Per Acre

COMMENTS ON COUNTYWIDE PLANNING POLICIES DSEIS

by

J. Taylor Washburn
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Metropolitan King County Council

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INTRODUCTION:

- Last appearance 10 days ago on economic development & GMA process
- Today's focus is on CPP and environmental review; complements FIS-ED
- Your role as policy-makers to pull two together, along with wealth of data from other sources, and set long-term course for County and region.

SIGNIFICANCE OF CPP & DSEIS

- CPP as benchmark for 33 local plans
- Ultimate Allocation of population and jobs is a key to local plans. Simply dividing up 20 year population forecast among cities in large part due to their own wish list is:
 1. Not the formula for efficient use of limited regional resources;
 2. Not a model of type of coordinated economic planning which lends itself to a regional economic strategy.

For example, Seattle has included ambitious projections for employment growth, both downtown and in industrial areas. Yet the latest draft of City plan fails to show how pay for environmental cleanup and redevelopment costs which only increase the price of doing business. Nor does the notion that multi-story industrial buildings seem likely to achieve large number of jobs Seattle seeks. The County and CPP issue is whether Council wants to take away other siting

opportunities for businesses we want to keep and attract based on hope of Seattle and other jurisdictions?

We have similar issue with those jurisdictions such as Federal Way which ask for substantial increases without any clear evidence that these population jumps likely to happen.

- Role of SEIS: to help policymaker make informed decisions
 - How well does this measure up?

MY PERSPECTIVE ON SEIS:

- As FIS-ED member, a committee which focuses on 2 areas SEIS not purport to factor in:
 1. Fiscal impact
 2. Feasibility of alternatives
 - DSEIS only look of impacts of alternatives
- Thus, you well-advised to place limited weight on its conclusions
 - Put another way, the SEIS doesn't really try and answer the key question: will the 14, 8 or Magnet Alternatives WORK?
 - SEIS merely states if all happen as it should in theory, here are impacts.
 - On this level, SEIS unremarkable in finding 8 centers use less land than No Action or Magnet
 - But question NOT answered in SEIS is what happens if 8 centers doesn't achieve goal, i.e. if after pouring \$\$\$/resources into funding centers, people and jobs don't come? The activities of FIS-ED and other groups are raising serious questions on the extent to which future jobs and population are likely to develop in centers versus other areas outside of centers, but within urban areas.
- Case Studies found:
 - Except for Seattle and maybe Bellevue:
 1. Residential CPP criteria unlikely to be achieved unless very ambitious incentives/government action beyond what in CPP now.
 2. Job employment targets equally unlikely, especially in suburban areas.

CONCLUSION

- Given credible doubts on basic assumptions related to 8 and 14, and uncertainty on impacts Magnets, not adopt a County Plan until you have
 - a) better understanding of alternatives & tie to eco development etc
 - b) integrated results and changes in CPP Phase II into your County Plan
- If you opt for a Preferred Alternative from 8 or 14 Centers options, be prepared to substantially increase incentives and other aggressive strategies to reduce the gap between the theoretical potential of Centers, which is what SEIS dwells on, and the emerging analysis which suggests that centers are unlikely to achieve in 20 years anywhere close to theoretical density.
- Be sure to ensure that assumptions of each alternative have been proven to be realistic before adopting it
- Recognize that under all alternatives, but especially centers-based alternatives, government will have to step up and provide substantial subsidies to provide housing opportunities in urban centers for those with less than 80% of median income.
- Use the GMA window of opportunity, starting with CPP and into County Plan, to promote and work into law and long term CIP the foundation for economic development and prosperity on which our quality of life is founded - a good job and a home.
 - Accomplish this through incorporate regional economic study into CPP and County Plan and through taking the lead in "mapping" County to identify the best places for anticipated future development.

Metropolitan King County Council
Growth Management, Housing and Environment Committee

February, 8 1994

Chair Vance, Council Members:

Thank you for the opportunity to comment on the draft SEIS for the CPPs, in particular on the Land Use analysis.

At the broadest level the analysis covers the options and the impacts of the policies adequately given that this is a phased review of a non-project action. The data which is used to represent the rural area reflects much more closely what is happening on the ground than what has previously been produced by County reports. An encouraging signal to those who recognize that the rural land is being developed at much higher densities than the ballyhooed 5 and 10 acre densities of the 1985 Comp. Plan.

I believe that the data clearly supports the "center" alternatives as the least environmentally degrading, the best for meeting affordable housing and the most likely to provide for economic development when all costs are considered. All costs include the cost of loss of land and degradation of the environment, factors which most likely will not, but should be, included in the fiscal analysis. It is past time that economists recognize that resource lands and the environment have value not measured in the market place, especially given the premise of sustainable development.

While the data support the center alternatives, the narrative is less precise. Reading only the analysis and not including the Mitigation Measures the narrative is highly biased toward the Magnet alternative. Clearly the authors want to include benchmarks and incentives as essential to the implementation of the GMA. As written and described the Magnet alternative fails a test of reasonableness. Goals will be set and incentives used. Rules will be promulgated as the development occurs.

Imagine applying this to a team of teenagers on a playing field. The goal is to get the ball to the some place on the field. The incentive, a new car. The benchmarks: no injuries and do it in 30 minutes. 10 minutes later monitoring shows two broken legs. A new rule, no clipping below the belt. 5 minutes later, three bloody noses. Monitoring produces a new rule, no hitting above the neck. And who is making the rules. Each jurisdiction initially makes their own driven only by the incentives. And there is yet another new appointed body to referee.

The Magnet Alternative is the Graham/Rudmann alternative. Like Graham/Rudmann Deficit Reduction it sets lofty goals but no-one is held accountable for achieving them. And it should be pointed out that Graham/Rudmann included monitoring and benchmarks. Without enforcement policies the debt only increased, as will environmental impacts with the Magnet alternative.

In the Mitigation section the Draft SEIS acknowledges this shortcoming and suggests that the "good policies" of the CPPs be implemented to give the Magnet alternative substance. I have long advocated incentives to supplement and where feasible replace regulation. If our culture had strong communities, matching the strong ethos of the market economy, this option would be more feasible. The centers alternatives provide a basis for building those communities.

The market ethos shows in the "least cost" modeling. Does least cost consider the social and human costs of the disenfranchised, the homeless, the high crime rate and deaths in the impoverished neighborhoods of the county? Does it include the \$25,000 annual cost to house criminals? Does it even consider the \$5,000 annual cost of owning a car that the auto-friendly areas require. Well designed urban centers with employment will help mend our deteriorating social fabric.

The narrative discusses impacts. The "centers" impacts are characterized as adverse, while other alternatives are more often just noted as "changes". There is no justification given for this language. If in building centers, open space, parks, community and civic centers, the arts, and other urban esthetics are primary, where is the justification for calling them "adverse". Building such communities should have a positive impact on the human environment and hence the natural environment. Imagine what renovating Bellevue's CBD could mean. All the traffic congestion gone, no more 3 minute stop lights. The new park accessible and used. Try Bellevue on foot, transit or bike today. Not many do because it isn't a functional community.


At the same time narrative word smithing is used to downplay the impacts of autos. The alternatives that depend most on the expansion of roads are described as increasing the auto-friendly area. Autos are our major polluters and they result in more impervious surface than any other form of transportation. Consider this from an ecological perspective. Instead of auto-friendly, the ecological term for these areas is environmentally damaged. Go back and re-read the sections substituting "environmentally damaged" and see what sense it connotes.

The analysis assumes all centers will have the same characteristics. One mitigation that should be considered is defining different levels of urban centers. This was proposed in the Vision 2020 model and recognizes that downtown Kent might never be like downtown Bellevue. Choice is one of the drivers of the market and choice in urban centers should be provided as long as the density suffices for transit and pedestrian occupancy and work places.

Use of current zoning biases the analysis toward the auto-friendly alternatives. While this technique provides a base level for comparison it does not recognize that inherent in any centers alternative is rezoning of the CBD. Once that assumption is applied then the centers alternatives are clearly best.

Incentives, monitoring and benchmarks all can be used as tools in achieving the goals of GMA. Benchmarks need to be independent of the planning process least they be like achievement test scores - the results tainted by the process. In achievement tests there is teaching to the test, in benchmarks setting goals with predetermined conditions. The latter allows the claim that the 1985 Comp. Plan met its goal of keeping development in the urban area. To report that 95% of growth was urban is not representative as the "urban area" included the sprawl that ultimately culminated in the GMA.

The policies of all three task forces strengthen the CPPs environmental protection. Except for the business/office park proposal in the Economic Development policies their inclusion in an amended 14 center alternative will provide the citizens of the county the most environmentally, socially and economically strong framework for future.



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February 9, 1994

Comments on the utilities section of the SEIS
to Metro King County Council

Good morning.

My name is Gerry McDougall. I serve as Vice President for Special Projects for Washington Natural Gas. We're a privately held natural gas utility, serving 286,000 customers in King County.

Thank you for the opportunity to comment this morning.

WNG fully supports the goals of Growth Management to ensure that King County remains a great place to live and work---for us and for our children. Through involvement on the Fis/Ed Committee and one-to-one work with planners, WNG has been active in the GMA planning effort.

Today, I bring you our comments on the draft SEIS. I appreciate the magnitude of the SEIS task, particularly given the aggressive timetable on Countywide Planning Policy adoption. However, I'm concerned that King County risks adopting policies that are based on good intentions instead of hard facts. This document is not an adequate tool with which an elected official might make an informed decision on the Countywide Planning Policies.

Specific to our business, the SEIS discusses private utilities, but it does not provide any depth of information that would allow WNG to adequately assess impacts of the various alternatives on our company and on our ability to provide service to our customers---now and in the future.

The theme, as stated in the introduction of the utility section, is "...the more concentrated development in urban areas...the more efficient and cost effective the delivery of utility services."

The Eight and Fourteen Center Alternatives are said to have the greatest potential for energy efficiency and positive impact on the delivery of utility services.

The "cost-effectiveness" or "affordability" of density has served as the underpinning of King County's the Growth Management planning effort. But we do not understand how this "cost-effectiveness" or "affordability" can be achieved through high density land use. Everything we've studied says there is a point at which increasing density increases cost of service and reduces efficiency.

Our experience within our service area drives home this point---our operations and capital costs are the highest in densely populated areas. It costs more to serve gas customers in Seattle than in Bellevue; and it costs more to serve gas customers in Bellevue than in smaller cities; and so on.

This is true not just in King County, but throughout the nation. We've

looked at operations and maintenance costs for natural gas utilities nationwide. Cities with greater densities — greater populations per square mile and more utility customers per square mile tend to be more expensive places to serve gas. We suspect the same is true for other utility service providers.

These higher costs of density don't end with natural gas service. If you look at cost of living indicators such as groceries, housing, utilities and transportation, the trend holds. Dense cities like Boston and Washington D.C. are more expensive places to live than Albuquerque and New Orleans.

I remain very concerned that these policies will make it tougher for our employees to find affordable housing within King County and will send prospective customers outside our service area to Skagit, Kitsap and Kittitas counties by artificially constraining the supply of land.

Before we buy off on a plan calling for significantly increased densities,

let's be sure we take an honest, sober look at what that might mean to the residents and businesses of King County and what the physical, environmental, social, economic and political impacts will be.

I look forward to continuing to work with you and county planning staff to achieve a plan that can fulfill the vision of a strong economy and desirable living environment.

Thank you.

[see attachments]

POPULATION AND DENSITY STATISTICS

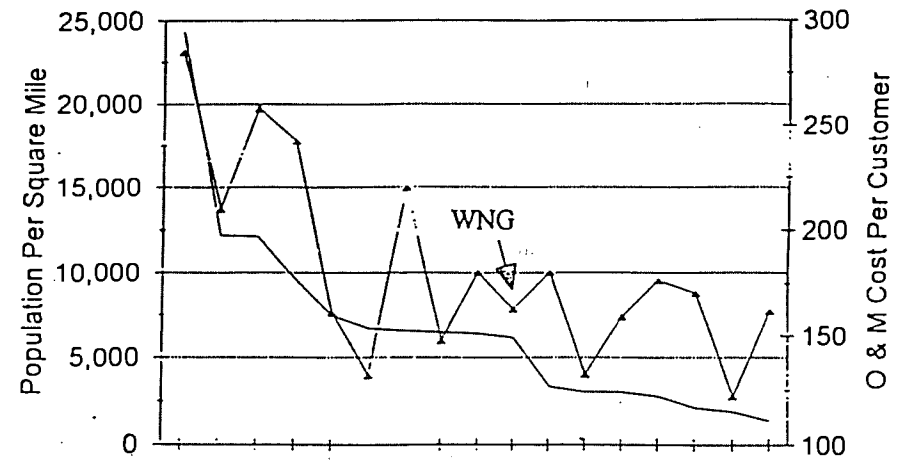
—NCCOR— The Universal Almanac, 1990 census —

ACORA Cost of Living Index

City	O&M Expense Per Customer	1990 Population	Square Miles	Population Per Square Mile	100% Composites	12% Grocery	28% Housing	9% Utilities	10% Transportation	8% Healthcare	35% Misc.
New York, NY	284.85	7,322,564	301.5	24,287	214.2	144.7	373.7	171.8	124.3	202.1	150.8
Chicago, IL	208.83	2,743,726	228.1	12,054	121.9	108.2	154.3	121.7	101.5	124.3	107.2
Boston, MA	257.75	574,283	47.2	12,187	136.9	114.0	175.6	145.7	131.1	140.0	113.2
Philadelphia, PA		1,545,577	136.0	11,358	131.5	118.5	145.6	189.4	112.7	128.0	118.6
Miami, FL		356,548	34.3	10,433	106.5	97.2	109.9	124.2	106.5	122.4	100.4
Washington DC	242.37	626,800	62.7	9,978	134.7	119.2	184.2	115.3	123.1	135.4	122.2
Los Angeles, CA	183.96	3,485,388	467.3	7,459	120.1	110.4	181.4	84.3	112.6	131.0	113.1
Minneapolis, MN	131.73	364,383	55.1	6,608	100.2	93.6	106.0	91.2	104.5	106.2	96.0
Memphis, TN	219.89	678,068	95.8	7,088	104.9	102.2	124.5	92.2	103.3	100.6	94.6
St Louis, MO	147.96	306,585	61.4	5,000	94.6	100.7	95.0	105.5	97.9	102.3	93.0
Cleveland, OH	177.13	505,818	79.0	6,400	110.1	101.9	117.8	128.9	108.9	112.1	102.4
Washington Natural Gas	182.60	816,288	83.7	9,740	117.7	117.3	146.8	124.4	110.7	138.8	106.8
Cincinnati, OH		264,040	78.0	3,385	103.0	89.7	108.3	107.5	90.1	96.6	108.1
Denver, CO		487,810	106.8	4,570	84.0	103.3	92.3	73.3	94.8	96.6	85.5
Toronto, ON	180.38	332,943	84.2	3,954	105.5	103.0	108.8	114.9	103.8	96.1	102.2
Portland, OR		437,386	120.7	3,624	108.2	89.0	127.1	70.8	112.8	127.4	102.1
San Diego, CA		1,110,548	328.6	3,380	132.3	108.1	185.5	71.2	129.8	134.3	106.4
Omaha, NE		335,795	100.0	3,358	91.1	93.0	83.0	92.6	105.5	97.8	91.4
Columbus, OH	180.38	637,958	189.8	3,355	107.8	105.3	112.6	108.6	112.2	105.6	103.1
Dallas, TX	132.21	1,006,831	333.0	3,024	103.8	96.8	98.5	97.7	113.1	96.7	113.3
Atlanta, GA	154.78	304,017	131.2	2,319	99.3	93.3	96.6	97.8	103.7	108.5	101.8
Abuquerque, NM		833,937	329.1	2,544	92.7	93.0	85.0	77.3	107.4	99.5	96.0
San Antonio, TX		1,530,872	578.3	2,620	99.0	97.8	84.4	101.8	117.8	108.5	95.6
Houston, TX	178.49	423,390	145.3	2,910	108.5	100.4	101.2	69.0	102.8	120.5	114.0
Tucson, AZ	178.49	943,403	392.8	2,394	96.7	97.0	91.2	92.9	115.4	111.7	100.1
Phoenix, AZ		458,936	199.4	2,299	96.8	97.0	84.8	138.3	104.3	83.8	95.3
New Orleans, LA		364,033	159.0	2,291	99.8	95.8	96.5	107.8	95.8	103.2	101.9
Charlotte, NC		810,337	264.1	3,031	94.2	95.9	82.1	90.0	103.6	97.3	101.1
Memphis, TN		741,952	351.8	2,108	95.3	97.4	92.5	92.7	95.8	95.1	97.2
Indianapolis, IN	170.48	513,342	247.3	2,084	87.8	91.2	82.1	94.6	111.9	96.4	102.2
San Jose, CA		247,183	191.1	1,293	84.8	94.9	83.5	101.4	103.5	90.7	99.5
Austin, TX	172.06	463,577	246.8	1,878	94.5	94.5	83.5	108.7	105.4	106.1	94.4
Fort Worth, TX		447,818	269.8	1,659	95.5	94.2	93.9	92.4	97.1	98.3	97.2
Kansas City, MO	161.84	435,141	317.4	1,371	92.2	96.7	87.8	91.2	92.1	82.4	95.6
Nashville, TN		510,784	479.5	1,065	93.3	97.1	84.0	105.5	100.8	102.7	97.3
Jacksonville, FL		835,230	752.2	1,111	91.1	92.1	78.2	102.9	97.3	96.5	95.4
Columbus, OH		644,730	631.1	1,021							
Average - 100 sq. mi. density		2,205,264	135.0	13,408	141.0	118.8	187.3	144.7	118.2	142.0	118.3
Average - 10-12 in density		894,974	131.5	6,842	106.7	102.3	125.8	96.0	105.3	112.7	102.2
Washington Natural Gas		816,288	83.7	9,740	117.7	117.3	146.8	124.4	110.7	138.8	106.8
Average - 13-18 in density		617,726	180.4	3,359	108.1	101.5	118.7	93.0	109.9	118.2	101.0
Average - 19-24 in density		788,074	284.2	2,772	99.2	96.5	84.4	97.0	107.3	110.4	100.7
Average - 25-30 in density		521,294	235.5	2,215	95.4	94.9	87.3	102.5	99.7	94.6	99.0
Average - 31-36 in density		488,847	420.6	1,162	93.9	95.3	85.2	100.9	99.4	96.1	96.6

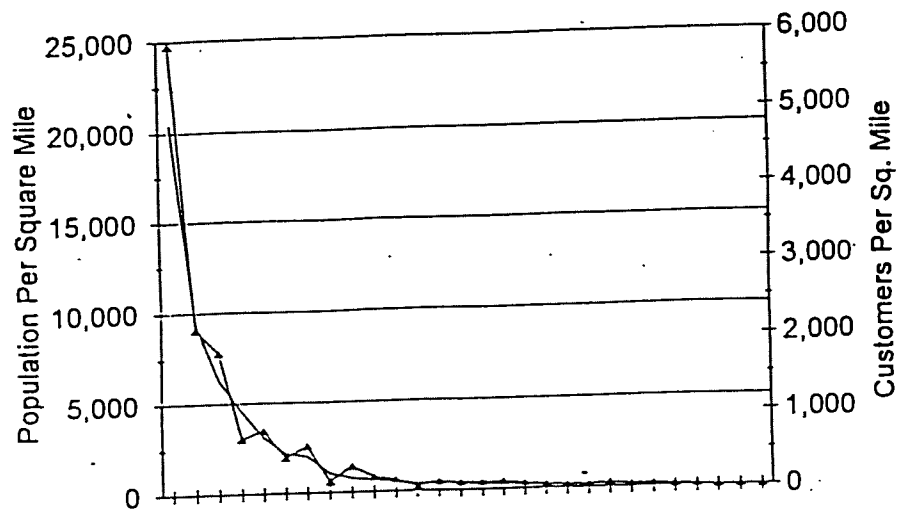
Pop. Density vs. O&M Cost/Customer

Shown for 17 Utilities



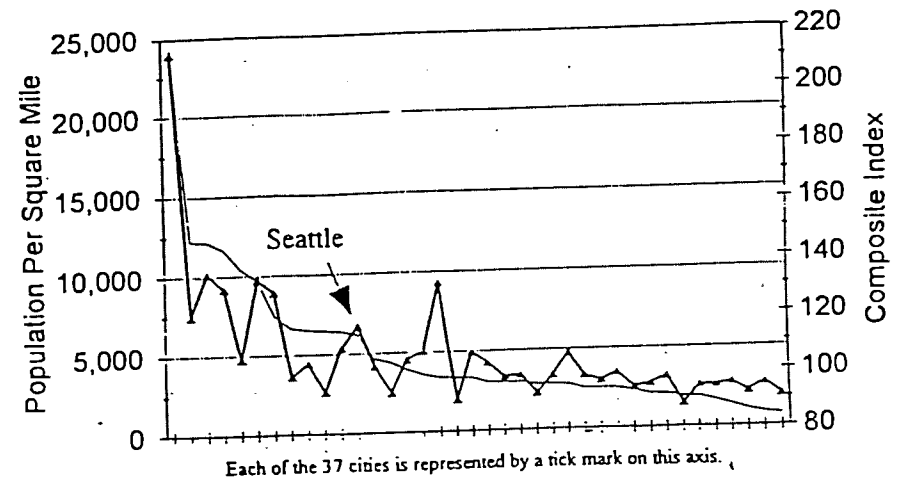
— Population /Sq. Mile — O&M Cost/Customer

Pop. Density vs. Customers /Sq. Mile
Shown For 28 Utilities



— Population /Sq. Mile - - Customers / Sq. Mile

Population Density Vs. Cost of Living
Shown For 37 Cities



— Population /Sq. Mile - - Composite Index

Each of the 37 cities is represented by a tick mark on this axis.

EAST KING COUNTY REGIONAL *Water* ASSOCIATION

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February 9, 1994

TO: Jane Hague
Metropolitan King County Council
Growth Management, Housing and Environment Committee

FROM: Holly Kean
Executive Director

SUBJECT: Draft SEIS for Countywide Planning Policies

WATER SUPPLY - CHAPTER 8

COMMENTS

1. This chapter needs to state more forthrightly that new water sources will be needed to support economic development strategies and continued population increases from internal growth and in-migration no matter how successful we are at conserving water as the next source of "new supply." Although sound policy, conservation is a stop-gap measure to give us the time - 15 to 20 years - to find, plan, allocate, and build a new source. No matter how the population is arranged on the King County landscape, a new major water source is needed. We are not deferring a decision to build new sources by the use of conservation. We are doing all things possible to stretch our current supply so King County residents can continue to maintain their current lifestyle with a minimum of sacrifice.
2. King County has long had a policy which discourages the extension of major utility infrastructure into rural areas unless a water quality or supply problem is identified. This is buttressed by code language which puts teeth in the policy. To my knowledge, there are few, if any, problems implementing the policy. So, I am puzzled by several references to the possible need for major improvements to the rural utility system infrastructure. King County policy translates to individual homes on a well or lots created by shortplat or small subdivisions being served by a well(s). If major infrastructure improvements are needed in rural towns or cities, the SEIS should be more precise.
3. Class A water systems contain 15 or more connections; Class B systems contain 2 to 14 connections.

4. The references to the 1985 Seattle Water Supply Plan on page 126 are out of date. The situation is now quite different. The discussion should be based on the 1993 Seattle Water Supply Plan.
5. In addition to conservation, individual utility exploration, and the potential of the North Fork of the Tolt River, the Seattle Water Department and the East King County Regional Water Association are exploring the possibility of locating a major regional groundwater source in the Upper Snoqualmie Valley. Application has already been made to the Department of Ecology to drill an exploratory well.

The proposed intertie between Tacoma Water and the Seattle Water system from Pipeline 5 should be discussed as another source of water. The quantity, however, will not be known until Tacoma completes its negotiations with the Muckleshoot Tribe. And, if construction is not begun on Pipeline 5 by 1996, it will put additional stress on the Seattle Water Department system as many of the South King County purveyors rely solely on groundwater. Cities such as Federal Way do not have a surplus water supply unless Pipeline 5 is built.

6. I agree that construction of more multifamily development will reduce water supply needs. However, the reduction should be quantified because I'm not certain it will be significant.
7. The concentration of growth will not necessarily have much impact on the need for new water sources. It will, however, have an effect on infrastructure needs. Infrastructure needs and source needs should be discussed separately.
8. The DSEIS should emphasize that a change to policy RU-16 is needed if we are to build new supplies. Public facilities for these new water sources will have to be constructed where the water source is located. The Cedar River system, constructed at the turn of the century, was built in the hinterlands because that was the location of the source. I do not know of any major regional sources which could be developed in the urban areas.
9. The reuse of treated wastewater should be included as a potential new source of supply. Although I do not believe it is a viable source because King County does not have many large, single users for the treated wastewater, it is part of the water supply scheme. Unlike Pierce County which has the Simpson Kraft Mill using at least 8 MGD, King County has small users by comparison. The construction of a distribution system would be very costly because of the lack of concentration of large water users. Use of the system would

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be for only 2 to 3 months out of the year. It is also unknown if treated wastewater substituted for potable water to flush the Hiram Chittendam Locks can increase our water supply. The Department of Ecology may decide the saved water is needed to enhance the instream flow in the Cedar River.

10. There was no discussion of groundwater as an important source of water for King County. Groundwater supplies 22 percent of the urban population. This source needs to be protected from contamination and the reduction of the urban aquifer recharge areas by inappropriate placement of high density development.

CHAPTER 9 - Stormwater Management

The value of stormwater runoff has increased among groundwater purveyors. They believe the current policy of capturing runoff and channeling it into water courses should be reviewed for a more balanced approach. Twenty-two percent of urban King County's population uses groundwater as its only source. Runoff helps recharge aquifers.

CHAPTER 15 - Water Quality

The importance of protecting groundwater from contamination should be emphasized as 22 percent of King County's urban population depends on groundwater as its only water source.

February 8, 1994

intended COMMENTS ON THE CPP DRAFT SEIS

The purpose of this SEIS is to analyze the probable effects of a reasonable range of alternatives for ~~the~~ countywide planning policies. To do this, the ~~SEIS~~ SEIS should be based on data sets which reflect realistic growth patterns.

Unfortunately realistic growth data was not used. IN THIS DRAFT

- Fis/Ed Task Force work clearly identifies that 14 centers will not be built in 20 years; *based upon case studies rec'd by Grift Eastman*
- It is doubtful that 8 centers will build out in 20 years;
- The data set for the Magnets Alternative provides no clear idea of the growth pattern.

The failure to use realistic growth assumptions means that this Draft SEIS not only does not provide adequate information on the alternatives; more importantly, it cannot provide meaningful information upon which to base a preferred alternative.

DRAFT
The SEIS has an underlying pro-centers slant which appears to pre-judge impacts without substantive analysis.

The Executive Summary critiques the Fis/Ed's recommendations relating to office parks on the unsubstantiated basis that it will undermine the centers alternatives;

The DRAFT SEIS assumes that 35 to 65 percent of new growth will be redevelopment despite Fis/Ed work questioning this;

The DRAFT SEIS consistently refers to centers as being based on high capacity transit; yet, there is no meaningful analysis of the impacts of the regional transit plan on centers. In fact, lack of rail is not determined to be a fatal flaw in centers development.

IN THIS DRAFT

From Paul Barden

2/9/94

COMMENTS ON RURAL ISSUES
DSEIS, CPPS, AND RURAL TASK FORCE
Offered by

Weyerhaeuser Company and Weyerhaeuser Real Estate Company

Summary of Concerns:

1. Rural densities
2. Rural levels of service
3. Rural forestry downzone
4. Resource Based Industrial Uses
5. Mandatory clustering
6. Assumption that environmental regulations do not apply in the Rural Area
7. "Permanent" designation
8. Special vesting rule

The DSEIS Executive Summary indicates on p. ii that the policies recommended by the Rural Task Force encourage land patterns which support the traditional character of rural King County through preserving rural lifestyles and economies. While we wish to commend the task force for its hard work, on the topics which we wish to address we do not think this characterization is accurate and we ask that you seriously reconsider the policies discussed in this outline.

Specific Concerns

Rural Densities

1. The Task force asked that the DSEIS evaluate downzoning the rural area to 20 and 35 acres. That concept was explored and rejected in the development of the 1985 Comp Plan and again in the adoption of the Rural Zone. Instead, the vast majority of the rural area was zoned for 5 and 10 acre minimum lot sizes.

The DSEIS presents no evidence that this zoning has not protected rural character or rural lifestyles and economies. Indeed, it indicates that 85-90% of the residential growth has occurred within the UGA. DSEIS, p. 10.

2. The DSEIS conclusion on this downzone is particularly confusing. It concludes: The County should work with rural area residents to further define what activities are considered rural, then apply them as mitigation to

LA-17

10.
FROM
WHICH YOU
DEMAND BE
ADDRESSED IN
FINAL SEIS
SUCH AS:

DRAFT

- WHAT ARE THE
- The SEIS uses simplistic truisms and avoids the tough questions such as:
- environmental problems with redeveloping industrial lands and the costs of remediation;
 - problems of crime and human services in denser urban areas;
 - need for new water sources to support economic development in the next twenty years;
 - costs and feasibility of making urban centers attractive and inviting - issues relating to parks, public safety and schools.

DRAFT

WHAT ARE THE

The analysis in the SEIS fails to take into account important information and studies which are current and relevant to this analysis.

- Fis/Ed Task Force's Case Studies are not utilized;
- Water Section is based on the 1985 Seattle Water Supply Plan instead of the 1993 plan (which has been out for over 10 months).

DRAFT

WHAT IS THE

Finally, the SEIS fails to address the most fundamental questions:

- What is the likely outcome of amending the CPP's and nominating centers?
- What will happen both inside and outside centers if the ^{DESIGNATED} centers grow-up in a slow-phased way which jurisdictions indicate is likely?
- What happens if non-center cities do not curtail jobs and housing growth in their jurisdictions in order to focus growth into centers?
- Do these policies ensure appropriate locations to attract and maintain high wage/high value jobs such as those supplied by Boeing and Microsoft?

The CPP's as a vision for the next twenty years will direct us to somewhere - the question that the Final SEIS needs to address is: what is the likely outcome of each of the alternatives in 20 years - what are the environmental impacts - and what opportunities are opened and foreclosed?

these development scenarios. DSEIS, p. 48. What does this mean?

3. The DSEIS also concluded that limiting development within rural areas will re-allocate it to urban areas. DSEIS, p. 52. We must seriously challenge this conclusion, Urban and rural choices are not fungible. An individual seeking a rural lifestyle is far more likely to move out of the County to obtain a rural experience (with the potential of commuting greater distances to work) than to move into one of the urban centers.

LA-18

4. The DSEIS makes a sweeping conclusion that the policies recommended by the Rural Task Force provide for greater beneficial impacts on the environment than the CPPs and they would improve the extent to which the existing rural character would be preserved and enhanced. DSEIS pp. ii, xiii, 15 and 46. Yet DSEIS states that rural areas have typically provided what once was "affordable" and that restriction of land could create an exclusionary situation where only the wealthy will be able to afford homes "in the country." DSEIS p., 42. Are we then to conclude that such exclusivity is an appropriate public policy?

25 and 30 acre lots are not only not affordable to the vast majority of King County's residents, this tremendous downzoning will greatly devalue many families' principal asset.

Rural Levels of Service

5. Re Task Force Policies RU-10, RU-12 and RU-15, while we would all agree that some service standards should be different in the Rural Area (e.g. gravel shoulders and drainage swales rather than curb, gutter and sidewalk) we are concerned that Rural Task Force Policy RU-13 will unduly restrict rural options. We ask that this policy, if included in the CPPs, be amended to read:

...Pavement width should be no wider than needed to meet safety considerations and accommodate permitted densities and designated bicycle/pedestrian routes.

Rural Forestry Downzone

6. Re Rural Task Force Policies RU-1, RU-2, RU-5, as King County Planning staff has acknowledged, a rural forestry zone and its implied downzone to 1 du/20 acres provides a strong incentive to remove property from the forest tax classification and the likely need to then

log it to pay the roll back taxes. We believe that this proposal will cause conversions as property owners seek to avoid further downzoning. It will be perceived as a penalty for having kept property in forestry. We have already begun to see this happen in both King and Snohomish Counties.

If land has long term commercial viability for forestry use, it should be designated forestry. If not, the County should encourage but not try to lock up smaller wood lots.

Surprisingly, the DSEIS does not even appear to evaluate the impacts of the suggested rural forestry zone.

Resource Based Industrial Uses

7. We strongly support ED-10 which encourages the siting of resource based industrial uses in close proximity to the resource. Yet, resource based industrial uses are not included within the Rural Task Force's Policy FW-RUA which states that it lists "the most important components of rural character" or in RU-11. If added to the CPPs, FW-RUA should be amended to include these kinds of uses.

The DSEIS states that ED-10 could have a significant impact on rural character if rural character is not defined to include resource based industrial activity. DSEIS, p. 46. Why in the world would rural character not be defined to include these uses?

This issue is of particular concern to Weyerhaeuser because it has two mills located in unincorporated King County. In the recent adoption of the Snoqualmie and Enumclaw Community Plans, you zoned both mills Heavy Manufacturing, expressly stating that you wished to ensure their long term viability. We ask that this support be reflected in the CPPs.

Mandatory Clustering

8. Re LU-12 and Rural Task Force Policy RU-6, clustering should be encouraged through incentives. However, it should not be mandated on all ownerships greater than 10 acres. See, DSEIS, p. 43. First, it is inappropriate to regulate differently by ownership. Second, the GMA calls for providing for a variety of lifestyles and rural densities.



THE LEAGUES
OF WOMEN VOTERS OF KING COUNTY

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County Environmental Regulations Apply to Rural Area

9. There seems to be an assumption environmental regulations and densities limits do not currently apply in the Rural Area. DSEIS, p. 42, states that increased densities under the No Action Alternative could cause a decrease in the quality of life due to a substantial change or loss of community character, unmitigated traffic increases, or insufficient levels of service. (See also p. 52 which states that the 1985 Comp Plan consists only of general recommendations and lack the stringency necessary for regulating development in a proactive manner.) The SAO, drainage manual, road adequacy standards, clearing and grading code, shoreline regulations and SEPA all apply in the rural area.

Rural Areas As Permanent Designation

10. The CPPs and Task Force recommendations treat the Rural Areas as unchanging and permanent. This approach conflicts with DCD's Procedural Criteria which suggests that policies should not foreclose eventual expansion of the urban area and common sense which indicates that, if King County is to prosper, some time in the future it will have to expand the Urban Area. Indeed, the DSEIS acknowledges that the UGA may be too tightly drawn. DSEIS, p. 51.

Special Vesting Rule

11. Finally, we have a question with Task Force RU-19.b which seems to revoke vesting if an extension in a preliminary plat is requested. First, to grant an extension, you must find good cause. Why would you then change the rules? Second, why would the County single out the rural area for this treatment? This policy should not be adopted.

TESTIMONY BEFORE THE KING COUNTY COUNCIL ON THE DRAFT
SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT FOR THE
COUNTYWIDE PLANNING POLICIES February 9, 1994

The Leagues of Women Voters of King County have been following the Growth Management planning process with a great deal of interest. Our members have participated in task forces on FIS/ED and Affordable Housing and a League representative also serves on the SEIS Task Force. Our Growth Management Committee is reviewing the SEIS and the Leagues will send written comments on that document before the February 28 deadline.

We believe that the environmental analysis of Phase 2 of the Countywide Planning Policies is an important process, and that the SEIS is therefore a document of significance. We appreciate your holding the hearing today to give the public an opportunity to respond to the document. We note also that a series of Open Houses is being held this month for the same purpose. Many citizens are trying to find time in their busy schedules to review the SEIS and to write responses. Comments are just beginning to come in. We ask that you all try to keep an open mind until the close of the review process, and until all responses have been received and considered.

When analyzing the draft SEIS it is useful to remember the basic assumptions and agreements upon which it was based.

Local elected officials agreed on the Bookend Concept, which encompasses a range of five alternatives and several policy variables, moving all the way from a pre-Countywide Planning Policies set of conditions to the highly concentrated growth patterns of eight and 14 Urban Centers. The analysis was also to include several policy variables such as a no-RTP variation. If you have problems choosing any alternative in its pure form, the SEPA process allows for an ultimate choice of anything that fits within the bookends. Many of us expect these variations will occur. We foresee that a hybrid alternative will be the eventual outcome and be designated as the preferred alternative.

The SEIS does not stand alone, however. It works in concert with products and findings of various task forces, including fiscal analysis from the FIS/ED Task Force which will be presented in a accompanying document. Together these analytical tools will form the basis for elected officials' final decision on how to refine the July 1992 Countywide Planning Policies

FIS/ED generated data, including case studies and a recent bus tour, are said to demonstrate potential difficulty in assuring that housing targeted to urban centers is affordable. It is also said they indicate that many of the nominated urban centers may have problems reaching their population and job targets, or meeting the urban center criteria,

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within 20 years. This challenge can be addressed in several ways with reasonable options which might include minor adjustments to criteria or time frames, or tiering or hierarchy scenarios as spelled out in Vision 2020.

In addition to comments concerning the SEIS, we have a few other thoughts for you to consider as you move forward in this process.

- There must be a much greater emphasis on public participation for all growth management activities throughout the duration of the planning process. This will require fast work and much more funding than has been allocated, but it is essential that this occur. The planning process is coming to a head now, with some hard decisions about to be made. Citizens, businesses, interest groups, stakeholders—people of all persuasions will be significantly affected by these decisions. It is essential that they be fully informed and that their concerns be heard, and receive response, to a far greater extent than currently planned

- The basic growth management decisions before us—major choices on land development patterns, how we provide and pay for infrastructure, how we provide for a vibrant economy, a healthy environment and affordable housing—these decisions are essentially interrelated and far reaching. The tradeoff between urban density and suburban sprawl suggests that, to the degree that we achieve one, we will get less of the other. We have some important choices ahead of us and we must be sure we fully understand the long-term as well as the immediate implications.

- Remember the legislative intent of the Growth Management Act--We are trying to accomplish orderly, efficient growth patterns with long term viability, while assuring a strong economy and protecting our environment and quality of life.

- Be careful about conclusions drawn from the urban center case studies. They don't show fatal flaws but they do identify challenges and areas where we need to concentrate more effort and creativity

We urge you again to keep an open mind until all the public response has been received, and to remember the larger purposes which brought about the growth management act in the first place. The concerns of citizens in your districts are very important; please seek them out and be certain you have heard the full range of views they have to offer. But consider the general public benefit as well. From areas which have managed growth poorly or not at all, there is much to learn for us here. Thank you for giving these important matters your most serious consideration.

GREATER MAPLE VALLEY AREA COUNCIL
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February 7, 1994

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Subject: Comments on the DRAFT SUPPLEMENTAL ENVIRONMENTAL
IMPACT STATEMENT for the Countywide Planning Policies

Ladies and Gentlemen:

The Greater Maple Valley Area Council is a fifteen member publicly elected advisory board representing residents of the unincorporated southeast area of King County, defined by the borders of Tahoma School District #409, and generally known as Maple Valley. The Area Council endeavors to present the concerns of our constituency to local and state government, assist local citizens, as appropriate, in their dealings with governmental agencies and act as a public forum on issues of interest to the local population. Related to these capacities we are pleased to comment on the above referenced Draft Supplemental Environmental Impact Statement (DSEIS).

Our format is as follows: General Comments followed by comments relating to Rural Areas, followed by comments relating to the specific topics addressed in the DSEIS in the same order as they appear in the DSEIS, and finally some conclusions.

GENERAL COMMENTS:

Unfortunately the DSEIS proceeds from the assumption that all of the planning alternatives (No Action, 8 Centers, 14 Centers, etc.) can be achieved as envisioned by the planners. (Reference page iii of the Executive Summary: "The expected or predicted outcomes of each alternative are based on planning assumptions regarding population and employment growth. Any

changes in these assumptions could substantially affect the outcomes." or page x of the Executive Summary: "For purposes of environmental review, the DSEIS assumes the action called for within the Countywide Planning Policies and the five alternatives can be accomplished, but does not estimate the costs or feasibility of achieving them.") Consequently the DSEIS does not in any way test the feasibility of any of the planning alternatives by exploring whether or not, and to what degree, the various planning options are realistic expectations of what could happen in the next twenty years. Because it accepts rather than tests these assumptions we find the conclusions that are drawn to be, for the most part, simplistic, obvious and basically useless. For instance, the conclusion stated on page ii of the Executive Summary indicating that the 14 Centers Alternative would consume far less vacant land than the Pre-Countywide Planning Policies Alternative and that the other alternatives would fall between these two bookends is abundantly self-evident providing you accept the theoretical premise that the 14 Centers Alternative, and the other alternatives, are achievable as envisioned.

The question we ask is this:

Is the GMPC and/or King County intending to provide a mechanism to test the assumptions made by the planners before proceeding with the selection and implementation of the preferred planning alternative?

It is our understanding that many people involved in the planning process do seriously question the assumptions made by planners and the GMPC relating to both population and employment densities in the Urban Centers. We further question the assumptions regarding growth in the rural areas and the assumptions regarding the reliance on public transit systems. It is the Area Council's position that it is very important that our planners work from assumptions that are realistic rather than simply idealistic.

RURAL AREAS:

One issue of concern to the Area Council is that as the proportion of population in the Urban Centers and other urban areas of the county continues to increase over that of the rural areas the already minimal political pressure that residents of the unincorporated rural areas can bring to bear to assert their needs will continue to decrease. In that sense all the alternatives, since they concentrate growth in urban areas, threaten the ability of rural residents to have any meaningful form of self-governance or significant input into the local political system.

Despite the claim, on page x of the Executive Summary, that the economic analysis to be provided by the FIS/ED Taskforce will examine costs "particularly in regard to their impact upon individuals, businesses and the public sector", it does not appear likely this report will in any serious way address that topic except as it relates to the public sector. In other words

impacts upon individuals and businesses will be largely ignored. The Area Council urgently requests that such analysis, relating to individuals and businesses in Rural Areas be conducted in a thorough and meaningful manner before any plan implementation. Of special and specific interest to us are the economic impacts on individuals relating to CO-16, Rural Water Systems.

The DSEIS does not address the issue of the possible creation of Cedar County. Yet this could have serious implications for King County's Growth Management Plan. It is common knowledge that the GMPC is relying to a great extent on the evidenced cooperation of Pierce and Snohomish counties to ensure that developers and investors have little choice but to work within the constraints of the GMPC plan or go elsewhere entirely. If Cedar County is created it is unlikely to be so cooperative; after all the push for its creation is due to a total dissatisfaction with how King County is doing business. The GMPC plan intends to put off limits an enormous amount of buildable land in what could become Cedar County in order to focus growth in the Urban Centers. By freeing up this land for development under favorable conditions Cedar County may provide developers and investors with a very desirable alternative business climate that could draw much of our regional development out towards Northbend leaving King County with a plan that won't work and possibly a new and expensive transit system that's in the wrong place. These concerns prompt the following recommendation:

- The SEIS should assess the implications, on its planning alternatives, of the possible existence of Cedar County and should, if those implications merit, and the possibility of the creation of Cedar County seems likely, suggest such modifications to the plan as would be necessary to address that situation.

Along these lines the Metropolitan King County Council should be aware that the activities of the GMPC are viewed with considerable suspicion by residents of the unincorporated areas of the county. In fact, in our area, the planning and policies already proposed by the GMPC and adopted by the old King County Council have served as the impetus for many citizens' involvement in the Cedar County movement. The new Metropolitan King County Council must now make a much more meaningful (and successful) attempt to effectively involve the citizens of the unincorporated areas in the planning process and it must find a way to convincingly reassure those citizens that the past actions of the GMPC, adopted by the old County Council, have not already put our destiny totally in the hands of the City of Seattle and the suburban cities.

Neither the previously adopted planning policies or the DSEIS address the importance of "hobby farms" to both the rural economy and the rural lifestyle (or rural character if you prefer that term). These 5-20 acre hobby farms do not provide owner families with a major source of income but they do allow for many other county residents to earn their livings serving the needs of these

hobby farmers. Feedstores, farriers, veterinarians, tractor and other implement dealers, garden supply stores, nurseries, and fencing suppliers and installers are all examples of trades, products and services that contribute to our local economy and are supported by rural area hobby farms. These hobby farms define rural character though you wouldn't know it from reading the Plan or the DSEIS. Drive out here and take a look. Rural character is not typified by pristine wilderness nor is it represented, in 1990s King County, by very many fully self-sustaining professional agricultural or livestock operations. We encourage the development of a plan for rural areas that recognizes the value of hobby farms both in terms of rural character and economic significance.

The DSEIS does not really address the fact that the GMPC's vision for the Rural Areas seems to be at odds with some of the specific Rural Area Policies. Since that vision is an integral component of the overall plan and since there is a significant economic implication to some of the policies we make the following recommendations:

- The SEIS should review the Rural Area Policies for consistency with the vision for the Rural Areas and for their possible impact on plans for incentives and disincentives aimed at focusing growth in the Urban Centers. For instance, allowing clustering of lots in Rural Areas may encourage residential development in those areas to the detriment of the growth of residential development in the Urban Centers and may further encourage the location of families anticipating a more suburban/urban lifestyle with higher levels of public utilities and public and private services to the rural portions of the county where the GMPC plan does not intend to provide or allow for the provision of such services. Further, lot clustering, when applied to rural areas, is at odds with the hobby farm lifestyle described above. You can't have a hobby farm on a clustered lot. The people who would choose to live in a rural area on a clustered lot will generally exhibit characteristics that can be just as well or better accommodated in a suburban or even partially urban setting. It seems to us that to be consistent with the overall planning vision lot clustering, a planning strategy that does have some positive application in suburban and urban areas, should not be overly encouraged in the rural areas.
- The SEIS should specifically address CO-16, the policy requiring professional management and maintenance of small group and individual family wells. This policy goes far beyond the intent of current federal and state regulations and will ultimately bring great pressure to provide full public water services in locations where it will be very costly to do so and will ultimately lead to higher development densities right where the GMPC plan does not intend for this to occur. This policy, by addressing a basically non-existent problem simply creates new and unnecessary problems and will result in a serious economic hardship for those affected residents in the Rural Areas. An investigation of that hardship would be a welcome addition to the final SEIS.

Page 47 of the DSEIS states that "Of particular concern currently to rural area residents is the absence of fire flow in their area because urban levels of water services are not provided." This is a remarkable statement and does not, in our view represent the sentiments of the great majority of rural area residents. These folks are well aware that, as desirable as fireflow capacity in itself may be, any imposition of such requirements on rural areas will result in the following undesirable impacts:

- Private and small group wells will be a thing of the past.
- Public water will, at great expense, (remember the current low densities and large lot sizes and how that will affect installation costs) replace those individual and small group wells.
- Extreme pressure to increase population densities in order to pay for the public water system will result in the loss of rural character and lifestyle that most residents so vigorously want to retain.

The above referenced statement relating to rural fireflow is not accurate and should be removed from the final SEIS document.

To many people in the rural areas of King County growth management, while "complex and exciting", is not considered the "healthy process" extolled on page iv of the Executive Summary. This is because rural residents have had no real representation on the 15 member GMPC that consists solely of elected officials. None of those elected officials has thus far shown any real inclination or ability to provide proactive representation for the residents of unincorporated King County. City of Seattle residents are well represented on the GMPC by their own elected officials, likewise the suburban cities have substantial representation by elected officials. Rural residents supposedly must rely on having their points of view advocated by county council members whose districts lie almost totally within the city limits of Seattle. To date the majority of rural area residents would dispute the claim on page v of the Executive Summary that "Thus the GMA is creating a lasting legacy of integrated plans and policies that make sense for the entire region".

LAND USE:

LA-5

LA-7

Even the DSEIS acknowledges that it is very unlikely that the Urban Centers can absorb anything near the amount of new residential growth that is delineated in the Urban Center Criteria and it further questions the job targets established for the Urban Centers. Though it may not be considered a fatal flaw that the Urban Centers will not reach their originally anticipated residential and employment goals within the twenty year planning period it is clear that some modifications need to be made to the GMPC plan to address that situation. The following recommendations relate to this issue:

- The GMPC should develop formalized alternate plans to accommodate a significant portion of the residential growth between now and 2010 that it previously intended would occur in the Urban Centers.
- The GMPC should develop, define and formalize policies that will encourage, to the greatest extent practicable, residential growth in the Urban Centers including significant incentives for private residential development.
- The GMPC should modify its criteria for Urban Centers to reflect the (lower) amount of residential growth that is realistically achievable.
- The GMPC should advise the R.T.A. board of the conclusion that it is highly unlikely the desired residential growth in the Urban Centers will occur between now and 2010 and the GMPC should work with the R.T.A. board to determine how this factor, combined with the GMPC's revised plans to accommodate that growth, should affect transit planning.
- Depending on how the GMPC restructures its plans to accommodate the additional residential growth that will apparently have to occur outside the Urban Centers the GMPC may need to review and modify its concept and policies relating to both the Urban Areas outside the Urban Centers and the Rural Areas.
- The GMPC needs to ensure that its plan has the flexibility to function under changing and/or unanticipated conditions while continuing to express its overall vision.
- There is little evidence that new "affordable" housing can, in a practical sense, be constructed in the Urban Centers. The GMPC should consider the affordable housing issue from the perspective of creating affordable housing through freeing up existing housing units rather than specifically building new housing that is "affordable". Generally new housing is going to be more expensive than existing but if new units can be made attractive enough to convince moderate and upper moderate income families to move from their existing homes or apartments this could, as a chain reaction, result in the availability of more affordable housing.

All the alternatives rely to significant extent on the redevelopment of existing industrial and manufacturing sites to achieve higher employment densities. This is particularly true of the 14 and 8 Urban Centers alternatives. Yet little attention has been paid to the issue of state labeling of hazardous and contaminated sites in relation to the feasibility of this redevelopment strategy. Thus far 68 sites within King County have been put on the state's list. Thus far 68 sites have been tested! This would indicate the distinct possibility that literally every industrial and manufacturing site within the county could end up on this dreaded list. It is simply a matter of how long it takes the state to complete all the inspections. Once a site is on this list it, at best, may be allowed to continue functioning in its current use and at current levels. At worst the site may become totally unusable for any purpose. Financial institutions are unlikely to want to participate in funding for redevelopment of Hazardous or Contaminated Sites. Potential buyers and developers are not likely to be enthused by the prospects of involvement with these properties. This is a very serious problem that needs to be specifically addressed in any

plan that relies heavily on redevelopment as a planning strategy. How does the GMPC intend to approach this issue?

A related matter involving the reliance on redevelopment to meet planning goals is the extreme difficulty, hazardous and contaminated sites aside, that companies face in today's regulatory climate if they must relocate even under the best of circumstances. In the past, though to a lesser extent than currently envisioned, redevelopment has played a significant role in expanding our economy and providing additional jobs. However, it used to be a lot simpler to relocate a small industrial or manufacturing business. Now it can take years and many tens of thousands of dollars in legal fees just to move a few miles down the street. Because of this these types of businesses may resist the prospect of relocation with some vigor. This issue is not addressed in the S.E.I.S.

Please consider the implications of both the above issues relating to redevelopment in the context of the following assumption, relating to the 14 Urban Centers Alternative, taken from page 23 of the DSEIS: "

"For both residential and commercial/industrial uses, 35 to 65 percent of new development will be redevelopment."

The DSEIS acknowledges (page 19, lower right hand corner) that "None of the areas proposed to be urban centers in the future currently meet the urban center criteria for both employment and housing with the exception of the University District in Seattle." In general that only one of the 14 proposed urban centers is in fact now an urban center would seem to cast some doubt on the feasibility of the urban center concept. In specific that the only proposed urban center thus qualified is the University District, an almost entirely taxpayer subsidized city within a city, provides some indication of just how likely (or unlikely) urban centers will be able to contribute positively to our overall economy.

TRANSPORTATION:

Which came first THE PLAN or THE CHOO CHOO? Reading the Countywide Planning Policies and listening to the supporters of that vision one might come to the conclusion that King County's Growth Management strategies are simply an after the fact justification for a very expensive mass transit project. Rather than a transit system that responds to the needs of citizens and businesses it seems we are trying to develop a scheme that will, by dramatically shifting our way of life, fit a predetermined vision for mass transit.

Over the past several decades public transportation in King County has not proven particularly successful. Very few people utilize the system. It has not been able to respond effectively to the needs of its prospective customers. The

percent of use of public transit as a means to get to work has decreased over the past decade (Table 5, page 76). Metro's normal response to lack of ridership has been to raise fares and cut service. Apparently that strategy has not solved their problems. Now we have a terrific new idea "Transportation Demand Management" or as it is known to aficionados "TDM". TDM is a swell series of disincentives designed to force people out of their automobiles through such means as excessive parking charges, added parking taxes, and higher fuel prices. We suggest that it's about time to try to give people some positive reasons to choose our transit system over other transportation alternatives. We also suggest that prior to initiating a new transit project costing tens of billions of dollars we should prove to the public that we can first fix our current more modest public transit services, making them an attractive alternative for commuting. The proof of our success will be increased ridership and possibly eventual public acceptance of the ambitious plans of the R.T.A. The King County - Metro merger seems to be the perfect opportunity to focus attention on our existing transit system. Only after we have learned to make it more successful will we have the knowledge and public confidence necessary to ensure the utility of the massive regional system envisioned by planners and leading politicians.

The specific message here in terms of the Countywide Planning Policies and the DSEIS is DON'T BUILD OUR ENTIRE GROWTH MANAGEMENT PLAN AROUND THE CONCEPT OF A FUTURE MASSIVE REGIONAL TRANSIT SYSTEM WHEN WE CURRENTLY LACK THE ABILITY AND KNOWLEDGE TO MAKE OUR EXISTING MORE MODEST SYSTEMS EVEN MARGINALLY EFFECTIVE.

HUMAN SERVICES:

The S.E.I.S. concludes that the alternatives that propose to concentrate growth into designated urban centers would result in fewer impacts on human services' delivery in rural and resource areas (page 102 Main Findings). This of course assumes that the new residential growth will occur in areas and proportions basically as envisioned by the planners and that such a result would minimize residential growth in the rural areas. It also apparently assumes that the increased funding required to provide human services in the urban centers and surrounding urban areas would not result in pressure to decrease funding for those services in the rural areas.

The projected characteristics of employment opportunities in the Urban Centers indicates an increase in lower paying service sector jobs that may not be self-sustaining. This will result in an increased per capita demand for human services, not necessarily in the Urban Centers but rather wherever, in the county, these new lower pay residents and their families determine to live. Increased demand and need for human services will result in increased per capita costs for human services. Will jurisdictions have the resources to pay the bill?

POLICE/FIRE/EMERGENCY RESPONSE:

The DSEIS fails to effectively address the issue of law enforcement costs related to the greatly increased population densities envisioned by planners. A feeble attempt is made on page 109 to discount the effects of density on crime by alleging that "previous research" indicates no strong conclusions can be drawn. Tell that to inner city residents being terrorized by gangs and drug dealers or who need security systems for cars, parking and residences.

PARKS AND OPEN SPACE:

The DEIS concludes that the 14 Urban Centers Alternative would have the least adverse impact on countywide parks and open space, though it acknowledges that this option will result in more adverse impacts to urban parks and open space within urban areas. If the Urban Centers concept is to work (regardless of whether it is the 14 or 8 Center alternative) it is very important that the Urban Centers be attractive and inviting to residents and workers. Numerous, appealing and well maintained parks and open space areas will be essential to this goal. The cost involved in maintaining and enhancing existing urban assets and in developing new Urban Center park and open space sites may be substantial but that investment will be a necessary component to make the Urban Centers concept work if that is the preferred alternative.

WATER SUPPLY:

What is the rationale behind CO-16 requiring Rural Water Systems to be "professionally managed and maintained by the applicable water purveyor according to the satellite management procedures of the Coordinated Water System Plans, and designed to rural standards."? Why does the Suburban Cities Association, which has no direct concern in this matter, feel so strongly that this policy, which will needlessly cost residents with individual or small group wells, in the rural, unincorporated areas of the county, thousands of dollars apiece on a yearly basis must be retained over the more reasonable version (RU-14) put forward by the Rural Character Taskforce?

CO-16, if retained, will result in extreme and needless economic hardship on rural residents who are already under-represented in the Growth Management Planning process, it will prompt the incursion of public water districts into the rural areas where the GMPC allegedly does not want them, (rural residents don't want them either) and it will most certainly, along with public waterlines result in additional, even insurmountable pressure to increase densities in the rural areas where, again the GMPC claims it wants to minimize densities.

UTILITIES:

15-4 The DSEIS accepts the GMPC assumption that "in general it can be noted that the more concentrated development in urban areas,...the more efficient and cost effective the delivery of utility services." One of our members, who also serves on the GMPC FIS/ED Task Force, informs us that information presented to that Task Force, by utility companies, nearly a year ago refutes that theory. Rather, according to the utilities, once a certain threshold of density is reached the cost for delivery of utility services begins to rise with increased density. Washington Natural Gas claims that costs to deliver services in Redmond are less than in Bellevue and that costs in Bellvue are less than those in Seattle.

SENSITIVE AREAS AND RESOURCE LANDS:

The DSEIS finds that many sensitive areas and resource lands are located in rural and resource areas. No kidding. Previously developed land in the urban areas has long since had all the sensitivity and resourcefulness blasted out of it! Nevertheless the DSEIS conclusion that the 14 Urban Center Alternative would have the least adverse impact in this regard seems an accurate assessment. Existing sensitive areas and resource lands are indeed located primarily in the rural areas of the county and assuming the various alternatives work at all as envisioned the 14 Urban Center scenerio would be the preferred alternative in the context of preserving sensitive areas and resource lands.

AIR QUALITY:

25-18 Many measures have already been implemented at the federal, state and local levels to improve air quality. The DSEIS accurately concludes however that: "In general, adverse air quality impacts will occur where growth occurs." All the alternatives under consideration assume similar amounts of growth though, of course, the manner in which the growth is handled does differ. The DSEIS conclusion that the 14 Urban Centers Alternative is the best alternative in terms of overall air quality is probably accurate though, in general, the differences between alternatives in this regard appear minimal.

ECONOMIC DEVELOPMENT:

EC-6 Page xi of the Executive Summary states: "In order to evaluate the differences among alternatives, the DSEIS assumes that under the 8 Centers and 14 Centers Alternatives, jobs and housing growth will occur in Centers in sufficient numbers to meet Countywide Planning Policies' defined criteria. In

reality, the Countywide Planning Policies require planning to accommodate the housing and jobs targets. Development to actually achieve the Centers' criteria may take more than 20 years for most Centers." Now here, addressed in one short disclaimer, are the two biggest problems relating to the feasibility of the planning process:

EC-6 There are serious questions as to whether urban centers can achieve the job and housing targets. Many involved in the process are convinced that the housing targets are simply not achievable in most designated Centers. Some doubt the ability of the Centers to meet the employment targets and further question, even if the targets are met, whether some of the types of jobs envisioned for the Centers will allow for self-sufficiency let alone actually contribute something to the overall economy. That is, if low paying service jobs are to be a significant portion of Center employment the rest of us may end up in effect subsidizing these jobholders through provision of human services and other government programs aimed at low income families. Planners should be focusing their attention on ensuring, to the greatest extent possible, that new jobs will contribute in a positive way to our overall economy rather than simply trying to squeeze in the most possible jobs per acre regardless of the economic viability of those jobs.

EC-10 This business about how, technically, Centers need only plan to accomodate housing and jobs targets not actually achieve them within the 20 year planning period is probably the biggest scam of the whole planning process. This technicality is brought up everytime anyone questions the Centers' housing and job targets. In effect what's said is that its not important whether or not the targets are actually met but only that jurisdictions have the required zoning in place. Yet virtually everyone agrees that we have to accomodate approximately 325,000 additional people in King County over the next twenty years and that the planning underway assumes the Centers' targets will be met and does not make any provision for what happens if they are not. For instance, approximately 145,000 people now reside within the geographic areas that define the proposed 14 Urban Centers. The 14 Urban Centers Alternative assumes that nearly 100,000 additional people can be encouraged to reside in those Centers in the course of the next twenty years. Is it a reasonable assumption to think we can jam that many more people into what is by far the most densely developed areas of the county? What about the economic consequences of such an effort? What kind of economic incentives and subsidies would be necessary to make this happen? Can we afford it?

CONCLUSIONS:

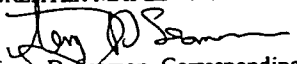
The Greater Maple Valley Area Council is not confident that the assumptions underlying the various planning alternatives, especially the 14 and 8 Urban Center Alternatives, are valid. Further we resent the lack of meaningful representation for residents of rural, unincorporated areas in the planning

process. We believe that lack of representation, and lack of advocacy for the views of us in unincorporated King County, has resulted in a plan that does not address our needs and is unlikely to work, in the unincorporated areas, as envisioned by the planners. We find that specific policies relating to rural areas are not consistent with the planners' overall vision and that some of those specific policies are likely to place totally unacceptable financial burdens on families in rural areas. We recommend that the Metropolitan King County Council re-think this entire issue and finds the means to effectively address our concerns. In this regard please remember that many of the problems we have discussed (such as CO-16) are already policies formally adopted by your predecessor, the former King County Council.

Thank you for your attention to our concerns.

Sincerely,

GREATER MAPLE VALLEY AREA COUNCIL


Terry D. Seaman, Corresponding Secretary

cc: Voice of the Valley
Gary Locke, King County Executive
Maple Valley - Black Diamond Chamber of Commerce

P.S. The following listed members of the Greater Maple Valley Area Council wish, by means of this correspondence, to declare their individual (as well as collective) rights before the Growth Planning Hearings Board with respect to review petitions as may be filed:

Vernon D. Graham
David O. Fields
Mel Wick
Warren Iverson
Robert B. Dixon
Jack D. Cairnes
Terry D. Seaman

Their signatures and addresses are recorded on the following page.

The Following individuals wish to present their rights before the Growth Planning Hearings Board with respect to review petitions as may be filed.

Vernon D. Graham 19201 225th Ave. SE. Maple Valley:

David O. Fields P.O. Box 189, Hobart WA 98025

Mel Wick 21204 SE 268th Kent WA 98042

Warren M Iverson

Warren M Iverson Box 55 Hobart, Wa. 9

Robert B Dixon 19313 Maple Valley Rd SE Maple Valley Wa

Jack D. Cairnes Box 368 Ravensdale 98057

Terry D. Seaman 29235 SE 208th Maple Valley Wa. 980

SUMMARY OF COMMENTS MADE TO THE KING COUNTY GROWTH

MANAGEMENT COMMITTEE

by Gary Upper

February 9, 1994

Concerning Capacity

1. If the Urban Growth Line and Urban Growth Area are permanent and forever, then the criteria used to set them should be set very carefully. Keep in mind that the GMA mandates that we have to meet our housing and commercial/industrial development targets. We cannot choose not to do that.
2. Housing capacity should be judged in terms of how well the potential supply meets the true needs of the market place. Inappropriate product should not count.
3. The reasonable likelihood of infrastructure being available (meeting concurrency requirements) should be a requirement before land is included as part of capacity.
4. Neighborhood resistance to increased density in the cities and in the developing suburbs must be factored in as a reality.
5. The specific nature of environmental expectations within the UGA should be clarified. Density/capacity expectations should be adjusted accordingly.

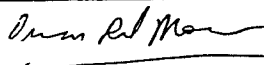
NONE OF THESE FACTORS HAVE BEEN INCLUDED IN THE ANALYSIS TO DATE

THE COSMOS GROUP

- Incorporation in 1986.
- Establishment of headquarters in Bellevue, Washington.
- Portfolio consisting of single- and multi-family housing, mixed-use, retail, and commercial properties:
 - ~ Residential 1,437 Units
 - ~ Retail 34,200 Square Feet
 - ~ Commercial 217,000 Square Feet
 - ~ Industrial 230,000 Square Feet
- Diversified full-service, real estate development company.
 - ~ Acquisition, finance, development, construction, management and sales of each project is accomplished under one roof.
- *The Cosmos Group* entities include:
 - ~ Cosmos International Corp.
 - ~ Cosmos Development & Administration Corp.
 - ~ Cosmos Construction Corp.
 - ~ Cosmos Management Corp.
 - ~ Commerce Properties, Inc.
 - ~ Commerce Financial, Inc.

**Metropolitan King County Council
Growth Management, Housing, Environment Committee
February 9, 1994**

⇒ Oscar Del Moro



- Direct development activities of Cosmos Development & Administration Corp. (Bellevue, WA).
- All my professional training has been focused to deal with *urban environments*.
 - Licensed Architect
 - B.S. in Architecture
 - Master of Architecture and Urban Design
- Support growth management goals and concepts – vital diversified urban centers.
- Environmentalist
 - Stewards of the land for following generations
 - Believe that people and nature are not mutually exclusive
- I do not consider myself an oxymoron, nor am I in the social minority.

⇒ At Cosmos, we have been engaged in building "Growth Management" projects before such activity became mainstream chic.

(Pass out handout.)

- Since 1986 (inception) we have completed, managed, or are in the process of building:

• Residential	1,437 Units
• Retail	34,200 Square Feet
• Commercial	217,000 Square Feet
• Industrial	230,000 Square Feet
- 95% of our projects are mixed-use in nature
- 100% of them are in urban areas
 - City Limits: Seattle, Bellevue, Renton
 - ***** 0% of them are in unincorporated King County *****

⇒ I'm here today because our community is at a cross road and needs balanced input from all sides.

- Those of use who build the homes, the work places, the community centers, the recreational areas, as well as contribute to the quality of life – are on the verge of extinction.
- This committee is encharged with formulating Growth Management, Housing, Environment policy for generations to come.

⇒ Environmental sepa / reactionism process.

- Well intentioned concept who's time came and went.
- Singularly most undemocratic, unscientific, unpredictable, unaccountable process that terrorizes and conditions projects to death.
- Sepa / defaulted planning, zoning, and environmental policy formulation to the individual project level.
- Projects have become policy battlefields and beaurocratic delays the weapon of choice for project termination or conditioning.

- The beauty / irony of all this that the applicant is expected to fund his own demise.

• No one on all sides is happy with SEPA.

- Policy makers fight policy makers
- Citizens are pitted against citizen
- Citizens against cities
- Cities against developers
- Developers against developers
- Man against God
- Paraphrase old military saying:
We have met the enemy and they are us!

⇒ As a company, we have spent millions in unnecessary studies, delays, mitigation, court challenges, and self defense. Cost of doing business is too high, none of which were environmentally oriented.

- Each Project / Common Thread

- Appealed or threat of appeal after jurisdictional approval / conditioning completed.
- Except for the last two projects (Jackson Court / Madison Estates), each was settled with *private mitigation* for personal impact compensation.
- N I M B Y !!
- These projects are examples of what growth management will require. Yet we have had to fight or *buy* their survival!

⇒ Growth Management

- Breath of hope in a system that has lost its relevancy.
 - Policies are being developed to manage growth to stimulate and channel it for the common good.
- Growth Management has a terrible Achilles heal – needs protecting.
 - Clear implementation with accountability.
 - Needs to replace all that which was before.
 - Cannot be another layer of beaurocratic process for projects to muddle through. Policy war on the back of a project is unacceptable.
 - Allow us to be in the business of building and meeting market demands. All markets – low, middle, and upper.
 - Remove the yolk of satisfying the supra majority of the lone individual with the power to destroy a project and circumvent democracy.
 - Do not club us into submission. We are not your enemies. A balanced carrot and stick approach must be used. Incentives, trade-offs, options, creative interpretations should be the rules of our partnership. *We do have common goals.* (Density.)
 - Be careful how you draw lines in the sand. Supply and demand can be the brutalist of adversaries (10 lbs in a 5 lb bag).
 - Presently set up for failure.
 - Affordability will never have a chance if you do not allow for enough room to meet projections.

- Be careful how you are tinkering with lifestyles and expectations.
 - I build in the cities, but I live in the country. Choice of lifestyle is a fundamental ingredient in the American dream.

In Closing

- ⇒ We that are here – are survivors of the over-processed and over-leveraged 80's.
 - We have forced ourselves to restructure and re-think how we do business.
 - We are lean
 - Highly competitive
 - Creative
 - Ironically it is now your turn to go through the test of fire that has changed us so.
 - The unfolding drama of growth management and how it will be dealt with by the counties is being evaluated very carefully.
 - Whether you wish it or not, you will be required to compete for your tax base.
 - Business and industry is becoming increasingly mobile.
 - Its reliance on place weakens with every new technology and trade agreement.
 - Its psychological commitment to place is tested with each impact fee and regulatory nightmare.
 - In our strategy sessions, options are being evaluated to follow the evolving market and respond to it, where ever it relocates.
 - Like a raft in rapids, we are pushed by reality currents.
- ⇒ Over the years we as a community have gained much knowledge, but have practiced very little wisdom. Opportunities to change ourselves and bring balance to our actions is very rare. Growth Management and this committee represents such a rare moment.
- ⇒ For the sake of all that we have – and all that we wish to become – I hope you have the foresight to see reality as it is, and find the courage and wisdom to make the right choices.

Thank you.

- New Construction High-Rise
- 240 Residential Units
- 9,000 SF Retail Space



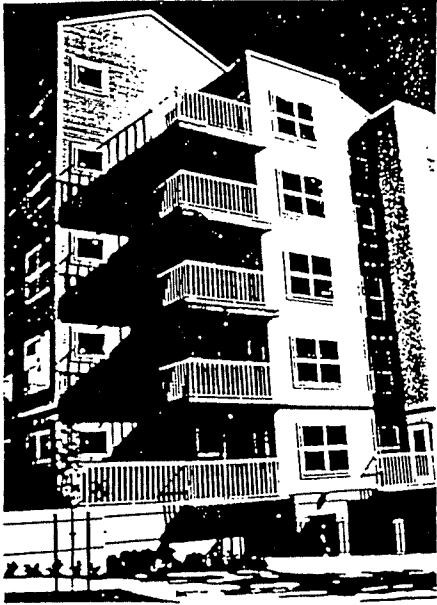
Seattle Heights

- New Construction High-Rise
- 171 Residential Units
- 12,000 SF Retail Space
- 85,000 SF Commercial Space



BELLEVUE PACIFIC CENTER

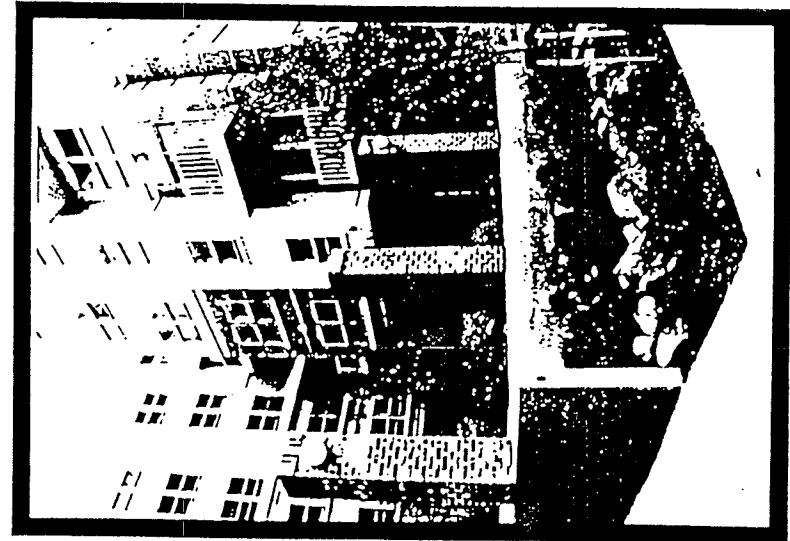
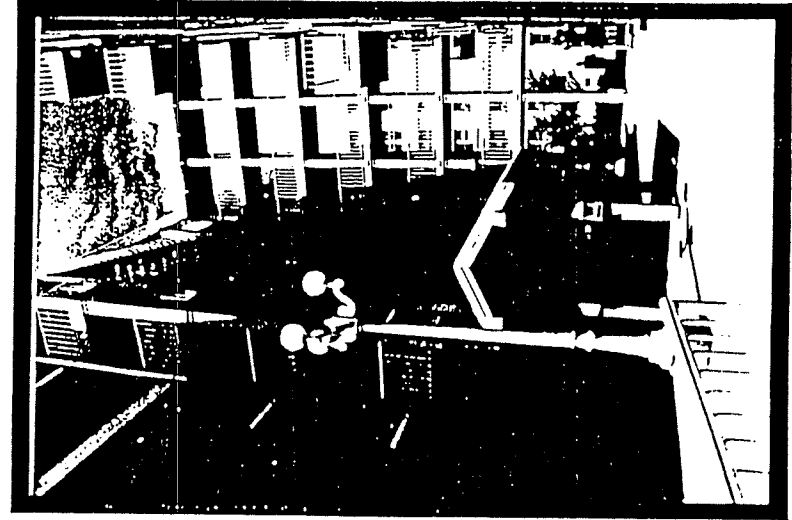
COSMOS



- New Construction Mid-Rise
- 184 Residential Units
- 4,000 SF Retail Space

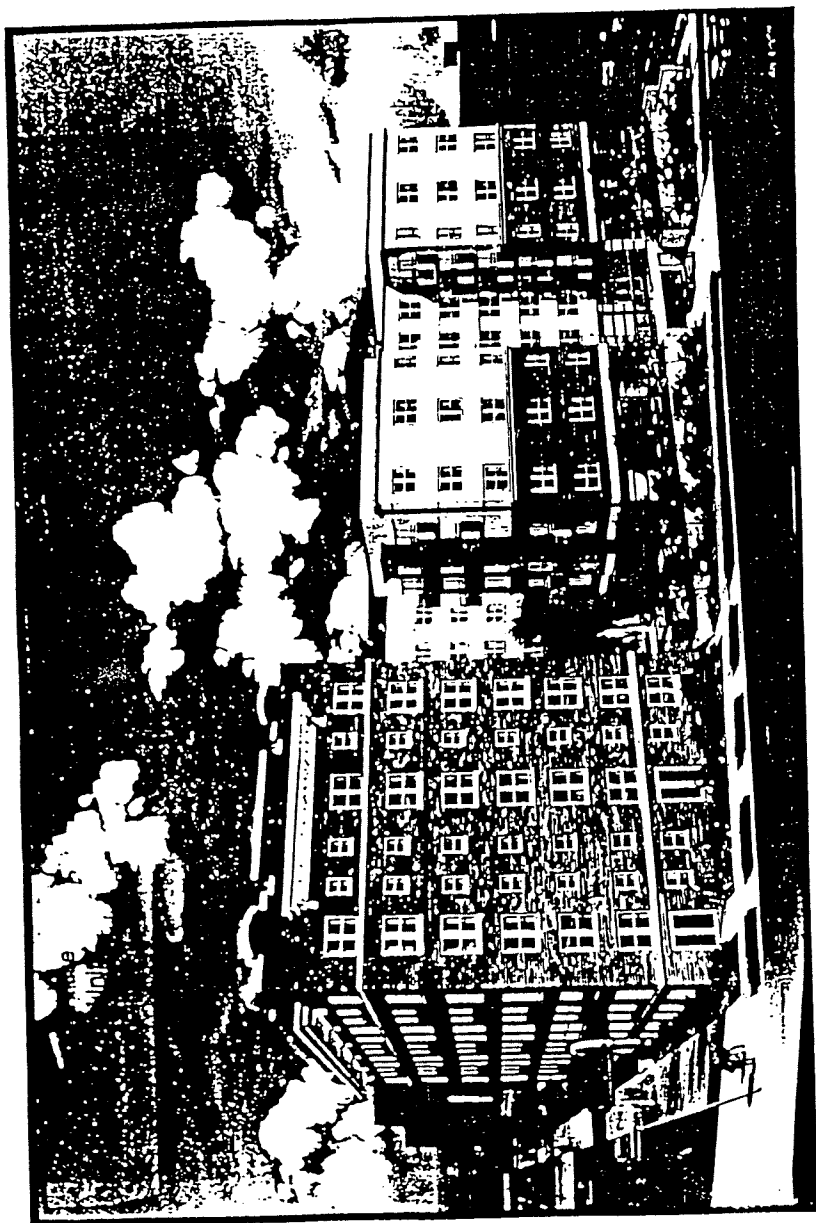


Linden Square Apartments



Ambassador II Condominiums

- New Construction Mid-Rise



Ambassador I & II

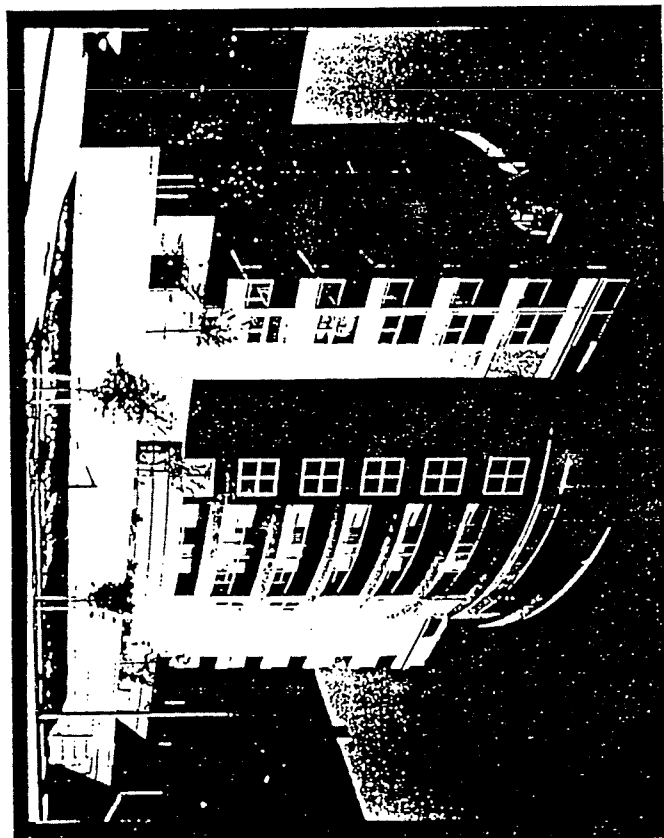


Hayes Court Apartments

- Mid-Rise
- 50 Residential Units
- 2,000 SF Retail



Wilson Court Apartments



Jackson Court Apartments

- Mid-Rise
- 53 Residential Units

COMMENTS ON DRAFT SEIS

1. The whole CPP concept depends on key assumptions regarding the true capacity numbers, but the capacity discussion is inadequate and incorrect. There is no explanation of the basis for the recommendation of a 25% "cushion" for the capacity numbers. There is no discussion of the effects of under or over-estimating the need.

The SEIS is under-estimating for several reasons.. Most of the good developable land has been used and the environmental, political, neighborhood and market factors will require far greater discounts than the ones being assumed. Also, there will not be adequate public funds to provide the infrastructure needed for many urban sites. Even infill sites will require large expenditures, especially in light of existing deficits in many areas.

A logical question then is: what do we have to lose if we had even a 75% cushion to cover these uncertainties? With today's concurrency requirements and impact fees, there is little to be feared from an over capacity - other than having too much affordable housing for our people. On the other hand, the literature is full of evidence that too little capacity increases the cost of housing and the amount of homelessness.

2. It is assumed, with no evidence or explanation, that without extreme governmental intervention in the market through the CPP's we will have a continuation of the low density development patterns of the 1980's. This assumption is illogical and ignores the evidence of new trends in the 1990's. It is like driving by looking in the rear view mirror. It also ignores the fundamental nature of the development process: the pattern of development is not the result of the whim of builders. Rather, it is a function of the market (i.e. what people want) and of governmental regulations.

As land prices have skyrocketed due to downzoning, the SAO and other governmental regulations, the market has changed. Most people can no longer afford the size of lots and homes built in the 80's. As a result, builders have gone to smaller lots and houses and are trying to reduce the size of roads and other improvements. Even a cursory review of industry publications or proposed new projects will substantiate that building for higher densities is the theme for the 90's.

At the same time, the new county zoning code has dramatically changed the rules and now encourages higher densities. Most cities are going in the same direction. There will be further pressure to increase densities as people are having to buy farther out and commute long distances to work. New approaches to transportation planning and infrastructure, together with laws such as the Commuter Trip Reduction Act, concurrency requirements of GMA and the ISTEA will all encourage higher densities closer to employment and transportation corridors.

3. Therefore, we need to analyze the likely alternative development pattern [under Alternatives A or E.] It will have much more density, mixed uses and clusters along existing transportation corridors. In short, it will be much different than in the 80's and will continue to change in this direction. True, it will not reach overnight the drastic changes sought in the CPP's, but then neither will the CPP's. The entire analysis of impacts of the CPP's depends upon the assumption that merely mandating certain types of housing patterns, affordable housing and employment growth will work. Yet the SEIS on p. 128 specifically disclaims any analysis of the two most important issues supporting this assumption: the ability of public finances to deal with growth (fiscal impact analysis) and the economic feasibility of the alternatives and their inherent policies. The SEIS is useless unless you are willing to accept the answers to these questions solely on blind faith. Shouldn't we take the time to analyze and reach agreement on these issues before we spend the time and money to construct an entire plan for this region?

4. The SEIS assumes that there will be no significant effect on the economy of King County by any of the alternatives. Apparently no one has bothered to ask Boeing or other major employers what they think about this assumption.

What about the problem that we may drive business to other areas? No problem, the SEIS just assumes this issue away: "Policies which are perceived to direct economic development to other areas may be mitigated by other counties having similar economic development policies," p. 130. This assumption is dubious and ignores the option of moving to other parts of Washington or to other areas, such as Wichita.

How about driving housing to other areas? It acknowledges that the industry has made this argument, but it just assumes the problem away: "this is uncertain and will depend, in large part, on the policies adopted in those counties and on the degree of cooperation" by surrounding counties," p. 65. It then totally disregards the empirical data from 1991 to 1993, including numerous industry and media reports, and says only that the 1984 to 1990 baseline data is "inconclusive" on this trend.

How does the SEIS explain why there will be no regional impact? Again, by the assumption in this curious non sequitur: "The focus of VISION 2020 is on managing regional growth, rather than on attempting to control the overall amount of growth or its timing. As a result, no alternative under VISION 2020 is expected to significantly affect the region's economy," p. 130.

5. The entire discussion of compact development on pp. 64 - 65 is strained and obviously skewed to support a predetermined conclusion. We deserve a more rigorous analysis and review of the literature. General statements such as "all of these impacts can be mitigated to some extent" are totally useless.

One major assumption, that the long-term public and private costs of serving new development will be less in dense urban centers, has no supporting data. It simply says: "Although the research literature suggests that this is a complex issue, there is a substantial body of work which suggests that the per unit costs of serving new growth are lessened at higher densities," p. 64. This ignores the issues of curing existing deficits (e.g. roads, parks, public safety and schools) in dense urban areas. It also ignores the extra cost of different construction techniques and of retrofitting existing facilities such as roads and sewers rather than building new ones. It is irresponsible to push a plan without first getting a better understanding of these key numbers.

6. The discussion of affordable housing disregards the numerous studies [I can gladly give them a list to review] that have looked at this issue locally and nationally and ignores the lesson we learned in "Econ 101": although costs will set a minimum, price is essentially a function of supply and demand. Surely no one on this task force seriously disputes this formulation [if so, we should get that resolved now.]

Nevertheless, the SEIS ignores supply and only talks about demand: "market forces, such as increases in employment and population, are the principal factors which drive prices up in any growing region." This is absurd because the key factor is not growth in demand, but the balance between supply and demand. This entire discussion is flawed by this basic misunderstanding and it therefore concludes that we just can't get affordable housing under any of the alternatives because we will have growth. pp. 183 - 184. It further concludes that these "market forces" [i.e. demand only] "are on the order of ten times the impact of housing policies on housing affordability." What about the obvious fact that we can choose to increase the supply? Shouldn't this at least be studied and evaluated even though it may conflict with the philosophy and other beliefs that the GMPC would like to have substantiated?

I had a very limited time to review the draft, but I expect I will have further comments regarding the inconsistencies and errors in the Appendices.

Respectfully Submitted,

Joli Imperatori
Economic & Environmental Balance Council

REAL GROWTH FACTS — KING COUNTY

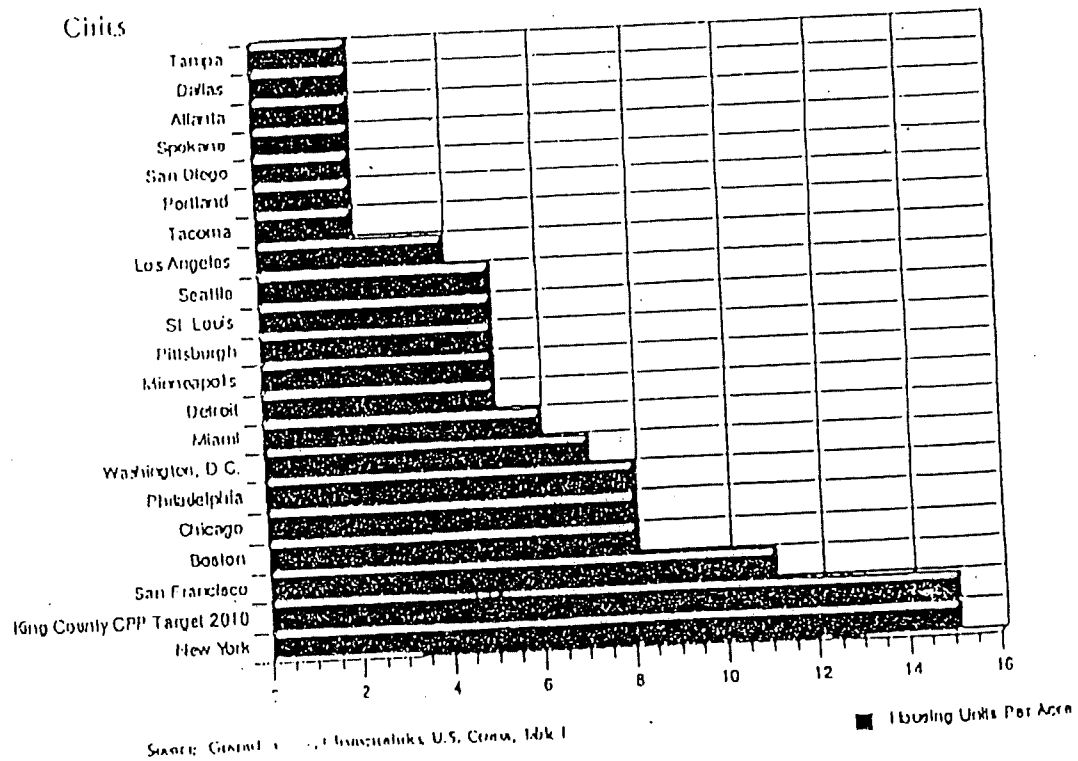
Building Requirements for Urban Centers

CENTERS	Residential Buildings	Office Buildings
Bellevue	22	6
Federal Way	22	3
Kent	11	3
Kirkland	13	2
Redmond CBD	26	3
Overlake	9	2
Renton	27	3
Sea Tac	18	3
Tukwila	13	3
Seattle:		
CBD	43	12
Seattle Centre	8	2
First/Capitol Hill	21	3
U District	10	1
Northgate	17	3

Assumptions:

1. Residential - 10 units per floor. Tower Height: Seame CBD=30 stories, Bellevue=24 stories, other Seattle Centers=22 stories, all other centers=20 stories.
2. Office - 100 employees per floor. Tower Height: Seame CBD=35 stories, Bellevue=27 stories, other Seattle Centers=22 stories, all other centers=20 stories.

1990 CENSUS City Housing Densities



APPENDIX

Tables

1. Revised Discounted Dwelling Unit Capacity on Land Zoned For Residential Use
2. Proposed Growth Target Ranges for Households and Employment
3. Initial Proposed Growth Target Ranges for Households with Discounted Dwelling Unit Capacity Comparison
4. King County Population Change
- 4B. King County
5. Comparisons: Proposed Urban Centers Vs. Quantitative Policy Criteria (Households)
6. Comparisons: Proposed Urban Centers Vs. Quantitative Policy Criteria (Jobs)
7. Recorded Formal Subdivisions in King County, 1985-1992 - Lots, Acres, and Average Density per Gross Acre
- 8A. Parcel Sizes and Distribution - King County "Old" Rural Areas, June, 1992
- 8B. Parcel Sizes and Distribution - King County "New" Rural Areas, May, 1992
9. Annual Average Home Price in King, Pierce and Snohomish Counties, 1987 - 1993
10. Not Used.
11. Not Used.
12. Impacts of Policy Options for Rural Character on Both the Centers Alternatives and the Magnet Alternative

Figures

1. Residential Lands - Non Center Urban Area
2. Employment Lands - Non Center Urban Area
3. King County Single Family and Multifamily Trends
4. King County Housing Densities 1993 - 2013

Map Series (4 of 4): GMPC Proposed Urban Growth Boundary

Photo Montage: Urban Center Housing Choices

Table 1
Revised Discounted Dwelling Unit Capacity on Land Zoned For Residential Use

Jurisdiction CITIES	Existing Units	Capacity on Vacant Land	Redevelop Capacity	Total New Capacity	Revised Total Capacity
Algona	624	493	NA	493	493
Auburn	13,627	10,218	3,751	13,969	13,969
Beaux Arts	115	0	NA	0	0
Bellevue	37,334	4,201	15,269	19,470	19,470
Bl Diamond	574	974	NA	974	974
Bothell (KC part)	5,151	2,498	1,026	3,524	3,524
Carnation	431	122	56	178	483 ♦
Clyde Hill	1,079	8	0	8	8
Des Moines	6,650	916	1,453	2,369	2,369
Duvall	985	663	198	861	2,415 ♦
Enumclaw	3,034	1,119	NA	1,119	2,534 ♦
Fedl Way	28,919	8,206	3,178	11,384	36,575 *
Hunts Pt	185	5	0	5	5
Issaquah	3,564	2,693	567	3,260	3,260
Kent	18,585	4,198	5,796	9,994	9,994
Kirkland	19,030	1,966	3,399	5,365	9,423 *
Lk Forest Pk	1,046	81	146	227	227
Medina	1,164	17	0	17	19 *
Mercer Isl	8,424	585	NA	585	1,250 *
Milton	264	69	0	69	69
Normandy Pk	2,365	263	506	769	769
North Bend	957	843	NA	843	2,355 ♦
Pacific	1,603	1,162	NA	1,162	1,162
Redmond	16,818	3,385	1,409	4,794	16,100 *
Renton	19,576	1,350	2,310	3,660	13,000 *
SeaTac	10,110	1,137	6,476	7,613	17,490 *
Seattle	249,622	34,546	61,395	95,941	113,640 *
Skykomish	145	45	0	45	45
Snoqualmie	610	2,813	0	2,813	4,577 ♦
Tukwila	6,375	2,069	899	2,968	6,000 *
Yarrow Pt	373	18	0	18	18
Subtotals	459,339	86,663	107,834	194,497	282,217
Unincorp Plng Areas (Urban Designated Within 30 Year Line)					
Bear Creek	6,800	7,020	0	7,020	2,610 *
East Samm	10,900	8,280	2,240	10,520	11,700 *
Eastside	600	138	698	836	836
Federal Way	11,200	4,806	1,990	6,796	6,796
Gr River Val	1,050	167	15	182	182
Highline	33,600	7,439	6,581	14,020	14,020
Newcastle	16,700	4,950	2,560	7,510	7,510
Northshore	24,500	6,030	4,640	10,670	10,670
Shoreline	24,000	2,156	3,824	5,980	5,980
Soos Creek	33,400	12,272	4,970	17,242	17,242
Tahoma Rav Hts	12,100	7,200	2,000	9,200	9,200
Subtotals	174,850	60,458	29,518	89,976	86,746
Unincorp. Rural Areas					
Rural Before 7/92	19,000	16,142	2,532	18,674	18,674
Rural Added 7/92	13,000	9,180	1,440	10,620	10,620
City Expansion Areas	1,000	5,568	982	6,550	NA
Subtotals	33,000	30,890	4,954	35,844	29,294
GRAND TOTAL	667,189	178,011	142,306	320,317	398,257

capmap4.wk3/05-10-94

Source: King County Data Resources Technical Forum, 1994.

Notes: Dwelling unit capacity is discounted for critical areas, right of way, other public purpose lands, and market factors, as explained in the Draft SEIS for the Countywide Planning Policies. Redmond, Renton, Seattle, and Tukwila applied their own discounts to market factors. New numbers for revised comprehensive plans have been received from the starred jurisdictions (*). Table assumes current boundaries except for Carnation, Duvall, Enumclaw, North Bend, and Snoqualmie, which assume expansion areas in adopted Community Plans. Rural city expansion areas, per adopted community plans and county staff estimates, are included with their respective cities (♦). Changes which might come from ongoing interjurisdictional negotiations with rural cities are not reflected in the Table.

Proposed Growth Target Ranges for Households and Employment

HH&EMP-3.wk3

CITIES	Net New Households	Net New Hhld Ranges		Net New Employment	Net New Emp. Ranges	
		Low	High		Low	High
Algona	450	386	514	350	300	400
Auburn	9,000	7,297	10,703	11,100	9,000	13,200
Beaux Arts	0	0	0	0	0	0
Bellevue	9,550	8,553	10,547	28,250	25,300	31,200
Black Diamond	1,150	1,054	1,246	1,200	1,100	1,300
Bothell (KC part)	2,150	1,613	2,688	2,900	2,150	3,600
Burien	2,000	1,778	2,222	450	400	500
Carnation	450	450	450	0	0	0
Clyde Hill	13	13	13	0	0	0
Des Moines	2,000	1,600	2,400	2,500	2,000	3,000
Duvall	1,850	1,741	1,959	1,700	1,600	1,800
Enumclaw	2,700	2,430	2,970	1,000	900	1,100
Federal Way	16,700	14,951	18,449	14,800	13,300	16,400
Hunts Point	5	5	5	0	0	0
Issaquah	3,000	2,093	3,907	4,300	3,000	5,600
Kent	7,500	6,815	8,185	11,500	10,450	12,550
Kirkland	6,500	5,933	7,067	8,600	7,800	9,300
Lake Forest Park	150	113	188	200	150	250
Medina	19	19	19	0	0	0
Mercer Island	1,250	1,176	1,324	1,700	1,600	1,800
Milton	20	20	20	0	0	0
Normandy Park	150	150	150	0	0	0
North Bend	1,700	1,410	1,990	2,050	1,700	2,400
Pacific	1,350	675	2,025	100	50	150
Redmond	11,530	10,732	12,328	32,500	30,250	34,750
Renton	9,900	8,609	11,191	23,000	20,000	26,000
SeaTac	4,000	3,949	4,051	15,800	15,600	16,000
Seattle	60,000	53,715	66,285	132,700	118,800	146,600
Skykomish	30	30	30	0	0	0
Snoqualmie	3,100	2,163	4,037	4,500	3,100	5,820
Tukwila	6,000	5,302	6,698	21,500	19,000	24,000
Woodinville	2,000	1,949	2,051	1,950	1,900	2,000
Yarrow Point	20	20	20	0	0	0
City Totals	166,237	146,744	185,730	324,650	289,450	359,720
Uninc. KC	50,000	44,600	54,000	25,000	23,300	28,700
GRAND TOTAL	216,237	191,344	239,730	349,650	312,750	388,420

Source: Centers, Population and Employment Subcommittee of the Liaison Group, May 1994.

Table 3

Initial Proposed Growth Target Ranges for Households with Discounted Dwelling Unit Capacity Comparison

CITIES	Net New Household Target Ranges		Net New Households Midpoint	Revised Discounted DU Capacity	Excess DU Capacity	
	Low	High			#	% Over Midpoint
Algona	386	514	450	493	43	10%
Auburn	7,297	10,703	9,000	13,969	4,969	55%
Beaux Arts	0	0	0	0	0	0%
Bellevue	8,553	10,547	9,550	19,470	9,920	104%
Black Diamond	1,054	1,246	1,150	974	(176)	-15%
Bothell (KC part)	1,613	2,688	2,150	3,524	1,374	64%
Burien	1,778	2,222	2000	NA	NA	NA
Carnation	450	450	450	483 ♦	33	7%
Clyde Hill	13	13	13	8	(5)	-38%
Des Moines	1,600	2,400	2,000	2,369	369	18%
Duvall	1,741	1,959	1,850	2,415 ♦	565	31%
Enumclaw	2,430	2,970	2,700	2,534 ♦	(166)	-6%
Federal Way	14,951	18,449	16,700	36,575 *	19,875	119%
Hunts Point	5	5	5	5	0	0%
Issaquah	2,093	3,050	2,572	3,260	688	27%
Kent	6,815	8,185	7,500	9,994	2,494	33%
Kirkland	5,933	7,067	6,500	9,423 *	2,923	45%
Lake Forest Park	113	188	150	227	77	51%
Medina	19	19	19	19 *	0	0%
Mercer Island	1,176	1,324	1,250	1,250 *	0	0%
Milton	20	20	20	69	49	245%
Normandy Park	150	150	150	769	619	413%
North Bend	1,410	1,990	1,700	2,355 ♦	655	39%
Pacific	675	2,025	1,350	1,162	(188)	-14%
Redmond	10,732	12,328	11,530	16,100 *	4,570	40%
Renton	8,609	11,191	9,900	13,000 *	3,100	31%
SeaTac	3,900	7,500	5,700	17,490 *	11,790	207%
Seattle	53,715	66,285	60,000	113,640 *	53,640	89%
Skykomish	30	30	30	45	15	50%
Snoqualmie	2,163	4,037	3,100	4,577 ♦	1,477	48%
Tukwila	5,302	6,698	6,000	6,000 *	0	0%
Woodinville	1,949	2,051	2000	NA	NA	NA
Yarrow Point	20	20	20	18	(2)	-10%
City Totals	146,744	185,730	166,237	282,217	115,980	70%
Uninc. King County	44,600	54,000	50,000	116,040 *	66,040	132%
GRAND TOTAL	191,344	239,730	216,237	398,257	182,020	84%

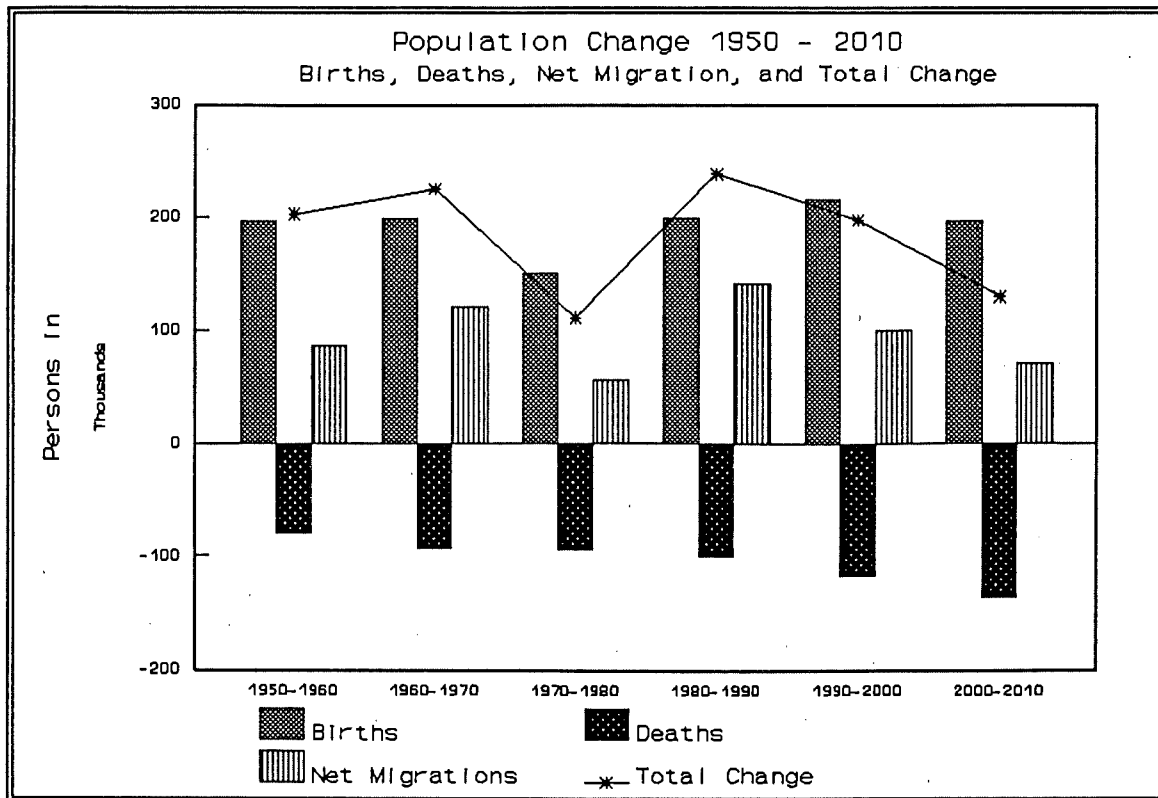
CAPMAP6.WK3/NN

Source: King County Data Resources Technical Forum, 1994, for Capacity. Centers, Population and Employment Subcommittee of the Liaison Group, 1994, for net new household targets.

Notes: Dwelling unit capacity is discounted for critical areas, right of way, other public purpose lands, and market factors, as explained in the Draft SEIS for the Countywide Planning Policies. Redmond, Renton, Seattle, and Tukwila applied the own discounts for market factors. New capacity numbers for the revised comprehensive plans have been received from the starred jurisdictions (*). Table assumes current boundaries except for Carnation, Duvall, Enumclaw, North Bend, and Snoqualmie, which assume expansion areas in adopted Community Plans. Rural city expansion areas, per adopted community plans and county staff estimates, are included with their respective cities (♦). Changes which might come from ongoing interjurisdictional negotiations with Rural cities are not reflected in the Table.

Table 4 A

King County Population Change



Decade	Initial Population	Period Births	Period Deaths	Period Net Mig	Period Change	Terminal Population
1950-1960	732,992	195,648	-79,897	86,271	202,022	935,014
1960-1970	935,014	197,976	-93,315	119,694	224,355	1,159,369
1970-1980	1,159,369	149,515	-94,646	55,511	110,380	1,269,749
1980-1990	1,269,749	197,768	-101,032	140,834	237,570	1,507,319
1990-2000	1,507,319	215,441	-118,258	100,000	197,183	1,704,502
2000-2010	1,704,502	195,696	-137,067	70,001	128,630	1,833,133
2012 Total Population Forecast: 1,857,618						

Source: Office of Financial Management, Forecasting Division: 1-17-92

Table 4 B

King County

Population				Components of Change			
Year	Total	Male	Female	Period	Births	Deaths	Net Migration
1990	1,507,319	742,676	764,643				
1995	1,621,337	800,015	821,322	1990-1995	111,554	56,966	59,430
2000	1,704,502	842,318	862,184	1995-2000	103,887	61,292	40,570
2005	1,771,379	876,488	894,891	2000-2005	97,748	65,773	34,901
2010	1,833,133	907,877	925,256	2005-2010	97,948	71,294	35,101
2012	1,857,618						

Age	Total	1990 Male	Female	Total	1995 Male	Female	Total	2000 Male	Female
0-4	106,999	54,391	52,608	113,487	57,846	55,641	105,790	53,931	51,859
5-9	98,593	50,197	48,396	112,024	56,675	55,349	116,626	59,169	57,458
10-14	87,340	44,711	42,629	101,579	51,438	50,141	113,943	57,348	56,595
15-19	88,193	44,560	43,633	91,033	46,420	44,613	104,415	52,627	51,788
20-24	114,345	57,205	57,140	94,807	47,888	46,919	96,663	49,204	47,459
25-29	145,953	74,033	71,920	128,579	64,871	63,708	104,809	53,300	51,510
30-34	154,775	78,269	76,506	156,969	79,114	77,855	135,977	68,531	67,446
35-39	143,612	72,019	71,593	160,167	80,385	79,782	160,056	80,434	79,622
40-44	125,483	62,598	62,885	145,414	73,198	72,216	160,533	80,639	79,894
45-49	93,333	46,991	46,342	124,984	62,293	62,691	144,489	72,706	71,783
50-54	68,609	34,797	33,812	92,560	46,747	45,813	123,169	61,540	61,629
55-59	58,653	29,250	29,403	65,972	33,287	32,685	88,899	44,650	44,249
60-64	55,475	26,405	29,070	54,670	26,725	27,945	61,456	30,483	30,973
65-69	54,403	24,574	29,829	50,304	23,233	27,071	49,652	23,640	26,013
70-74	42,785	18,734	24,051	48,016	20,712	27,303	44,424	19,684	24,740
75-79	31,633	12,515	19,118	35,699	14,559	21,140	40,331	16,314	24,018
80-84	20,349	7,068	13,281	24,410	8,785	15,626	27,720	10,385	17,336
85+	16,786	4,359	12,427	20,655	5,835	14,820	25,543	7,734	17,810
Total	1,507,319	742,676	764,643	1,621,337	800,015	821,322	1,704,502	842,318	862,184
Mdn Age	33.63	32.95	34.31	35.38	34.73	36.03	37.31	36.68	37.95

Age	Total	2005 Male	Female	Total	2010 Male	Female
0-4	99,472	50,715	48,757	99,684	50,820	48,864
5-9	108,437	55,033	53,404	101,952	51,736	50,216
10-14	118,345	59,745	58,600	110,089	55,591	54,498
15-19	116,829	58,564	58,265	121,274	60,972	60,302
20-24	110,362	55,544	54,818	123,475	61,836	61,639
25-29	105,955	54,340	51,615	120,802	61,258	59,544
30-34	110,354	56,056	54,298	111,517	57,144	54,373
35-39	138,619	69,664	68,955	112,408	56,932	55,476
40-44	160,203	80,587	79,616	139,008	69,959	69,049
45-49	159,398	80,033	79,365	159,288	80,095	79,193
50-54	142,268	71,778	70,490	157,153	79,110	78,043
55-59	118,312	58,802	59,510	136,839	68,711	68,128
60-64	83,006	41,013	41,992	110,701	54,147	56,554
65-69	55,967	27,094	28,873	75,870	36,616	39,254
70-74	44,003	20,173	23,830	49,807	23,276	26,531
75-79	37,524	15,683	21,840	37,325	16,207	21,117
80-84	31,617	11,820	19,797	29,595	11,505	18,090
85+	30,708	9,842	20,865	36,353	11,965	24,388
Total	1,771,379	876,488	894,891	1,833,133	907,877	925,256
Mdn Age	39.18	38.46	39.91	40.55	39.79	41.28

Note: Age-sex detail may not add due to adjustment and rounding.
 OFFICE OF FINANCIAL MANAGEMENT, Forecasting Division: 1/17/1992

Table 5

COMPARISONS: PROPOSED URBAN CENTERS VS. QUANTITATIVE POLICY CRITERIA

CENTERS	SIZE (ACRES)	H O U S E H O L D S					
		Policy Criteria	Existing HHLD	Midpoint of 20 Year Target Range	Additional HHLD Needed Beyond 20 Years	2010 Density	New DU Capacity in Revised Plans
Bellevue CBD	409	6,135	835	5,300	0	15	11,500
Federal Way CBD	271	4,065	400	4,300	0	17	34,300
Kent CBD	305	4,575	339	2,250	1,986	8	2,900
Kirkland Totem Lake	300	4,500	1,173	1,450	1,877	9	3,900
Redmond Centers:							
CBD	466	6,990	1,025	5,175	790	13	8,200
Overlake	941	14,115	4,613	1,715	7,787	7	6,100
Renton CBD	450	6,750	940	5,400	410	14	7,400
SeaTac CBD	930	13,950	2,800	3,500	7,650	7	14,200
Seattle Centers:							
CBD	945	14,175	7,421	14,700	0	23	23,500
Seattle Centre	479	7,185	5,535	1,650	0	15	2,000
First Hill/Capitol H.	910	13,650	19,773	5,540	0	28	8,400
U. District	780	11,700	11,675	2,110	0	18	2,800
Northgate	416	6,240	3,355	3,000	0	15	4,500
Tukwila CBD	640	9,600	3	1,300	8,097	2	1,400
TOTALS:	8,242	123,630	59,887	57,390	28,597	14	131,100

Documentation:

Policy Criteria = Acres x 15 Hhld/acre.

Additional Hhld needed = Policy Criteria minus existing Hhld minus 20 year target.

Countywide Hhld Target = 216,200

2010 Density = Hhlds per Gross Acre

Capacity in revised plans discounted 20% for market factors, as explained in Table 2 of DSEIS.

Redmond, Renton, Seattle, and Tukwila applied their own market discounts.

57,390 = 27% of 20 Year Target

Table 6

COMPARISONS: PROPOSED URBAN CENTERS VS. QUANTITATIVE POLICY CRITERIA

CENTERS	SIZE (ACRES)	J O B S					
		Policy Criteria	Existing Jobs	Midpoint of 20 Year Target Range	Additional Jobs Needed Beyond 20 Years	2010 Density	New Jobs Capacity in Revised Plans
Bellevue CBD	409	20,450	23,200	17,500	none	100	40,000
Federal Way CBD	271	13,550	6,000	6,300	1,250	45	39,300
Kent CBD	305	15,250	1,987	5,600	7,663	25	9,900
Kirkland Totem Lake	300	15,000	3,183	2,500	9,317	19	11,400
Redmond Centers:							
CBD	466	23,300	5,294	6,500	11,506	25	22,600
Overlake	941	47,050	20,100	17,000	9,950	39	16,700
Renton CBD	450	22,500	22,700	5,200	none	62	6,000
SeaTac CBD	930	46,500	21,900	15,500	9,100	40	95,200
Seattle Centers:							
CBD	945	47,250	145,119	62,700	none	220	82,000
Seattle Centre	479	23,950	20,578	3,300	none	50	17,000
First Hill/Capitol H.	910	45,500	43,393	11,700	none	61	18,000
U. District	780	39,000	61,550	8,500	none	90	15,000
Northgate	416	20,800	11,366	9,300	none	50	10,000
Tukwila CBD	640	32,000	11,000	10,000	11,000	33	33,000
TOTALS:	8,242	412,100	397,370	181,600	59,786	70	416,100

Documentation:

Policy Criteria = Acres x 50 jobs/acre.

Additional jobs needed = Policy Criteria minus existing jobs minus 20 year target.

Countywide Jobs Target = 349,600

2010 Density = Jobs per Gross Acre

Capacity in revised plans discounted 20% for market factors, as explained in Table 3 of DSEIS.

Redmond (Overlake), Renton, and Seattle applied their own market discounts.

181,600 = 52% of 20 Year Target
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Table 7

Recorded Formal Subdivisions in King County, 1985 – 1992
Lots, Acres, and Average Density per Gross Acre

King County Cities	1985		1986		1987		1988		1989		1990		1991		1992		8 YEAR TOTAL		
	Lots	Acres	Lots	Acres	Lots	Acres	Lots	Acres	Lots	Acres	Lots	Acres	Lots	Acres	Lots	Acres	Lots	Acres	DU/ACRE
Algona	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00
Auburn	118	36.46	13	2.74	6	1.10	47	14.88	81	19.23	76	103.52	0	0.00	51	10.83	392	188.76	2.08
Beaux Arts	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00
Bellevue	94	33.23	138	40.77	339	77.78	167	72.83	68	46.73	249	90.94	313	235.83	21	5.78	1389	603.89	2.30
Black Diamond	11	3.25	0	0.00	0	0.00	0	0.00	30	6.36	0	0.00	0	0.00	87	25.57	128	35.18	3.64
Bothell	65	315.39	135	43.41	119	38.13	170	75.94	162	65.15	169	82.31	35	10.67	6	1.71	861	632.71	1.36
Carnation	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	37	48.62	0	0.00	0	0.00	37	48.62	0.76
Clyde Hill	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00
Des Moines	10	2.05	9	1.90	32	7.25	0	0.00	7	2.36	16	2.92	36	8.66	0	0.00	110	25.14	4.38
Duvall	55	21.90	22	8.60	62	22.66	102	32.45	133	55.94	25	10.75	74	32.49	79	31.57	552	216.36	2.55
Enumclaw	32	9.65	0	0.00	0	0.00	0	0.00	327	92.49	329	86.98	16	4.88	85	49.65	789	243.65	3.24
Federal Way	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	85	27.36	330	142.47	9	17.80	424	187.63	2.26
Hunts Point	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00
Issaquah	100	29.28	29	15.98	0	0.00	0	0.00	31	138.00	0	0.00	27	26.23	30	14.49	217	223.98	0.97
Kent	0	0.00	39	48.02	9	50.23	2	2.41	25	6.36	75	21.86	109	123.79	52	16.78	311	269.45	1.15
Kirkland	37	5.62	84	22.36	47	8.36	102	26.97	79	16.90	70	22.10	0	0.00	13	2.72	432	105.03	4.11
Lake Forest Pk	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00
Medina	0	0.00	2	1.03	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	2	1.03	1.94
Mercer Island	100	39.46	0	0.00	0	0.00	6	1.70	0	0.00	13	3.09	10	6.51	0	0.00	129	50.76	2.54
Milton	28	13.76	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	35	18.90	0	0.00	63	32.66	1.93
Muckleshoot	NA	NA	NA	NA	NA	NA	0	0.00	5	64.13	0	0.00	0	0.00	0	0.00	5	64.13	0.08
Normandy Park	21	7.84	0	0.00	61	15.59	0	0.00	6	3.61	0	0.00	0	0.00	0	0.00	88	27.04	3.25
North Bend	0	0.00	0	0.00	0	0.00	0	0.00	63	28.32	0	0.00	0	0.00	50	10.00	113	38.32	2.95
Pacific	17	4.28	36	6.25	0	0.00	90	23.40	122	33.27	0	0.00	0	0.00	42	12.28	307	79.48	3.86
Redmond	144	49.01	60	83.99	135	38.48	35	10.25	280	85.50	63	25.55	107	47.07	47	35.96	871	375.81	2.32
Renton	20	14.50	0	0.00	84	37.50	105	25.30	71	53.92	124	35.76	37	8.83	8	2.01	449	177.82	2.53
Sea-Tac	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0	0.00	0	0.00	39	9.78	39	9.78	3.99
Seattle	6	0.68	43	10.36	0	0.00	0	0.00	0	0.00	12	3.78	0	0.00	0	0.00	61	14.82	4.12
Skykomish	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00
Snoqualmie	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00
Tukwila	0	0.00	0	0.00	36	11.89	0	0.00	6	36.39	0	0.00	17	3.93	0	0.00	59	52.21	1.13
Yarrow Point	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00
Incorporated Total:	858	586.36	610	285.41	930	308.97	826	286.13	1,496	754.66	1,343	565.54	1,146	670.26	619	246.93	7,828	3,704.26	2.11
Avg. Density per Gross Acre*	1.46 DU/Acre		2.14 DU/Acre		3.01 DU/Acre		2.89 DU/Acre		1.98 DU/Acre		2.37 DU/Acre		1.71 DU/Acre		2.51 DU/Acre				
Unincorporated Total:	3,374	1,587.03	2,395	1,278.56	2,454	1,414.88	3,323	1,654.12	3,779	2,052.41	2,652	1,689.78	2,575	1,571.13	1,579	1,102.60	22,131	12,350.51	1.79
Avg. Density per Gross Acre*	2.13 DU/Acre		1.87 DU/Acre		1.73 DU/Acre		2.01 DU/Acre		1.84 DU/Acre		1.57 DU/Acre		1.64 DU/Acre		1.43 DU/Acre				
Total King County:	4,232	2,173.39	3,005	1,563.97	3,384	1,723.85	4,149	1,940.25	5,275	2,807.07	3,995	2,255.32	3,721	2,241.39	2,198	1,349.53	29,959	16,054.77	1.87
Avg. Density per Gross Acre*	1.95 DU/Acre		1.92 DU/Acre		1.96 DU/Acre		2.14 DU/Acre		1.88 DU/Acre		1.77 DU/Acre		1.66 DU/Acre		1.63 DU/Acre				

* In Dwelling Units per Gross Acre

Source: King County Annual Growth Reports, 1986 – 1993.

Table 8 A

Parcel Sizes and Distribution King County "Old" Rural Areas June, 1992

VACANT LAND

Parcel Size in Acres	# parcels	% of Total	# acres	% of Total
< 2	6,927	51.41%	4,918	6.22%
>= 2 size < 5	3,086	22.90%	10,787	13.64%
>= 5 size < 10	1,849	13.72%	11,986	15.15%
>= 10 size < 15	489	3.63%	5,587	7.06%
>= 15 size < 20	209	1.55%	3,722	4.71%
>= 20 size < 35	483	3.58%	11,621	14.69%
>= 35	431	3.20%	30,470	38.53%
TOTALS:	13,474	100.00%	79,090	100.00%

DEVELOPED LAND

Parcel Size in Acres	# parcels	% of Total	# acres	% of Total
< 2	11,881	64.02%	8,519	15.87%
>= 2 size < 5	3,917	21.11%	13,126	24.45%
>= 5 size < 10	1,962	10.57%	12,921	24.07%
>= 10 size < 15	379	2.04%	4,442	8.27%
>= 15 size < 20	172	0.93%	3,081	5.74%
>= 20 size < 35	142	0.77%	3,494	6.51%
>= 35	104	0.56%	8,109	15.10%
TOTALS:	18,557	100.00%	53,692	100.00%

Sources and Notes: Includes all Rural designated lands in unincorporated King County per the 1985 King County Comprehensive Plan, exclusive of recent Community Plan changes in Bear Creek, Soos Creek, Tahoma/Raven Heights. Taken from the Situs file of the DDES Permits System. Extracted and compiled by King County and Community Development Division, 1992.

Table 8 B

Parcel Sizes and Distribution King County "New" Rural Areas May, 1992

VACANT LAND

Parcel Size in Acres	# parcels	% of Total	# acres	% of Total
< 2	3,034	71.61%	1,921	14.09%
>= 2 size < 5	652	15.39%	2,167	15.89%
>= 5 size < 10	292	6.89%	1,911	14.01%
>= 10 size < 20	130	3.07%	1,756	12.88%
>= 20 size < 35	56	1.32%	1,471	10.79%
> = 35	73	1.72%	4,412	32.35%
TOTALS:	4,237	100.00%	13,638	100.00%

DEVELOPED LAND

Parcel Size in Acres	# parcels	% of Total	# acres	% of Total
< 2	11,527	87.08%	7,269	45.97%
>= 2 size < 5	1,188	8.97%	3,752	23.73%
>= 5 size < 10	422	3.19%	2,660	16.82%
>= 10 size < 20	69	0.52%	949	6.00%
>= 20 size < 35	15	0.11%	420	2.66%
> = 35	17	0.13%	762	4.82%
TOTALS:	13,238	100.00%	15,812	100.00%

Sources and Notes: Includes all residentially zoned lands. Approximates New Rural Area with quarter section data taken from the Situs file of the DDES Permits Sysytem. Extracted and compiled by King County Planning and Community Development Division, 1992.

Table 9

**Annual Average Home Price in
King, Pierce and Snohomish Counties, 1987 – 1993**

YEAR	KING	SNOHOMISH	PIERCE
1987	\$102,084	\$85,347	\$76,653
1988	\$113,959	\$93,523	\$81,271
1989	\$137,183	\$103,640	\$87,122
1990	\$173,629	\$146,142	\$100,103
1991	\$174,809	\$148,139	\$111,504
1992	\$176,647	\$150,374	\$118,469
1993	\$183,720	\$150,704	\$118,773

nm/hmprice

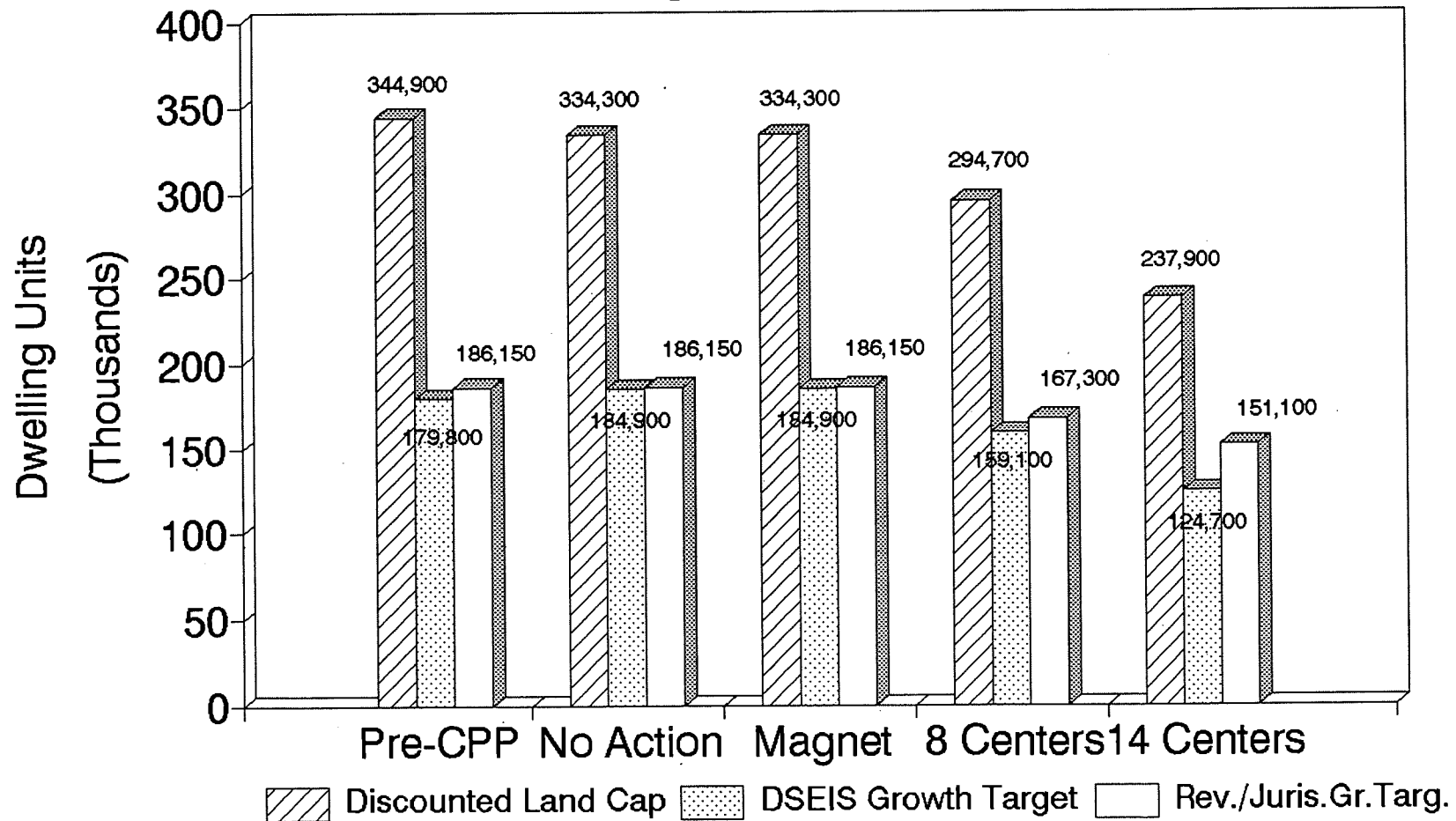
Source: Seattle–Everett Real Estate Research Report and Tacoma Real Estate Trends
Notes: All prices are for the Spring quarter, except for Pierce County in 1993
when only winter quarter data were available.

Table 12
Impacts of Policy Options
for Rural Character on Both the Centers Alternatives and the Magnet Alternative

Policy Options	Eight Centers, 14 Centers, and Magnet Alternatives
RU-1	This policy could result in less positive impacts than the adopted policy LU-9. Policy RU-1 deletes references to clustering and incentives to protect rural character, and instead discusses expansion of farming and forestry. RU-1a, limits tax benefits to contiguous land. RU-1b, provides less protection for environmentally sensitive lands, by eliminating references to incentives for small land owners. RU-17 does include some of the strategies omitted in RU-1.
Mitigation	If RU-1 is adopted, adopt RU-17 as well.
RU-3	This policy could result in significant adverse impacts to plants, animals and fish, because it deletes the requirement that septic tanks and rural roads not degrade the environment. As a result, development could occur which causes water quality problems.
	Leave Policy LU-8 in as adopted.
RU-6	This policy could result in both positive and significant negative impacts. Clustering of development can be effective in reducing the consumption of natural areas. This policy could result in greater positive impacts than LU-12, since it applies to lots of 5 acres or more rather than 10 acres or more. However, Policy RU-6 uses the phrase "may be required", implying that even where clustering would provide greater protection for natural or environmental resources, as well as the criteria, clustering may not occur.
Mitigation	Require clustering of parcels meeting the specific criteria, and include wildlife habitat as part of the criteria. Keep the five acre parcel criteria.
RU-7	This policy could have a positive impact on plants, animals and fish, as it recommends that King County utilize a transfer of development rights program for rural areas. (Adopted policy LU-2 requires cities to development programs within UGAs, and allows for interjurisdictional transfers. However, there is no provision in the adopted policies that addresses rural area programs for transfer.)
Mitigation	Adopt RU-7 or revise LU-2 to include similar language.
Supplemental Language (Suburban Cities)	Strategies that promote ecological restoration could result in positive impacts to wildlife and its habitat. Larger lot sizes are more conducive to maintaining habitat values. The policy statement regarding "minimum density of one unit per 20 acres and one unit per 35 acres" could have a negative impact on plants, animals and fish, since very low densities tend to minimize impacts to wildlife habitat while "minimum density" implies that densities shall be higher.
Mitigation	In order to protect wildlife habitat, the policy should state: maximum densities of one unit per 20 acres and one unit per 35 acres, or minimum lot size of 20 acres and 35 acres.

FIGURE 1

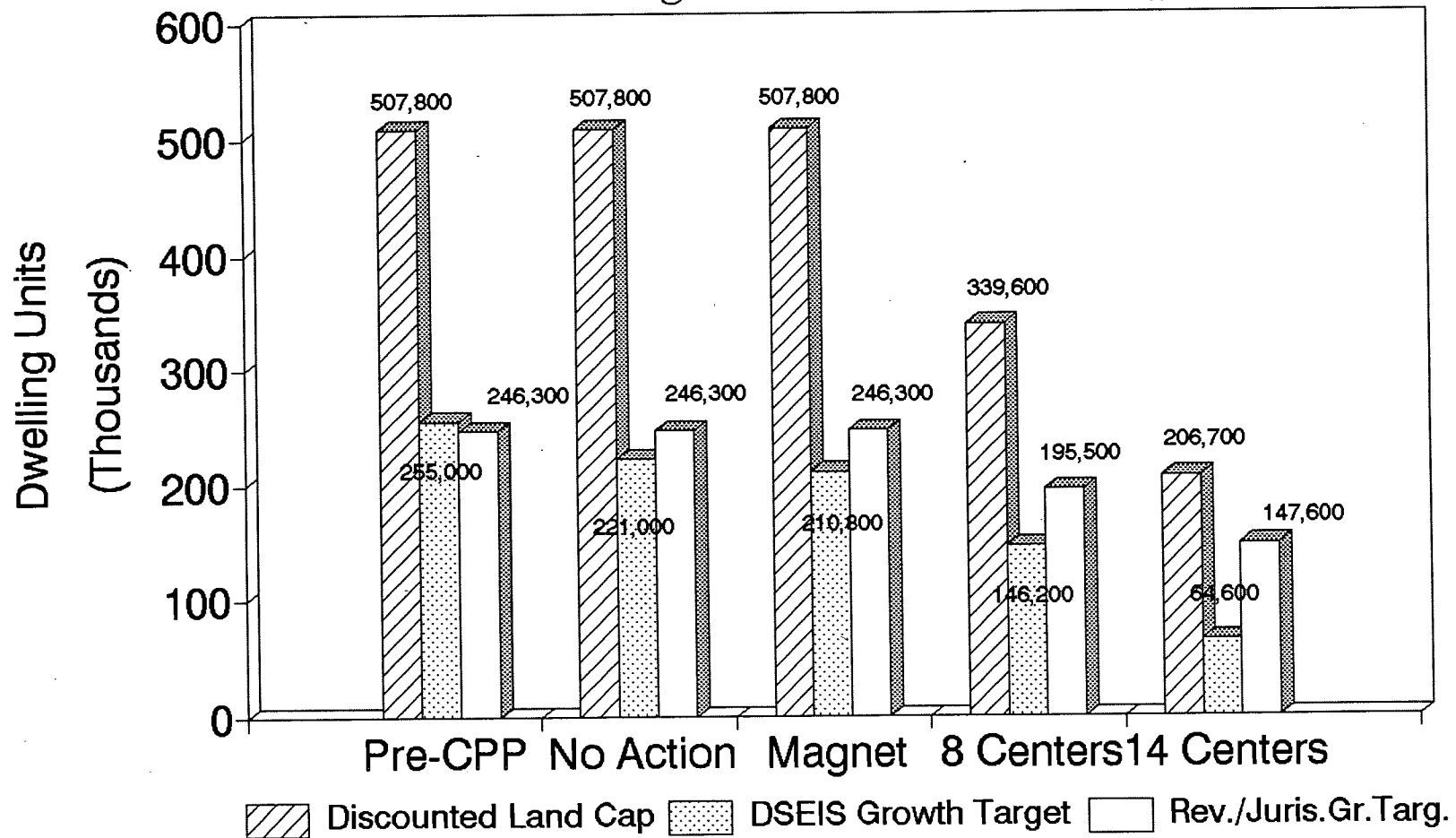
Residential Lands – Non Cntr Urban Area 20-Yr Targets vs. Disc. Land Capacity



Note: Pre-CPP incdes "new rural" designation, reabsorbed in this alternative
Magnet and two non-Center alternatives assume three centers per DSEIS p.10.

FIGURE 2

Employment Lands – Non Cntr Urban Area 20-Yr Targets vs. Disc. Land Capacity



Note: Magnet and two non-Center alternatives assume three centers per DSEIS p.10.
Manufacturing Centers not included in non-Center Urban.

FIGURE 3

King County
Single Family and Multifamily Trends
1980 Through 1992

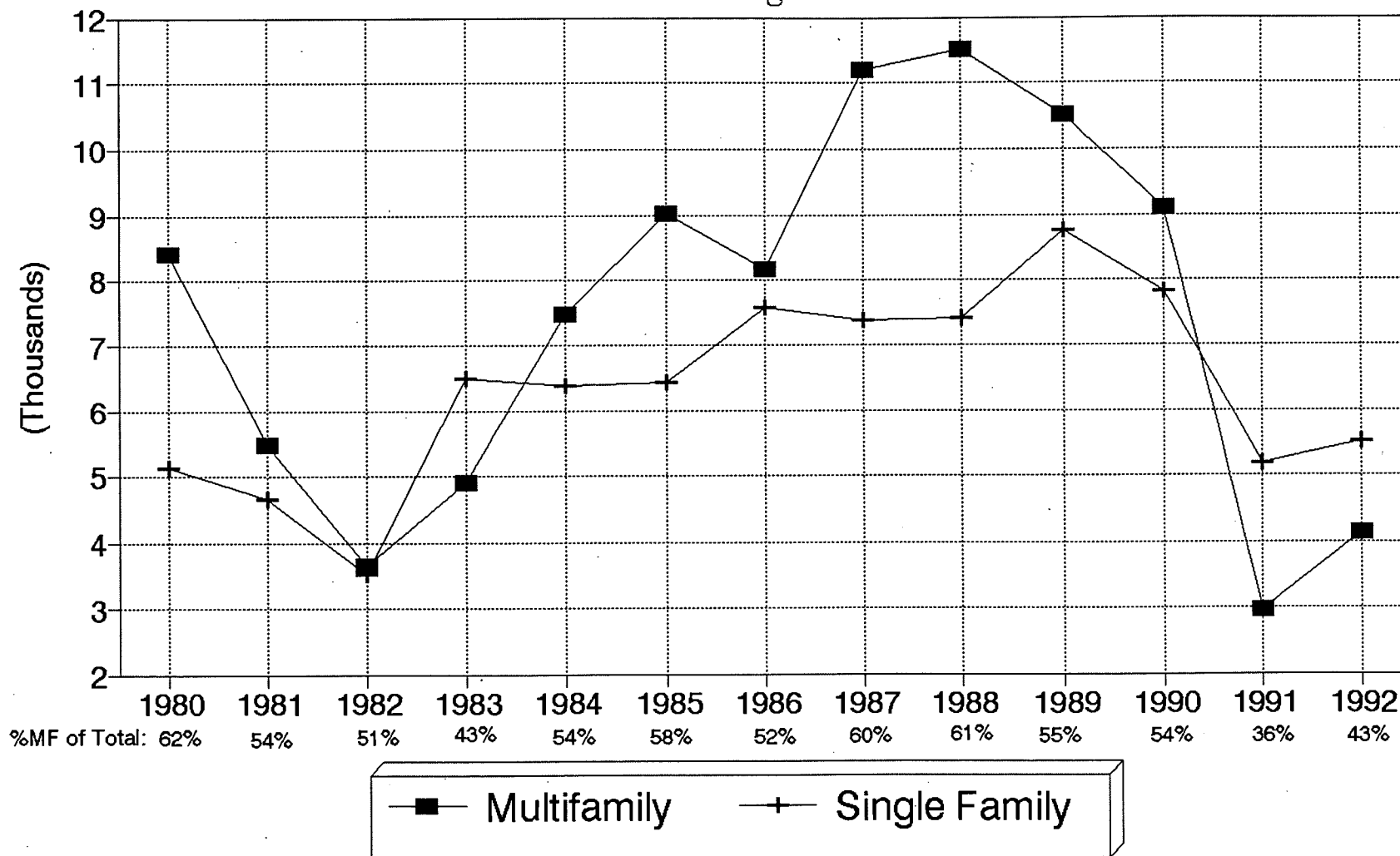
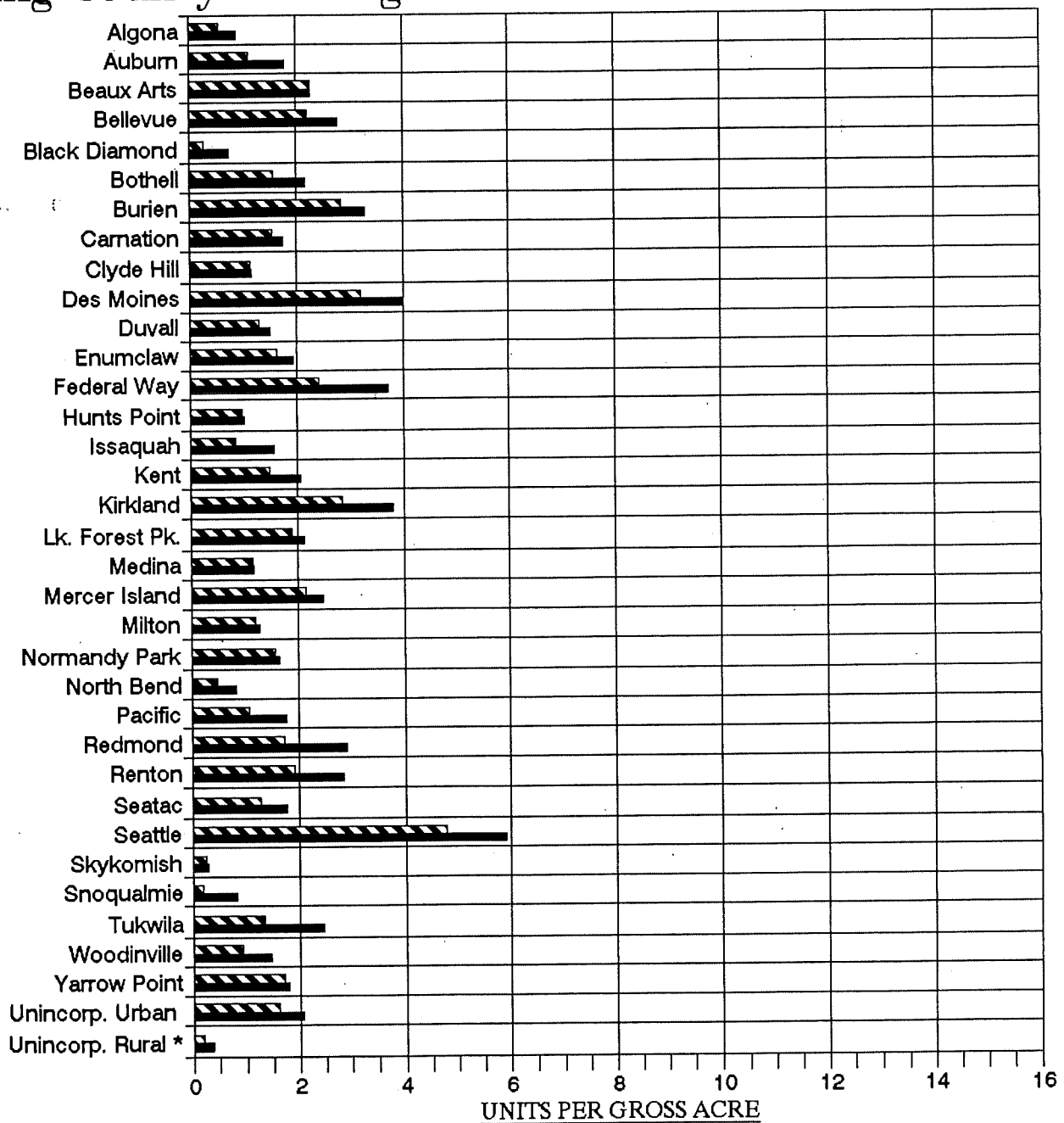




FIGURE 4

King County Housing Densities 1993 - 2013



 Units Per Gross Acre (Existing)
 1993
 Units Per Gross Acre (Includes Target)
 2013

* Excludes resource lands and open space
 Note: Assumes growth targets and 1993 boundaries, except year
 2013 includes expansion areas for 5 rural cities















Source: Population Trends for Washington State (OFM, Sept. '93)

densgrap.wq1

GROWTH MANAGEMENT PLANNING COUNCIL

PROPOSED URBAN GROWTH BOUNDARY

Map 1 of 3 - North

-  URBAN GROWTH AREA
-  Unincorporated Activity Centers
-  RURAL AREA
-  New Rural
-  Rural Town Centers
-  Forest Production Districts
-  Agricultural Production Districts
-  OPEN SPACE
-  Proposed Urban Growth Area Line
-  Incorporated Cities
-  Nominated Urban Centers
-  Municipal Watersheds
-  Muckleshoot Indian Reservation
-  Water Bodies

Note: Modifications from the 1993 Interim Urban Growth Boundary are delineated in the following reports:

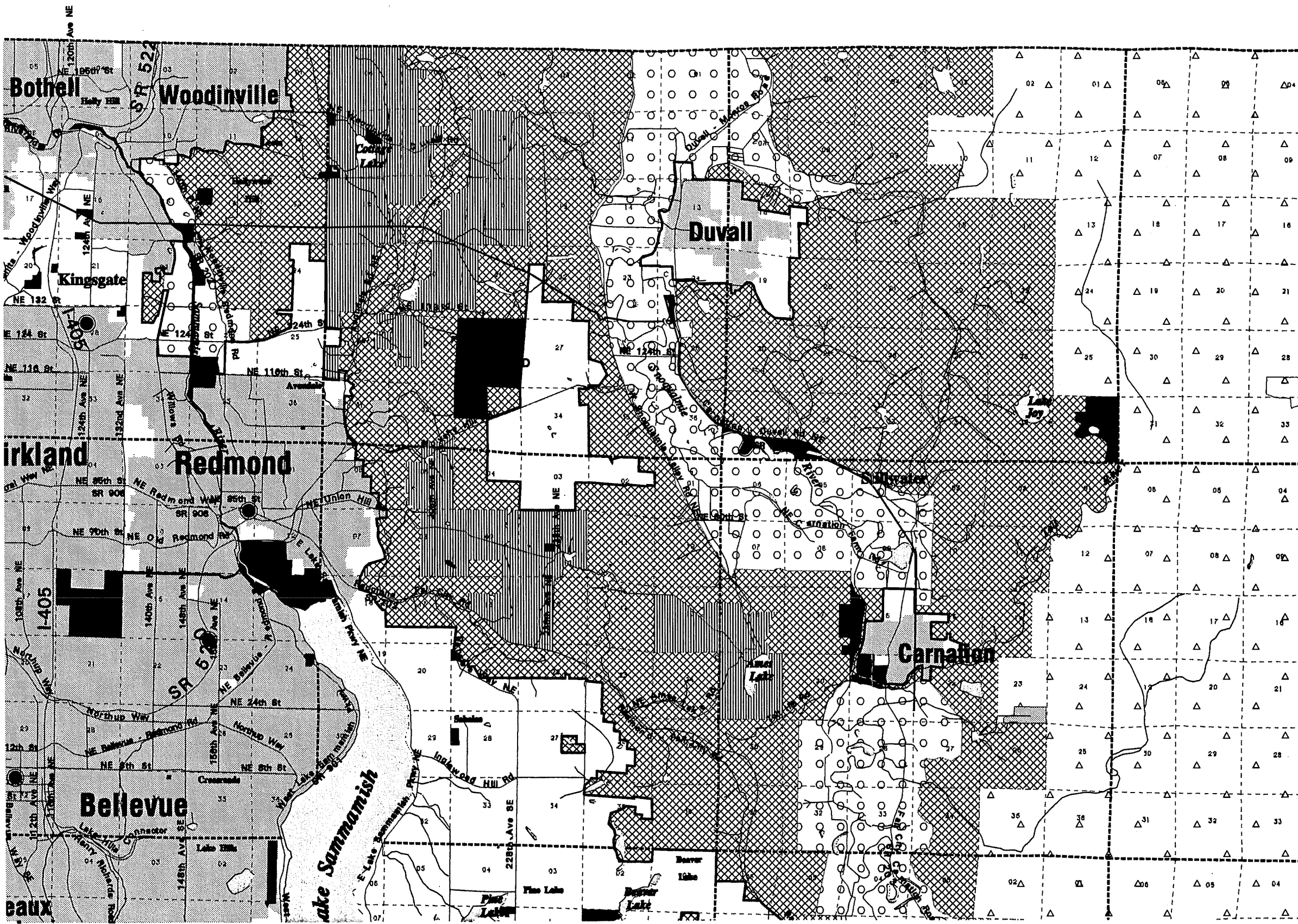
King County Urban Growth Areas: Edge Cities
Rural Cities Urban Growth Areas
Technical Review Areas

King County PCDD
 Geographic Information System

April 14, 1994

This map is intended for planning purposes only and is not guaranteed to show accurate measurements.

Boundaries may be incomplete and are the best available at the current time.



GROWTH MANAGEMENT PLANNING COUNCIL

PROPOSED URBAN GROWTH BOUNDARY

Map 2 of 3 - Central

- URBAN GROWTH AREA
- Unincorporated Activity Centers
- RURAL AREA
- New Rural
- Rural Town Centers
- Forest Production Districts
- Agricultural Production Districts
- OPEN SPACE
- Proposed Urban Growth Area Line
- Incorporated Cities
- Nominated Urban Centers
- Municipal Watersheds
- Muckleshoot Indian Reservation
- Water Bodies

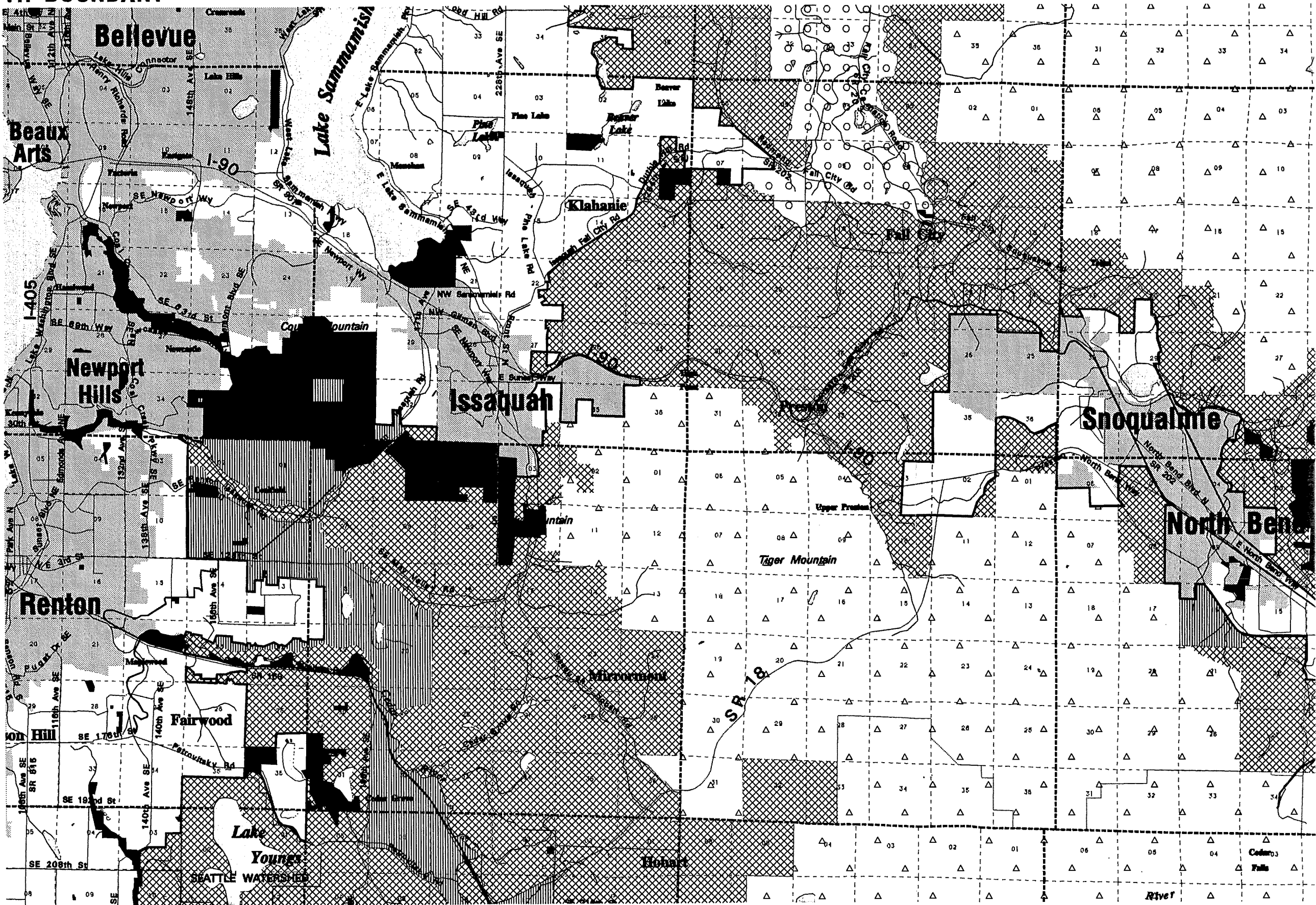
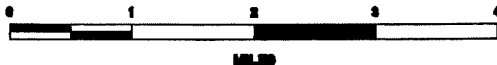
Note: Modifications from the 1993 Interim Urban Growth Boundary are delineated in the following reports:

King County Urban Growth Areas: Edge Cities
 Rural Cities Urban Growth Areas
 Technical Review Areas

King County PCDD
 Geographic Information System

April 14, 1994















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GROWTH MANAGEMENT PLANNING COUNCIL

PROPOSED URBAN GROWTH BOUNDARY

Map 3 of 3 - South

-  URBAN GROWTH AREA
-  Unincorporated Activity Centers
-  RURAL AREA
-  New Rural
-  Rural Town Centers
-  Forest Production Districts
-  Agricultural Production Districts
-  OPEN SPACE
-  Proposed Urban Growth Area Line
-  Incorporated Cities
-  Nominated Urban Centers
-  Municipal Watersheds
-  Muckleshoot Indian Reservation
-  Water Bodies

Note: Modifications from the 1993 Interim Urban Growth Boundary are delineated in the following reports:

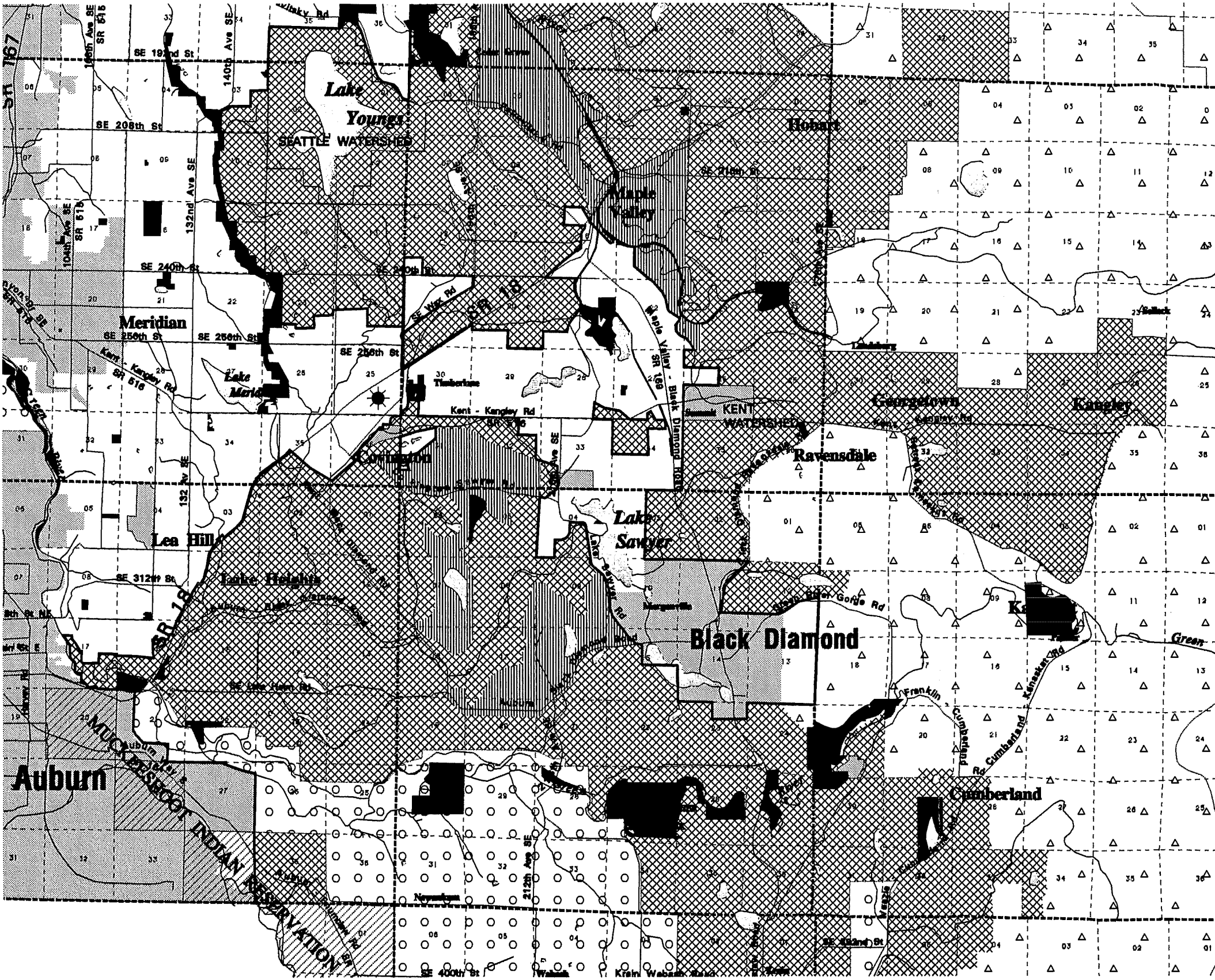
King County Urban Growth Areas: Edge Cities
Rural Cities Urban Growth Areas
Technical Review Areas

King County PCDD
 Geographic Information System

April 14, 1994

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GROWTH MANAGEMENT PLANNING COUNCIL

PROPOSED URBAN GROWTH BOUNDARY

Enumclaw, Skykomish
Snoqualmie & North Bend

- URBAN GROWTH AREA
- Unincorporated Activity Centers
- RURAL AREA
- New Rural
- Rural Town Centers
- Forest Production Districts
- Agricultural Production Districts
- OPEN SPACE
- Proposed Urban Growth Area Line
- Incorporated Cities
- Nominated Urban Centers
- Municipal Watersheds
- Muckleshoot Indian Reservation
- Water Bodies

Note: Modifications from the 1993 Interim Urban Growth Boundary are delineated in the following reports:

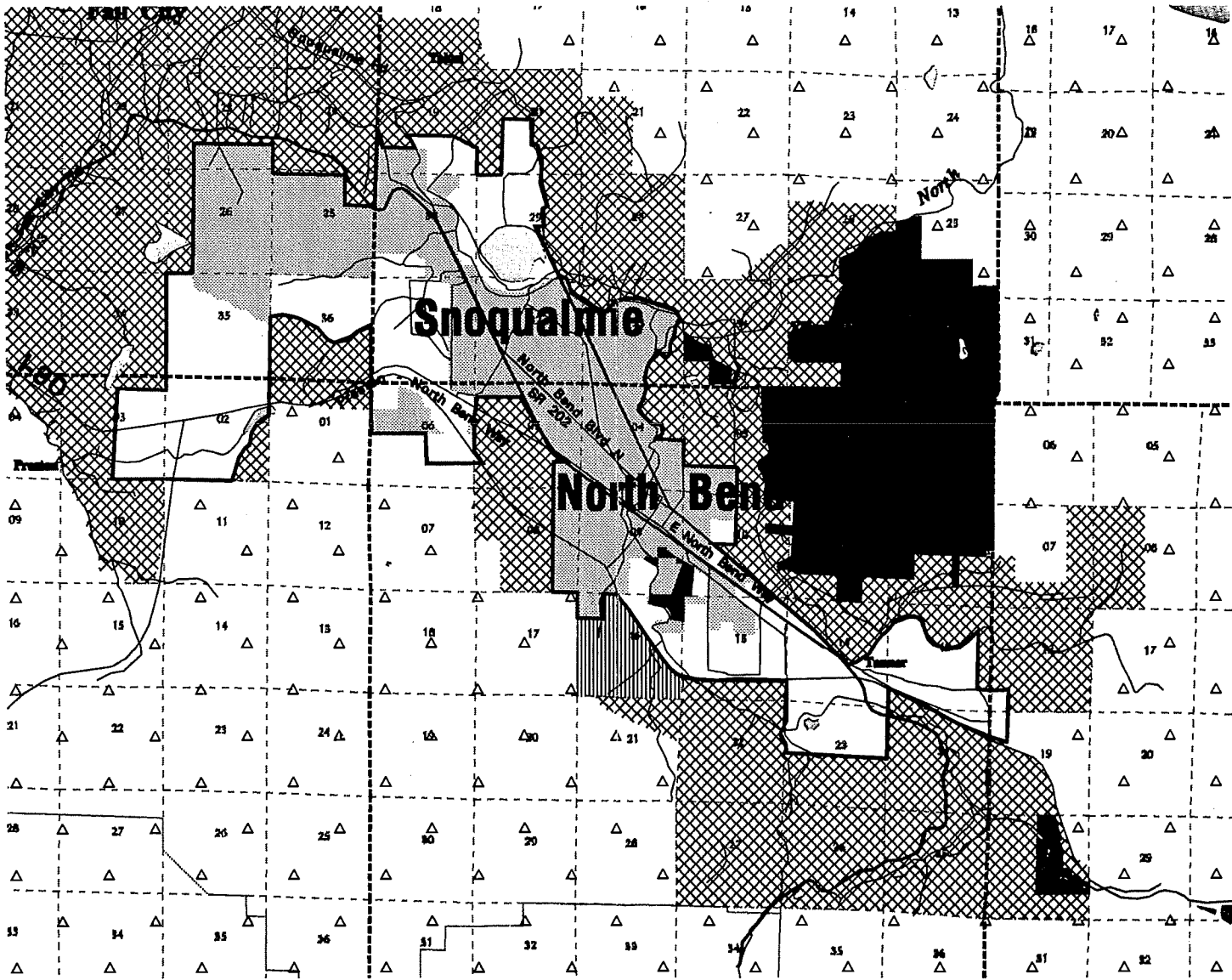
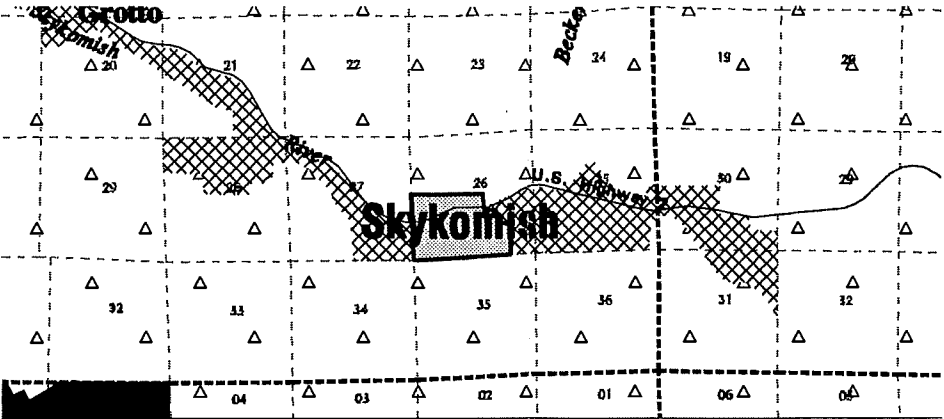
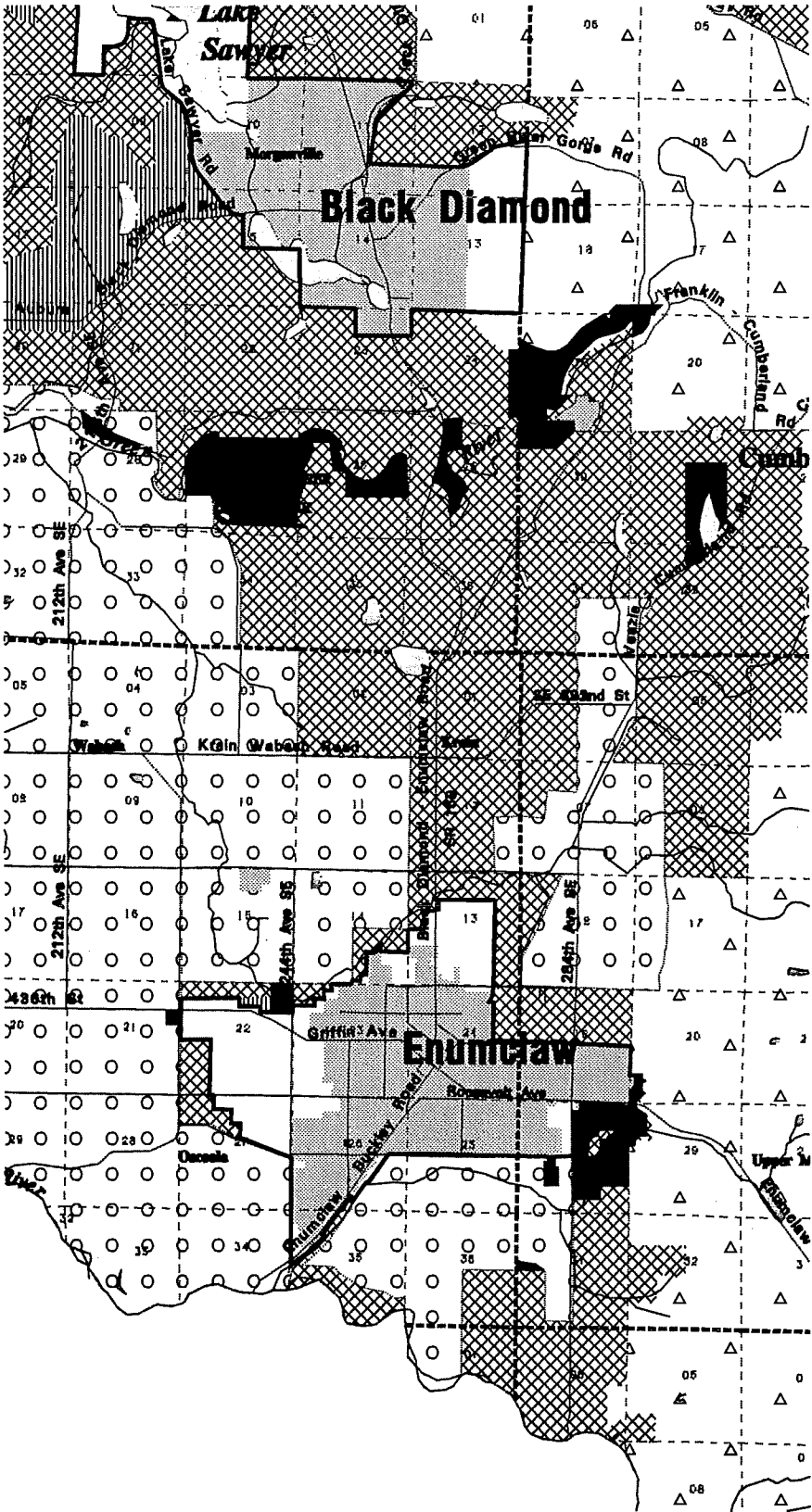
King County Urban Growth Areas: Edge Cities
Rural Cities Urban Growth Areas
Technical Review Areas

King County PCDD
Geographic Information System

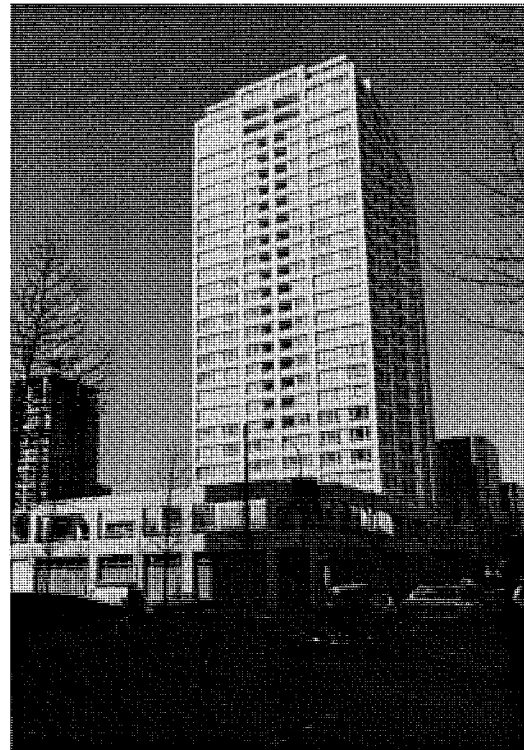
April 14, 1994

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*High-rise residential tower
(175-225 units per gross acre)*



*Mid-rise apartments
(60-80 units per gross acre)*



*Single-family in-fill
(10-14 units per gross acre)*



Urban Center Housing Choices



*Low-rise apartments over retail
(35-45 units per gross acre)*



*Townhouse development
(35-45 units per gross acre)*

FINAL SEIS DISTRIBUTION LIST

CITIES AND TOWNS

City of Algona
City of Auburn
Town of Beaux Arts Village
City of Bellevue
City of Black Diamond
City of Bothell
City of Bremerton
City of Burien
City of Carnation
Town of Clyde Hill
City of Des Moines
City of Duvall
City of Edmonds
City of Enumclaw
City of Everett
City of Federal Way
City of Fife
Town of Hunts Point
City of Issaquah
City of Kent
City of Kirkland
City of Lake Forest Park
City of Lynnwood
City of Medina
City of Mercer Island
City of Mill Creek
Town of Milton
City of Mountlake Terrace
City of Normandy Park
City of North Bend
City of Pacific
City of Redmond
City of Renton
City of SeaTac
City of Seattle
Town of Skykomish
City of Snoqualmie
City of Sumner
City of Tacoma
City of Tukwila
City of Winslow
City of Woodinville
Town of Yarrow Point

COUNTIES

King County
Kitsap County
Pierce County
Snohomish County
Kittitas County

INDIAN TRIBES

Muckleshoot Tribe

PORTS

Port of Seattle
Port of Tacoma

TRANSIT AGENCIES

Community Transit
Everett Transit
Kitsap Transit
Municipality of Metropolitan
Seattle (METRO)
Pierce Transit
Snohomish County Transportation
Authority (SNO-TRAN)

UTILITIES

Bellevue Utilities
Bryn Mawr-Lakeridge Water and
Sewer District
Cedar River Sewer and Water
District
Des Moines Sewer District
Eastgate Sewer District
Federal Way Water and Sewer
District
Highlands Sewer District
Mercer Island Water and Sewer
Utilities
Midway Sewer District
Northeast Lake Washington Sewer
District
Northeast Sammamish Sewer and
Water District
Rainier Vista Sewer District
Rose Hill Water and Sewer
Ronald Sewer District
Skyway Water and Sewer District
Snoqualmie Pass Sewer District
Soos Creek Water and Sewer
District
Southwest Suburban Sewer District
Val Vue Sewer District
Vashon Sewer District
Woodinville Water and Sewer
District
Ames Lake Water Association
Riverbend Homesites Association
Sallal Water Association

UTILITIES (Continued)

Water District #1
Water District #14
Water District #17
Water District #19
Water District #20
City of Tukwila Water District
Water District #42
Water District #45
Water District #49
Water District #54
Water District #57
Highline Water District
Sammamish Plateau Water and
Sewer District
Water District #83
Water District #85
Covington Water District
Water District #90
Water District #94
Water District #104
Water District #107
Water District #111
Water District #117
Water District #119
Water District #121
Water District #122
Water District #123
Water District #125
Water District #127
Water District #123
Wilderness Rim Maintenance
Corporation
Fire District #10
Fire District #27
Fire District #38
Fire District #45
Washington Natural Gas Company
Northwest Pipeline Company
Pacific Northwest Bell
General Telephone Company
Puget Sound Power and Light
Real Estate Division
Seattle City Light
Seattle Water Department
Snohomish County Public Utility
District
Tacoma City Light
Tacoma Water Department

FEDERAL AGENCIES

Bureau of Indian Affairs

Department of Housing and Urban
Development
Department of Agriculture
Economic Development
Administration
Environmental Protection Agency
Federal Aviation Administration
Federal Highways Administration
Fish and Wildlife Service
Urban Mass Transportation
Administration
United States Air Force
United States Army
United States Army Corps of
Engineers
United States Coast Guard
United States Navy

STATE OF WASHINGTON

Department of Community
Development (2)
Department of Ecology (2)
Department of Trade and Economic
Development
Department of Fisheries
Department of Natural Resources
Department of Parks and
Recreation
Department of Social and Health
Services
Department of Transportation:
Headquarters
District 1
Urban Mobility Office
Aeronautics Division
Marine Division
Department of Utilities and
Transportation
Department of State Planning and
Community Affairs Agency
Department of Wildlife
Energy Office
Growth Strategies Commission
Legislative Transportation
Committee
Office of Archaeology and
Historic Preservation
Office of the Governor
Planning, Research and Public
Transportation
Transportation Improvement Board

REGIONAL AGENCIES

Central Puget Sound Economic
Development District
METRO - Environmental Division
Puget Sound Air Pollution Control
Agency
Puget Sound Water Quality
Agency
Thurston Regional Planning
Council

LIBRARIES

King County Library (16)
Governmental Research Assistance
Library
Auburn Public Library
Bellevue Public Library
METRO Library
Municipal Research and Services
Center Library
Renton Public Library
Seattle Public Library (15)
Seattle Pacific University,
Weter Memorial Library
Seattle University, Lemieux
Library
University of Washington,
Suzzallo Library
Washington State Library
Washington State Department
of Transportation Library
Snoqualmie Library
Carnation Library

SCHOOLS

University of Washington, Depart-
ment of Urban Design and
Planning
Auburn School District #408
Bellevue School District #405
Enumclaw School District #216
Federal Way School District #210
Highline School District #401
Issaquah School District #411
Kent School District #415
Lake Washington School District
#414
Mercer Island School District
#400
Northshore School District #417
Renton School District #403

Riverview School District #407
Seattle School District #1
Shoreline School District #412
Skykomish School District #404
Snoqualmie School District #410
South Central School District
#406
Tahoma School District #409
Vashon School District #402

ENVIRONMENTAL GROUPS

Audubon Society
Citizens for Clean Water
Federation of Outdoor Clubs
Friends of the Earth
Greenpeace
Issaquah Environmental Council
Mountaineers
Northwest Rivers Council
Northwest Steelhead and Salmon
Council
Seattle Shorelines Coalition
Sierra Club
Washington Environmental Council
Washington Forest Protection
Association
Washington Natural Heritage
Program

COMMUNITY ORGANIZATIONS

Citizens for Responsible Growth
Central Newcastle Property
Ownership Association
Friends of Snoqualmie Valley
Mt. Si Advisory Committee
Mountaineers, Conservation
Division
Valley Citizens for Sensible
Growth
Preston Community Club
Tolt Hill Community Club
Seattle Master Builders
Ames Lake Community Club
Lake Marcel Community Club
Lake Joy Community Club
Carnation Ridge Community Club
Fall City Community Club
Sno-Valley Community Center
Duvall Businessmens Association
Vincent Community Club
Snoqualmie Valley Railway

COMMUNITY ORGANIZATIONS
(Continued)

Cherry Valley Community
Association
Duvall Historical Society
Historical Association, Inc.
Snoqualmie Valley Museum
Wilderness Rim Maintenance
Corporation

OTHER

All who commented on the DESIS

Association of Washington
Business
League of Women Voters of
Washington (5)
Municipal League (Seattle)
Seattle-King County Economic
Development Council
Seattle-King County Board of
Realtors

NEWS MEDIA

KCPQ - TV
KCTS - TV
KING TV/Radio
KIRO TV/Radio
KOMO TV/Radio
KPLU Radio
KSTW TV/Radio
KUOW Radio
Journal American, Bellevue
Morning News Tribune, Tacoma
Puget Sound Business Journal
Seattle Post Intelligencer
Seattle Times
Seattle Daily Journal of
Commerce
Snoqualmie Valley Record
Issaquah Press
Woodinville Weekly

SEIS ADVISORY COMMITTEE

Mr. Richard Chapin
Inslee, Best, Doezie & Ryder
Ms. Pat Chemnick
Economic Development Manager

South East Effective
Development
Mr. Denny Dochnahl
Mr. Andrew Duffus
Mr. Jason King
Puget Power & Light Company
Government Relations
Ms. Teresa Kalet
Ms. Doreen Marchioni
Mr. Ronald Marson
Mr. Richard E. McCann
Perkins Coie
Ms. Lucy Steers

GROWTH MANAGEMENT PLANNING
COUNCIL

Margot Blacker, Councilmember
Bellevue
Pat Davis
Port of Seattle
Brian Derdowoski, Councilmember
Metro King County
Bob Edwards, Councilmember
Renton
Jim Gildersleeve, Councilmember
North Bend
Larry Gossett, Councilmember
Metro King County
Jane Hague, Councilmember
Metro King County
Sherry Harris, Councilmember
Seattle
Rosemarie Ives, Mayor
Redmond
Fred Jarrett, Councilmember
Mercer Island
Glen Kuntz, Mayor
Duvall
Gary Locke, Executive
Metro King County
Roger Loschen, Mayor
Lake Forest Park
Sally Nelson, Councilmember
Burien
Margaret Pageler, Councilmember
Seattle
Larry Phillips, Councilmember
Metro King County

Norm Rice, Mayor
Seattle
Bob Stead, Mayor
Federal Way
Jim Street, Councilmember
Seattle
Cynthia Sullivan, Councilmember
Metro King County
Shirley Thompson, Councilmember
SeaTac
Christopher Vance, Councilmember
Metro King County
Pete von Reichbauer, Councilmember
Metro King County

OTHER KING COUNTY AGENCIES

King County Resource
Planning
King County Environmental
Division
King County Surface Water
Management Division
Seattle-King County
Health Department
King County Cooperative
Extension
King County Cultural
Resources Division
King County Development and
Environmental Services
King County Office of Open
Space
King County Parks Division
King County Department of
Stadium Administration