

## Comments on the Comprehensive Plan from the Council Web Site

Updated May 11, 2016

First Name	Last Name	District	Comment
Molly	Holmes	4	<p>May 9, 2016 The Honorable Dow Constantine 401 5th Ave. Suite 800 Seattle, WA 98104            Ms. Lauren Smith Deputy Director for Regional Planning 401 5th Ave. Suite 810 Seattle, WA 98104            RE: Executive Recommended 2016 King County Comprehensive Plan Dear Executive Constantine and Deputy Director Smith: The Seattle-King County Advisory Council on Aging and Disability Services appreciates this opportunity to comment on the Executive Recommended 2016 King County Comprehensive Plan. The Comprehensive Plan will serve as a guide for King County in responding to the needs of an increasingly diverse community, including residents of all ages and abilities, through the plan's emphasis on equity, social justice, and the social determinants of health; inclusion of a new chapter on Housing and Human Services; and policies that promote built and social environments that work for everyone. The County's commitment to serving older adults and people with disabilities is demonstrated by the Plan's support for and recognition of the following policies and programs: Sustainable neighborhoods that allow people to age in place (p 1-16-1-17) Affordable housing and diverse housing choices, including policies designed to address the impending severe shortage of affordable rental housing for low-income seniors (ch 4) Integration of service-enriched housing into community-based settings (ch 4) Affordable housing subsidy programs for older adults and people with behavioral health, cognitive, physical or developmental disabilities (policy H-152) Standards for healthy and accessible housing (policy H-166) Equitable transportation opportunities and amenities for seniors and people with disabilities (p 8-6; policy T-104) Consideration of equity impacts and benefits when planning, developing, and implementing transportation programs, projects, and services (policy T-104a) Workforce development programs to retrain economically displaced older workers (policy ED-301). Our review of the plan identified several opportunities to expand and strengthen this commitment, including: Add language to Chapters 3 and 7 acknowledging the value of rural lands, parks, open spaces, and cultural resources to older adults in promoting health, wellness, and connectedness to our natural and cultural heritage. Coordinate and align with other regional planning efforts, such as the Area Plan on Aging and King County and PSRC's Coordinated Transit-Human Services Transportation Plan. Maximize innovative approaches to solve the County's housing challenges by increasing the stock of housing that works for people of all ages and abilities. Continue to integrate health throughout all chapters of the Plan and conduct a Health Impact Analysis of the Plan to better account for the intersection between public health and growth management planning. The need to plan and prepare for King County's aging population is acute: Individuals over the age of 60 will approach 25 percent of the total population by 2040. The fastest-growing segment of the total population is the oldest old – those 85 and over who are most in need of older adult services. Older populations living</p>
Bonnie	Morrison	3	<p>Terribly interested in stopping the Remlinger Investment Property from using the 4 to 1 plan to take farm land and convert it to tightly packed new housing. This would be adjacent to 70 brand new homes that ate up farm land adjacent to the city of Carnation and boarding Remlinger's proposed sight. Right now I look at the 70 new homes where part of a dairy farm existed for many decades. I live on adjacent land that is part of the hundred year old dairy farm. The new development is beyond an eye sore, nature ripped up for \$\$\$\$. Remlinger Investors have the same idea. Please don't let the friendship between Gary Remlinger and the council member he funds, Lambert, be allowed to take any more of our beautiful land for development. Please help preserve what we are so fortunate to have. Thank you, Bonnie Morrison</p>

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Claudia	Donnelly	9	I would like to see more green building in the May Creek Basin area and to require KC developers to keep mature trees in the area to be developed. In addition, I would like to see KC do more in the WRIA 8 area to prevent storm water runoff from affecting private property owners.
Andy	Tidball		plan that increase the opportunity for residents to live smaller, particularly by making it possible to live in so-called "tiny houses". These houses are generally smaller than even minimum sized manufactured homes, and there is a small but growing movement of people who desire to live in them for a wide variety of reasons. This style of house seems ideal in serving many of King County's housing goals and problems. They are relatively inexpensive to both build and live in, placing their ownership within financial reach of lower income residents. They have been used successfully in several cities to help combat homelessness. They encourage greener living in a variety of ways, such as taking up less space, using fewer resources to build and maintain, and containing less space for excessive consumerism. They allow greater population densities than traditional single family housing, and are ideally suited to the growing segment of the population living in households with fewer people. When organized into planned neighborhoods of tiny houses that include shared spaces and common amenities, they foster strong communities. Despite all of these upsides, it is essentially impossible to legally live in a tiny house in King County. My wife and I considered making an attempt to do so and ultimately gave up. One thing that attracted us to tiny houses was the possibility of building it on a trailer small enough to be towed without a special permit, allowing us to bring our house with us when we move to remain close to employment. Many other tiny house enthusiasts also build on a trailer in order to officially make it a vehicle instead of a house, allowing them to get around various housing codes such as minimum house and room sizes. Unfortunately, in King County this approach leads to the problem of it being illegal to use a vehicle (even an RV) as a permanent residence. Even if we were to overcome those problems, finding a place to put a tiny house is also a major challenge. Long term RV parks might be a possibility, but again permanent dwelling in an RV is illegal. Additionally, they don't tend to be in urban areas with easy access to things like public transit. That problem is generally shared by other potential locations as well, such as manufactured home parks, or rented space in the yard of a single family residence, each of which also have their own additional problems. People interested in tiny houses still want to live in houses that are built to rigorous codes and standards, and in locations for which they are intended, but currently have no choice but to work around the laws and codes rather than within them, simply because no other framework exists. As this movement continues to grow and spread, it will behoove jurisdictions like King County to work with it to develop such a framework in order to capitalize on its many possible benefits. A few other places, such as Portland OR and Asheville NC, are starting to test these waters, and as a result are becoming centers of the tiny house movement. This is a movement whose philosophy, goals, and benefits align well with King County, as evidenced by the fact that the movement is relatively strong in this area even despite the difficulties. I strongly encourage the
Donald	Kupillas	9	Hello, Unfortunately I am unable to attend the meeting in person. I would like to propose that the council focuses on resolving the traffic congestion on Issaquah-Hobart Road. I have attended meetings with Issaquah's traffic task force, however they did not address I-H Road as it is in Unincorporated King County. The idea that was proposed was to add a 3rd lane that is interchangeable between Northbound and Southbound directions. In the mornings, the additional lane can lessen the Northbound congestion. In the afternoon / evenings the additional lane can lessen the Southbound congestion. Having the 3rd lane between Cedar Grove Road and 2nd Ave. SE in Issaquah would alleviate the majority of the traffic issues. Thanks for your consideration. Don Kupillas

## TDRs and Transportation Concurrency

### King County Comprehensive Plan 2016 Update

In the Transfer development Rights section of the Rural chapter, policy R-323b allows relief from transportation concurrency if 1) TDRs are purchased from a rural site and used in a rural site; both in the same failing travel shed, or 2) without TDRs if certain property ownership and subdivision history has been fulfilled (along with a development condition).

There is a companion policy (T-224) in the Transportation chapter that refers to this topic in the Rural chapter.

#### 1) Discussion

For those of us who live in a failing travel shed, increasing the number of daily road trips makes sense ONLY if the offsetting reason is VERY compelling. Using a TDR from a sending site in the same travel shed is not a compelling reason.

Note that the second part of the policy doesn't even require the purchase of a TDR to get relief from failing concurrency, which means there's no offsetting reason for increasing road trips in a failing travel shed.

The TDR program argues that, when TDRs from the same failing travel shed are used, EVENTUALLY the total number of generated road trips in the travel shed will not have been increased because the sending site sold its development rights (i.e. won't ever generate new road trips).

You might imagine how poorly this logic plays with the residents in the failing travel shed. The perception is this policy is purely to increase demand for the use of TDRs, and provides a barometer of the value the county places on those development rights (i.e. increase traffic where failing concurrency).

#### a) Rural-to-Rural

R-323b is a rural-to-rural TDR transaction. According to the description in the comprehensive plan, key to the intent and value of the TDR program is the idea of moving development from areas not intended for increased density (e.g. the rural area), to areas intended for increased density (e.g. urban centers).

Although there may be legitimate circumstances where rural-to-rural TDR transfers make sense, the idea of allowing them for relief from failing transportation concurrency is quite a stretch.

#### b) No receiving site criteria

One of my key criticisms of the TDR program is the lack of receiving site selection criteria. There's actually been a little progress reflected in some new policies in the comprehensive plan. However, the TDR program has thus far been reluctant to actually codify receiving site criteria, whether in policy, county code, or TDR program processes.

Based on the experience the county has getting city jurisdictions to accept TDRs, the receiving criteria appear to fall into three categories: 1) location selection, 1) local benefit, and, in some cases, 3)

R-323 The Rural Area and Natural Resource Land Preservation TDR Program shall include, but is not limited to, the following:

b. In order to satisfy transportation concurrency requirements in the Rural Area in a transportation concurrency travel shed that is non-concurrent, a development proposal for a short subdivision creating up to four lots may purchase TDRs from other Rural Area or Natural Resource Land properties in the same travel shed; allowing this is intended to reduce overall traffic impacts in rural travel sheds by permanently removing development potential. The transfer shall not result in an increase in allowable density on the receiving site. A short subdivision creating two lots where the property has been owned by the applicant for five or more years and where the property has not been subdivided in the last ten years shall satisfy the transportation concurrency requirements without having to purchase TDRs;

compensation, in the form of amenities and/or tax offsets (e.g. TDRs reduce potential tax revenue at the sending site and increase potential tax revenue at the receiving sites).

Policy R-323b does not satisfy ANY of these receiving site criteria. This is particularly problematic in a failing travel shed. IF we want to give relief from concurrency, being able to select the source location for new daily road trips will at least allow the option to minimize/avoid new trips that would likely use failing roads.

**Transportation Concurrency Travel Sheds**

I was a member of the Transportation Concurrency Expert Review Panel (TCERP) when the concept of “travel sheds” was introduced. Viewed by the panel as a significant improvement in the county’s transportation concurrency program, it encapsulated a vision for road travel that recognized a conceptual similarity with water sheds. It makes sense that road travel tends to originate in local neighborhoods and communities, and collect on ever-increasing road capacities; analogous to the idea of tributaries into creeks into rivers.

Seeing road transportation that way sets King County apart from many, if not all other jurisdiction in the Puget Sound Region.

The county’s transportation concurrency program measures travel time along arterial roads in the unincorporated area. If less than 85% of the primary and minor arterial road segments within a travel shed fail Level of Service standards (LOS), the whole travel shed fails.

This makes supreme sense given the county’s travel shed design which, uniquely recognizes that increasing vehicle trips in one area of a travel shed will more than likely impact road segments well away from the new development.

R-323b also does not attempt to provide any local benefit, other than “taking one for the team” by sacrificing local congestion for the preservation of rural lands.

R-323b does not provide for any discussion about compensation for the increase in traffic (e.g. funding to aid in making the travel shed pass transportation concurrency).

R-323b does not provide for any discussion about compensation for the increase in traffic (e.g. funding to aid in making the travel shed pass transportation concurrency).

2) Recommendations

a) Concurrency

Transportation concurrency is arguably the most sensitive of all

programs to site location for increasing road trips. With more than 15% of the measured arterial road segments failing to meet LOS, odds are good that the new road trips generated by the development will only add to the failing conditions. Currently, the “best” performance among the five failing travel sheds is 71% passing segments; 83% of LOS, making the odds of impacting failing segments likely higher.

R-323b and T-224 have no sensitivity to development site selection within a travel shed, for providing local residents a compelling benefit argument, or for mitigating traffic congestion impacts.

b) Rural-to-rural

There are no documented reasons for rural-to-rural TDRs, which violate the core intent of the TDR program: i.e. moving development from areas where it’s not desired (rural) into areas where it is desired (urban, preferably urban centers). This means there’s no justification for the rural-to-rural component of R-323b and T-224.

R-323b also allows relief from concurrency without the purchase of a TDR, which is irrelevant to the TDR section of the chapter, and exceeds the scope described in transportation concurrency policy, T-224, which only mentions relief by TDR purchase.

T-224 In the Rural Area, the concurrency test may include a provision that allows the purchase of Transferable Development Rights in order to satisfy transportation concurrency requirements.

The perception is that the TDR program has a priority for permanently removing development rights, at the cost of all other criteria and/or impacts. R-323b and T-224, perhaps more than any other, lay bare how far the TDR program is willing to go to get development rights purchased.

Unless and until the TDR program deals with receiving site criteria, and provides justification for rural-to-rural density transfers, R-323b and T-224 should be eliminated from the comprehensive plan.

Greater Maple Valley Unincorporated Area Council  
P.O. Box 101  
Maple Valley, WA 98038

May 3, 2016

To: King County Council TrEE Committee

Re: 2016 KCCP Update

Chairman Dembowski,

Since early 2015 the Greater Maple Valley Unincorporated Area Council (GMVUAC) has provided inputs to the Executive's Office in its development of its 2016 KCCP Update Public Review Draft (PRD). The GMVUAC subsequently provided comments on the PRD.

We are now reviewing and preparing Written Comments on the Executive's proposed 2016 KCCP Update submitted to the KC Council on March 1 of this year.

Attached is our first set of Written Comments. These deal with **Transportation-related** parts of the Update's Chapters, Appendices, and Attachments. Our comments consist of **CONCERNS** and **RECOMMENDATIONS**.

In early June and July we will submit the remaining sets of Written Comments on **Growth Management-, Economic Development- and Environment-related** parts of the KCCP Update's Chapters, Appendices, and Attachments.

Should you have any questions regarding the attached Written Comments, please contact our Coordinator for the KCCP Update, Peter Rimbo, at 425-432-1332 or [primbos@comcast.net](mailto:primbos@comcast.net). Thank you in advance for your careful consideration of our Written Comments.

Sincerely,

Steve Hiester  
Chairman, Greater Maple Valley Unincorporated Area Council

# Transportation-related Comments on Proposed 2016 KCCP Update

## Chapters

CHAPTER 1—REGIONAL PLANNING (In development; to be submitted in June)

CHAPTER 2—URBAN COMMUNITIES (In development; to be submitted in June)

CHAPTER 3—RURAL AREA AND NATURAL RESOURCE LANDS (In development; to be submitted in June)

CHAPTER 4—HOUSING AND HUMAN SERVICES (No review)

CHAPTER 5—ENVIRONMENT (In development; to be submitted in July)

CHAPTER 6—SHORELINE MASTER PROGRAM (No review)

CHAPTER 7—PARKS, OPEN SPACE, & CULTURAL RESOURCES (In development; to be submitted in July)

### CHAPTER 8—TRANSPORTATION

1. **T-102** *“As a transportation provider and participant in regional transportation planning, King County should support, plan, design, and implement an integrated, coordinated and balanced multimodal transportation system that serves the growing travel needs of the county safely, effectively and efficiently and promotes a decrease in the share of trips made by single occupant vehicles.”*

**CONCERN:** *Regional policies should explore the establishment of County road “networks,” which know no jurisdictional boundaries (similar to State roads), funded by all County taxpayers. We reviewed the January 2016 recommendations of the County Bridges and Roads Task Force, but they inexplicably did not include establishing County road “networks.” We urge the Council to to explore this concept and, therefore, we make the following RECOMMENDATION.*

**RECOMMENDATION:** *A second sentence should be added to T-102: “King County should explore establishing county-wide “road networks,” which know no jurisdictional boundaries, or a Transportation Benefit District, both funded by all County taxpayers.”*

2. **T-208** *“King County shall not add any new arterial capacity in the Rural Area or (~~natural resource lands~~) Natural Resource Lands, except for segments of rural regional corridors that pass through (~~rural or resource lands~~) Rural Areas and Natural Resource Lands to accommodate levels of traffic between urban areas. Rural regional corridors shall be identified in the Transportation Needs Report (Appendix C) and shall meet all of the following criteria:*

- a. *Connects one urban area to another, or to a highway of statewide significance that provides such connection, by traversing the Rural Area and Natural Resource Lands;*
- b. *Classified as a principal arterial;*
- c. *Carries high traffic volumes (at least 15,000 ADT); and*

## Transportation-related Comments on Proposed 2016 KCCP Update

d. *At least half of P.M. peak trips on the corridor are traveling to cities or other counties.”*

**CONCERN:** *Such “rural regional corridors,” so designated “to accommodate levels of traffic between urban areas,” cannot be sustainably funded simply by Rural Area property taxes. T-208 simply provides a means of identifying such “corridors,” but provides no solutions. The same could be said for Policies T-403 and T-407 later in this chapter. They state solutions should be found, yet identify none.*

**RECOMMENDATIONS:** *Besides RECOMMENDATIONS given under T-102 above, to begin to address the Rural road usage/funding imbalance problem State laws (RCWs 36.78, 46.68, 120-124, & 84.52) could be reviewed for opportunities to enable a more transportation-sustainable allocation of gas tax monies and provide more flexibility in revenues used. Working with the State, some mechanism should be developed, along with incentives, for cities to share revenues with Counties, possibly tied to growth that occurs in the absence of job opportunities. While we understand State law changes are outside the scope of the Comprehensive Plan update, policies herein should explore the Puget Sound Regional Council’s (PSRC’s) Transportation 2040 user-pays model by providing authority for usage charges, such as tolling key roads and methods to implement such strategies.*

3. **T-212** *“King County shall work with cities for the annexation of county-((owned)) roadways and/or street segments located in the urban area and within or between cities, in order to provide for a consistent level of urban services on the affected roads and reduce the burden on unincorporated taxpayers that are supporting this urban infrastructure.”*

**RECOMMENDATION:** *We strongly support the Executive’s recognition of the unsustainable funding problem for unincorporated transportation infrastructure.*

4. II. Providing Services and Infrastructure that Support the County Land Use Vision / ((H)) **G. Concurrency**

**CONCERN:** *Concurrency must have an enforcement mechanism, be linked to a public dialog, and include “regional” perspective among multiple jurisdictions. Infrastructure needs should be identified as early and accurately as possible, with implementation of identified improvements truly concurrent, otherwise the development approval must be delayed or denied.*

5. **T-224** *“In the Rural Area, the concurrency test may include a provision that allows the purchase of Transferable Development Rights in order to satisfy transportation concurrency requirements.”*

We wholly concur with Docket Item #15 to eliminate T-224 as TDRs should not be used to satisfy Concurrency testing anywhere within the Rural Area. Concurrency is a tool used to ensure infrastructure keeps up with development. The use of TDRs to satisfy Concurrency testing does nothing to help reach that goal and, in fact, can hinder reaching that goal. Consequently, we provide the following:

**CONCERN:** *Within a failing Travel Shed purchasing TDRs should not allow granting of a Concurrency certificate, since traffic is still being added to a failing area. We asked KCDOT if examples exist where T-224 was applied? KCDOT’s Ruth Harvey responded the Policy has never been applied. We have*

## Transportation-related Comments on Proposed 2016 KCCP Update

*communicated with KC DNRP's Darren Greve regarding the TDR program.*

*Consequently, we suggest the following RECOMMENDATIONS:*

***RECOMMENDATION:*** *Eliminate Policy T-224, as TDRs should not be used to satisfy Concurrency testing anywhere within the Rural Area. Concurrency is a tool used to ensure infrastructure keeps up with development. The use of TDRs to satisfy Concurrency testing does nothing to help reach that goal and, in fact, can hinder reaching that goal.*

***RECOMMENDATION:*** *Add a new Policy under Concurrency to address the item the KC Council added to "Scope of Work" as follows:*

***T-xxx*** *When conducting concurrency testing, King County shall collaborate with other jurisdictions to ensure infrastructure improvement strategies help prevent travel shed failure caused by unfunded city and state projects and traffic generated outside the unincorporated area.*

6. P. 8-38: **IV. Financing Services and Facilities that Meet Local and Regional Goals/ B. Road-Related Funding Capabilities.** Rural Area taxpayers should not be providing diminishing tax monies any more than they already are to enhance or expand urban-to-urban travel corridors. King County should adopt a long-term vision that recognizes the reality of long-term road revenue shortfalls and should act proactively to avoid decreases in future funding levels. Policies herein should be based on such realities in order to be successful. Consequently, we recommend the following :

***RECOMMENDATION:*** *On p. 8-38, add the following to the end of the second paragraph:*

***"Without a critical revision to our statewide tax code or the State gas tax jurisdictional distribution formula being modified to reflect the reality that many County roads are used by Urban commuters, it is highly predictable that the tax base for Roads funding will never return to pre-recession values in real terms."***

**CHAPTER 9—SERVICES, FACILITIES, & UTILITIES** (In development; to be submitted in June)

**CHAPTER 10--ECONOMIC DEVELOPMENT** (In development; to be submitted in June)

**CHAPTER 11—COMMUNITY SERVICE AREA PLANNING** (No comments)

**CHAPTER 12— IMPLEMENTATION** (In development; to be submitted in June)

### **Technical Appendices**

**Technical Appendix A—CAPITAL FACILITIES** (No review.)

**Technical Appendix B—HOUSING** (No review.)

**Technical Appendix C—TRANSPORTATION** (No comments.)

# Transportation-related Comments on Proposed 2016 KCCP Update

## Technical Appendix C1—TRANSPORTATION NEEDS REPORT (TNR)

### 1. CONCERN:

*A great dichotomy exists between growth targets, which are not forecasts, and identifying and addressing transportation needs. Such a gap complicates planning efforts and, as more development occurs, could result in inadequate infrastructure to meet GMA Concurrency requirements. Clearly realistic forecasts, not allocated growth targets, should be the primary information used in Comprehensive Planning and identification of infrastructure needs.*

*The PSRC states: “No direction is given in the GMA as to the methodology for setting growth targets. Cities and counties have a duty to accommodate the targets, but are provided broad discretion on how they do so.” (“Growth Management by the Numbers,” July 2005, p. 11.) This can result in an opaque process through which cities utilize selective criteria to furnish information they deem relevant or advantageous.*

*Further, jurisdictions can grossly exceed their growth targets. This was the case in 2012, as a small city in Southeast King County, in one of the fastest growing and heavily congested areas in the State, with a growth target of 1,900 new residences, signed Development Agreements that would eventually bring an additional 6,050 residences, or approximately 20,000 people, into the city. This scenario could easily repeat itself throughout the county and state as long as it remains to each county and its cities to determine what is relevant in developing such projections.*

### RECOMMENDATION:

*Although outside this Comprehensive Plan update, potential solution paths for discussion could include changes in State law to establish criteria that will ensure realistic forecasting, not minimum growth targets, inform Comprehensive Planning and Transportation Needs Reports. The following RCWs could provide such opportunities:*

*RCW 43.62 -- DETERMINATION OF POPULATIONS -- STUDENT ENROLLMENTS*

*43.62.035 -- Determining population -- Projections*

*RCW 36.70A -- GROWTH MANAGEMENT -- PLANNING BY SELECTED COUNTIES & CITIES.*

*36.70A.040 -- Who must plan -- Summary of requirements—Development regulations must implement comprehensive plans [Requires cities and unincorporated areas to plan for future growth through formation of Comprehensive Plans. In King County, Comprehensive Plans are reviewed/revised every four years with the current target year of 2025. Many King County cities currently are updating their Comprehensive Plans to be completed by June 2015.]*

## Technical Appendix C2—REGIONAL TRAILS NEEDS REPORT (No comments)

## Technical Appendix D—Growth Targets and Urban Growth Area (No comments)

## **Transportation-related Comments on Proposed 2016 KCCP Update**

**Technical Appendix R—PUBLIC OUTREACH FOR DEVELOPMENT OF COMPREHENSIVE PLAN (No comments)**

### **Attachments**

**Attachment—SKYWAY-WEST HILL ACTION PLAN (No review)**

**Attachment—AREA ZONING STUDIES (In development; to be submitted in June)**

**Attachment--DEVELOPMENT CODE STUDIES (In development; to be submitted in June)**

**Attachment—POLICY AMENDMENT ANALYSIS MATRIX (No comments)**

**Attachment—PUBLIC PARTICIPATION REPORT (No comments)**