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These are comments on the King County Countywide Planning Policies draft. The 43rd District Environmental Caucus Strategy Committee supports the inclusion of climate as an element in the Countywide Planning Process. In particular, we want to call out the new text in EN-1, EN-2, EN-3, EN-6, EN-19, and DP-2 as being very positive changes. It is critical that our built environment allow us to sharply reduce our greenhouse gas emissions, that we act to reduce vehicle miles travelled, and concentrate growth in smaller areas where we can also offer transit services.

We do ask you to better address the following concerns:

1. The Comprehensive Plan should allow for 15-minute communities in Urban Areas. The 15-minute community means that people should be able to get to their job, schools, and basic services within a 15-minute walk or bike ride. This will markedly reduce the need for cars and improve the quality of our lives.

2. While people working in one place may choose to live elsewhere, the Comprehensive Plan should support working people living in the community where they work. Communities that host retail jobs and services should be required to provide for the housing suitable for the people working those jobs. This has the benefit of better integrating our society, so that we are not siloed by income level. It will also reduce the need for transportation overall, as currently many of the people working retail or service jobs are forced to live on the fringes, far from where their jobs are.

3. Driveways on busy roads should be avoided where possible. Anyone adding or making substantial changes to a building on a busy road should position the driveway so it faces onto an alley or less busy cross-street or explain why this is not possible. These driveways for residences and businesses are a major source of accidents and traffic slowdowns. Roads should be for getting from one neighborhood center to another, and smaller streets should be for getting to one’s destination. This is an important change for road safety.

4. DP-40 says: “Where appropriate, provide for connectivity in the street network to accommodate walking, bicycling, and transit use, in order to promote health and well-being.” I We support this, but "where appropriate" leaves a lot up for interpretation. Criteria are needed that would indicate what is appropriate.

5. DP-41 calls for: “preservation of significant historic, visual, archeological, cultural, architectural, artistic, and environmental features, especially where growth could place these resources at risk. Celebrate cultural resources that reflect the diversity of the community. Where appropriate, designate individual features or areas for protection or restoration. Encourage land use patterns and adopt regulations that protect historic resources and sustain historic community character.” These sorts of provisions for historic neighborhoods have been used inappropriately in wealthy neighborhoods to block development which would advance other important goals. Criteria should be included that prevent such designations from being used to block development of affordable housing and essential services in urban communities where they are needed.

6. H-25 removes the timeline for reviewing affordable housing progress relative to goals. We understand
that a 5-year timeline does not fit well within another 8-year planning cycle. Can we instead change the timeline to 4 years?

7. T-24 calls for promoting: "the expanded use of alternative fuel (e.g. electric) and zero emission vehicles by the general public with measures such as converting transit and public and private fleets, applying incentive programs, and providing for electric vehicle charging stations". We totally support this. In addition, it should also prioritize high mileage vehicles over other vehicles for any incentive programs.

Thank you for providing this important document for public comment, and for taking our feedback on it. These matters are essential for reducing greenhouse gas emissions, and for maintaining our quality of life, and we appreciate you attention.

Robin Briggs
On behalf of the 43rd LD Environmental Caucus Strategy Committee
Merek Chertkow, chertkow@gmail.com

Dear Growth Management Planning Council and Inter-Jurisdictional Team staff,

As residents of Maple Valley, we are concerned that the areas of Maple Valley, Covington, Black Diamond, and Enumclaw have growth targets in the GMPC draft growth target update process that are too high.

Maple Valley and southeast King County have grown significantly over the past 30 years. This has caused longer commutes and pressure for taxpayers to expand roads. Our transit is nonexistent and significant transit investment in our area is not being realistically considered, nor would it be cost-effective compared to other transit needs in our region. Our forests and farms have suffered. We have seen pressure to expand the urban growth boundary and create more sprawl.

We support natural areas conservation for King County and Western Washington, and responsible government spending. We support plans to put more of our region's growth in transit-oriented communities. We know there are infrastructure savings and environmental benefits of a firm urban growth boundary.

It is clear that after many years of suburban car-centered development in Maple Valley, a serious effort needs to be made to reduce development, infrastructure, and transportation costs near the fringe of the urban growth boundary. Density should increase nearer to existing job centers.

Yet our area is being targeted by developers who want to build in the old model of suburban sprawl. This is happening in Maple Valley and we think our city needs to seriously consider a much smaller target. However, we are particularly concerned that the very large growth targets for our neighbors Black Diamond and Covington will create transportation issues for our entire area. (page 23 https://www.kingcounty.gov/~/media/depts/executive/performance-strategy-budget/regional-planning/CPPs/2021-CPP-Update/2021-CPP-Matrix-Proposed-Update-GMPC-Approved-PRD033121.ashx?la=en )

Massive growth in Black Diamond will not generate family-wage jobs. It will generate pass-through traffic for Maple Valley, unincorporated King County, and Covington. The roads are already dangerous and we don't have enough walking and biking infrastructure. We need to prioritize our limited transportation funding toward safety, catching up on our maintenance backlog, and complying with State mandates for fish passage. We also need to find ways to balance our government services and spending in a way that does not involve crowding our roads and over-development in the wrong places.

Please reduce the growth targets for southeast King County. Again, we support our taxes paying for transit, housing for those working at lower income levels, and safety. We do not support subsidizing growth in the outer edge cities that are least able to grow in an environmentally friendly way

Merek Chertkow

Maple Valley resident
May 5, 2021

Karen Wolf, FAICP, Senior Policy Analyst
Staff Contact for Growth Management Planning Council
King County Office of Performance, Strategy and Budget

Dear Ms. Wolf:

Thank you for providing an excellent overview of the draft 2021 King County Countywide Planning Policies (CPPs) and growth targets at the April 26 Bellevue City Council meeting. The information you presented was well received by Councilmembers and helped reinforce the importance of the revised policies to reinforce the shared framework for growth management in King County and an essential foundation for local comprehensive plan updates.

Bellevue City Councilmembers expressed strong support for the focus on housing and the approach for the CPPs which is consistent with Bellevue’s approach to diversity and equity. The draft CPPs also are well aligned and consistent with Bellevue’s planning for the future in areas such as the Centers Growth Strategy, Public Facilities, Environment, and Transportation Safety and Connectivity.

The City of Bellevue is interested in additional CPP refinements by the GMPC related to:

- Consideration of additional job growth in Bellevue above draft target to meet market-driven demand.
- Recognizing differences across jurisdictions on housing and the need for more flexibility in the tools needed to deliver more housing.
- Consideration of additional guidance on housing AMI levels through the CPPs.
- Additional focus on people living closer to where they work rather than on longer commutes.
- Fine-tuning data collection and monitoring to provide more clarity and reduce the burden on all jurisdictions related to county work versus individual city work.
- Consolidating dashboard and housing data across jurisdictions to provide more consistency and comparison.

I am pleased to support the updated policies and appreciate your consideration of the refinements outlined above. If you have questions or need additional information, please contact Emil King of our Community Development Department at 425-452-7223. Again, many thanks for your consideration of our requests.

Sincerely,

Mayor Lynne Robinson
City of Bellevue
CC:

Brad Miyake, City Manager  
Deputy Mayor Jared Nieuwenhuis  
Councilmember Jeremy Barksdale  
Councilmember Conrad Lee  
Councilmember Jennifer Robertson  
Councilmember John Stokes  
Councilmember Janice Zahn
May 4, 2021

Growth Management Planning Council
C/O Karen Wolf FAICP, Senior Policy Analyst
Performance, Strategy, and Budget
VIA EMAIL ONLY: GMPC@KingCounty.gov

RE: DRAFT 2021 King County Countywide Planning Policies

Growth Management Planning Council,

The City of Des Moines appreciates the opportunity to comment on the draft Countywide Planning Policies (CPPs) designed to implement Vision 2050. The City appreciates the stated focus on equity and revisions to address the new Regional Growth Strategy. We have also appreciated the collaborative manner of determining the growth targets that will provide the basis for planning through the next comprehensive plan update process.

The City has the following concerns and comments, primarily related to areas where we believe that the Vision 2050 policy direction has not been adequately implemented in the Countywide Planning Policies. The Vision 2050 process was a multi-year effort, with active participation from the City of Des Moines. Many of these comments relate to areas that were revised in the final Vision 2050 document in response to the City’s comments, and those of other jurisdictions. In general, the City also supports the comments contained in the joint letter provided from our nearby South King County Cities.

Comments are organized by policy number below.

DP 20 and DPX2:
The meaning of DP 20 and DPX2 is unclear. If the intent is to designate a new role for the King County Growth Management Planning Council (GMPC) in determining compliance with City growth targets, the City is not in favor of this change. While the City appreciates the important role of the GMPC, not only would this add an unnecessary layer of complexity to the planning process, but potential controversy to the role of the GMPC. How would this intersect with the Growth Management Hearings Board process? Although the stated purpose is to codify the current collaborative process, policy DP 20 needs revision to achieve this goal.

Policy DP 20 should be revised as follows:
DP-20 If necessary based on the findings of a periodic buildable lands evaluation report, adopt reasonable measures, other than expansion of the Urban Growth Area, to increase land capacity for housing and employment growth within the Urban Growth Area by making more efficient use of urban land consistent with current plans and targets. The County and its cities, through the Growth Management Planning Council, will collaboratively determine whether reasonable measures other than amending the Urban Growth Area are necessary to ensure sufficient additional capacity if a countywide urban growth capacity report determines that: a) the current Urban Growth Area is insufficient in capacity to accommodate the housing and employment growth targets; or b) any jurisdiction contains insufficient capacity to accommodate the housing and employment growth targets, has not made sufficient progress toward achieving the housing and employment growth targets, or has not achieved urban densities consistent with the adopted comprehensive plan. Reasonable measures should be adopted to help implement local targets in a manner consistent with the Regional Growth Strategy.

DP 38:
Planning should support local centers and use the language directly from the Multicounty Planning Policy (MPP) “MPP-DP-25 Support the development of centers within all jurisdictions, including high-capacity transit station areas and countywide and local centers.”

H-1:
This policy fails to recognize that South King County, including Des Moines, provides a large percentage of the region’s affordable housing and should not be disproportionately held to the same standard of constructing new affordable housing as other regions of King County. The single standard for all jurisdictions results in maintaining the status quo – rather than equitable distribution of housing and affordability for residents across the County. Des Moines and the rest of South King County should be supported in attracting market rate housing to provide a full range of housing choice for our communities.

H-16/H-4:
This policy does not mirror the MPP. CPP language states “expanding capacity for moderate density housing throughout within the jurisdiction, especially in areas currently zoned for lower density single-family detached housing”, while MPP-H-9 states “Expand housing capacity for moderate density housing to bridge the gap between single-family and more intensive multifamily development and provide opportunities for more affordable ownership and rental housing that allows more people to live in neighborhoods across the region.”

Local ability to decide locational criteria for the various housing forms is a foundation of the Growth Management Act, and important to create unique and vibrant communities. Proximity to transit, environmental constraints, and infrastructure availability as well as other factors influence local zoning decisions.
H-23/H-16:
Some of the data requested to be reported in “d” (e.g. income restricted units) is not available or tracked by communities. This will require criteria regarding how this data is tracked along with potential financial support to implement. This policy presumes that affordable housing needs financial support from the jurisdiction, and the information requested is reported to the jurisdiction. That is often not the case in South King County. The City of Des Moines has had recent creation of 649 affordable housing units, without support other than an efficient permitting process.

Transportation:
Generally, the revisions do not recognize the change in the Regional Growth Framework of Vision 2050. Particularly, that a new designation of High Capacity Transit Community (HCTC) was implemented (Des Moines is a HCTC) designated to receive a larger share of regional growth. 24% of the population growth and 13% of employment growth will be directed in proximity to transit. HCT communities previously were not well situated to compete for regional funds. The concept of the previous centers framework has shifted and transportation investments must also shift. Policies should reflect the new Regional Growth Strategy:

TX-2:
Add High Capacity Transit Communities

T-4:
“MPP-T-19 Design in transportation programs and projects to support local and regional growth centers and high-capacity transit station areas.” High capacity station area” has a specific meaning in Vision 2050. The CPP does not capture the meaning of the MPP and simply requires station plans, leaving out “support” as well as local centers and high capacity station areas. Recommend revising the policy to be consistent with MPP-T-19.

TX-8:
This MPP was the subject of much discussion during Vision 2050, and implements the State legislation directing the siting of a new commercial aviation facility. A very important phrase from the MPP was left off of the proposed CPP and should be restored. “Support the ongoing process of development of a new commercial aviation facility in Washington State.”

T-8, and TX-7:
These policies do not capture the meaning of MPP-T-8 below, and reflect the previous growth strategy of Vision 2040. Vision 2050 shifts growth to areas in proximity to transit in order to leverage transit investments and reduce environmental impacts. The new designation of HCTC is not accounted for in these policies. The policies should be revised to follow the new regional growth strategy of Vision 2050 to read as follows:

T-8 Prioritize state, regional and local funding to transportation investments that support countywide growth targets and are focused on multi-modal mobility and safety, equity, and climate change goals, and focus investments consistent with the Regional Growth Strategy.
TX-7 Determine if capacity needs can be met from investments in transportation system operations and management, pricing programs, transportation demand management, public transportation and system management activities that improve the efficiency of the current transportation system, prior to implementing major roadway capacity expansion projects. Focus on investments that are consistent with the Regional Growth Strategy and produce the greatest net benefits to people, especially communities and individuals where needs are greatest, and goods movement that minimize the environmental impacts of transportation.

For reference: MPP-T-8 states, “Strategically expand capacity and increase efficiency of the transportation system to move goods, services, and people consistent with the Regional Growth Strategy. Focus on investments that produce the greatest net benefits to people and minimize the environmental impacts of transportation”

PF-20:
This policy is not consistent with the adopted MPP goal of reducing adverse impacts on historically marginalized communities. Affordable land prices continue to lead to the placement of a disproportionate share of regional facilities with negative impacts (e.g. transfer stations, halfway houses, work release facilities etc.) in South King County.

Policy PF-20 should be revised as follows:

Site or expand public capital facilities of regional or statewide importance within the county using a process that incorporates broad public involvement, and that reduces adverse social, environmental, and economic impacts on historically marginalized and disproportionately burdened communities, and equitably disperses impacts and benefits while supporting the Countywide Planning Policies.

For reference: MPP-PS-29 reads, “Site or expand regional capital facilities in a manner that (1) reduces adverse social, environmental, and economic impacts on the host community, especially on historically marginalized communities, (2) equitably balances the location of new facilities away from disproportionately burdened communities, and (3) addresses regional planning objectives”.

Thank you for the opportunity to comment, and for serious consideration of the City’s comments.

Sincerely,

Matt Pina
Mayor

Michael Matthias
City Manager

The Waterland City
Good Evening GMPC,

The City of Duvall would like to provide public comments on the draft documents. First I would like to thank King County staff and the collaborative approach to the 2021 update beginning with the growth target process. Ben Peterson and Rebeccah Maskin provided support and expertise during the process. For a small city like Duvall it would have been helpful if the Urban Growth Capacity Report was released earlier in the process so that cities had more time to review the details. Having the UGC and CPP role out for public comment at the same time with a 30 day comment period made it difficult for staff to do a through review and have internal conversations with administration and external conversations with the Planning Commission and City Council. Small cities like Duvall have very limited staffing and capacity. Many of our small cities have City Council and Planning Commission meetings twice a month.

As you can see from the attached resolution the City of Duvall was very thoughtful in its process towards identifying and articulating its growth targets for the 2019-2044 planning period. The City of Duvall wishes to convey to GMPC, King County, PSRC, and the State of Washington without capacity and safety improvements to regional roads, highways, expanded transit, and other regional infrastructure the City will only be able to accommodate a small amount of growth.

Comments – 2021 King County Growth Capacity Report

1. Page 160 – Consider including Duvall’s pipeline growth through 2018. This would provide a better view to current and future development pressures on our community. This would document that Duvall will likely achieve its current growth target early.
2. Page 294-303 – the data for cities appears to be lumped by like cities. Please provide the methodology.
3. Page 326 – We would like to better understand why there is a data gap (suppressed) for Duvall. The data was gathered in previous BLR.
4. Page 326-329 – Are home occupations counted in the job numbers. If not why? Duvall has a significant number of home occupations (permit/business license data).
5. Page 354 – Appendix G Approach for identifying infrastructure gaps
   This section of the report lacks detail. It appears that a consultant looked at communities CP and only made contact under certain parameters. A survey on infrastructure gaps would not only be helpful but is necessary. Appendix G does not adequately reflect Duvall’s story. Duvall received PSRC certification in 2016 (Transportation Plan Update). Duvall’s CP incorporates by reference (water, sewer, storm, transportation, government facilities plans). Regional roads and transit through Duvall are not sufficient to accommodate regional growth. Capital projects (upgrades to our existing system) are required to accommodate future growth of our community (water, sewer, transportation). This is a consistent message many of us shared in the Cities and Towns Caucus. Duvall recommends a survey be sent to cities to better gauge communities “infrastructure gaps”.

The City anticipates providing additional comments on the draft CPP by the end of the week. Thank you for this opportunity to participate in the process.

Sincerely,

Lara
CITY OF DUVALL
WASHINGTON
RESOLUTION NO. 21-05

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF DUVALL, WASHINGTON, CONVEYING A PRELIMINARY HOUSING AND JOB TARGETS FOR THE 2019-2044 PLANNING PERIOD TO KING COUNTY.

WHEREAS, the City of Duvall is on track to achieve and is likely to exceed the 2006-2035 Growth Targets as set out in the Comprehensive Plan; and

WHEREAS, the current City of Duvall 2006-2035 target is 1,140 units and the City has issued 760 residential permits since 2006 and the City has 523 vested units in the pipeline; and

WHEREAS, the permits issued since 2006 plus the vested units shows we are on track to exceed the 2006-2035 target by 143 units; and

WHEREAS, under the Growth Management Act, counties in consultation with cities, are responsible for adopting population and employment growth targets to ensure that each county collectively is accommodating projected population and employment; and

WHEREAS, the growth targets are a key input within our planning documents including the Comprehensive Plan, and are used to inform planning for land use, transportation, capital facilities and financing of capital improvement plans; and

WHEREAS, it is important for cities like Duvall and across the region to work together and with the public to plan for new growth: and

WHEREAS, as a part of the 2021 Countywide Planning Policies update, King County is leading the process to set new growth targets for jurisdictions to use in the 2024 periodic update of comprehensive plans. Creating growth targets is a collaborative effort in King County and facilitated by King County staff with the participation of planning staff from each jurisdiction; and

WHEREAS, the growth target process uses the VISION 2050 REGIONAL GROWTH STRATEGY as a platform for distributing growth to King County and Regional Geographies within King County; and

WHEREAS, the growth target process is a deliberative process to refine a set of preliminary housing and job growth targets for each jurisdiction: and

WHEREAS, growth targets will be finalized and adopted by the GROWTH MANAGEMENT PLANNING COUNCIL in the adopted 2021 Countywide Planning Policies; and
WHEREAS, the Regional Growth Strategy envisions a future where the region maintains a stable urban growth area, focuses the majority of new population and employment within the urban growth area, maintains a variety of community types, densities and sizes, focuses growth in cities, and uses existing infrastructure and new investments efficiently; and

WHEREAS, Growth Targets are policy statements about the amount of housing and job growth each jurisdiction plans for; and

WHEREAS, Under the Growth Management Act, all jurisdictions share a role in accommodating future growth, though the amount will differ by the role each jurisdiction plays in the county and region; and

WHEREAS, targets express growth over a range of time (2019-2044 for the targets in progress), and the new targets will replace the 2006-2035 target; and

WHEREAS, Targets form the basis for the land use assumptions in comprehensive plans; and

WHEREAS, land use assumptions used in comprehensive plans must be substantially consistent with adopted growth targets; and

WHEREAS, growth targets are the numbers jurisdictions should be aiming for in their Comprehensive Plans; and

WHEREAS, jurisdictions in King County would be well served to fully participate in setting growth targets, to ensure they reflect anticipated future growth of the county and region; and

WHEREAS, data factors were identified from past growth targets setting exercises, and input from planners and staff on the Growth Management Planning Council’s Interjurisdictional Team, and the Urban Growth Capacity Technical Committee. The data factors selected include: current 2006-2035 targets, recent jobs and housing growth (2012-2018, and 2006-2019 respectively), current jobs and housing estimates (2019 and 2020, respectively), jurisdiction land area, and initial capacity estimates of housing units and non-residential square feet, from draft Urban Growth Capacity Report data; and

WHEREAS, after the data factors are collected, they are converted to a percentage share that can be applied to the Regional Geography allocations to create preliminary targets for each jurisdiction; and

WHEREAS, the City of Duvall is in the “Cities and Town Caucus” with 19 cities in King County; and

WHEREAS, Cities and Towns include a diverse array of jurisdictions, including places near major cities, small residential towns, and free-standing cities and towns surrounded by rural and resources lands; and
WHEREAS, Cities and Towns provide important housing, jobs, commerce, and services in their downtowns, and local centers; and

WHEREAS, free-standing cities are separated from contiguous urban growth and should serve as hubs for housing choices and job and service centers for surrounding rural areas, but due to physical isolation from the more urban areas they receive a lesser overall share of the growth and are not expected to grow as much as cities and towns in the contiguous urban growth areas; and

WHEREAS, the Community Development Director reports meeting information and data to the Mayor, City Council, Planning Commission, and Land Use Committee after each caucus meeting; and

WHEREAS, the Regional Growth Strategy calls for Cities and Town to accommodate 6% of the region’s growth and 4% of its employment by the year 2050; and

WHEREAS, the regional housing allocation for Cities and Town is 13,985 housing units and 12,936 jobs in King County; and

WHEREAS, Duvall’s preliminary average target identified by King County in consultation with the Community Development Director includes an additional 891 housing units and 994 jobs; and

WHEREAS, the City of Duvall is on track to achieve and likely exceed the preliminary 2019-2044 residential growth target given existing capacity within City limits; and

WHEREAS, the preliminary 2019-2044 King County Growth Target for the City of Duvall is 891 units, and the City has issued 240 residential permits since 2019, and the City has 523 vested units in the pipeline; and

WHEREAS, the permits issued since 2019 plus the vested units shows we are on track to meet the 2019-2044 preliminary target with existing capacity to achieve the remaining 128 units within city limits; and

WHEREAS, the City of Duvall can accommodate the preliminary residential growth target provided by King County without annexing land within its designated urban growth areas; and

WHEREAS, the City wishes to convey to King County, Puget Sound Regional Council, and the State of Washington without capacity and safety improvements to regional roads and highways, additional transit, and other regional infrastructure the City will only be able to accommodate a small amount of growth in the 2019-2044 planning period; and

WHEREAS, the City understands the target is neither a floor, ceiling, or a mandate; and
WHEREAS, during the Pandemic the City’s ability to conduct in-person meetings to take public comment on the future growth of Duvall is challenging, the Land Use Committee recommended council survey the community on growth prior to committing to a final growth target for housing and jobs.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF DUVALL, WASHINGTON, DO RESOLVE AS FOLLOWS:

The City of Duvall Growth Target is 1,140 units and of those units the City has issued 760 residential permits since 2006 and has 523 vested units in the pipeline (Exhibit A).

Section 2. Pipeline Projects.
The City of Duvall currently has 523 residential units in the pipeline (Exhibit B).

Section 3. Meet and Exceed 2006-2035 Growth Target
The City of Duvall is on track to achieve and likely exceed the 2006-2035 Growth Target as set out in the 2015 Comprehensive Plan by 143 units (Exhibit A).

The City of Duvall is preliminarily accepting an additional 891 housing units and 994 jobs based on extensive analysis of the data presented to staff, mayor and council.

The City of Duvall is on track to achieve the preliminary 2019-2044 residential growth target given the City has issued 240 residential units since 2019 and the City has 523 vested units in the pipeline (Exhibit A).

Including permits issued since 2019 plus the vested units demonstrates we are on track to meet the 2019-2044 preliminary residential growth target with existing capacity to achieve the remaining 128 units within existing city limits (Exhibit A).

Section 7. Public Participation and Outreach During the Pandemic.
The City will conduct a “Growth Management Survey” of the community in late February and early March. The City will use this information to make an informed policy decision related to the final 2019-2044 Growth Targets prior to adopting a final residential target.

PASSED BY THE CITY COUNCIL AT A REGULAR MEETING THEREOF ON THE ____ DAY OF ____________________, 2021.
Resolution No. 21-05
Passed by City Council: 02/16/2021
May 5, 2021

Growth Management Planning Council
C/O Karen Wolf FAICP, Senior Policy Analyst
Performance, Strategy, and Budget

VIA EMAIL ONLY: GMPC@KingCounty.gov

RE: DRAFT 2021 King County Countywide Planning Policies

Dear Growth Management Planning Council:

This letter provides comment from the undersigned cities on the Draft 2021 King County Countywide Planning Policies (CPPs). The cities appreciate and support the regional goals and policy approach reflected in the CPPs. In particular, the CPPs acknowledge the historic inequities and current disadvantages faced by the Black, Indigenous, and Persons of Color (BIPOC) communities and provide a clear basis for the region to prioritize funding and resource distribution to these communities. The CPPs also acknowledge and provide a policy basis to address the growing regional challenges in meeting the Growth Management Act (GMA) mandate to make “…adequate provisions for existing and projected needs of all economic segments of the community (RCW 36.70A.070(2)).”

Summary

In light of these shared goals, the draft CPPs should be further amended to address the following:

- Regional affordable housing:
  - Recognition that the undersigned cities host a large percentage of the region’s affordable housing and should not be held to the same standards in constructing new affordable housing as other regions of King County.
  - Affordable land prices are leading to the placement of a disproportionate share of regional facilities with negative externalities (e.g. transfer stations, jails, halfway houses, homeless shelters etc.) in South King County.

- Efficiency and inequity: Assurance that seemingly impartial standards like "efficiency" will not be used to perpetuate historical patterns of unequal access to opportunity for BIPOC communities in South King County cities.

- Regional collaboration: Recognition that regional challenges should be addressed through a well-defined collaborative process.
Regional Affordable Housing
The undersigned cities in South King County (SKC) represent communities that are predominantly BIPOC. The vast majority of “naturally occurring” affordable housing (NOAHs) in King County is found in our communities, and we are working to preserve this affordable housing stock. The SKC cities have long recognized their role in providing a key resource to King County residents looking for an affordable alternative to the unattainable prices found throughout Seattle and East King County (EKC). In fact, many of the undersigned cities have undertaken the preparation of a Housing Action Plan (RCW 36.70A.600(2)), which has resulted in increased analysis of the affordable housing problems facing King County. Many SKC cities’ housing units consist almost entirely of NOAHs, and for some SKC cities, a quarter or more of their multifamily housing stock is subsidized. This situation is not well represented or adequately addressed in the draft CPPs.

Draft CPP policy H-1 requires cities to address the housing need “at a level that calibrates with the jurisdiction’s identified affordability gap for those households.” The policy directive in H-1 does not recognize the economic segmentation within King County and establishes a single standard for providing affordable housing. According to table H-2, SKC cities provide an average of five times the amount of housing affordable to those making 30-50 area median income (AMI) as compared to EKC cities, and an average of four times the amount of housing affordable to those making 50-80AMI. Consequently, policy H-1 has the effect of increasing the affordable housing in SKC under the auspices of filling an “identified gap”, instead of focusing on the creation of affordable housing where it is currently most needed.

Development feasibility affects the likelihood of construction across or between submarkets. Seattle and EKC rents naturally support market-rate unit construction at, or more than, 100AMI. Consequently, Seattle and EKC cities need to be supported in meeting levels of affordability not well represented in their communities (e.g. extremely low-, low-, and moderate-income households) and at a level that is commensurate with the wealth also consolidated within their borders.

Recommendation No. 1:
Draft policy H-1 should result in those cities where housing is affordable only to those people making more than 80AMI being required to increase their affordable units to cover a higher percentage of the countywide need. In other words, cities should be directed to address the housing need “at a level that calibrates with the jurisdiction’s identified wealth” and help turn the tide on the geographic inequality currently seen in the region.

In SKC, EcoNW analysis\(^1\) estimates that current rents are often not high enough for podium developments (a product type indicative of market-rate construction, that is also essential to other policy goals related to transit-oriented development and efficient use of land) to be feasible and cover the cost of construction in many parts of the subregion. Rents will need to increase considerably before this construction type, commonly found through other areas of the region, is financially feasible throughout SKC.

There have been decades of delay for SKC cities between the planning/zoning being in place for center-focused growth and transit-oriented development and the desired units coming online. This delay is

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\(^1\) https://econw.shinyapps.io/south-kc-policy-analysis-tool/
representative of the trepidation the development community has shown in investing in more urban, market-rate products within somewhat suburban market contexts.

For this reason, SKC cities need to be supported in (1) preserving the affordable units in our communities today (mostly in the 30-80% AMI range, whether regulated or NOAHs), (2) attracting market-rate development to provide options across the full income spectrum, and (3) the siting of extremely low-income housing, permanent supportive housing, or other transitional types of housing only in such a way that does not concentrate poverty.

To be explicit, the median household incomes in Seattle and the EKC cities are as follows:

- Seattle: $92,263
- Sammamish: $174,003
- Kirkland: $117,190
- Bellevue: $120,456
- Redmond: $132,188
- Mercer Island: $147,566
- Lake Forest Park: $126,750
- Snoqualmie: $145,580
- **Average**: $119,500

In comparison, the median household incomes in SKC are:

- Kent: $72,062
- Tukwila: $58,097
- Federal Way: $67,347
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- Renton: $77,739
- SeaTac: $63,009
- Des Moines: $70,222
- **Average**: $68,588

**Recommendation No. 2:**
SKC cities should not be directed to contribute as much extremely low-income housing as Seattle and EKC cities, when SKC is the only area where low- and moderate-income people can afford to live today; directing them to do so will exacerbate the disparities of our region. For SKC cities to be healthy, thriving, desirable places to live, the SKC cities and region should focus on preservation of units affordable today, and the focus on levels of affordability needs should be expanded to include market-rate units.

Efficiency and Inequity
Local and regional governments generally focus on ensuring that the public interest is furthered using the most efficient means (i.e. lowest monetary cost) available. The current draft CPPs encourage the efficient use of land to address a wide variety of public goals (e.g., not just affordable housing, but all kinds of development and infrastructure). However, efficiency can also result in unintended consequences, including disparate impacts on BIPOC communities. Land values in South King County are generally lower, which results in South King County being a very “efficient” location to acquire land for public facilities...
serving a countywide need. This appears to have resulted in a trend of concentrating subsidized housing, correctional facilities, homeless shelters, and other critical infrastructure.

Additionally, since land values are also the basis for property tax revenues, and sales tax revenues are directly related to a community's wealth, SKC cities have a reduced ability to provide key services for residents and cannot invest in the same access to opportunity that residents in wealthier communities enjoy. Inequitable resource distribution also extends beyond housing; it relates to public facilities—such as well-maintained parks, complete and connected pedestrian and bicycle facilities, high performing schools etc.—obvious examples of the kind of cyclical disinvestment that plagues historically disadvantaged communities.

The results of a focus on efficiency and the funding sources for local jurisdictions to invest in their community are predictable. By continuing to concentrate affordable housing in the area with the fewest resources, to meet the needs of the community served, the region will perpetuate current inequities.

Recommendation No. 3:
To ensure that the region does not perpetuate, or exacerbate, existing inequities in SKC, the CPPs must acknowledge that the efficient use of resources cannot be the primary driver for the creation of affordable housing.

Regional Collaboration
The draft CPPs identify several challenges facing the region that should be addressed through countywide collaboration between local jurisdictions and regional organizations. The draft CPPs acknowledge the need for countywide collaboration and establish a proposed framework to ensure that regional solutions are "done with" and not "done to" a local jurisdiction. However, the draft CPPs do not contain sufficient detail to ensure collaboration with local jurisdictions.

Recommendation No. 4:
The draft CPPs should be amended further to establish a framework for regional collaboration that ensures affected local jurisdictions have a meaningful ability to engage in regional policy decision-making, and in decisions affecting their communities.

Another point of concern for the undersigned cities is within the Growth Targets section. Not all communities have accepted growth targets that align with planned transportation investment. The region has intentionally directed the most significant investment to communities with Regional Growth Centers. Any community that has been identified as receiving a light rail line, the most expensive transit investment, should have a growth target that is at least reasonably commensurate with the transportation investment. SKC cities anticipating light rail have accepted growth targets that closely align with planned investment.

Recommendation No. 5:
We urge GMPC to look for significant outliers that have not accepted growth targets within or very close to the ranges provided.

In Closing
The undersigned cities share and support the regional goals expressed in the draft CPPs to take meaningful steps to: A) correct inequities facing BIPOC communities; and B) provide housing for all economic
segments of the community. The preceding comments are intended to ensure that policy objectives articulated in the draft CPPs are in fact accomplished, with intended outcomes for healthy, thriving, affordable, mixed income communities, by incorporating a more intersectional understanding of the cyclical and overlapping effects of County decisions on the area that serves the most identified needs today: South King County.

Sincerely,

Jim Ferrell
Mayor

cc: Federal Way City Council
Growth Management Planning Council  
C/O Karen Wolf FAICP, Senior Policy Analyst  
Performance, Strategy, and Budget  

VIA EMAIL ONLY: GMPC@KingCounty.gov

RE: DRAFT 2021 King County Countywide Planning Policies

Dear Growth Management Planning Council,

This letter provides comment from the undersigned cities on the Draft 2021 King County Countywide Planning Policies (CPPs). The cities appreciate and support the regional goals and policy approach reflected in the CPPs. In particular, the CPPs acknowledge the historic inequities and current disadvantages faced by the Black, Indigenous, and Persons of Color (BIPOC) communities and provide a clear basis for the region to prioritize funding and resource distribution to these communities. The CPPs also acknowledge and provide a policy basis to address the growing regional challenges in meeting the Growth Management Act (GMA) mandate to make “...adequate provisions for existing and projected needs of all economic segments of the community (RCW 36.70A.070(2)).”

Summary

In light of these shared goals, the draft CPPs should be further amended to address the following:

- Regional affordable housing:
  - Recognition that the undersigned cities host a large percentage of the region’s affordable housing and should not be held to the same standards in constructing new affordable housing as other regions of King County.
  - Affordable land prices are leading to the placement of a disproportionate share of regional facilities with negative externalities (e.g. transfer stations, jails, behavior health facilities homeless shelters etc.) in South King County.

- Efficiency and inequity: Assurance that seemingly impartial standards like "efficiency" will not be used to perpetuate historical patterns of unequal access to opportunity for BIPOC communities in South King County cities.

- Regional collaboration: Recognition that regional challenges should be addressed through a well-defined collaborative process.

Regional Affordable Housing

The undersigned cities in South King County (SKC) represent communities that are predominantly BIPOC. The vast majority of “naturally occurring” affordable housing (NOAHs) in King County is found in our communities, and we are working to preserve this affordable housing stock. The SKC cities have long recognized their role in providing a key resource to King County residents looking for an affordable...
alternative to the unattainable prices found throughout Seattle and East King County (EKC). In fact, many of the undersigned cities have undertaken the preparation of a Housing Action Plan (RCW 36.70A.600(2)), which has resulted in increased analysis of the affordable housing problems facing King County. Many SKC cities’ housing units consist almost entirely of NOAHs, and for some SKC cities, a quarter or more of their multifamily housing stock is subsidized. This situation is not well represented or adequately addressed in the draft CPPs.

Draft CPP policy H-1 requires cities to address the housing need “at a level that calibrates with the jurisdiction’s identified affordability gap for those households.” The policy directive in H-1 does not recognize the employment income variations within King County and establishes a single standard for providing affordable housing. SKC cities provide an average of five times the amount of housing affordable to those making 30-50 area median income (AMI) and an average of four times the amount of housing affordable to those making 50-80AMI, as compared to EKC cities. Consequently, policy H-1 has the effect of increasing the affordable housing in SKC under the auspices of filling an “identified gap”, instead of focusing on the creation of affordable housing where it is currently most needed.

Development feasibility affects the likelihood of construction across or between submarkets. Seattle and EKC rents naturally support market-rate unit construction at, or more than, 100AMI. Consequently, Seattle and EKC cities need to be supported in meeting levels of affordability not well represented in their communities (e.g. extremely low-, low-, and moderate-income households) and at a level that is commensurate with the job earnings also consolidated within their borders.

Recommendation No. 1:
Draft policy H-1 should result in those cities where housing is affordable only to those people making more than 80AMI being required to increase their affordable units to cover a higher percentage of the countywide need. In other words, cities should be directed to address the housing need “at a level that calibrates with the jurisdiction’s identified median income” and help turn the tide on the geographic inequality currently seen in the region.

In SKC, EcoNW analysis\(^1\) estimates that current rents are often not high enough for podium developments (a product type indicative of market-rate construction, that is also essential to other policy goals related to transit-oriented development and efficient use of land) to be feasible and cover the cost of construction in many parts of the subregion. Rents will need to increase considerably before this construction type, commonly found through other areas of the region, is financially feasible throughout SKC.

There have been decades of delay for SKC cities between the planning/zoning being in place for center-focused growth and transit-oriented development and the desired units coming online. This delay is representative of the trepidation the development community has shown in investing in more urban, market-rate products within somewhat suburban market contexts.

For this reason, SKC cities need to be supported in (1) preserving the affordable units in our communities today (mostly in the 30-80AMI range, whether regulated or NOAHs), (2) attracting market-rate development to provide options across the full income spectrum, and (3) the siting of extremely low-income housing, permanent supportive housing, or other transitional types of housing only in such a way that does not concentrate poverty.

\(^1\) https://econw.shinyapps.io/south-kc-policy-analysis-tool/
To be explicit, the median household incomes in Seattle and the EKC cities are as follows:

- Seattle: $92,263
- Sammamish: $174,003
- Kirkland: $117,190
- Bellevue: $120,456
- Redmond: $132,188
- Mercer Island: $147,566
- Lake Forest Park: $126,750
- Snoqualmie: $145,580
- **Average: $119,500**

In comparison, the median household incomes in SKC are:

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**Efficiency and Inequity**
Local and regional governments generally focus on ensuring that the public interest is furthered using the most efficient means (i.e. lowest monetary cost) available. The current draft CPPs encourage the efficient use of land to address a wide variety of public goals (e.g., not just affordable housing, but all kinds of development and infrastructure). However, efficiency can also result in unintended consequences, including disparate impacts on BIPOC communities. Land values in South King County are generally lower, which results in South King County being a very “efficient” location to acquire land for public facilities serving a countywide need. This appears to have resulted in a trend of concentrating subsidized housing, correctional facilities, homeless shelters, and other critical infrastructure.

Additionally, since land values are also the basis for property tax revenues, and sales tax revenues are directly related to a community’s wealth, SKC cities have a reduced ability to provide key services for residents and cannot invest in the same access to opportunity that residents in wealthier communities enjoy. Inequitable resource distribution also extends beyond housing; it relates to public facilities — such as well-maintained parks, complete and connected pedestrian and bicycle facilities, high performing
schools etc.— are examples of the kind of cyclical disinvestment that plagues historically disadvantaged communities.

A focus on efficiency, combined with the funding sources for local jurisdictions to invest in their community, results in a predictable outcome. By continuing to concentrate affordable housing in the area with the fewest resources to meet the needs of the community served, the region will perpetuate current inequities.

**Recommendation No. 3:**
To ensure that the region does not perpetuate, or exacerbate, existing inequities in SKC, the CPPs must acknowledge that the **efficient use of resources cannot be the primary driver for the creation of affordable housing and other public facilities.**

**Regional Collaboration**
The draft CPPs identify several challenges facing the region that should be addressed through countywide collaboration between local jurisdictions and regional organizations. The draft CPPs acknowledge the need for countywide collaboration and establish a proposed framework to ensure that regional solutions are “done with” and not “done to” a local jurisdiction. However, the draft CPPs do not contain sufficient detail to ensure collaboration with local jurisdictions.

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**In Closing**
The undersigned cities share and support the regional goals expressed in the draft CPPs to take meaningful steps to: A) correct inequities facing BIPOC communities; and B) provide housing for all economic segments of the community. The preceding comments are intended to ensure that policy objectives articulated in the draft CPPs are in fact accomplished, with intended outcomes for healthy, thriving, affordable, mixed income communities, by incorporating a more intersectional understanding of the cyclical and overlapping effects of County decisions on the area that serves the most identified needs today: South King County.

Regards,
Mayor, City of Federal Way

Mayor, City of Kent

Mayor, City of Renton

Mayor, City of SeaTac

Mayor, City of Tukwila
Dear Ms. Wolf and Mrs. Maskin,

Thank you for the opportunity for the Shoreline staff to comment on the Draft King County Countywide Planning Policies (CPP’s) and the Draft Urban Growth Capacity Study (UGCS).

Shoreline staff have had an opportunity to review the CPP’s and the UGCS and have provided comments below. Comments have been organized by Chapter of the CPP’s and the UGCS as a whole.

CPP’s –

**General Policies** – no comments

1. **Development Patterns**

   DP-6 states: Plan for development patterns Adopt land use and community investment strategies that promote public health and address racially and ethnically disparate health outcomes and promote access to opportunity by providing Provide all residents with opportunities for employment, safe and convenient daily physical activity, social connectivity, and protection from exposure to harmful substances and environments, and housing in high opportunity areas.

   Perhaps the addition of employment does not belong in this policy. For example, not ALL residents are of working age. Also, what does it mean for government to provide ALL residents with opportunities for employment? In general, DP-6 seems to be scaled to neighborhoods. As written, the policy seems to indicate a commitment to provide ALL residents with employment in their socially connected, environmentally safe neighborhood. Is that the policy? Or is the policy intending to create opportunity all people who want to work to obtain safe employment close to home or have safe, reliable, affordable, environmentally sustainable transportation to and from work?
DP-13 - Thank you for the refinement of DP-13(d) regarding local water, sewer, transportation, and other infrastructure plans needing to be consistent with the adopted growth targets. Implementation of this policy is essential to accommodate planned growth throughout the region. One suggestion would be to add power to the list. We are experiencing a disconnect between electric service provision and planned densities in Shoreline especially in the light rail Station Areas.

Table DP-1 – Draft King County Jurisdiction Growth Targets 2019-2044

On February 8, 2021, Shoreline’s City Council received a joint briefing from King County regarding preliminary housing and job target allocations for Shoreline. The purpose of this meeting was to receive Council feedback on the proposed allocations. The allocations presented were a range of 5,179-11,405 housing units and 2,347-9,438 jobs. Council indicated a general acceptance for the range of housing units presented as a target. Council questioned the high end of the range for jobs based on the City not being able to achieve the current target of 5,000 jobs. At the end of the meeting, the Council seemed to support both a housing and jobs target up to the high end of the ranges.

The updated draft growth targets include an allocation of 13,000 new housing units and 10,000 new jobs for Shoreline, both units higher than previously discussed. Council and staff agree that the land/zoning capacity exists to support the updated draft housing and jobs targets. Shoreline is however interested in assurance that if these targets are not met, despite proactive planning and policy support for sufficient capacity, that Shoreline will not be penalized.

Additionally, in the pursuit of balancing jobs and housing, those communities that have the ability to attract and exceed job targets may also have a duty to accept more housing growth to balance the equation.

DP-40 - This policy seems out of place. The new language makes the policy about multi modal transportation when the policies before and after are about historic preservation. Perhaps, reorder the policies.

2. Economy

No comments.

3. Environment

New policy EN-12 refers to reducing air, noise, and light pollution from hazards. We are not sure what would be considered hazards in this context.

New policy EN-24 “Preserve and restore native vegetation and tree canopy, especially where it protects habitat and contributes to overall ecological function” is open ended as to where preservation and restoration is to occur and to what degree. It is not possible to preserve and fully restore ALL native vegetation and tree canopy while accommodating growth. The policy
as written does not recognize the impact of growth. New policy EN-27 adds the qualifier “where appropriate and feasible” for example recognizing that full restoration may not always be possible. Also, what habitat is being protected? Many residents will interpret a policy like this as a mandate to preserve AND restore ALL native vegetation and tree canopy. Would they be wrong in their reading of the policy? Would the City not be upholding EN – 24 by allowing the removal of some native vegetation and tree canopy in Shoreline for growth and then requiring purchase of TDRs in the County for example? Perhaps change “preserve” to “protect” which is used in EN-38.

4. Housing

The “Housing Overarching Goal” may be misleading as worded. The goal is to “Provide a full range of….“. Provide means “to supply; to furnish”. The MPP-H-Goal paired with this Overarching Goal in the 2021-CPP Matrix uses the action word “Plan” instead of “Provide”. Shoreline staff recommend changing “Provide” to “Plan for”.

H-3 – The collection of the data required in this policy will require staff and research funding. If the County has funding to collect this data or a portion of this data uniformly for applicable King County jurisdictions that would be of great assistance and result in more comparable results.

H-3(B) what is meant by “occupants per room”? Is this metric the IBC and IRC square footage per occupant standard? Or the general application of the definition of a family? Or a standard 2.2 occupants per household? Or an actual (not estimated) unit by unit assessment of all the people living in a unit? Regardless, this seems like a difficult metric to calculate and to what end?

New H-23 refers to monitoring progress of people being able to live in neighborhoods of their choosing. How do we know which neighborhoods are neighborhoods of choice? Or is it simple for a City like Shoreline, where all neighborhoods are of choice?

H-23(e) We are not sure how this data would be collected. If the County would be compiling this data and the City compiles H-23(c) that would be workable. Otherwise, the City would need resources and assistance to implement this policy.

5. Public facilities

No Comments.

6. Transportation

T-4 – The proposed amendment refers to “community engagement processes” where it seems more appropriate to rephrase the amendment read: “Develop station area plans for high-capacity transit stations and mobility hubs based on input received through community engagement.”

T-6 – The amendment to the end of this policy is unclear and could be rephrased to read: “…private developments to create a safe and inviting experience for transit users to encourage ridership countywide.”
T-11 – The policy deals with freight mobility strategies and references an intent to minimize community impacts but does not elaborate. An example or additional detail would assist in implementing this policy.

T-X12 – This new policy promotes road and transit facilities to be well designed and safe for pedestrians and bicyclists. The phrase “where feasible” should be removed from this policy as well designed and safe facilities should occur as a standard and not only where feasible.

General comment. Staff appreciate the leadership the GMPC is providing with updated policies that set the stage for change in Black, Indigenous, and other communities of color and immigrant communities. The City of Shoreline looks forward to updating its local policies to advance this leadership.

Appendices

A review of Appendix 6: DRAFT Centers Designation Framework reveals an opportunity for Shoreline to apply to be designated as an Urban Growth Center. This type of a designation has been a Comprehensive Plan Goal for several years. The City did not qualify using the existing criteria.

Urban Growth Capacity Study

The Urban Growth Capacity Report (UGCS) is King County’s buildable lands report. King County is a Growth Management Act (GMA) jurisdiction and must plan to accommodate projected growth within its boundaries, with most growth focused into urban growth areas (UGAs) where urban services are available or can be made available.

The UGCS was prepared in tandem with King County and includes data and analysis development in a partnership between City of Shoreline staff and staff from King County. The UGCS for Shoreline has changed greatly from past studies due to several large-scale transportation and land use projects that will help shape land use patterns in Shoreline for decades to come.

The three key components of King County’s Buildable Lands Program which are required under RCW 36.70A.215 and WAC 365-196-315 are:

1. Analysis of countywide and jurisdictional growth trends between 2006 and 2018 compared to 2035 CPP targets.
2. Analysis of achieved densities by jurisdiction based on growth that occurred between 2012 and 2018.
3. Capacity for housing and job growth over the next 20 years.

Shoreline grew relatively slowly between 2006 and 2018, adding approximately 1,529 dwelling units to the City. The annual growth rate for dwelling units is .57% per year between 2006 and 2018 which is below the growth rate needed for Shoreline to meet Shoreline’s 2035 housing target goals.

Shoreline has mostly met achieved densities goals established by the last Buildable Lands Report in 2012. Most interesting is the achieved density in the high density mixed-use and commercial zones of an average of 108 units per acre. These high-density zones are where Shoreline has seen the most units of new housing (1,639 units since 2012).
Shoreline, through Council’s adoption of the 145th and 185th Street Station Subarea Plans, has the capacity for housing and job targets through 2044. The UGCS states the city has the capacity for 25,000 units throughout all zones and 20,000 units in the commercial/mixed-use zones of the City.

Employment growth has been slow with the City adding only 487 jobs between 2006 and 2018. The City has added capacity in the Station Subareas which will accommodate approximately 4,300 jobs throughout the 25-year reporting period. Shoreline has the capacity for 4,456 jobs citywide which is well under the City’s allocation of jobs in the revised CPP’s (10,000 jobs).

Thank you again for your consideration of Shoreline’s comments on the CPP’s and the UGCS. Please feel free to reach out to Steve Szafran, Senior Planner at sszafran@shorelinewa.gov or (206) 801-2512 if you have any further questions.

Sincerely,

*Rachael Markle*

Rachael Markle, AICP  
Director, Planning and Community Development  
(206) 801-2531
To: Growth Management Planning Council  
From: Friends of Black Diamond  
Subject: Comment on 2021 Draft Countywide Planning Policies and Growth Targets

We recognize that the growth target setting process for our Puget Sound Region that happens every 8 years has a significant effect on how we invest our shared public dollars.

Thank you for the ability to see the draft and comment before final decisions are made.

Some of us have lived in the Black Diamond area for decades and some are new. We understand there are tradeoffs to living in such a remote area. Our environment features healthy forests and farms, and it is dark and quiet at night. In return for this relative tranquility, we deal with limited employment opportunities and services, and longer commutes to employment, shopping, health care and other services. That’s the tradeoff we freely make by choosing to live here.

The rapid growth of recent years has made that tradeoff increasingly untenable. Black Diamond approved a Master Planned Development (MPD) of over 6,000 units plus commercial space that would quadruple our town. While Black Diamond’s new development has made some contributions to roads, schools, water and sewer, these contributions have fallen far short of the need. After stirring up support among elected officials for promises of employment, shopping, health care and other services to our community, the new development has made virtually no investment in these things. New development is “using up” the limited capacity of State Highway 169, our city hall/public works buildings, regional water, and sewage treatment services. School Districts are unfairly positioned to ask voters for unsupportable bond levies. Fire and police services are not seeing the sustained revenue flows that they need to keep up with demand for services. The list goes on.

We hope that this letter will provide insight into the nature of this part of King County, and why the Puget Sound Regional Council recently advised the City of Black Diamond that its growth planning is inconsistent with regional growth targets. (Feb. 27, 2020 PSRC Black Diamond Comprehensive Plan conditional certification).

PSRC also identified a major false assumption in the transportation analysis for Black Diamond’s Comprehensive Plan. Despite the existence of only two lanes on our busiest road, State Route 169, the analysis assumed additional lanes but did not identify funding or
projects to build these lanes. This effectively rendered the rest of the analysis – the traffic
distribution and future road projects needed – meaningless.

Twenty-five years ago, King County made a decision to allow Black Diamond to annex vast
areas around the City that were owned by the Palmer Coking Coal and Plum Creek Timber
companies. At that time the expected number of housing units were about 1,500 and a
commercial area was not expected. Also at that time, it was believed that setting aside
riparian buffers as open space and preserving some open space outside the city (Black
Diamond Open Space Agreement) would compensate for increasing development potential.

In 2010, fifteen years after that decision, Black Diamond approved an MPD with an
estimated number of housing units of 6,050, and a commercial area of 1,100,000 square feet
which is about the size of six large wal-marts. To date, only about 500 units of housing and
no commercial has been built.

Five years from now, Black Diamond’s MPD approvals will be up for expiration or renewal
(Black Diamond Code 18.98.195). At that time, the City will have the authority to downsize
and modify the development and its conditions of approval. Revocation is also a legal
possibility (18.98.200) given transportation concurrency failures already encountered 300
units into the MPD’s construction, or any other failure to meet development requirements.
See Appendix B: Black Diamond Municipal Code MPD expiration and revocation.

It is important that the Growth Management Planning Council take steps now to prepare for
a major re-evaluation of the City of Black Diamond’s growth and development trajectory.
This evaluation should be done in cooperation with the Cities of Maple Valley and
Covington, who themselves are dealing with the challenges of growth that is bumping up
against regional infrastructure limits. Additionally, the region’s investment in the farm and
forest economies of the Green River Valley and Enumclaw Plateau is at risk if growth
decisions in Black Diamond lead to levels of taxation for schools that exceed local financing
capabilities.

Any evaluation of growth targets for Black Diamond and the Enumclaw Plateau should be
informed by the relatively high costs of upgrading public infrastructure to levels that are
usually required only in urban core areas.

The massive and unsustainable Black Diamond MPD is an anachronism of the past century
when setting aside open space seemed like the only available and necessary mitigation for a
sprawl that was promoted by timber and mining companies.
We residents of Black Diamond, joined by others throughout King County, believe that land development should provide housing, transit, employment, shopping and public services to equitably serve an economically and socially diverse population. We have all come to see that growth management decisions made in the last century do not reflect the needs and values of our current times.

When the Black Diamond MPD was approved, requirements for affordable housing, employment, transit, and public service concurrency were weak. Worse, these requirements so far have not been enforced.

**Equity and Affordability**
Some of the negative impacts of inappropriate growth affect the community equally, but some growth issues are harder on those who have less.

Affluent residents often have opportunities to work from home and take paid personal time off. Poorer residents who may have found a more affordable home in Black Diamond are finding that they have longer and longer commutes. As this commute gets slower, these residents have less time to meet family needs at home. Without frequent and sufficient mass transit, lower income households must rely on often less reliable vehicles that fare poorly in long traffic delays.

If roads are overwhelmed, those who live next to the roads endure more traffic noise, air pollution and light pollution. In Black Diamond most of our through-town roads contain older more affordable homes. In addition to the environmental impacts, the traffic increase is causing them to lose value, possibly trapping residents in homes worth less than they paid for them or that they cannot sell for enough money to afford to move.

Some of Black Diamond’s existing affordable housing stock was developed along rural standard roads. As these roads are widened to meet urban standards, this housing will be lost, or reduced in livability and value.

This problem has been exacerbated by Black Diamond’s Ten Trails/OakPointe MPD because the developer has designed their development to funnel commuters onto existing in-town roads and reduce pass-through traffic through their own development. This has effectively “exported” traffic impacts away from their property and on to publicly owned roads.

Local residents will also be negatively impacted by the reduction of good job opportunities as formerly light industrial zones are rezoned and redeveloped for housing. This new
housing, in turn, will not generate sustained revenue flows to support public services, especially schools. Higher taxes for schools always follows rapid development, and these higher taxes affect lower income residents disproportionately.

There has been some recent consideration to adding commercial strip mall zoning as a way to bolster City coffers and create jobs. Unfortunately the traffic impact analysis clearly shows this would exacerbate transportation issues, and strip malls and coffee shops will not create family wage jobs. It is worth noting that nearby Covington, which has been trying to grow its tax and job base for years struggles with the issue of family wage jobs. From Covington’s current website:

The city’s major employers are in retail, health care, and the public sector. Many local residents commute out of the area for high wage jobs. The area’s largest employer is the Kent School District, followed by Wal-Mart, Multicare Health System, Fred Meyer and Costco. Others include Home Depot, Kohl’s, Safeway, City of Covington, Valley Medical and Petco. ([https://www.covingtonwa.gov/ed/industry.php](https://www.covingtonwa.gov/ed/industry.php))

Black Diamond’s existing housing stock in the older parts of town has many affordable options. A new draft 2021 Black Diamond Housing Action Plan cited the imbalance of affordable housing options caused by the rapid construction of higher priced housing in the Ten Trails development. Since the Ten Trails development has not complied with numerous policies and requirements to provide for the City’s future affordable housing needs, pressure is being exerted to redevelop older areas of the city to provide lower income housing. It is sadly ironic that the very areas in town that currently provide affordable housing will be burdened by the impacts of growth and then displaced by new projects to mitigate the low income housing imbalance caused by the Ten Trails MPD. It would be much more equitable and fair for these new affordable housing projects to be built within the MPD. The Developers’ profit goals should not be allowed to export affordable housing obligations in the same way that they are exporting their traffic management obligations.

**Multi-Modal Transportation, Health , and Safety**

Communities throughout King County are experiencing similar growth and development impacts, but in Black Diamond, these impacts are magnified by local conditions. Created over 100 years ago, many neighborhoods were located to have ready access to coal mining operations. When the coal mining operations ceased, new neighborhoods and commercial buildings continued to be built in a haphazard fashion in pockets near the once sprawling mining facilities. These pockets of development are now 100% automobile dependent with no provisions for pedestrian usage.

pg. 4 of 6
Back when development and traffic were at rural standards, narrow shoulders and relatively quiet roads allowed for at least some pedestrian and bicycle use. But as these roads started to accept urban levels of traffic, at often very high speeds, pedestrians and bicyclists have been literally driven off the road with no reasonable options available to them. One has only to walk along the City arterials during rush hour to see the severity of this problem. See Appendix D Pedestrians and Bikes in Black Diamond.

The City has been slow to respond to the lack of pedestrian facilities to serve rapid development of the MPD. Considerable grant money has been received from the State of Washington, but few facilities have been built, and these have largely been in the historic district to promote tourism or directly connected to the MPD to meet developer obligations. None of the money has gone to accommodate non-automotive use along the City’s sprawling substandard highways and arterials. A recent reconfiguration of the major intersection in town, SR169 and Roberts Drive, had absolutely no provision whatsoever for pedestrians. This intersection is close to the City’s provider of low income services, the Black Diamond Community Center, and is the City’s major hub... but no pedestrian access was provided in a project that was completed just weeks ago.

Black Diamond has a single transit route on one road that runs infrequently; see Appendix C Metro Transit in Black Diamond. This route is little-used, with buses frequently empty. Bus stops are mere signs next to a busy highway; unsafe and without pedestrian crossings or protection. The cost of additional transit is not budgeted and transit to Black Diamond will not compete financially with the benefits of putting our regional transit dollars in our existing high capacity transit communities.

Environment
The environmental challenges of Black Diamond are also especially severe. Virtually none of the coal mining sites have been rehabilitated according to Federal requirements. A legacy of potential sinkholes, gas releases, mine tailings and industrial pollution pockmark the entire community. Major investments are needed to upgrade the city’s century old waterline systems, but this has been slow and haphazard with no clearly identified plan. Recently, complaints have been made to the Department of Ecology about sediment pollution caused by road projects that should have had modern stormwater mitigation measures but did not. The area has excellent open space and wildlife resources, but these are not inventoried or monitored, much less properly managed. The City has not participated with King County’s conservation programs.

Planning and Growth Targets
The challenge of managing what would be the largest development at build-out in the history of King County has overwhelmed our government institutions and community.

It is critical that the Growth Management Planning Council reassess the conditions on the ground in this part of King County. This reassessment must include a realistic financing and infrastructure capacity analysis of SE King County. Black Diamond’s unsustainable growth ambitions must be weighed against the mitigations that are necessary to cope with existing development and projects in the pipe line in Maple Valley and Covington. As this analysis and planning effort is being undertaken, Black Diamond must not exacerbate the current problem. Unfortunately, it seems poised to do just that as it considers a large rezone. The new rezone would add a 31 acre strip mall that would dump its traffic onto two lane roads that have no project or developer commitment to widen them, and are will be beyond full capacity with the existing Master Planned Development build out alone.

From a regional perspective, we must stop subsidizing development in our fringe cities. After many years of suburban car-centered development in southeast King County, a serious effort needs to be made to reduce development, infrastructure, and transportation costs on the fringes of King County’s urban growth boundary. Housing density and employment centers must be supported first in existing growth centers.

We request that the Growth Management Planning Council reduce the growth targets for Black Diamond. A target of about 1,000 additional housing units to be constructed mostly within the existing Ten Trails Master Planned Development (MPD) is better aligned with job targets, and will result in much smarter infrastructure spending. This is also supported by Multi-County Planning Policies copied into Appendix A.

Thank you,

Friends of Black Diamond
care of Gary Davis
P.O. Box 223
Black Diamond, WA 98010

FriendsOfBlackDiamond@Comcast.net
Appendix A Related Multi-County Planning Policies

Appendix A - Supportive Multi-County Planning Policies

MPP-RGS-4. Accommodate the region's growth first and foremost in the urban growth area. Ensure that development in rural areas is consistent with the regional vision and the goals of the Regional Open Space Conservation Plan.

H-Action-1. Regional Housing Strategy: PSRC, together with its member jurisdictions, state agencies, housing interest groups, housing professionals, advocacy and community groups, and other stakeholders will develop a comprehensive regional housing strategy to support the 2024 local comprehensive plan update. The housing strategy will provide the framework for regional housing assistance (see H-Action-2, below) and shall include the following components:

- In the near term, a regional housing needs assessment to identify current and future housing needs to support the regional vision and to make significant progress towards jobs/housing balance and quantify the need for affordable housing that will eliminate cost burden and racial disproportionality in cost burden for all GMPC approved economic segments of the population, including those earning at or below 80 percent of Area Median Income throughout the region. This will provide necessary structure and focus to regional affordable housing discussions
- Strategies and best practices to promote and accelerate: housing supply, the preservation and expansion of market rate and subsidized affordable housing, housing in centers and in proximity to transit, jobs-housing balance, and the development of moderate-density housing options
- Coordination with other regional and local housing efforts.

MPP-PS-3. Time and phase services and facilities to guide growth and development in a manner that supports the Regional Growth Strategy vision.

MPP-PS-5. Do not provide urban services in rural areas. Design services for limited access when they are needed to solve isolated health and sanitation problems, so as not to increase the development potential of the surrounding rural area.

MPP-PS-6. Encourage the design of public facilities and utilities in rural areas to be at a size and scale appropriate to rural locations, so as not to increase development pressure.

MPP-PS-2. Promote affordability and equitable access of public services to all communities, especially the historically underserved. Prioritize investments to address disparities.

MPP-EC-19. Recognize the need for employment Support economic activity and job creation in cities in the rural areas at a size, scale, and type compatible with
Appendix A Related Multi-County Planning Policies

des communities and promote compatible occupations (such as, but not limited to, tourism, cottage and home-based businesses, and local services) that do not conflict with rural character and resource-based land uses. MPP-EC-23 Support economic activity in rural and natural resource areas at a size and scale that is compatible with the long-term integrity and productivity of these lands.

MPP-T-22. Avoid construction of major roads and capacity expansion on existing roads in rural and resource areas. Where increased roadway capacity is warranted to support safe and efficient travel through rural areas, appropriate rural development regulations and strong commitments to access management should be in place prior to authorizing such capacity expansion in order to prevent unplanned growth in rural areas.

MPP-T-15. Prioritize investments in transportation facilities and services in the urban growth area that support compact, pedestrian-and transit-oriented densities and development.

MPP-T-8. Strategically expand capacity and increase efficiency of the transportation system to move goods, services, and people consistent with the Regional Growth Strategy to and within the urban growth area. Focus on investments that produce the greatest net benefits to people and minimize the environmental impacts of transportation.
Appendix B Black Diamond Municipal Code 18.98 Development Agreement Expiration and Revocation

18.98.195 Vesting.
A. Except to the extent earlier terminated, modified by the provisions of this chapter or as otherwise specified in the conditions of approval, the MPD permit approval vests the applicant for fifteen years to all conditions of approval and to the development regulations in effect on the date of approval.
B. Vesting as to stormwater regulations shall be on a phase by phase basis.
C. Vesting as to conditions necessary to meet the fiscal impacts analysis criteria required by Section 18.98.060(B)(6)(c) shall only be for such period of time as is justified by the required updated analysis.
D. Building permit applications shall be subject to the building codes in effect at the time a building permit application is deemed complete.
E. The council may grant an extension of the fifteen year vesting period for up to five years for any phase so long as the applicant demonstrates with clear and convincing evidence that all of the following are met:
   1. The phase approval has not been revoked in accordance with the provisions of Section 18.98.200;
   2. The failure to obtain the implementing entitlement approval for the applicable phase is a result of factors beyond the applicant’s control;
   3. The granting of an extension will not adversely impact any of the purposes or public benefit provisions of this chapter; and
   4. The city has not adopted ordinances of general application that impose a more stringent development standard than those in effect for the phase for which a time extension is requested or in the alternative, the applicant agrees to comply with the more stringent standard.

Any request for an extension shall be considered as a major amendment to the MPD. The council may impose such additional conditions to the phases as it deems appropriate to further the purposes and public benefit objectives of the MPD code in light of the number of years that have passed since the original MPD permit approval and taking into consideration the effectiveness of the existing permit conditions in meeting those purposes and public benefit objectives.

18.98.200 Revocation of MPD permit.

The city council may amend or revoke any or all conditions of MPD approval, after public hearing and notice under the following circumstances:
A. If the MPD permit allowed for phasing and the implementing action (i.e., final plat approval, site plan approval, etc.) for the development of the next phase has not been approved within five years of the approval of the previous phase in the case of the first phase, from the original MPD approval and an extension of said phase has not been previously granted. An extension may be granted for up to an additional two years on such additional conditions as the council determines are necessary in order to assure that the extension does not adversely impact the intent and purpose of the initial MPD approval.
B. A condition of the MPD approval has been violated and the violation has not been corrected after sixty days notice of the violation unless said violation can be corrected through the use of a duly posted performance or maintenance bond provided at the time of MPD approval.
C. A violation of an MPD condition of approval that cannot be corrected, such as the destruction of wetlands or removal of trees and vegetation that was specifically prohibited and cannot be restored to their original state within sixty days.
D. The MPD permit has been approved for more than five years and the city council finds that further development will present a threat to the public health, safety and welfare unless the amendment or revocation is implemented; provided, however, the city shall first determine that the condition cannot be amended in order to eliminate the threat to the public health, safety or welfare before it revokes the permit approval.

The above provisions notwithstanding, the vacation and/or amendment of the MPD approval shall not affect previously approved building permits.
E. If the MPD permit is revoked for undeveloped phases, the parcels for which the permit is revoked cannot be developed without a new MPD permit being obtained, even if the revoked parcels are less than the minimum acreage required by Section 18.98.030.

(Ord. No. 897, § l(Exh. A), 4-16-2009)
Appendix C Metro Transit In Black Diamond
Southeast King County Transit map – Black Diamond would be in lower right, but is so far southeast it is not shown and requires an insert on next page.
Appendix C Metro Transit In Black Diamond

Black Diamond Metro Bus Route 907 on Highway 169 in Black Diamond. Pre-pandemic, rush hour service was provided by Route 143 at the same location.
Appendix C Metro Transit In Black Diamond

Bus Stop at SR 169 and Ravensdale Road across from Black Diamond Community Center
This is one of only 3 stops on the only bus route.
Appendix D Pedestrians and Bikes in Black Diamond


Cyclist at SR169 and Black Diamond-Ravensdale Road, January 17, 2021. Cyclist on wrong side of road due driveways, lack of connection, and limited shoulders in this area.
Appendix D Pedestrians and Bikes in Black Diamond

Pedestrian on Lake Sawyer Road / 224th Ave SE near Ten Trails, April 4, 2021.

The above photos are the norm for active transportation, not the exception, in Black Diamond.
May 5, 2021

King County Growth Management Planning Council
King County Courthouse
516 Third Avenue
Seattle, Washington 98104

Dear Members of the Growth Management Planning Council and County and Interjurisdictional Staff:

Subject: Comments on the Draft 2021 King County Countywide Planning Policies and 2021 King County Urban Growth Capacity Report (April 2021 – Preliminary Draft).
Send via email to: GMPC@KingCounty.Gov

Thank you for the opportunity to comment on the Draft 2021 King County Countywide Planning Policies and 2021 King County Urban Growth Capacity Report. We strongly support the update to the countywide planning policies (CPPs) and the 2021 King County Urban Growth Capacity Report. We also have some comments and suggestions below. We also appreciate the many languages the CPP chapter summaries have been translated into. This increases the accessibility of the CPP update.

Futurewise works throughout Washington State to support land-use policies that encourage healthy, equitable and opportunity-rich communities, and that protect our most valuable farmlands, forests, and water resources. Futurewise has members and supporters throughout Washington State and King County and its cities.

Comments on the Draft 2021 King County Countywide Planning Policies (CPPs)

CPPs we support and we want to highlight

As mentioned above, Futurewise strongly supports the whole CPP update. However, there are some particularly good CPPs we want to specifically identify. They include:

- Updating EN-1 to include climate action, mitigation, and resilience, updating EN-31, EN-32, and EN-33, and proposed EN-29, EN-30, EN-38, EN-39, DP-5, and PF-X2. As King County and the cities are well aware, our county, state, country, and world are facing a climate crisis with no time to waste to reduce greenhouse gas pollution. So we support the attention given to

1 Snover, A.K., C.L. Raymond, H.A. Roop, H. Morgan, No Time to Waste. The Intergovernmental Panel on Climate Change's Special Report on Global Warming of 1.5°C and Implications for Washington State pp. 7 – 9 (Briefing paper prepared by the
reducing greenhouse gas pollution and adapting to climate change in these new and revised CPPs.

- Revising EN-2 to require regionally appropriate low-impact storm water approaches. This will protect salmon habitat and, in many circumstances, reduce stormwater infrastructure costs.²

- Revising EN-5 to call on the county and cities to ensure all residents of the region regardless of race, social, or economic status have a clean and healthy environment. For too long we have failed to address the disproportionate impacts of pollution and natural resource depletion on certain populations and areas. These revisions will help address these impacts.

- Proposed EN-7 which calls for locating “development in a manner that minimizes impacts to natural features through the use of environmentally sensitive development practices that take into account design, materials, construction, and ongoing maintenance.” This will protect people and the environment.

- Proposed EN-9 which calls for using “the best available science when establishing and implementing environmental standards.” Again, this will improve environmental protection and help recover salmon and steelhead.

- Amended EN-11 and proposed EN-12, EN-13, EN-15, EN-24, EN-26, and EN-28 will also help protect the environment and recover salmon and the southern resident orcas.

- Proposed EN-25 which calls on cities and the county to provide parks, trails, and open space within walking distance of urban area residents and to prioritize historically underserved communities for open space improvements and investments. This CPP will encourage serving all urban residents and address the needs of underserved areas and communities. Peer-review studies document the health and other benefits of being able to walk to recreation areas.

- The revisions to DP-1 which recognize that critical areas may be located and must be protected in all classifications of land subject to the Growth Management Act in King County. This will clarify that habitats and other critical areas must be conserved better protecting salmon and other wildlife and people and property from natural hazards.

- The additions to DP-2 that provide that housing and employment growth will be accommodated first and foremost in cities and centers within the urban growth area where residents and workers have higher access to opportunity and high-capacity transit. This policy will conserve natural resource lands, maintain rural areas, and help the region benefit from its investments in high capacity transit. The amended policy will also help reduce greenhouse gas pollution.


DP-3, DP-4, DP-6, DP-11, DP-42, DP-43, EC-7, EC-8, EC-11, EC-13, EC-23, EC-24, EC-25, T-1, T-X3, T-X4, T-X5, T-7, T-8, T-20, and PF-X1 which add equity to the factors considered in the countywide growth, investment, economic development, and transportation planning and implementation. This will reduce the burdens on and increase the benefits of development to historically adversely impacted and underserved populations and areas.

The proposed amendments to DP-12 and DP-13 which clarify the role of the targets. These policies are helpful because they clarify how the targets are used in the planning process and that they can be adjusted if needed through the reconciliation process. DP-12 and DP-13 are consistent with and help carryout VISION 2050.3

Proposed DP-X1 which provides that “[n]o new Fully Contained Communities shall be approved in unincorporated King County.” Fully contained communities are not needed to accommodate planned growth, will increase costs for public facilities and services since new public facilities and services will be needed in the fully contained community, and will generate increases in greenhouse emissions from transportation and other sources.

Proposed DP-X2 which clarifies that jurisdictions that need to reduce the differences between growth and development assumptions and targets contained in the countywide planning policies and comprehensive plans and actual development patterns are to adopt and implement reasonable measures as required by RCW 36.70A.215. This will increase housing opportunities and consistency between plans and actual development.

The revisions to DP-23 through DP-28 which will encourage the equitable annexation of land within the urban growth area. Cities have revenue sources and authorities that make them better suited to administering urban areas than counties. Annexing urban growth areas will also reduce cost burdens on the county.

DP-X3 which calls for evaluating and mitigating the potential physical, economic, and cultural displacement of residents and businesses in regional growth centers and high-capacity transit station areas, particularly for Black, Indigenous, immigrant, and other communities at greatest risk of displacement. This will reduce displacement and provide for more inclusive growth that will benefit the entire community.

The “Growth Centers” policies which will focus growth in centers and reduce displacement. Thoughtfully planned and implemented, centers can increase equity, increase opportunities, provide more opportunities for affordable housing, reduce public facility and service costs, reduce greenhouse gas pollution, and reduce water pollution.

The “Manufacturing/Industrial Centers” policies which provide opportunities for economic diversification and jobs available to many segments of our society.

The addition to DP-39 calling for equitable engagement in neighborhood and subarea planning. This will involve all segments of the community and help ensure that benefits and burdens are equitably shared.

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The improvements to the “H-Overarching Goal” and policies H-1, H-2, H-3, H-6, H-7, H-10, H-13, H-15, H-16, H-18, H-19, H-21, H-22, H-23, H-25 and proposed policies H-4, H-5, H-8, H-9, H-12, H-14, H-17, H-20, and H-24. These new and improved policies will help address the affordable housing crisis and historic inequities. For the reasons explained beginning on page 9 of this letter, we also strongly urge the county and cities to adopt fair share affordable housing allocations for each jurisdiction.

New T-X1, T-X2, and T-X7 which call for reducing the need for new general purpose capacity expansions and single-occupancy vehicle travel. Implementation of these new policies can help reduce transportation costs, water pollution, greenhouse gas emissions, and accidents and injuries.

Washington’s tax system is famously regressive. Washington State has the most regressive tax system in the country. Some of the taxes Washington uses to fund transportation, such as the gas tax, are also facing reductions due to structural factors such as the switch to electric vehicles. Proposed T-X6 will address these significant problems by calling on jurisdictions to advocate for and pursue new, innovative, sustainable, and progressive transportation funding methods.

Proposed T-X8 which calls for promoting coordination planning and effective management to optimize the movement of people and goods in the region’s aviation system in a manner that minimizes health, air quality, and noise impacts on the county and cities, especially frontline communities and calls for considering demand management. Implementing this policy can help meet aviation transportation needs while protecting people and the environment and reducing greenhouse gas pollution.

We support EN-37, but hazardous industries and essential public services should be relocated outside the area projected to be inundated by sea level rise during the expected life of the building or use. Please see page 13 of the Draft 2021 King County Countywide Planning Policies

Sea level rise is a real problem that is happening now and accelerating. So we support EN-37.

However, sea level rise projections are different than Federal Emergency Management Agency (FEMA) flood plain studies and maps. The FEMA flood elevations and maps are “derived from historical observations, and [are] calculated based on the frequency with which past high-water

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events, or the meteorological drivers of those events (e.g., high winds), have occurred.”

“Sea level rise projections, in contrast, are derived using models to project changes over time into the future.”

FEMA studies focus on certain specific events, such as the 100-year or 500-year “coastal flood – and do not address water levels during normal tides or other storm intensities.” The sea level rise projections for the Washington coast including Puget Sound, “in contrast, concern the long-term change in sea level, affecting the height of the water surface at all tidal elevations as well as during storm events.”

While it is good to move certain uses out of the 500-year flood plain, in some locations this will not be sufficient to address the inundation and storm surges caused by sea level rise. Hazardous industries and essential public services should be moved outside the area projected to be inundated by sea level rise during the expected life of the building or use. Sea level rise projections are available for most tidally influenced areas in King County. King County and its cities can adopt a CPP that is more protective than MPP-CC-10, the multi-county planning policy on which EN-37 is based.

Given the limitations of the 500-year flood plain, we recommend the county and cities do so. Our recommended additions are shown with double underling below.

EN-37 Address rising sea water by siting and planning for relocation of hazardous industries and essential public services away from the 500-year floodplain and outside the area projected to be inundated by sea level rise and storm surges during the expected life of the building or use.

The countywide process to reconcile and set growth targets in DP-12 should also reconcile and set jurisdictional affordable housing targets. Please see page 20 of the Draft 2021 King County Countywide Planning Policies.

There is a significant unmet need for affordable housing in King County cities and, to a lesser extent, unincorporated King County. Affordable housing is a classic regional problem, no jurisdiction causes the problem on its own and no jurisdiction can solve the problem on its own. But all jurisdictions need to contribute to solving the problem. This is why the Growth Management Act

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7 Id.

8 Id.

9 Id.

10 Id. p. 9 of 24.


(GMA) requires the CPPs to include “[p]olicies that consider the need for affordable housing, such as housing for all economic segments of the population and parameters for its distribution.”13 VISION 2050 encourages counties and cities to establish coordinated local housing and affordable housing targets.14

Because the GMA requires the CPPs to address the distribution of housing affordable to all economic segments, the countywide process to set and reconcile growth targets in DP-12 should also set and reconcile jurisdictional affordable housing targets. This addition is needed to address affordable housing needs and to comply with the GMA.

Increase the Jobs-Housing balance in Table DP-1 especially for Metropolitan cities. Please see pages 22 to 24 of the Draft 2021 King County Countywide Planning Policies

As the proposed CPP revisions point out, Regional Growth Strategy action RGS-Action-8 provides that “[c]ountywide planning groups will consider data on jobs-housing balance, especially recent and projected employment growth within Metropolitan and Core cities, to set housing growth targets that substantially improve jobs-housing balance consistent with the Regional Growth Strategy. Metropolitan and Core cities experiencing high job growth will take measures to provide additional housing capacity for a range of housing types and affordability levels to meet the needs of those workers as well as the needs of existing residents who may be at risk of displacement.”15

In 2018, the City of Bellevue was estimated to have 61,698 housing units and 143,023 jobs for a jobs to housing ratio of 2.32.16 With the proposed growth targets, Bellevue will have 88,698 housing units in 2044, and 197,023 jobs for a jobs to housing ratio of 2.22.17 In contrast the jobs to housing ratio in the other Metropolitan City, Seattle, is projected to decline from 1.74 in 2018, to 1.69 in 2044.18 Consistent with RGS-Action-8, the Growth Management Planning Council (GMPC) should increase Bellevue’s housing target by at least 10,000 housing units to better balance jobs and housing. This would reduce Bellevue’s jobs to housing ratio to 2.00.19 Because RGS-Action-8 provides that “Metropolitan and Core cities experiencing high job growth will take measures to provide additional

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13 RCW 36.70A.210(3)(c) underling added. The State of Washington Court of Appeals noted that the “GMA established the subjects that CPPs, as a minimum, were required to address. See RCW 36.70A.210(3). These subjects represent legitimate regional objectives.” King Cty. v. Cent. Puget Sound Growth Mgmt. Hearings Bd., 91 Wn. App. 1, 15 fn. 24, 951 P.2d 1151, 1158 fn. 24 (1998).
14 Puget Sound Regional Council, VISION 2050: A Plan for the Central Puget Sound Region p. 103 (Adopted October 2020). Also see page 110 where the Puget Sound Regional Council (PSRC) states it will provide guidance for developing local housing targets (including affordable housing targets), model housing policies, and best housing practices.
16 King County, 2021 King County Urban Growth Capacity Report pp. *47 – 49 (April 2021 • Preliminary DRAFT).
17 Id.; Draft 2021 King County Countywide Planning Policies p. 22 (March 31, 2021).
18 King County, 2021 King County Urban Growth Capacity Report pp. *51 – 53 (April 2021 • Preliminary DRAFT).
19 King County, 2021 King County Urban Growth Capacity Report pp. *47 – 49 (April 2021 • Preliminary DRAFT); Draft 2021 King County Countywide Planning Policies p. 22 (March 31, 2021).
housing capacity for a range of housing types and affordability levels to meet the needs of those workers as well as the needs of existing residents who may be at risk of displacement,” we do not believe that a balancing reduction in Seattle’s housing target is necessary to comply with the regional growth strategy.20

Perhaps more importantly, increasing Bellevue’s housing target by at least 10,000 housing units will protect the city, region, and residents if Bellevue’s employment growth exceeds its employment growth target. This is likely given the business expansions announced for Bellevue. Without more housing capacity, housing affordability will continue to suffer, traffic congestion will worsen, and greenhouse gas and water pollution will increase.

While Futurewise strongly supports the proposed revisions to DP-16, we recommend that it also recognize that VISION 2050 calls for stable urban growth areas. Please see page 25 of the Draft 2021 King County Countywide Planning Policies

“VISION 2050 calls for a stable and sustainable urban growth area into the future, thus any adjustments to the urban growth area in the coming decades should continue to be minor. When adjustments to the urban growth area are considered, it will be important to avoid encroaching on important habitat and natural resource areas.”21 Multicounty planning policy (MPP)-RGS-5 provides “[c]onsure long-term stability and sustainability of the urban growth area consistent with the regional vision.”22 MPP-RGS-6 also provides “Encourage efficient use of urban land by optimizing the development potential of existing urban lands and increasing density in the urban growth area in locations consistent with the Regional Growth Strategy.”23 MPP-DP-42 provides “[s]upport the sustainability of designated resource lands. Do not convert these lands to other uses.”24 The countywide planning policies must be consistent with VISION 2050 and the MPPs.25 DP-16 should be modified to implement these multicounty planning policies. Our additions are double underlined and our deletions are double struck through.

Ensure long-term stability and sustainability of the urban growth areas consistent with the regional vision in VISION 2050. In those limited circumstances where an adjustment is needed, [a]llow an adjustment expansion of the Urban Growth Area only if at least one of the following criteria is met:

[No additional changes are proposed to DP-16.]

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22 Id. p. 48.
23 Id.
24 Id. p. 97.
25 RCW 36.70A.100; RCW 36.70A.210.
In addition in both DP-16 and DP-17, the word “adjustment” should be substituted for “expansion” to ensure consistency with VISION 2050.

While Futurewise strongly supports the proposed revisions to DP-17(c), we recommend that DP-17(c) continue to apply to urban growth area expansions authorized by DP-16(a) or DP-16(b) to protect rural areas and resource lands from some of the adverse impacts of urban growth area expansions. Please see pages 26 and 27 of the Draft 2021 King County Countywide Planning Policies.

Existing DP-17(c) requires as an approval criterion that urban growth area expansions authorized by either DP-16(a) or DP-16(b) “[c]an be efficiently provided with urban services and does not require supportive facilities located in the Rural Area[.]” We strongly support the amendments to DP-17(c) making the CPP more specific, but recommend that DP-17(c) should continue to apply to urban growth area expansions authorized by either DP-16(a) (because more land is needed in the urban growth area) or DP-16(b) (the expansion is authorized under the “Four to One” program). This is necessary to protect rural areas, and natural resource lands from some of the adverse impacts of urban growth area expansions. Our recommended additions are double underlined and our recommended deletion is double struck through.

Since DP-17(c) would again be DP-17(c), it should follow amended DP-17(a) and (b).

**DP-19 should be modified to reflect the full range of data gathering and analysis conducted as part of buildable lands reports. Please see page 27 of the Draft 2021 King County Countywide Planning Policies.**

The amendments to DP-19 focus the buildable lands report on urban development and urban growth areas. But RCW 36.70A.215(2)(a) provides that the “review and evaluation program shall: (a) Encompass land uses and activities both within and outside of urban growth areas and provide for annual collection of data on urban and rural land uses, development, zoning and development standards, environmental regulations including but not limited to critical areas, stormwater, shoreline, and tree retention requirements; and capital facilities to determine the quantity and type of land suitable for development, both for residential and employment-based activities …” We recommend that DP-19 be broadened to address the wider scope of the program. This could include adding a subsection that states the “The review and evaluation program shall gather data on land uses and activities both within and outside of urban growth areas and analyze their consistency with comprehensive plans, countywide planning policies, and multicounty planning policies.”
Amend DP-22 to change “should” to “shall.” Please see page 29 of the Draft 2021 King County Countywide Planning Policies

Futurewise strongly supports the revisions to DP-22 which calls on cities to comprehensively annex unincorporated urban growth areas rather than cherry pick the areas most likely to increase city revenues. This will encourage jurisdictions to take a balanced approach to annexation and reduce burdens on the county which lacks the revenue sources available to cities. However, when reviewing annexations, boundary review board decisions must be consistent with countywide planning policies.\(^{26}\) Changing “should” to “shall,” would improve the boundary review board’s ability to effectively implement this policy. We recommend changing the “should” to “shall” in DP-22.

Futurewise strongly supports the affordable housing percentages and housing unit needs by income category in H-1. The CPPs should also require and include jurisdictional fair share affordable housing targets. Please see pages 45 to 47 of the Draft 2021 King County Countywide Planning Policies

As we all know, there is a significant unmet need for affordable housing in King County cities and, to a lesser extent, unincorporated King County.\(^{27}\) Affordable housing is a classic regional problem, no jurisdiction causes the problem on its own and no jurisdiction can solve the problem on its own. But all jurisdictions need to contribute to solving the problem. This is why the GMA requires the CPPs to include “[p]olicies that consider the need for affordable housing, such as housing for all economic segments of the population and parameters for its distribution.]”\(^{28}\)

We appreciate and support the many important steps that King County and the cities have taken to help resolve this problem. We also strongly support the countywide affordable housing targets in CPP H-1. These are necessary to solve the problem and to comply with the GMA.

However, the GMA requires more. There must be countywide planning policies that provide “parameters for its distribution,” the distribution of affordable housing.\(^{29}\) These are not explicitly included in the CPPs and must be. VISION 2050 encourages counties and cities to establish

\(^{27}\) Regional Affordable Housing Task Force, Final Report and Recommendations for King County, W/A p. 7, pp. 11 – 18 (Revised March 2019).
\(^{28}\) RCW 36.70A.210(3)(e). The State of Washington Court of Appeals noted that the “GMA established the subjects that CPPs, as a minimum, were required to address. See RCW 36.70A.210(3). These subjects represent legitimate regional objectives.” King Cty. v. Cent. Puget Sound Growth Mgmt. Hearings Bd., 91 Wn. App. 1, 15 fn. 24, 951 P.2d 1151, 1158 fn. 24 (1998).
\(^{29}\) RCW 36.70A.210(3)(c).
coordinated local housing and affordable housing targets.\textsuperscript{30} We strongly urge that the CPPs include jurisdictional fair share affordable housing targets. Jurisdictional fair share affordable housing targets are needed to adequately address affordable housing and to comply with VISION 2050 and the GMA.

\textbf{Comments on the 2021 King County Urban Growth Capacity Report (April 2021 – Preliminary Draft).}

Like the CPP update, Futurewise strongly supports the 2021 King County Urban Growth Capacity Report, formerly referred to as a Buildable Lands Report. For the most part, Futurewise thinks the new report accurately answers the questions review and evaluation programs are required to address.

We also appreciate including the additional information such as information on the jobs and housing balance. We also appreciate and support that after the 2019-2044 growth targets are finalized, the 2021 King County Urban Growth Capacity Report will compare the new targets with the jurisdiction’s capacity for growth.\textsuperscript{31} This will help show the jurisdictions and the community the ability of the county and the cities to accommodate their planned growth for the next 20 years. We also agree that reasonable measures need to be included in the final report.\textsuperscript{32}

We have some recommendations to improve the 2021 King County Urban Growth Capacity Report described below.

\textbf{Do not remove land with infrastructure gaps from the inventory of buildable land, instead the local governments with infrastructure gaps should update their transportation and capital facility plans to serve the land. Please see 2021 King County Urban Growth Capacity Report page 5 and Appendix G}

WAC 365-196-300(5)(b) provides that “[l]ocal capital facilities plans should include plans to provide existing urban areas with adequate public facilities during the planning period so that available infrastructure does not serve as a limiting factor to redevelopment at urban densities.” The State of Washington Department of Commerce’s Review and Evaluation Program Buildable Lands Guidelines call on addressing infrastructure gaps by adopting reasonable measures to provide infrastructure for lands with infrastructure gaps, not to remove the lands without capital facilities and services from the inventory of net buildable land.\textsuperscript{33}

\textsuperscript{30} Puget Sound Regional Council, \textit{VISION 2050: A Plan for the Central Puget Sound Region} p. 103 (Adopted October 2020). Also see page 110 where the PSRC states it will provide guidance for developing local housing targets (including affordable housing targets), model housing policies, and best housing practices.

\textsuperscript{31} King County, 2021 \textit{King County Urban Growth Capacity Report} p. *43 (April 2021 • Preliminary DRAFT).

\textsuperscript{32} Id. p. v.

The 2021 King County Urban Growth Capacity Report does the opposite of what WAC 365-196-300(5)(b) and the Review and Evaluation Program Buildable Lands Guidelines directs the county and cities to do. Rather than removing the parcels with infrastructure gaps from the net developable land inventory, the county or city should update its transportation and capital facility plan elements to provide those parcels with the necessary public facilities and services. This should be adopted as a reasonable measure for the applicable jurisdiction. Unless this change is made, the 2021 King County Urban Growth Capacity Report is not “[c]omporting with the new Department of Commerce Buildable Lands Guidance …” as is claimed on page 5.

Only deduct unbuildable critical areas and buffers from the inventory of buildable land. Please see 2021 King County Urban Growth Capacity Report page 5 and Appendix B pages 11 and 12

It is unclear what critical areas and critical areas buffers are deducted from the inventory of building land. We recommend that only critical areas and buffers that cannot be used to calculate allowed lots and housing units should be deducted. Not all critical areas are undevelopable, in cities and unincorporated areas development is permitted in flood plains, on certain wetlands, on aquifer recharge areas, and other critical areas. Some jurisdictions also allow the use of gross land area in calculating the allowable number of lots or housing units. Only unbuildable critical areas and their buffers that cannot be used to calculate allowed lots and housing units should be deducted. This is consistent with the State of Washington Department of Commerce’s Review and Evaluation Program Buildable Lands Guidelines which calls on “[r]emoving critical areas and buffers that cannot be used in calculate[ing] allowed density” when determining net buildable area.34

Use more realistic market factors. Please see 2021 King County Urban Growth Capacity Report page 10, Appendix D: Phase 4 Guidance – Final Capacity p. 3, and Appendix E

We appreciate and support the ongoing efforts to refine the market factors based on actual development. Snohomish County staff studied properties with additional capacity estimated in the county’s 2002 Buildable Lands Report that were unchanged since 2001, as indicated by the lack of development or the lack of development proposals as of 2019.35 This study showed that the actual market factor was much lower than the market factors in Snohomish County’s 2002 Buildable Lands Report. This table includes Snohomish County’s findings:

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35 Memorandum to Snohomish County Tomorrow (SCT) Planning Advisory Committee From Stephen Toy, Principal Demographer Subject: Updates to SCT Buildable Lands Procedures and Reasonable Measures Program Documents Recommended by the PAC Subcommittee p. 11 (April 2, 2020) last accessed on April 27, 2021 at: https://www.snohomishcountywa.gov/DocumentCenter/View/72651/20200409-BLR-Methods-and-RM-Update_PAC-Review.
Land Category | Existing Market Factor Assumption | Observed Market Factor 2002 – 2018
--- | --- | ---
Vacant | 15 percent | Bothell MUGA 6 percent Stanwood/Cedarhome 12 percent
Under-utilized | 30 percent | Bothell MUGA 10 percent Stanwood/Cedarhome 16 percent

Notes: MUGA means Municipal Urban Growth Area. In Bothell’s situation this is the part of the larger Southwest Urban Growth Area (SWUGA) that Bothell is planning to annex over time. The Stanwood/Cedarhome area is in northwest Snohomish County outside of the Southwest UGA.

**Source:** Memorandum to Snohomish County Tomorrow (SCT) Planning Advisory Committee From Stephen Toy, Principal Demographer Subject: Updates to SCT Buildable Lands Procedures and Reasonable Measures Program Documents Recommended by the PAC Subcommittee p. 11 (April 2, 2020).

As the above table shows, the actual market factors were much lower than the assumed market factors. And the time period analyzed for the above table was only six years. Over a longer period of time, the market factor will likely to be lower still. This evidence shows that market factors as high as 20, 30, 40, or 50 percent are unrealistically high.\(^{36}\) Commercial market factors as high as 50 percent in core cities and high-capacity transit communities are also too high.\(^{37}\) We recommend that the county and cities use a lower market factor based on more accurate data.

“[A] market factor represents the estimated percentage of net developable acres contained within a UGA that, due to idiosyncratic market forces, is likely to remain undeveloped over the course of the twenty-year planning cycle.”\(^{38}\) A classic example of a situation included in a market factor are historic buildings with less floor area than their allowed capacity but that will not be redeveloped because of their value as historic buildings or regulations that protect them. Another classic example is large estates that could be subdivided but are not likely to be subdivided because their owners value large homes and large lots.

While we agree that the use of actual data comparing actual deliveries with assumed supply is helpful data, it is not the same as a market factor and the data can also be misleading. For example, Table A1. Supply, Deliveries, & Capacity Table: Multifamily + Mixed Res, shows that some jurisdictions with “high” “market factor alignment[s]” have significant available capacity with low production of multi-family dwellings.\(^{39}\) Many factors can contribute to this low capacity such as a lack of demand, issues with public facilities and services that should be addressed in transportation and capital facility plans, and even that some of the land is being held off the market for the reasons that market factors are used to capture. But it is unlikely that Sammamish, for example, which produced 25 multi-family housing units between 2015-2019 and has a gross capacity of 2,157 housing units

\(^{36}\) King County, 2021 *King County Urban Growth Capacity Report* (April 2021 • Preliminary DRAFT) Appendix D: Phase 4 Guidance - Final Capacity p. 3 & Appendix E: Market Factor Guidance p. 23.

\(^{37}\) Id.


\(^{39}\) King County, 2021 *King County Urban Growth Capacity Report* (April 2021 • Preliminary DRAFT) Appendix E: Market Factor Guidance p. 30.
actually has 76 percent of the multi-family capacity unavailable because of a market factor. That is the case as well with other jurisdictions with high capacities and high market factors.

Using a high market factor when capacity exceeds demand over 20 years can have perverse consequences. The market factor is deducted from the land supply for the particular use, reducing the reported capacity. Using a high market factor may lead a jurisdiction to conclude that it needs even more land in that category when the jurisdiction already has enough or more than enough capacity. The jurisdiction will then have to plan for the transportation facilities and capital facilities needed to serve the existing land supply and the increased supply. This could be quite a burden for taxpayers and ratepayers.

Using an unrealistically market factor may also discourage jurisdictions from changing land use categories that it has an oversupply of, such as retail, to land use categories that it needs such as residential or mixed-use comprehensive plan designations because the report will show that they have little or no excess capacity in those categories. For these reasons, we recommend that more realistic market factors be used.

Chapter 4, Development Trends, should review growth and development in rural areas and on natural resource lands to determine if the growth trends and densities are consistent with the countywide planning policies and the King County Comprehensive Plan. Please see Chapter 4 page 13

We appreciate that the 2021 King County Urban Growth Capacity Report on page 13 looks that total net new housing units for the rural area between 2006-2018 along with other parts of the county. King County should be proud that only three percent of the housing units in the county were constructed in the rural area during that time period.

However, RCW 36.70A.215(2)(a) provides that the “review and evaluation program shall: (a) Encompass land uses and activities both within and outside of urban growth areas and provide for annual collection of data on urban and rural land uses, development, zoning and development standards, environmental regulations including but not limited to critical areas, stormwater, shoreline, and tree retention requirements; and capital facilities to determine the quantity and type of land suitable for development, both for residential and employment-based activities …” We recommend that the 2021 King County Urban Growth Capacity Report be expanded to consider growth trends and densities in the rural area and on natural resource lands and determine whether the growth trends, densities, and minimum lot sizes are consistent with the countywide planning policies and the county comprehensive plan as RCW 36.70A.215 requires.

Thank you for considering our comments. If you require additional information, please contact me at telephone 206-343-0681 Ext. 102 or email: tim@futurewise.org.

40 Id.
King County Growth Management Planning Council
Re: Comments on the Draft 2021 King County Countywide Planning Policies and 2021 King County Urban Growth Capacity Report (April 2021 – Preliminary Draft)
May 5, 2021
Page 14

Very Truly Yours,

Tim Trohimovich, AICP
Director of Planning and Law
May 5, 2021

King County Growth Management Planning Council
King County Courthouse
516 Third Avenue
Seattle, Washington 98104

Dear Members of the Growth Management Planning Council and County and Interjurisdictional Staff:

Subject: Comments on the Draft 2021 CPP Growth Targets, Jobs-Housing Balance in Bellevue
(April 2021 – Preliminary Draft)
Send via email to: GMPC@KingCounty.Gov

Thank you for the opportunity to comment on the Draft 2021 King County Countywide Planning Policies and 2021 King County Urban Growth Capacity Report. We have some comments below related to the proposed growth targets in Bellevue as they relate to the jobs-housing balance.

The organizations signing on this letter have been working together in the Eastside region to increase available options for residents to access affordable housing, identify feasible solutions to housing barriers, increase regional capacity, and expand needed housing resources to prepare for a shared response to rapid growth. We support a future where all those who live and work in our region benefit from a more affordable, accessible, opportunity-rich, and prosperous Eastside.

As the proposed CPP revisions point out, Regional Growth Strategy action RGS-Action-8 provides that “[c]ountywide planning groups will consider data on jobs-housing balance, especially recent and projected employment growth within Metropolitan and Core cities, to set housing growth targets that substantially improve jobs-housing balance consistent with the Regional Growth Strategy. Metropolitan and Core cities experiencing high job growth will take measures to provide additional housing capacity for a range of housing types and affordability levels to meet the needs of those workers as well as the needs of existing residents who may be at risk of displacement.”

In 2018, the City of Bellevue was estimated to have 61,698 housing units and 143,023 jobs for a jobs to housing ratio of 2.32. With the proposed growth targets, Bellevue will have 88,698 housing units in 2044, and 197,023 jobs for a jobs to housing ration of 2.22. In contrast the jobs to housing ratio in the other Metropolitan City, Seattle, is projected to decline from 1.74 in 2018, to 1.69 in 2044.

Consistent with RGS-Action-8, the Growth Management Planning Council (GMPC) should increase Bellevue’s housing target by at least 10,000 housing units to better balance jobs and housing. This would reduce Bellevue’s jobs to housing ratio to 2.00. Because RGS-Action-8

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2 King County, 2021 King County Urban Growth Capacity Report pp. *47 – 49 (April 2021 • Preliminary DRAFT).
3 Id.; Draft 2021 King County Countywide Planning Policies p. 22 (March 31, 2021).
4 King County, 2021 King County Urban Growth Capacity Report pp. *51 – 53 (April 2021 • Preliminary DRAFT).
5 King County, 2021 King County Urban Growth Capacity Report pp. *47 – 49 (April 2021 • Preliminary DRAFT); Draft 2021 King County Countywide Planning Policies p. 22 (March 31, 2021).
provides that “Metropolitan and Core cities experiencing high job growth will take measures to provide additional housing capacity for a range of housing types and affordability levels to meet the needs of those workers as well as the needs of existing residents who may be at risk of displacement,” we do not believe that a balancing reduction on Seattle’s housing target is necessary to comply with the regional growth strategy.6

Perhaps more importantly, increasing Bellevue’s housing target by at least 10,000 housing units will protect the city, region, and residents if Bellevue’s employment growth exceeds its employment growth target. This is likely given the business expansions announced for Bellevue. Publicly available data from major employers show Bellevue will meet more than 50% of its job growth target by 2025. At this rate, the current job growth target is too low and will, in turn, exacerbate Bellevue’s housing ratio. Without more housing capacity to balance this additional expected job growth, housing affordability will continue to suffer, traffic congestion will worsen, and greenhouse gas and water pollution will increase.

Thank you for considering our comments. If you require additional information, please contact our coordinator at telephone 253-886-2099 and email: brady@futurewise.org.

Warm Regards,

May 5, 2021

King County Growth Management Planning Council
401 Fifth Avenue, Suite 800
Seattle, Washington 98104

Subject: Public Comment for 2021 Updates to King County Countywide Planning Policies

Dear GMPC Members:

We, the undersigned, are former Sammamish City Councilmembers who care about our City’s future. We represent a broad spectrum of political viewpoints. But we are united in our strong belief around the following core principles: (1) all cities should be accessible and welcoming by providing for a range of housing choices; (2) all cities should plan for its reasonable share of forecasted population growth; and (3) all cities should be in compliance with the Growth Management Act (“GMA”). We have come together because we are gravely concerned that our current Sammamish city’s elected leaders are working at odds against these principles, as evidenced by the proposed low growth targets, which if adopted, would result in the practical equivalent of our city erecting a wall, and allowing entry for only those select few who can afford our high cost of housing, and isolating and absolving our city from any regional obligation to plan for future growth as required by the GMA.

We are submitting these comments to the Growth Management Planning Council (“GMPC”) to request you reject the unreasonably low and manipulated growth targets and ensure the City of Sammamish adopts targets consistent with its own laws, regional policies and requirements as mandated by GMA. Any GMPC action short of such scrutiny and accountability sets a very concerning precedent whereby other cities might be similarly incented to avoid regional obligations and commitments to plan for growth within their jurisdictions. Moreover, these proposed growth targets are clearly intended to justify future legislative land use actions to roll back Sammamish’s own housing plans and policies, which were previously adopted to ensure for adequate housing choices and affordable housing in a rapidly growing part of the region. This is especially disappointing because by Sammamish’s incorporation (which occurred after the state adopted the GMA) and acceptance of its role as a city inside the urban growth boundary and benefiting from that designation, they are also protecting the environment by honoring the permanent protections afforded to the rural areas. So any action to endorse or affirm Sammamish’s growth targets will result in significant adverse and practical consequences. The GMA is only as strong as our regional and jurisdictional commitments to ensure its ongoing adherence. It is for these reasons that we offer the following comments in support of rejecting Sammamish’s proposed growth targets.

Sammamish’s proposed growth targets result in virtually no new affordable housing for the next twenty-five years, even after woefully failing to meet its affordable housing targets in
**The current planning period.** The April 2021 draft King County Urban Growth Capacity Report includes a net residential unit capacity of 483 units for the City of Sammamish. However, the City’s Comprehensive Plan indicates that 1,856 affordable housing units – the amount that is required to bring Sammamish in line with the County’s affordability standards for new development – will be delivered between 2020 and 2035, just a portion of the time covered by the current Urban Growth Capacity Report. This misalignment of growth targets comes on top of a history of underperforming affordable housing production. According to Sammamish Home Grown, a housing plan adopted by Sammamish City Council in 2019, only 80 affordable housing units were provided in the 18-year period between 1999 and 2017. During a time of rapid growth in King County, Sammamish would not be providing its “share” of countywide housing needs by drastically scaling back both its overall housing unit provision target and its affordable housing provision target. The GMA provides that comprehensive plans should “[e]ncourage the availability of affordable housing to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock.” RCW 36.70A.020(4). Despite this, and despite its own Comprehensive Plan’s targets, the City’s current growth targets would not fulfill this goal.

**Sammamish’s proposed growth targets are directly at odds with the latest proposed amendments to the Countywide Planning Policies to ensure equitable and inclusionary development of affordable housing.** The Growth Management Act (GMA) explains that the housing element of comprehensive plans should both: (1) identify sufficient land for low-income families; and (2) “make adequate provisions for existing and projected needs of all economic segments of the community.” Sammamish’s Comprehensive Plan states: “Given the cost of single-family housing, and because mixed-use and multifamily housing types are typically more affordable than single-family, detached housing, the City recognizes the importance of having sufficient zoned capacity for multifamily and Town Center mixed-use residential development in order to meet affordability needs.” Vital town centers provide the density of living, working and gathering that affords a myriad of economic, transportation, social and environmental benefits for a city, as well as for the region. Despite this, the current draft growth targets would leave no room for development at the Town Center (described further below) effectively shutting affordable housing out of Sammamish – continuing a trend of underperformance on affordable housing production (as described above). By the City’s actions to negate the Town Center planning and block development of affordable housing as well as market value multifamily and senior housing, the city is acting contrary to the GMA, Vision 2040, Vision 2050 as well as its own Comp Plan. If adopted, Sammamish’s growth targets would undermine and impede both GMA objectives and would undermine the newly proposed policies to ensure that King County communities develop more equitably.

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2 “Sammamish Comprehensive Plan – Housing,” April 2020
Sammamish’s proposed growth targets violate its own comprehensive plan and cause other cities to absorb more housing to make up the difference. The 2014 Buildable Lands Report stated that the City’s Town Center “with planned capacity for over 600,000 square feet of commercial development and approximately 2,000 housing units” would represent “a large majority of the City’s overall capacity of commercial and residential development.” These same numbers are reported in the City’s Comprehensive Plan. To date, 314 units have been built in the Town Center, with an additional 392 in the pipeline--a total of 706 units. The draft Report now states there is no residential capacity in the Town Center for additional units for the next 25 years beyond these 706 units that have been built or are in the pipeline. This represents a 65% reduction in what the City previously stated as the total Town Center capacity. In fact, it appears that Sammamish’s efforts to undermine its own ability to plan for and help manage growth started when its Town Center adopted plan started to become a reality. In Stickney v. Sammamish, CPSRGMBH Case No. 15-3-0017, the Growth Management Hearings Board explained that jurisdictions must address and provide the jurisdiction’s “share” of countywide housing needs. Cities should not be able to exempt themselves from providing their “share” of countywide housing needs, and especially so cities like Sammamish with a demonstrated history of attempting to not provide housing for all economic segments of the community, as evidenced by the Stickney case. Growth targets in most cases are considered a minimum and not a maximum. The City seems to be implying that they will be using them as a maximum by stating they might need to halt development until 2044. This would be contrary to well established GMA rules and land use laws. It could also undermine the rights and interests of property owners, who with reasonable expectation, have been paying taxes on land with valuation based on zoning and potential development and reasonably expecting that they can develop their land at the zoned level.

The GMPC should not legitimize Sammamish’s efforts to halt housing growth, when it is currently deemed to be in violation of the Growth Management Act (GMA) by the Growth Management Hearings Board, and the matter has been referred to the Governor’s Office for possible sanctions. The Gerend v. Sammamish lawsuit stemmed from Sammamish’s efforts to adopt new transportation concurrency rules aimed at halting mixed use and commercial development in the City. Most recently, the City has pegged its reduction in growth targets to a moratorium on certificates of sewer availability adopted by the Sammamish Plateau Water and Sewage Department on February 22, 2021. This development moratorium, based on a near-term infrastructure constraint, is being used as the basis for long-term limits on residential growth. Presumably, once this short term moratorium is lifted, then the City would have no further justification for its proposed low growth targets. And yet, City officials have publicly discussed potential plans to halt all development for the very long term that exceeds the growth targets. In a presentation made during a City Council meeting on March 9, 2021, staff included the following consideration: “If we assigned a target of 661 units we would then need

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3 2014 King County Buildable Lands Report at 29. The Report further stated that, as of 2012,
5 City Council Agenda Bill Memo dated March 10, 2020 (“Town Center Work Program”), submitted with March 17, 2020 City Council Meeting Agenda (reporting a total of 314 residential built in the Town Center)
6 Sammamish Plateau Water and Sewer District, King County, Washington, Resolution No. 5018
to halt development until 2044 and likely be in a moratorium of some kind to stop development...”. The most recent adopted moratorium exempts single family housing while continuing to prohibit the development of multi-family housing. This simply exacerbates the problem and reinforces the discriminatory nature of the moratorium as this effectively keeps out lower income families. Therefore, adoption of Sammamish’s proposed growth targets (resulting in virtually no growth for the planning period in question) would legitimize the City’s multiple efforts to thwart the GMA. The GMPC should not allow a city whose practices are found to be non-compliant with the GMA by the Growth Management Hearings Board to make a proposal which reinforces their non-compliance and not be subject to further scrutiny.

For these reasons, we ask you uphold the mandate of the GMA in its application to Sammamish’s proposed growth targets, and reject them in demanding new targets that are compliant with its own comprehensive plan, the region’s policies and to do the hard work, like other compliant jurisdictions, of actually doing its part to prepare for growth in a responsible and planned fashion to meet the growing needs of our region.

We thank you for your consideration.

Sincerely,

Don Gerend,
Former Mayor and Councilmember, 1999-2017

Kathy Huckabay
Former Mayor and Councilmember, 1999-2017

Bob Keller
Former Mayor and Councilmember, 2014-2017

Tom Vance
Former Mayor and Councilmember, 2012-2015

Michele Petitti
Former Mayor and Councilmember, 2002-2011

Ramiro Valderramma
Former Deputy Mayor and Councilmember, 2012-2019

Jason Ritchie
Former Councilmember, 2018-2021
Randy Grein, rgrein@me.com

I was apprised of the deadline for public comment by a friend tonight. I have not read the entire document, but I did spot one glaring problem. The city of Bellevue has a target of 27,000 new housing units by 2024 but intends to add 54,000 jobs. In the immortal words of Alexander Hamilton, are you out of your goddamned minds?

There is currently zero - ZERO! Housing available in the city at this time. While Covid has reduced commuters that is rapidly ending; you may recall we had the 3rd worst traffic in the nation just over a year ago. Most of that will return in the next year. Yes, I’m sure there will be some increase in telecommuting but there will be a greater increase in jobs. It is not possible to build enough roads to handle that level of traffic, traffic on city streets is just as bad. People are moving 2 hours commute time out to find houses they can afford. This is not sustainable.

I am an IT professional; I make more than the mean here in Bellevue where I have lived for over 30 years. Yet I cold not afford to buy a house in town now, even if my wife were still working. Nor could I afford to commute 4 hours a day - not when mass transit in the area is a joke, not when work means sometimes late nights, early mornings and weekends. It’s worse for the working poor. Putting 20,000+ miles a year on an aging car to get to and from work on a laughably insufficient minimum wage - because busses don’t go where people need to be, nor at the time they need - and certainly not in a reasonable amount of time.

And yet you are giving Bellevue a pass on doing the hard work of providing housing enough to live HERE instead of Puyallup. And past Marysville. We can do better, we need to do better. I don’t need to tell you all the advantages of keeping people close to where they work. I surely should not have to tell you about how bad traffic is, and how much worse this plan will make it. And I know it will be unpopular in the city. Some residents like their little ‘bedroom communities’ and don’t want to contemplate change. And I especially get that no one gives a damn about the poor. The working poor, the fallen off the grid poor, the ‘just getting by because housing and transit is costs are too high’ poor adjacent.

But maybe it’s time we started to think about it. If the goal is to keep growth in the urban areas this isn’t doing it for the Eastside.

Randy Grein
rgrein@mac.com
857 164th Pl NE
Bellevue, WA 98008
425-256-0317
MEMORANDUM

To: King County Growth Management Council
From: HR&A Advisors, Inc.
Date: May 4, 2021
Re: Comment on the Draft 2021 King County Urban Growth Capacity Report and Countywide Planning Policies

HR&A Advisors, Inc. (HR&A) was engaged by STCA, LLC and STC JV 1 LLC (STCA) to review King County’s draft Urban Growth Capacity Report, the draft growth targets in the Countywide Planning Policies, and related data. HR&A is a nationally active consulting firm with 40 years of experience working on projects at the intersection of economics, public policy, and real estate. Our work throughout the Greater Seattle Area includes developing a funding strategy for ongoing operations and maintenance of new open space along the Central Waterfront, advising a local developer and City north of Seattle on the feasibility and potential economic and fiscal impacts associated with a proposed large-scale development, and most recently, advising on the economics of a proposal to create a lid over portions of I-5 in Downtown Seattle.

STCA had observed that the City of Sammamish’s proposed growth capacity calculations and growth targets were significantly reduced from previous levels and are misaligned with the City’s own Comprehensive Plan as well as with the County’s policy goals. Based on HR&A’s review of countywide development trends, City of Sammamish’s public statements and data, and King County planning documents, we urge King County to closely review the data and rationale behind City of Sammamish’s draft growth capacity figures and growth targets before acceptance. Our assessment found that:

- The City of Sammamish’s progress toward past growth targets is unclear and requires verification.
- Low draft growth capacity targets are driven by large discounts to developable land area and infrastructure capacity limitations that are not clearly explained and may only be temporary.
- The currently-proposed growth capacity targets would signal that the City is eliminating capacity for multifamily development in the Town Center – the primary, if not only, location in the city to deliver affordable housing. This approach is misaligned with the City’s Comprehensive Plan and the County’s policy goals and would set a concerning precedent for high-opportunity areas throughout the county.

The below memorandum summarizes HR&A’s analysis of the market and planning context surrounding development of the draft growth capacity calculations and growth targets and identifies key areas for further consideration and review. Select documents referenced throughout this memorandum are attached for reference.

Introduction

As the Growth Management Planning Council (GMPC) and County team know well, King County’s population and economy have expanded rapidly over the past ten years, fueled by the region’s high quality of life and continually high number of job opportunities, particularly with major tech industry employers. Between 2010 and 2019, King County’s population increased by 16.2%, while the number of jobs in King County grew by just under 29%, amounting to 1.5 million jobs in the county. In the past five years alone, the county’s population increased by 200,000 (9.5%), while adding 100,000 jobs (7%). During this same period, job growth has outpaced the demand for, and delivery of, housing units in the county’s urban cores. Between
2010 and 2019, 199,000 new housing units were delivered in the county, increasing total housing stock by 13.9%. This means that for every new job in King County, only 2/3 of one housing unit is delivered.

The housing market was reaching a critical point even before the COVID-19 pandemic, but the effects of the pandemic, which are driving a greater number of residents and households out of the urban core, will exacerbate the housing shortage. According to the Seattle Times, 5,750 households left Seattle during the pandemic, the vast majority of which relocated to the east side of King County, increasing housing market pressure in this part of the county. Since the onset of the pandemic, the median home sale price on the east side of King County has increased by 27%, the total number of homes sold has increased by 56%, and the average number of days on the market has decreased by 88%. As the region’s communities and economy recover from the pandemic, more opportunities to produce housing and more diverse housing options, rather than less, will be key to enabling further growth and regional strength.

Moreover, the county needs additional affordable housing at all levels, particularly in areas close to job centers and urban cores. All levels of government in Washington State have elevated and are responding to this need. The State has demonstrated a legislative focus on affordable housing as well, with the signing of four bills (SB 5235, HB 1220, SB 5287, and HB1277) in quick succession to address a wide range of issues including: removing arbitrary limits on housing options, providing additional revenue sources for eviction prevention and housing stability services, supporting emergency shelters and housing through local planning and development regulations, and amending affordable housing unit incentives.1–4 These four bills currently await the Governor’s signature, but indicate the legislature’s focus on fostering more affordable housing and recognition of the impact that the current underproduction of affordable housing is having on the region. The most recently posted draft County Planning Policies indicate a need for more than half a million units at various levels of affordability by 2044.5 At the local level, cities throughout the east side are responding by modifying incentive programs and codes to foster and accommodate affordable housing. For example, Bellevue is in the process of modifying its Multi-Family Tax Exemption Program, while Kirkland has enacted a series of tools and legislation to increase the production of affordable housing, including an inclusionary zoning policy, tax exemptions for projects that include 10% to 20% affordable units, and most recently, new missing middle and accessory dwelling unit rules and regulations that make the development and purchase of cottage units more accessible.6–8

The City of Sammamish’s draft growth capacity calculations included in the 2021 King County Urban Growth Capacity Report and the draft growth targets in the Countywide Planning Policies are in opposition to the above-described policy focus and the County’s priorities around growth, goals to meet the need for affordable housing, and commitment to bring an equity lens to regional planning. The targets would effectively eliminate the mandate to continue development in line with the creation of a vibrant, mixed-use town center, which is associated with the creation of jobs and diverse housing options and are inconsistent with the City’s own Comprehensive Plan.

Analysis of the City of Sammamish’s calculated capacity, the County’s draft growth targets, and implications for local and regional development are described further below. These capacity calculations and growth targets (as with all jurisdictions’) should be carefully examined to ensure that they do not create unwarranted or inappropriate obstacles to much-needed development in high-opportunity areas of King County.

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1 “Senate Bill EESSB 5235 – Final Bill Report.”
3 “Senate Bill E2SSB 5287 – Final Bill Report.”
4 “House Bill E2SHB 1277 – House Bill Report.”
6 “Kirkland Municipal Code – Chapter 113 – Cottage, Carriage, and Two/Three-Unit Homes.”
7 “City of Kirkland Receives 2020 Municipal Champion Award.”
8 “Kirkland Municipal Code – Chapter 112 – Affordable Housing Incentives – Multifamily.”
City of Sammamish Residential Capacity & Draft Growth Targets

The City's Phase 3 estimates for growth capacity, developed in 2020, reported a residential capacity of 3,288 residential units.9 Then, after the Phase 4 "market factor discount" analysis, the April 2021 draft of the King County Urban Growth Capacity Report (the Report) lists the City of Sammamish's residential unit capacity as 1,144 units, with 661 units currently in the pipeline, leaving a net capacity of 483 residential units to be developed in Sammamish over the next 25 years.10 The 65% reduction between the Phase 3 capacity estimates and the draft Report's stated capacity requires further review before acceptance. The assumptions used to achieve this reduction and key considerations around these are described below.

- **The assumption for residential units delivered between 2006 and 2019 requires clarification and verification.** During a November 2, 2020 City Council meeting, City of Sammamish staff stated that 3,963 units were delivered in Sammamish between 2006 and 2019. We understand that this is based on housing estimates King County derived from data in the Washington State Office of Financial Management's Small Area Estimates, which may vary somewhat from on-the-ground unit counts based on methodology used to project units. These estimates should be verified before acceptance.11 Additionally, there are discrepancies in data from different sources citing the number of units delivered between 2006 and 2018. It appears that the King County has used OFM estimates to arrive at a calculation that 3,585 units were delivered between 2006 and 2018, while the Puget Sound Regional Council’s A Regional Coalition for Housing (ARCH) data indicates that 2,353 units were built during this same period, and City staff reported that 2,540 residential units were built from 2006-2018 (with an additional 232 residential unit permits “finaled” in 2019).12,13 There is no apparent or clear reason for these discrepancies and our review did not identify public documents in which these different estimates are reconciled. The City is currently using the OFM estimate of 3,963 units built from 2006 to 2019 to support its current development moratorium.14 The assumptions behind this number should be verified and the significant discrepancies in the above numbers should be reconciled or explained through review of local permitting data or other sources.

- **The City’s discount for right of way and public purpose is high compared to other cities and towns within Sammamish’s cohort, and should be closely examined.** After determining land capacity, the City through the “Phase 3” process reduces available land for residential development by the amount of land that makes up critical areas and then reduces this again based on discounts for right of ways and public purpose, a total reduction of 34%.15 This assumption is consistent with the assumption Sammamish used in the 2007 and 2014 Buildable Lands Studies but is far higher...
than the assumptions used by other municipalities in the Cities and Towns group, which range between a 0% and 20% discount. As with the consideration above, the rationale for this assumption should be reviewed closely, as this discount removes over one third of the land that may be eligible for development and included in capacity calculations.

- **The City’s use of growth capacity targets as a ceiling for development is at odds with its own planning decisions.** City officials have openly discussed the potential need to halt all development that exceeds the growth targets. In a presentation made during a City Council meeting on March 9, 2021, City staff included the following consideration: “If we assigned a target of 661 units we would then need to halt development until 2044 and likely be in a moratorium of some kind to stop development…”. The following assumptions, which require further examination, constrict the submitted development capacity and could be used to undermine local commitments to growth. Moreover, the current development moratorium, extended by the City Council on April 20, 2021, explicitly cites the City’s development progress and draft Urban Growth Capacity calculations as evidence of Sammamish’s incapacity to support development.

  - **Minimum allowable density, rather than planned density, is used to calculate land capacity.** The City’s determination of land supply is based on the use of minimum density per zone for all developable areas evaluated (a total of ~738 acres at densities ranging from 1 to 18), rather than using the maximum planned densities (which range from 1 to 40 dwelling units per acre). The rationale for the use of minimum densities should be examined closely, as this does not align with the City’s own planning decisions, which resulted in the planned densities, and adjusting this assumption to rely on planned densities, particularly for mixed-use zones like the Town Center, could drastically increase the City’s capacity for development.

  - **A temporary infrastructure constraint may be used as the basis for long-term limits on residential growth.** The City’s most recent development moratorium cites, among other reasons, a moratorium on certificates of sewer availability adopted by the Sammamish Plateau Water and Sewer District on February 22, 2021. The City appears to be using this same sewer certificate moratorium as a basis for the 65% “Market Factor Discount” on estimated land capacity. This is a 90-day moratorium scheduled to expire on May 24, 2021. This temporary condition should be carefully weighed against the potential to shape planning decisions for the next 25 years. Further, as a matter of transparency, we recommend that the County ask the City to cite the specific factors that led to the 65% Market Factor Discount, and to evaluate whether those factors justify such a significant discount over an extended planning period. To the extent deficiencies in infrastructure are identified as a capacity constraint, the County should ask what actions have been or could be taken to cure those deficiencies and in what time frame.

  - **There is misalignment between the City’s Comprehensive Plan and current growth capacity calculations.** The 2014 Buildable Lands Supply stated that the City’s Town Center “with planned capacity for over 600,000 square feet of commercial development...”  

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16 “King County Countywide Planning Policies Growth Target Discussion – Cities and Towns Regional Geography Caucus.” April 2, 2021
18 Memo from D. Pyle, Director of City of Sammamish Department of Community Development, dated March 9, 2021, Table 4 (Draft UGCS Phase IV Results), citing “constraints identified by SPWSD” (Sammamish Plateau Water and Sewer District.). See Attachment 3.
19 Sammamish Plateau Water and Sewer District, King County, Washington, Resolution No. 5018
and approximately 2,000 housing units” would represent “a large majority of the City’s overall capacity of commercial and residential development.” These same numbers are reported in the City’s Comprehensive Plan. To date, 314 units have been built in the Town Center, with an additional 392 in the pipeline—a total of 706 units. The draft Report now states there is no residential capacity in the Town Center for additional units for the next 25 years beyond these 706 units that have been built or are in the pipeline. This has particular implications for affordable housing. The City’s Comprehensive Plan states: “Given the cost of single-family housing, and because mixed-use and multifamily housing types are typically more affordable than single-family, detached housing, the City recognizes the importance of having sufficient zoned capacity for multifamily and Town Center mixed-use residential development in order to meet affordability needs.” According to the 2014 Buildable Lands report, the Town Center’s multi-family capacity was 1,742 residential units—representing 99% of the total multi-family capacity of 1,770 units City-wide. Vision 2050 notes the importance of locally-designated town centers in Cities and Towns and recommends that they “become priority areas for future investments and growth at the local level.” Consistent with this guidance, King County should closely examine what specific factors led the City to reach its conclusions about the significant reductions in total Town Center capacity compared to what was stated in the 2014 Buildable Lands Report.

**Relationship to King County Growth & Equity Goals**

While the Cities and Towns regional cohort, Sammamish’s cohort, is allocated only 5% of the county’s residential growth, VISION 2050 identifies these jurisdictions as providing “important housing, jobs, commerce, and services in their downtowns and local centers.” Moreover, VISION 2050 states that jurisdictions in this cohort that are located within the contiguous urban growth area (as Sammamish is) “should be able to accommodate a larger share of growth due to their proximity to the region’s large cities, existing and planned transportation systems, and other supporting infrastructure.” Under the draft Growth Targets, the City would have a target just under 4.3% of the Cities and Towns total growth target, despite its large population for the cohort. Sammamish is a large city for this cohort, with 64,700 residents compared to the average jurisdiction’s population of 10,100 residents. It also has many attributes that make it an important part of the housing ecosystem in King County, so it is imperative that Sammamish prepare to receive an appropriate share of projected growth over the next 20+ years. Among other things, the Sammamish’s schools rank above average, with school districts ranked as the 4th and 5th best school districts in the state, respectively. Additionally, the city offers access to significant open space and natural recreation, including two open space preserves, nine City parks, and easy access to six other County or State nature preserves.

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20 2014 King County Buildable Lands Report.
23 See Memo from D. Pyle, Director of City of Sammamish Department of Community Development, dated March 9, 2021, Table 4 (Draft UGCS Phase IV Results), citing “constraints identified by SPWSD” (Sammamish Plateau Water and Sewer District.)
24 “2014 King County Buildable Lands Report.”
25 “VISION 2050.” Puget Sound Regional Council
26 “VISION 2050.” Puget Sound Regional Council
27 “VISION 2050.” Puget Sound Regional Council
28 ACS 5 Year Estimates – 2014-2019
29 “King County Urban Growth Capacity Study – Overview and Next Steps.” April 2020
30 Niche. April 20, 2021
Sammamish also has the highest median income in the region, with a median income just over $174,000, while the county has a median income of $94,970. Inappropriately constrained residential growth targets in an area that provides a high quality of life is antithetical to the King County Growth Management Planning Council’s recent commitment to viewing growth management planning through an equity lens.

Moreover, the City of Sammamish’s low residential growth targets are misaligned with the need for affordable housing throughout the county, and particularly on the east side. Over the past decade, the median home value in King County has nearly doubled, rising from $386,000 in 2010 to $643,000 in 2019. This trend can be seen in the multifamily market as well, with rents per square foot rising from $1.66 to $2.29 in 2019. Increasing costs coupled with more moves out of the urban core (as described earlier in this comment) will only increase the need for affordable housing in areas like Sammamish.

The City of Sammamish’s Comprehensive Plan indicates that 1,856 affordable housing units — the amount that is required to bring Sammamish in line with the County’s affordability standards for new development — will be delivered between 2020 and 2035. According to Sammamish Home Grown, only 85 affordable housing units have been delivered since 1998. The remaining number of affordable housing units required to complete Sammamish’s affordable housing commitment (approximately 1,580 units per OFM Small Area Estimates) exceeds the entire growth target and capacity included in the Report. Sammamish has accounted for less than 1% of the affordable housing produced on the east side of King County between 1998 and 2017, and their current targets set them up to continue this trend. This burdens other municipalities in the immediate region to deliver affordable housing at a time when that housing is much-needed and these cities and towns are already working to increase affordable housing in the immediate region and to produce their proportionate share of affordable housing.

Based on the above-described findings, the King County team should carefully review the City of Sammamish’s submitted data, growth capacity calculations, and growth targets. More broadly, the County team should consider the implications of allowing one jurisdiction to offload its responsibility for supporting regional growth, before accepting the stated targets, both in terms of meetings its policy goals and its responsibilities under the State Growth Management Act.

31 “City of Sammamish, Parks & Trails.” April 2020
32 CoStar
33 “Sammamish Comprehensive Plan — Housing.” April 2020
34 “Sammamish Home Grown | A Plan for People, Housing, and Community.” April 2020
35 “Sammamish Home Grown | A Plan for People, Housing, and Community.” April 2020
SUBJECT: Update to King County Countywide Planning Policies (CPPs) Regional Growth Allocations/Targets

DATE SUBMITTED: October 30, 2020

DEPARTMENT: Community Development

NEEDED FROM COUNCIL: ☑ Direction

RECOMMENDATION: Following presentation by and Q&A with King County on the County's Urban Growth Capacity Study (UGCS) and updates to the County's Countywide Planning Policies (CPPs) (see November 2, 2020 Special Meeting Agenda Item #5), separately discuss the City's engagement in the regional effort of updating growth allocations/targets and provide direction to staff on further engagement in this regional process.

EXHIBITS: 1. Exhibit 1 - Cities and Towns Geography Caucus Survey

BUDGET:

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<th>Fund(s)</th>
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WORK PLAN FOCUS AREAS:

- ☑ Transportation
- ☑ Communication & Engagement
- ☑ High Performing Government
- ☑ Environmental Health & Protection
- ☑ Community Safety
- ☑ Community Livability
- ☑ Culture & Recreation
- ☑ Financial Sustainability

NEEDED FROM COUNCIL:

Discuss the City's engagement in the regional effort of updating growth allocations/targets as part of the County's update of Countywide Planning Policies (CPPs) and provide direction to staff on further engagement in this regional process. How does the Council want staff to proceed in engaging and how does the Council want to receive future updates on this County program?

KEY FACTS AND INFORMATION SUMMARY:

King County has scheduled the next Geography Caucus meeting for the Cities and Towns Geography group to continue discussions amongst the Cities regarding growth allocations/targets for Tuesday November 10 from 10-12 AM. With this in mind, the November 2 meeting is the only/last chance to get the Council together on this topic before staff return to the conversation with the other 18 cities that are part of our Caucus to discuss growth allocation/targets. This agenda item provides a venue for the Council to discuss what was learned from
the King County presentation (see November 2, 2020 Special Meeting Agenda Item #5) and provide direction to
staff.

It is important to note that this is a King County process, not a City of Sammamish process. City staff represent
the City in the Geography Caucus discussions. A question on the Council's role is included below with the King
County response:

**CITY COUNCIL QUESTION:** Are elected officials be able to enter these caucus meetings & are any other elected
officials present at this juncture?

**KING COUNTY RESPONSE:** As to the question about electeds attending, all previous growth target discussions
have been staff-level deliberations, with staff responsible for briefing their city’s elected officials and bringing
that perspective back to their Regional Geography meetings. This creates a peer-to-peer environment, which we
have found levels the playing field and helps to support open communication......The ultimate venue for elected
official participation, review and approval of the Countywide Planning Policies is the Growth Management
Planning Council.

**Background**
Below we have included a very high level and simplified overview of the division of growth forecasted for the
Puget Sound, King County, the Cities and Towns Geography group, and finally what this means for **Sammamish**.

NOTE: The data received from King County includes fractional units and fractional percentages. The numbers below are shown as rounded for the purpose of simplicity in reporting. Keep in mind fractional units and fractional percentages makes a difference in the final numbers and must be included in any independent calculations.

1. **Start Here – Regional Growth**

**Vision 2050 Regional Forecast:** Growth of ~1,321,674 people between 2019-2044 (*this is how many
people are forecasted to move to the Puget Sound region in the next planning horizon of 2019-2044*).

2. **Then break down to King County**

**King County Share of Vision 2050 Forecast (50%):** Growth of ~660,837 people between 2019-2044 (*this
is how many people PSRC anticipates will move to the King County portion of the region in the next
planning horizon of 2019-2044 which is 50% of the regional share*).

3. **Then break down to Cities and Towns Geography group**

**Cities and Towns Geography Category Share of King County Growth (5%):** Growth of ~33,307 people
between 2019-2044 (*this is how many people King County anticipates moving to areas in the Cities and
Towns Geography group and is adjusted for factors such as unit vacancy rates – 5% of the growth in
King County is anticipated to take place in areas that are within the Cities and Towns geography group*).

**Cities and Towns Geography:** The Cities and Towns Geography group is made up of 19 cities with
varying attributes. See table below.

4. **Then convert from people to housing units**

**Cities and Towns Housing Units (convert from people to housing units):** Growth of ~13,985 housing
units between 2019-2044 (*converted based on a per-household rate of 2.75 as assigned by King
County*).
UGCS/CPP Cities and Towns Household Size Used: 2.75 (adjusted Household Size for Cities and Towns Geography).

5. Then break down to Sammamish specifics:

Sammamish PRELIMINARY Land Capacity (reported by King County from Phase 3 of draft UGCS): 3,288 Units (Before application of Market Factor – Market Factor to be added in next and final phase of UGCS).

The following numbers represent three different representations of possible growth for Sammamish from 2019-2044 and are based on ratios relative to several descriptive statistics that compare how Sammamish fits into the Cities and Towns Geography group (how Sammamish compares to other Cities as a method to divide growth allocation for Cities and Towns). These numbers do not represent maximum or minimum values for a draft or final growth allocation, these are simply relative numbers as to how Sammamish fits into the Cities and Towns Geography Group (e.g. don’t interpret these numbers to be possible growth targets). These number are not binding in the growth allocation discussion.

Sammamish High Relative Factor: 4,547 Units between 2019-2044 (a function of Sammamish’s share in percentage of land area in the Cities and Towns category – Sammamish makes up the largest area in the Cities and Towns Geography group at 33% - if Sammamish’s growth allocation was based in its size respective to other cities in the group, this is what it would be).

Sammamish Average Relative Factor: 3,773 Units between 2019-2044 (a function of the average of statistical factors relative to Sammamish compared to other cities in the Cities and Towns category such as total number of housing units in 2020, ratio compared to past housing unit target, land area, etc. – if Sammamish’s growth allocation was based on a compilation of various attributes this is one example of what it could be).

Sammamish Low Relative Factor: 1,743 Units between 2019-2044 (a function of Sammamish’s actual draft land capacity in units as reported by King County from the Urban Growth Capacity Study as it relates to capacity of other Cities – this is the low number under Sammamish’s descriptive statistics and Sammamish has ~12% of the land capacity in the Cities and Towns Geography group – if Sammamish’s growth allocation was based on its land capacity relative to other cities in the group, this is what it would be).

6. Other Factors:

Sammamish Housing Units Achieved from 2006-2019: 3,963 Units (reported through OFM Small Area Estimates - Sammamish constitutes 30% of the housing unit growth from 2009-2019 within the Cities and Towns Geography Group).

Total Cities and Towns Geography Group Capacity as reported by King County with Draft Urban Growth Capacity (UGCS): King County reports that there are ~26,381 units available in capacity in the Cities and Towns Geography group (~3,288 units are estimated as available in Sammamish -this is 12% of the capacity across the whole Cities and Towns Geography group).
Cities and Towns Geography: The Cities and Towns Geography group is made up of 19 cities with varying attributes.

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>2020 Existing Housing Units (Reported by OFM)</th>
<th>2006-2035 HU Target (CPP Adopted)</th>
<th>Land Area In Acres</th>
<th>2006-2019 HU Achieved (Reported by OFM)</th>
<th>Initial Draft UGCS HU Capacity (Provided by King County)</th>
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<td>303.28</td>
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<td>17</td>
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</tbody>
</table>

Sammamish Household Size Per OFM Data: 3.04 (this factor is not used but we wanted to include it for your awareness as to how we stack up as compared to the other cities in the Cities and Towns Geography group).

Next Geography Caucus Meeting Scheduled
The next Cities and Towns Geography Caucus meeting has been scheduled by King County for November 10, 2020 from 10-12 AM. The focus of this meeting will be on discussion of each City's attributes as it relates to growth, including past growth targets and the jobs/housing connection. In anticipation of the upcoming scheduled meeting, King County has prepared a short survey for each jurisdiction to complete with the purpose of promoting though and awareness of relevant factors related to growth. A copy of the survey is included as Exhibit 1.
The City can only complete this survey once and staff would benefit from City Council feedback on the survey questions before we complete the survey and submit it to King County. We do not anticipate discussion on actual Cities and Towns Geography Caucus group growth target setting with this next meeting. Rather, we expect the Caucus will be discussing preliminary capacity numbers (Sammamish makes up 12% of the preliminary capacity in the Caucus group) and each of the community's attributes, strengths, and weaknesses as it relates to growth allocation/targets. Following the November 10 meeting, a third meeting will be held with the Geography Caucus where we anticipate formal discussion on growth allocations/targets will occur (when we will talk about the actual numbers). Further meetings will be held as needed to continue the discussion with the Caucus and finalize growth allocations/targets within the group. This process is likely to continue into the winter months.

**Previous Council Discussions**

**October 6, 2020 Joint Planning Commission/City Council Meeting** - Discussion on Status of King County UGCS and update to king County CPPs.
ATTACHMENT 2: City of Sammamish Agenda Bill for March 17, 2020 City Council Regular Meeting
Subject: Town Center Work Program
Date Submitted: March 10, 2020
Department: Community Development

Needed from Council: ☐ Action  ☑ Direction  ☐ Informational

Recommendation: Direct staff to add Town Center Phase I code updates to the 2020 work program.

Exhibits:
1. Exhibit 1 - City Council Retreat Presentation
2. Exhibit 2 - Town Center QOL Workbook

Budget:
Total dollar amount: $150,000 allocated in the 2019-2020 Biennial Budget  ☑ Approved in budget
Fund(s): Economic Development - Prof Svs-Town Center Consultant (001-058-558-70-41-00)  ☐ Budget reallocation required  ☐ No budgetary impact

Work Plan Focus Areas:
☐ Transportation  ☐ Community Safety
☐ Communication & Engagement  ☑ Community Livability
☐ High Performing Government  ☐ Culture & Recreation
☐ Environmental Health & Protection  ☐ Financial Sustainability

Key Facts and Information Summary:
Summary Statement
In response to Council's request for a discussion on the Town Center regulations during the January 25, 2020 City Council Retreat, staff presented (Exhibit 1) the following four options related to Town Center for consideration:
Table 1:

<table>
<thead>
<tr>
<th>Option</th>
<th>Description</th>
<th>Cost</th>
<th>Timeline</th>
<th>Additional Work Needed</th>
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<td>1</td>
<td>Rewrite of the Town Center Sub-Area Plan and Development regulations</td>
<td>$500,000 - $700,000</td>
<td>4-5 years</td>
<td>New FEIS Required</td>
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<tr>
<td>2</td>
<td>Revise planning policies/goals for areas not docketed</td>
<td>$300,000 - $500,000</td>
<td>2-years</td>
<td>Addendum to the FEIS Required</td>
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<td>3</td>
<td>Revise planning policies/goals and related regulations for docked areas</td>
<td>Currently budgeted</td>
<td>18-months</td>
<td>Standard non-project SEPA</td>
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<tr>
<td>4</td>
<td>Revise Sammamish Municipal Code (SMC) regulations related to docketed areas</td>
<td>Currently budgeted</td>
<td>12-months</td>
<td>Standard non-project SEPA</td>
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</tbody>
</table>

Staff distributed a workbook (Exhibit 2) at the Retreat to assist each Councilmember in performing a gap analysis. Following the retreat, staff requested further feedback from Council on their preferred option to assist in finalizing the 2020 work program.

The feedback received from Councilmembers was helpful for understanding individual perspectives, but there did not appear to be clear direction on a desired path forward. In lieu of further individual work on the gap analysis workbook, staff received a request to schedule this topic for discussion among the full Council.

Without knowing the full Council’s direction, staff’s feeling is that there is interest in making immediate changes to the Town Center regulations codified in Chapter 21B SMC and in ensuring that the code is properly directing the implementation of the Town Center Vision. It is also staff’s feeling that there is substantial Council interest in further work on Town Center policy and regulations beyond a code update effort.

In response, staff are proposing a three-phased approach that incorporates options 2-4 identified in Table 1 to adequately address potential updates to Town Center policy and regulations. The justification for this phased process is due to the timing constraints on work that has not been docketed*. (See Docteted* explanation below).

- Council can update the Town Center code (development regulations) at any time; however those updates must conform to adopted policy.
- Council can update the Comprehensive Plan policies that have been formally docketed. Policies not on the docket must be added and can be updated the year after they are docketed.

For this reason the phased approach outlined below provides not only an immediate opportunity for action through targeted code changes, but it also provides a strategic process to get underway with policy changes, including the potential to docket further policy changes that are not already included on the docket.

**Phase 1 – Code Changes**

The scope of work for Phase 1 includes identifying areas within the Town Center Development Code (Chapter 21B SMC) that can be immediately amended in a manner that ensures existing Town Center
policies and goals are being implemented appropriately through code. To help assist in this effort, staff would examine public and staff review comments from past and current Town Center development proposals to help understand the issues within the Code. This is similar to the effort that yielded the changes made to the City’s R-Zone development regulations in 2019. This phase of work is already budgeted and would begin this summer with anticipated adoption in early 2021.

**Phase 2 – Currently Docketed Policy/Regulation Changes**
The scope of work for Phase 2 would be at the City Council’s discretion but limited to those items that have already been docketed (refer to option 3 in Table 1 above). This work includes:

- reviewing existing policy;
- completing a policy-to-code gap analysis;
- overseeing an extensive public engagement process; and
- seeing proposed amendments to planning policies and implementing regulations through the legislative process.

The approximate timeline would be 18 months starting in the fall of 2020 and concluding in early 2022. The budget to complete this work is dependent on the final scope of work directed by the City Council and may require a budget request for Council’s consideration of the 2021-2022 biennial budget.

**Phase 3 – Non-Docketed Policy/Regulation Changes**
The scope of work for Phase 3 includes amendments to existing policy or creation of new policy and amendments to associated regulations that the City Council was interested in bringing forward with Phase 1 or Phase 2 but were not docketed in 2019 (refer to option 2 in Table 1 above). This work includes:

- a review of existing polices and goals;
- identification of areas of deficiency not completed during Phase 2;
- taking proposed amendments or additions through the City’s docketing process;
- amending the Town Center Final EIS;
- overseeing an extensive public engagement process; and
- seeing the proposed amendments through the legislative process.

The approximate timeline would be 24 months starting in 2021 and concluding in early 2023. As with Phase 2, the budget to complete this work is dependent on the final scope of work directed by the City Council and may require a budget request for Council’s consideration of the 2021-2022 biennial budget. Phase 3 would include any work found necessary by the Council as part of Phase 1 or Phase 2 but that is outside of the scope of work for either of those phases.

*Docketed:*
Under State Law the City may amend the Comprehensive Plan no more than once per year. The City’s annual Comprehensive Plan Amendment Docket is the City’s official policy amendment work plan. This work plan includes items formally queued up for review by the City Council under SMC 24A.10.010. The Docket is cumulative and includes carryover items from years past; unless deliberately removed by the Council an item added to the Docket remains on the Docket. Once on the Docket, the Council may direct staff to proceed with legislative review of a specific item, however it must be added to the City’s work plan. That is, an item added to the Docket through the Docket process does not automatically get
added to the Council’s work plan due to budget and schedule constraints. The Council need not re-docket an item that was added in years past unless that item was formally removed by the Council or that item was acted upon by passing of Ordinance amending the Comprehensive Plan. The Town Center Quality of Life Amendments that were docketed under Resolution R2018-811 remain docketed and are available for activation by the Council. For this reason the Council may move forward with specific amendments topics already docketed, however new topics proposed to be added for consideration must be added following the formal docket process outlined in SMC 24A.10.

**Direction Needed**

Does the Council agree that this phased method of updating Town Center policies and regulations is appropriate?

**RELATED CITY GOALS, POLICIES, AND MASTER PLANS:**

- Town Center Plan
- Chapter 21B SMC - Town Center Development Regulations
Sammamish Growth
Planned vs. Actual

- Residential Growth Target (2006-2035): 2,000 units (Town Center Sub-Area), 2,640 units (Residential Zoning)
- Residential Units Built (2006-2018): 314 units (Town Center Sub-Area), 2,226 units (Residential Zoning)

12% of residential growth from 2006-2018 was in Town Center.

2019 Permits Finaled:
- Residential Zoning: 224 units
- Town Center Sub-Area: 8 units
SUBJECT: King County Countywide Planning Policies (CPP) Cities and Towns Caucus Growth Target

DATE SUBMITTED: March 12, 2021

DEPARTMENT: Community Development

NEEDED FROM COUNCIL: ☐ Action  ☑ Direction  ☐ Informational

RECOMMENDATION: Discuss revising the City's current (March 10, 2021) position on the City's growth target in the King County Countywide Planning Policies Cities and Towns Regional Geography Caucus. Provide direction to staff.

EXHIBITS: 1. Exhibit 1 -March 9 CPP Caucus Growth Target Position Memo

BUDGET:
Total dollar amount N/A  ☐ Approved in budget  ☑ No budgetary impact
Fund(s) N/A  ☐ Budget reallocation required

WORK PLAN FOCUS AREAS:
☐ Transportation  ☐ Community Safety
☐ Communication & Engagement  ☑ Community Livability
☐ High Performing Government  ☐ Culture & Recreation
☐ Environmental Health & Protection  ☑ Financial Sustainability

NEEDED FROM COUNCIL:
Should the Council direct staff to adjust the City's current (March 10, 2021) growth target position in the King County Countywide Planning Policies Cities and Towns Regional Geography Caucus?

KEY FACTS AND INFORMATION SUMMARY:
During the March 9, 2021 City Council Study Session staff received direction on the City's growth target position for the March 10, 2021 King County Countywide Planning Policies Cities and Towns Regional Geography Caucus meeting. Staff attended the meeting and presented the position outlined in the March 9, 2021 position memo included as Exhibit 1.

The position presented included:

**Housing Units:** 885 (661 “pipeline” + 224 “new through 2044” = 885 housing units)

**Jobs:** 305 (304 “pipeline” + one “new through 2044” = 305 jobs)
The position was affirmed and accepted as reasonable and was not further discussed. Based on growth target positions presented by a majority of the members of the Cities and Towns Caucus group, the group’s housing unit target of 13,985 (5% of the King County share of the region’s growth) will be exceeded/surpassed by a few thousand units. King County representatives asked if any of the member cities were interested in revising their targets to reduce the number of units. Following the meeting a summary communication was sent to the City Council and identified that the Caucus anticipates an overrun of the 13,985 unit allocation by several thousand units (based on preliminary numbers and still missing smaller city positions). Should the Council with to amend/adjust the City’s growth target position, additional direction to staff would be needed, including justification for that adjustment. Unless we request an adjustment, our position (growth target numbers) as outlined in the attached memo (Exhibit 1) are the numbers that have been provided to the Caucus and currently stands as what King County is including as Sammamish’s King County Countywide Planning Policy Growth Target to be used by King County in the next phase of their CPP update process.

**QUESTION:** Does the City Council wish to amend/adjust the City’s King County Countywide Planning Policy Growth Target position within the Cities and Towns Caucus?

**REFINEMENT:** If yes, what is an appropriate growth target position for the City and what is the rationale?

There is some leeway in the King County CPP growth target vs. the City’s Comp Plan target. If the gap is too great, it is problematic in attaining certification of the Comp Plan. For example, if we lower our CPP target due to sewer constraints, road constraints, school constraints, and also due to pipeline project uncertainty, and over the next three years (the next major City Comp Plan Update is due for completion in 2024) additional capacity is unlocked if interim sewer capacity measures/solutions are identified, EIS and ensuing actions/investments results in added road capacity, schools receive funding to build new schools, etc., and we identify that as part of the Comp Plan we need to plan for more units than we have in our CPP target (e.g. expectations regarding development have changed), so long as the difference is not extreme (e.g. more than 200 or 300 units), certification should not be a problem. However, if Sammamish’s King County CPP growth target is too low, and the 2024 City Comp Plan housing and jobs target ends up resulting in a larger gap (due to information/changes in the years leading up to the 2024 major City Comp Plan update), the King County CPP target may need to be amended upward to account for the discrepancy which results in a much more complicated process. The target we set now is important to our actions later as part of the 2024 City major Comp Plan update. The optimal position is one that is as closely aligned to capacity as possible while considering infrastructure limitations.

**Issues for Consideration:**

**Issue #1:** We cannot erase or delete housing or job pipeline units (661 housing units and 304 jobs in pipeline from 2019 forward) and must account for them in our 2019-2044 King County CPP target. However, there is uncertainty as to if these units will all actually be built, if they are not and projects are cancelled, we will still retain the number in the growth target (if a project is cancelled the number is not automatically reduced to reflect the project being removed).

**Issue #2:** We have 885 housing units remaining in our last (2006-2035) KC CPP target.

**Issue #3:** We cannot set a target that is less than our pipeline for jobs or housing (661 housing units and 304 jobs).
**Issue #4:** We should not set a target of zero new housing units (excluding the 661 pipeline units) when our future development capacity for housing units shown in the UGCS is 483 housing units (UGCS capacity of 1,144 minus 661 pipeline = 483) and natural growth will continue. We estimate ~646 vacant parcels outside of sewer constrained areas. While many of these parcels were removed as part of the UGCS due to ownership, constraints, or other factors, many of them are still considered to be developable with one new single-family residence. It would not be unrealistic to expect that many of these parcels could be built on with new single-family residences as “natural growth” (e.g. one new home on one existing new lot) over the next 25 years (through 2044). These are vacant residential lots that are not subject to the SPWSD moratorium, not subject to school concurrency, and not subject to the traffic concurrency moratorium. Outside of zoning controls, critical areas, and development regulations, there is nothing stopping them from being built on.

**Issue #5:** We can set a target of one (1) new job (excluding the 304 pipeline jobs) as our future development capacity for jobs shown in the UGCS is one new job.

**Issue #6:** If road, sewer, or school infrastructure capacity is added at some level in next planning horizon it will be harder to update the comprehensive plan and may require modifying the City’s CPP target if it is set too low (e.g. zero). Planning for minimal baseline/natural growth that more closely matches new development capacity and pipeline units is more realistic.

**Issue #7:** Outside interests.

**Issue #8:** We will be going through this process again in ~eight years. Additional information on the Comprehensive Plan Periodic Update Process is available at [MRSC](#). The City needs to address the infrastructure service constraints and issues during the next planning horizon and intends to use the upcoming planning period to lay a stronger foundation for future growth by working with partners to address sewer/wastewater, road, and school infrastructure gaps. This will be reflected in the periodic update to the Comprehensive Plan and is reflected in the requested growth targets. While the target is for a planning horizon of 2019-2044, we will have opportunity to assess this again in ~8 years.
To: Dave Rudat, City Manager  
From: David Pyle, Director, Department of Community Development  
Date: March 9, 2021  
Re: March 10, 2021 King County Countywide Planning Policies (CPP) Cities and Towns Geography Caucus Growth Target Discussion – Housing and Jobs Growth Targets

At the upcoming King County March 10, 2021 Cities and Towns Geography Caucus meeting City staff representatives will be asked to present their position on proposed housing and job growth targets. In anticipation of this meeting, and following City Council discussion and direction during the March 2, 2021 Sammamish City Council meeting, staff have continued with the final stages (Phase IV) of the King County Urban Growth Capacity Study (UGCS) and have weighed the City’s draft UGCS final land capacity with the objectives of growth target setting. This memo outlines our findings and presents a possible position for Sammamish at the March 10, 2021 Caucus meeting.

Data Points For Consideration:

1) Draft UGCS Housing and Job Capacity Results:
   a. Housing Capacity: 1,144 housing units (from UGCS Phase IV Draft Final Capacity Report sent to King County on 03/09/2021 - see Table 4 below)
      i. Pipeline Capacity: 661 housing units
      ii. New Development Capacity: 483 housing units
   b. Jobs: 305 jobs (from UGCS Phase IV Draft Final Capacity Report sent to King County on 03/09/2021 - see Table 4 below)
      i. Pipeline Capacity: 304 jobs
      ii. New Development Capacity: One (1) Job

   Description: This is the City’s draft Final Capacity for housing units reported from the UGCS. This number includes “pipeline units” (see #3 and #5 below) and has been adjusted to reflect the sewer capacity constraints reported by SPWSD. The draft UGCS Final Capacity roll-up report is included as Table 4 below. Based on the UGCS formulas and methodology, if the City’s UGCS report is accepted by King County (we send them our final “draft” and the County reviews) then King County would consider Sammamish to have 1,144 units of capacity for housing and capacity for 305 jobs. These numbers are baselines for regional planning. This includes 483 units of development capacity as well as 661 “pipeline units” for a total of 1,144 units of housing capacity. This also includes 304 “pipeline jobs” and one (1) job from development capacity for a total of 305 jobs. This report is baselined in 2019 data. Please see Table 4 below.

2) Previous CPP Growth Target Remaining Housing Units: 885
Description: This is the number of housing units that remain from the 2006-2035 previously adopted King County CPP growth target as of 2019. It is important to note that in the arena of growth target goal setting for King County CPP updates, what is most important is understanding and using data that is used by King County. That is, to best understand how a possible King County CPP growth target might measure up against past growth performance on a King County level, we need to use the same data used by King County. So, to understand 1) What the City’s past King County CPP assigned growth target was, and 2) How many units remain in this past King County CPP growth target, we engaged King County directly to ask them (as opposed to City staff attempting to calculate how many units King County considers as remaining) - we felt it best to ask King County directly to provide this number to the City. In response to this inquiry, we met with King County following their pulling data. In 2019 King County has reported to the City that the City has completed 3,963 housing units from the 2035 adjusted target of 4,849 housing units with 885 (or 886 depending on how you round decimals) units remaining in the 2035 growth target as of 2019.

3) Pipeline Housing Units In-Process: 661 Housing Units (see Table 4)
   a. Town Center Housing Units: There are 392 pipeline housing units in Town Center
   b. Residential District Housing Units: There are 269 pipeline housing units in the R-Districts

Description: This is the number of units that are currently in process in some phase of entitlement or construction (or even complete and occupied) as of 2019. See draft UGCS roll-up report included as Table 4 below. These units are included in the UGCS report and will be counted as part of the City’s progress towards the 2044 housing unit target. We cannot arbitrarily erase or delete these units from the UGCS report as these projects are all at some point in entitlement or construction.

4) New Units – Pipeline Units vs. Previous CPP Target Remainder: There is a difference of 224 new units between the previous CPP target remainder (885) and pipeline units in process (661).

Description: This is the difference between the balance of the past housing target (885 remaining units – see item #2 above) and the pipeline units (661 – see #3 above). That is, this is the number of units that would be the effective new target if the City received a CPP target of 885 units for 2019-2044 (Calculation: #2 [885] minus #3 [661] = #4 [224]). This is because there are already units in the pipeline that we cannot erase; these pipeline units will likely be built by end of 2024 (at least in part and we cannot delete these units), and the 224 new units (beyond the 661 pipeline units) would be the effective target for 2044. Under this premise, and assuming the 661 are built by ~2024, we would have an effective target of 224 between ~2025 and 2044, or around 11 or 12 units per year between 2025 and 2044. Under this scenario, the City’s King County CPP target for 2019-2044 would be 885 units, of these there are 661 in the pipeline and 224 would be “new”. It is also important to note that if any of the 661 pipeline units fail to reach construction and end up being removed from the list of pipeline projects, we would still retain the number of units in our growth target. For example, if the 154 units from the R-4 zone (see Table 4) were for some reason to not be built and expired due to delay or inactivity, then we would still have a target of 885 units. In this sense, even though we need to count the pipeline units and cannot arbitrarily remove the pipeline units from consideration; if our target includes these units and they later disappear we are still required to account for them in meeting our target over the planning cycle.

5) New Pipeline Jobs: The UGCS Final Capacity Study is reporting 305 new jobs in the pipeline (see Table 4).
   a. Job Capacity from Development: There is one (1) job reported as capacity from development.
   b. Town Center Jobs: There are 222 TC jobs in the pipeline in Town Center.
   c. Residential District Jobs: There are 83 jobs in the pipeline in the R-Districts (new school that is under construction).

(NOTE: Jobs are rounded in the UGCS causing the difference in math of 304 vs. 305.)
Description: This is the number of jobs that are reported from the UGCS Final Capacity report and includes one (1) job from development capacity and 305 jobs currently in process in some phase of entitlement or construction as of 2019. See draft UGCS roll-up report included as Table 4 below. Under this scenario, the City’s King County CPP target for 2019-2044 would be 305 jobs, of these there are 304 in the pipeline and one (1) would be “new”. It is also important to note that if any of the 304 pipeline jobs fail to reach construction and end up being removed from the list of pipeline projects, we would still retain the number of jobs in our growth target. For example, if the 222 jobs from the TC-A1 zone (see Table 4) were for some reason to not be built due to complications with the project, then we would still have a target of 305 jobs. In this sense, even though we need to count the pipeline jobs and cannot arbitrarily remove the pipeline jobs from consideration; if our target includes these jobs and they later disappear we are still required to account for them in meeting our target over the planning cycle.

Issues for Consideration:

Issue #1: We cannot erase or delete housing or job pipeline units (661 housing units and 304 jobs in pipeline from 2019 forward) and must account for them in our 2019-2044 King County CPP target.

Issue #2: We have 885 housing units remaining in our last (2006-2035) CPP target; requesting less than 885 would be a retroactive adjustment to the last assignment and would be cancelling a prior regional commitment.

Issue #3: We cannot set a target that is less than our pipeline for jobs or housing (661 housing units and 304 jobs).

Issue #4: We cannot set a target of zero new housing units (excluding the 661 pipeline units) when our future development capacity for housing units shown in the UGCS is 483 housing units (UGCS capacity of 1,144 minus 661 pipeline = 483) and natural growth will continue.

Issue #5: We can set a target of one (1) new job (excluding the 304 pipeline jobs) as our future development capacity for jobs shown in the UGCS is one new job.

Issue #6: If road, sewer, or school infrastructure capacity is added at some level in next planning horizon it will be harder to update the comprehensive plan and may require modifying the City’s CPP target if is set too low (e.g. zero). Planning for minimal baseline growth that matches new development capacity and pipeline units is more realistic.

Issue #7: Outside interests.

Cities and Towns Geography Caucus Growth Target Discussions:

1) **CURRENT INITIAL POSITION:** February 23, 2021 Sammamish Initial Preliminary Targets (proposed at February 23, 2021 King County Cities and Towns Geography Caucus meeting):
   a. Housing Units: 885
   b. Jobs: 10

2) **PROPOSED POSITION:** March 10, 2021 Sammamish Preliminary Targets (proposed position for March 10, 2021 King County Cities and Towns Geography Caucus meeting):
   a. Housing Units: 885 (661 “pipeline” + 224 “new through 2044” = 885 housing units)
   b. Jobs: 305 (304 “pipeline” + one “new through 2044” = 305 jobs)
TABLE 4: Draft UGCS Phase IV Results – Final Capacity (Includes constraints identified by SPWSD)

<table>
<thead>
<tr>
<th>Development in New Areas</th>
<th>Final Capacity</th>
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</thead>
<tbody>
<tr>
<td>Residential Units</td>
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<tr>
<td>Commercial Units</td>
<td></td>
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<tr>
<td>Industrial Units</td>
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<tr>
<td>Agriculture</td>
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March 10, 2021 King County Countywide Planning Policies (CPP) Cities and Towns Geography Caucus Growth Target Discussion
King County CPP Housing and Jobs Growth Targets

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- The CPPs should not include parking requirements if they reduce land available for open space.
- The CPPs should include policies concerning urban agriculture and preservation of open space for this purpose. This is an important way for families to grow culturally relevant foods.
- The CPPs should specifically emphasize safe and healthy housing for all residents of King County.
- The CPPs should include policies for flood management, especially as it relates to climate change.
- The CPPs should ensure that climate change, emergency management, and equity are intertwined concepts in the CPPs.
- The CPPs should include policies that provide pathways for immigrants and refugees to become first responders. This ensures frontline communities at the most risk to the effects of climate change are helped by members of their community and have critical information presented to them in the languages they understand during emergencies.
Comments from meeting with the King County Equity Mobility Cabinet

4/20/2021

- The COVID-19 pandemic has had measurable effects on growth and development patterns and the CPPs and growth targets should reflect this.
- Accessible broadband should be included in the CPPs.
- Interpreters should be included at public meetings to ensure all King County residents have access to the decision making process.
- Cities and the County should work to build engagement capacity over time and include community members early in policy decisions and processes.
- Concentrating all growth into regional growth centers makes those centers very expensive. The CPPs should encourage jurisdictions to create moderate density housing along transit corridors, bus routes, and high-capacity transit.
- Community liaisons are a vital component of outreach and the CPPs should guide cities to hire outreach experts to build capacity and solicit feedback early and often. Engagement is extraordinarily important, and jurisdictions should use a big net to include as many people as possible in planning decisions.
- The CPPs should include policies that prevent displacement of people.
2021 Countywide Planning Policies Update

Date: May 4, 2021

To: Karen Wolf, Sr. Policy Analyst, KCEO/PSB: karen.wolf@kingcounty.gov
Rebecca Maskin, Demographer, KCEO/PSB: rmaskin@kingcounty.gov

Subject: Countywide Planning Policies Update—Public Review Draft Comments

The undersigned King County Rural Area Unincorporated Area Councils / Unincorporated Area Associations / Organizations seek to “Keep the Rural Area Rural.” We commenced our efforts 15 months ago with a complete review of the 2016 Countywide Planning Policies (CPPs). Herein, as part of our continuing efforts on the ongoing 2021 CPP Update, we provide our detailed comments on its Public Review Draft (PRD).

We provide both a Rural Area perspective and a regional perspective, particularly in the key areas of Environment and Transportation. Our recommended changes to the March 31, 2021, PRD are shown in yellow highlighted red. Where warranted, we include supporting rationale, in the “Reason for Change/MPP/Notes” column (righthand side). We do not include any comments on the Appendices, as both the A1. Land-Use Map and A2. Potential Annexation Areas Map have yet to be updated.

Should you have any questions, please contact our undersigned CPP Coordinator. Thank you.

Submitted by:

Peter Rimbos
primbos@comcast.net
Coordinator, CCP Updates, GMVUAC

Approved by:

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cc: King County Council, council@kingcounty.gov
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John Taylor, Director, KC Dept. of Local Services (DLS): John-Dir.Taylor@kingcounty.gov
David Daw, External Relations Manager, KC DLS: ddaw@kingcounty.gov
Table of Contents

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2021 CPP Update Appendices

Appendix 1: Land Use Urban Growth Area Boundary Map (format being updated; forthcoming)

Appendix 2: Potential Annexation Areas Map (format being updated; forthcoming)

Appendix 3: Urban Separators Maps (to be included unchanged)

Appendix 4: Housing Technical Appendix (text being updated, forthcoming)

Appendix 5: King County School Siting Task Force Report (to be included unchanged)

Appendix 6: King County Centers Framework (new; attached)

Glossary (text being updated; forthcoming)
# King County Countywide Planning Policies

Proposed new language and new policies are underlined and proposed deletions are crossed out.

<table>
<thead>
<tr>
<th>2021 CPP #</th>
<th>2012 CPP #</th>
<th>Policy/Action</th>
<th>Reason for Change/MPP/ Notes</th>
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</thead>
<tbody>
<tr>
<td><strong>Amendments</strong></td>
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</table>
| G-1       | G-1       | Maintain the currency of the Countywide Planning Policies through periodic review and amendment. Initiate and review all amendments at the Growth Management Planning Council through the process described below:  
  a) Only the Growth Management Planning Council may propose amendments to the Countywide Planning Policies except for amendments to the Urban Growth Area that may also be proposed by King County in accordance with policies DP-15 and DP-16 to DP-17;  
  b) Growth Management Planning Council recommends amendments to the King County Council for consideration, possible revision, and approval; proposed revisions by the King County Council that are of a substantive nature may be sent to the Growth Management Planning Council for their consideration and revised recommendation based on the proposed revision;  
  c) A majority vote of the King County Council both constitutes approval of the amendments and ratification on behalf of the residents of Unincorporated King County;  
  d) After approval and ratification by the King County Council, amendments are forwarded to each city and town for ratification. Amendments cannot be modified during the city ratification process; and  
  e) Amendments must be ratified within 90 days of King County approval and require affirmation by the county and cities and towns representing at least 70 percent of the county population and 30 percent of those jurisdictions. Ratification is either by an affirmative vote of the city’s or town’s council or by no action being taken within the ratification period. | Note: Updated to cover all three relevant policies.                                                                                   |

# Monitoring

<table>
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<tr>
<th>2021 CPP #</th>
<th>2012 CPP #</th>
<th>Policy/Action</th>
<th>Reason for Change/MPP/Notes</th>
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<tbody>
<tr>
<td>G-2</td>
<td>G-2</td>
<td>Monitor and benchmark the progress of the Countywide Planning Policies towards achieving the Regional Growth Strategy inclusive of the environment, development patterns, housing, the economy, transportation and the provision of public services. Identify corrective actions to be taken if progress toward benchmarks is not being achieved.</td>
<td>Note: No change proposed.</td>
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<tr>
<td><strong>Investment</strong></td>
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<td>G-3</td>
<td>G-3</td>
<td>Work collaboratively to identify and seek regional, state, and federal funding sources to invest in infrastructure, strategies, and programs to enable the full implementation of the Countywide Planning Policies. Balance needed regional investments with local needs when making funding determinations.</td>
<td>Note: No change proposed.</td>
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<tr>
<td><strong>Consistency</strong></td>
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<td>G-4</td>
<td>G-4</td>
<td>Adopt comprehensive plans that are consistent with the Countywide Planning Policies as required by the Growth Management Act.</td>
<td>Note: No change proposed.</td>
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<tr>
<td><strong>Environment</strong></td>
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<td><strong>Environmental Sustainability</strong></td>
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<td>EN-1</td>
<td>EN-1</td>
<td>Incorporate environmental protection and restoration efforts including climate action, mitigation, and resilience into local comprehensive plans to ensure that the quality of the natural environment and its contributions to human health and vitality are sustained now and for future generations.</td>
<td>Note: Revised to be broader in scope and include climate Action, mitigation and resilience.</td>
</tr>
<tr>
<td>EN-2 (proposed numbering) New Policy</td>
<td>Develop and implement environmental strategies using integrated and interdisciplinary approaches for environmental assessment and planning, in coordination with local jurisdictions, tribes, and countywide planning groups.</td>
<td>MPP-EN-1 Develop and implement regionwide environmental strategies, coordinating among local jurisdictions, tribes, and countywide planning groups.</td>
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<td>MPP-EN-2 Use integrated and interdisciplinary approaches for environmental planning and assessment at regional, countywide, and local levels.</td>
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</table>
**Encourage** Ensure public and private projects to incorporate locally appropriate low impact development approaches, developed using a watershed planning framework, for managing stormwater, protecting water quality, minimizing flooding and erosion, protecting habitat, and reducing greenhouse gas emissions.

**Reduce stormwater impacts from transportation and development through watershed planning, redevelopment and retrofit projects, and low-impact development.**

*Note: The tenets of LID tools are excellent techniques to bring our hydrologic regimes closer to predevelopment character via retaining water on-site, but some have proven difficult to install and maintain, and as a result ineffective despite expensive price tags. One size does not fit all for exact LID methods and therefore should be tailored to individual city’s needs.*

**Encourage** the transition to a sustainable energy future by reducing demand through planning for efficiency and conservation, supporting development of energy management technology such as advanced thermostats or software that optimizes usage, and by meeting reduced needs from sustainable sources.

**Pursue the development of energy management technology as part of meeting the region’s energy needs.**

*links to both Economic disparities and to Green jobs etc.*

**Promote** demand management and the conservation of services and facilities prior to developing new facilities.

**Maintain and, where possible, improve** air and water quality, soils, and natural systems to ensure the health and well-being of people, animals, and plants. Reduce the impacts of transportation on air and water quality, and climate change.

**Designate, protect, and enhance** significant open spaces, natural resources, and critical areas through mechanisms, such as the review and comment of countywide planning policies and local plans and provisions.

**Identify and protect** wildlife corridors both inside and outside the urban growth area.

**Note: Policy moved to the Open Space sub-chapter of the Environment chapter between EN-22 and EN-23**

### Table of Changes

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<tr>
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<tr>
<td>EN-3</td>
<td>EN-2</td>
<td><strong>Encourage</strong> Ensure public and private projects to incorporate locally appropriate low impact development approaches, developed using a watershed planning framework, for managing stormwater, protecting water quality, minimizing flooding and erosion, protecting habitat, and reducing greenhouse gas emissions.</td>
<td><strong>MPP-EN-18</strong> Reduce stormwater impacts from transportation and development through watershed planning, redevelopment and retrofit projects, and low-impact development. <em>Note: The tenets of LID tools are excellent techniques to bring our hydrologic regimes closer to predevelopment character via retaining water on-site, but some have proven difficult to install and maintain, and as a result ineffective despite expensive price tags. One size does not fit all for exact LID methods and therefore should be tailored to individual city’s needs.</em></td>
</tr>
<tr>
<td>EN-4</td>
<td>EN-3</td>
<td>Encourage the transition to a sustainable energy future by reducing demand through planning for efficiency and conservation, supporting development of energy management technology such as advanced thermostats or software that optimizes usage, and by meeting reduced needs from sustainable sources.</td>
<td><strong>MPP-CC-5</strong> Pursue the development of energy management technology as part of meeting the region's energy needs. <em>links to both Economic disparities and to Green jobs etc.</em></td>
</tr>
</tbody>
</table>
| EN-5       | EN-4       | Identify and preserve regionally significant open space networks in both Urban and Rural Areas. Develop strategies and funding to protect lands that provide the following valuable functions:  
  - Physical or visual separation delineating growth boundaries or providing buffers between incompatible uses;  
  - Active and passive outdoor recreation opportunities;  
  - Wildlife habitat and migration corridors that preserve and enhance ecosystem resiliency in the face of urbanization and climate change;  
  - Preservation of ecologically sensitive, scenic, or cultural resources;  
  - Urban green space, habitats, and ecosystems;  
  - Forest resources; and  
  - Food production potential. | **MPP-EN-3** Maintain and, where possible, improve air and water quality, soils, and natural systems to ensure the health and well-being of people, animals, and plants. Reduce the impacts of transportation on air and water quality, and climate change.  
**MPP-EN-11** Designate, protect, and enhance significant open spaces, natural resources, and critical areas through mechanisms, such as the review and comment of countywide planning policies and local plans and provisions.  
**MPP-EN-14** Identify and protect wildlife corridors both inside and outside the urban growth area. **Note: Policy moved to the Open Space sub-chapter of the Environment chapter between EN-22 and EN-23** |
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<tbody>
<tr>
<td>EN-6</td>
<td>EN-5</td>
<td>Ensure all residents of the region regardless of race, social, or economic status have a clean and healthy environment. Identify and mitigate unavoidable negative impacts of public actions that disproportionately affect people of color and low-income populations those frontline communities that are disproportionately impacted due to existing and historical racial, social, environmental, and economic inequities, and who have limited resources or capacity to adapt to a changing environment.</td>
<td>MPP-EN-4 Ensure that all residents of the region, regardless of race, social, or economic status, have clean air, clean water, and other elements of live in a healthy environment, with minimal exposure to pollution.  Note: Add Front Line Communities definition to Glossary. Frontline communities are those that are disproportionately impacted by climate change due to existing and historical racial, social, environmental, and economic inequities, and who have limited resources and/or capacity to adapt. These populations often experience the earliest and most acute impacts of climate change, but whose experiences afford unique strengths and insights into climate resilience strategies and practices. Frontline communities include Black, Indigenous, and People of Color (BIPOC) communities, immigrants and refugees, people living with low incomes, communities experiencing disproportionate pollution exposure, women and gender non-conforming people, LGBTQIA± people, people who live and/or work outside, those with existing health issues, people with limited English skills, and other climate vulnerable groups. Source for “frontline communities” definition: <a href="https://your.kingcounty.gov/dnrp/climate/documents/2020-SCAP-Full-Plan.pdf">https://your.kingcounty.gov/dnrp/climate/documents/2020-SCAP-Full-Plan.pdf</a>, Appendix 1: Glossary of Terms, Page 288</td>
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**Earth and Habitat**
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<tr>
<td>EN-7</td>
<td>New Policy</td>
<td>Locate development in a manner that minimizes impacts to natural features through the use of environmentally sensitive development practices that take into account design, materials, construction, and ongoing maintenance.</td>
<td><strong>MPP-EN-5</strong> Locate development in a manner that minimizes impacts to natural features. Promote the use of innovative environmentally sensitive development practices, including design, materials, construction, and on-going maintenance. While we strongly support this new policy, we have great concern that urban and urban-serving facilities often are considered to be located in the Rural Area to minimize land-acquisition costs. Such short-term thinking often can result in long-term environmental impacts when infrastructure for such facilities eventually are needed or simply when existing infrastructure needs to be expanded to ensure proper functioning of the facility. All the more reason why such urban and urban-serving facilities should be located within the Urban Growth Area.</td>
</tr>
<tr>
<td>EN-8</td>
<td>EN-6</td>
<td>Coordinate approaches and standards for defining and protecting critical areas, especially where such areas and impacts to them cross jurisdictional boundaries.</td>
<td>No change.</td>
</tr>
<tr>
<td>EN-9</td>
<td>New Policy</td>
<td>Use the best available science when establishing and implementing environmental standards.</td>
<td><strong>MPP-EN-6</strong> Use the best information available at all levels of planning, especially scientific information, when establishing and implementing environmental standards established by any level of government.</td>
</tr>
<tr>
<td>EN-10</td>
<td>EN-7</td>
<td>Encourage basin-wide approaches to wetland protection, preserving and enhancing the highest quality wetlands and wetland systems.</td>
<td>No change. Note: Policy moved to Water Resources sub-chapter of the Environment chapter, between EN-18 and EN-19</td>
</tr>
<tr>
<td>EN-11</td>
<td>EN-8</td>
<td>Develop an integrated and comprehensive approach to managing fish and wildlife habitat conservation, especially protecting to accelerate recovery, focusing on enhancing the habitat of iconic species like salmon, orca and other endangered, threatened, and sensitive species.</td>
<td><strong>MPP-EN-16</strong> Preserve and enhance habitat to support healthy wildlife and accelerate the recovery of salmon, orca, and other threatened and endangered species and species of local importance prevent species from inclusion on the Endangered Species List to accelerate their removal from the list.</td>
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<td>EN-12</td>
<td>New Policy</td>
<td>Reduce and mitigate air, noise, and light pollution caused by transportation, industries, public facilities, hazards and other sources. Prioritize reducing these impacts on vulnerable populations and areas that have been disproportionately affected.</td>
<td>MPP-EN-7 Reduce and mitigate noise and light pollution caused by traffic transportation, industries, public facilities, and other sources. MPP-EN-8 Reduce impacts to vulnerable populations and areas that have been disproportionately affected by noise, air pollution, or other environmental impacts.</td>
</tr>
<tr>
<td>EN-13</td>
<td>New Policy</td>
<td>Ensure that new development, open space protection efforts, and mitigation projects support the State’s streamflow restoration law, in order to promote robust, healthy, and sustainable salmon populations, and other ecosystem functions working closely within Water Resource Inventory Areas that encompass King County, and utilizing adopted watershed plans.</td>
<td>Note: This new policy addresses state law decisions adopted in light of the Hirst Decision, and the newly required planning, land use and ecological restoration efforts.</td>
</tr>
<tr>
<td>EN-14</td>
<td>EN-9</td>
<td>Implement salmon habitat protection and restoration priorities in approved Water Resource Inventory Area plans.</td>
<td>No change.</td>
</tr>
<tr>
<td>EN-15</td>
<td>New Policy</td>
<td>Enhance the urban tree canopy to provide wildlife habitat, support community resilience, mitigate urban heat, manage stormwater, conserve energy, improve mental and physical health, and strengthen economic prosperity. Prioritize places where Black, Indigenous, and other people of color, low income, and frontline community members live.</td>
<td>MPP-EN-9 Enhance urban tree canopy to support community resilience, mitigate urban heat, manage stormwater, conserve energy, improve mental and physical health, and strengthen economic prosperity. Note: Additional text to address inequities</td>
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**Flood Hazards**

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<tr>
<td>EN-16</td>
<td>EN-10</td>
<td>Coordinate and fund holistic flood hazard management efforts through the King County Flood Control District.</td>
<td>Note: Edit to reflect multiple approaches used to address these issues – programmatic, planning, restoration, capital projects, etc.</td>
</tr>
<tr>
<td>EN-17</td>
<td>EN-11</td>
<td>Work cooperatively to meet regulatory standards for floodplain development as these through inter-jurisdictional collaboration. These standards are regularly updated for consistency with relevant federal requirements, including those related to the Endangered Species Act.</td>
<td>Note: Minor text edits.</td>
</tr>
<tr>
<td>EN-18</td>
<td>EN-12</td>
<td>Work cooperatively the Cooperate with federal, state, and regional agencies and forums to develop regional levee maintenance standards that ensure public safety and protect habitat.</td>
<td>No Change.</td>
</tr>
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</table>
## Water Resources

| EN-10 | EN-7 | Encourage basin-wide approaches to wetland protection, emphasizing preservation and enhancement of the highest quality wetlands and wetland systems. |
| EN-19 | EN-13 | Collaborate with the Puget Sound Partnership to implement the Puget Sound Action Agenda and to coordinate land use and transportation plans and actions for the benefit of Puget Sound and its watersheds. |
| EN-20 | EN-14 | Manage natural drainage systems to improve water quality and habitat functions, minimize erosion and sedimentation, protect public health, reduce flood risks, and moderate peak storm water runoff rates. Work cooperatively among local, regional, state, national and tribal jurisdictions to establish, monitor and enforce consistent standards for managing streams and wetlands throughout drainage basins. |
| **EN-21** | New Policy | Support and incentivize environmental stewardship on private and public lands to protect and enhance habitat, water quality, and other ecosystem services, including protection of watersheds, critical aquifer recharge. In particular, protect wellhead areas that are sources of the region’s drinking water supplies and salmon- (and other endangered species) bearing streams. |
| EN-22 | EN-15 | Establish a multijurisdictional approach for funding and monitoring water quality, quantity, biological conditions, and outcome measures and for improving the efficiency and effectiveness of monitoring efforts. |

*Note: Policy moved from Earth and Habitat sub-chapter of the environment chapter to this location in the Water Resources sub-chapter of the Environment chapter. Otherwise no change to existing policy.*

**MPP-EN-17** Maintain and restore natural hydrological functions and water quality within the region’s ecosystems and watersheds to recover the health of Puget Sound and, where feasible, restore them to a more natural state.

**No change.**

**MPP-EN-10** Support and incentivize environmental stewardship on private and public lands to protect and enhance habitat, water quality, and other ecosystem services, including protection of watersheds and wellhead areas that are sources of the region’s drinking water supplies. Aquifer recharge should be recognized here.

While we agree with this new policy, unfortunately King County already is violating it as it nears possibly permitting an Asphalt Facility along the Cedar River and above wellhead areas. We cannot understand such conflicts and blatant violation of policy.

**No change.**

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**Open Space**
Identify and preserve regionally significant open space networks in both Urban and Rural Areas through implementation of the Regional Open Space Plan. Develop strategies and funding to protect lands that provide the following valuable functions:

- Ecosystem linkages crossing jurisdictional boundaries;
- Physical or visual separation delineating growth boundaries or providing buffers between incompatible uses;
- Active and passive outdoor recreation opportunities;
- Wildlife habitat and migration corridors that preserve and enhance ecosystem resiliency in the face of urbanization and climate change;
- Preservation of ecologically sensitive, scenic, or cultural resources;
- Urban green space, habitats, and ecosystems;
- Forest resources; and
- Food production potential.

Note: Policy moved from the Environmental Sustainability sub-chapter of the Environment chapter to this location in the Open Space sub-chapter of the Environment chapter.

Maintain and, where possible, improve air and water quality, soils, and natural systems to ensure the health and well-being of people, animals, and plants. Reduce the impacts of transportation on air and water quality, and climate change.

Designate, protect, and enhance significant open spaces, natural resources, and critical areas through mechanisms, such as the review and comment of countywide planning policies and local plans and provisions.

Designate, protect, and enhance significant open space networks and linkages across jurisdictional boundaries through implementation and update of the Regional Open Space Conservation Plan.

Identify and protect wildlife corridors both inside and outside the urban growth area.

Preserve and restore native vegetation and tree canopy, especially where it protects habitat and contributes to overall ecological function.

Preserve and restore native vegetation and tree canopy to protect habitat, especially where it protects habitat and contributes to the overall ecological function and where invasive species are a significant threat to native ecosystems.

Provide parks, trails, and open space within walking distance of urban area residents. Prioritize historically underserved communities for open space improvements and investments.

Provide parks, trails, and open space within walking distance of urban residents. Prioritize historically underserved communities for open space improvements and investments.
<table>
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<tr>
<th>EN-26 (proposed numbering)</th>
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<tr>
<td><strong>EN-26 (proposed numbering)</strong></td>
<td>New Policy</td>
<td>Reduce and promote alternatives to the use of toxic pesticides, fertilizers, and other products to minimize risks to human health and the environment. Employ Integrated Pest Management (IPM) strategies to prevent and address pest problems and to minimize the use of chemical pesticides.</td>
<td><strong>MPP-EN-19</strong> Reduce the use of toxic pesticides, and chemical fertilizers, and other products to the extent feasible and identify alternatives that minimize risks to human health and the environment. IPM policy and supporting guidelines aim to: (1) Reduce the potential impact of pesticide use on listed species such as the Puget Sound salmon; (2) Result in better long-term management of vegetation and pest problems in King County; and (3) Contribute to improvement in public health and the environment—including but not limited to the habitat, food, and sensitive life stages of threatened species. IPM specifies that the use of pesticides/herbicides should always be the last resort after Best Management Practices (BMPs) have been followed.</td>
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<tr>
<td><strong>EN-27 (proposed numbering)</strong></td>
<td>New Policy</td>
<td>Restore ecological function and value to the region's freshwater and marine shorelines, watersheds, drained or degraded wetlands, ponds, and re-routed streams, and estuaries to a natural condition for ecological function, including stormwater management, and value, where appropriate and feasible.</td>
<td><strong>MPP-EN-20</strong> Restore – where appropriate and possible – the region's freshwater and marine shorelines, watersheds, and estuaries to a natural condition for ecological function and value.</td>
</tr>
<tr>
<td><strong>EN-28 (proposed numbering)</strong></td>
<td>New Policy</td>
<td>Prevent, mitigate, and remediate harmful environmental pollutants and hazards, including noise, light, air, soil, and structural hazards, where they have contributed to racially disparate environmental and health impacts, and to increase environmental resiliency in low-income communities. Mitigation could include adding green spaces between pollution sources, such as industries and major roads, and residential housing.</td>
<td>Note: Addressing pollution and especially environmental and social justice issues for frequently affected community members and addressing hazard mitigation and resiliency comments from GMPC. This policy should include noise-source reduction be it roads, industry, commercial business (i.e., construction and mining sites, bars, entertainment venues, anything with outside public address systems, etc.), and transportation vehicles. Rationale includes the significant impacts on physical and mental health that noise presents, especially as an issue of equity.</td>
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New Policy

Adopt policies, regulations, and processes, related to new or existing fossil fuel facilities, that are designed to:

- Protect public health, safety, and welfare from all impacts of fossil fuels facilities;
- Mitigate and prepare for any impacts of fossil fuel facility disasters on all communities;
- Protect and preserve natural ecosystems from the construction and operational impacts of fossil fuel facilities;
- Manage impacts on public services and infrastructure in emergency management, resilience planning, and capital spending;
- Ensure comprehensive environmental review, and extensive community engagement, during initial siting, modifications, and on a periodic basis; and
- Reduce climate change impacts from fossil fuel facility construction and operations.

Note: Addresses Fossil Fuels, Fossil Fuel Facilities and Fossil Fuel Facilities Review Process and their role in transforming to clean energy. Add these terms to the glossary.
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<td>EN-30</td>
<td>New Policy</td>
<td>Adopt and implement policies and programs that substantially reduce greenhouse gas emissions to meet state, regional, and local emissions reduction goals, including targets adopted by the Puget Sound Clean Air Agency.</td>
<td><strong>MPP-CC-1</strong> Advance the adoption and implementation of actions that substantially reduce greenhouse gas emissions in support of state, regional, and local emissions reduction goals, including targets adopted by the Puget Sound Clean Air Agency. Address the central Puget Sound region’s contribution to climate change by, at a minimum, committing to comply with state initiatives and directives regarding climate change and the reduction of greenhouse gases. Jurisdictions and agencies should work to include an analysis of climate change impacts when conducting an environmental review process under the State Environmental Policy Act.</td>
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<tr>
<td>MPP-CC-11</td>
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<td><strong>MPP-CC-11</strong> Support achievement of regional greenhouse gas emissions reduction goals through countywide planning policies and local comprehensive plans.</td>
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<td>CC-Action-3: Policies and Actions to Address Climate Change: Cities and counties will incorporate emissions reduction policies and actions that contribute meaningfully toward regional greenhouse gas emission goals, along with equitable climate resiliency measures, in their comprehensive planning. Strategies include land uses that reduce vehicle miles traveled and promote transit, biking, and walking consistent with the Regional Growth Strategy, developing and implementing climate friendly building codes, investments in multimodal transportation choices, and steps to encourage a transition to cleaner transportation and energy systems.</td>
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<tr>
<td>EN-31</td>
<td>EN-16</td>
<td>Plan for land use patterns and transportation systems that minimize air pollution and greenhouse gas emissions, including: • Maintaining or exceeding existing standards for carbon monoxide, ozone, and particulates; • Directing growth to Urban Centers and other mixed use/ high density locations that support mass transit, encourage non-motorized modes of travel and reduce trip lengths; • Facilitating modes of travel other than single occupancy vehicles including transit, walking, bicycling, and carpooling; • Incorporating energy-saving strategies in infrastructure planning and design; • Encouraging inter-jurisdictional planning to ensure efficient use of transportation infrastructure and modes of travel; • Encouraging new development to use low emission construction practices, low or zero net lifetime energy requirements and “green” building techniques; and • Reducing building energy use through green building and retrofit of existing buildings; and • Increasing the use of low emission vehicles, such as efficient electric-powered vehicles.</td>
<td>MPP-CC-2 Reduce the rate of building energy use per capita, both in building use and in transportation activities through green building and retrofit of existing buildings. Note: Revised to include retrofitting of buildings.</td>
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<tr>
<td>EN-32</td>
<td>EN-17</td>
<td>Establish a countywide greenhouse gas emissions reduction target that meets or exceeds the statewide reduction requirement that is stated as the 2050 goal of a 50 percent reduction below 1990 levels goals and targets with the latest international climate science and statewide targets aiming to limit the most severe impacts of climate change and keep global warming under 1.5 degrees Celsius.</td>
<td>Note: State has targets using 1990 as a base year and most other cities in King County use either 2005 or 2007 as a base year. However, this revision reflects alignment with State and international climate science while acknowledging the goal of keeping global warming under 1.5 degrees Celsius.</td>
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<td>EN-33</td>
<td>EN-18</td>
<td>Reduce countywide sources of greenhouse gas emissions compared to a 2007 baseline, by 25% by 2020, 50% by 2030, and 80% by 2050; 50% by 2030, 75% by 2040; and 95% and net zero emissions by 2050. Assuming 1% annual population growth, these targets translate to per capita emissions of approximately 8.5 metric tons of carbon dioxide equivalent (MTCO2e) by 2020, 5.5 MTCO2e, and 1.5 MTCO2e by 2050.</td>
<td>Note: Acknowledges the State emission reduction target for and is consistent with the 2020 SCAP revisions. Broad K4C city elected official support for strengthening these targets.</td>
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<tr>
<td>EN-34 (proposed numbering)</td>
<td>EN-18A</td>
<td>King County shall assess and report countywide greenhouse gas emissions associated with resident, business, and other local government buildings, on-road vehicles, and solid waste at least every two years. King County shall also update its comprehensive greenhouse gas emissions inventory that quantifies all direct local sources of greenhouse gas emissions as well as emissions associated with local consumption at least every five years. Encourage cities in King County to develop city specific emissions inventories and data, in partnership with King County.</td>
<td>Note: Added specific language that points KC cities to KC for help and partnership in creating an emission inventory. This work will be done through the K4C.</td>
</tr>
<tr>
<td>EN-35 (proposed numbering)</td>
<td>EN-19</td>
<td>Promote energy efficiency, conservation methods, and sustainable energy sources, electrification of the transportation system, reduction of single-occupancy trips and vehicle miles traveled, and encourage telecommuting, to reduce air pollution, greenhouse gases, and consumption of fossil fuels to support state, regional, and local climate change reduction goals.</td>
<td>MPP-CC-3 Reduce greenhouse gases by expanding the use of conservation and alternative energy sources, electrifying the transportation system, and by reducing vehicle miles traveled by increasing alternatives to driving alone. MPP-EN-21 Continue efforts to reduce pollutants from transportation activities, including through the use of cleaner fuels and vehicles and increasing alternatives to driving alone, as well as design and land use. MPP-CC-12 Prioritize transportation investments that support achievement of regional greenhouse gas emissions reduction goals, such as by reducing vehicle miles traveled.</td>
</tr>
<tr>
<td>EN-37 (proposed numbering)</td>
<td>New Policy</td>
<td>Address rising sea water by siting and planning for relocation of hazardous industries and essential public services away from the 500-year floodplain.</td>
<td>MPP-CC-10 Address rising sea water by siting and planning for relocation of hazardous industries and essential public services away from the 500-year floodplain.</td>
</tr>
<tr>
<td>EN-38 (proposed numbering)</td>
<td>New Policy</td>
<td>Protect and restore natural resources such as forests, farmland, wetlands, estuaries, and urban tree canopy, that sequester and store carbon.</td>
<td>MPP-CC-4 Protect and restore natural resources that sequester and store carbon such as forests, farmland, wetlands, estuaries, and urban tree canopy. Take positive actions to reduce carbon, such as increasing the number of trees in urban portions of the region.</td>
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### Definitions for Glossary –

**Clean renewable energy**: Includes the production of electricity from wind, solar and geothermal and does not include production of energy created by combustion of fuel that causes greenhouse gas emissions or produces hazardous waste.

**King County’s definition of renewable energy from 2020 Strategic Climate Action Plan:**

*Renewable energy* is energy created from sources that can be replenished in a short period of time. The five renewable sources used most often are biomass (such as wood and biogas), the movement of water, geothermal (heat from within the earth), wind, and solar.

### Development Patterns

**GENERAL COMMENTS**—

We would like to see separate “Urban Communities and Centers” and “Rural Areas and Natural Resource Lands” chapters, much like as is done in the King County Comprehensive Plan (Chapters 2 and 3, respectively). This would recognize the importance of preserving/protecting the Rural Area. Also, consider adding two policies: (1) Tighten thresholds for categorical exemptions under SEPA. While thresholds may be raised in urban areas, consider tightening them in the Rural Area & (2) Fund/conduct permit code enforcement to ensure all required permit conditions are met.
### Urban Growth Area

#### Urban Lands

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| DP-2       | DP-2       | Accommodate housing and employment growth first and foremost in cities and centers within the Urban Growth Area, where residents and workers have higher access to opportunity and high-capacity transit. Promote a pattern of compact development within the Urban Growth Area that includes housing at a range of urban densities, commercial and industrial development, and other urban facilities, including medical, governmental, institutional, and educational uses and schools, and parks and open space. The Urban Growth Area will include a mix of uses that are convenient to and support public transportation in order to reduce reliance on single occupancy vehicle travel for most daily activities. | **MPP-DP-1** Develop high quality, compact urban communities throughout the region’s urban growth area that impart a sense of place, preserve local character, provide for mixed uses and choices in housing types, and encourage walking, bicycling, and transit use.  
**MPP-DP-11** Identify and create opportunities to develop parks, civic places (including schools) and public spaces, especially in or adjacent to centers.  
**MPP-RGS-4** Accommodate the region’s growth first and foremost in the urban growth area. Ensure that development in rural areas is consistent with the regional vision and the goals of the Regional Open Space Conservation Plan.  
Note: Edits for consistency on role of UGA. Includes schools, consistent with other policies on school siting. |
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| DP-3       | DP-3       | Efficiently develop and use residential, commercial, and manufacturing land efficiently in the Urban Growth Area to create healthy and vibrant urban communities with a full range of urban services, and to protect the long-term viability of the Rural Area and Resource Lands. Promote the efficient use of land within the Urban Growth Area by using methods such as:  
  a) Directing concentrations of housing and employment growth to high opportunity areas like designated centers and station areas, consistent with the numeric goals in the regional growth strategy;  
  b) Encouraging compact development with a mix of compatible residential, commercial, and community activities;  
  c) Maximizing the use of existing capacity for housing and employment;  
  d) Redeveloping underutilized lands, in a manner that considers equity and mitigates displacement; and  
  e) Coordinating plans for land use, transportation, schools, capital facilities and services. | MPP-DP-4 Support the transformation of key underutilized lands, such as surplus public lands or environmentally contaminated lands as brownfields and greyfields, to higher-density, mixed-use areas to complement the development of centers and the enhancement of existing neighborhoods.  
MPP-DP-11 Identify and create opportunities to develop parks, civic places (including schools) and public spaces, especially in or adjacent to centers.  
MPP-DP-Action-7 Identification and Clean-up of Underused Lands: Local governments, in cooperation with state and/or federal regulatory agencies, will develop strategies for cleaning up brownfield and contaminated sites. Local jurisdictions should identify underused lands (such as environmentally contaminated land and surplus public lands) for future redevelopment or reuse.  
MPP-RGS-6 Encourage efficient use of urban land by maximizing the development potential of existing urban lands and increasing density in the urban growth area in locations consistent with the Regional Growth Strategy such as advancing development that achieves zoned density.  
Note: Sub-bulleting consistency. Expands centers framework consistent with later policies. Addresses role of underutilized lands. |
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<th>Reason for Change/MPP/ Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>DP-4</td>
<td>DP-4</td>
<td><strong>Concentrate housing and employment growth within the designated Urban Growth Area.</strong> Focus housing growth in the Urban Growth Area within cities, countywide designated Urban Centers, designated regional centers, countywide centers, and locally designated local centers, to promote access to opportunity. Focus employment growth within regional and countywide designated Urban and Manufacturing/Industrial Centers and within locally designated local centers.</td>
<td><strong>MPP-RGS-9</strong> Focus a significant share of population and employment growth in designated regional growth centers.  <strong>MPP-RGS-10</strong> Focus a significant share of employment growth in designated regional manufacturing/industrial centers.  Note: Refined to focus on centers, and consolidates UGA concepts into earlier policy.</td>
</tr>
<tr>
<td>DP-5</td>
<td>DP-5</td>
<td><strong>Decrease/Reduce</strong> greenhouse gas emissions through land use strategies that promote a mix of housing, employment, and services at densities sufficient to promote walking, bicycling, transit, and other alternatives to auto travel.</td>
<td></td>
</tr>
<tr>
<td>DP-6</td>
<td>DP-6</td>
<td><strong>Plan for development patterns</strong> Adopt land use and community investment strategies that promote public health and address racially and ethnically disparate health outcomes and promote access to opportunity, by providing opportunities for employment, safe and convenient daily physical activity, social connectivity, and protection from exposure to harmful substances and environments, and housing in high opportunity areas.</td>
<td><strong>MPP-DP-3</strong> Preserve and Enhance existing neighborhoods and create vibrant, sustainable compact urban communities that provide diverse choices in housing types, a high degree of connectivity in the street network to accommodate walking, bicycling, and transit use, and sufficient public spaces.  <strong>MPP-DP-15</strong> Design communities to provide an improved safe and welcoming environments for walking and bicycling.  <strong>MPP-DP-18</strong> Address existing health disparities and improve health outcomes in all communities.  Note: Direction to examine past housing practices for disparities. Adds missing concepts related to health and health disparities and equity.</td>
</tr>
<tr>
<td>DP-7</td>
<td>DP-7</td>
<td><strong>Plan for development patterns</strong> street networks that provide a high degree of connectivity in order to encourage walking, bicycling, and transit use, and that promote safe and healthy routes to and from public schools.</td>
<td><strong>MPP-DP-3</strong> Preserve and Enhance existing neighborhoods and create vibrant, sustainable compact urban communities that provide diverse choices in housing types, a high degree of connectivity in the street network to accommodate walking, bicycling, and transit use, and sufficient public spaces.  Note: Revised focus on transportation and connectivity.</td>
</tr>
<tr>
<td>2021 CPP #</td>
<td>2012 CPP #</td>
<td>Policy/Action</td>
<td>Reason for Change/MPP/ Notes</td>
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| DP-8      | DP-8       | Increase access to healthy food in communities throughout the Urban Growth Area by encouraging the location of healthy food purveyors, such as grocery stores, farmers markets, and community food gardens in proximity to residential uses and transit facilities, especially in those areas with limited access to healthy food. | **MPP-DP-20** Support agricultural, farmland, and aquatic uses that enhance the food system in the central Puget Sound region and its capacity to produce fresh and minimally processed foods. 
*Note: Addresses social equity.* |
<p>| DP-9      | DP-9       | Designate Urban Separators as permanent low-density incorporated and unincorporated areas within the Urban Growth Area. Urban Separators are intended to protect Resource Lands, the Rural Area, and environmentally sensitive areas, and create open space and wildlife corridors within and between communities while also providing public health, environmental, visual, and recreational benefits. Changes to Urban Separators are made pursuant to the Countywide Planning Policies amendment process described in policy G-1. Designated Urban Separators within cities and unincorporated areas are shown in the Urban Separators Map in Appendix 3. | |
| DP-21     | DP-10      | Discourage incompatible land uses from locating adjacent to general aviation airports throughout the county. | <em>Note: Consolidated in new DP-21.</em> |</p>
<table>
<thead>
<tr>
<th>2021 CPP #</th>
<th>2012 CPP #</th>
<th>Policy/Action</th>
<th>Reason for Change/MPP/ Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>DP-X1</td>
<td>New Policy</td>
<td>No new Fully Contained Communities shall be approved in unincorporated King County.</td>
<td><strong>MPP-DP-34</strong> Avoid new fully contained communities outside of the designated urban growth area because of their potential to create sprawl and undermine state and regional growth management goals.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td><strong>MPP-DP-35</strong> In the event that a proposal is made for creating a new fully contained community, the county shall make the proposal available to other counties and to the Regional Council for advance review and comment on regional impacts.</td>
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<tr>
<td></td>
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<td></td>
<td>Note: Consistent with KC Comp Plan policy <strong>U-181</strong> Except for existing Fully Contained Community designations, no new Fully Contained Communities shall be approved in King County.</td>
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<td></td>
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<td></td>
<td>Although MPP-DP-34’s “avoid(ing) new fully contained communities outside of the designated urban growth area” is prudent and the basis for the new policy, it must be recognized that cities on the urban fringe, which approve such massive master-planned developments (e.g., Black Diamond and Covington), cause very similar problems, especially on poorly maintained and continually underfunded County road networks.</td>
</tr>
</tbody>
</table>

**Growth Targets**
GMPC shall allocate residential and employment growth to each city and urban unincorporated urban area in the county. This allocation is predicated on:

- **a)** Accommodating the most recent 20-year population projection from the state Office of Financial Management and the most recent 20-year regional employment forecast from the Puget Sound Regional Council;
- **b)** Planning for a pattern of growth that is consistent with the Regional Growth Strategy including focused growth within cities and Potential Annexation Areas with countywide designated centers and within other larger cities high capacity transit communities, limited development in the Rural Area, and protection of designated Resource Lands;
- **c)** Efficiently using existing zoned and future planned development capacity as well as the capacity of existing and planned infrastructure, including road, sewer and water, and stormwater systems;
- **d)** Promoting a land use pattern that can be served by a connected network of public transportation services and facilities and pedestrian and bicycle infrastructure and amenities;
- **e)** Improving the jobs/housing balance connection consistent with the Regional Growth Strategy, both within between counties in the region and within subareas in the county;
- **f)** Promoting sufficient opportunities for housing and employment development that is distributed throughout the Urban Growth Area.

### Notes

**NOTE:** This is a very important planning concept, but one where the follow-through has proven to be difficult. Cities must plan for both housing and commercial growth, but often attract the former, while the latter lags behind or, worse, never materializes at a level that provides the city an adequate tax base to provide needed services and infrastructure for both residents and businesses. This especially is prevalent for cities along the edge of the urban growth boundary (i.e., the “urban fringe”), which quite often businesses have tended to avoid (due to lower population densities, longer supply lines, etc.) or attract primarily retail businesses that often provide only low-paying jobs, which further adversely impact the tax base. As a result, such cities exhibit a great imbalance, i.e., being housing rich and employment poor. This then results in even more commuters traveling even longer distances. Consequently, we agree policies need to encourage housing in job-rich locations and not hope for jobs to materialize in housing-rich locations, which often appears to be what some cities continue to do.

**MPP-DP-12** Design transportation projects and other infrastructure to achieve community development objectives and improve communities.

**MPP-RGS-Goal** The region accommodates growth in urban areas, focused in designated centers and near transit stations, to create healthy, equitable, vibrant communities well-served by infrastructure and services. Rural and resource lands continue to be vital parts of the region that retain important cultural, economic, and rural lifestyle opportunities over the long term.

**MPP-RGS-8** Attract 65% of the region’s residential growth and 75% of the region’s employment growth to the regional growth centers and high-capacity transit station areas to realize the multiple public benefits of compact growth around high-capacity transit investments. As jurisdictions plan for growth targets, focus development near high-capacity transit to achieve the regional goal.

**MPP-RGS-Action-7** Regional Growth Strategy As counties and cities update their comprehensive plans in 2023/24 to accommodate growth targets and implement the Regional Growth Strategy, support a full range of strategies, including zoning and development standards, incentives, infrastructure investments, housing tools, and economic development, to achieve a development pattern that aligns with VISION 2050 and to reduce rural growth rates over time and focus growth in cities.

**MPP-RGS-Action-8** Plan for Jobs-Housing Balance: Countywide planning organizations will consider data on jobs-housing balance, especially recent and projected employment growth within Metropolitan and Core cities, to set housing growth targets that substantially improve jobs-housing balance consistent with the Regional Growth Strategy. Metropolitan and Core cities experiencing high job growth will take measures to provide additional housing capacity for a range...
<table>
<thead>
<tr>
<th>2021 CPP #</th>
<th>2012 CPP #</th>
<th>Policy/Action</th>
<th>Reason for Change/MPP/ Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>DP-12</td>
<td>DP-12</td>
<td>GMPC shall:</td>
<td>MPP-RGS-3 Provide flexibility in establishing and modifying growth targets within countywide planning policies, provided growth targets support the Regional Growth Strategy.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• a) Update housing and employment targets periodically to provide jurisdictions with up-to-date growth allocations to be <strong>incorporated used as the land use assumption</strong> in state-mandated comprehensive plan updates;</td>
<td>MPP-RGS-Action-9 Growth Targets Countywide planning organizations will work to develop processes to reconcile any discrepancies between city and county adopted targets contained in local comprehensive plans.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• b) Adopt housing and employment growth targets in the Countywide Planning Policies pursuant to the procedure described in policy G-1;</td>
<td>Note: Sub-bulleting consistency. Provision reflecting collaborative nature of the process. Addresses need to reconcile land use assumptions when establishing growth targets.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• c) Create a coordinated countywide process to reconcile and set growth targets that implements the Regional Growth Strategy through countywide shares of regional housing and jobs, allocations to Regional Geographies, and individual jurisdictional growth targets;</td>
<td>Cities on the urban fringe often do not have adequate transportation infrastructure often unduly relying on wholly inadequate King County roads in the Rural Area to accommodate the pass-through commuting traffic they generate.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• d) Adjust targets administratively upon annexation of unincorporated Potential Annexation Areas by cities. Growth targets for the 2006-2031 planning period are shown in table DP-1.</td>
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<tr>
<td></td>
<td></td>
<td>• e) Ensure sufficient infrastructure either exists or can be provided to service the growth when setting growth targets.</td>
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<tr>
<td>2021 CPP #</td>
<td>2012 CPP #</td>
<td>Policy/Action</td>
<td>Reason for Change/MPP/ Notes</td>
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</tbody>
</table>
| DP-13      | DP-13      | All jurisdictions shall plan to accommodate housing and employment targets in all jurisdictions. This includes: | **MPP-RGS-2** Use consistent countywide targeting processes for allocating population and employment growth consistent with the regional vision, including establishing: (a) local employment targets, (b) local housing targets based on population projections, and (c) local housing and employment growth targets for each designated regional growth center and manufacturing/industrial center.  

**MPP-RGS-12** Avoid increasing development capacity inconsistent with the Regional Growth Strategy in regional geographies not served by high-capacity transit. We expect local political pressures could be intense here and should not overcome regional economic sense. Also, cities on the urban fringe often do not have adequate bus service, let alone “high-capacity transit,” and most likely never will.  

**MPP-RGS-Action-7 Regional Growth Strategy:** As counties and cities update their comprehensive plans in 2023/24 to accommodate growth targets and implement the Regional Growth Strategy, support a full range of strategies, including zoning and development standards, incentives, infrastructure investments, housing tools, and economic development, to achieve a development pattern that aligns with VISION 2050 and to reduce rural growth rates over time and focus growth in cities.  

**MPP-RGS-Action-8 Plan for Jobs-Housing Balance:** Countywide planning organizations will consider data on jobs-housing balance, especially recent and projected employment growth within Metropolitan and Core cities, to set housing growth targets that substantially improve jobs-housing balance consistent with the Regional Growth Strategy. Metropolitan and Core cities experiencing high job growth will take measures to provide additional housing capacity for a range of housing types and affordability levels to meet the needs of those workers as well as the needs of existing residents who may be at risk of displacement. |
|            |            | • a) Using the adopted targets as the land use assumption for their comprehensive plan;  
|            |            | • b) Establishing local growth targets for regional growth centers and regional manufacturing-industrial centers, where applicable;  
|            |            | • c) Adopting comprehensive plans and zoning regulations that provide capacity for residential, commercial, and industrial uses that is sufficient to meet 20-year growth needs targets and is consistent with the desired growth pattern described in VISION 2040 2050;  
|            |            | • d) Coordinating local water, sewer, transportation and other infrastructure plans and investments among agencies, including special purpose district plans, are consistent with adopted targets as well as regional and countywide plans; and  
|            |            | • e) Transferring and accommodating unincorporated area housing and employment targets as annexations occur.  
|            |            | • f) Identifying infrastructure capacity needs both within and beyond the jurisdiction to accommodate local growth targets at the 6-, 10-, and 20-year horizons. |
We are glad to see that nearly every city of some size has Growth Targets where the number of jobs exceeds (or is close to) the number of housing units. But the glaring exception is Black Diamond, where the 25-yr Growth Target number of jobs (680) is but a fraction of the 25-yr Growth Target number of housing units (2,900), thus condemning most residents to long commutes that will tie up much of SE King County’s limited major and minor arterials. Further, the 2,900 target, itself, is far too high as the infrastructure, especially transportation, cannot and will not come close to accommodating such a number. To make matters worse, Black Diamond clearly intends to vastly exceed even this grossly large 25-yr Growth Target for housing units by more than double—it is slated to permit over 6,000 homes in its two Master-Planned Developments alone, as well 1,000s more already in the pipeline! Such blatant disregard for all other municipalities and the Rural Area makes a mockery of this planning exercise.

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>2019-2044 Housing Target</th>
<th>2019-2044 Jobs Target</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Metro Cities</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bellevue</td>
<td>27,000</td>
<td>54,000</td>
</tr>
<tr>
<td>Seattle</td>
<td>112,000</td>
<td>169,500</td>
</tr>
<tr>
<td><strong>Metropolitan Cities Subtotal</strong></td>
<td><strong>139,000</strong></td>
<td><strong>223,500</strong></td>
</tr>
<tr>
<td><strong>Core Cities</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Auburn</td>
<td>12,000</td>
<td>18,420</td>
</tr>
<tr>
<td>Bothell</td>
<td>5,800</td>
<td>9,000</td>
</tr>
<tr>
<td>Burien</td>
<td>7,500</td>
<td>4,500</td>
</tr>
<tr>
<td>Federal Way</td>
<td>11,260</td>
<td>20,460</td>
</tr>
<tr>
<td>Issaquah</td>
<td>3,500</td>
<td>7,500</td>
</tr>
<tr>
<td>Kent</td>
<td>10,200</td>
<td>30,200</td>
</tr>
<tr>
<td>Kirkland</td>
<td>13,200</td>
<td>25,000</td>
</tr>
<tr>
<td>Redmond</td>
<td>20,000</td>
<td>20,000</td>
</tr>
<tr>
<td>Renton</td>
<td>17,000</td>
<td>30,000</td>
</tr>
<tr>
<td>SeaTac</td>
<td>5,900</td>
<td>14,810</td>
</tr>
<tr>
<td>Tukwila</td>
<td>6,500</td>
<td>15,000</td>
</tr>
<tr>
<td><strong>Core Cities Subtotal</strong></td>
<td><strong>112,860</strong></td>
<td><strong>194,890</strong></td>
</tr>
<tr>
<td><strong>High Capacity Transit Communities</strong></td>
<td><strong>29,932</strong></td>
<td><strong>25,240</strong></td>
</tr>
<tr>
<td>Des Moines</td>
<td>3,800</td>
<td>2,380</td>
</tr>
<tr>
<td>Federal Way PAA</td>
<td>1,020</td>
<td>720</td>
</tr>
<tr>
<td>Kenmore</td>
<td>3,070</td>
<td>3,200</td>
</tr>
<tr>
<td>Lake Forest Park</td>
<td>870</td>
<td>550</td>
</tr>
<tr>
<td>Mercer Island</td>
<td>1,239</td>
<td>1,300</td>
</tr>
<tr>
<td>Newcastle</td>
<td>1,480</td>
<td>500</td>
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<td>North Highline</td>
<td>1,420</td>
<td>1,220</td>
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<tr>
<td>Renton PAA</td>
<td>1,670</td>
<td>370</td>
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<td>Shoreline</td>
<td>13,330</td>
<td>10,000</td>
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<tr>
<td>Woodinville</td>
<td>2,033</td>
<td>5,000</td>
</tr>
<tr>
<td><strong>High Capacity Transit Communities Subtotal</strong></td>
<td><strong>29,932</strong></td>
<td><strong>25,240</strong></td>
</tr>
</tbody>
</table>
### Amendments to the Urban Growth Area

<table>
<thead>
<tr>
<th>Policy</th>
<th>Description</th>
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<tbody>
<tr>
<td>DP-14</td>
<td>Review the Urban Growth Area at least every ten years. In this review consider monitoring reports and other available data. As a result of this review, and based on the criteria established in policies DP-15 and DP-16 through DP-18, King County may propose and then the Growth Management Planning Council may recommend amendments to the Countywide Planning Policies and King County Comprehensive Plan that make changes to the Urban Growth Area boundary.</td>
</tr>
</tbody>
</table>
| DP-15  | Allow amendment of the Urban Growth Area only when the following steps have been satisfied:  
  a) The proposed expansion amendment is under review by the County as part of an amendment process of the King County Comprehensive Plan;  
  b) King County submits the proposal to the Growth Management Planning Council for the purposes of review and recommendation to the King County Council on the proposed amendment to the Urban Growth Area;  
  c) The King County Council approves or denies the proposed amendment; and  
  d) If approved by the King County Council, the proposed amendment is ratified by the cities following the procedures set forth in policy G-1. |

Note: Technical clarification.

Note: Expands role of GMPC, consistent with current practice.
Allow expansion of the Urban Growth Area only if at least one of the following criteria is met:

a) A countywide analysis determines that the current Urban Growth Area is insufficient in size and additional land is needed to accommodate the housing and employment growth targets, including institutional and other non-residential uses, and there are no other reasonable measures, such as increasing density or rezoning existing urban land, that would avoid the need to expand the Urban Growth Area; or

b) A proposed expansion of the contiguous Urban Growth Area is accompanied by dedication of permanent open space to the King County Open Space System, where the acreage of the proposed open space:
   1) is at least a minimum of four times the acreage of the land added to the Urban Growth Area; and
   2) is contiguous with the original 1994 Urban Growth Area with at least a portion of the dedicated open space surrounding the proposed Urban Growth Area expansion; and
   3) preserves onsite and preserves high quality habitat, critical areas, or unique features that contribute to the band of permanent open space along the edge of the Urban Growth Area; or

c) The area is currently a King County park being transferred to a city to be maintained as a park in perpetuity or is park land that has been owned by a city since 1994 and is less than thirty acres in size.

Note: Refocuses program to avoid growth in outlying areas. Technical clarifications for consistency with County program.
Add land to the Urban Growth Area only if an expansion of the Urban Growth Area is warranted based on the criteria in DP-16(a) or DP-16(b), and it meets all of the following criteria:

a) Is adjacent to the existing Urban Growth Area;

b) For expansions based on DP-16(a) only, is no larger than necessary to promote compact development that accommodates anticipated growth needs and is adjacent to the existing Urban Growth Area boundary;

c) For expansions based on DP-16(b):
   i) Is adjacent to the original 1994 contiguous Urban Growth Area boundary;
   ii) Can be efficiently provided with urban services and does not require any supportive facilities, services, roads, or any infrastructure to cross or be located in the Rural Area or new open space area, and does not overly burden King County road networks in the Rural Area;
   iii) Follows topographical features that form natural boundaries, such as rivers and ridge lines and does not extend beyond natural boundaries, such as watersheds, that impede the provision of urban services;
   iv) Is not currently designated as Resource Land;
   v) Is sufficiently free of environmental constraints to be able to support urban development without significant adverse environmental impacts, unless the area is designated as an Urban Separator by interlocal agreement between King County and the annexing city; and
   vi) Only residential development is allowed on the new urban land; and

g) For expansions that are adjacent to a municipal boundary, approval shall be subject to an agreement between King County and the city or town adjacent to the area that the area will be added to the city’s Potential Annexation Area. No development on the property shall occur until the property is annexed by the city. These Urban Growth Area expansions require an agreement between the property owner, the annexing city, and the County.

Note: Same as DP-16. Policy changes are consistent with 2020 Executive Proposed King County Comprehensive Plan that was considered and deferred by the County Council and GMPC in 2020.

The “g)” should deleted now that Roman Numerals, such as “vii,” are being used.
| DP-18 | DP-18 | Allow redesignation of Urban land currently within the Urban Growth Area to Rural land outside of the Urban Growth Area if the land is not needed to accommodate projected urban growth, is not served by public sewers, is contiguous with the Rural Area, and:  
  a) Is not characterized by urban development;  
  b) Is currently developed with a low density lot pattern that cannot be realistically redeveloped at an urban density; or  
  c) Is characterized by environmentally sensitive areas making it inappropriate for higher density development. |

| Review and Evaluation Program |
| DP-19 | DP-19 | Conduct a buildable lands program that meets or exceeds the review and evaluation requirements of the Growth Management Act. The purposes of the buildable lands program are:  
  • a) To collect and analyze data on development activity, land supply, and capacity for residential, commercial, and industrial land uses in urban areas;  
  • To evaluate the consistency of actual development densities with current comprehensive plans; and  
  • b) To determine whether jurisdictions are achieving urban densities by comparing growth and development assumptions and targets in the countywide planning policies and comprehensive plans with actual growth and development that has occurred; and  
  • c) To evaluate the sufficiency of land capacity to accommodate growth for the remainder of the planning period. |

Note: Sub-bulleting consistency. Additional provisions in response to changes in state law (not a part of VISION).

Re: b) — What about cities that grossly exceed their growth targets and do not possess sufficient infrastructure (nor have any realistic plans and funding mechanisms to support same)? This is one of the reasons why PSRC conditional certified Black Diamond’s 2015 Comprehensive Plan Update (“2015” is NOT a typo and the Update still is not complete !!!). In fact, one of the PSRC conditions specifically addresses vastly exceeding Growth Targets and another the lack of any Contingency Plans for transportation infrastructure should all the hoped-for grants listed not materialize.

Shouldn't the bullets be deleted now that letters are being added?
| DP-20 | DP-20 | If necessary based on the findings of a periodic buildable lands evaluation report, adopt reasonable measures, other than expansion of the Urban Growth Area, to increase land capacity for housing and employment growth within the Urban Growth Area by making more efficient use of urban land consistent with current plans and targets. The County and its cities, through the Growth Management Planning Council, will collaboratively determine whether reasonable measures other than amending the Urban Growth Area are necessary to ensure sufficient additional capacity if a countywide urban growth capacity report determines that:

a) the current Urban Growth Area is insufficient in capacity to accommodate the housing and employment growth targets; or

b) any jurisdiction contains insufficient capacity to accommodate the housing and employment growth targets, has not made sufficient progress toward achieving the housing and employment growth targets, or has not achieved urban densities consistent with the adopted comprehensive plan.

Reasonable measures should be adopted to help implement local targets in a manner consistent with the Regional Growth Strategy. |

Note: Codifies collaborative process, consistent with current practices.  
The language in this policy is of concern, as this could result in even more pressure to expand the UGA.  
The first letters of the a) and b) entries should be capitalized. |

| DP-X2 (temporary numbering) | New Policy | Adopt any necessary reasonable measures in comprehensive plans, and these may include increased land capacity for housing and employment or other measures to promote growth that is consistent with planned urban densities and adopted housing and employment targets. Jurisdictions will report adopted reasonable measures to the GMPC and will collaborate to provide data periodically on the effectiveness of those measures. |

Note: Codifies collaborative process, consistent with current practices.  
Throughout these CPP policies there appears to be great concern that cities will not achieve their Growth Targets, but no concern for those that grossly exceed their Growth Targets, thereby exerting undue pressure on King County infrastructure and the integrity of the Rural Area. What also is of concern was the “horse-trading” conducted by the cities the “shift” housing Growth Targets from cities that didn’t want more (e.g., Sammamish) to cities that did want more (e.g., Black Diamond and Covington), even though they have little infrastructure to accommodate them. In the end the result will be the entire County not achieving its total housing Growth Target. |
| DP-21 |  | Coordinate the preparation of comprehensive plans among with adjacent and other affected jurisdictions, military facilities, tribal governments, ports, airports, and other related entities as a means to avoid or mitigate the potential cross-border impacts of urban development and encroachment of incompatible uses.  |  | MPP-DP-7 Consider the potential impacts of development to culturally significant sites and tribal treaty fishing, hunting, and gathering grounds.  |  | MPP-DP-48 Protect the continued operation of general aviation airports from encroachment by incompatible uses and development on adjacent land.  |  | MPP-DP-49 Protect military lands from encroachment by incompatible uses and development on adjacent land.  |  | MPP-DP-50 Protect industrial lands zoning and manufacturing/industrial centers from encroachment by incompatible uses and development on adjacent land.  |  | MPP-DP-51 Protect tribal reservation lands from encroachment by incompatible land uses and development both within reservation boundaries and on adjacent land.  |  | Note: Consolidates collaboration with other entities into one joint planning policy.  |
| DP-22 | DP-22 | Designate Potential Annexation Areas in city comprehensive plans and adopt them in the Countywide Planning Policies. Ensure that Affiliate all Potential Annexation Areas with adjacent cities and ensure they do not overlap or leave urban unincorporated urban islands between cities. Except for parcel or block-level annexations that facilitate service provision, commercial areas, and low- and high-income residential areas should be annexed holistically rather than in a manner that leaves residential urban unincorporated urban areas stranded. Annexation is preferred over incorporation.  |  | MPP-DP-27 Affiliate all urban unincorporated lands appropriate for annexation with an adjacent city or identify those that may be feasible for incorporation. To fulfill the Regional Growth Strategy, while promoting economical administration and services, annexation is preferred over incorporation.  |  | MPP-RGS-16 Identify strategies, incentives, and approaches to facilitate the annexation or incorporation of unincorporated areas within urban growth areas into cities.  |  | Note: Consolidates annexation topics. New provision to support holistic approaches to annexation boundary decisions, rather than piecemeal annexations. |
| DP-23 | DP-23 | Facilitate the annexation of unincorporated areas within the Urban Growth Area that are already urbanized and are within a city’s Potential Annexation Area in order to provide increased provision of urban services to those areas. Annexation is preferred over incorporation. To move Potential Annexation Areas towards annexation, cities and the County shall work to establish pre-annexation agreements that identify mutual interests, and ensure coordinated planning and compatible development, until annexation is feasible. | **MPP-DP-29** Support annexation and incorporation in urban unincorporated areas by planning for phased growth of communities to be economically viable, supported by the urban infrastructure, and served by public transit.  

Note: New provision to require pre-annexation area agreements. This is based on King County Comprehensive Plan workplan action 17, which developed an annexation plan and presented to GMPC in 2019. |
| DP-24 | DP-26 | Develop agreements between King County and cities with Potential Annexation Areas to apply city-compatible development standards that will guide land development prior to annexation. Utilize tools and strategies such as service and infrastructure financing, transferring permitting authority, or identifying appropriate funding sources to address infrastructure and service provision issues. | **MPP-DP-28** Support joint planning between cities, counties, and service providers to work cooperatively in planning for urban unincorporated areas to ensure an orderly transition to city governance, including efforts such as: (a) establishing urban development standards, (b) addressing service and infrastructure financing, and (c) transferring permitting authority.  

**MPP-RGS-16** Identify strategies, incentives, and approaches to facilitate the annexation or incorporation of unincorporated areas within urban growth areas into cities.  

Note: Expands lists of potential strategies. |
| DP-25 | DP-24 | Allow cities to annex territory only within their designated Potential Annexation Area as shown in the Potential Annexation Areas Map in Appendix 2. Phase annexations to coincide with the ability of cities or existing special purpose districts to coordinate the provision of a full range of urban services to areas to be annexed.  
  a) For areas that have received approval for annexation from the King County Boundary Review Board, the City shall include a process that includes collaboration with King County for annexation in the next statutory update of their Comprehensive Plan.  
  b) Jurisdictions may negotiate with one another regarding changing boundaries or affiliations of Potential Annexation Areas and may propose such changes to GMPC as an amendment to Appendix 2. In proposing any new or revised PAA boundaries or city affiliation, jurisdictions should consider the criteria in DP-27. In order to ensure that any changes can be included in local comprehensive plans, any proposals resulting from such negotiation should be brought to GMPC for action no later than two years prior to the statutory deadline for the major plan update. | **MPP-DP-29** Support annexation and incorporation in urban unincorporated areas by planning for phased growth of communities to be economically viable, supported by the urban infrastructure, and served by public transit.  
  **MPP-DP-30** Support the provision and coordination of urban services to unincorporated urban areas by the adjacent city or, where appropriate, by the county or an existing utility district as an interim approach.  
  Note: Recognizes that special districts have an important role in some locations. New provision with processes for resolving boundary issues. New provision to allow boundaries to change following negotiation or GMPC involvement. |
| DP-26 | Within the North Highline unincorporated area, where Potential Annexation Areas overlapped prior to January 1, 2009, strive to establish alternative non-overlapping Potential Annexation Area boundaries within the North Highline unincorporated area, where Potential Annexation Areas overlapped prior to January 1, 2009, through a process of negotiation. Absent a negotiated resolution, a city may file a Notice of Intent to Annex with the Boundary Review Board for King County for territory within its designated portion of a Potential Annexation Area overlap as shown in the Potential Annexation Areas Map in Appendix 2 and detailed in the city’s comprehensive plan after the following steps have been taken:

| a) The city proposing annexation has, at least 30 days prior to filing a Notice of Intent to annex with the Boundary Review Board, contacted in writing the cities with the PAA overlap and the county to provide notification of the city’s intent to annex and to request a meeting or formal mediation to discuss boundary alternatives, and;  
| b) The cities with the Potential Annexation Area overlap and the county have either:

| 1) Agreed to meet but failed to develop a negotiated settlement to the overlap within 60 days of receipt of the notice, or  
| 2) Declined to meet or failed to respond in writing within 30 days of receipt of the notice.  
| DP-27 | Evaluate proposals to annex or incorporate urban unincorporated land based on the following criteria, as applicable:

| a) Conformance with Countywide Planning Policies including the Urban Growth Area boundary;  
| b) The ability of the annexing or incorporating jurisdiction to efficiently provide urban services at standards equal to or better than the current service providers; and  
| c) The effect of the annexation or incorporation in a manner that will avoid or creating unincorporated islands of development;  
| d) The ability to serve the area in a manner that addresses social equity and promotes access to opportunity; and  
| e) Based upon joint outreach to community, the ability and interest of a city in moving forward with a timely annexation of the area, consistent with these criteria.  

Note: New criteria addressing a range of topics, supporting annexation work plan findings.
| DP-28 | Resolve the issue of unincorporated road islands within or between cities. 
Roadways Annexation of roadways and shared streets within or between cities, but still under King County jurisdiction, should be annexed by considered by cities that are adjacent-cities to them. Cities and the county shall work to establish timeframes for annexation of road islands. |
<table>
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<td>Note: Encourages timelines to facilitate resolution.</td>
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**Centers**

**Urban Growth Centers**

<table>
<thead>
<tr>
<th>DP-29</th>
<th>Concentrate Focus housing and employment growth within into designated Urban Centers regional growth centers, at levels consistent with the Regional Growth Strategy, and at densities that maximize high-capacity transit.</th>
</tr>
</thead>
<tbody>
<tr>
<td>MPP-DP-22 Plan for densities that maximize benefits of transit investments in high-capacity transit station areas that are expected to attract significant new population or employment growth.</td>
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<tr>
<td>MPP-RGS-8 Attract 65% of the region’s residential growth and 75% of the region’s employment growth to the regional growth centers and high-capacity transit station areas to realize the multiple public benefits of compact growth around high-capacity transit investments. As jurisdictions plan for growth targets, focus development near high-capacity transit to achieve the regional goal.</td>
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<td>Note: Combined DP-29 and DP-33 into single policy.</td>
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<tr>
<th>DP-30</th>
<th>Designate Urban Centers regional growth centers in the Countywide Planning Policies where city-nominated locations meet the criteria in policies DP-31 and DP-32 and where the city’s commitments will help ensure the success of the center. Urban the King County Centers Designation Framework. Urban Centers Regional growth centers will be limited in number and located on existing or planned high capacity transit corridors to provide a framework for targeted private and public investments that support regional land use and transportation goals. The Land Use Map in Appendix 1 shows the locations of the designated Urban Centers.</th>
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<tr>
<td>Note: Technical clarifications.</td>
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</table>
| DP-31 Criteria moved to in Appendix 6: King County Centers Designation Framework | **The King County Centers Designation Framework, adopted in Appendix 6, establishes designation processes and timelines, minimum existing and planned density thresholds, and subarea planning expectations. King County designated centers are shown on the Urban Growth Area Boundary Map in Appendix 1.**

Allow designation of new Urban Centers where the proposed Center:

- a) Encompasses an area up to one and a half square miles; and
- b) Has adopted zoning regulations and infrastructure plans that are adequate to accommodate
  - i) A minimum of 15,000 jobs within one-half mile of an existing or planned high-capacity transit station;
  - ii) At a minimum, an average of 50 employees per gross acre within the Urban Center; and
  - iii) At a minimum, an average of 15 housing units per gross acre within the Urban Center.

| **MPP-DP-21** Provide a regional framework for designating and evaluating regional growth centers. |
| **MPP-DP-24** Provide a regional framework for designating and evaluating regional manufacturing/industrial centers. |
| **MPP-DP-Action-8 Center Plans and Station Area Plans:** Each city or county with a designated regional center and/or light rail transit station area will develop a subarea plan for the designated regional growth center, station area(s), and/or manufacturing/industrial center. Cities and counties will plan for other forms of high-capacity transit stations, such as bus rapid transit and commuter rail, and countywide and local centers, through local comprehensive plans, subarea plans, neighborhood plans, or other planning tools. Jurisdictions may consider grouping station areas that are located in close proximity.

*Note: Adds new Appendix 6, which is the Centers Designation Framework Matrix.* |
<table>
<thead>
<tr>
<th>DP-32 Criteria moved to Appendix 6: King County Centers Designation Framework</th>
<th>Establish subarea plans for designated regional and countywide centers that comport with the expectations in the King County Centers Designation Framework adopted in Appendix 6.</th>
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<tr>
<td>Adopt a map and housing and employment growth targets in city comprehensive plans for each Urban Center, and adopt policies to promote and maintain quality of life in the Center through:</td>
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<td>• A broad mix of land uses that foster both daytime and nighttime activities and opportunities for social interaction;</td>
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<td>• A range of affordable and healthy housing choices;</td>
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<td>• Historic preservation and adaptive reuse of historic places;</td>
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<td>• Parks and public open spaces that are accessible and beneficial to all residents in the Urban Center;</td>
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<td>• Strategies to increase tree canopy within the Urban Center and incorporate low-impact development measures to minimize stormwater runoff;</td>
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<td>• Facilities to meet human service needs;</td>
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<td>• Superior urban design which reflects the local community vision for compact urban development;</td>
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<tr>
<td>• Pedestrian and bicycle mobility, transit use, and linkages between these modes;</td>
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<tr>
<td>• Planning for complete streets to provide safe and inviting access to multiple travel modes, especially bicycle and pedestrian travel, and parking management and other strategies that minimize trips made by single-occupant vehicle, especially during peak commute periods.</td>
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Why was “MPP-DP-44: Work to conserve valuable rural and resource lands through techniques, such as conservation programs,… Focus growth within the urban growth area, (especially cities), to lessen pressures to convert rural and resource areas to residential uses….” removed? We have found this especially true with mining lands that, once exhausted of their mineral wealth, become prime targets for residential development with owners seeking zoning changes. Although “growth” is focused “within the urban growth area (UGA),” such pressures will continue, since the lands outside the UGA, generally, often are much less costly to acquire and develop.

**MPP-DP-Action-9: Mode Split Goals for Centers:** Each city with a designated regional growth center and/or manufacturing/industrial center will establish mode split goals for these centers and identify strategies to encourage transportation demand management and alternatives to driving alone.

Note: Links to expectations from PSRC that will need to be met to be designated regionally.

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<tr>
<th>DP-X3 (temporary numbering)</th>
<th>New Policy</th>
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<tr>
<td>Evaluate the potential physical, economic, and cultural displacement of residents and businesses in regional growth centers and high-capacity transit station areas, particularly for Black, Indigenous, immigrant, and other communities at greatest risk. Use a range of strategies to mitigate identified displacement impacts.</td>
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</table>

**MPP-DP-23** Evaluate planning in regional growth centers and high-capacity transit station areas for their potential physical, economic, and cultural displacement of marginalized residents and businesses. Use a range of strategies to mitigate displacement impacts.

Note: New policy addressing equity issues, consistent with MPP.

<table>
<thead>
<tr>
<th>N/A DP-33</th>
<th>Form the land use foundation for a regional high-capacity transit system through the designation of a system of Urban Centers. Urban Centers should receive high priority for the location of transit service.</th>
</tr>
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Note: Duplicative of other policies.
<table>
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<tr>
<th>DP-X4 (tempor ary numbering)</th>
<th>New Policy</th>
<th>Designate countywide centers in the Countywide Planning Policies where locations meet the criteria in the King County Centers Designation Framework. Countywide centers shall have zoned densities that support high-capacity transit and be located on existing or planned transit corridors.</th>
<th>MPP-DP-26 Establish a common framework to designate countywide centers among the countywide processes for designating subregional centers to ensure compatibility within the region. MPP-RGS-11 Encourage growth in designated countywide centers. Note: Establishes new countywide center process.</th>
</tr>
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<tr>
<td>DP-38</td>
<td>DP-38</td>
<td>Identify in comprehensive plans local centers, such as city or neighborhood centers, transit station areas, or other activity nodes, where housing, employment, and services are accommodated in a compact form and at sufficient densities to support transit service and to make efficient use of urban land.</td>
<td>MPP-DP-25 Support the development of centers within all jurisdictions, including high-capacity transit station areas and countywide and local centers, town centers and activity nodes. Note: Technical change.</td>
</tr>
<tr>
<td>N/A</td>
<td>DP-34</td>
<td>Concentrate manufacturing and industrial employment within countywide designated Manufacturing/Industrial Centers. The Land Use Map in Appendix 1 shows the locations of the designated Manufacturing/Industrial Centers.</td>
<td>Note: Replaced by edits in DP-37, referencing the new Framework.</td>
</tr>
</tbody>
</table>
| N/A Criteria moved to in Appendix 6: King County Centers Designation Framework | DP-35 | Adept in city comprehensive plans a map and employment growth targets for each Manufacturing/Industrial Center and adopt policies and regulations for the Center to:
• Provide zoning and infrastructure adequate to accommodate a minimum of 10,000 jobs;
• Preserve and enhance sites that are appropriate for manufacturing or other industrial uses;
• Strictly limit residential uses and discourage land uses that are not compatible with manufacturing and industrial uses, such as by imposing low maximum size limits on offices and retail uses that are not accessory to an industrial use;
• Facilitate the mobility of employees by transit and the movement of goods by truck, rail, air or waterway, as appropriate;
• Provide for capital facility improvement projects which support the movement of goods and manufacturing/industrial operations;
• Ensure that utilities are available to serve the center;
• Avoid conflicts with adjacent land uses to ensure the continued viability of the land in the Manufacturing/Industrial Center for manufacturing and industrial activities; and
Attract and retain the types of businesses that will ensure economic growth and stability. |
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<td>Note: Replaced by edits in DP-37, referencing the new Framework.</td>
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### Manufacturing/Industrial Centers

| DP-36 | Minimize or mitigate potential health impacts of the activities in Manufacturing/Industrial Centers manufacturing/industrial centers on residential communities, schools, open space, and other public facilities. |
| DP-37 | Designate additional Manufacturing/Industrial Centers and accommodate industrial employment growth in a network of regional and countywide industrial centers to support economic development and middle-wage jobs in King County. Designate these centers in the Countywide Planning Policies pursuant to the procedures described in policy G-1 based on nominations from cities and after determining that:
  
  a) the nominated locations meet the criteria set forth in policy DP-35 the King County Centers Designation Framework and the criteria established by the Puget Sound Regional Council for Regional Manufacturing/Industrial Centers regional manufacturing/industrial centers;
  b) the proposed center’s location will promote a countywide system of Manufacturing/Industrial Centers manufacturing/industrial centers with the total number of centers representing a realistic growth strategy for the county; and
  c) the city’s commitments will help ensure the success of the center. |
| MPP-RGS-10 | Focus a significant share of employment growth in designated regional manufacturing/industrial centers. Note: Recognizes the typology, and the role of accommodating growth. It is not stated such “Regional Industrial Employment & Industrial Growth Centers” shall not be located in the Rural Area. Also, the Appendix 1 Land-Use Map does not show the locations of the RMICs. |

Urban Design and Historic Preservation
Develop neighborhood planning and design processes that encourage infill development, redevelopment, and reuse of existing buildings and that, where appropriate based on local plans, enhance the existing community character and mix of uses. Plan for neighborhoods or subareas to encourage infill and redevelopment, provision of adequate public spaces, and reuse of existing buildings and underutilized lands as brownfields and greyfields to higher-density, mixed-use areas to complement the development of centers and the enhancement of existing neighborhoods.

MPP-DP-2 Reduce disparities in access to opportunity for the region’s residents through inclusive community planning and targeted public and private investments that meet the needs of current and future residents and businesses.

MPP-DP-4 Support the transformation of key underutilized lands, such as surplus public lands or environmentally contaminated lands as brownfields and greyfields, to higher-density, mixed-use areas to complement the development of centers and the enhancement of existing neighborhoods.

MPP-DP-10 Design public buildings and spaces that contribute to a sense of community and a sense of place.

MPP-DP-17 Promote cooperation and coordination among transportation providers, local government, and developers to ensure that joint- and mixed-use developments are designed to promote and improve physical, mental, and social health and reduce the impacts of climate change on the natural and built environments.

MPP-DP-Action-7 Identification and Clean-up of Underused Lands: Local governments, in cooperation with state and/or federal regulatory agencies, will develop strategies for cleaning up brownfield and contaminated sites. Local jurisdictions should identify underused lands (such as environmentally contaminated land and surplus public lands) for future redevelopment or reuse.

Note: Addresses equity in planning, as well as other planning topics.
| DP-40 | Promote a high quality of design and site planning in publicly funded and private development throughout the Urban Growth Area. Where appropriate, provide for connectivity in the street network to accommodate walking, bicycling, and transit use, in order to promote health and well-being. |
| NP-3 | Preserve and Enhance existing neighborhoods and create vibrant, sustainable compact urban communities that provide diverse choices in housing types, to provide a high degree of connectivity in the street network to accommodate walking, bicycling, and transit use, and sufficient public spaces. |
| DP-12 | Design transportation projects and other infrastructure to achieve community development objectives and improve communities. |
| DP-15 | Design communities to provide an improved safe and welcoming environments for walking and bicycling. |
| DP-16 | Incorporate provisions addressing Address and integrate health and well-being into appropriate regional, countywide, and local planning practices and decision-making processes. |
| Notes: Addresses transportation issues in urban design. |

| DP-41 | Preserve significant historic, visual, archeological, cultural, architectural, artistic, and environmental features, especially where growth could place these resources at risk. Celebrate cultural resources that reflect the diversity of the community. Where appropriate, designate individual features or areas for protection or restoration. Encourage land use patterns and adopt regulations that protect historic resource, Heritage Corridors, and sustain historic community character. |
| NP-5 | Identify, protect and enhance those elements and characteristics that give the central Puget Sound region its identity, especially the natural visual resources and positive urban form elements. |
| NP-6 | Preserve significant regional historic, visual, and cultural resources, including public views, landmarks, archaeological sites, historic and cultural landscapes, and areas of special character. |
| NP-9 | Support urban design, historic preservation, and arts to enhance quality of life, support local culture, improve the natural and human-made environments, promote health and well-being, contribute to a prosperous economy, and increase the region’s resiliency in adapting to changes or adverse events. |
| Heritage Corridors are select thoroughfares designated by 4Culture, the King County department that oversees County-funded Arts, Heritage, and Preservation projects. |
| DP-42 | DP-42 | Design new development to create and protect systems of green infrastructure, such as urban forests, parks, green roofs, and natural drainage systems, in order to reduce climate-altering pollution and increase resilience of communities to climate change impacts. Prioritize neighborhoods with historical underinvestment in green infrastructure. Use natural features crossing jurisdictional boundaries to help determine the routes and placement of infrastructure connections and improvements. |
| DP-43 | DP-43 | Design communities, neighborhoods, and individual developments using techniques that reduce heat absorption, particularly in Urban Centers, Regional and Countywide Centers and residential neighborhoods with less tree canopy and open spaces. |
| DP-44 | DP-44 | Adopt flexible design standards, incentives, or guidelines that foster green building, multimodal transportation, and infill development that is compatible with enhancing the existing or desired urban character. |

**MPP-DP-13** Allow natural boundaries to help determine the routes and placement of infrastructure connections and improvements.

**MPP-DP-14** Recognize and work with linear systems that cross jurisdictional boundaries – including natural systems, continuous land use patterns, and transportation and infrastructure systems – in community planning, development, and design.

*Note: Expands integration with natural systems in planning.*

**MPP-DP-19** Develop and implement design guidelines to encourage construction of healthy buildings and facilities to promote healthy people.

**MPP-DP-46** Support and provide incentives to increase the percentage of new development and redevelopment – both public and private – to be built at higher performing energy and environmental standards.

**MPP-DP-47** Streamline development standards and regulations for residential and commercial development and public projects, especially in centers and high-capacity transit station areas, to provide flexibility and to accommodate a broader range of project types consistent with the regional vision.

*Note: Expands the range of tools to be considered.*

### Rural Area and Resource Lands

#### Rural Area
| **DP-X5 (temporary numbering)** | **New Policy** | **MPP-DP-31** Promote transit service to and from existing cities in rural areas.  
**MPP-DP-37** Ensure that development occurring in rural areas is rural in character and is focused into communities and activity areas.  
**MPP-RGS-13** Direct Plan for commercial, retail, and community services that serve rural residents to locate in neighboring cities and existing activity areas to prevent avoid the conversion of rural land into commercial uses.  
Note: Codifies existing role of freestanding Cities in the Rural Area, and recognizes the important role they play in their contexts.  
We added this phrase because it pertains to “expanding” (e.g., widening) “existing” roads in the Rural Area, whereby the phrase the IJT added seems to only address “new” roads. If we are interpreting this incorrectly, maybe it needs to be better clarified.  
**MPP-DP-33** Do not allow urban net densities in rural and resource areas.  
Note: Adds open space lands to character of rural areas.  
**MPP-DP-45** Avoid growth in rural areas that cannot be sufficiently served by roads, utilities, and services at rural levels of service.  
**MPP-RGS-4** Accommodate the region’s growth first and foremost in the urban growth area. Ensure that development in rural areas is consistent with the regional vision and the goals of the Regional Open Space Conservation Plan.  
**MPP-RGS-14** Manage and reduce rural growth rates over time, consistent with the Regional Growth Strategy, to maintain rural landscapes and lifestyles and protect resource lands and the environment. |
| **DP-45** | **Limit growth in the Rural Area to prevent sprawl and the overburdening of rural services, reduce and avoid the need for new rural infrastructure, maintain rural character, and protect open spaces and the natural environment. Limit public investment in capital projects to focus on maintaining rural service levels and safety; and avoid roadway expansions.** | **MPP-DP-33** |
| DP-46 | DP-46 | Limit residential development in the Rural Area to housing at low densities that are compatible with rural character and comply with the following density guidelines:  
  a) One home per 20 acres where a pattern of large lots exists and to buffer Forest Protection Districts and Agricultural Districts;  
  b) One home per 10 acres where the predominant lot size is less than 20 acres; or  
  c) One home per five acres where the predominant lot size is less than 10 acres.  
  d) Prohibit upzones; consider downzones if property owner requested; Establish clear criteria for all rural zoning categories to protect rural character and control rural development.  
  e) Reduce subsidies for rural development by adopting impact fees for transportation, fire facilities, and other public facilities that recover capital costs of serving development.  
  Allow limited clustering within development sites to avoid prevent development on environmentally critical lands or on productive forest or agricultural lands, but not to exceed the density guidelines cited in (a) through (c). | MPP-DP-33 Do not allow urban net densities in rural and resource areas. |
| DP-47 | DP-47 | Limit the extension of urban infrastructure improvements through the Rural Area to only cases where it is necessary to serve the Urban Growth Area and where there are no other feasible alignments. Such limited extensions may be considered only if land use controls are in place to restrict uses appropriate for the Rural Area and only if access management controls are in place to prohibit tie-ins to the extended facilities. Transit service may cross non-urban lands to serve cities in the Rural Area. | MPP-DP-37 Ensure that development occurring in rural areas is rural in character and is focused into communities and activity areas.  
 MPP-DP-38 Maintain the long-term viability of permanent rural land by avoiding the construction of new highways and major roads in rural areas.  
 Note: Supports transit service in outlying areas, when economic viable. |
| DP-48 | DP-48 | Establish rural development standards and strategies to ensure all development protects the natural environment, including farmlands and forest lands, by using seasonal and maximum clearing limits for vegetation, limits on the amount of impervious surface, surface water management standards that preserve natural drainage systems, water quality and groundwater recharge, and best management practices for resource based activities. | **MPP-DP-32** Contribute to improved ecological functions and more appropriate use of rural lands by minimizing impacts through innovative and environmentally sensitive land use management and development practices.  
**MPP-DP-36** Use existing and new tools and strategies to address vested development to ensure that future growth meets existing permitting and development standards and prevents further fragmentation of rural lands.  
**MPP-DP-39** Support long-term solutions for the environmental and economic sustainability of agriculture and forestry within rural areas.  
**MPP-DP-41** Establish best management practices that protect the long-term integrity of the natural environment, adjacent land uses, and the long-term productivity of resource lands.  
*Note: Expands from standards to include strategies to protect these resources.* |
| DP-49 | DP-49 | Prevent or, if necessary, mitigate negative impacts of urban development to the adjacent Rural Area. Prevent industrial-scale development that occurs within the Rural Area. Prevent industrial-scale development within the Rural Area. | **MPP-PS-6** Encourage the design of public facilities and utilities in rural areas to be at a size and scale appropriate to rural locations, so as not to increase development pressure. |
| DP-50 | DP-50 | Except as provided in Appendix 5 (March 31, 2012 School Siting Task Force Report), limit new nonresidential uses located in the Rural Area to those that are demonstrated to serve the Rural Area, unless the use is dependent upon a rural location. Such uses shall be of a size, scale, and nature that is consistent with rural character. | **MPP-DP-37**: Ensure that development occurring in rural areas is rural in character and is focused into communities and activity areas.  
**MPP-PS-6** Encourage the design of public facilities and utilities in rural areas to be at a size and scale appropriate to rural locations, so as not to increase development pressure.  
*Several of us served on the 2011/2012 SSTF and do not recall this statement being included in the final agreement.* |
| DP-51 | Allow cities that own property in the Rural Area to enter into interlocal agreements with King County to allow the cities to provide services to the properties they own as long as the cities agree to not annex the property or serve it with sewers or any infrastructure at an urban level of service. The use of the property must be consistent with the rural land use policies in the Countywide Planning Policies and the King County Comprehensive Plan. | MPP-DP-41 Establish best management practices that protect the long-term integrity of the natural environment, adjacent land uses, and the long-term productivity of resource lands. |
| DP-52 | Promote and support forestry, agriculture, mining and other resource-based industries outside of the Urban Growth Area as part of a diverse and sustainable regional economy. Avoid redesignating natural resource lands to rural. | MPP-DP-39: Support long-term solutions for the environmental and economic sustainability of agriculture and forestry within rural areas. We understand “mining” is listed because it always has been an allowed use on rural- and forest-zoned lands. However, we do not want to encourage any new mines. Note the MPP only identifies “agriculture and forestry.” |
| DP-53 | Conserve commercial agricultural and forestry resource lands primarily for their long-term productive resource value and for the open space, scenic views, wildlife habitat, and critical area protection they provide. Limit Avoid redesignation to non-resource uses and limit the subdivision of land so that parcels remain large enough for commercial resource production. | MPP-DP-42 Support the sustainability of designated resource lands. Do not convert these lands to other uses. Note: Expands policy to address range of issues. |
| DP-54 | Encourage best practices in agriculture and forestry operations for long-term protection of the natural resources, habitat, and workers. | Note: Addressing equity and environment. |
| DP-55 | Prohibit annexation of lands within designated Agricultural Production Districts or within Forest Production Districts by cities. | MPP-DP-42 Support the sustainability of designated resource lands. Do not convert these lands to other uses. |
| DP-56 | Retain the Lower and Upper Green River Agricultural Production Districts as a regionally designated resource that is are to remain in unincorporated King County. | |
| DP-57 | Discourage Prevent incompatible land uses adjacent to designated Resource Lands to prevent avoid interference with their continued use for the production of agricultural, mining, or forest products. | MPP-DP-43 Ensure that resource lands and their related economic activities are not adversely impacted by development on adjacent non-resource lands. |
| DP-58 | DP-58 | Support agricultural, farmland, and aquatic uses that enhance the food system, and promote local production and processing of food to reduce the need for long distance transport and to increase the reliability and security of local food. Promote activities and infrastructure, such as farmers markets, farm worker housing and agricultural processing facilities, that benefit both cities and farms by improving access to locally grown agricultural products. |
| DP-59 | DP-59 | Support institutional procurement policies that encourage purchases of locally grown food products. |
| DP-60 | DP-60 | Ensure that extractive industries and industrial-scale operations on resource lands maintain environmental quality and minimize negative impacts on adjacent lands, and ensure full reclamation and restoration of the land after closure. |
| DP-61 | DP-61 | Use a range of tools, including land use designations, development regulations, level-of-service standards, and transfer or purchase of development rights to preserve Rural and Resource Lands and focus urban development within the Urban Growth Area. **Prohibit redesignations of resource lands (forest, agriculture, mineral) to rural residential uses.** |

**MPP-DP-20** Support agricultural, farmland, and aquatic uses that enhance the food system in the central Puget Sound region and its capacity to produce fresh and minimally processed foods.  
*Note: Recognizes importance of these lands to food issues.*

**MPP-DP-44** Work to conserve valuable rural and resource lands through techniques, such as conservation programs. Encourage the use of innovative techniques, including the transfer of development rights, and the purchase of development rights, and conservation incentives. Use these techniques to focus growth within the urban growth area, (especially cities), to lessen pressures to convert rural and resource areas to more intense urban-type development, while protecting the future economic viability of sending areas and sustaining rural and resource-based uses.  
*We support the various aspects of this policy, but are concerned about the specific details of actual examples of closed mines that seek re-development into large residential tracts, while still being the subject of the state’s model toxics control act (MTCA) and remain highly polluted and under rigorous long-term monitoring. we also have seen examples where mining, materials processing, composting facilities, and solid waste landfills have either been expanded in footprint or become far busier than originally intended—all to the detriment (i.e., noise, air and water pollution, road congestion, etc.) of nearby rural area residents, thus becoming more and more incompatible in their rural locations. We are glad to see the “to residential uses” addition made above.*
### DP-62

**Use transfer of development rights to shift potential development from the Rural Area and Resource Lands into the Urban Growth Area, especially cities.** Implement transfer of development rights within King County through a partnership between the county and cities that is designed to:
- **a)** Identify rural and resource sending sites that satisfy countywide conservation goals and are consistent with regionally coordinated transfer of development rights efforts;
- **b)** Preserve rural and resource lands of compelling interest countywide and to participating cities;
- **c)** Identify appropriate transfer of development rights receiving areas within cities;
- **d)** Identify incentives for city participation in regional transfer of development rights (i.e. county-to-city transfer of development rights);
- **e)** Develop interlocal agreements that allow rural and resource land development rights to be used in city receiving areas;
- **f)** Identify and secure opportunities to fund or finance infrastructure within city transfer of development rights receiving areas; and
- **g)** Be compatible with existing within-city transfer of development rights programs.

**Note: Sub-bulleting consistency.**

**VISION 2050** contains a section at the end of its “Development Patterns” chapter called “supporting growth through concurrency.” It contains three MPPs. Yet, the CPPs have nothing equivalent. In particular, we recommend adding a new “DP” similar to the following:

**MPP-DP-52** Develop, implement, and evaluate concurrency programs and methods that fully consider growth targets, service needs, and level-of-service standards. Focus level-of-service standards for transportation on the movement of people and goods instead of only on the movement of vehicles.

We fully support modernizing concurrency to introduce a “regional” perspective. The “silo-mentality” of concurrency testing never made sense and has proven to be a failure. Also, we fully support eliminating the omission of not requiring concurrency testing for Highways of Statewide Significance (HSS), which essentially gave them a pass, thus making local concurrency testing incomplete, at best, and largely ineffective, at worst. We have been told by state legislators this was never their intent. It must be fixed otherwise Concurrency cannot be implemented as it was meant to be.

### Housing

**GENERAL COMMENTS—**While we understand the desire to establish “housing targets,” we are wary that, in the absence of meaningful levels of potential employment opportunities, a severely skewed “job-housing balance” could and, most likely will, be the unintended result. In fact, achieving “housing targets” is insufficient without also concentrating on attracting jobs. Consequently, we urge that local comprehensive plans couple and, thus, focus on both jobs and housing simultaneously and describe how a “job-housing balance” will be achieved and maintained.

<table>
<thead>
<tr>
<th>H-Overarching Goal</th>
<th>Housing Overarching Goal</th>
<th>Plan for housing supply, forms and densities to meet the region’s current and projected needs consistent with the Regional Growth Strategy and to make significant progress towards jobs/housing balance.</th>
</tr>
</thead>
<tbody>
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<td>Plan for housing supply, forms and densities to meet the region’s current and projected needs consistent with the Regional Growth Strategy and to make significant progress towards jobs/housing balance.</td>
<td></td>
</tr>
</tbody>
</table>

**Notes:** Revised to reflect actions to take an equity orientation
Housing Inventory and Needs Analysis
Address the countywide need for housing affordable to households with moderate, low, and very low, and extremely low incomes, (including those with special needs), at a level that calibrates with the jurisdiction’s identified affordability gap for those households. The countywide need for housing in 2044 by percentage of Area Median Income (AMI) is: 50-80% of AMI (moderate) 16% of total housing supply; 30-50% of AMI (low) 12% of total housing supply; 30% and below AMI (very low) 12% of total housing supply; 30% and below AMI (extremely low) 15% of total housing supply; 31-50% of AMI (very low) 15% of total housing supply, and 51-80% of AMI (low) 19% of total housing supply.

Table H-1 provides additional context on the countywide need for housing.

<table>
<thead>
<tr>
<th>AMI Category</th>
<th>Housing Units Needed (2019-2044)</th>
<th>Total Additional Affordable Housing Units Needed</th>
</tr>
</thead>
<tbody>
<tr>
<td>At or Below 30% AMI</td>
<td>105,000</td>
<td>144,000</td>
</tr>
<tr>
<td>Between 31% and 50% AMI</td>
<td>31,000</td>
<td>63,000</td>
</tr>
<tr>
<td>At or Below 80% AMI</td>
<td>23,000</td>
<td>56,000</td>
</tr>
<tr>
<td>At or Below 80% AMI</td>
<td>159,000</td>
<td>263,000</td>
</tr>
</tbody>
</table>

MPP-H-1 Plan for housing supply, forms and densities to meet the region’s current and projected needs consistent with the Regional Growth Strategy and to make significant progress towards jobs/housing balance.

Notes: Incorporates an adjusted Regional Affordable Housing Task Force (RAHTF) approach of defining countywide need. Ensures strategies are calibrated with the countywide need. Changes to the area median income (AMI) categories per new Growth Management Act (GMA) definitions. Supports distributional equity.
### H-2

**Address Prioritize** the need for housing affordable to households at less than 30% AMI (very extremely low income) by implementing tools such as:
- recognizing that this is where the greatest need exists, and addressing this need will require funding, policies, and collaborative actions by all jurisdictions working individually and collectively.
- capital, operations, and maintenance funding;
- complementary land use regulations;
- welcoming communities;
- supportive policies; and
- collaborative actions by all jurisdictions.

### MPP-H-4

Address the need for housing affordable to low- and very low-income households, recognizing that these critical needs will require significant public intervention through funding, collaboration, and jurisdictional action.

Notes: Aligns with the new GMA AMI categories and broadens the types of inputs that make housing for extremely low-income households feasible. Supports distributional equity.
Conduct an inventory and analysis in each jurisdiction of existing and projected housing needs of all economic and demographic segments of the population in each jurisdiction and summarize the findings in the housing element. The analysis and inventory and analysis shall include:

a. Characteristics of the existing housing stock, including supply, affordability and diversity of housing types;

b. Characteristics of populations, including projected growth and demographic change;

c. The housing needs of very-low, low, and moderate-income households; and

d. The housing needs of special needs populations.

a. affordability gap of the jurisdiction’s housing supply as compared to countywide need percentages from policy H-1 (see table H-2 in Appendix);

b. number of existing housing units by housing type, age, number of bedrooms, occupants per room, condition, tenure, and AMI limit (for income-restricted units);

c. percentage of residential land zoned for and geographic distribution of moderate- and high-density housing in the jurisdiction;

d. number of units, including number of income-restricted units, within a half-mile walkshed of high capacity or frequent transit stations and regional and countywide centers;

e. household characteristics, by race/ethnicity:
   i. income (median and by AMI bracket)
   ii. tenure
   iii. size
   iv. housing cost burden and severe housing cost burden;

f. current population characteristics, by race/ethnicity:
   i. age
   ii. disability;

g. projected population growth and demographic change;

h. housing development capacity within a half-mile walkshed of high capacity or frequent transit;

i. ratio of housing to jobs in the jurisdiction;

j. summary of existing and proposed partnerships and strategies, including dedicated resources, for meeting countywide housing need, particularly for populations disparately impacted;

k. the housing needs of people who need supportive services or accessible units, including but not limited to people experiencing homelessness, disabled persons, people with medial conditions, and older adults, and...
| H-4 | New Policy | Evaluate the effectiveness of existing housing policies and strategies to meet a significant share of countywide need. Identify gaps in existing partnerships, policies, and dedicated resources for meeting the countywide need and eliminating racial and other disparities in access to housing and neighborhoods of choice. | **H-Action-4 Local Housing Needs:** Counties and cities will conduct a housing needs analysis and evaluate the effectiveness of local housing policies and strategies to achieve housing targets and affordability goals to support updates to local comprehensive plans. Analysis of housing opportunities with access to jobs and transportation options will aid review of total household costs.  
*Notes:* New policy to evaluate effectiveness of housing efforts. |
| H-5 | New Policy | Document the local history of racially exclusive and discriminatory land use and housing practices, consistent with local and regional fair housing reports and other resources. Explain the extent to which that history is still reflected in current development patterns, housing conditions, tenure, and access to opportunity. Demonstrate how current strategies are addressing impacts of those racially exclusive and discriminatory policies and practices. The County will support jurisdictions in identifying and compiling resources to support this analysis. | **MPP-H-5** Promote homeownership opportunities for low-income, moderate-income, and middle-income families and individuals while recognizing historic inequities in access to homeownership opportunities for communities of color.  
**MPP-H-12** Identify potential physical, economic, and cultural displacement of low-income households and marginalized populations that may result from planning, public investments, private redevelopment, and market pressure. Use a range of strategies to mitigate displacement impacts to the extent feasible.  
*Notes:* New policy to understand contributing factors to regional and local housing disparities by race. Supports reparative policies. |

### Regional Cooperation-Collaboration

| H-6 | H-14 and H-15 | Work cooperatively among jurisdictions to provide mutual support in meeting countywide housing growth targets and affordable housing needs. Collaborate in developing sub-regional and countywide housing resources and programs, including funding, to provide affordable housing for very-low, low, and moderate-income households. Collaborate with diverse partners (e.g. employers, financial institutions, philanthropic, faith, and community-based organizations) on provision of resources (e.g. funding, surplus property) and programs to meet countywide housing need. | **MPP-H-11** Encourage interjurisdictional cooperative efforts and public-private partnerships to advance the provision of affordable and special needs housing  
*Notes:* Merged two similar policy concepts together and clarified who jurisdictions should collaborate with. |
Work cooperatively with the Puget Sound Regional Council and other agencies to identify ways to expand technical assistance to local jurisdictions in developing, implementing, and monitoring the success of strategies that achieve the goals of this chapter, promote affordable housing that meets changing demographic needs. Collaborate in developing and implementing a housing strategy for the four county central Puget Sound region.

**H-Action-1 Regional Housing Strategy**: PSRC, together with its member jurisdictions, state agencies, housing interest groups, housing professionals, advocacy and community groups, and other stakeholders will develop a comprehensive regional housing strategy to support the 2024 local comprehensive plan update. The housing strategy will provide the framework for regional housing assistance (see H-Action-2, below) and shall include the following components:

- In the near term, a regional housing needs assessment to identify current and future housing needs to support the regional vision and to make significant progress towards jobs/housing balance and quantify the need for affordable housing that will eliminate cost burden and racial disproportionality in cost burden for all economic segments of the population, including those earning at or below 80 percent of Area Median Income throughout the region. This will provide necessary structure and focus to regional affordable housing discussions.
- Strategies and best practices to promote and accelerate: housing supply, the preservation and expansion of market rate and subsidized affordable housing, housing in centers and in proximity to transit, jobs-housing balance, and the development of moderate-density housing options.
- Coordination with other regional and local housing efforts.

**H-Action-2 Regional Housing Assistance**: PSRC, in coordination with subregional, county, and local housing efforts, will assist implementation of regional housing policy and local jurisdiction and agency work. Assistance shall include the following components:

- Guidance for developing local housing targets (including affordable housing targets), model housing policies, and best housing practices.
- Technical assistance, including new and strengthened tools, to support local jurisdictions in developing effective housing strategies, action plans, and programs.
- Collection and analysis of regional housing data.
| H-8 | New Policy | Collaborate with populations most disproportionately impacted by housing cost burden in developing, implementing and monitoring strategies that achieve the goals of this chapter. Prioritize the needs and solutions articulated by these disproportionately impacted populations. | **H-Action-6 Displacement**: Metropolitan Cities, Core Cities, and High Capacity Transit Communities will develop and implement strategies to address displacement in conjunction with the populations identified of being at risk of displacement including residents and neighborhood-based small business owners.  
Notes: New policy recognizes the need to ensure that housing policy development, decision-making, and implementation is inclusive and serves those most disproportionately impacted by the housing crisis. Supports process equity. |
|---|---|---|---|
| H-9 | New Policy | Adopt intentional, targeted actions that repair harms to Black, Indigenous, and People of Color (BIPOC) households from past and current racially exclusive and discriminatory land use and housing practices (generally identified through Policy H-5). Promote equitable outcomes in partnership with communities most impacted. | **MPP-H-5** Promote homeownership opportunities for low-income, moderate-income, and middle-income families and individuals while recognizing historic inequities in access to homeownership opportunities for communities of color.  
**MPP-H-12** Identify potential physical, economic, and cultural displacement of low-income households and marginalized populations that may result from planning, public investments, private redevelopment, and market pressure. Use a range of strategies to mitigate displacement impacts to the extent feasible.  
Notes: New policy to repair harm to communities impacted by exclusionary land use policy in partnership with those impacted. Supports reparative policies and cross-generational and process equity. |
| H-10 | H-5 | Adopt policies, incentives, strategies, actions, and regulations at the local and countywide levels that promote housing supply, affordability, and diversity, including those that address a significant share of the countywide need for housing affordable to very-low, very low, and moderate low-income households and households with special needs. These strategies should address the following:
  a. Overall supply and diversity of housing, including both rental and ownership;
  b. Housing suitable for a range of household types and sizes;
  c. Affordability to very-low, low, and moderate income households;
  d. Housing suitable and affordable for households with special needs;
  e. Universal design and sustainable development of housing; and
  f. Housing supply, including affordable housing and special needs housing, within Urban Centers and in other areas planned for concentrations of mixed land-uses.

| MPP-H-3 | Achieve and sustain – through preservation, rehabilitation, and new development – a sufficient supply of housing to meet the needs of low-income, moderate-income, middle-income, and special needs individuals and households that is equitably and rationally distributed throughout the region.

| H-11 | H-7 | Identify, implement strategies to overcome cost barriers to housing affordability and implement strategies to overcome them. Strategies to do this vary but can include updating development standards and regulations, shortening permit timelines, implementing online permitting, optimizing residential densities, reducing parking requirements, and developing programs, policies, partnerships, and incentives to decrease costs to build and preserve affordable housing.

| MPP-H-10 | Encourage jurisdictions to review and streamline development standards and regulations to advance their public benefit, provide flexibility, and minimize additional costs to housing.

| H-Action-5 Affordable Housing Incentives: | As counties and cities plan for and create additional housing capacity consistent with the Regional Growth Strategy, evaluate and adopt techniques such as inclusionary or incentive zoning to provide affordability.

Notes: References incentives and more clearly specifies the reason for adoption. Includes a new provision for meeting the countywide need and needs of special needs populations. Supports distributional equity.

| MPP-H-10 | Housing Choice: Counties and cities will update regulations and strategies to reduce barriers to the development and preservation of moderate density housing to address the need for housing between single-family and more intensive multifamily development, consistent with the Regional Growth Strategy.

| H-Action-8 Housing Production: | Counties and cities will review and amend, where appropriate and consistent with the Regional Growth Strategy, development standards and regulations to reduce barriers to the development of housing by providing flexibility and minimizing additional costs.

Notes: Adds greater specificity about the type of barriers that need to be overcome to meet countywide need.
| H-12 | New Policy | Prioritize the use of local and regional resources (e.g., funding, surplus property) for income-restricted housing, particularly for extremely low-income households, special needs populations, and others with disproportionately greater housing needs. Consider projects that promote access to opportunity, anti-displacement, and wealth building for Black, Indigenous, and People of Color communities to support implementation of policy H-9. |
| MPP-H-4 | Address the need for housing affordable to low- and very low-income households, recognizing that these critical needs will require significant public intervention through funding, collaboration, and jurisdictional action. |
| MPP-H-5 | Promote homeownership opportunities for low-income, moderate-income, and middle-income families and individuals while recognizing historic inequities in access to homeownership opportunities for communities of color. |
| Notes: New policy to support equitably meeting the greatest needs. Supports distributional and cross-generational equity. |
| H-13 | H-9 | Plan for housing that is accessible to the workforce in them so people of all incomes can live near or within commuting distance of their places of work. Encourage increase housing choices for everyone—particularly those earning lower wages—in locations accessible to or within a reasonable commute to major employment centers and affordable to all income levels. Ensure there are zoning ordinances and building policies in place that allow and encourage housing production at levels that improve the jobs-housing balance of housing to employment throughout the county across all income levels. |
| MPP-H-2 | Provide a range of housing types and choices to meet the housing needs of all income levels and demographic groups within the region. |
| MPP-H-6 | Develop and provide a range of housing choices for workers at all income levels throughout the region in a manner that promotes accessibility to jobs and provides opportunities to live in proximity to work that is accessible to job centers and attainable to workers at anticipated wages. |
| Notes: Sharpens focus on housing choice and achieving a jobs/housing balance tailored to the needs of the county’s low-wage workforce. Supports distributional equity. |
| H-14 | New Policy | Expand the supply and range of housing types—including affordable units—at densities sufficient to maximize the benefits of transit investments throughout the county. |
| MPP-H-7 | Expand the supply and range of housing at densities to maximize the benefits of transit investments, including affordable units, in growth centers and station areas throughout the region. |
| Notes: New policy encourages more housing units and types to achieve affordability near transit and areas targeted for growth. Supports distributional equity. |
| H-15 | H-10 | **Promote housing affordability in coordination with transit, bicycle, and pedestrian plans and investments and in proximity to transit hubs and corridors, such as through transit-oriented development and planning for mixed uses in transit station areas.** Support the development and preservation of income-restricted affordable housing that is within walking distance to high capacity and frequent transit. |
| MPP-H-8 | **Promote the development and preservation of long-term affordable housing options in walking distance to transit by implementing zoning, regulations, and incentives.** **Notes: Encourages the development and preservation of affordable housing near transit. Supports distributional equity.** |
|   |   | Provide zoning capacity within each jurisdiction in the Urban Growth Area for a range of housing types and densities, sufficient to accommodate each jurisdiction’s overall housing targets and, where applicable, housing growth targets in designated urban centers. Adopt inclusive planning tools and policies whose purpose is to increase the ability of all residents to live in the neighborhood of their choice, reduce disparities in access to opportunity areas, and meet the needs of the region’s current and future residents by:
|   |   | a. providing access to affordable housing to rent and own throughout the jurisdiction, with a focus on areas of high opportunity;
|   |   | b. expanding capacity for moderate density housing throughout within the jurisdiction, especially in areas currently zoned for lower density single-family detached housing, In the Urban Growth Area and capacity for high-density housing, where appropriate, consistent with the Regional Growth Strategy;
|   |   | c. evaluating the feasibility of, and implementing, where appropriate, inclusionary and incentive zoning to provide affordable housing; and.
|   |   | d. providing access to housing types that serve a range of household sizes, types, and incomes, including 2+ bedroom homes for families with children and/or adult roommates and accessory dwelling units, efficiency studios, and/or congregate residences for single adults. |
|   |   | Since the entire first sentence has been removed, there no longer is any association of this entire policy with the Urban Growth Area, so what is meant by “jurisdiction” and why was “in the Urban Growth Area” removed from “sub b.”? |
|   |   | MPP-H-2 Provide a range of housing types and choices to meet the housing needs of all income levels and demographic groups within the region. |
|   |   | MPP-H-3 Achieve and sustain – through preservation, rehabilitation, and new development – a sufficient supply of housing to meet the needs of low-income, moderate-income, middle-income, and special needs individuals and households that is equitably and rationally distributed throughout the region. |
|   |   | MPP-H-9 Expand housing capacity for moderate density housing to bridge the gap between single-family and more intensive multifamily development and provide opportunities for more affordable ownership and rental housing that allows more people to live in neighborhoods across the region. Encourage the use of innovative techniques to provide a broader range of housing types for all income levels and housing needs.
|   |   | H-Action-5 Affordable Housing Incentives: As counties and cities plan for and create additional housing capacity consistent with the Regional Growth Strategy, evaluate and adopt techniques such as inclusionary or incentive zoning to provide affordability. |
|   |   | H-Action-7 Housing Choice: Counties and cities will update regulations and strategies to reduce barriers to the development and preservation of moderate density housing to address the need for housing between single-family and more intensive multifamily development, consistent with the Regional Growth Strategy. |
|   |   | Notes: Promote more affordable housing options in more places, moderate density housing, and inclusionary and incentive zoning to support housing choice. Supports distributional and cross-
<table>
<thead>
<tr>
<th>H-17</th>
<th>New Policy</th>
<th>Lower barriers to and promote access to affordable homeownership for extremely low-, very low-, and low-income, households. Emphasize:</th>
<th>MPP-H-5</th>
<th>Promote homeownership opportunities for low-income, moderate-income, and middle-income families and individuals while recognizing historic inequities in access to homeownership opportunities for communities of color.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>a. supporting long-term affordable homeownership opportunities for households earning at or below 80% AMI (which may require up-front initial public subsidy and policies that support diverse housing types); and</td>
<td></td>
<td>Notes: New policy to promote affordable homeownership to further reduce the racial homeownership gap. Supports cross-generational and distributional equity.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>b. remedying historical inequities in and expanding access to homeownership opportunities for Black, Indigenous and People of Color communities.</td>
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</tbody>
</table>

| H-18 | H-6 | Preserve existing affordable housing units, where appropriate, including acquisition and rehabilitation of housing for long-term affordability. Promote equitable development and adopt anti-displacement strategies, including dedicated funds for land acquisition and affordable housing production and preservation. Mitigate displacement that may result from planning, public and private investments, and market pressure. Implement anti-displacement measures prior to or concurrent with development capacity increases and capital investments. | MPP-H-12 | Identify potential physical, economic, and cultural displacement of low-income households and marginalized populations that may result from planning, public investments, private redevelopment, and market pressure. Use a range of strategies to mitigate displacement impacts to the extent feasible. |
|      |     |         |         | H-Action-6 Displacement: Metropolitan Cities, Core Cities, and High Capacity Transit Communities will develop and implement strategies to address displacement in conjunction with the populations identified of being at risk of displacement including residents and neighborhood-based small business owners. |
|      |     |         |         | Notes: Addresses displacement risk and expands concept beyond housing preservation. Supports distributional equity. |

| H-19 | H-13 | Promote implement, promote and enforce fair housing and plan for communities that include residents with a range of abilities, ages, races, incomes, and other diverse characteristics of the population of the county, policies and practices so that every person in the county has equitable access and opportunity to thrive in their communities of choice, regardless of their race, gender identity, sexual identity, ability, use of a service animal, age, immigration status, national origin, familial status, religion, source of income, military status, or membership in any other relevant category of protected people. | No related MPP | Notes: Adds greater specificity about the fair housing practices. Supports distributional equity. |
| H-20 | New Policy | Adopt and implement policies that protect housing stability for renter households; expand protections and supports for low-income renters and renters with disabilities. | No related MPP  
Notes: New policy to promote housing stability for low-income renters and people with disabilities. Supports distributional equity. |
|------|------------|---------------------------------------------------------------------------------|--------------------------------------------------|
| H-21 | H-11       | Encourage the maintenance of existing housing stock in order to ensure that the condition and quality of the housing is safe and livable. Adopt and implement programs and policies that ensure healthy and safe homes. | No related MPP  
Notes: Promotes actions to ensure healthy and safe homes. Supports distributional equity. |
| H-22 | H-12       | Plan for residential neighborhoods that protect and promote the health and well-being of residents by supporting active living and healthy eating, equitable access to parks and open space, safe pedestrian and bicycle routes, clean air, soil and water, fresh and healthy foods, high-quality education from early learning through K-12, affordable and high-quality transit options and living wage jobs and by reducing exposure to harmful environments, environmental hazards and pollutants. | No related MPP  
Notes: Broadens elements that support resident health and well-being. Supports distributional and cross-generational equity. |

**Measuring Results**
Monitor housing supply, affordability, and diversity, including progress toward meeting a significant share of the countywide need for affordable housing for very low, low, and moderate income households. Monitoring should encompass: Monitor progress toward meeting countywide housing growth targets, countywide need, and eliminating disparities in access to housing and neighborhoods of choice. Where feasible, use existing regional and jurisdictional reports and monitoring tools and collaborate to reduce duplicative reporting.

Jurisdictions, including the county for unincorporated areas, will report annually to the county:

1. Number and type of new total housing units;
2. Number of units lost to demolition, redevelopment, or conversion to non-residential use;
3. Number of new units that are affordable to very low, low, and moderate-income households number income-restricted units by AMI limit, for which the city is a party to affordable housing covenants on the property title;
4. Number of affordable units newly preserved and units acquired and rehabilitated with a regulatory agreement for long-term affordability for very low, low, and moderate-income households total income-restricted units by AMI limit, for which the city is a party to affordable housing covenants on the property title;
5. Number of new housing units created during the reporting period, and what type of housing was constructed, broken down by at least single-family, moderate density housing types, high density housing types;
6. Housing market trends including affordability of overall housing stock total income-restricted units, net new income-restricted units, by tenure, AMI limit, address, and term of rent and income restrictions, created during the reporting period;
7. Changes in zoned capacity for housing, including housing densities and types—percentage of total zoned residential capacity by type of housing allowed, including but not limited to single-family, moderate density, and high density;
8. The number and nature of fair housing complaints and violations new strategies (e.g., land use code changes, dedicated fund sources, conveyance of surplus property) implemented during the reporting period to increase housing diversity or increase the supply of income-restricted units in the jurisdiction; and
9. Housing development and market trends in Urban Centers jurisdiction’s new strategies implemented during the reporting period to reduce disparate housing outcomes and expand housing and

H-Action-2 Regional Housing Assistance: PSRC, in coordination with subregional, county, and local housing efforts, will assist implementation of regional housing policy and local jurisdiction and agency work. Assistance shall include the following components:

- Guidance for developing local housing targets (including affordable housing targets), model housing policies, and best housing practices
- Technical assistance, including new and strengthened tools, to support local jurisdictions in developing effective housing strategies, action plans, and programs
- Collection and analysis of regional housing data, including types and uses of housing and effectiveness of zoning, regulations, and incentives to achieve desired outcomes
- Technical assistance in support of effective local actions to address displacement, including data on displacement risk and a toolbox of local policies and actions

H-Action-4 Local Housing Needs: Counties and cities will conduct a housing needs analysis and evaluate the effectiveness of local housing policies and strategies to achieve housing targets and affordability goals to support updates to local comprehensive plans. Analysis of housing opportunities with access to jobs and transportation options will aid review of total household costs.

Notes: Makes monitoring a shared responsibility of local jurisdictions and regional partners, via existing reports and monitoring tools. Narrows to data that can reasonably be collected annually and adds new data to understand changes in outcomes for those most disproportionately impacted.
<table>
<thead>
<tr>
<th>H-24</th>
<th>New Policy</th>
<th>The county will annually provide transparent, ongoing information measuring jurisdictions’ progress toward meeting countywide affordable housing need, according to H-23, using public-facing tools such as the King County’s Affordable Housing Dashboard.</th>
</tr>
</thead>
</table>
|      |            | **H-Action-2 Regional Housing Assistance:** PSRC, in coordination with subregional, county, and local housing efforts, will assist implementation of regional housing policy and local jurisdiction and agency work. Assistance shall include the following components:  
  - Guidance for developing local housing targets (including affordable housing targets), model housing policies, and best housing practices  
  - Technical assistance, including new and strengthened tools, to support local jurisdictions in developing effective housing strategies, action plans, and programs  
  - Collection and analysis of regional housing data, including types and uses of housing and effectiveness of zoning, regulations, and incentives to achieve desired outcomes  
  - Technical assistance in support of effective local actions to address displacement, including data on displacement risk and a toolbox of local policies and actions  

**H-Action-4 Local Housing Needs:** Counties and cities will conduct a housing needs analysis and evaluate the effectiveness of local housing policies and strategies to achieve housing targets and affordability goals to support updates to local comprehensive plans. Analysis of housing opportunities with access to jobs and transportation options will aid review of total household costs.  

Notes: Makes monitoring a shared responsibility of local jurisdictions and regional partners, via existing reports and monitoring tools. Narrows to data that can reasonably be collected annually and adds new data to understand changes in outcomes for those most disproportionately impacted.
| H-25 | H-18 | Review and amend, at a minimum every five years, the countywide and local housing policies and strategies and actions when, especially where monitoring in Policy H-23 and H-24 indicates that adopted strategies are not resulting in adequate affordable housing to meet the jurisdiction's share of the countywide need. Consider amendments to land use policies and the land use map where they present a significant barrier to the equitable distribution of affordable housing. | No related MPP  
Notes: Reflects that a five-year timeline does not line up with the eight-year planning cycle. Adds reference to policies stating what data should be monitored to determine whether adopted strategies are resulting in adequate affordable housing to meet the jurisdiction's share of countywide need. Adds considerations for equitable distribution of affordable housing. |

| n/a | H-8 | Tailor housing policies and strategies to local needs, conditions and opportunities, recognizing the unique strengths and challenges of different cities and sub-regions. Jurisdictions may consider a full range of programs, from optional to mandatory, that will assist in meeting the jurisdiction's share of the countywide need for affordable housing. | No related MPP  
Notes: Deleted policy H-8 because the concepts are covered in other policies. |

**Economy**  
**GENERAL COMMENTS**—We consider many of the policies in this chapter as critical to ensuring the integrity of the Rural Area as the region grows. We support policies to promote a better “balance between jobs and housing.” We do see some major problems with compatibility due to old “legacy” industrial zoning in the Rural Area. Two examples are: The proposed move of an Asphalt Facility from the City of Covington, inside the Urban Growth Area, to the Rural Area along the Cedar River, the Enumclaw Recycling Center, and the once-proposed Marijuana Factory in a residential neighborhood near a church in the Rural Area. None of these examples are in “Cities in the Rural Areas.” We seek recognition of these irregularities and consistency here.

| EC-1 | EC-1 | Coordinate local and countywide economic policies and strategies with VISION 2040-2050 and the Regional Economic Strategy. |  |

| EC-2 | EC-2 | Support economic growth that accommodates employment growth targets (see table DP-1) through local land use plans, infrastructure development, and implementation of economic development strategies. Prioritize growth of a diversity of middle-wage jobs and prevent the loss of such jobs from the region. | MPP-EC-9 Promote economic activity and employment growth that creates widely shared prosperity and sustains a diversity of family living wage jobs for the region’s residents.  
MPP-EC-21 Concentrate a significant amount of economic growth in designated centers and connect them to each other in order to strengthen the region’s economy and communities and to promote economic opportunity.  
Note: Adds middle wage jobs for economic equity. |

| EC-3 | EC-3 | Identify and support industry clusters and their related subclusters within King County that are integral components of the Regional Economic Strategy or that may otherwise emerge as having significance to and King County’s economy. Emphasize support for clusters that are vulnerable or threatened by market forces; that provide middle-wage jobs; that play an outsized role in the local economy; or that have significant growth potential. | MPP-EC-3 Support established and emerging efforts to retain and expand industry clusters that export manufacture goods and provide services for export, increasing capital in the region, and import capital, and have growth potential.  
Note: Identifies key industries for King County. |
| EC-4 | EC-4 | Evaluate the performance of economic development policies and strategies in business development and middle-wage job creation. Identify and track key economic metrics to help jurisdictions and the county as a whole evaluate the effectiveness of local and regional economic strategies. |
| MPP-EC-9 | Promote economic activity and employment growth that creates widely shared prosperity and sustains a diversity of family living-wage jobs for the region’s residents. |
| Note: Adds middle wage jobs for economic equity. |

**Business Development**

| EC-5 | EC-5 | Help businesses thrive through: |
| MPP-EC-2 | Foster a positive business climate by encouraging regionwide and statewide collaboration among business, government, utilities, education, labor, military, workforce development, and other nonprofit organizations. |
| - Transparency, efficiency, and predictability of local regulations and policies; |
| - Communication and partnerships between business, government, schools, and research institutions; and |
| - Government contracts with local businesses. |

| EC-6 | EC-6 | Foster the retention and development of those businesses and industries that export their goods and services outside the region—manufacture goods and provide services for export. |
| MPP-EC-3 | Support established and emerging efforts to retain and expand industry clusters that export manufacture goods and provide services for export, increasing capital in the region, and import capital, and have growth potential. |
| Note: More accurately describes King County’s economy. |

| EC-7 | EC-7 | Promote an economic climate that is supportive of business formation, expansion, and retention, and emphasizes the importance of small businesses, locally owned businesses, women-owned businesses, and businesses with Black, Indigenous, immigrant, and other owners of color, in creating jobs. |
| MPP-EC-1 | Support economic development activities that help to recruit, retain, expand, or diversify the region’s businesses, targeted. Target recruitment activities towards businesses that provide family living-wage jobs. |
| MPP-EC-7 | Foster a supportive environment for business startups, small businesses, and locally owned, and women- and minority-owned businesses to help them continue to prosper. |

| EC-8 | EC-8 | Foster a broad range of public-private partnerships to implement economic development policies, programs and projects, including partnerships involving community groups, and ensure such partnerships share decision-making power with and spread benefits to community groups. Use partnerships to foster connections between employers, local vocational and/educational programs and community needs. |
| MPP-EC-13 | Address unique obstacles and special needs— as well as recognize the special assets—of disadvantaged populations in improving the region’s shared economic future. Promote equity and access to opportunity in economic development policies and programs. Expand employment opportunity to improve the region’s shared economic future. |
| EC-9 | EC-9 | Identify, and support the retention of, support, and leverage key regional and local assets to the economy, including assets that are unique to our region’s position as an international gateway, such as major airports, seaports, educational facilities, research institutions, health care facilities, long-haul trucking facilities, and manufacturing facilities, and port facilities. | MPP-EC-4 Leverage the region’s position as an international gateway by supporting businesses, airports, seaports, and agencies involved in traderelated activities.  
MPP-EC-5 Recognize the region’s airports as critical economic assets that support the region’s businesses, commercial aviation activities, aerospace manufacturing, general aviation, and military missions. |
| EC-10 | EC-10 | Support the regional food economy including the production, processing, wholesaling, and distribution of the region’s agricultural food and food products to all King County communities. Emphasize increasing improving access to those for communities with limited presence of healthy, affordable, and culturally-relevant food options. | MPP-EC-23 Support economic activity in rural and natural resource areas at a size and scale that is compatible with the long-term integrity and productivity of these lands. |

### People

| EC-11 | EC-11 | Work with schools and other institutions to increase graduation rates and sustain a highly-educated and skilled local workforce. This includes aligning job training and education offerings that are consistent with the skill needs of the region’s industry clusters. Identify partnership and funding opportunities where appropriate. Align workforce development efforts with Black, Indigenous, and other communities of color and immigrant communities. | MPP-EC-10 Ensure that the region has a high-quality education system that is accessible to all of the region’s residents.  
MPP-EC-11 Ensure that the region has high-quality and accessible training programs that give people opportunities to learn, maintain, and upgrade skills necessary to meet the current and forecast needs of the regional and global economy. |
<p>| EC-12 | EC-12 | Celebrate the cultural diversity of local communities as a means to enhance social capital, neighborhood cohesion, the county’s global relationships, and support for cultural and arts institutions. | MPP-EC-20 Sustain and enhance arts and cultural institutions to foster an active and vibrant community life in every part of the region. |</p>
<table>
<thead>
<tr>
<th>EC-13</th>
<th>EC-13</th>
<th><strong>Address the historic disparity</strong></th>
<th><strong>Eliminate and correct for historical and ongoing disparities</strong> in income, and employment, and wealth building opportunities for economically disadvantaged populations, including minorities and women by committing resources to human services; community development; housing; economic development; and public infrastructure. Women, Black, Indigenous, and other people of color. Steer investments to community and economic development initiatives that elevate economic opportunity for those communities most marginalized and impacted by disinvestment and economic disruptions.</th>
</tr>
</thead>
<tbody>
<tr>
<td>MPP-EC-12</td>
<td><strong>Identify potential physical, economic, and cultural displacement of existing businesses that may result from redevelopment and market pressure. Use a range of strategies to mitigate displacement impacts to the extent feasible.</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>MPP-EC-13</td>
<td><strong>Address unique obstacles and special needs</strong>—as well as recognize the special assets—of disadvantaged populations in improving the region’s shared economic future. Promote equity and access to opportunity in economic development policies and programs. Expand employment opportunity to improve the region’s shared economic future.</td>
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<tr>
<td>MPP-EC-14</td>
<td><strong>Foster appropriate and targeted economic growth in distressed areas with low and very low access to opportunity to improve access to create economic opportunity for current and future residents of these areas.</strong></td>
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</tr>
<tr>
<td>MPP-EC-15</td>
<td><strong>Support and recognize the contributions of the region’s culturally and ethnically diverse communities and Native Tribes, including in helping the region continue to expand its international economy.</strong></td>
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</tbody>
</table>

**Places**

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<thead>
<tr>
<th>EC-14</th>
<th>EC-14</th>
<th><strong>Foster economic and employment growth in designated Urban, Regional, Countywide, and Local Centers and Manufacturing/Industrial Centers through local investments, planning, and financial policies.</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>MPP-EC-21</td>
<td><strong>Concentrate a significant amount of economic growth in designated centers and connect them to each other in order to strengthen the region’s economy and communities and to promote economic opportunity.</strong></td>
<td></td>
</tr>
<tr>
<td>MPP-EC-22</td>
<td><strong>Maximize the use of existing designated manufacturing/industrial centers by focusing appropriate types and amounts of employment growth in these areas and by protecting them from incompatible adjacent uses.</strong></td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>EC-15</th>
<th>EC-15</th>
<th><strong>Make local investments to maintain and expand infrastructure and services that support local and regional economic development strategies. Focus investment where it encourages growth in designated centers and helps achieve employment targets.</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>MPP-EC-6</td>
<td><strong>Ensure the efficient flow of people, goods, services, and information in and through the region with infrastructure investments, particularly in and connecting designated centers, to meet the distinctive needs of the regional economy.</strong></td>
<td></td>
</tr>
<tr>
<td>EC-16</td>
<td>EC-16</td>
<td>Add to the vibrancy and sustainability of our communities and the health and well-being of all people through safe and convenient access to local services, neighborhood-oriented retail, purveyors of healthy food (e.g. grocery stores and farmers markets), and transportation choices.</td>
</tr>
<tr>
<td>EC-17</td>
<td>EC-17</td>
<td>Promote the natural environment as a key economic asset and work to improve access to it as an economic driver. Work cooperatively with local businesses to protect and restore the natural environment in a manner that is equitable, efficient, predictable and minimizes impacts on businesses. Complements economic prosperity. Encourage private, public, and non-profit sectors to incorporate environmental stewardship and social responsibility into their practices. Encourage development of established and emerging industries, technologies and services that promote environmental sustainability, especially those addressing climate change and resilience.</td>
</tr>
<tr>
<td>EC-18</td>
<td>EC-18</td>
<td>Maintain an adequate supply of land within the Urban Growth Area to support economic development. Inventory, plan for, and monitor the land supply and development capacity for, manufacturing/industrial, commercial and other employment uses that can accommodate the amount and types of economic activity anticipated during the planning period.</td>
</tr>
<tr>
<td>EC-19</td>
<td>EC-19</td>
<td>Support Manufacturing/Industrial Centers by adopting industrial siting with land use policies that limit the loss of protect industrial land, retain and expand industrial lands, maintain the region's economic diversity, and employment, support family-wage jobs a diverse regional economy, and provide for the evolution of these Centers to reflect industrial business trends, including in technology and automation. Prohibit or strictly limit non-supporting or incompatible activities that may interfere with the retention or operation of industrial businesses, especially in Manufacturing/Industrial Centers, while recognizing that a wider mix of uses, in targeted areas and circumstances, may be appropriate when designed to be supportive of and compatible with industrial employment.</td>
</tr>
<tr>
<td>EC-20</td>
<td>EC-20</td>
<td>Facilitate redevelopment of contaminated sites through local, county and state financing and other strategies that assist with funding environmental remediation.</td>
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<tr>
<td>EC-21</td>
<td>EC-21</td>
<td>Encourage economic activity within Rural Cities that does not create adverse impacts to the surrounding Rural Area and Resource Lands and will not create the need to provide urban services and facilities to those areas.</td>
</tr>
<tr>
<td></td>
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<td>“The legislature finds that this chapter is intended to recognize the importance of rural lands and rural character to Washington’s economy, its people, and its environment, while respecting regional differences. Rural lands and rural-based economies enhance the economic desirability of the state, help to preserve traditional economic activities, and contribute to the state’s overall quality of life. . . . (T)he legislature finds that in defining its rural element under RCW 36.70A.070(5), a county should foster land use patterns and develop a local vision of rural character that will: Help preserve rural-based economies and traditional rural lifestyles; encourage the economic prosperity of rural residents; foster opportunities for small-scale, rural-based employment and self-employment; permit the operation of rural-based agricultural, commercial, recreational, and tourist businesses that are consistent with existing and planned land use patterns; be compatible with the use of the land by wildlife and for fish and wildlife habitat; foster the private stewardship of the land and preservation of open space; and enhance the rural sense of community and quality of life.”</td>
</tr>
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</table>

**MPP-EC-19** Recognize the need for employment. Support economic activity and job creation in cities in the rural areas at a size, scale, and type compatible with these communities, and promote compatible occupations (such as, but not limited to, tourism, cottage and home-based businesses, and local services) that do not conflict with rural character and resource-based land uses.

**MPP-EC-23** Support economic activity in rural and natural resource areas at a size and scale that is compatible with the long-term integrity and productivity of these lands.
<table>
<thead>
<tr>
<th>EC-22 (proposed numbering)</th>
<th>New Policy</th>
<th>Encourage commercial and mixed use development that provide a range of job opportunities throughout the region to create a much closer balance and match between the location of jobs and housing.</th>
<th>MPP-EC-18 Use incentives and investments to create a closer balance between jobs and housing, consistent with the regional growth strategy. Develop and provide a range of job opportunities throughout the region to create a much closer balance and match between jobs and housing.</th>
</tr>
</thead>
<tbody>
<tr>
<td>EC-23 (proposed numbering)</td>
<td>New Policy</td>
<td>Develop and implement systems that provide a financial safety net during economic downturns and recovery, and direct resources in ways that reduce inequities and build economic resiliency for those communities most negatively impacted by asset poverty.</td>
<td>Note: COVID-informed new equity policy suggestion.</td>
</tr>
<tr>
<td>EC-24 (proposed numbering)</td>
<td>New Policy</td>
<td>Ensure public investment decisions protect culturally significant economic assets and advance the business interests of immigrants, and Black, Indigenous, and other communities of color.</td>
<td>Note: New policy related to equity.</td>
</tr>
<tr>
<td>EC-25 (proposed numbering)</td>
<td>New Policy</td>
<td>Stabilize and prevent economic displacement of small, culturally relevant businesses and business clusters during periods of growth, contractions, and redevelopment. Track and respond to key indicators of displacement and mitigate risks through data collection, analyses, and adaptive responses.</td>
<td>MPP-EC-12 Identify potential physical, economic, and cultural displacement of existing businesses that may result from redevelopment and market pressure. Use a range of strategies to mitigate displacement impacts to the extent feasible. Note: New policy related to equity.</td>
</tr>
</tbody>
</table>

**Transportation**

**Supporting Growth**
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<thead>
<tr>
<th></th>
<th></th>
<th>Work cooperatively with the Puget Sound Regional Council, the state, and other relevant agencies to finance and develop an equitable and sustainable multi-modal transportation system that enhances regional mobility and reinforces the countywide vision for managing growth. Use VISION 20402050, the Regional Transportation 2040 Plan, and the Regional Growth Strategy as the policy and funding framework for creating a system of Urban Centers and Manufacturing/Industrial Centers linked by a multimodal network including high-capacity transit, frequent bus transit and an interconnected system of roadways, freeways and high-occupancy vehicle lanes.</th>
<th>MPP-T-7 Fund, complete, and operate the highly efficient, multimodal system in the Regional Transportation Plan to support the Regional Growth Strategy. Coordinate WSDOT, regional, and local transportation agencies, in collaboration with the state legislature, to build the multimodal system. Coordinate state, regional, and local planning efforts for transportation through the Puget Sound Regional Council to develop and operate a highly efficient, multimodal system that supports the Regional Growth Strategy.</th>
</tr>
</thead>
<tbody>
<tr>
<td>T-1</td>
<td>T-1</td>
<td>Avoid construction of major roads and capacity expansion on existing roads in the Rural Area and Resource Lands. Where increased roadway capacity is warranted to support safe and efficient travel through the Rural Area, appropriate rural development regulations and effective access management should be in place prior to authorizing such capacity expansion in order to make more efficient use of existing roadway capacity and prevent unplanned growth in the Rural Area. Consistent with policies PF-1 and PF-X1 and the principle of concurrency in transportation planning at a regional level, coordinate the rate of future growth in small suburban cities to be concurrent with the provision of adequate capacity on state highways to serve the city-to-city traffic flows that follow.</td>
<td>MPP-T-22 Avoid construction of major roads and capacity expansion on existing roads in rural and resource areas. Where increased roadway capacity is warranted to support safe and efficient travel through rural areas, appropriate rural development regulations and strong commitments to access management should be in place prior to authorizing such capacity expansion in order to prevent unplanned growth in rural areas. This policy continues to fail to protect the Rural Area from the effects of urban development in adjacent small cities, hence our rewrite. There is no “warrant” for road capacity expansion to serve city-to-city travel growth that cannot be satisfied entirely on state highways. That is the primary function of State highways. There is no reason to provide for special development regulations in the Rural Area, if there is no warrant to satisfy.</td>
</tr>
<tr>
<td>T-2</td>
<td>T-2</td>
<td>Increase the share of trips made countywide by modes other than driving alone through coordinated land use planning, public and private investment, and programs focused on centers and connecting corridors, consistent with locally adopted mode split goals.</td>
<td>MPP-T-13 Increase the proportion of trips made by transportation modes that are alternatives to driving alone, especially to and within centers and along corridors connecting centers, by ensuring availability of reliable and competitive transit options.</td>
</tr>
<tr>
<td>T-3</td>
<td>T-3</td>
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<tr>
<td>T-X1 (temporary numbering)</td>
<td>New Policy</td>
<td>Reduce the need for new capacity roadway improvements through investments in transportation system management and operations, pricing programs, and transportation demand management strategies that improve the efficiency of the current system.</td>
<td>MPP-T-3 Reduce the need for new capital improvements through investments in operations, pricing programs, demand management strategies, and system management activities that improve the efficiency of the current system.</td>
</tr>
<tr>
<td>T-X2 (temporary numbering)</td>
<td>New Policy</td>
<td>Prioritize transportation investments that provide and encourage alternatives to single-occupancy vehicle travel and increase travel options, especially to and within centers and along corridors connecting centers.</td>
<td>MPP-T-12 Emphasize transportation investments that provide and encourage alternatives to single-occupancy vehicle travel and increase travel options, especially to and within centers and along corridors connecting centers.</td>
</tr>
<tr>
<td>T-4</td>
<td>T-4</td>
<td>Develop station area plans for high capacity transit stations and transit-mobility hubs based on community engagement processes. Plans should reflect the unique characteristics, local vision for each station area including transit supportive land uses, transit rights-of-way, stations and related facilities, multi-modal linkages, safety improvements, place-making elements and minimize displacement.</td>
<td>MPP-T-19 Apply urban design principles Design in transportation programs and projects for to support local and regional growth centers and high-capacity transit station areas.</td>
</tr>
<tr>
<td>T-5</td>
<td>T-5</td>
<td>Support countywide growth management and climate objectives by prioritizing transit service to areas where existing housing and employment densities support transit ridership and to Urban Centers and other areas planned for housing and employment densities that will support transit ridership. Address the mobility needs of transit dependent populations in allocating transit service and provide at least a basic level of service throughout the Urban Growth Area. To support climate objectives, additionally emphasize increased transit service in corridors where commute trip lengths are long and the environmental benefits of removing commute trips are high.</td>
<td>MPP-T-15 Prioritize investments in transportation facilities and services in the urban growth area that support compact, pedestrian- and transit-oriented densities and development. MPP-T-18 Promote coordination among transportation providers and local governments to ensure that joint- and mixed-use developments are designed in a way that improves overall mobility and accessibility to and within such development.</td>
</tr>
<tr>
<td>T-X3  (temporary numbering)</td>
<td>New Policy</td>
<td>Provide transit and mobility services where they are needed most and address the needs of black, indigenous, and people of color, people with low and no-income, and people with special transportation needs. Provide the appropriate service level to support the land uses in Urban Growth Areas.</td>
<td>MPP-T-10 Ensure mobility choices for people with special transportation needs, including persons with disabilities, seniors, the elderly, youth the young, and people with low-incomes populations.</td>
</tr>
<tr>
<td>T-X4  (temporary numbering)</td>
<td>New Policy</td>
<td>Implement transportation programs and projects that promote access to opportunity for Black, Indigenous, and people of color, people with low and no-incomes, and people with special transportation needs.</td>
<td>MPP-T-9 Implement transportation programs and projects that provide access to opportunities while preventing or mitigating in ways that prevent or minimize negative impacts to people of color, people with low-income, minority, and people with special transportation needs populations.</td>
</tr>
<tr>
<td>T-X5  (temporary numbering)</td>
<td>New Policy</td>
<td>Implement transportation programs and projects that prevent and mitigate the displacement of Black, Indigenous, and people of color, people with low and no-incomes, and people with special transportation needs, and prevent the disturbance of the Rural Area by traffic generated in small cities.</td>
<td>MPP-T-9 Implement transportation programs and projects that provide access to opportunities while preventing or mitigating in ways that prevent or minimize negative impacts to people of color, people with low-income, minority, and people with special transportation needs populations.</td>
</tr>
<tr>
<td>T-6</td>
<td>T-6</td>
<td>Encourage transit ridership by integrating transit facilities and services as well as non-motorized infrastructure so that they are integrated with public spaces and private developments to create a safe and inviting waiting and transfer environments and encourage transit ridership countywide public realm.</td>
<td>MPP-T-15 Prioritize investments in transportation facilities and services in the urban growth area that support compact, pedestrian- and transit-oriented densities and development.</td>
</tr>
<tr>
<td>T-7</td>
<td>T-7</td>
<td>Ensure Advocate for policies and actions in state and capital improvement policies and actions programs that promote equity and sustainability, that are consistent with the Regional Growth Strategy, and support VISION 20402050, and the Countywide Planning Policies.</td>
<td>MPP-T-8 Strategically expand capacity and increase efficiency of the transportation system to move goods, services, and people consistent with the Regional Growth Strategy, to and within the urban growth area. Focus on investments that produce the greatest net benefits to people and minimize the environmental impacts of transportation.</td>
</tr>
<tr>
<td>T-8</td>
<td>T-8</td>
<td>Prioritize state, regional and local funding to transportation investments that support adopted countywide growth targets and are focused on multi-modal mobility and safety, equity, and climate change goals, as well as centers (local, countywide and regional) where applicable. <strong>NEW POLICY T-8X</strong> Provide maximal support to climate change goals as well as better serve growth management purposes by replacing all existing impact mitigation and concurrency management standards and regulations with a new system based on vehicle-miles-of-travel (VMT) as the common basis for measurement of development impacts, mitigation, and multi-modal system capacity.</td>
<td><strong>MPP-T-8</strong> Strategically expand capacity and increase efficiency of the transportation system to move goods, services, and people consistent with the Regional Growth Strategy to and within the urban growth area. Focus on investments that produce the greatest net benefits to people and minimize the environmental impacts of transportation. Climate change is too important to merely salute with words and move on. Now is the time to replace a broken system with a better systematic approach similar to what the State of California has already done in its latest Environmental Quality Act.</td>
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**Mobility**

<p>| T-X6 (temporary numbering) | New Policy | Advocate for and pursue new, innovative, sustainable, and progressive transportation funding methods including user fees, tolls, and other pricing mechanisms, that reduce the volatility of transit funding and funds the maintenance, improvement, preservation and operation of the transportation system. | <strong>MPP-RC-11</strong> Explore new and existing sources of funding for services and infrastructure, recognizing that such funding is vital if local governments are to achieve the regional vision. <strong>MPP-RC-12</strong> Support local and regional efforts to develop state legislation to provide new fiscal tools to support local and regional planning and to support infrastructure improvements and services. <strong>T-Action-1</strong> – Support for Regional Transportation Plan that is consistent with VISION 2050. <strong>T-Action-2 Funding:</strong> PSRC, together with its member jurisdictions, will advocate for new funding tools to address the gap in local funding identified in the Regional Transportation Plan. |</p>
<table>
<thead>
<tr>
<th>T-9</th>
<th>T-9</th>
<th>Promote the mobility of people and goods through a multi-modal transportation system based on regional priorities consistent with VISION 2040-2050 and local comprehensive plans with enforcement of continuity and consistency of plans among adjacent jurisdictions as required by GMA. Require consistency of city and county plans for routes connecting both areas.</th>
</tr>
</thead>
<tbody>
<tr>
<td>T-X7</td>
<td>New Policy</td>
<td>Determine if capacity needs can be met from investments in transportation system operations and management, pricing programs, transportation demand management, public transportation and system management activities that improve the efficiency of the current transportation system, prior to implementing major roadway capacity expansion projects. Focus on investments that produce the greatest net benefits to people, especially communities and individuals where needs are greatest, and goods movement that minimize the environmental impacts of transportation.</td>
</tr>
<tr>
<td>T-10</td>
<td>T-10</td>
<td>Support effective management, maintenance, and preservation of existing air, marine and rail transportation capacity and infrastructure to address current and future capacity needs in cooperation with responsible agencies, affected communities, and users.</td>
</tr>
<tr>
<td>T-X8</td>
<td>New Policy</td>
<td>Promote coordination planning and effective management to optimize the movement of people and goods in the region's aviation system in a manner that minimizes health, air quality, and noise impact to the community, especially frontline communities. Consider demand management alternatives as future aviation growth needs are analyzed, recognizing capacity constraints at existing facilities and the time and resources necessary to build new ones.</td>
</tr>
<tr>
<td>MPP-T-1</td>
<td>Maintain and operate transportation systems to provide safe, efficient, and reliable movement of people, goods, and services.</td>
<td></td>
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<tr>
<td>MPP-T-3</td>
<td>Reduce the need for new capital improvements through investments in operations, pricing programs, demand management strategies, and system management activities that improve the efficiency of the current system.</td>
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<tr>
<td>MPP-T-8</td>
<td>Strategically expand capacity and increase efficiency of the transportation system to move goods, services, and people consistent with the Regional Growth Strategy to and within the urban growth area. Focus on investments that produce the greatest net benefits to people and minimize the environmental impacts of transportation.</td>
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</tr>
<tr>
<td>MPP-T-27</td>
<td>Coordinate regional planning with railroad line capacity expansion plans and support capacity expansion that is compatible with state, regional, and local plans.</td>
<td></td>
</tr>
<tr>
<td>MPP-T-28</td>
<td>Promote coordinated planning and effective management to optimize the region's aviation system in a manner that minimizes health, air quality, and noise impacts to communities, including historically marginalized communities. Consider demand management alternatives as future growth needs are analyzed, recognizing capacity constraints at existing facilities and the time and resources necessary to build new ones. Support the ongoing process of development of a new commercial aviation facility in Washington State. Support effective management of existing air transportation capacity and ensure that future capacity needs are addressed in cooperation with responsible agencies, affected communities, and users.</td>
<td></td>
</tr>
<tr>
<td>T-11</td>
<td>T-11</td>
<td>Develop and implement freight mobility strategies that strengthen, <em>preserve</em>, and protect King County’s role as a major regional freight distribution hub, an international trade gateway, and a manufacturing area. <em>Minimize community impacts.</em></td>
</tr>
<tr>
<td>MPP-T-14</td>
<td>Integrate transportation systems to make it easy for people and freight to move from one mode or technology to another.</td>
<td></td>
</tr>
<tr>
<td>MPP-T-24</td>
<td>Improve key facilities connecting the region to national and world markets to support the economic vitality of the region.</td>
<td></td>
</tr>
<tr>
<td>MPP-T-25</td>
<td>Ensure the freight system supports the growing needs of global trade and state, regional and local distribution of goods and services, meets the needs of: (1) global gateways, (2) producer needs within the state and region, and (3) regional and local distribution.</td>
<td></td>
</tr>
<tr>
<td>T-12</td>
<td>T-12</td>
<td>Address the needs of non-driving populations—people who do not drive, either by choice or circumstances (e.g. elderly, teens, low income, and persons with disabilities)—in the development and management of local and regional transportation systems.</td>
</tr>
<tr>
<td>MPP-T-1</td>
<td>Maintain and operate transportation systems to provide safe, efficient, and reliable movement of people, goods, and services.</td>
<td></td>
</tr>
<tr>
<td>T-13</td>
<td>T-13</td>
<td>Site—Consider mobility options, connectivity, active transportation access, and safety in the siting and design of transit stations and transit-mobility hubs, to promote connectivity and access for pedestrian and bicycle patrons especially those that are serviced by high-capacity transit.</td>
</tr>
<tr>
<td>MPP-T-23</td>
<td>Make transportation investments that improve economic and living conditions so that industries and skilled workers continue to be retained and attracted to the region.</td>
<td></td>
</tr>
<tr>
<td>T-X9 (temporary numbering)</td>
<td>New Policy</td>
<td>Invest in transportation to improve economic and living conditions so that industries and workers are retained and attracted to the region, and to improve quality of life for all workers.</td>
</tr>
<tr>
<td>MPP-T-34</td>
<td>Be responsive to changes in mobility patterns and needs for both people and goods, and encourage partnerships with the private sector, where applicable. Encourage public and private sector partnerships to identify and implement improvements to personal mobility and freight movement.</td>
<td></td>
</tr>
<tr>
<td>T-X10 (temporary numbering)</td>
<td>New Policy</td>
<td>Respond to changes in mobility patterns and needs for both people and goods, encouraging partnerships with nonprofit providers and the private sector where applicable.</td>
</tr>
</tbody>
</table>

**System Operations**
<table>
<thead>
<tr>
<th>T-14</th>
<th>T-14</th>
<th>Prioritize essential maintenance, preservation, and safety improvements of the existing transportation system to protect mobility, extend useful life of assets, and avoid more costly replacement projects.</th>
<th><strong>MPP-T-2</strong> Protect the investment in the existing system and lower overall life-cycle costs through effective maintenance and preservation programs.</th>
</tr>
</thead>
<tbody>
<tr>
<td>T-15</td>
<td>T-15</td>
<td>Design and operate transportation facilities in a manner that is compatible with and integrated into the natural and built environments in which they are located. Incorporate features such as natural drainage, native plantings, and local design themes that facilitate integration and compatibility.</td>
<td><strong>MPP-T-21</strong> Design transportation facilities to fit within the context of the built or natural environments in which they are located.</td>
</tr>
<tr>
<td>T-X11</td>
<td>New Policy</td>
<td>Reduce stormwater pollution from transportation facilities and improve fish passage through retrofits and updated designs standards. When feasible, integrate with other improvements to achieve multiple benefits and cost efficiencies.</td>
<td><strong>MPP-T-32</strong> Reduce stormwater pollution from transportation facilities and improve fish passage, through retrofits and updated design standards. Where feasible, integrate with other improvements to achieve multiple benefits and cost efficiencies.</td>
</tr>
<tr>
<td>T-16</td>
<td>T-16</td>
<td>Protect the development of a resilient transportation system (e.g. roadway, rail, transit, nonmotorized, air, and marine) and protect against major disruptions by developing and climate change impacts. Develop prevention, adaptation, mitigation, and recovery strategies and by coordinating disaster response plans.</td>
<td><strong>MPP-T-31</strong> Advance the resilience of the transportation system by incorporating redundancies, preparing for disasters and other impacts, and coordinated planning for system recovery. Protect the transportation system against disaster, develop prevention and recovery strategies, and plan for coordinated responses.</td>
</tr>
<tr>
<td>T-17</td>
<td>T-17</td>
<td>Promote the use of telling and other pricing strategies and transportation system management and operations tools to effectively manage the transportation system and provide an equitable, stable, and sustainable transportation funding source and to improve mobility.</td>
<td><strong>MPP-T-3</strong> Reduce the need for new capital improvements through investments in operations, pricing programs, demand management strategies, and system management activities that improve the efficiency of the current system.</td>
</tr>
</tbody>
</table>

*Add: MPP-T-6 — “Pursue alternative transportation financing methods, such as user fees, tolls, and other pricing mechanisms to manage and fund the maintenance, improvement, preservation, and operation of the transportation system.”*
<table>
<thead>
<tr>
<th>T-X12 (temporary numbering)</th>
<th>New Policy</th>
<th>T-17 Promote and incorporate bicycle and pedestrian travel as important modes of transportation by providing facilities and navigable reliable connections.</th>
</tr>
</thead>
<tbody>
<tr>
<td>New Policy</td>
<td></td>
<td>Nonmotorized mobility and safety should not be sacrificed on the altar of convenience to budget managers. WSDOT Complete Streets reference: <a href="https://wsdot.wa.gov/LocalPrograms/ATP/CompleteStreets.htm">https://wsdot.wa.gov/LocalPrograms/ATP/CompleteStreets.htm</a></td>
</tr>
<tr>
<td>T-19</td>
<td>Design roads and streets, including retrofit projects, to accommodate a range of motorized and non-motorized travel modes within the travel corridor in order to reduce injuries and fatalities, contribute to achieving the state goal of zero deaths and serious injuries, and to encourage non-motorized travel. The design should include well-defined, safe and appealing spaces for pedestrians and bicyclists.</td>
<td>MPP-T-11 Design, construct, and operate a safe and convenient transportation system for all users transportation facilities to serve all users safely and conveniently, including motorists, pedestrians, bicyclists, and transit users, while accommodating the movement of freight and goods, using best practices and context sensitive design strategies as suitable to each facility's function and context as determined by the appropriate jurisdictions.</td>
</tr>
<tr>
<td>T-20</td>
<td>Develop a transportation system that minimizes negative health and environmental impacts to human health, including exposure to environmental toxins generated by vehicle emissions. All communities, especially Black, indigenous, and other communities of color and low-income communities, that have been disproportionately affected by transportation decisions.</td>
<td>MPP-T-5 Develop a transportation system that minimizes negative impacts to, and promotes, human health.</td>
</tr>
<tr>
<td>T-21</td>
<td>Provide equitable opportunities for an active, healthy lifestyle by integrating the needs of pedestrians and bicyclists in the local transit, countywide, and regional transportation plans and systems, and provide for safety of equestrian travel in rural areas.</td>
<td>MPP-T-16 Improve local street patterns — including their design and how they are used — for walking, bicycling, and transit use to enhance communities, connectivity, and physical activity. Equestrians receive attention in King County Parks plans, but the interface with public roads also needs attention in certain locations.</td>
</tr>
<tr>
<td>T-22</td>
<td>Plan and develop a countywide transportation system that supports the connection between land use and transportation, and essential travel that reduces greenhouse gas emissions by advancing strategies that shorten trip length or replace vehicle trips to decrease reduce vehicle miles traveled, including financial strategies to charge road users appropriately for vehicle-miles of usage.</td>
<td>MPP-T-5 Develop a transportation system that minimizes negative impacts to, and promotes, human health.</td>
</tr>
</tbody>
</table>
T-23
Apply technologies, programs, and other strategies (e.g. intelligent transportation systems (ITS), first and last mile connections) where needed to optimize the use of existing infrastructure and support equity in order to improve mobility, reduce congestion and vehicle miles traveled, increase energy-efficiency, reduce greenhouse-gas emissions, and reduce the need for new infrastructure.

MPP-T-30 Provide infrastructure sufficient to support widespread electrification of the transportation system.
MPP-T-33 Prepare for changes in transportation technologies and mobility patterns, to support communities with a sustainable and efficient transportation system. Seek the development and implementation of transportation modes and technologies that are energy-efficient and improve system performance.

T-24
Promote the expanded use of alternative fuel (e.g. electric) and zero emission vehicles by the general public with measures such as converting transit and public and private fleets, applying incentive programs, and providing for electric vehicle charging stations throughout the Urban Growth Area.

MPP-T-29 Support the transition to a cleaner transportation system through investments in zero emission vehicles, low carbon fuels and other clean energy options. Foster a less polluting system that reduces the negative effects of transportation infrastructure and operation on the climate and natural environment.

N/A
Develop a countywide monitoring system to determine how transportation investments are performing over time consistent with Transportation 2040 recommendations.

Note: Redundant policy removed.
Monitoring still is needed to prevent increased urban intercity travel on Rural Area roads.

Public Facilities and Services

Urban & Rural Levels of Service

PF-1
Provide a full range of urban services in the Urban Growth Area to support the Regional Growth Strategy and adopted growth targets and limit the availability of urban services in the Rural Area consistent with VISION 2040/2050. Protect rural areas from encroachments from urban areas as required by GMA and consistent with principles of environmental or social justice.

MPP-PS-3 Time and phase services and facilities to guide growth and development in a manner that supports the Regional Growth Strategy vision.
MPP-PS-5 Do not provide urban services in rural areas. Design services for limited access when they are needed to solve isolated health and sanitation problems, so as not to increase the development potential of the surrounding rural area.
MPP-PS-6 Encourage the design of public facilities and utilities in rural areas to be at a size and scale appropriate to rural locations, so as not to increase development pressure.

Collaboration Among Jurisdictions
<table>
<thead>
<tr>
<th>PF-X1 (temporary numbering)</th>
<th>New Policy</th>
<th>Provide affordable and equitable access to public services to all communities, especially the historically underserved. Prioritize investments to address disparities.</th>
</tr>
</thead>
<tbody>
<tr>
<td>PF-2</td>
<td>PF-2</td>
<td>Coordinate among jurisdictions and service providers to provide reliable and cost-effective services to the public through coordination among jurisdictions and service providers.</td>
</tr>
<tr>
<td>PF-3</td>
<td>PF-3</td>
<td>Cities are the appropriate providers of services to the Urban Growth Area, either directly or by contract. Extend urban services through the use of special districts only where there are agreements with the city in whose Potential Annexation Area the extension is proposed. Within the Urban Growth Area, as time and conditions warrant, cities will assume local urban services provided by special service districts.</td>
</tr>
</tbody>
</table>

### Utilities

#### Water Supply

<table>
<thead>
<tr>
<th>PF-4</th>
<th>PF-4</th>
<th>Develop plans for long-term water provision to support growth and to address the potential impacts of climate change and fisheries protection on regional water resources.</th>
</tr>
</thead>
</table>

**MPP-PS-2** Promote affordability and equitable access of public services to all communities, especially the historically underserved. Prioritize investments to address disparities.

*Note: Affordable and equitable provisions added*

**MPP-PS-1** Protect and enhance the environment and public health and safety when providing services and facilities.

**MPP-PS-7** Obtain urban services from cities or appropriate regional service providers, and encourage special service districts, including sewer, water, and fire districts, to consolidate or dissolve as a result. Encourage cities, counties, and special service districts, including sewer, water, and fire districts, to coordinate planning efforts, agree on optimal ways to provide efficient service, and support consolidations that would improve service to the public.

**MPP-PS-3** Time and phase services and facilities to guide growth and development in a manner that supports the Regional Growth Strategy vision.

**MPP-PS-17** Coordinate, design, and plan for public safety services and programs, including emergency management. These efforts may be interjurisdictional.

**MPP-PS-21** Identify and develop additional water supply sources to meet the region's long-term water needs, recognizing the potential impacts of climate change and fisheries protection on the region's water supply.

**MPP-PS-25** Protect the source of the water supply to meet the needs for both human consumption and for environmental balance.
| PF-5 | Support efforts to ensure all consumers and residents have access to a safe, reliably maintained, and sustainable drinking water source that meets present and future needs. | **MPP-PS-22** Provide residents of the region with access to high quality drinking water that meets or is better than federal and state requirements. |
| PF-6 | Coordinate water supply among local jurisdictions, tribal governments, and water purveyors to provide reliable and cost-effective sources of water for all users and needs, including for residents, businesses, fire districts, and aquatic species. | **MPP-PS-23** Promote coordination among local and tribal governments and water providers and suppliers to meet long-term water needs in the region in a manner that supports the region’s growth strategy. |
| PF-7 | Plan and locate water systems in the Rural Area that are appropriately sized for rural uses and densities and that do not increase the development potential of the Rural Area. Permitting for development in areas adjacent to Rural Area water sources (i.e., wells and/or springs) or systems must recognize potential impacts and provide protection against such actions that can cause loss of use due to lowered quantity or quality. | **MPP-PS-5** Do not provide urban services in rural areas. Design services for limited access when they are needed to solve isolated health and sanitation problems, so as not to increase the development potential of the surrounding rural area. |
| PF-8 | Recognize and support agreements with water purveyors in adjacent cities and counties to promote effective conveyance of water supplies and to secure adequate supplies for emergencies. |  |
| PF-9 | Implement water conservation and efficiency efforts to protect natural resources, reduce environmental impacts, and support a sustainable long-term water supply to serve the growing population. | **MPP-PS-4** Promote demand management and the conservation of services and facilities prior to developing new facilities. **MPP-PS-24** Reduce the per capita rate of water consumption through conservation, efficiency, reclamation, and reuse. |
| PF-10 | Encourage water reuse and reclamation, where feasible, especially for high-volume non-potable water users such as parks, schools, and golf courses. | **MPP-PS-9** Promote improved conservation and more efficient use of water, as well as the increased use of reclaimed water, to reduce wastewater generation and ensure water availability. |

**Note:** Strengthens the language, while still acknowledging reuse and reclamation may not be feasible everywhere.

**Sewage Treatment and Disposal**
| PF-11 | PF-11 | Require all development in the Urban Growth Area to be served by a public sewer system except:  
\[a\)] single-family residences on existing individual lots that have no feasible access to sewers may utilize individual septic systems on an interim basis; or  
\[b\)] development served by alternative technology other than septic systems that:  
* provide equivalent performance to sewers;  
* provide the capacity to achieve planned densities; and  
* will not create a barrier to the extension of sewer service within the Urban Growth Area. | **MPP-PS-10** Serve new development within the urban growth area with sanitary sewer systems or fit it with dry sewers in anticipation of connection to the sewer system. Alternative technology to sewers should be considered only when it can be shown to produce treatment at standards that are equal to or better than the sewer system and where a long-term maintenance plan is in place.  

**MPP-PS-11** Replace failing septic systems within the urban growth area with sanitary sewers or alternative technology that is comparable or better.  

**MPP-PS-12** Use innovative and state-of-the-art design and techniques when replacing septic tanks to restore and improve environmental quality. |
| PF-12 | PF-12 | Prohibit sewer service in the Rural Area and on Resource Lands except:  
\[a\)] where needed to address specific health and safety problems threatening existing structures; or  
\[b\)] as allowed by Countywide Planning Policy DP-47; or  
\[c\)] as provided in Appendix 5 of the (March 31, 2012 School Siting Task Force Report).  
Sewer service authorized consistent with the policy shall be provided in a manner that does not increase development potential in the Rural Area. | **MPP-PS-5** Do not provide urban services in rural areas. Design services for limited access when they are needed to solve isolated health and sanitation problems, so as not to increase the development potential of the surrounding rural area. |
| **Solid Waste** | | **PF-13** | PF-13 | Reduce the solid waste stream and encourage reuse and recycling. Develop a plan and shall close all municipal landfills within the County by 20xx and to process or transport the waste stream going forward in an environmentally sustainable manner that protects the health and safety of all residents. | **MPP-PS-4** Promote demand management and the conservation of services and facilities prior to developing new facilities.  

**MPP-PS-8** Develop conservation measures to reduce solid waste and increase recycling. |
| **Energy** | |
| PF-14 | PF-14 | Reduce the rate of energy consumption through efficiency and conservation as a means to lower energy costs and mitigate environmental impacts associated with traditional energy supplies. | **MPP-PS-4** Promote demand management and the conservation of services and facilities prior to developing new facilities.  
**MPP-PS-14** Reduce the rate of energy consumption through conservation and alternative energy forms to extend the life of existing facilities and infrastructure. |
| PF-15 | PF-15 | **Invest in, and promote the use of, low-carbon, renewable, and alternative energy resources to help meet the county’s long-term energy needs, reduce environmental impacts associated with traditional energy supplies, and increase community sustainability.** | **MPP-PS-13** Promote the use of renewable energy resources to meet the region’s energy needs.  
**MPP-PS-15** Support the necessary investments in utility infrastructure to facilitate moving to low-carbon energy sources. |

**Telecommunications**

| PF-16 | PF-16 | **Plan for the equitable provision of telecommunication infrastructure to serve growth and development in a manner consistent with the regional and countywide vision and affordable, convenient, and reliable broadband internet access to businesses, and to households of all income levels, with a focus on underserved areas.** | **MPP-PS-16** Plan for the provision of telecommunication infrastructure to provide access to residents and businesses in all communities, especially underserved areas, serve growth and development in a manner that is consistent with the regional vision and friendly to the environment.  
*Note: Adding in additional policy for equity in access to internet (as existing policy is focused on telecommunication infrastructure for growth and development).* |

**Human and Community Services**

| PF-17 | PF-17 | Provide human and community services to meet the needs of current and future residents in King County communities through coordinated planning, funding, and delivery of services by the county, cities, and other agencies. | **MPP-PS-18** Locate community facilities and health and human services in centers and near transit facilities for all to access services conveniently. Encourage health and human services facilities to locate near centers and transit for efficient accessibility to service delivery. |

**Locating Facilities and Services**
<table>
<thead>
<tr>
<th>PF-18</th>
<th>PF-18</th>
<th>Locate schools, institutions, and other community facilities and services that primarily serve urban populations within the Urban Growth Area, where they are accessible to the communities they serve, except as provided in Appendix 5 of the (March 31, 2012 School Siting Task Force Report) and as provided specifically for in Pierce County by RCW 36.70A.211. Locate these facilities in places that are well served by transit and pedestrian and bicycle networks.</th>
</tr>
</thead>
<tbody>
<tr>
<td>PF-19</td>
<td>PF-19</td>
<td>Locate new schools and institutions primarily serving rural residents in neighboring cities and rural towns, except as provided in Appendix 5 of the (March 31, 2012 School Siting Task Force Report) and as provided specifically for in Pierce County by RCW 36.70A.211 and locate new community facilities and services that primarily serve rural residents in neighboring cities and rural towns, with the limited exceptions when their use is dependent upon a rural location and their size and scale supports rural character.</td>
</tr>
</tbody>
</table>

**MPP-PS-18** Locate community facilities and health and human services in centers and near transit facilities for all to access services conveniently. Encourage health and human services facilities to locate near centers and transit for efficient accessibility to service delivery.

**MPP-PS-27** Site schools, institutions, and other community facilities that primarily serve urban populations within the urban growth area in locations where they will promote the local desired growth plans, except as provided for by RCW 36.70A.211.

While we understand why the referenced RCW is included in the Multi-County Planning Policy (MPP), as it covers four counties, we question why the Pierce County exception is mentioned in the revised PF-18 policy?

**MPP-PS-6** Encourage the design of public facilities and utilities in rural areas to be at a size and scale appropriate to rural locations, so as not to increase development pressure.

**MPP-PS-28** Locate schools, institutions, and other community facilities serving rural residents in neighboring cities and towns and design these facilities in keeping with the size and scale of the local community, except as provided for by RCW 36.70A.211.

Again, why is Pierce County exception mentioned, in this case, in the revised PF-19 policy?
Plan, through a cooperative process between jurisdictions and school districts, that public school facilities are available, to meet the needs of existing and projected residential development consistent with adopted comprehensive plan policies and growth forecasts. Cooperatively work with each school district located within the jurisdiction’s boundaries to evaluate the school district’s ability to site school facilities necessary to meet the school district’s identified student capacity needs. Use school district capacity and enrollment data and the growth forecasts and development data of each jurisdiction located within the school district’s service boundaries.

Commencing in January 2016 and continuing every two years thereafter, each jurisdiction and the school district(s) serving the jurisdiction shall confer to share information and determine if there is development capacity and the supporting infrastructure to site the needed school facilities.

If not, cooperatively prepare a strategy to address the capacity shortfall. Potential strategies may include:

- Shared public facilities such as play fields, parking areas and access drives
- School acquisition or lease of appropriate public lands
- Regulatory changes such as allowing schools to locate in additional zones or revised development standards
- School design standards that reduce land requirements (such as multi-story structures or reduced footprint) while still meeting programmatic needs

In 2017, and every two years thereafter, King County shall report to the GMPC on whether the goals of this policy are being met. The GMPC shall identify corrective actions as necessary to implement this policy.

Several members of our Rural Areas Unincorporated Area Councils/Associations/Organizations served on the 2011/2012 School Siting Task Force. Although we have no problem with “cooperative” planning, we do not fully support this policy (specifically, the third bullet: “Regulatory changes such as allowing schools to locate in additional zones or revised development standards”), as new schools should not be located in the Rural Area. As such, we support Policy PF-19 above.

**MPP-PS-6** Encourage the design of public facilities and utilities in rural areas to be at a size and scale appropriate to rural locations, so as not to increase development pressure.

We recommend adding the following VISION 2050 policy:

**MPP-PS-5** Do not provide urban services in rural areas. Design services for limited access when they are needed to solve isolated health and sanitation problems, so as not to increase the development potential of the surrounding rural area.
<table>
<thead>
<tr>
<th>PF-20</th>
<th>PF-20</th>
<th>Site or expand public capital facilities of regional or statewide importance within the county in a way using a process that incorporates broad public involvement and equitably disperses impacts and benefits while supporting the Countywide Planning Policies. Do not locate regional capital facilities outside the urban growth area unless it is demonstrated that a non-urban site is the most appropriate location for such a facility.</th>
</tr>
</thead>
<tbody>
<tr>
<td>MPP-PS-29</td>
<td>Site or expand regional capital facilities in a manner that (1) reduces adverse social, environmental, and economic impacts on the host community, especially on historically marginalized communities, (2) equitably balances the location of new facilities away from disproportionately burdened communities, and (3) addresses regional planning objectives.</td>
<td></td>
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<tr>
<td>MPP-PS-30</td>
<td>Do not locate regional capital facilities outside the urban growth area unless it is demonstrated that a non-urban site is the most appropriate location for such a facility.</td>
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<tr>
<td>While our proposal to add MPP-PS-30 above was met, Policy PF-20 itself was not changed to add the sentence we originally proposed, so we resubmit it therein.</td>
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</tr>
<tr>
<td>Notes: Policy includes the concept that regional facilities can have impacts and benefits. (Only the negative impacts are reflected in MPP-PS-29.) Both are carried over into the proposed edit, along with the MPP concept of siting/expanding in consideration of historically marginalized communities that have been disproportionately burdened.</td>
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<tr>
<td>The proposed edit also considers that while equity (as a regional planning objective) will be considered when making siting/expansion decisions, there should also be consideration of the ground to be made up for the historically marginalized communities. (Adopted PF-20 looks at equitable dispersion of impacts and benefits of future siting/expansion decisions, without explicitly indicating that past decisions that may have resulted in inequities re: location will also be part of the picture.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>PF-X2 (tempor ary numbering)</td>
<td>New Policy</td>
<td>Consider climate change, economic, and health impacts when siting and building essential public services and facilities.</td>
</tr>
<tr>
<td>MPP-PS-20</td>
<td>Consider climate change, economic, and health impacts when siting and building essential public services and facilities. Note: New proposed Policy proposes adding a provision for a siting process for EPF that incorporates environmental justice and broad stakeholder involvement to ensure equitable distribution.</td>
<td></td>
</tr>
</tbody>
</table>

Public Facility and Disaster Preparedness
| PF-X3  
(temporary numbering) | New Policy | Plan for public safety services and programs, including emergency management, and support interjurisdictional coordination. | MPP-PS-17 Coordinate, design, and plan for public safety services and programs, including emergency management. These efforts may be interjurisdictional. |
|------------------------|------------|-------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| PF-X4  
(temporary numbering) | New Policy | Establish new or expanded sites for public facilities, utilities, and infrastructure in a manner that ensures disaster resiliency and public service recovery. | MPP-PS-19 Support efforts to increase the resilience of public services, utilities, and infrastructure by preparing for disasters and other impacts and coordinated planning for system recovery. |
King County Unincorporated Area Open House, Verbal Comments

April 28th, 2021

Comments:

- How has PSRC opportunity mapping been included in the CPPs and does the County have plans to conduct another opportunity analysis?

- Why are jobs targets in the Renton PAAs so much lower than in North Highline even though the Renton PAAs cover a much larger area?

- What is the capacity of the rural area?

- Why are we concentrating low-income housing in White Center?

- What is being done to lessen the burden of permitting costs that make it challenging to build affordable housing in rural East King County? Distance to accessible public transit also creates challenges to building affordable housing.

- Appreciation for policy that rural areas will not see addition of major roads and road capacity increases.

- If one of the goals of King County is to preserve urban tree canopy, then why were trees cut down across my street? (In White Center)

- Very pleased with mentions of holistic flood management in the CPPs, specifically EN-16

- There needs to be more natural hazard risk policies in the CPPs. These should be linked to resiliency.

- There should be a CPP for underground utilities to prepare to natural disasters.

- There should be a CPP for the waste to energy.

- How do interlocal agreements guide cities to annex areas that have more marijuana stores than are allowed in the City as a whole?

- How do the CPPs address the creation of impervious surfaces as they relate to redevelopment?
Dear Chair Constantine and members of the Council:

The Master Builders Association of King and Snohomish Counties (MBAKS) thanks you for the opportunity to comment on the 2021 update to the King County Countywide Planning Policies (CPPs). With nearly 2,600 members, MBAKS is the largest local homebuilders’ association in the United States, providing a range of housing choice and affordability. We aspire to be the most trusted and respected housing experts in the region.

MBAKS firmly supports the need for clear planning to ensure that we are addressing the housing affordability crisis. We appreciate the headway made with local jurisdictions to elevate housing as a priority. However, there is a clear and present need to strengthen specific policies in the CPPs to ensure local accountability.

Our region is facing a severe housing crisis, with critically low supply, lack of housing choices, and extremely high prices. This must be immediately addressed with policies, programs, planning, and funding that ensures sufficient and equitable housing production.

The Puget Sound Regional Council released its Draft Regional Housing Needs Assessment analyzing conditions, trends, and gaps in housing choices in our region. According to the report, 810,000 more homes are needed in the central Puget Sound region (King, Snohomish, Pierce, and Kitsap counties) by 2050 for there to be enough housing options for all current and future residents.

The Growth Management Act (GMA) represented a major change in land use, zoning, and planning to reduce sprawl, concentrate urban growth, and provide an adequate supply of housing for diverse economic segments of our communities. While the GMA and other planning tools have often succeeded in providing both localized and holistic improvements to housing, transportation, facilities, and environmental challenges, the CPPs fall short of adequately providing policy guidance to help increase housing supply, choice, and affordability for our diverse region.

It is critical now more than ever that the CPPs provide clear policy guidance that ties back to the GMA, connecting overarching goals to local accountability. While many jurisdictions are proactively planning for housing, we are also seeing an increase in jurisdictions that are using the GMA as a tool to deflect housing, equity, and job growth responsibilities onto other cities. This was never the GMAs intent. There is no way policy goals in the CPPs can be achieved unless there is additional specificity and required actions, spelled out in the policies. MBAKS supports increased transparency to promote accountability in local jurisdictions through housing data collection, analysis, and monitoring.

Further, we encourage you to request jurisdictions quantify the fiscal impact of policies and implementing regulations that may add to the cost of housing prior to adoption.
This ‘housing impact analysis’ should include any land use and regulatory changes under consideration to understand the effect on housing costs and affordability.

MBAKS appreciates the hard work of staff and the Council to update the CPPs and thanks you for the opportunity to provide comments and feedback. We look forward to continuing to engage closely with the GMPC and the County as these policies are further developed and adopted to establish the framework for growth in King County and its cities. Please do not hesitate to reach out with questions, comments, or any additional information we can provide.

Sincerely,

Jennifer Anderson
King County Manager, Government Affairs

Gina Clark
King County Manager, Government Affairs

CC: Karen Wolf, King County, Senior Policy Analyst, Performance, Strategy and Budget
Rebeccah Maskin, King County, Demographic Planner, King County Office of Performance Strategy and Budget

<table>
<thead>
<tr>
<th>Chapter</th>
<th>Policy</th>
<th>MBAKS Comments</th>
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<tbody>
<tr>
<td>General Policies</td>
<td>G-2 Monitor and benchmark the progress of the Countywide Planning Policies towards achieving the Regional Growth Strategy inclusive of the environment, development patterns, housing, the economy, transportation and the provision of public services. Identify corrective actions to be taken if progress toward benchmarks is not being achieved.</td>
<td>We appreciate that corrective action will be taken when CPP goals are not being met. However, the policy is vague. When are corrective measures triggered? What types of corrective measures are required to be taken? If CPPs are not being met, can you require the County or a city in the county to take corrective measures? Providing more specificity here will ensure this policy is effectively implemented. Lastly, jobs-housing balance should be included within this policy.</td>
</tr>
<tr>
<td>Environment</td>
<td>EN-2 Develop and implement environmental strategies using integrated and interdisciplinary approaches for environmental assessment and planning, in coordination with local jurisdictions, tribes, and countywide planning groups.</td>
<td>This policy is difficult to understand. We have been implementing environmental strategies in WA state since the early 1970s. This includes, but is not limited to SEPA, SMA, GMA, NPDES, and other environmental requirements that local governments implement within their regulations.</td>
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<tr>
<td><strong>Environmental Sustainability</strong></td>
<td><strong>EN-3</strong> Encourage the transition to a sustainable energy future by reducing demand through planning for efficiency and conservation, supporting development of energy management technology such as advanced thermostats or software that optimizes usage, and by meeting reduced needs from sustainable sources.</td>
<td>Is this policy referring to strategies that have already been implemented? If this is referring to new environmental strategies or regulations, could you please be more specific about how this policy would be implemented in local plans and regulations? While we recognize the importance of our environmental framework in WA, we are simply concerned about the connection between new regulations and requirements as it relates to providing a variety of housing types for all income levels and the requirement to encourage urban growth. When policies are ambiguous, it is difficult to understand how the county and cities within the county will be implementing this policy. This policy seems redundant to what is already required of local governments under the Growth Management Act (GMA). Please consider removing. Providing additional clarity at the very least is warranted. We would appreciate the following language be included within this policy: …such as advanced thermostats or software that optimizes usage <strong>while not increasing the cost for new home construction</strong> and meeting reduced needs from sustainable sources. We appreciate the intent of EN-3 and support its outcomes. However, we want to make sure that when new policies are put in place, there is a connection to other policies in the CPPs and requirements under the GMA, such as providing a variety of housing types for <strong>all</strong> income levels. Housing costs must be considered if we are to avoid contradictions in policies as well as meet the intent of other CPPs.</td>
</tr>
<tr>
<td><strong>Earth and Habitat</strong></td>
<td><strong>EN-7</strong> Locate development in a manner that minimizes impacts to natural features through the use of environmentally sensitive development practices that take into account design, materials, construction, and ongoing maintenance.</td>
<td>This policy is both difficult to understand and ambiguous. What environmentally sensitive development practices—beyond the extensive existing requirements under state law—are you referring to?</td>
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</table>
As the founders of Built Green, we very much appreciate the emphasis on design, materials, construction, and ongoing maintenance. However, we are concerned that this policy fails to connect how some of these items could impact the cost of providing housing.

We ask that you modify the policy as follows:

**EN-7** Locate development in a manner that minimizes impacts to natural features through the use of environmentally sensitive development practices that take into account design, materials, construction, and ongoing maintenance **while not increasing costs to develop housing.**

<table>
<thead>
<tr>
<th>Earth and Habitat</th>
<th>EN-15 Enhance the urban tree canopy to provide wildlife habitat, support community resilience, mitigate urban heat, manage stormwater, conserve energy, improve mental and physical health, and strengthen economic prosperity. Prioritize places where Black, Indigenous, and other people of color, low income, and frontline community members live.</th>
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<tbody>
<tr>
<td>Climate change</td>
<td>EN-30 Adopt and implement policies and programs that substantially reduce greenhouse gas emissions to meet state, regional, and local emissions reduction goals, including</td>
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We appreciate this policy. However, the policy must recognize that enhancing urban tree canopy must be balanced with the requirement to encourage development in urban areas. Urban tree policies cannot come at the expense of permitting urban development. If urban development is further restricted, development will occur in rural areas at a greater pace than expected. We request the policy be modified as follows:

**EN-15** Enhance the urban tree canopy to provide wildlife habitat, support community resilience, mitigate urban heat, manage stormwater, conserve energy, improve mental and physical health, and strengthen economic prosperity. **Ensure urban tree canopy regulations do not interfere with the goal of encouraging urban growth or negatively impact the ability to provide housing.** Prioritize places where Black, Indigenous, and other people of color, low income, and frontline community members live.

We appreciate this policy but request it be modified to recognize and consider how “policies and programs” could impact the cost to provide a variety of housing types for all income levels within
<table>
<thead>
<tr>
<th>Category</th>
<th>Policy</th>
<th>Description</th>
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<tbody>
<tr>
<td>Climate change</td>
<td>EN-18</td>
<td>Reduce countywide sources of greenhouse gas emissions compared to a 2007 baseline, as follows: 25% by 2020, 50% by 2030, 80% by 2050, 90% by 2060.</td>
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<td></td>
<td>We support the reduction of countywide sources of greenhouse gases. However, we are concerned that this policy may not be aligned with measures jurisdictions would have to take to make this policy more attainable.</td>
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<td>If this policy is going to be included, we ask that you also include additional policies in the CPPs that require King County jurisdictions to take additional measures to ensure success. This would include substantially reducing the amount of single-family zoning. If Seattle still has 70% single-family zoning, how do you expect to achieve these goals?</td>
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<td>If some King County jurisdictions still allow non-urban densities in their cities, how will these goals be achieved?</td>
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<td>If we continue to take actions that make housing more expensive, how will you possibly achieve a jobs/housing balance that will take enough cars off the road to achieve these goals?</td>
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<td>To be clear, we applaud the goal. However, while many jurisdictions are taking great actions to implement these goals, many others are not. This must be reconciled within the CPPs.</td>
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<tr>
<td>Development Patterns</td>
<td>DP-2</td>
<td>Accommodate housing and employment growth first and foremost in cities and centers within the Urban Growth Area, where,</td>
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<td>We appreciate the additional policy language. We ask that additional language be added to ensure there is a</td>
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<tr>
<td>Urban Growth Area</td>
<td>residents and workers have higher access to opportunity and high-capacity transit. Promote a pattern of compact development within the Urban Growth Area that includes housing at a range of urban densities, commercial and industrial development, and other urban facilities, including medical, governmental, institutional, and educational uses and schools, and parks and open space. The Urban Growth Area will include a mix of uses that are convenient to and support public transportation in order to reduce reliance on single occupancy vehicle travel for most daily activities.</td>
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</table>
| Urban Growth Area | stronger relationship between jobs/housing balance requirements.  
DP-2 Accommodate housing and employment growth first and foremost in cities and centers within the Urban Growth Area, where residents and workers have higher access to opportunity and high-capacity transit. Jobs/housing balance within, and outside of King County, shall be considered when employment targets are set to ensure jobs will be located near where people can find housing that is affordable.  
It is difficult to understand the current strategy where so many jobs are being added to places such as Bellevue, yet the vast majority of people working in those jobs are forced to live far from employment centers. King County and the cities in the county must also consider where people are living in relation to jobs centers in Seattle and Bellevue. Additional specificity to strengthen this policy is warranted. |
| Urban Growth Area | DP-3 Efficiently develop and use residential, commercial, and manufacturing land efficiently in the Urban Growth Area to create healthy and vibrant urban communities with a full range of urban services, and to protect the long-term viability of the Rural Area and Resource Lands. Promote the efficient use of land within the Urban Growth Area by using methods such as:  
- a) Directing concentrations of housing and employment growth to high opportunity areas like designated centers and station areas, consistent with the numeric goals in the regional growth strategy;  
- b) Encouraging compact development with a mix of compatible residential, commercial, and community activities;  
- c) Maximizing the use of existing capacity for housing and employment; |
| Urban Growth Area | We appreciate the term “efficiently” being added to this policy. We suggest the following changes to the beginning of this policy:  
Develop and use Residential, commercial, and manufacturing land shall be used efficiently…  
Promote the efficient use of land within the Urban Growth Area by using methods such as:  
We also ask that you add the following bullets to the list:  
- Allowing the placement of Accessory Dwelling Units in all residential zones  
- Reducing the amount of zoning dedicated to single-family detached housing where redevelopment of those areas would result in higher density housing options. |
| Urban Growth Area | DP-6 Plan for development patterns Adopt land use and community investment strategies that promote public health and address racially and ethnically disparate health outcomes and promote access to opportunity, by providing. Provide all residents with opportunities for employment, safe and convenient daily physical activity, social connectivity, and protection from exposure to harmful substances and environments, and housing in high opportunity areas. |
| Urban Growth Area | We appreciate these policy changes. Generally speaking, it is unclear how the County or the cities in the county will “Provide all residents with opportunities for employment”. We also believe this policy could be strengthened with additional emphasis on jobs/housing balance. Lastly, we appreciate the reference to providing housing in high opportunity areas. We believe this policy could be strengthened by identifying specific measures that will be taken to open up zoning for a variety of housing types that will ensure this policy is implemented. |
| Urban Growth Area | DP-13 All jurisdictions shall plan Plan to accommodate housing and employment targets in all jurisdictions. This includes: • a) Using the adopted targets as the land use assumption for their comprehensive plan; • b) Establishing local growth targets for regional growth centers and regional manufacturing-industrial centers, where applicable; • c) Adopting comprehensive plans and zoning regulations that provide capacity for residential, commercial, and industrial uses that is sufficient to meet 20-year growth needs targets and is consistent with the desired growth pattern described in VISION 2040 2050; • d) Coordinating local water, sewer, transportation and other infrastructure plans and investments among agencies, including special purpose district plans, are consistent with adopted targets as well as regional and countywide plans; and We believe this policy could be strengthened as follows: • c) Adopting Comprehensive plans and zoning regulations that provide capacity for residential, commercial, and industrial uses that is sufficient to meet 20-year growth needs targets and is consistent with the desired growth pattern described in VISION 2040 2050; For residential, identifying capacity shall also include providing sufficient land for housing, including, but not limited to, single-family residences, government-assisted housing, housing for low-income families, townhomes, accessory dwelling units, manufactured housing, multifamily housing, and group homes and foster care facilities and adequate provisions for existing and projected needs of all economic segments of the community consistent with RCW 36.70A.070(2). If the goal is not to expand UGAs, simply providing “capacity” is not enough. Zoned capacity is easy to identify. Capacity that will be available during the planning |
- e) Transferring and accommodating unincorporated area housing and employment targets as annexations occur.

| Urban Growth Area | DP-16 Allow expansion of the Urban Growth Area only if at least one of the following criteria is met: a) A countywide analysis determines that the current Urban Growth Area is insufficient in size and additional land is needed to accommodate the housing and employment growth targets, including institutional and other non-residential uses, and there are no other reasonable measures, such as increasing density or rezoning existing urban land, that would avoid the need to expand the Urban Growth Area; or We ask that you revisit this policy. While we understand that UGA expansions will only be looked at in limited circumstances, the language in a) eliminates an expansion in every circumstance.
| Urban Growth Area | DP-17 Add land to the Urban Growth Area only if the expansion of the Urban Growth Area is warranted based on the criteria in DP-16(a) or DP-16(b), and it meets all of the following criteria: a) Is adjacent to the existing Urban Growth Area; b) For expansions based on DP-16(a) only, is no larger than necessary to promote compact development that accommodates anticipated growth needs and is adjacent to the existing Urban Growth Area boundary; b) For expansions based on DP-16(b): i) Is adjacent to the original 1994 contiguous Urban Growth Area boundary; e) Can be efficiently provided with urban services and does not require any supportive facilities, services, roads, or any infrastructure to cross or be located in the Rural Area or new open space area. For b) ii), what does “overly burden” mean? Is this defined? Shouldn’t this be a reference to LOS? Subjective language like this should be removed.
|
and does not overly burden King County road networks in the Rural Area; 

iv) Follows topographical features that form natural boundaries, such as rivers and ridge lines and does not extend beyond natural boundaries, such as watersheds, that impede the provision of urban services;

v) Is not currently designated as Resource Land;

vi) Is sufficiently free of environmental constraints to be able to support urban development without significant adverse environmental impacts, unless the area is designated as an Urban Separator by interlocal agreement between King County and the annexing city; and

vii) Is for expansions that are adjacent to a municipal boundary, approval shall be subject to an agreement between King County and the city or town adjacent to the area that the area will be added to the city’s Potential Annexation Area. No development on the property shall occur until the property is annexed by the city.

These Urban Growth Area expansions require an agreement between the property owner, the annexing city, and the County. Upon ratification of the amendment, the Countywide Planning Policies will reflect both the Urban Growth Area change and Potential Annexation Area change.

<table>
<thead>
<tr>
<th>Urban Growth Area</th>
<th>DP-20</th>
<th>As outlined in RCW 36.70A.215(b), “Reasonable measures are those actions necessary to reduce the differences between growth and development assumptions and targets contained in the countywide planning policies and the county and city comprehensive plans with actual development patterns.”</th>
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<td>If necessary based on the findings of a periodic buildable lands evaluation report, adopt reasonable measures, other than expansion of the Urban Growth Area, to increase land capacity for housing and employment growth within the Urban Growth Area by making more efficient use of urban land consistent with current plans.</td>
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</tbody>
</table>
The County and its cities, through the Growth Management Planning Council, will collaboratively determine whether reasonable measures other than amending the Urban Growth Area are necessary to ensure sufficient additional capacity if a countywide urban growth capacity report determines that:

a) the current Urban Growth Area is insufficient in capacity to accommodate the housing and employment growth targets; or

b) any jurisdiction contains insufficient capacity to accommodate the housing and employment growth targets, has not made sufficient progress toward achieving the housing and employment growth targets, or has not achieved urban densities consistent with the adopted comprehensive plan.

Reasonable measures should be adopted to help implement local targets in a manner consistent with the Regional Growth Strategy.

The language being proposed lacks enough specificity to allow stakeholders to understand what specific criteria will be utilized to determine when reasonable measures will be required. B) states “…has not made sufficient progress toward achieving the housing and employment growth targets”.

What is sufficient progress? How is this determined? How can stakeholders understand the process?

We ask that this language provide a much greater degree of specificity consistent with the statute and the Buildable Lands guidelines that were produced by Commerce.

We also believe the last paragraph is incorrect. It is strange that this refers to the Regional Growth Strategy and not the Growth Management Act, where all of the Review and Evaluation requirements are contained. This policy should align, to a greater degree, with the GMA requirements for reasonable measures.

### Urban Growth Area

| DP-X2 | Adopt any necessary reasonable measures in comprehensive plans, and these may include increased land capacity for housing and employment or other measures to promote growth that is consistent with planned urban densities and adopted housing and employment targets. Jurisdictions will report adopted reasonable measures to the GMPC and will collaborate to provide data periodically on the effectiveness of those measures. |

We appreciate that the GMPC "will collaborate to provide data periodically on the effectiveness of those measures."

We ask that you provide more specificity about when you will be looking at the effectiveness of reasonable measures and what will occur if they are not being effective. The new policy language is very vague.

### Housing

**Housing Inventory and Needs Analysis**

| H-2 | Address Prioritize the need for housing affordable to households at less than 30% AMI (very extremely low income) by implementing tools such as: recognizing that this is where the greatest need exists, and addressing this need will require funding, policies, and collaborative actions by all jurisdictions working individually and collectively. |

Many of the items in this policy are portrayed as being "tools" to support low-income housing but most of the items listed are statements, rather than tools.

It is also worthy to note that this policy is vague and does not require any particular action by the county or any city.
<table>
<thead>
<tr>
<th>Housing Inventory and Needs Analysis</th>
<th>H-4 New Policy</th>
<th>Evaluate the effectiveness of existing housing policies and strategies to meet a significant share of countywide need. Identify gaps in existing partnerships, policies, and dedicated resources for meeting the countywide need and eliminating racial and other disparities in access to housing and neighborhoods of choice.</th>
<th>We appreciate this new policy as it will require a substantial investment to complete. How will the effectiveness of existing housing policies be evaluated? What will happen when housing policies in some jurisdictions are not working or are not being implemented? Understanding more about how this policy will be put into action would be really appreciated. We hope that stakeholders, such as MBAKS, will be invited to work on this issue.</th>
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<tbody>
<tr>
<td>Housing Inventory and Needs Analysis</td>
<td>H-9 Adopt intentional, targeted actions that repair harms to Black, Indigenous, and People of Color (BIPOC) households from past and current racially exclusive and discriminatory land use and housing practices (generally identified through Policy H-5). Promote equitable outcomes in partnership with communities most impacted.</td>
<td>We support this policy. What types of specific, intentional actions will you be looking at? This policy (along with HO-5) is so general in nature it is hard to understand what actions the County and all the cities will be required to take and how this aligns with other polices in the CPPs. More specificity is warranted.</td>
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<tr>
<td>Strategies to Meet Housing Needs</td>
<td>H-9 Plan for housing that is accessible the workforce in them so people of all incomes can live near or within commuting distance of their places of work. Encourage increase housing choices for everyone—particularly those earning lower wages—in locations accessible to or within a reasonable commute to major employment centers and affordable to all income levels. Ensure there are zoning ordinances and building policies in place that allow and encourage housing production at levels that improve the jobs-housing balance of housing to employment throughout the county across all income levels.</td>
<td>The term “reasonable commute” must be defined. Currently, people are having to move farther from jobs centers to find housing that is affordable, and it is difficult to identify any policies within the CPPs that will make this better. This problem is increasing rapidly, and we must identify and highlight policies that will move the needle. We appreciate the jobs/housing balance language, but what measures are being required to improve jobs/housing balance? What happens when this is not being achieved? We also believe that housing language in this policy could be strengthened by simply referring to RCW 36.70A.070(2). We appreciate this policy but there are actually no strategies proposed in the</td>
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<tr>
<td>Strategies to Meet Housing Needs</td>
<td>H-17 Lower barriers to and promote access to affordable homeownership for extremely low-, very low-, and low-income households. Emphasize: a. supporting long-term affordable homeownership opportunities for households earning at or below 80% AMI (which may require up-front initial public subsidy and policies that support diverse housing types); and b. remedying historical inequities in and expanding access to homeownership opportunities for Black, Indigenous and People of Color communities.</td>
<td>We appreciate this policy. However, there is nothing in the policy that outlines how you will support these efforts. No strategies are listed or outlined. What are the strategies to lower barriers? How will you keep housing prices down when you have policies in other CPP chapters that will most assuredly increase the cost to provide housing. If you are going to add policies like this, make sure to add tangible strategies that will ensure the policy objectives are met.</td>
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<tr>
<td>Strategies to Meet Housing Needs</td>
<td>H-6 Preserve existing affordable housing units, where appropriate, including.</td>
<td>While we support this policy, it is unclear what anti-displacement measures you would like to see concurrently with development capacity increases.</td>
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</table>
### Measuring Results

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<tr>
<th>H-18 Review and amend, a minimum every five years, the countywide and local housing policies and strategies and actions when especially where monitoring in Policy H-23 and H-24 indicates that adopted strategies are not resulting in adequate affordable housing to meet the jurisdiction’s share of the countywide need. Consider amendments to land use policies and the land use map where they present a significant barrier to the equitable distribution of affordable housing.</th>
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<tbody>
<tr>
<td>While we appreciate how much data the county collects on housing, there is more data collection than tangible actions taken. We suggest that this policy be expanded and more specifically outline the types of actions jurisdictions will have to take when affordability indicators are not being met.</td>
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</table>

### System Operations

<table>
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<tr>
<th>T-22 Plan and develop a countywide transportation system that supports the connection between land use and transportation, and essential travel that reduces greenhouse gas emissions by advancing strategies that shorten trip length or replace vehicle trips to decrease vehicle miles traveled.</th>
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<tr>
<td>We appreciate this policy. However, the jobs/housing imbalance is likely to widen. How do you plan to reduce VMT when current policies are moving people farther from job centers? It is also important to highlight that this is a regional problem, not just King County. People are moving to Pierce and Snohomish counties to find housing that is affordable, and yet significant new jobs are planned in Seattle and Bellevue. How are we going to enough housing near job centers that is affordable? How do we provide a transportation system that serves people who already commute to jobs centers via automobile? T-22 does not paint a clear picture on how the goal of reducing VMT is actually going to be reduced as our population grows.</td>
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While this can be done, please make sure that the measures implemented are not in conflict with the GMA requirements to encourage urban growth and that measures do not increase the costs of housing.

It is important that a wholistic approach is taken to ensure that measures that are intended to address one issue doesn’t inadvertently hinder other goals.
# Vision statement
- People from all backgrounds are feel welcome and included as valued community members.
- All residents have access to opportunity and households and neighborhoods are stable as communities develop and grow.
- Residents and visitors experience a safe, affordable, equitable, and efficient transportation system that connects people to where they want to go.
- Housing is characterized by a full range of options that are healthy, safe, and affordable.
- The county’s environmentally critical areas are protected and have been restored and open spaces are well distributed, inviting, and healthy.

**FW-2**
Monitor and benchmark the progress of the Countywide Planning Policies towards achieving the Regional Growth Strategy inclusive of the environment, development patterns, housing, the economy, transportation and the provision of public services. Identify corrective actions to be taken if progress toward benchmarks is not being achieved. Include monitoring that tracks and analyzes disparity levels in priority determinants of health and equity.

**FW-3**
Consistency. The Countywide Planning Policies provide a common framework for local planning and each jurisdiction is required to update its comprehensive plans to be consistent with the Countywide Planning Policies. The full body of the Countywide Planning Policies is to be considered for decision-making within the context of each individual city’s needs and situations.

**FW-4**
Adopt comprehensive plans that are consistent with the Countywide Planning Policies as required by the Growth Management Act.

**Equity.** The Countywide Planning Policies coordinate planning for a future where King County residents have equitable access to housing, transportation, education, employment choices, and open space amenities and are protected from disparate pollution burdens, regardless of their race, ethnicity, or income. Through their comprehensive plans, and additional sub-area planning, jurisdictions will create targeted policies and strategies unique to their local circumstances to achieve this goal.

**Rationale/basis**
- Open space is important for a variety of reasons, especially as we achieve higher densities, per the plan.
- Understanding which communities are experiencing the greatest need is critical for adaptive management.
- Acknowledging that application will remain sensitive to context.
- Added scope, depth and specificity about what included in equity focus.
| FW-5 | Ensure infrastructure plans, zoning and code adjustments, and facility investments correct for historic and existing disparities in access to determinants of equity at all jurisdictional scales. Ensure culturally appropriate access to foundational community conditions, particularly for those most disproportionately cost-burdened or historically excluded. | Suggest including all ‘levers of change’ |
| FW-6 | Develop and use an equity impact review tool when developing plans and policies to test for outcomes that might adversely impact or fail to sufficiently support Black, Indigenous, immigrant, and other communities. Regularly assess impact of policies and programs to identify actual outcomes and adapt as needed to achieve intended goals. | Suggests a broader use and application of Equity Impact Review tool. |
| FW-7 | Promote and support civic engagement, government accountability, and transparency through continuous involvement of and collaboration with community groups and organizations, especially those of Black, Indigenous, immigrant, and other communities. | |
| Environment Chapter overarching goal | **Overarching Goal:** The quality of the natural environment in King County is restored and protected, adapted to respond to the influences of climate change, and equitable in benefit pattern to current and future generations. | Added climate resilience and equity perspective |
| Environmental sustainability opening narrative | Local governments have a key role in shaping sustainable communities by integrating sustainable development and business practices with ecological, social, and economic concerns. Local governments also play a pivotal role in ensuring environmental justice by mitigating and preventing undue environmental and health impacts on minority Black, Indigenous, immigrant, of varying abilities across the life span and other communities and low-income populations and by meaningfully engaging with frontline communities to ensure fairness in the development and application of policies and regulations. | Promotes ‘Process Equity’. |
| EN-1 | Incorporate environmental protection and restoration efforts including climate action, mitigation, and resilience into local comprehensive plans to ensure that the quality of the natural environment and its contributions to human health and vitality are prioritized for front line communities and sustained now and for future generations. | |
| EN-5 | Ensure all residents of the region regardless of race, social, or economic status have a clean and healthy environment. Eliminate and correct for historical and ongoing disparities in exposure to environmental harms. Identify, mitigate, and/or correct for unavoidable negative impacts of public actions that disproportionately affect people of color and low-income populations those frontline communities that are disproportionately impacted due to existing and historical racial, social, environmental, and economic inequities, disability and | Suggests a stronger focus on Environmental Justice considerations. |
other barriers across lifespan, and who have limited resources or capacity to adapt to a changing environment.

| Earth and Habitat introductory narrative | Healthy ecosystems and environments are vital to the sustainability of all plant and animal life, including humans. Protection of biodiversity in all its forms and across all landscapes is critical to continued prosperity and high quality of life in King County. The value of biodiversity to sustaining long-term productivity and both economic and ecological benefits is evident in fisheries, forestry, and agriculture. For ecosystems to be healthy and provide healthful benefits to people and future ecosystem functions, local governments must prevent negative human impacts and work to ensure that this ecosystem remain diverse and productive over time. | Suggests addition that speaks to intergenerational equity. |
| EN-6 | Locate development in a manner that minimizes impacts to natural features through the use of environmentally sensitive development practices that take into account design, materials, construction, and ongoing maintenance requirements. | Strengthens focus on maintenance by mentioning that as a requirement. |
| EN-7 | Coordinate approaches and standards for defining and protecting critical areas, and support biodiversity and resilience in the face of changing climate by designing, restoring, and protecting a connected system of multi-directional, cross-jurisdictional migratory corridors for primary use by avian, insect, non-human mammal, and other species. | Migratory corridors foster ecosystem resilience in the face of changing climate. |
| EN-10 | Reduce and mitigate heat gain, air, noise, and light pollution caused by transportation, industries, public facilities, and other hazards. Prioritize reducing these impacts on vulnerable populations and areas that have been disproportionately affected. | |
| EN-12 | Fund, implement, and monitor implementation of salmon habitat protection and restoration priorities in approved Water Resource Inventory Area plans. | |
| EN-13 | Enhance the urban tree canopy to provide wildlife habitat, support community resilience, mitigate urban heat, manage stormwater, conserve energy, protect and improve mental and physical health, and strengthen economic prosperity. Prioritize places where Black, Indigenous, and other people of color, low income, and frontline community members live, work, play, learn, and worship. | |
| EN-14 | Coordinate Plan, design and collaborate on flood hazard management efforts at the regional, system, and watershed-scale and fund holistic equitable and resilient flood hazard management efforts through the King County Flood Control District. | Suggests more than coordination is relevant here. |
| EN-15-EN-16 | Work cooperatively with federal, state, and regional agencies and forums to develop regional levee maintenance standards that advance equitable public safety and property protection while protecting and restoring habitat. | |
| EN-14-EN-19 | Manage natural drainage systems to improve water quality and habitat functions, minimize erosion and sedimentation, advance | Many stormwater considerations |
| EN-15–EN-21 | Establish or designate a multijurisdictional body with authority to generate funding and coordinate monitoring of ground and surface water quality, quantity, biological conditions, and related outcome measures. | Addresses gaps in OSS governance and considers new tools and approaches. |
| EN-1–EN-22 | Identify, preserve, restore, and maintain regionally significant open space networks in both Urban and Rural Areas through implementation of the Regional Open Space Plan. Develop strategies and funding to equitably protect lands that provide the following valuable functions:  
- Ecosystem linkages and migratory corridors crossing jurisdictional boundaries  
- Physical or visual separation delineating growth boundaries or providing buffers between incompatible uses;  
- Active and passive outdoor recreation and nature exposure and connection opportunities;  
- Wildlife habitat and migration corridors that preserve and enhance ecosystem resiliency in the face of urbanization and climate change;  
- Preservation of ecologically sensitive, scenic or cultural resources;  
- Urban green space, habitats, and ecosystems;  
- Forest resources; and  
- Food production potential. |  |
| EN-23 | Preserve and restore native vegetation and tree canopy, especially where it protects habitat, contributes to overall ecological function, and advances physical and mental health equity. | Mentioning health equity considerations. |
| EN-24 | Provide parks, trails, and open space within walking distance of urban area residents. Ensure sufficient programming and maintenance to achieve inclusive access. Prioritize historically underserved communities for open space improvements and investments. | To address health disparities, programming and maintenance are critical. |
| EN-25 | Reduce and promote affordable alternatives to the use of toxic pesticides, fertilizers, and other products to minimize risks to human health and the environment. |  |
| EN-2yz | Collaborate across jurisdictions to reduce or prevent formulation and/or availability of consumer, manufacturing, and industrial products that, through their life cycle, have a substantial probable risk of compromising the long-term viability, distribution, and/or abundance of terrestrial or aquatic species and/or present | New proposed policy to promote collaborative and ‘upstream’ approach to harm from consumer products, |
| EN-2ab | Ensure vulnerable residents and site users (based on age, disability, race/ethnicity, language preference) are protected from disparate harm from lead, arsenic, and other legacy pollutants in soils by requiring and ensuring sufficient testing and remediation of soils where food production or outdoor play is a likely activity on the property. | New proposed policy to promote additional diligence in selected redevelopments. |
| EN-27 | Prevent, mitigate, and remediate harmful environmental pollutants and hazards, including light, air, soil, toxics in seafood, and structural hazards, where they have contributed to racially disparate environmental and health impacts, and to increase environmental resiliency in low-income communities. |  |
| EN-30 | Plan for land use patterns and transportation systems that minimize air pollution and greenhouse gas emissions, to include:  
- Maintaining or exceeding existing standards for carbon monoxide, ozone, and particulates;  
- Use of equity impact analysis tool to test for and prevent or mitigate land use practices that disproportionately impact low income and other historically disadvantaged communities;  
- Direct growth to Urban Centers and other mixed use/ high density locations that support high capacity transit, encourage walking, rolling, and bicycle modes of travel, and reduce trip lengths; |  |
| EN-19—EN-34 | Promote energy efficiency, conservation methods, and sustainable energy sources, electrification of the transportation system, reduction of single occupancy trips and vehicle miles traveled, to reduce greenhouse gases, and consumption of fossil fuels to support state, regional, and local climate change reduction goals, and reduce air pollution, especially for communities overburdened by environmental risk and exposures. | Suggests adding environmental justice considerations here. |
| EN-35 | Address rising sea water by siting and planning for relocation of hazardous industries and essential public services away from the 100 and 500-year floodplains. | 500 year flood plains should not be our only consideration here. |

**Development Patterns chapter**

**Overarching Goal:** Growth in King County occurs in a compact, centers-focused pattern that uses land and infrastructure efficiently, connects people to opportunity, promotes stable communities, and protects Rural and Resource Lands.  
Add considerations about anti-displacement.
**Urban Growth Area**

**Opening narrative**

Several additional elements in the Development Patterns chapter reinforce the vision and targeted growth pattern for the Urban Growth Area. Procedures and criteria for amending the Urban Growth Area boundary address a range of objectives and ensure that changes balance the needs for land to accommodate growth with the overarching goal of preventing sprawl and advancing equitable development within the county. A review and evaluation program provides feedback for the county and cities on the effectiveness of their efforts to accommodate and achieve the desired land use pattern. Joint planning facilitates the transition of governance of the Urban Growth Area from the county to cities, consistent with the Growth Management Act, and helps ensure equitable governance and service provision.

Urban form and development within the Urban Growth Area are important settings to provide people with access to jobs and housing, choices to engage in more physical activity, eat healthy food, and minimize exposure to harmful environments and substances. Access to sidewalks and pathways, healthy food, and open space is not shared equally across the urban area. Historical underinvestment in neighborhoods where communities of color have been concentrated and exclusion of communities of color from high-opportunity areas persists today. The stability and sustainability of the Urban Growth Area depends on fostering development patterns that provide access to opportunity for all.

| DP-3 | Efficiently develop and use residential, commercial, and manufacturing land efficiently and equitably in the Urban Growth Area to create healthy and vibrant urban communities with a full range of urban services, and to protect the long-term viability of the Rural Area and Resource Lands. Promote the efficient and equitable use of land within the Urban Growth Area by using methods including:
|      | ● a) Direct concentrations of housing and employment growth to high opportunity areas like designated centers and station areas, consistent with the numeric goals in the regional growth strategy;
|      | ● b) Encourage compact development with a mix of compatible residential, commercial, and community activities;
|      | ● c) Maximizing the use of existing capacity for housing and employment;
|      | ● d) Redevelop underutilized lands, in a manner that considers equity and mitigates displacement; and
|      | ● e) Coordinate plans for land use, transportation, schools, capital facilities and services.
|      | f) Monitor and respond to residential and commercial destabilizing forces in neighborhoods |

| DP-5 | Decrease greenhouse gas emissions and advance health equity through land use strategies that promote a mix of housing, | Suggest adding the monitoring of neighborhood destabilization factors |
employment, and services at densities sufficient to promote walking, bicycling, transit, and other alternatives to auto travel.

| DP-6 | Plan for development patterns: Adopt land use and community investment strategies that promote public health and address racially and ethnically disparate health outcomes and promote access to opportunity, by providing focus on residents with greatest needs in providing and enhancing opportunities for employment, safe and convenient daily physical activity, social connectivity, and protection from exposure to harmful substances and environments, and housing in high opportunity areas. |
| DP-7 | Plan for development patterns: Street networks that provide a high degree of connectivity and sufficient facilities and use of space in roadways to encourage walking, bicycling, and transit use, and that promote safe and healthy routes to and from public schools. Points here tie to language in the Transportation chapter. |
| DP-8 | Increase access to healthy, affordable, culturally-relevant food in communities throughout the Urban Growth Area by encouraging and incentivizing the location of healthy food purveyors, such as grocery stores, farmers markets, and community food gardens in proximity to residential uses and transit facilities, especially in those areas with limited healthy food access. Key opportunity to strengthen language around food justice. |
| DP-11 | ● c) Efficiently using existing zoned and future planned development capacity as well as the capacity of existing and planned infrastructure, including sewer and water, and stormwater systems, and capacity for on-site sewer systems. 
● d) Promoting a land use pattern that can be served by a connected network of public transportation services and facilities, including safe and sufficient pedestrian and bicycle infrastructure and amenities; Important to calibrate development allowances with the fate of sewage. |
| DP-13 | All jurisdictions shall plan to accommodate housing and employment targets in all jurisdictions. This includes: 
● c) Adopting and sub-area plans and zoning regulations that provide capacity for residential, commercial, and industrial uses that is sufficient to meet 20-year growth needs targets and is consistent with the desired growth pattern described in VISION 2040 and 2050 and are adapted to reflect connected or on-site sewerage opportunities and constraints; 
● d) Coordinating adopted local water, sewer, shared septic, transportation and other infrastructure plans and investments among agencies, including special purpose district plans, are consistent with adopted targets as well as regional and countywide plans; and |
| DP-34 | Evaluate, respond, and adapt to potential physical, economic, and cultural displacement of residents and businesses in regional growth centers and high-capacity transit station areas, particularly for Black, Indigenous, immigrant, and other communities at |
| DP-36—DP-38 | Mitigate or eliminate racial and economic disparities in negative health impacts of the activities in Manufacturing/Industrial Centers on residential communities, schools, open space, and other public facilities. |
| DP - Urban Design and Historic Preservation Narrative introduction | The countywide vision includes elements of urban design and form intended to integrate urban development into existing built and natural environments in ways that enhance urban and natural settings to create vibrant places. These elements promote public health and advance health equity, include high quality design, context sensitive infill and redevelopment, historic preservation and cultural awareness, as well as the interdependence of urban and rural and agricultural lands and uses. |
| DP-40 | Promote a high quality of design and site planning in publicly-funded and private development throughout the Urban Growth Area. Where appropriate, provide for connectivity facilities and space allocation in the street network to accommodate walking, bicycling, and transit use, in order to promote health equity and well-being. |
| DP-41 | Preserve significant historic, visual, archeological, cultural, architectural, artistic, and environmental features, especially where growth could place these resources at risk. Celebrate and stabilize cultural resources that reflect the diversity of the community. Where appropriate, designate individual features or areas for protection or restoration. Encourage land use patterns and adopt regulations that protect historic resources and sustain historic community. |
| DP-42 | Design new development to create and protect systems of green infrastructure, such as urban forests, parks, green roofs, and natural drainage systems, in order to reduce climate-altering pollution, advance health equity, and increase resilience of communities to climate change impacts. Prioritize neighborhoods with historical underinvestment in green infrastructure. Use natural features crossing jurisdictional boundaries to help determine the routes and placement of infrastructure connections and improvements. |
| DP-43 | Design communities, neighborhoods, and individual developments using techniques that reduce heat absorption, particularly in regional and Countywide Centers and residential neighborhoods with less tree canopy and open spaces and higher social vulnerability. |
| DP-44 | Adopt flexible design standards, incentives, or guidelines that foster green building, multimodal transportation, and infill development that is compatible with advances health equity and enhances the existing or desired urban character. |
| **DP-45** | Provide opportunities for residential and employment growth within Cities in the Rural Area at levels consistent with adopted growth targets and adapted to sewer connectivity and the capacity of on site septic systems, given soil conditions. Growth levels should not create pressure for conversion of nearby Rural or Resource lands, nor pressure for extending or expanding urban services, infrastructure, and facilities such as roads or sewer across or into the Rural Area. | Key point is that development allowances hinge in part on the capacity for sewage connections or on site treatment. |
| Natural Resource Lands | **Goal Statement:** Resource Lands are valuable long-term assets of King County and are renowned for their productivity, sustainable management, and health benefits to residents of adjacent population centers. |  |
| **DP-54–DP-55** | Encourage best practices in agriculture and forestry operations for long-term protection of the natural resources, habitat, and health and wellness of workers. |  |
| **DP-58–DP-59** | Support agricultural, farmland, and aquatic uses that enhance the food system, and promote local production and processing of food to reduce the need for long distance transport and to increase the reliability and security of local food. Promote activities and infrastructure, such as farmers markets, farm worker housing, and agricultural processing facilities, that benefit both cities residents of adjacent urban areas and farms by improving access to locally grown agricultural products. |  |
| **DP-59–DP-60** | Support public, civic, and private institutional procurement policies that encourage purchases of locally grown food products. | Expanding this concept to multiple sectors. |
| **DP-60–DP-61** | Ensure that extractive industries and industrial-scale operations on resource lands maintain environmental quality and minimize negative impacts on adjacent lands and communities, especially where socially vulnerable residents are affected. |  |
| **DP-62–DP-63** | Use transfer of development rights to shift potential development from the Rural Area and Resource Lands into the Urban Growth Area, especially cities. Implement transfer of development rights within King County through a partnership between the county and cities that is designed to:  
  - f) Identify and secure opportunities to fund or finance infrastructure within city transfer of development rights receiving areas; and  
  - g) Be compatible with existing within-city transfer of development rights programs and neighborhood stabilization objectives. | Add considerations around gentrification and stabilization. |
| **Housing Chapter** | Conduct an inventory and analysis in each jurisdiction of existing and projected housing needs of all segments of the population and summarize the findings in the housing element. The inventory and analysis shall include: |  |
a. affordability gap of the jurisdiction’s housing supply as compared to countywide need percentages from policy H-1 (see table H-2 in Appendix);

b. number of existing housing units by housing type, age, number of bedrooms, occupants per room, condition [including indoor air and environmental quality considerations], tenure, and AMI limit (for income-restricted units); ....

K. the housing needs of people who need supportive services or accessible units, including but not limited to people experiencing homelessness, youth and teens, LGBTQ+, disabled persons, people with medical conditions, and older adults; and

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<tr>
<td>H-5</td>
<td>Document the local history of racially exclusive and discriminatory land use and housing practices, consistent with local and regional fair housing reports and other resources. Explain the extent to which that history is still reflected in current development patterns, housing conditions, tenure, and access to opportunity. Develop, implement and then demonstrate the degree policies and strategies are correcting for housing-related racially disparities. The County will support jurisdictions in identifying and compiling resources to support this analysis.</td>
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<tr>
<td>Changes seek to have this policy less backward looking and also be about remedy and corrective policy.</td>
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<tr>
<td>H-18</td>
<td>Promote equitable development and adopt anti-displacement strategies, including dedicated funds for land acquisition and affordable housing production and preservation. Mitigate displacement that may result from planning, infrastructure decisions, public and private investments, and market pressure. Implement anti-displacement measures prior to or concurrent with development capacity increases and capital investments.</td>
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<tr>
<td>H-21</td>
<td>Adopt and implement programs and policies that ensure healthy and safe homes, per King County Board of Health Guideline and Recommendation on Healthy Housing</td>
</tr>
<tr>
<td>Link to this document is here.</td>
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<tr>
<td>H-22</td>
<td>Plan for residential neighborhoods that protect and promote the health and well-being of residents by supporting equitable access to parks and open space, safe pedestrian and bicycle routes, clean air, soil and water, fresh and healthy foods, high-quality education from early learning through K-12, affordable and high-quality transit options, and living wage jobs and by reducing avoiding or mitigating exposure to environmental hazards and pollutants.</td>
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**Economy Chapter**

<table>
<thead>
<tr>
<th>EC-5</th>
<th>Help businesses thrive through:</th>
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<tbody>
<tr>
<td></td>
<td>• Transparency, efficiency, and predictability of local regulations and policies;</td>
</tr>
<tr>
<td><strong>EC-11</strong></td>
<td>Work with schools and other institutions to increase graduation rates and sustain a highly-educated and skilled local workforce. This includes aligning job training and education offerings that are consistent with the skill needs of the region’s industry clusters. Identify partnership and funding opportunities where appropriate. Align and prioritize workforce development efforts with Black, Indigenous, and other communities of color and immigrant communities.</td>
</tr>
<tr>
<td><strong>EC-16</strong></td>
<td>Add to the vibrancy and sustainability of our communities and the health and well-being of all people through safe and convenient access to local services, neighborhood-oriented retail, purveyors of healthy, affordable and culturally appropriate food (e.g. grocery stores and farmers markets), and transportation choices.</td>
</tr>
<tr>
<td><strong>EC-18</strong></td>
<td>Maintain an adequate supply of land within the Urban Growth Area to support meaningful and equitable economic development. Inventory, plan for, and monitor the land supply and development capacity for, manufacturing/industrial, commercial and other employment uses that can accommodate the amount and types of economic activity anticipated during the planning period.</td>
</tr>
<tr>
<td><strong>EC-19</strong></td>
<td>Support manufacturing/industrial centers by adopting industrial siting with land use policies that limit the loss of protect industrial land for environmentally responsible industrial uses, retain and expand industrial lands, maintain the region’s economic diversity, and employment, support family wage jobs a diverse regional economy, and provide for the evolution of these Centers to reflect industrial business trends, including in technology and automation. Prohibit or strictly limit non-supporting or incompatible activities that can interfere with the retention or operation of industrial businesses, especially in Manufacturing/Industrial Centers while recognizing that a wider mix of uses, in targeted areas and circumstances, may be appropriate when designed to be supportive of and compatible with industrial employment. Adding a qualifier to the type of industrial uses – to avoid exacerbating environmental injustices.</td>
</tr>
<tr>
<td><strong>EC-20</strong></td>
<td>Facilitate redevelopment of contaminated sites through local, county and state financing and other strategies that assist with planning, site design, and funding for environmental remediation with companion efforts to stabilize neighborhoods.</td>
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**Transportation Chapter**

**Transportation Chapter – overarching**

*Overarching Goal: The region is well served by an integrated, affordable, equitably accessible multi-modal transportation system that supports the regional vision for growth, efficiently*
<table>
<thead>
<tr>
<th>goal statement</th>
<th>moves people and goods, and is environmentally and functionally sustainable over the long term.</th>
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<tbody>
<tr>
<td>Supporting growth narrative introduction</td>
<td>An effective transportation system is critical to achieving the Regional Growth Strategy in an equitable manner and ensuring that centers are functional and appealing to the residents and businesses they are designed to attract. The policies in this section reinforce the critical relationship between development patterns and transportation and they are intended to guide transportation investments from all levels of government that effectively support local, county and regional plans to accommodate growth. Policies in this section take a multi-modal approach to serving growth, with additional emphasis on transit and nonmotorized safe, convenient walking and rolling modes to support planned development in centers.</td>
</tr>
<tr>
<td>T-1</td>
<td>Work cooperatively with the Puget Sound Regional Council, the state, and other relevant agencies to finance and develop an equitable and sustainable, door-to-door safety-oriented multi-modal transportation system that enhances regional mobility and reinforces the countywide vision for managing growth. Use VISION 20402050, the Regional Transportation 2040 Plan, and the Regional Growth Strategy as the policy and funding framework for creating a system of Urban Centers and Manufacturing/Industrial Centers linked by a multimodal network including high-capacity transit, frequent bus transit and an interconnected system of roadways, freeways and high-occupancy vehicle lanes.</td>
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<tr>
<td>T-3</td>
<td>Increase the share of trips made countywide by modes other than driving alone through coordinated land use planning, public and private investment, widely and equitably distributed expansion and improvements to walking and bicycling facilities, and programs focused on centers and connecting corridors, consistent with locally adopted mode split goals.</td>
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<tr>
<td>T-X1</td>
<td>Reduce the need for new capacity roadway improvements through investments in transportation system management and operations, pricing programs, and transportation demand management strategies that improve the efficiency of and access to the current system.</td>
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<tr>
<td>T-4</td>
<td>Develop station area plans for high capacity transit stations and transit-mobility hubs based on community engagement processes. Plans should reflect the unique characteristics, local vision for each station area including transit supportive land uses, transit rights-of-way, stations and related facilities, multi-modal linkages, safety improvements, place-making elements while avoiding or minimizing residential and small business displacement.</td>
</tr>
<tr>
<td>T-5</td>
<td>Support countywide growth management and climate objectives by prioritizing transit service to and pedestrian safety within areas.</td>
</tr>
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</table>
where existing housing and employment densities support transit ridership and to Urban Centers and other areas planned for housing and employment densities that will support transit ridership. Address the mobility needs of transit-dependent populations in allocating transit service and provide at least a basic level of service throughout the Urban Growth Area.

| T-X3 | Provide transit and mobility services and facilities for safe walking and rolling where they are needed most. Address the needs of Black, Indigenous, and people of color, people with low and no-incomes, and people with special transportation needs. Provide the appropriate service level to support the land uses in Urban Growth Areas. |
| T-X4 | Implement transportation programs and projects and provide pedestrian facilities that promote access to opportunity for Black, Indigenous, and people of color, people with low and no-incomes, and people with special transportation needs. |
| T-6 | Encourage transit ridership by integrating design of transit facilities and services as well as nonmotorized walking and rolling infrastructure so that they are integrated with public spaces and private developments to create a safe and inviting waiting and transfer environments and encourage transit ridership countywide public realm. |
| T-8 | Prioritize state, regional and local funding to transportation investments that support adopted countywide growth targets and are focused on multi-modal mobility, door-to-door safety, equity, and climate change goals, as well as centers (local, countywide and regional) where applicable. |

**Mobility Goal Statement:** A well-integrated, multi-modal transportation system transports people and goods equitably, effectively, and efficiently to destinations within the region and beyond.

| T-X7 | Determine if capacity needs can be met from investments in transportation system operations and management, pricing programs, transportation demand management, public transportation and system management activities that improve the efficiency of the current transportation system, prior to implementing roadway capacity expansion projects. Focus on investments that produce the greatest net benefits to people, especially communities and individuals where needs are greatest, and goods movement that avoid or minimize disparate environmental impacts of transportation. |
| T-11 | Develop and implement freight mobility strategies that strengthen, preserve, and protect King County’s role as a major regional freight distribution hub, an international trade gateway, and a manufacturing area, Avoid, minimize, and mitigate community impacts, especially to communities overburdened by pollution exposures. |
| T-13 | Site, Consider, address, and provide for mobility options, |
connectivity, active transportation access, and safety in the siting and design of transit stations and transit mobility hubs, to promote connectivity and access for pedestrian and bicycle patrons especially those that are serviced by high-capacity transit.

<p>| T-15 | Design and operate <strong>safe</strong> transportation facilities in a manner that is compatible with and integrated into the natural and built environments in which they are located. Incorporate features such as natural drainage, native plantings, and local design themes that facilitate integration and compatibility. |
| T-16 | <strong>Protect the</strong> Develop a resilient transportation system (e.g. roadway, rail, transit, sidewalks and trails, air, and marine) and protect against major disruptions by developing and climate change impacts. Develop prevention, adaptation, mitigation, and recovery strategies and by coordinating disaster response plans. |
| T-17 | Promote the use of telling and other pricing strategies and transportation system management and operations tools to effectively manage the transportation system and provide an equitable, stable, and sustainable transportation funding source and-to improve mobility and safety. |
| T-18 | Promote roads and transit facility design that includes well-defined, safe, and appealing spaces for pedestrians and bicyclists whenever appropriate for the conditions. |
| T-19 | Design roads and streets, including retrofit projects, to accommodate a range of motorized and walking and bicycle travel modes within the travel corridor in order to reduce injuries and fatalities, contribute to achieving the state goal of zero deaths and serious injuries, and to encourage physical activity. The design should include well-defined, safe and appealing spaces for pedestrians and bicyclists. |
| T-20 | Develop a transportation system that minimizes negative safety and environmental exposures and improves health outcomes in human health, including exposure to environmental toxins generated by vehicle emissions-communities, especially Black, indigenous, and other communities of color, low income communities and communities with high asthma prevalence rates, that have been disproportionately negatively affected by transportation decisions. |
| T-21 | Provide equitable opportunities for an active, healthy lifestyle by expanding and improving facilities, signage, and support for pedestrians and bicyclists in the local transit, municipal, countywide, and regional transportation plans and systems. |
| T-22 | Plan and develop a countywide transportation system that is based on the connection between land use and transportation, and essential travel that reduces greenhouse gas emissions by advancing strategies that shorten trip length or replace vehicle trips to decrease vehicle miles traveled. |</p>
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<tr>
<th>Public Facilities Chapter</th>
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<tr>
<td><strong>PF-X1</strong></td>
<td>Provide affordable and equitable access to public services to all communities, especially the historically underserved. Prioritize investments to address disparities in access to foundational community conditions that serve as determinants of equity.</td>
</tr>
<tr>
<td><strong>PF-2</strong></td>
<td>Coordinate among jurisdictions and service providers to provide reliable and cost-effective services to the public through sub-basin, local, and regional coordination among jurisdictions and service providers.</td>
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<tr>
<td><strong>Utilities</strong></td>
<td>Utilities include infrastructure and services that provide water supply, sewage treatment and disposal, solid waste disposal, energy, and telecommunications. Providing these utilities in a cost-effective way is essential to maintaining the health and safety of King County residents and to implementing the Regional Growth Strategy in a way that aligns to local policy direction and development constraints and opportunities.</td>
</tr>
<tr>
<td><strong>Sewage Treatment and Disposal</strong></td>
<td>Within the Urban Growth Area, connection to sanitary sewers is necessary to support the Regional Growth Strategy and to accommodate urban densities. Alternatives to the sanitary sewer system and the typical septic system are becoming more cost effective and therefore, more available. Alternative technology may be appropriate when it can perform as well or better than sewers in the Urban Growth Area. <strong>Acceptable on-site sewage systems may be selectively considered appropriate as alternative technology within the Urban Growth Area.</strong> In the Rural Area and Resource Lands, which are characterized by low-density development, sewer service is not typically allowed. In cases where public health risk is documented, sewers can be provided in the Rural Area but only if on-site sewage systems are infeasible (for example, due to physical constraints) and public sewer system connections are strictly limited.</td>
</tr>
<tr>
<td><strong>PF xy (new proposed)</strong></td>
<td>Ensure sufficient interagency and cross-jurisdictional collaboration on sub-basin and neighborhood scale planning on land use, clean water, and sewerage that results in utility development strategies that reconcile policy guidance and physical constraints. Coordinate the provision of meaningful support, guidance, and resources for property owners seeking clarity on development potential.</td>
</tr>
<tr>
<td><strong>PF-11</strong></td>
<td>Require all development in the Urban Growth Area to be served by single-family residences on existing individual lots that have no feasible access to sewers may utilize individual septic systems on an interim basis; or development served by alternative technology other than septic systems that provide equivalent performance to sewers;</td>
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Additions intend to drive smaller scale planning that is needed. Proposed new policy that addresses need to more granular planning, which includes sewer connections or on-site capacities. Reinforces that there are options for how to deal with sewage, with the best approach reconciling to zoning, landscape,
provide the capacity to achieve planned densities; and will not create a barrier to the extension of sewer service within the Urban Growth Area. the appropriate wastewater system approach, which may include sewers, large on-site sewage systems, or on-site sewage treatment system. Considerations may include soils, location, and proximity to sewer connections, along with land use objectives. Ensure maintenance that supports proper function of all systems as designed.

<table>
<thead>
<tr>
<th>PF-X2</th>
<th>Consider climate change, economic, and health <strong>equity</strong> impacts when siting and building essential public services and facilities.</th>
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<tr>
<td>PF-17</td>
<td>Provide human and community services to meet the needs of current and future residents in King County communities through coordinated, <strong>equitable</strong> planning, funding, and delivery of services by the county, cities, and other agencies.</td>
</tr>
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</table>
May 5, 2021

Karen Wolf, FAICP
King County Regional Planning Division
Chinook Building
401 5th Ave Ste 810
Seattle, WA 98104

Subject: Comments on Draft King County Countywide Planning Policies

Dear Ms. Wolf,

Thank you for providing draft revisions of the King County Countywide Planning Policies (CPP) for public review. We appreciate the thoughtful work the Interjurisdictional Team, Growth Management Planning Council, cities, and county have done to update the CPPs and draft growth targets for consistency with VISION 2050 and to support the next round of local plan updates.

Thank you also for using the draft reporting tool to help guide the CPP review process and to document how the draft CPPs are consistent with key provisions in VISION 2050. In addition to the reporting tool, PSRC’s guidance to align growth targets with VISION 2050 may be a useful reference. The comments below consider the draft policies in the context of the reporting tool and PSRC guidance. The county and its cities have engaged in a thorough and collaborative review of the draft policies and have addressed the key concepts in VISION 2050, which will serve local governments well as they update comprehensive plans.

The King County Countywide Planning Policies serve an important role in bridging regional policy to local planning, and the update does an excellent job responding to new policy direction. The draft policies work to advance several of the expanded policy areas in VISION 2050, including addressing racial and social equity and reducing disparities, which are critical issues for today.

Like VISION 2050, the update expands on the effort to reduce greenhouse gas emissions and address climate change. It underscores a commitment to support housing production, especially affordable housing, and to address discrimination and disparities in access to housing. And the draft takes important steps to facilitate the completion of annexation of urban unincorporated areas and maintaining stability of the urban growth boundary through revisions to the Four to One program.

The countywide planning policies play a critical role in implementing VISION 2050’s Regional Growth Strategy and the Regional Centers Framework and the draft makes important advancements, including coordinated planning for growth and the ability to designate countywide centers. The draft countywide growth targets support implementation of the Regional Growth Strategy through
accommodating significant growth in Metropolitan Cities, Core Cities, and High Capacity Transit Communities. Consistent with VISION 2050, the targets allocate a larger share of housing growth to Metropolitan Cities.

As the update of the countywide planning policies continues, we recommend addressing a few additional topics prior to adoption:

**Coordination with Tribal Nations**

- VISION 2050 includes several new and updated policies emphasizing the role of tribal nations in regional and local planning. We recommend working with your local tribes to address tribal coordination, impacts on tribal lands, and the economic role of tribes (MPP-RC-1, MPP-DP-7, MPP-Ec-15).

**Growth and Development Patterns**

- VISION 2050 includes a goal for 65% of the region’s population growth and 75% of the region’s employment growth to locate in regional centers and near high-capacity transit. The draft policies already include extensive discussion of the role of designated centers. However, they would benefit from additional discussion and policy on the role of other transit station areas and transit-oriented development beyond designated centers.

- The county and its cities are commended for the collaborative and transparent approach to developing growth targets that implement the Regional Growth Strategy. The targets make important progress to implement VISION 2050, but there are additional areas the cities and county should consider:
  - The draft employment targets are about 28,000 lower than expected under VISION 2050 for Core Cities and 3,500 lower for High Capacity Transit Communities. To demonstrate consistency with VISION 2050, we recommend aligning the growth allocations for each group of cities with VISION 2050 unless there are specific reasons that growth would be front-loaded or back-loaded for a given geography. The region has a goal for 75% of employment growth to be located in centers and station areas to help make jobs more accessible and to improve transportation options. Employment near transit and in centers is critical for achieving robust growth in centers, providing access to opportunity, and maximizing transit access to work. PSRC acknowledges the near-term uncertainty with employment due to COVID, but King County and its cities should work to close the gap and allocate sufficient employment growth to Core Cities and High Capacity Transit Communities during this planning horizon. Cities with regional growth centers have a special responsibility under VISION 2050 to accommodate new growth, and providing sufficient capacity and planning for employment is a key role for regional centers.
  - The draft numbers consolidate growth targets for urban unincorporated areas with their associated free-standing cities. Coupled with higher housing targets for Cities & Towns than allocated under VISION 2050, this raises questions about consistency with VISION 2050 and how much growth is allocated to both Cities & Towns and Urban Unincorporated areas. We would like more information to better understand the allocation of targets between the two geographies. The housing targets for Cities & Towns should be in alignment with the Regional Growth Strategy or a clear explanation

2
of why the growth is front-loaded or back-loaded should be provided. It is difficult to assess the consistency due to the way the targets for the cities and the unincorporated areas are combined.

- Existing and planned access to high-capacity transit underpins the Regional Growth Strategy in VISION 2050. Some investments have already come online, while others will happen later in the planning period. PSRC recognizes many communities in King County have stepped up to accommodate significant new growth through 2044. For some cities, however, the growth targets don’t appear to take advantage of the opportunities for growth associated with transit connections, particularly light rail service. Beyond existing capacity and previous targets, VISION 2050 anticipates a new role some cities will play in equitably accommodating growth near transit investments in the 2044 growth targets.

**Equity**

- Engagement though the planning process is critical to advancing racial and social equity. The draft countywide planning policies should consider how to address equitable engagement, consistent with MPP-DP-8.

**Climate Change**

- VISION 2050 calls to prioritize transportation investments that reduce greenhouse gas emissions (MPP-CC-11-12). While many of the policies generally encourage alternatives to driving alone and the CPPs support action on climate change, the the CPPs could address these policies more specifically.

**Minor change:**

- Recommend updating DP-11b to reference “high-capacity transit station areas.” Some readers may confuse the current language with the High Capacity Transit Communities, a regional geography in the VISION 2050 Regional Growth Strategy.

As you approach completing revisions to the CPPs and growth targets, we are glad to continue to work with you and are available to provide additional review. PSRC has resources on our website, including an overview of differences between VISION 2040 and VISION 2050 and a detailed matrix of multicounty planning policy changes.

We are impressed with the meaningful work that has been invested in the project and the quality of the public review draft. The countywide group has done great work and the draft policies and targets show important progress towards implementing the vision for the central Puget Sound region.

If you have questions or would like additional information, please contact me at PInghram@psrc.org or Liz Underwood-Bultmann at LUnderwood-Bultmann@psrc.org.

Sincerely,

**Paul Inghram**

Paul Inghram, FAICP
Director of Growth Management Planning
May 5, 2021

Members, King County Growth Management Planning Council
GMPC@kingcounty.gov

RE: Comments – 2021 Update to the Countywide Planning Policies

Dear Members of the Growth Management Planning Council:

The King County Component of the Puget Sound School Coalition1 (the “School Coalition”) submits these comments on the 2021 draft update to the King County Countywide Planning Policies (the “2021 CPP Update”). King County population is expected to grow by more than 600,000 people by 2044. Growth affects school districts uniquely by increasing student enrollment and related facility needs but reducing the already constrained areas available and suitable for new school infrastructure siting. This is particularly true in King County where developable land is restricted to the Urban Growth Area (UGA), making locational choices for siting schools both scarce and dramatically more expensive.

The School Coalition members, as well as other school districts throughout King County, now more than ever require the assistance of government partners to provide needed school capacity to serve existing and growth-related enrollment. The GMPC’s 2012 adoption of the King County School Siting Task Force recommendations as well as the existing CPP Policies PF-18 and PF-19, and King County’s subsequent related amendments to the King County Comprehensive Plan and King County Code, restrict new schools, with certain limited exceptions, to sites within the UGA boundary. Since these changes, several school districts have struggled to find developable school sites located and/or to permit those schools in an efficient and cost-effective manner. Where available, the sites are more expensive, more complex and challenging, contain various development constraints requiring more land and/or more expenditure of public funds, require comprehensive plan/rezone or zoning code amendments, are not always located ideally near school populations, or include some combination of all of the above2. As a result, there may soon be a critical shortfall in required school capacity. The School Coalition desires to find collaborative solutions with its government partners to avoid this scenario.

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1 The King County Component of the Coalition includes the Issaquah, Lake Washington, Northshore, Riverview, Snoqualmie Valley, and Tahoma School Districts, all with school district boundaries including both incorporated and unincorporated portions of King County and some with the majority of their district’s land base outside of the UGA boundary.
2 Costs and challenges generally increase with acquisition by eminent domain (which is not a preferable tool and often infeasible).
The GMPC’s forward thinking efforts in 2016 to adopt CPP Policy PF-19A, facilitating cooperative planning between school districts and the jurisdictions they serve, is a proven mechanism for the sharing of information and challenges. The process is a precursor to the recently adopted Vision 2050 MPP-PS-26, which directs jurisdictions to “[w]ork cooperatively with school districts to plan for school facilities to meet the existing and future community needs consistent with adopted comprehensive plans and growth forecasts[.]” The School Coalition views the proposed revisions to CPP Policy PF-19A in the 2021 CPP Update as necessary clarifications to the process itself and appreciates the GMPC’s recommitment to the PF-19A process. We also appreciate that the proposed revised Policy DP-3 appropriately recognizes that jurisdictions must coordinate planning for schools in the same way they do for other required public infrastructure.

However, even with the Policy PF-19A process, the Growth Management Act obligation to ensure adequate school infrastructure will only be possible consistent with the regional policy choices made in 2012 if jurisdictions, working with their school districts, take focused actions toward proactive and innovative school site planning, changes to zoning and design standards to facilitate school siting, and prioritization of school permitting as necessary public infrastructure. Motion 18-1, as adopted by the GMPC and ratified accordingly in 2019, urges such action. While some cities were ahead of the curve or have moved in the direction toward elements of Motion 18-1, not every jurisdiction has done the same. The GMPC should consider additional action-forcing mechanisms to elevate school siting and permitting as a priority in all jurisdictions.

School siting is at a critical point in King County. The coming years will be telling in several school districts as to whether or not they are able to meet existing enrollment needs at adopted educational programmatic standards. Where this does not occur, GMPC corrective action, as required by PF-19A, will be needed and expected.

We appreciate the opportunity to submit these comments and look forward to continued participation in the 2021 CPP Update process.

Sincerely,

PACIFICA LAW GROUP LLP

[Signature]

Denise L. Stiffarm

cc: Members, Puget Sound School Coalition – King County Component
Jason Refsland, jason.refsland@gmail.com

In the draft matrix I only see a rural town reference in PF-19. I propose that there's a clarification of intent to include Rural Town Areas under the same guidelines as Rural Areas unless otherwise noted.

DP-46 does not mention density limits for Rural Town Areas. Please clarify density goals/restrictions for Rural Town Areas.

MPP-RGS-13 does not differentiate between Rural Areas and Rural Town Areas. Rural town areas should be considered as the preferred place to serve Rural Area residents. Don't kill our Rural Town Area businesses by forcing their move to neighboring cities.

Thank you for your consideration.

Jason Refsland
Resident Fall City, WA
May 5, 2021

Executive Dow Constantine  
Chair, Growth Management Planning Council 
King County Office of Performance, Strategy and Budget

Dear Executive Constantine and members of the GMPC,

Thank you for your leadership in guiding the development of countywide planning policies that directly address so many of our region's most pressing issues. King County staff along with staff in all its jurisdictions have dedicated the past couple of years toward analyses and policy development that reflect the county's best thinking on these issues.

Yet, King County's housing growth target falls about 15 percent below what is needed to house the population growth associated with King County's job growth target. By adopting the proposed housing growth target, King County will house about only 85 percent of the population associated with the number of jobs it is planning for. The remaining 15 percent will need to look for housing outside of King County, or they will displace people who are living within the county today. Currently, King County has a shortage of housing. By adopting a housing growth target that fails to house the population growth associated with new jobs, King County will increase the shortage of housing digging itself into an even deeper hole of housing deficit.

Given today's crises of housing affordability, equity and climate change, King County has a moral imperative to adopt a housing target that at a minimum does no harm. The proposed housing target would increase the shortage of housing and thereby increase demand which would result in increased housing prices, less housing affordability, greater risk of displacement, increased long commutes, greater congestion and increased greenhouse gas emissions. County dollars dedicated to developing affordable housing would also have less impact resulting in fewer affordable homes being built.

Ideally, King County would adopt a housing target that would shrink the housing shortage by planning to house all the population associated with projected job growth plus a greater proportion of households who live outside the county currently and commute to work inside. At a minimum, King County's housing growth target should be equivalent to housing 100 percent of the population growth associated with its job growth target to avoid worsening the county's shortage of housing.

Thank you for your thoughtful consideration.

Sincerely,

Gwen Rousseau

King County resident
Re: Comments on King County Draft Countywide Planning Policies and Growth Targets

Dear Growth Management Planning Council,

The Sierra Club asks for your active support of infrastructure investment and policies that directs more of our expected growth into transit-rich areas. Correspondingly, we support actively reducing new infrastructure investment in areas that are not accessible to transit or are far from the PSRC Vision 2050 growth centers. A more equal housing-jobs balance is needed.

Some specific comments on the draft Countywide Planning Policies follow.

Draft Policy DP-2 is proposed as follows:

Accommodate housing and employment growth first and foremost in cities and centers within the Urban Growth Area, where residents and workers have higher access to opportunity and high-capacity transit. Promote a pattern of compact development within the Urban Growth Area that includes housing at a range of urban densities, commercial and industrial development, and other urban facilities, including medical, governmental, institutional, and educational uses and schools, and parks and open space. The Urban Growth Area will include a mix of uses that are convenient to and support public transportation in order to reduce reliance on single occupancy vehicle travel for most daily activities.

We support this policy’s focus on growth in areas with both transit and opportunity. Reducing reliance on single occupancy vehicles, by increasing the use of transit and the use of active transportation will reduce emissions, reduce stormwater pollution, improve health, and economic well-being. Active transportation helps connect us to the earth and other people.

However, the second and third sentences of draft policy DP-2 can allow unintended consequences that are counter-productive to improved transit and would result in environmental harm and increased infrastructure costs. After a direct and specific initial sentence, the remainder of the policy is overly broad in its support of any and all development inside the Urban Growth Area. Promoting the listed land uses and “compact development within the Urban Growth Area” would lead to unsustainable growth in suburban areas that lack high capacity transit and are not near our existing growth or economic centers. This is in consistent with Multi-County Planning Policy MPP-RGS-121. DP-2 should be modified to emphasize that growth occurs in close proximity to centers of opportunity and where frequent, reliable transit can connect residents to those centers.

Investing in transit and focusing growth in transit-oriented areas reinforces its importance, leading to more frequent and faster transit. This will have a positive impact on equity for lower income or historically underserved communities that use transit. While serving the needs of lower income

1 MPP-RGS-12: “Avoid increasing development capacity inconsistent with the Regional Growth Strategy in regional geographies not served by high-capacity transit.”
households is vitally important, transit is for everyone, and has the ability to make our cities drastically more livable. Cities should not be designed for cars, they should be designed for people!

The GMPC must set growth targets pursuant to policy DP-12, and draft targets are provided on page 22 and 23 of the Proposed 2021 Countywide Planning Policies. The GMPC should adjust some of the draft growth targets because they are inconsistent with policy DP-2 and other goals set out in the MPP's and by the Countywide Planning Policies.

- Seattle and Bellevue have significant housing targets, but even larger job targets. Given that jobs in these cities already greatly outnumber housing, this is a problem that will lead to more single occupancy vehicle commuting. These metropolitan cities, particularly Bellevue, should have housing targets increased to come closer to job growth. Housing targets for cities that have very limited or almost no transit should be reduced.
- Areas near Seattle and Bellevue that have access to transit and economic opportunity have growth targets that are too limited— the sprawling cities of Hunts Point, Yarrow Point, Clyde Hill, and Medina should have increased housing targets and incentives to provide their share of affordable housing. It is worth noting that portions of Clyde Hill are within walking distance of the opportunity center of downtown Bellevue.
- Cities and towns in Southeast King County— Covington, Maple Valley, Black Diamond, and Enumclaw— have very high housing targets, but do not have very much transit service. There is also no funding plan to add any transit that will have a meaningful reduction in single occupancy vehicles in these areas. Covington and Maple Valley have experienced suburban retail and housing development at high rates for decades in patterns that are not suitable for transit. The roads and intersections in those areas have repeatedly been subjects of requests for state and County investment for widening. This situation worsens each year. These cities should all have reduced housing targets from what is proposed.
- The job and housing targets for both North Bend and Snoqualmie should be reduced, as they can be expected to contribute to sprawl in areas where almost no one will use transit for commuting, and where growth will have disproportionate negative impacts on natural areas.
- The housing target for Shoreline should be modified as it also stands out as very high. The regional light rail line to soon serve the city could prompt a shift in travel mode away from personal vehicle traffic, but the type and location of the housing and related multi-modal investments will affect how this growth occurs. The housing target should be reduced to Shoreline’s job target initially, with an increase conditional on transit service and active transportation investments that can support more residents without adding to city VMT.

These CPP policies appear to express great concern that cities will not achieve their Growth Targets, but no concern for cities that grossly exceed their Growth Targets, thereby exerting undue pressure on King County infrastructure and worsening the geographic imbalance of jobs and housing. We are quite concerned about cities shifting housing Growth Targets from cities that didn’t want more (e.g., Sammamish) to cities that did want more (e.g., Black Diamond and Covington), especially because those increasing their housing targets lack the infrastructure to accommodate that growth. In addition to worsening the overburdened transportation system on the fringes of the urban area, this will likely cause the entire County to not achieve its total housing Growth Target.

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New Policy T-X2 is proposed as follows:

*Prioritize transportation investments that provide and encourage alternatives to single occupancy vehicle travel and increase travel options, especially to and within centers and along corridors connecting centers.*

While we support this policy to increase travel options within and between growth centers, the policy should also specifically call out the need to meet state targets for greenhouse gas (GHG) emission reductions and vehicle miles traveled reductions in support of climate resiliency and more efficient land use patterns. Transportation investments need to be directed in ways that meet these reduction targets if we are to have reasonable success in meeting them.

New Policy T-X4 is proposed as follows:

*Implement transportation programs and projects that promote access to opportunity for Black, Indigenous, and people of color, people with low and no-incomes, and people with special transportation needs.*

This is a laudable policy, but the metric of access to opportunity should be used to evaluate service decisions of the public transit network and demonstrate its value to the entire County. The transit system’s ability to enable people to reach their destinations, with particular emphasis on employment and schooling locations and passengers of low income or historically underserved, is a very useful measure for its success.

Revised Policy T-8 is presented to read:

*Prioritize state, regional and local funding to transportation investments that support countywide growth targets and are focused on multi-modal mobility and safety, equity, and climate change goals, as well as centers (local, countywide and regional) where applicable.*

Insert “federal,” prior to “state”. We urge this policy to emphasize the need for meeting climate change goals, consistent with both the County Strategic Climate Action Plan and the GHG emission reduction objectives codified in RCW 70A.45.020. Growth targets must be supportive of our climate goals.

New Policy T-X7 is proposed as follows:

*Determine if capacity needs can be met from investments in transportation system operations and management, pricing programs, transportation demand management, public transportation and system management activities that improve the efficiency of the current transportation system, prior to implementing major roadway capacity expansion projects. Focus on investments that produce the greatest net benefits to people, especially communities and individuals where needs are greatest, and goods movement that minimize the environmental impacts of transportation.*

The need for reducing VMT and GHG emissions from the transportation sector must be factored in to this assessment of system management as an alternative to capacity expansion projects. Proper weighting of the climate and environmental objectives is likely to rule out any major roadway expansion projects, so system management approaches will have to remedy the “need” for capacity.

New Policy T-X8 is proposed as follows:

*Promote coordination planning and effective management to optimize the movement of people and goods in the region’s aviation system in a manner that minimizes health, air quality, and noise impact to the community, especially frontline communities.*
demand management alternatives as future aviation growth needs are analyzed, recognizing capacity constraints at existing facilities and the time and resources necessary to build new ones.

A recognition of the obligation to minimize health, air quality, and noise impacts from aviation is long overdue. Demand management alternatives should include upgrades to the passenger and freight rail system to enable short-flight distance travel to shift to trains that provide frequent and reliable service at higher speeds along improved rail corridors. Multi-modal freight facilities and re-localized economies can reduce the need for future aviation growth.

Revised Policy T-17 is presented to read:

*Promote the use of pricing strategies and transportation system management and operations tools to effectively manage the transportation system and provide an equitable, stable, and sustainable transportation funding source to improve mobility.*

User fee based pricing methods will become essential to provide for basic system maintenance and operation as the vehicle fleet transitions to electric power and the revenue generated by existing fuel taxes declines. System management tools are needed to ensure continued mobility and financial support of the transportation system. Pricing strategies to affect decisions about when and where to travel should apply to all users, with low income users provided discounts that address the income effect without eliminating the substitution effect of relative pricing on individual decisions. Pricing strategies should also account for user impact on the system, such as recognition of the non-linear increase in roadway wear and tear with increasing vehicle weight.

**Summary**

Where we grow and how close this growth is located to transit has an enormous impact on our future infrastructure investments. Will transit be sustainable and fast? Or, will motor vehicles be given priority with negative environmental and safety impacts from centering automobility? Will our cities be designed for people, or will growth be accompanied by ever-expanding roads and parking lots?

The most effective way to improve transportation and reduce its costs is through better land use decisions. Integration of land use and the transportation system will make each more efficient, effective, and pleasant to experience day by day. Growth targets should direct activity where transit is robust. The region should strive for better jobs-housing balance. Finally, if we are to maintain a recognizable climate, the growth patterns and transportation policies must reinforce, and not contradict, our climate goals.

Thank you for your consideration.

Sincerely,

Sierra Club Washington Chapter Transportation and Land Use Committee
Tim Gould, Chair
SVPA Public Comment – 2021 CPP Update

May 4, 2021

Growth Management Planning Council
Attn: Karen Wolf, Senior Policy Analyst
Office of Performance, Strategy and Budget
Karen.wolf@kingcounty.gov
206-263-9649
3401 5th Avenue, Suite 800
Seattle, WA 98104

On behalf of the staff and board of directors of the Snoqualmie Valley Preservation Alliance (SVPA), please accept the following comments in response to the King County 2021 CPP Update, GMPC Approved Public Review Draft - Proposed 2021 Countywide Planning Policies.

SVPA’s mission is to advocate for the resource lands of the Snoqualmie Valley, and we feel an organizational investment in continued monitoring of Countywide Planning Policies (CPP) is a necessary component of our mission. SVPA will continue to monitor planning updates and comment when necessary, and we look forward to working with King County officials and representatives where collaboration is appropriate.

SVPA recognizes that the CPP must address a growth framework for a wide variety of stakeholder groups, which creates a necessarily broad body of policies and actions. SVPA also recognizes the CPPs create the framework for the Comprehensive Plan. SVPA maintains that often, due to the broad nature of policy goals, CPP policies and Comprehensive Plan policies may compete at the scale of individual projects or land parcels. SVPA asserts that the Fish, Farm, Flood (FFF) Advisory Committee was formed to assist in balancing planning policies and goals in the Snoqualmie Valley, and the SVPA intends to utilize the FFF process to move projects forward and/or make recommendations in areas where broad planning policies may create tensions from competitive interests and goals.

SVPA reaffirms its commitment to protecting agricultural lands in the Snoqualmie Valley, as well as its commitment to participating in the FFF Advisory Committee.

Thank you for considering our comments regarding the 2021 CPP Update.

Sincerely,

Marie Shimada, Executive Director
May 10, 2021

Karen Wolf, FAICP
Senior Policy Analyst
Performance, Strategy and Budget
(Karen.wolf@kingcounty.gov, GMPC@kingcounty.gov)

Dear Ms. Wolf:

RE: Draft 2021 King County Countywide Planning Policies

Thank you for the opportunity to review the Draft 2021 King County Countywide Planning Policies (CPPs). We appreciate County staff’s efforts and collaborative approach in working with us to establish our desired housing and jobs growth targets for 2044. Overall, we support the intent of the CPPs and many of the policy changes that steer the County towards greater social equity and environmental stewardship. However, we have concerns on several of the draft policies, as follows (2021 CPP numbers are referenced):

1. County and State Obligations Towards Unincorporated Roadway Network
   In 2019, the City submitted comments for the draft Puget Sound Regional Council’s (PSRC) VISION 2050 Plan that expressed our overall support for the intent of the Plan and that a regional growth strategy as a whole is a useful and important tool. However, the policies in the draft Plan do not adequately represent small cities, especially those in the Snoqualmie Valley. In our comment letter to PSRC, we expressed concerns about policies that discouraged or limited growth in small cities. To our dismay, many policies directing growth and infrastructure investment away from small cities were subsequently adopted in VISION 2050. While we understand that updates presented in the draft CPPs seek alignment with VISION 2050 Plan, and while we are supportive of measures to curb sprawl in unincorporated Rural Areas, we are ever more concerned and in disagreement with policies that restrict infrastructure improvements in Rural Areas that surround and serve small cities such as ours.

   As our City is surrounded by Rural Area, our residents must rely on the unincorporated road network and State Routes 202 and 203 for commuting to employment and commercial centers. In the past, King County and Washington State Department of Transportation (WSDOT) have not invested in improvements to the unincorporated road network serving Carnation, and as a result, we are experiencing declining levels of service and unsafe conditions at key road intersections that connect our residents to other urban areas.

   As King County and WSDOT have failed to uphold the obligation to provide safe and efficient transportation infrastructure for our residents, we object to the elements in policies DP-11, DP-13, DP-X5, DP-45, DP-47, T-2, and PF-1 that could further limit investment in transportation...
infrastructure in Rural Areas. In particular, we are strongly opposed to the first sentence in Policy T-2, which states: “Avoid construction of major roads and capacity expansion on existing roads in the Rural Area and Resource Lands.” Carnation relies heavily on roads crossing and adjacent to Rural Areas and State Routes 202 and 203 to get in and out of our City. Avoiding any capacity improvements on these roads would severely impede traffic safety improvements and the ability to increase capacity and level of service for existing impacted intersections in and adjacent to Rural Areas that serves our City. We request that this first sentence be deleted. If additional controls are needed to limit growth in unincorporated Rural Areas, King County should implement those controls while still meeting the obligation to provide safe and efficient transportation infrastructure to residents living in Urban Growth Areas.

2. Public Transit Requirement for Annexations
We are supportive of the pre-annexation agreement in the policy updates for DP-23 and DP-25. However, we are concerned that these policies seek alignment with VISION 2050 MPP-DP-29, which only supports annexation if it is supported by urban infrastructure and served by public transit. Carnation lacks public transit as the only “mass transit” available to us is limited to the regional Snoqualmie Valley Transit shuttle serving small cities in the Snoqualmie Valley. We do not want any criteria that would impede our ability to annex unincorporated areas within our Urban Growth Area due to a lack of public transit as part of the bundle of urban services that is the prerequisite to annexation.

3. Capital Improvement Plans and Adopted Growth Targets
Item (d) in policy DP-13 requires that “adopted local water, sewer, transportation and other infrastructure plans and investments...are consistent with adopted targets as well as regional and countywide plans.” Adopted targets are not within the local jurisdiction’s control as they are ultimately approved by the County’s Growth Management Plan Council and County Council. Tying adopted targets to local infrastructure plans and investments would: 1) require cities to tie infrastructure plans to adopted targets that are not within the cities’ control, and 2) limit the sizing of infrastructure improvements to adopted 20-year targets, impeding cities’ ability to plan for future needs beyond the adopted targets.

Sincerely,

Robert Jean
Interim City Manager
May 12, 2021

Ms. Karen Wolf
King County Executive Office
Chinook Building
401 5th Ave Ste 810
Seattle, WA 98104

Dear Ms. Wolf:

Thank you for the opportunity to comment on the 2021 update of the King County Countywide Planning Policies (CPPs). The City of Issaquah has reviewed the draft policies and is supportive of most proposed changes. The City has comments related to the school siting policies PF-18, 19, and 19A. We understand these three policies were originally added with the last major update to the CPPs. However, we would like to reiterate our concerns and hope the policies are revised so that they lay the foundation to allow for creative solutions to this complex issue of siting schools.

The City of Issaquah and the Issaquah School District (ISD) are in a unique position, serving population in both urban and rural area. The Issaquah School District is 110 square miles. Only approximately 31 square miles are located within incorporated cities and in the Urban Growth Area (UGA); the remaining area is rural and located outside of the UGA. The City of Issaquah makes up only 12 of the 110 square miles. See attached map.

Given our unique geographic location, the City has concerns regarding policy PF-19. This policy states that, except for Pierce County (RCW 36.70A.211), new schools and institutions primarily serving rural residents must be located in neighboring cities and rural towns. Policy PF-19 requires that the ISD locate schools in a much smaller geographical area than the area for which it provides educational services. The City of Issaquah is not equipped to provide infrastructure or land area necessary to accommodate future schools for the entire 110 square miles. The practical reality is that Issaquah cannot fit the necessary future schools within our 12 square mile city.

Both policies (PF-18 and PF-19) do not specifically address situations where schools serve both urban and rural areas, such as Issaquah. Additionally, a reference to RCW 36.70A.211 (exception for Pierce County) is incorporated, however RCW 36.70A.213 is not. It is our understanding from the attached handout prepared by the Department of Commerce that RCW 36.70A.213 authorized counties, in certain circumstances, to extend utilities to schools located outside the urban growth areas that serve both rural and urban areas.
Furthermore, the third policy (PF-19A) that outlines the reporting requirements for King County should be more explicit. The report that King County will prepare every two years to provide to GMPC should assess how the goal of minimizing travel time stacks up for all schools.

The City supports the goal of locating schools that reduce travel distances, minimizes environmental impacts, and allows students to walk and bike to school. However, the proposed policies are not going to help build schools close to students or meet the goals listed above. As the Puget Sound Region prepares to accommodate 160,000 additional students by 2050 and comply with the Regional Growth Strategy of accommodating growth in urban centers, the siting of major public facilities like schools will become increasing difficult. It is critical that the proposed CPPs lay the foundation for thoughtful and coordinated approach that is flexible and accommodates the unique needs and geographies that straddle urban and rural areas.

Thank you again for the opportunity to review and for your consideration in this matter.

Sincerely,

Minnie Dhaliwal

Minnie Dhaliwal
Director, Community Planning & Development

Cc: Mayor Mary Lou Pauly
    Wally Bobkewicz, City Administrator
    Christen Leeson, Senior Planner
    Thomas C Mullins, Issaquah School District
The Siting of School Facilities and the Growth Management Act

2017 School Siting Law: Frequently Asked Questions

1. Overview

Two bills passed during the 2017 legislative session affect how certain new schools may be sited outside urban growth areas, and how public facilities and utilities may serve those schools. ESHB 1017 and HB 2243 were codified as RCW 36.70A.211 and .212, specifically for Pierce County, and RCW 36.70A.213 applies to all counties planning under the Growth Management Act (GMA).

To set the context, the GMA goals that encourage compact urban growth and discourage sprawl point to urban growth areas as preferred locations for siting schools, but the GMA does not prohibit schools in rural areas. The GMA defines schools as “public services”, but does not define schools as either an “urban service” or a “rural service.” The GMA also allows a wide variety of rural governmental services1, such as domestic water systems, in rural areas. However, the GMA does not allow urban governmental services2, specifically sanitary sewer service, to be extended to or expanded in rural areas, except in the limited circumstances discussed later in this guidance.

RCW 36.70A.213 now allows counties to authorize the extension of public facilities and utilities, specifically sewer service, beyond urban growth area boundaries to serve a school sited in a rural area that serves students from a rural area and an urban area. These extensions are authorized only if the requirements in the statute are met, and there is agreement among the school district, the county, affected cities, and if required, utility providers. Such school proposals must comply with local comprehensive planning and project approval processes.

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1 RCW 36.70A.030 (18) "Rural governmental services“ or “rural services“ include those public services and public facilities historically and typically delivered at an intensity usually found in rural areas, and may include domestic water systems, fire and police protection services, transportation and public transit services, and other public utilities associated with rural development and normally not associated with urban areas. Rural services do not include storm or sanitary sewers, except as otherwise authorized by RCW 36.70A.110 (4).
2 RCW 36.70A.030 (20). “Urban governmental services” or “urban services” include those public services and public facilities at an intensity historically and typically provided in cities, specifically including storm and sanitary sewer systems, domestic water systems, street cleaning services, fire and police protection services, public transit services, and other public utilities associated with urban areas and normally not associated with rural areas.
2. Who is the intended audience for this guidance?

The guidance is intended to provide basic information to county and city officials on the new
GMA provisions relating to siting schools in Pierce County. It also is intended to provide
information to county and city officials regarding access to public facilities and utilities, if the
school is located outside urban growth areas in any part of the state. Another audience is
school district officials as they consider potential locations for new schools. This guidance is
designed to provide information about the law within the context of existing GMA provisions.
*Text in italics is statutory requirements of the GMA.* Other text includes suggestions and
recommendations of best practice.

3. What is already required for the siting of schools?

The GMA already required that schools be considered as communities are being planned, and
specifically considered when permitting large developments. First, the GMA requires that
when urban growth areas are designated, *each city within the county must include areas
sufficient to accommodate the broad range of needs and uses that will accompany the
projected urban growth, including, as appropriate, medical, governmental, institutional,
commercial, service, retail, and other nonresidential uses.* In addition, the land use element of
a comprehensive plan should identify *the general distribution, and general location, and extent
of the uses of land,* including public facilities. The GMA also requires counties and cities to
identify *lands useful for public purposes, such as schools.* In addition, as part of subdivision
approval, permitting jurisdictions must ensure *appropriate provisions are made for schools and
school grounds.* If school impact fees are collected, a jurisdiction’s capital facilities element
must address school facility needs related to growth.

The Office of the Superintendent of Public Instruction (OSPI) recommends that school districts
review local land use plans, population projections, and development trends to analyze how
anticipated development could affect projections for future student populations. Commerce
encourages cities and counties to work with school districts to review the relationship of
school district enrollment projections with local population growth projections. For school
construction projects that receive state school construction funding assistance, planning for a
school should be a part of a district’s long-range capital plan, and the OSPI Study and Survey,

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3 RCW 36.70A.110(2)
4 RCW 36.70A.070(1)
5 RCW 36.70A.150, it also states that the *county shall work with the state and the cities within its borders to identify areas of shared need for public facilities....and shall prepare a prioritized list of land necessary for the identified public purposes.*
6 RCW 58.17.110
7 RCW 82.02.050, RCW 82.02.090(7).
8 School Facilities Manual: School Construction Assistance Program (2011), Section 305

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consistent with OSPI requirements. This document is required prior to submitting any application for state assistance on a major capital K-12 project.

4. Under the new law, what is the process for siting a school outside the urban growth area (UGA) and extending public facilities and utilities to the school?

**RCW 36.70A.213** does not prohibit a county planning under RCW 36.70A.040 from authorizing the extension of public facilities and utilities to serve a school sited in a rural area. However, RCW 36.70A.213 has the following requirements to authorize the extension of public facilities and utilities to serve a school sited in a rural area that serves students from a rural area and an urban area:

A. **School District Policy:** The school district board of directors has adopted a policy addressing school service area and facility needs and educational program requirements. This policy may include criteria for siting schools, school grade configuration, educational programming, recreational facility co-location, feeder schools, transportation routes, or other relevant factors that may affect school siting decisions.

B. **School District Action to Select the Site:** The applicable school district has made a finding that the district’s proposed site is suitable to site the school. The finding should also address any associated recreational facilities which the district has determined cannot reasonably be collocated on an existing school site, taking into consideration the school district policy (adopted above), and the extent to which vacant or developable land within the growth area meets those requirements. Playgrounds and fields associated with activities during the normal school day (e.g., recess and physical education) are expected to be a part of planning for new, expanded or modernized school sites. Shared use of recreational facilities may be considered as part of the proposal.

Though it is not required, Commerce recommends that the district include, as part of its findings, the policies used to make the site selection, cost considerations, or other relevant information that can help support city and county concurrence of the school district’s finding.

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9 The Washington State School Directors Association (WSSDA) develops model policies for school district consideration; policy 6900 addresses facilities planning. Policy 6905 addresses site acquisition.

10 See, for example, advisory school sizing guidance from OSPI (WAC 392-342-020).

11 **RCW 36.70A.213 (1)(b).**

12 See MRSC’s web page on parks and recreation partnerships and agreements at mrsc.org/Home/Explore-Topics/Parks-and-Recreation/Partnerships-and-Agreements/Intergovernmental-Cooperation-in-Parks-and-Recreat.aspx

13 For example, under existing rules, the school district must obtain written approval from the county health officer that the site presents no health problems and avoids, or identifies and mitigates, natural and manmade hazards, such as air pollution and noise (WAC 246-366-030).
C. **Concurrence by the County and Affected Cities:** The legislative authority of the county and any affected cities\textsuperscript{14} review the school district’s finding and may concur with those findings in the form of a resolution or other legislative action. Though the legislation does not provide guidance on how concurrence should occur, Commerce recommends the county and affected cities base their decisions on the school district’s documentation, relevant policies in the county or city comprehensive plan or countywide planning policies\textsuperscript{15}, and the ability to extend public facilities and utilities. If a county or affected city concurs with the school district’s finding, the county and any affected cities should also at that time agree to the extension of public facilities and utilities to serve the school.

If a county or affected city finds that it cannot concur with the school district’s findings regarding the proposed school, Commerce recommends documenting the reasons.

5. **Can an existing rural school be expanded and served with sewer?**

   \textsuperscript{RCW 36.70A.213(2) does not prohibit either the expansion or modernization of an existing school in the rural area or the placement of portable classrooms at an existing school in the rural area.} However, the legislation does not specify whether a county may choose to authorize the extension of public facilities and utilities to an existing school in a rural area if the project also serves urban students and follows the steps in RCW 36.70A.213.

6. **If public facilities and utilities, such as sewer, extend to a rural school, who pays for the extension?**

   \textsuperscript{If the public facility or utility is extended beyond the urban growth area to serve a school, the public facility or utility must serve only the school, and the costs of such extension must be borne by the applicable school district based on a reasonable nexus to the impacts of the school\textsuperscript{16}, except to address public health and environment concerns detailed in the next section.}

\textsuperscript{14} RCW 36.70A.213 (b and c) do not define “affected cities”. Such cities could be considered as those within a school district’s boundary, or that would provide public facilities and services to the rural school, such as water, sewer, or roads.

\textsuperscript{15} For example, underlying land use regulations may preclude certain sites, such as resource lands of long-term commercial significance, hazardous critical areas, or in other areas that pose risks, such as airport clear zones. In addition, Commerce recommends consideration of potential impacts to “rural character” as defined in RCW 36.70A.030 (16):

\textsuperscript{16} RCW 36.70A.213 (1)(d).
7. If a sewer line extends to a school outside an urban growth area, can neighboring properties connect to the line?

RCW 36.70A.213 allows the extension of sewer lines outside urban growth areas only to serve a school sited in a rural area that serves students from a rural area and an urban area. RCW 36.70A.213(3) also allows connection to school-related public facilities and services where consistent with RCW 36.70A.110(4), “in those limited circumstances shown to be necessary to protect basic public health and safety and the environment and when such services are financially supportable at rural densities and do not permit urban development”.17,18 This could mean, for example, that there is a documented potential for failure of existing wastewater systems, or contamination of a source of drinking water, of surface water, or of shellfish beds.19 Generally, documentation of such a problem would come from the county health department, which may consult with the state Departments of Health and/or Ecology.20

Next, affected property owners may request connection to address the problem, and the county or affected cities must agree with the request. RCW 36.70A.213 states that a connection may be made if the property is no farther from the public facility or utility than the distance that, if a property were within an urban growth area, the property would be required to connect to the public facility or utility. In these cases, RCW 36.70A.213 (3) allows latecomer fees21 to be collected on behalf of the school district for up to 20 years to reimburse the school district expenditures to extend the public facility or utility.

8. Does the new law apply to private schools?

RCW 36.70A.211 – 213 do not distinguish between public school districts and private schools. The legislation was developed within the context of testimony regarding the siting, growth, and financing challenges experienced by public school districts, and statute is silent on its applicability to private schools.

17 RCW 36.70A.110 (4).
18 See Thurston Cty. v. Cooper Point Ass’n, 148 Wash. 2d 1, 57 P.3d 1156 (2002)
19 WAC 173-98-710
20 If the system is regulated under chapter 246-272A, the county health department provides documentation. If the system is regulated under chapter 246-272B, the state Department of Health (DOH) provides documentation. For cities or counties out of compliance with the GMA and seeking funding for a water pollution control projects, the declaration must come from DOH. See WAC 246-272A-0280, WAC 246-272B-07450, WAC 173-98-030(61,71).
21 There is no authorization in state law for school districts to collect latecomer fees. However, municipal owners of sewer utilities may collect them on behalf of school districts. See mrscc.org/Home/Explore-Topics/Public-Works/Finance/Latecomer-Agreements-for-Cities-Townsnbsp;Count.aspx for more information.
9. How can school districts and local governments work together to site schools?
Because the findings discussed in section 4b of this guidance require consideration of vacant and developable land with the urban growth area, Commerce recommends school districts and the local government first work together to identify potential school sites within urban growth areas, or, if sites within the urban growth areas are unavailable, to select rural sites and plan their development to minimize effects to rural areas and limit costs to school districts.

To facilitate the siting of schools within urban areas, Commerce recommends cities and counties work with school districts to assess zoning, height limits, and other factors that may affect the ability of a school to site within an urban growth area. Counties and cities can help school districts by identifying opportunities for joint-use facilities. County policies may address schools in the rural area, and set out locational, buffering or screening policies to protect rural character. As schools are considered in the rural area, the long-term plan for the area should be considered, but new school development should never be used to intentionally drive urban development in a rural area.

10. What information must Commerce submit to the state for schools planned, under construction or built under this law?
By December 1, 2023, the Department of Commerce must report to the Governor and the appropriate committees of the legislature about schools outside of urban growth areas that have been built, are under construction, or are planned, as a result of RCW 36.70A.213.22 The report must include the number, location, and characteristics of the schools (such as grade levels and associated recreation facilities), the number of urban and rural students served, and a cost analysis of schools built outside of urban growth boundaries. The state will be collecting this information from school districts. Commerce suggests the cost analysis include the costs of site acquisition, extension of public facilities and utilities, including sewer, water, road, sidewalk, and other improvements, and information about the cost of transporting students to the location of the school compared to a site or sites considered within the UGA. In some cases, a school district may analyze a single site, or may compare multiple sites, including urban or rural sites.

11. How are the laws different for Pierce County?
In Pierce County only, RCW 36.70A.211 provides that the county may authorize the siting of a school in a rural area, serving students from an urban area, even where otherwise prohibited by a multicounty planning policy,23 under the following circumstances:

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22 RCW 36.70A.213(4)
23 Multicounty planning policies are required by RCW 36.70A.210(7). Coordinated by the Puget Sound Regional Council, they are collectively called Vision 2040. As required by RCW 36.70A.211, these policies must be amended to

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• Pierce County must have adopted in its comprehensive plan a policy concerning the siting of schools in rural areas.

• Any impacts associated with the siting of such a school are mitigated as required by the state environmental policy act.

• Pierce County must be a participant in a multicounty planning policy. This policy must be amended, at its next regularly scheduled update, to include a policy that addresses the siting of schools in rural areas of all counties subject to the multicounty planning policy.

This means Pierce County may authorize a school outside an urban growth area, even when such a decision is not consistent with multicounty planning policies in Vision 2040, or subsequent multi-county planning policies addressing school siting. This provision expires June 30, 2031.

In addition, RCW 36.70A.211 states that a Pierce County school sited under this law may not be included in the district’s calculations for school impact fees, nor shall it receive funding from this source.\(^{24}\) In addition, if Pierce County chooses to site schools under RCW 36.70A.211, RCW 36.70A.212 requires Pierce County school districts to participate in Pierce County’s next periodic comprehensive plan update\(^{25}\) by:

• Coordinating its enrollment forecasts and projections with the county’s adopted population projections.

• Identifying school siting criteria with the county, cities and regional transportation planning organizations.

• Identifying suitable school sites with the county and cities, with priority to siting urban serving schools in existing cities and towns in locations where students can safely walk and bicycle to the school from their homes and that can effectively be served by transit.\(^{26}\)

• Working with the county and cities to identify school costs and funding sources to include in the capital facilities element of the Pierce County Comprehensive Plan.

In addition to the requirements under RCW.70A.211 and .212 for siting a school outside an urban growth area in Pierce County, the steps listed in RCW 36.70A.213 must be followed to authorize the extension of public facilities and utilities to the school.

\(^{24}\) As required by RCW 36.70A.211 (3)

\(^{25}\) Required by RCW 36.70A.130 (5). Pierce County is next required to review and update its comprehensive plan and development regulations by June 30, 2023.

\(^{26}\) RCW 36.70A.212
12. **State Contacts**

**Department of Commerce**  
Growth Management Services  
Technical assistance to cities and counties on the procedural and substantive aspects of the Growth Management Act.  
Anne Fritzel, Senior Planner, [Anne.Fritzel@commerce.wa.gov](mailto:Anne.Fritzel@commerce.wa.gov)  360-725-3064

**Washington State Department of Health**  
Indoor Air Quality/ School Environmental Health and Safety  
[www.doh.wa.gov/schoolenvironment](http://www.doh.wa.gov/schoolenvironment)  
Nancy Bernard, Program Manager, [Nancy.Bernard@doh.wa.gov](mailto:Nancy.Bernard@doh.wa.gov)  360-236-3072  
Technical assistance to school districts as they consider school siting decisions.

**Department of Health Wastewater Management Section**  
[wastewatermgmt@doh.wa.gov](mailto:wastewatermgmt@doh.wa.gov)  360.236.3382  
Technical assistance for questions especially relating to the topics of public health and safety for wastewater.

**Washington State Department of Archeology and Historic Preservation**  
Technical assistance in identifying cultural and historic resources on potential school sites. If school districts are using State Capital Budget funding from OSPI, other State of Washington agencies, or federal government assistance for planning, design, or construction of new schools, these projects require a review and comment by DAHP and interested Tribes.