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KING COUNTY DEPARTMENT OF
NATURAL RESOURCES AND PARKS

PROPOSED KING COUNTY COMPREHENSIVE PLAN - 1985

**(Formerly Titled Executive Proposed
General Development Guide)**



KCR
877
1985
EIS

FINAL VIRONMENTAL IMPACT STATEMENT

**King County
Planning Division
March, 1985**

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FINAL
ENVIRONMENTAL IMPACT STATEMENT

FOR

KING COUNTY
COMPREHENSIVE PLAN--1985
(GENERAL DEVELOPMENT GUIDE)

King County
Department of Planning and Community Development
Planning Division

Prepared in Compliance with

The State Environmental Policy Act of 1971
(Revised Code of Washington 43.21C)

and

King County Code 20.44

March 15, 1985



Harold Robertson, Manager
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FACT SHEET

A. PROPOSED ACTION

Executive Proposed General Development Guide and King County Council proposed King County Comprehensive Plan--1985.

The proposed action by King County is to adopt all or part of the proposed action as a major update and replacement of the 1964 Comprehensive Plan for King County (the county-wide land use plan), and to take initial implementing action in the form of community plan amendments and zoning changes to lands within the County.

The County Executive sent the Proposed Guide to the County Council in April, 1984. The proposed King County Comprehensive Plan--1985 is the Council's title for its rewritten version of the original proposed action. Upon enactment by the King County Council and the Executive, the plan will become the official county-wide land use plan for all of unincorporated King County.

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G. DATE OF ISSUE OF DRAFT EIS

August 14, 1981

H. DATE OF ISSUE OF SUPPLEMENTAL DRAFT EIS

May 11, 1984

I. DATE OF ISSUE OF FINAL EIS

March 15, 1985

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I. INTRODUCTION

The proposed action is adoption and initial implementation of the King County Comprehensive Plan--1985 as a major update and replacement of the 1964 Comprehensive Plan for King County, and its amendments, to guide land use and public improvement decisions in unincorporated King County. Initial implementation will consist of modifications to the King County Zoning Code and application of new zones to designated agricultural and forest lands. Modifications to the Zoning Code will include new zone classifications for agriculture, commercial forestry and rural residential uses, changes to development standards such as street improvement requirements, and overhauling and reformatting the entire code to make it more efficient and readable. Specific effects of the proposed action on zoning were discussed in the Draft and Supplemental EISs; Section II below discusses the different code changes that would implement the County Council's modifications to the proposed action.

The Comprehensive Plan revision process began with background research in 1978 and 1979, and a series of public workshops in 1979. The plan revision was first published as a rough working draft in March, 1980, and entitled "The General Development Guide". Additional public meetings and detailed County Council review of the working draft took place throughout 1980.

A second draft Guide, which was the proposal described in the 1981 Draft Environmental Impact Statement (DEIS), was published in May, 1981. The Draft EIS was issued on August 14, 1981. Comments were due September 30, 1981. Public testimony was taken on the Draft EIS and the second draft Guide on September 23, 1981.

In 1982, the King County Executive appointed a citizen advisory group, the Executive Task Force on Growth Management, which worked for about one year to examine the issues so far raised and to make policy recommendations for a new proposal. The third draft, entitled the Executive Proposed General Development Guide, was published, and formally proposed by the County Executive to the King County Council, in April, 1984. A Supplemental Draft EIS, focusing on the differences between the Executive Proposed General Development Guide and the 1981 draft, was issued May 11, 1984 and comments were received through July 13, 1984.

The King County Council's review of the Executive Proposed General Development Guide consisted of a formal public hearing on June 11, 1984, two series of public meetings, and a detailed examination of the Executive Proposed Guide's policies and Comprehensive Plan Map by the Planning and Community Development Committee. The Planning and Community Development Committee reported out the King County Comprehensive Plan--1985, for review and action by the full Council, on February 13, 1985. The Council's public hearing on the proposed action is scheduled to be reopened on March 25, 1985.

In accordance with WAC 197-11-560(5), the Planning Division has determined, based on the comments received and the effect of the King County Council's modifications to the proposed action, that only minor changes are required to the Draft EIS.

Therefore, this Final EIS contains a description of the proposed action now before the County Council, summaries of the critical comments and corrections received on both the Draft and Supplemental Draft EISs, responses to these, the texts of all written comments, and the transcripts of the oral testimony on the Draft EIS, pursuant to WAC 197-11-560(2). Responses to comments are to be read as corrections or additions to the Draft or Draft Supplemental EIS where appropriate. Page numbers refer to the 1981 Draft EIS unless specifically noted otherwise.

Since the proposed Comprehensive Plan--1985 (or any land use plan) is a nonproject action covering a large land area and a long time period, its EIS can describe impacts--and even some existing conditions--only in general terms. While this EIS and adoption of the plan might lessen the need for a subsequent EIS on an action within the plan's framework such as a community plan or specific private development proposal, these actions would be evaluated separately under SEPA. See Sections 1 and 22 under RESPONSES TO COMMENTS for more discussion of this aspect of the EIS and proposed action.

The Table of Contents displays the organization of this Final EIS. Following a description of the County Council's modifications to the proposed action and a "General Comments" section, responses are organized into topics corresponding to the sections of the original Draft EIS. Sections marked by an asterisk did not receive any critical comments and are not treated further in this document, pursuant to WAC 197-11-560. Comments on the Supplemental Draft EIS are combined with those on the original Draft EIS where applicable. A 1981 date following a comment indicates it was on the original Draft EIS; a 1984 date indicates a comment on the Supplemental Draft EIS. Comments on the Draft EIS Summary were treated as comments directly on the aspect of the proposed action or environmental element mentioned. Letters and testimony purporting to be on the Draft EIS with non-critical comments and comments solely on the proposal itself are reproduced but not responded to in this Final EIS.

II. DESCRIPTION OF THE PROPOSAL

A. PROPOSAL NAME AND LOCATION

The proposed action is the adoption and initial implementation by King County of the King County Comprehensive Plan--1985 as a major update and replacement of the 1964 Comprehensive Plan for King County and its amendments. The project area includes all land subject to land use regulation within unincorporated King County. The County surrounds Seattle, Washington and is bounded by Puget Sound, including Vashon Island, on the west, the crest of the Cascade Mountains on the east, Pierce County on the south and Snohomish County on the north. The proposed action would be followed by additional implementing zoning actions and code changes.

Because the proposed action is the adoption and implementation of goals and policies with associated regulatory and programmatic changes, it does not involve physical changes or engineering, although development occurring within the framework of the King County Comprehensive Plan--1985 would have physical and engineering aspects.

B. THE PROPOSED KING COUNTY COMPREHENSIVE PLAN-1985

The proposed King County Comprehensive Plan-1985 includes an overall plan concept and plan map, and detailed land use and facilities policies. These are summarized below by the chapter order in which they appear in the proposed plan. The text below also points out differences between the proposed plan and the Executive Proposed General Development Guide (which was analyzed in the Draft Supplemental Environmental Impact Statement (DEIS)).

1. Plan Concept (Chapter II)

The plan concept establishes the overall direction for physical planning in King County and provides a framework for the more detailed land use policy chapters. This chapter also includes a small-scale reproduction of the official Comprehensive Plan Map. (The map is also included in the Final EIS on the following page.)

The plan concept recommends a growth and development pattern, or a vision of what King County would look like in the future, including the general location and character of residential, commercial, industrial, rural, resource and open space uses.

The proposed plan's intended growth and development pattern would have five major land use designations (excerpted from the Council proposed Comprehensive Plan-1985, Chapter Two):

- o URBAN AREAS, where most new housing and jobs will locate, and where most public spending for facilities, services and open space will be focused, to assure liveability and efficiency.

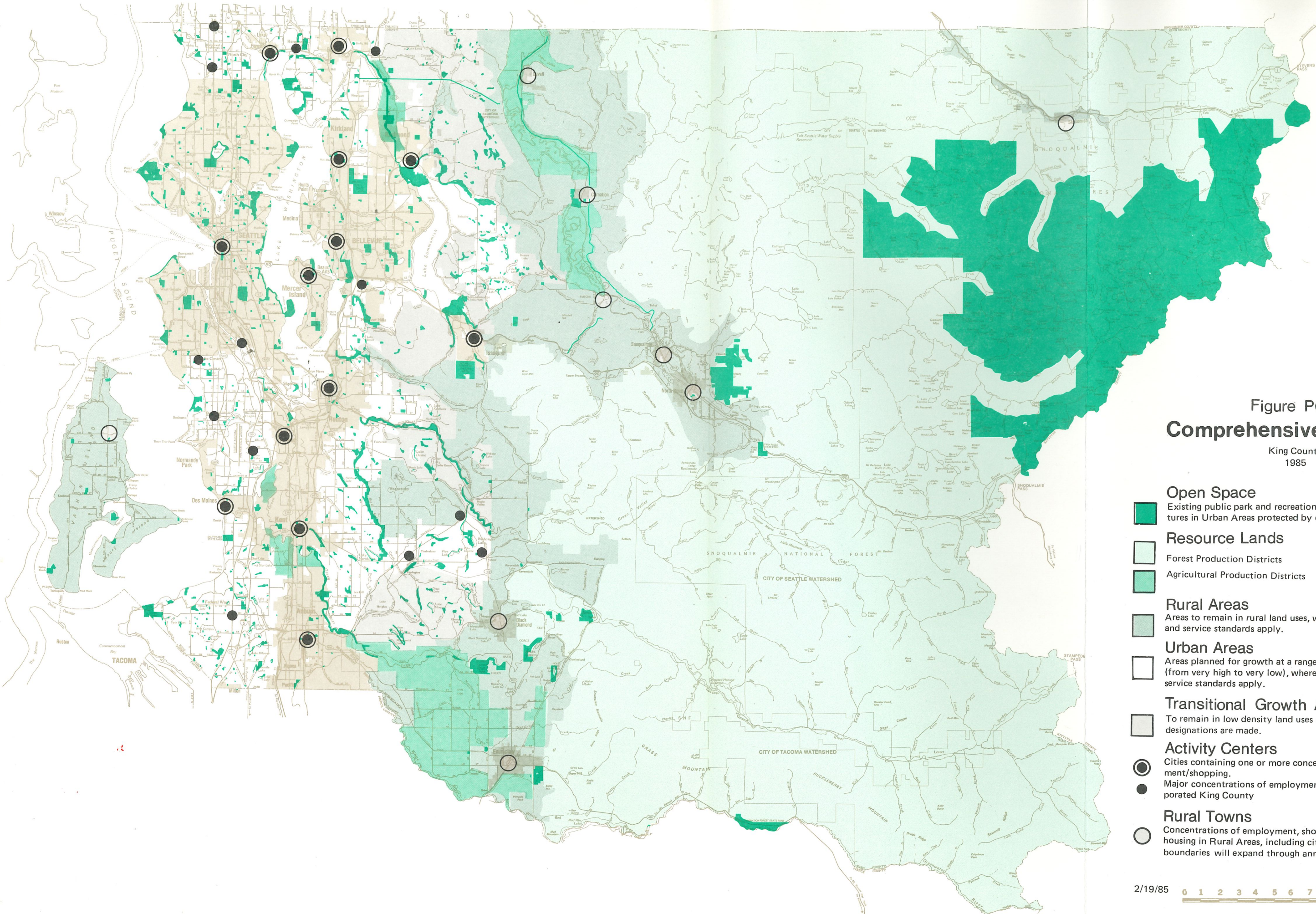


Figure PC-1
Comprehensive Plan Map

King County
1985

- Open Space**
Existing public park and recreation areas, and natural features in Urban Areas protected by environmental regulations.
- Resource Lands**
 - Forest Production Districts
 - Agricultural Production Districts
- Rural Areas**
Areas to remain in rural land uses, where rural public facility and service standards apply.
- Urban Areas**
Areas planned for growth at a range of residential densities (from very high to very low), where urban public facility and service standards apply.
- Transitional Growth Areas**
To remain in low density land uses until Urban or Rural designations are made.
- Activity Centers**
 - Cities containing one or more concentrations of employment/shopping.
 - Major concentrations of employment/shopping in unincorporated King County
- Rural Towns**
Concentrations of employment, shopping and higher density housing in Rural Areas, including cities. Existing Rural Town boundaries will expand through annexations.

- Urban Activity Centers, where most commercial/industrial growth will locate.
- o TRANSITIONAL GROWTH AREAS, where development densities and services will remain low, until urban facilities and services needed for urban densities can be assured, or until a long-term Rural designation is applied.
- o OPEN SPACE, which will consist of valuable scenic, recreational, and environmentally sensitive lands throughout King County.
- o RURAL AREAS, where development densities will remain low so that their primarily undeveloped and pastoral character, small farms, and wood lots will continue.
- Rural Towns, where appropriately scaled commercial/industrial growth and higher density housing will locate.
- o RESOURCE LANDS, where incentives and land use regulations will promote long-term agriculture, forestry, and extraction of mineral resources.

The plan concept also includes an overall approach to assuring adequate public facilities and services to support the growth and development pattern envisioned for King County. The proposed plan's policies call for facilities and services to be considered in land use plans, and for availability of essential facilities and services to be verified in the development review process. The plan also calls for standards to define adequate facilities and services differently for Urban, Rural and Transitional Growth Areas, and to call out which facilities and services must be in place or assured as development occurs.

The primary difference between the plan concepts of the proposed Comprehensive Plan--1985 and the Executive Proposed Guide is the designation of Transitional Growth Areas. This designation would be applied to areas with little existing development and low service levels, where community plans would be the means of designating them either Urban or Rural. Approximately 93 square miles or 60,000 acres are proposed as Transitional Growth Areas, including approximately 22 square miles that were proposed as Rural and 71 square miles that were proposed as Urban in the Executive Proposed Guide.

Some community plans (e.g. Newcastle) have already made Urban designations in these areas; here, interim low density land uses would remain until urban facilities and services could be made available to support growth. The Executive Proposed Guide provided for use of interim low densities as a phasing tool; it did not include a Transitional Growth Area designation, but designated as Urban all lands where growth would be phased.

The Executive Proposed Guide also provided for prioritizing public spending within Urban Areas by designating Urban Growth Centers, which were geographic areas where funds would be targeted. The Comprehensive Plan replaces this approach with policies on spending

priorities and a general policy (PC-205) allowing the County to establish geographic target areas for spending.

2. Planning and Implementation (Chapter III)

This chapter explains how the land use planning and regulatory system works, specifying the legal and functional relationships among the Comprehensive Plan, community plans, functional plans, and development regulations. The chapter also covers coordination of development with public facilities and services, large parcel developments, and cooperation among King County, the cities, rural towns, special districts, and other public agencies.

There are some differences in intent between the proposed plan and the Executive Proposed Guide. The Comprehensive Plan includes more specific amendment criteria and procedures. These clarify when and how the Comprehensive Plan will be evaluated and amended following adoption. In addition, the proposed plan allows conversion of forest land to other uses through a community plan amendment process, rather than the Comprehensive Plan amendment process that would have been required by the Executive Proposed Guide. The proposed plan's criteria for forest land conversions are intended to prevent curtailment of forestry on adjacent lands and to ensure compatibility with other adjacent land uses and public facility and service availability.

3. Environment and Open Space (Chapter IV)

This chapter contains policies to preserve open space; recognize natural constraints to development; and protect wildlife habitat and environmentally sensitive areas. The proposed plan calls for natural features to be a fundamental consideration in land use planning and regulation. The chapter consolidates existing open space policies, calls for protection of certain sensitive areas (for example, very steep slopes, floodways) in review of development proposals, and addresses natural drainage features as a system.

The proposed plan calls for conserving a substantial amount of open space through incentives, purchase and environmental regulation. A key action needed to implement the open space concept described in the proposed plan will be an extensive inventory to identify specific areas to be preserved, and to specify the necessary measures to assure their preservation. The proposed plan's open space policies are similar to the Executive Proposed Guide, but clarify and expand the definition of open space and the wildlife protection policies.

The proposed plan specifies which hazardous and environmentally sensitive areas should be protected from all development through regulation (very steep slopes, landslide hazard areas, the floodway portion of floodplains, designated valuable wetlands). The proposed plan's general environmental policy intent is similar to that of the Executive Proposed Guide, except that the proposed plan allows areas with potential underground coal mine hazards to be developed if the hazard is precisely located and not disturbed or built on.

4. Residential Development (Chapter V)

This chapter contains general policies encouraging variety, affordable housing choices, and environmental and energy-conscious residential development standards. Location, improvement and density policies for housing are directly related to the plan concept, which calls for relatively high densities on unconstrained lands in Urban Areas, and for generally low densities and improvement standards in Rural Areas.

The plan calls for higher densities in Urban Areas--7-8 dwellings per acre for new development in environmentally suitable areas where there is a significant amount of vacant lands but also recognizes that low densities would be required in locations with environmental constraints (such as steep slopes), areas with long-term service constraints, or areas with established low density character that are essentially already developed. These policies are similar in intent to policies in the Executive Proposed Guide, but edited for clarity.

In Rural Areas, the Comprehensive Plan--1985 calls for maximum overall densities of one unit per five acres. Densities of one unit per 2.5 acres are allowed, however, in areas where a pattern of more than one lot per five acres already exists, where public water is available, and where soil conditions allow on-site sewage disposal without adverse impacts to water quality. The plan also permits community plans to establish densities of one unit per ten acres. These policies allow more growth than the Executive Proposed Guide, which called for averages of one unit per ten acres in most rural areas, and one unit per five acres in areas where lots smaller than ten acres were already the norm. The difference in rural growth capacity is summarized in Section II-D., below, and in Figures 1, 2 and 3.

In Transitional Growth Areas the proposed plan calls for interim low densities of one dwelling per five acres, until the areas are redesignated either Urban or Rural through community plans. These density policies are similar to the growth phasing policies included in the Executive Proposed Guide for lands to be redesignated Urban.

5. Commercial and Industrial Development (Chapter VI)

This chapter contains broad economic development policies and addresses design factors in commercial and industrial development (for example, maximum size of neighborhood business areas, parking and pedestrian access).

The proposed plan encourages economic development within Activity Centers. Activity Centers include concentrations of commercial and industrial uses within and outside of cities in Urban Areas. Activity Centers are intended to provide nearby employment, shopping, services and cultural/recreation activities in a convenient development pattern intended to promote transportation energy conservation. Existing Activity Centers are indicated on the Comprehensive Plan Map; new centers would be shown when designated.

The proposed plan differs from the Executive Proposed Guide by including more economic development policies, to clearly tie land use plans to potential strategies of an economic development functional plan. The proposed plan also includes more specific policies for community centers, differentiating these retail centers from smaller Neighborhood Centers. The chapter is also reorganized into sections addressing each type of center and Rural Towns.

6. Resource Lands (Chapter VII)

The proposed Comprehensive Plan--1985 calls for long-term conservation of farmlands, forests and mineral resource areas for use by resource industries. The proposed Comprehensive Plan Map shows those farmlands and forests which the County intends to conserve through a combination of regulations (very low average densities, restrictions on residential subdivisions) and incentives (e.g., the farmlands development rights purchase program) will be used to prevent conversion to other uses. Significant mineral resource areas with the best mining potential and the fewest potential adverse impacts will be designated as Mining Sites following evaluation and public review.

The proposed plan calls for maintaining larger parcels for resource lands, recommending 80-acre parcels for forest areas, 35-acre parcels for agricultural areas suitable for livestock, and 10-acre parcels in other agricultural areas.

The chapter is similar to the Executive Proposed Guide in overall intent, but rewritten to call out more specifically that the mineral resource policies will be implemented through a separate functional plan involving an inventory and cooperation with such agencies as the U.S. Department of Interior and Washington State Department of Natural Resources, and residents and land owners. The agricultural policies also call for 10-acre parcels instead of 15-acre parcels for farmlands used for crops, and both agricultural and forestry policies allow lot size averaging and clustering, rather than uniform lot sizes.

7. Facilities and Services (Chapter VIII)

The policies in this chapter of the proposed plan emphasize the importance of adequate facilities and services for planned growth, and the need for different standards for Urban, Rural and Transitional Growth Areas. This chapter addresses transportation (including street standards for commercial, industrial and residential development), utilities (including surface water management), public safety, and schools.

The proposed plan specifies that maintaining and upgrading existing facilities in Urban and Rural Areas have the highest spending priority and add a commitment to providing necessary facilities.

The policies throughout the chapter, but especially transportation and utilities, have been rewritten to clarify King County's relationship with independent service providers such as sewer and water districts, and to make it clear that adequate facilities and services are required in time to meet the need, not necessarily prior to all development.

The rewritten plan expands upon the small airport policies of the Executive Proposed Guide, emphasizing that all siting decisions should be guided by a regional planning process that looks at cumulative impacts. The policies discourage proliferation of small airfields and state that the impacts of such airfields on Rural and Resource Lands should be mitigated.

8. Heritage Sites (Chapter IX)

This chapter encourages the preservation, restoration and adaptive reuse of historical sites and buildings. It consolidates existing policy ("Heritage Sites as Open Space", adopted by Ordinance 2991).

The proposed plan adds to existing policies by encouraging compatible land uses and zoning designations on heritage sites. There are no differences in policy intent for heritage sites between the proposed plan and the Executive Proposed Guide.

C. INITIAL IMPLEMENTATION

The proposed Comprehensive Plan itself does not include a specific implementation program similar to that included in the Executive Proposed Guide. Most of the actions needed to implement the Proposed Guide, however, would also be needed to implement the proposed plan, including changes to adopted community plans and County planning procedures; changes to land use regulations such as zoning; programmatic and budgetary actions by King County, cities and special districts; changes to King County administrative procedures; and some changes to Washington State Law.

The major measures that would be needed to ensure effective implementation of the Council's proposed Comprehensive Plan-1985 are described below. (Funding for some implementation actions has already been included in the 1985 Budget; the specific actions to be taken in 1985 will be determined when actual budget appropriation is approved.)

1. Implementing the Plan's Major Land Use Designations

Effective implementation of the Urban Area, Transitional Growth Area Rural Area, and Resource Land designations will require completing pending community plans and making revisions to existing community plans to make them consistent with the proposed Comprehensive Plan--1985, and applying necessary zones. The County Council is considering making community plans consistent with the Comprehensive Plan as each plan is revised on its regular schedule. Zoning changes will also be needed in those parts of eastern King County without community plans.

In Urban Areas, the proposed action calls for urban residential zoning (small lot single family, townhouse and multifamily) at an average density of about 7-8 dwellings per acre for physically suitable lands where there are significant amounts of vacant land, and where adequate services are or can be made available. Some parts of the Northshore, Tahoma/Raven Heights, East Sammamish, Newcastle and Soos Creek Community Planning Areas would potentially meet these criteria.

In Rural Areas, the proposed action calls for maximum densities of one unit per five acres. The Rural Areas with adopted community plans already have zoning consistent with this proposal. Zoning changes to apply rural zoning would be needed in the Bear Creek, Snoqualmie, Vashon Enumclaw and East King County Planning Areas.

In the Vashon, Bear Creek and Snoqualmie community planning areas, zoning would be applied through the community planning process currently underway. In the Enumclaw area, the community planning process could be initiated following adoption of the proposed plan, or a separate area zoning process could be used to apply rural zoning.

The proposed plan recommends low interim residential densities in Transitional Growth Areas, calling for a maximum of one unit per five acres with clustering preferred (the GR-5 zone). Transitional Growth Areas are in the Soos Creek, Northshore, East Sammamish, Newcastle, Tahoma/Raven Heights and Bear Creek community planning areas. Except for Bear Creek, the ultimate Urban or Rural designation of these Transitional Growth Areas has been made. Most of these areas have low density zoning, but the zoning is not consistently as low as recommended by the proposed plan, or does not provide for clustering. In addition, the designation includes some areas where the existing pattern of lots precludes use of the preferred 5-acre zone.

See Section II below for a discussion of the impacts of the proposed action on capacity for new development.

2. Preparing an Open Space Plan

Open space designations shown on the Comprehensive Plan Map when the proposed plan is initially enacted will consist of public parks and environmentally sensitive areas for which accurate maps are available.

The proposed plan calls for a separate functional plan, the Open Space Plan, to inventory all lands in King County suitable for designation as open space (for example, parks, scenic natural areas, river and view corridors, environmentally sensitive areas), and include a parcel-by-parcel description of suitable methods for protection (for example, purchase, dedication requirements on development, regulation of environmentally sensitive areas with development hazards, and incentives such as density bonuses, transfer of development rights and tax breaks). Work on the Open Space Plan started in 1985. When the Open Space Plan is adopted, it will result in amendments to the Comprehensive Plan Map in the form of Open Space designations.

Initial implementation of the proposed Comprehensive Plan's open space policies will consist primarily of land dedication requirements for neighborhood parks and for sensitive areas protection.

3. Addressing Public Facilities and Services

Implementing the proposed plan's facilities and service policies will require setting urban and rural standards for critical services (for example, roads, sewers, fire protection), establishing funding plans

and enacting service level standards, including compatible standards with the cities. Work on the King County Transportation Plan, which began in 1984, is a key step toward implementing these policies for roads.

4. Preparing an Economic Development Plan

The proposed plan recognizes the importance of economic development, and calls for a separate functional plan, an Economic Development Plan, to identify opportunities for economic growth in cities and unincorporated areas. Work on the plan was approved as part of the 1985 Budget. Elements of the plan will include (1) an economic base analysis; (2) an inventory of physically suitable, vacant lands in Activity Centers, including parcel sizes, zoning, and site characteristics, to determine the need to expand existing Activity Centers or designate new ones; (3) an assessment of existing economic development programs; and (4) development of appropriate roles and strategies for King County government. The plan will be developed in cooperation with the cities, economic development groups, and King County residents, and may result in subsequent changes to adopted community plans.

5. Other Implementing Measures

There are other measures--for example, detailed changes to zoning and subdivision codes--needed to carry out the proposed plan's policies. These measures will include modifications to existing zone classifications (for example, consolidating certain residential zones with identical density requirements), changes to the subdivision and short subdivision codes, new residential road standards, and interlocal agreements with cities on future annexation areas and compatible development standards. Initial work on zoning code changes began in early 1985.

D. SUMMARY OF IMPACTS

1. General

The discussions of impacts of the second draft General Development Guide and Executive Proposed Guide in the Draft EIS and Supplemental Draft EIS which were based on growth forecasts remain valid for the proposed King County Comprehensive Plan--1985. This is because the proposed plan, like both revisions of the Guide, does not intend to influence the rate or amount of population or employment growth, only its location. Impacts of the proposal on community plans and land use regulations are discussed in the preceeding section on implementation.

2. Capacity for Growth

Although neither the General Development Guide nor the proposed Comprehensive Plan are intended to affect the rate or amount of population and employment growth, the impacts of the proposed action on King County's zoned capacity for growth are of public concern, and quantitative comparisons of residential capacity between alternative land use plans are possible. Figures 1, 2 and 3 below show the capacities of "no action," the Executive Proposed Guide (reprinted from the Sup-

plemental Draft EIS), and the proposed Comprehensive Plan--1985. Each chart is accompanied by the methodology and assumptions used in calculating housing unit capacity.

Land supply for Figure 1 was estimated using the assumptions and methodology of the 1983 Annual Growth Report. The highlights of this methodology are:

- o Vacant land acreage estimate is as of January, 1983.
- o Seattle and Skykomish are excluded from the analysis. Seattle is excluded because most development there does not take place on vacant land. Skykomish and the eastern third of King County were not included in the Vacant Land Inventory (VLI).
- o The VLI covers all land west of Range 8, plus townships 23 and 24 in Range 8. Environmentally Sensitive Lands as defined in KCC 21.54 and 25.28 (severe landslide hazards, valuable wetlands, coal mine hazards, flood hazard overzones, natural shoreline environment designations) are excluded, along with Agricultural Lands of County Significance designated by Ordinance 3064.
- o Unincorporated lands are grouped into five land use categories, based on zoning: Single family, multifamily, commercial, industrial and other zones (A, F-R, G-5, and GR). Land consumption rates for each category within various subareas are based on actual use rates from 1977 to 1982 (for example, single family densities range from 1.35 to 3.16 units per acre, depending on location; multifamily densities range from 12.5 to 15.9 units per acre; and other-zone densities vary from one unit per 2.5 acres to one unit per ten acres, depending on the zone). Commercial and industrial land consumption is based on existing employment densities (employees per acre), which also vary by location. (Some adopted community plans allow far more multifamily or commercial uses than now permitted by zoning; implementing these community plan designations would increase slightly the capacity of the No Action alternative.)
- o Forecast growth of housing units and employment was divided by the 1977-82 residential and employment densities to derive forecast demand for land in terms of acres per year for the period 1980-2000. The 1983 supply of land in each category was divided by the forecast annual average consumption to express the 1983 supply in terms of years of growth. The forecast number of housing units per year was multiplied by the number of years capacity to derive the total capacity for housing units.
- o For other vacant unincorporated lands zoned for agriculture, forestry, GR or G-5, recent plats and short plats were used to determine typical densities of residential development. The densities were multiplied by the estimated vacant acreage in each of the zones to determine the other-zone No Action capacity in housing units.

FIGURE 1
CAPACITY OF HAZARD-FREE
VACANT LAND -- NO ACTION
King County

	<u>Forecast Demand For Land</u>		<u>1983 Capacity of Hazard-Free Vacant Land</u>		
	<u>Acres per Year</u>	<u>Housing Units per Year</u>	<u>Acres</u>	<u>Housing Units</u>	<u>Years</u>
<u>Unincorporated King County</u>					
Single Family	2,191	4,263	131,400	255,500	60
Multifamily	150	2,188	1,300	19,000	8.5
Other (A, FR, G-5, GR)	1,410	300	113,000	24,000	80
Resid. Subtotal		<u>6,751</u>	<u>245,700</u>	<u>298,500</u>	<u>44</u>
Commercial	128	NA	1,500	NA	12
Industrial	31	NA	2,600	NA	83
<u>Suburban Cities</u>					
Single Family	219	689	9,700	30,300	44
Multifamily	126	2,000	1,300	20,500	10
Commercial	194	NA	1,200	NA	6
Industrial	122	NA	<u>3,800</u>	<u>NA</u>	
		<u>32</u>			
Cities Total		<u>2,689</u>	16,000	50,800	24
<u>King County Total (less Seattle)</u>					
Single Family	2,410	4,952	141,100	285,800	55
Multifamily	276	4,188	2,600	39,500	9
Other (A, FR, G-5, GR)	1,410	300	113,000	24,000	80
Resid. Subtotal		<u>9,440</u>	<u>256,700</u>	<u>349,300</u>	<u>37</u>
Commercial	322	NA	2,700	NA	8
Industrial	153	NA	6,400	NA	42
King County Total (less Seattle)			265,800		

(Source: Supplemental Draft EIS on General Development Guide; King County Planning Division, Land Development Information System)

Figure 2 sets out the capacity analysis for the Executive Proposed Guide. It shows an overall capacity of 443,900 new housing units in unincorporated King County, if the Executive Proposed Guide were implemented as described in the assumptions below. The capacity is divided into urban and rural areas.

- o Seattle and Skykomish are excluded from the analysis. Seattle is excluded because most development there does not take place on vacant land. Skykomish and the eastern third of King County were not included in the Vacant Land Inventory.
- o The Vacant Land Inventory (VLI) covers all land west of Range 8, plus townships 23 and 24 in Range 8. Environmentally Sensitive Lands as defined in KCC 21.54 and 25.28 (severe landslide hazards, valuable wetlands, coal mine hazards, flood hazard over-zones, natural shoreline environment designations) are excluded, along with Agriculturaal Lands of County Significance designated by Ordinance 3064.
- o Annual demand for housing units was assumed to be the same as forecast for No Action -- 6750 dwellings in unincorporated areas. This demand was allocated between Urban and Rural Areas based on the 1982 forecast allocations and the actual 1980 to 1982 geographic distribution of building permits issued (5500 Urban, 1250 Rural). This assumption probably overstates Urban and understates Rural land supply since the Guide's policies encourage a shift of building activity to Urban Areas, and especially within cities.
- o In Urban Areas, the Executive Proposed Guide's density objective of 7 to 8 units per acre or new development was assumed to be realized only on vacant parcels of five acres or larger; on smaller parcels, development would occur at "No Action" densities, which are lower.
- o The breakdown of Urban Area vacant land into large and small parcels (over and under 5 acres) was based on the 1978 VLI. It was updated to 1983 by subtracting 1978-83 subdivided acreage from 1978 acreage in parcels of 5 acres or larger, adding the 1978-83 subdivided acreage to the 1978 acreage in smaller parcels, and subtracting out all smaller parcels consumed through building permits from 1978-83. All construction was assumed to occur on small parcels. The ratio of large to small vacant parcels zoned for multifamily use was assumed to remain constant from 1978 to 1983.
- o In Rural Areas, one-half of the area outside Rural Towns was assumed to be in large enough parcels to be limited to the Guide's preferred rural density of one dwelling per 10 acres; the other half would develop at one dwelling per 5 acres. Existing vacant substandard lots which might be buildable are not included. Land in Rural Towns was assumed to be consumed at No Action densities.

FIGURE 2

RESIDENTIAL CAPACITY OF HAZARD-FREE VACANT LAND
EXECUTIVE PROPOSED GUIDE
 Unincorporated King County
 1983

<u>URBAN AREAS</u>	<u>Acres</u>	x	<u>Consumption Density</u>	=	<u>Housing Units</u>
Large Parcels (5+ acres)	38,000		7.5		285,000
Small Parcels					
Single Family	36,900		3.16		116,600
Multifamily	950		15.9		15,100
Urban Subtotal	75,900				416,700
<u>RURAL AREAS</u>	<u>Acres</u>	x	<u>Consumption Density</u>	=	<u>Units</u>
Rural Towns (Vashon, Fall City)	500		3.6		1,800
Parcels Over 10 acres	84,750		1 per 10 acres		8,450
Parcels 5-10 acres	84,750		1 per 5 acres		16,950
Rural Subtotal	170,000				27,200
Unincorporated King County Total	245,900				443,900

(Source: Supplemental Draft EIS on General Development Guide; King County Planning Division, Land Development Information System)

The estimated residential capacity of the Proposed King County Comprehensive Plan--1985 in unincorporated King County shown in Figure 3 is based on the following assumptions:

- o Vacant land acreage estimate is as of January, 1983.
- o Seattle and Skykomish are excluded from the analysis. Seattle is excluded because most development there does not take place on vacant land. Skykomish and the eastern third of King County were not included in the Vacant Land Inventory.
- o The Vacant Land Inventory (VLI) covers all land west of Range 8, plus townships 23 and 24 in Range 8. Environmentally Sensitive Lands as defined in KCC 21.54 and 25.28 (severe landslide hazards, valuable wetlands, coal mine hazards, flood hazard over-zones, natural shoreline environment designations) are excluded, along with Agricultural Lands of County Significance designated by Ordinance 3064.
- o All development is assumed to occur on vacant, hazard-free land. No redevelopment is assumed to occur.
- o Unincorporated King County is assumed to maintain its current share of forecast growth; no increased share of development is assumed in the suburban cities.
- o Annual demand for housing units was assumed to be the same as forecast for the Executive Proposed Guide -- 6750 dwellings in unincorporated areas. This demand was allocated between Urban and Rural Areas based on the 1982 forecast allocations and the actual 1980 to 1982 geographic distribution of building permits issued (5500 Urban, 1250 Rural). This assumption probably overstates Urban and understates Rural land supply since the Plan's policies encourage a shift of building activity to Urban Areas, and especially within cities.
- o In Urban and Transitional Areas, the density of 7 to 8 units per acre for new development was assumed to be realized only on one-fourth of the vacant land acreage; one half of the remaining vacant acreage, development would occur at "No Action" densities, which are lower. The remaining quarter was assumed to be designated for rural development at a density of one unit per 2.5 acres.
- o In Rural Areas, one-half of the area outside Rural Towns was assumed to be developed at a density of one dwelling per 5 acres; the other half would develop at one dwelling per 2.5 acres. Existing vacant substandard lots which might be buildable are not included. If a significant area were designated for 10-acre maximum density, as allowed by the Plan, Rural Area capacity would be between that of the proposed plan and the Executive Proposed Guide. Land in Rural Towns was assumed to be consumed at No Action densities.

- o Potential expansion of Rural Towns was not estimated, although expansion would be consistent with draft policies, and could substantially increase rural capacity.

FIGURE 3

RESIDENTIAL CAPACITY OF HAZARD-FREE VACANT LAND
PROPOSED KING COUNTY COMPREHENSIVE PLAN-1985

Unincorporated King County

<u>URBAN AREAS</u>	<u>Acres</u>	x	<u>Consumption Density</u>	=	<u>Housing Units</u>
Vacant Acreage Achieving High Density	11,600		7.5		87,000
Vacant Acreage at Trends Densities					
Single Family	33,800		3.16		106,800
Multifamily	940		15.9		15,000
Urban Subtotal	46,300				208,800
<u>Transitional Growth</u>	<u>Acres</u>	x	<u>Consumption Density</u>	=	<u>Housing Units</u>
Vacant Acreage Achieving High Density	10,300		7.5		77,200
Vacant Acreage Designated Rural	10,300		1 per 2.5		4,120
Vacant Acreage at Trends Density	20,700		3.16		65,412
Transitional Growth Area Subtotal	41,300				146,732
<u>RURAL AREAS</u>	<u>Acres</u>	x	<u>Consumption Density</u>	=	<u>Units</u>
Rural Towns (Vashon, Fall City)	500		3.6		1,800
5 Acre Policy	79,000		1 per 5 acres		15,800
2.5 Acre Policy	79,000		1 per 2.5 acres		31,600
Rural Subtotal	158,500				49,200
Unincorporated King County Total	246,100				404,732

(Source: King County Planning Division, Land Development Information System)

3. Costs of Services in Rural Areas

Because the proposed Comprehensive Plan--1985 provides for more capacity for growth in Rural Areas due to higher densities than the Executive Proposed Guide, it will have different impacts on the costs of public services in Rural Areas. Figure 4 compares the impacts of four different densities (one dwelling per 10 acres, 5 acres, 2.5 acres, and one acre) on a hypothetical rural area for certain public facilities and services. The facilities and services compared were selected on the basis of available cost data or previous estimates such as the Dornbusch study used in the Draft EIS, and their potential relationship to residential density.

Figure 4 includes assumptions and some conclusions about different densities in the hypothetical rural area. The proposed plan calls for a basic rural density of one dwelling per five acres, with provision for 2.5-acre densities in areas already mostly subdivided below five acres, and for 10-acre densities in areas designated by community plans. The intent of the comparison is to show the general magnitude and direction of changes in cost as density changes. The actual impacts of the proposed plan or its alternatives are unknown since the facility and service cost data are not comprehensive, King County's Rural Areas already have some infrastructure in place (e.g. roads and some public water systems), and the exact spatial distribution of the different densities will depend on community plans, which will have separate EISs.

COSTS OF PUBLIC FACILITIES*
BY LOT SIZE: 10 to 2.5 Acres, and 1 Acre
(Hypothetical 20 square mile area built out at each density)

Planning Division
February 5, 1935

ACRES PER DWELLING	10 Acres	5 Acres	2.5 Acres	1 Acre (35,000 square feet)
Total Dwelling Units	1280	2560	5120	12,800
Total Population	3456	6912	13824	34,560
Roads (arterials & public local access) capital annual maintenance	\$20.4 million \$119,000	\$28.9 million \$168,000	\$55.7 million \$326,208	\$128.7 million \$701,990
Community Parks capital annual maintenance	N/A	N/A	N/A	\$ 1.5 million \$ 15,600
Fire Protection capital annual operation	\$879,900 \$152,500	\$879,900 \$152,500	\$1.8 million \$305,000	\$3.8 million \$582,200
Police Protection (patrol personnel only)	\$53,970	\$107,940	\$215,880	\$319,900
Public Water (distribution & storage) capital annual maintenance	N/A	N/A	\$13.9 million \$36,800	\$74.3 million \$196,600
Public Sewers Local collection capital costs	N/A	N/A	May be needed in future	\$221.2 million
Interceptors, treatment, pump stations	N/A	N/A		\$42.7 million
Surface Water Management	\$739,500	\$739,500	\$4,841,821	\$5,626,580
TOTAL CAPITAL COSTS	\$22.0 million	\$30.5 million	\$76.2 million	\$213.9 million \$477.8 million with sewers
TOTAL ANNUAL COSTS	\$375,500	\$429,400	\$883,900	\$1.8 million

Costs of Public Facilities for
Alternative Rural Densities

FIGURE 4

Assumptions:

- o 20 square miles of completely undeveloped and unserved land "built out" at each density.
- o Household size 2.7 persons.
- o Parcel dimensions for acreage are uniform, based on typical breakdown of a section into 10-acre, 5-acre, and 2.5-acre parcels.
- o Private cul-de-sac roads serve subgroups of eight lots at 10-acre to 2.5-acre densities.
- o Existing standards/service levels apply for arterials, parks, public safety, utilities.
- o Facility cost estimates from Fiscal Impacts study, Draft Supplemental EIS (except rural water system), and May Creek Basin studies.

Conclusions:

- o Total costs for facilities and services for the rural area increase with residential densities, leaving fewer public dollars to spend in urban areas.
- o Total costs rise faster than population as density increases from 1 dwelling per 5 acres to 1 dwelling per 2.5 acres, due to increased needs for fire protection and public water supply systems.
- o Costs rise even faster when density increases to 1 dwelling per acre, due to urban fire flow demands on the water system, to other facilities needed for increased fire protection, and parks. The cost of public sewers, when needed, doubles the total cost of development at one unit per acre.

III. COMMENTS AND RESPONSES

A. ISSUE

1. General Comments

Scope of EIS

1a. The Draft EIS does not provide enough detail on the impacts of the Guide or on how it would be implemented. (Burlington Northern 1984, Hillis et. al. 1981, 1984, Land Use Research Council 1981, Weyerhaeuser 1981, 1984, Washington Forest Protection Association 1984.)

Response: The level of detail in the Draft and Supplemental Draft EISs on implementation as well as other aspects of the proposed action results from balancing several factors: the nonproject nature of the proposal (WAC 197-11-442); the fact that a comprehensive land use plan is general in nature and is carried out in phases (e.g., future detailed community plans and implementing ordinances) and through site-specific project proposals, which also are subject to SEPA; the fact that both the proposal and its implementation measures are subject to legislative review and modification both before and after initial adoption and implementation; and the desirability of completing the EIS process as early as possible to aid review by elected officials and the public (WAC 197-11-406). Also see 22a and 22c.

1b. The Draft EIS should distinguish between policy and implementation in evaluating impacts. (Land Use Research Council 1981) The Draft Guide should include the top priority implementing actions. (Weyerhaeuser 1984)

Response: The Draft and Supplemental Draft EISs were deliberately written with the explicit working assumption that the policies of the proposed Comprehensive Plan would have impacts directly, without a duplicate discussion of the impact of implementing those policies (p. 65). The intent of this approach was to aid readability and clarity by conciseness.

Given any adopted land use policy, impacts could vary depending on how effective and/or cost-efficient its implementation turned out to be. It is also the case that implementation is an appropriate phase for incorporating mitigating measures to address unwanted impacts. This is explicitly addressed in the discussion of alternative implementing measures (pp. 209-214).

The proposed action is adoption and implementation of a comprehensive land use plan, which is general in nature and serves as a framework for subsequent implementing actions. It would be inappropriate to literally "include" subsequent implementation in a plan. For example, some implementing actions are technical in nature (e.g. standards for roads or fire protection), and some are programmatic and ongoing (e.g. future capital improvement programming decisions). In addition, some

of the proposed plan's policies could be implemented in different ways (e.g., different incentives for open space protection).

1c. The Draft EIS does not address the potential of local resistance in existing communities to higher density urban development and redevelopment consistent with the Guide (this issue raised with respect to infill, community plans, and coordination with incorporated jurisdictions). (Burlington Northern 1981, Weyerhaeuser 1981, Greater Kingsgate Council 1981, Hillis et. al. 1981, 1984)

Response: The potential of community opposition to development is acknowledged, but remains unquantifiable. Responses to the questionnaire distributed during public review of the second draft Guide in 1981 indicated 59 percent approval of higher densities as a way of reducing housing and public service costs, and 71 percent agreement with encouraging development in areas with existing facilities as a way of reducing public service costs. These were countywide responses, rather than responses in a particular community or to a specific development proposal. In late 1981, another survey was taken on public reaction to the key policies of the second draft Guide, including higher urban densities. A majority of all respondents (69 percent) supported the concept of higher urban densities, but not in their own communities. A large majority of urban residents (80 percent), however, would accept higher densities in their communities in combination with improved public facilities and protection of existing developed neighborhoods.

The intent of the proposed plan is to provide a framework of policies and regulations that is adequate to address citizens' concerns about community quality, and to successfully deal with impacts so that development approvals consistent with the plan are defensible against legal challenges.

1d. Incentives to encourage development consistent with the Guide's plan concept are not mentioned or are not spelled out in detail. (Greater Kingsgate Council 1981, Burlington Northern 1981, Weyerhaeuser 1981)

Response: Some incentives (fast track permit processing, density increases) are discussed on pp. 59 and 62 of the Draft EIS. The use of tax-free industrial revenue bonds, authorized by a recently approved state constitutional amendment, also could be used to foster economic development consistent with the plan's land use policies. The proposed plan itself contains numerous references to incentives for protecting open space, as well as density credits through the planned unit development process to foster the plan's goals. Also see 1a.

1e. The Draft EIS does not discuss the impacts in the rural area if employment diversity is not allowed. (Burlington Northern 1981, Weyerhaeuser 1981 and 1984)

Response: The Comprehensive Plan--1985 provides for a full range of types of economic development in rural towns, consistent with avail-

ability of public facilities and services and compatible with surrounding rural areas. The proposed plan attempts to achieve a balance in the growth of employment and households in developing areas. The approach of the proposed plan is to encourage most households to locate in closer proximity to where forecast new employment growth is expected to occur, which means mainly in Urban Areas. To do otherwise would not be conducive to cost-effective use of the existing public service infrastructure.

Both the Executive Proposed Guide and the County Council's Comprehensive Plan--1985, unlike the second draft Guide, make a distinction between Rural Areas (intended primarily for low-density residential development) and Resource Lands (intended for long-term agriculture, commercial forestry, and mineral extraction).

The proposed policy towards employment growth does continue the relatively narrow employment base currently located in Rural Areas outside rural towns and Resource Lands. There are two basic reasons why the proposed plan does not attempt to reverse the existing situation:

1. Resource Lands by definition, are characterized by resource-based employment. Rural Areas outside rural towns, by definition, are characterized by very low-density, nonintensive uses. Other employment types could substantially alter the character of any rural area, in effect making it non-rural. Given the already existing commitment to preserving the resource lands and rural areas of King County (e.g., Motion 4152, Program Guidelines #2, 4, 6, 7, 8), it would not be consistent to encourage extensive growth of non-rural employment in Rural Areas.
2. The fiscal impact analysis of alternative growth patterns clearly indicated that employment growth in existing activity centers, and existing Rural Towns, was a cost-effective method of using the existing public service infrastructure. "Employment diversification" in the rural areas means to encourage the growth of non-rural employment in areas where it is costly to provide necessary public service infrastructure, and to increase development pressure on farmlands and commercial forestlands. Preservation of farmlands and forest lands is already existing county (and state) policy.

1f. The EIS fails to address the social and economic impacts of the proposed Guide; for example, overcrowding in urban areas. (Property Owners of Washington (POW) 1981, Weyerhaeuser 1981, 1984, Greater Kingsgate Council 1981)

Response: As a general land use plan, the proposed action's direct social impacts are so minimal that no quantified statements about them can be supported. Federal and state budgetary decisions on social programs, rather than land use plans, should be the main focus for

social concerns. For example, the proposed Comprehensive Plan's policies encouraging higher densities in urban communities could help remove regulatory barriers to lower-cost housing that would benefit the poor and the elderly; however, such policies are permissive only, and by themselves would not cause lower-cost housing to be provided.

Questions about possible effects of "overcrowding," a term which is not quantitatively defined, are hypothetical, being based on unverified assumptions. "Evidence" of "overcrowding" or associated poverty as a cause of crime can be countered with population and income statistics supporting an opposite thesis. For example, Houston, Texas, which is one of the most spread-out cities in the U.S., has a crime rate almost two and one-half times higher than that of Boston, Massachusetts, an older, denser city. This is in spite of the fact that Houston also has one of the 25 highest average per capita incomes in the U.S. (Hammond Almanac, 1979, pp.245, 248, 262).

For a discussion of impacts of the proposal on the human ("built") environment, see Sections III-C-2 (Housing) and III-C-4 (Fiscal Conditions and Public Services) of the Draft EIS (pp. 147-155, 166-175), and pp. 66 to 107 of the Supplemental Draft EIS. Also see WAC 197-11-448 in the SEPA Guidelines.

Data

1g. The Draft EIS contains no data or is inconsistent on the expected amount of infill development (including development in cities), has no analysis of infill's adverse impacts, and does not discuss mitigating measures for infill's adverse impacts. (Land Use Research Council 1981, Weyerhaeuser 1981, 1984, POW 1981, Greater Kingsgate Council, Hillis et.al. 1981, 1984, City of Bellevue 1984) The Supplemental Draft EIS should discuss the Executive Proposed Guide's increased reliance on an infill strategy. (Hillis et al. 1984, Burlington Northern 1984)

Response: Neither the Executive Proposed General Development Guide nor the Council's proposed King County Comprehensive Plan--1985 assumes infill, either in cities or in mature unincorporated suburbs, will play a greater role than in the past in accommodating growth. Subject to acceptable mitigation of adverse impacts, however, infill (however, loosely or tightly defined) is viewed as generally beneficial in fiscal and energy terms by the proposed plan (e.g., policies PC-101, PC-204, R-103 and R-203). This conclusion is based on available analysis of the impacts of different growth alternatives (Fiscal, Economic and Energy Impacts of Four Alternative Development Patterns; King County, 1980). However, monitoring of development activity in response to adoption and implementation of the Comprehensive Plan will be needed to assess how significant a role infill in unincorporated areas can play in accommodating growth. Infill in Seattle and other built-up cities probably will not play a major role in regional growth without significant changes outside the scope of the plan (e.g., transportation energy prices, federal tax laws).

On page 135, the Draft EIS stated that market forces would probably encourage infill over time, with or without the proposed action, and that from a countywide perspective infill would be insignificant in terms of meeting forecasted housing demand. The Draft EIS's statements should have been qualified, in that the expected amount of "infill" depends on the definition of it. HUD's 1981 study, "Urban Infill: Research Findings and their Policy Implications" by the Real Estate Research Corporation (RERC), defines infill as development on "vacant parcels that are already served by utilities and are surrounded by urban development." By this definition, all new development in Seattle between now and 2000 would be infill, plus some portion of the growth in suburban cities and unincorporated King County.

Using community planning areas with substantial existing development and arbitrarily defining all development in, for example, Shoreline, Highline, Federal Way and East Side (the most heavily developed areas in the county) as infill, it appears that historically a large proportion of new development falls into the "infill" category. Between 1979 and 1984, over 36 percent of all dwelling units built in unincorporated King County were located in these four "infill" community planning areas.

Another approach would be to assume that all development on parcels below a certain size constitutes "infill," and then look at the size distribution of both vacant land parcels and development projects in western King County. Using the King County Assessor's computerized inventory of buildable "Vacant Residential Lots and Acres" (dated 9-16-81) as a rough indicator of the character of vacant developable land that will be available at any given time, it appears that most land in unincorporated western King County (Range 5 and west less Vashon Island, or roughly the proposed urban growth area) is in small to medium parcels. For example, about 19 percent of the parcels and 30 percent of the acreage are in parcels of between 1 and 5 acres, and 7 percent of the parcels and 56 percent of the acreage are in parcels of between 5 and 35 acres; the average size of all parcels between 1 and 35 acres is about 12 acres.

Using subdivision activity as an indicator for all development, Land Development Information System (LDIS) data on subdivision applications in unincorporated western King County for 1979 and 1980 show that a substantial portion of the activity occurs on small parcels. About 83 percent of 1979-1980 formal plat applications, and 48 percent of the lots proposed, involved parcels of less than 20 acres. Over 36 percent of the applications and about 10 percent of the lots involved parcels of less than 5 acres, and over 28 percent of the applications and 18 percent of the lots involved parcels of between 5 and 10 acres. More recent data show the average formal plat recorded in Western King County during 1978-1983 had an area of 14.25 acres. The comparable average short plat had an area of 4.7 acres.

If one arbitrarily defines "infill" as development in western King County on parcels of less than 5 acres (or less than 10 acres, or less than 20 acres, or whatever), then a substantial portion of new development activity in the recent past could be considered infill, and it could be assumed that this would continue in the future. But, to reiterate,

without a generally agreed-upon quantified definition of infill and its application to both past data and development forecasts, specific conclusions are not possible, and therefore were not made in the Draft EIS.

The Draft EIS did discuss the impacts of infill, although not all in one place. These impacts include potential adverse impacts on noise (p.122), traffic (p.163), environmentally sensitive areas (p.79), air quality (pp. 89, 92), water quality (p.105), transit (p.164) and public service costs (p.215). Mitigating measures were discussed generally for each type of impact.

1h. The Draft EIS contains no data and analysis of the rationale for the boundary lines between urban/suburban communities (urban areas in the proposed action) and the growth reserve (transitional growth areas in the proposed action) and between growth reserve and rural areas. (Land Use Research Council 1981, Burlington Northern 1981, Weyerhaeuser 1984) How was the urban/rural line arrived at for the (Executive Proposed) GDG map? (Weyerhaeuser 1984)

Response: The Executive Proposed General Development Guide contained the basic criteria used to designate urban and rural areas, and resource lands (farmlands and commercial forests) on the proposed Comprehensive Plan Map. These criteria were retained in the proposed King County Comprehensive Plan--1985. The criteria for Urban Area designations are:

1. Natural features and land characteristics are capable of supporting urban development without significant environmental degradation.
2. Public facilities and services (such as transportation, sewers, fire and police protection) are in place, or can be provided at reasonable cost, to accommodate urban growth.
3. Opportunities exist for a local balance of housing, jobs and shopping, for convenient transportation and energy efficiency.
4. King County and the cities have made firm commitments to urban development and urban services in the area.

The Executive Proposed Guide's basis for Rural area designations (also retained in the Comprehensive Plan--1985) is that the area be currently rural and meet one or more of these criteria:

1. Good opportunities exist for small-scale farming and forestry.
2. A Rural Area designation will help buffer nearby Resource Lands from conflicting urban uses.
3. There are major physical barriers to providing urban services at reasonable cost.

4. Significant environmental constraints make the area generally unsuitable for intensive urban development.

The Executive Proposed Guide put larger-scale farmlands and commercial forests into a separate Resource Lands designation, whereas the 1981 second draft Guide combined them. The Guide's Resource Land designation criteria (also retained in the Comprehensive Plan--1985) are:

1. The area has high natural resource value (good soils for farming or forestry, or good mineral deposits).
2. The land is in undivided parcels large enough to make resource management feasible.
3. The area is actively farmed or being managed for forestry or mineral extraction.
4. There is little or no conflict with adjacent land uses.

Specific boundaries for designated agricultural production districts were developed in cooperation with the King County Office of Agriculture. Specific boundaries for forest production districts were developed in cooperation with the timber industry.

The proposed Comprehensive Plan's map designations differ somewhat from the Executive Proposed General Development Guide in the exact location of Rural Area and Resource Land boundaries, but are generally consistent. The Comprehensive Plan--1985 also differs from the Guide by establishing a Transitional Growth Area between Urban and Rural Areas very similar to the 1981 second draft Guide's Growth Reserve designation. The Transitional Growth Area is intended to be redesignated as either Urban or Rural through community plans. The boundaries between Urban and Transitional Growth Areas are defined by adopted community plans and plan revisions.

Since the community plans are not all completed, the proposed initial boundary between designated Urban and Transitional Growth Areas is based on the lines drawn by completed community plans and on the Local Service Area (LSA) boundaries for public sewers established by the Sewerage General Plan, adopted in January, 1979. The data on vacant land and land consumption rates underlying the LSA boundaries was summarized in the Final EIS for the Sewerage General Plan, published in November, 1978. This information was updated as part of the Planning Division's Supply-Demand Study (November, 1979), updated again in 1983 and 1984 in the Annual Growth Report, using the computerized Land Development Information System (LDIS), and will be monitored and updated in future Annual Growth Reports. The criteria and rationale for the LSA boundaries are set forth in Section 3.2 of the Sewerage General Plan.

Until community plans are completed or updated, sewer service areas are used as the basis for designating Urban Areas because under current federal and state sanitation standards, federal and state water quality standards, and available technology, sewers are usually a

physical necessity for urban-density development. See pp. 41, 42, 126-131 and 209-211 of the Draft EIS for data on acreage and development activity in the urban/suburban and growth reserve areas depicted in the second draft Guide. See Section II above for residential capacity of the Urban and Transitional Growth Areas proposed in the King County Comprehensive Plan--1985.

The criteria for the Executive Proposed Guide's designations are explained in greater detail, including their application to specific areas of the county, in the Technical Appendix which was published in July, 1984. The Technical Appendix contains the mapped data which were used to apply the criteria, and which were available for public inspection when the Guide was formally proposed by the King County Executive to the County Council (April, 1984). Also see 22b.

li. What assurance is there that the county's Land Development Information System (LDIS) will be effective in monitoring development in a way that enables the county to respond in time to changing conditions by expanding the urban area into transitional growth areas? Will LDIS divert staff resources needed to process permits expeditiously? Is the county committed to funding LDIS? (Weyerhaeuser 1981) The LDIS does not collect detailed enough information to allow King County to manage the market for the different types of land needed to accommodate growth. (Seattle Master Builders 1984)

Response: Neither the Executive Proposed General Development Guide nor the Council's proposed Comprehensive Plan--1985 purport to manage land markets; under either version of the proposed action there would be at least as much (if not more) zoned capacity for new development as under the existing 1964 Comprehensive Plan. See Section II above, and pp. 61-66 of the Draft Supplemental EIS. Redesignation of Transitional Growth Areas to Urban Areas will be based on availability of adequate facilities and services, not land supply.

The LDIS, which would be the primary monitoring mechanism used to provide up to date information on growth and development activity, has been in place and functioning since 1979. It provides current data on land consumption through building permit, subdivision and rezone activity. Using the Annual Growth Report (first published in 1983), periodic LDIS reports, and scheduled community plan revisions, the County will have ample opportunity to continually assess the validity of current land use designations.

The LDIS program is part of the Planning Division. Permit processing is the responsibility of the Building and Land Development Division (BALD); both divisions are in the Department of Planning and Community Development. LDIS staffing is funded completely separately from BALD permit review staff; LDIS offers both current and future productivity benefits to the County and to private sector users that make its continuation important to the Department -- including its potential for improving the permit review process.

The level of detail in LDIS data is being improved over time as resources allow and in response to user needs. The Department is studying the option of monitoring land consumption by zone classification (rather than the present broader categories) beginning in 1986.

Legal Role of Planning

1j. Throughout the discussion of the GDG, it is apparent that King County is making the assumption that the comprehensive plan will be the legal basis for land development and growth in King County. This is contrary to state law which mandates that the zoning code is the legal responsibility for land development. Does King County intend to change state law to require comprehensive plans to take precedent over zoning codes such as in the state of Oregon? (Weyerhaeuser 1984)

Response: Both the second draft and Executive Proposed Guide clearly stated that land uses are regulated by zoning, subdivision and other codes, which in turn are to be consistent with the Comprehensive Plan policies and map. This is amplified in the proposed Comprehensive Plan--1985 (see policies PI-204, 205, and 207). Where codes conflict with the plan, they continue to govern and are to be amended to conform to the Comprehensive Plan. Even though the Comprehensive Plan guides development only through zoning and other regulations, it is the legal basis for land use and development (King County Charter, Article 2, Section 220.20 and Article 3, Section 320.20). If the County did not have home rule, it would use the authority of the State Planning Enabling Act (RCW 36.70). The Act clearly states that comprehensive plans provide the basis for "guiding and regulating the physical development of a county...." (RCW 36.70.010; also see 36.70.340 and 36.70.550).

2. Description of the Proposal

2a. It is false to say, as the Draft EIS does on page 28, that the proposal would have no direct physical impacts, and that these would result only from implementation. (Greater Kingsgate Council 1981, Land Use Research Council 1981) The Executive Proposed Guide has physical impacts which should have been analyzed in the Supplemental Draft EIS. A qualified environmental analysis firm could do this. We had no opportunity to review the original Draft EIS. (Washington Forest Protection Association 1984)

Response: The Draft EIS clearly states that although the proposal is a nonproject action, physical impacts are imputed to it even though these would result from separable implementation actions (see Draft EIS, pp. 68 to 139). Also see 1b. The Draft EIS included extensive discussion of the impacts of the proposal on the physical environment (pp 68-142). This analysis was performed by John Graham and Company, an established planning, architectural and engineering firm. The Washington Forest Protection Association was on the distribution list for the original Draft EIS (p. 8); when the Supplemental Draft EIS was issued, copies

of the original Draft EIS accompanied those copies of the supplement sent to libraries and were available for inspection or purchase throughout the comment period (Supplemental Draft EIS, p. 4).

2b. The Draft EIS does not spell out in enough detail the relationship between the proposed General Development Guide and community plans. (Hillis et al. 1981, Burlington Northern 1981, Weyerhaeuser 1981, 1984)

Response: The Draft EIS set out the recommended relationship between the Guide and community plans (pp. 49-50). While some of the terminology has changed in the subsequent versions of the proposed action, this analysis remains valid. The Supplemental Draft EIS specifically relates the proposed plan concept designations (urban, rural and resource land) to each of the adopted and pending community plans (pp. 41-44). The Council's proposed Comprehensive Plan--1985 differs from the Executive Proposed Guide in its impact on community plans most importantly in that it includes Transitional Growth Areas as a new plan concept land use designation with its current boundaries mostly based on previously adopted community plan), and in that the Council is considering having adopted community plans brought into compliance with the Comprehensive Plan during their regularly scheduled revisions, rather than through an accelerated revision process.

Reviewers of both the original Draft and Supplemental EISs, and the Comprehensive Plan itself, also should bear in mind that functional plans, community plans, and any measures implementing such plans would be separate actions and their impacts would be separately evaluated under SEPA in more detail than is possible now (WAC 197-11-060(5) and 197-11-443). Also see 1a, 1c, 22a and 22c.

2c. The Draft EIS is not specific enough in spelling out the relationship between the proposed General Development Guide (GDG) and other plans such as the PSCOG Subregional Plan, other counties and the plans of incorporated cities and towns. The GDG seems to assume that incorporated areas will take the growth displaced from the growth reserve and rural areas. This section should relate the Guide to Metro's Renton 201 Facility Plan. (Land Use Research Council 1981, Burlington Northern 1981 and 1984, Weyerhaeuser 1981, Metro 1981, Seattle Master Builders 1984, City of Bellevue 1984).

Response: The Puget Sound Council of Governments (PSCOG) and Metro agreed with the Draft EIS's assessment of the Guide's relationship to the Subregional Plan. Cities and special districts commenting directly on the second draft Guide raised specific concerns which were addressed in preparing the Executive Proposed Guide and the Council's proposed Comprehensive Plan. Also see 1a.

The General Development Guide, (both second draft and the Executive's 1984 proposal) and both Draft and Supplemental EISs assume that a greater proportion of growth will continue to locate in unincorporated King County than in all cities combined (Guide, Figure I-4; Draft EIS,

p. 146; Supplemental Draft EIS, pp. 56-61). The intent of the proposed action would be to locate most new growth in designated urban areas, incorporated and unincorporated. Forecasts indicate this would happen with or without the proposed action, but probably to a lesser degree without the proposed action. Since the county is committed to accommodating growth (Motion 4152), unincorporated urban areas would grow to accept any new population and employment that does not locate in cities or other nearby counties. The proposed plan's policies say cities are ideal locations for growth (consistent with the motion adopted June 6, 1984 by the Suburban Cities Association), but calculations of the County's capacity for growth do not assume any shift in the preparation of growth going to cities. The suburban cities have adopted the PSCOG forecasts, and their adopted land use plans provide enough total capacity to meet these forecasts.

Metro's Renton 201 Plan is a wastewater management program for the Lake Washington and Green River Basins consisting of expansion of the Renton Sewage Treatment Plant's secondary treatment capacity from 36 million gallons per day (MGD) to 72 MGD and construction of a tunnel and outfall for discharge of treated effluent into Puget Sound. Based on the information in the Plan itself (July, 1981) and its final EIS (August, 1981), the 201 Plan's growth and land use assumptions for the service area are consistent with both the proposed action and adopted county policy (e.g. the Sewerage General Plan). The 201 Plan also advocates an equitable distribution of the public costs of growth. Potentially inequitable distribution of the 201 Plan's costs between existing and new residents, and possible need for reevaluation of Metro's pricing structure, are acknowledged in the 201 Plan's Final EIS. For an elaboration of these points, see Metro's 201 Plan Final EIS, particularly King County's comments on the Draft EIS (201 Plan Final EIS, pp. 360-365).

3. Earth

3a. It would be helpful to have a composite map of all environmentally sensitive areas in relation to the plan map. (Land Use Research Council 1981)

Response: The Planning Division can display to elected decision-makers and interested citizens overlays of various sensitive areas on the proposed plan map using the originals on file in the Division. It was found that a composite map of sensitive areas showing all of them with the plan concept, especially at the small size needed for publication in the EIS, would be more confusing than separate maps unless much more expense were incurred (e.g., multiple color transparencies). The open space element of the plan map (see DEIS Map 1) gives a general idea of the location of all sensitive areas in relation to the plan concept. This map overlays all the sensitive area maps along with the other parts of the open space system such as parks, farmlands and forest areas.

3b. The Draft EIS has no statistics on the amount of acreage encumbered by sensitive areas; this would be helpful in visualizing the open space system and in assessing how the recommended land use pattern would be constrained by sensitive areas. (Land Use Research Council 1981)

Response: Such data has not been collected for all types of sensitive areas. The Draft EIS did not include the available acreage statistics on environmentally constrained land for two reasons. First, the information available indicates that, given the amount of vacant, unconstrained land in western King County, the location rather than amount of such constrained land is the relevant factor for land use planning. For example, the County's Vacant Land Inventory (VLI), first done in 1977 and updated periodically, indicates that 22 to 25 percent of the land within the sewer Local Service Area in unincorporated western King County has some type of environmental constraint. Severely constrained lands, however, were excluded from calculations of zoned capacity for growth (supplemental Draft EIS, pp. 61-66, and Section II above).

Some of these constrained lands have open space value (e.g., some steep slopes, floodplains), some are very hazardous for development (slide-prone slopes, floodplains, coal mine hazard areas), and some are developable with proper building practices (seismic and erosion hazard areas). Based on available data, the proportion of unbuildable areas is very small; for example, Class III landslide hazard areas, which are assumed to be unbuildable for purposes of estimating land supply, take up less than 5 percent of the land area in the 14 USGS Quadrangles for which detailed data are available. The 1972 Policy Development Commission report appended to Ordinance 1096 (Open Space Policies) has even more general county-wide acreage figures for steep slopes, floodplains, farmlands, etc., if such data are of interest.

The second reason the EIS used maps rather than statistics is that maps are more useful than tables of numbers in visualizing the open space system and seeing how it relates to the recommended plan concept.

3c. The Draft EIS says that the Guide would both reduce development pressure on hazardous areas in newly developing communities and increase pressure on such areas in existing communities where infill occurs. This is contradictory. (Land Use Research Council 1981)

Response: The Draft EIS acknowledges that uniform regulations for land use and sensitive areas will have different impacts in different parts of the county. A policy of encouraging infill could put more pressure on sensitive areas in older communities, since they would have less vacant land than newly developing communities, and therefore developers would be more likely to conduct the engineering studies required by the Sensitive Areas Ordinance so they could develop such parcels. Also, parcel sizes in built-up areas are smaller than in newly developing areas, so techniques like clustering to avoid development on environmental features such as slopes would be less feasible.

3d. What is the basis for the erosion hazard map (EIS Map 6)? Our field experience indicates inaccuracies that need correction prior to using the map for land use decisions. (Burlington Northern 1981)

Response: The map is based on US Soil Conservation Service data. The hazard map is used only as a general indicator of potential problems. Erosion hazard mitigating conditions are imposed primarily at the building permit stage, when site specific soil data are available to the developer, and therefore to the county (K.C.C 21.54.130 and .140).

3e. The top of page 52 talks of prohibiting development on steep slopes and along lakes and streams, etc. The EIS should address the taxes lost and the deterioration in quality of new-home living lost when homes cannot be built on unobstructed-view sites or on waterfront sites where the owner is allowed to replace blackberries and alder with lawns and domestic shrubs. There is no reason why, with proper soil study and mitigating measures, homes can't be built on many steep slopes. And if the Sammamish River can be cleared of brush by the government, why cannot private property owners do likewise along their streams? (Keesling 1984)

Response: If the proposed Comprehensive Plan is adopted in present form, existing regulations would need to be strengthened to prohibit development in Class III landslide hazard areas, coal mine hazard areas where mitigation is impossible, slopes steeper than 40 percent, and Unique/Outstanding and Significant wetlands.

"Quality in new-home living" is an unquantifiable variable which must be considered along with other quality-of-life considerations such as environmental and open space protection and protection of public safety. Development in environmentally sensitive areas also has monetary costs to property owners and the taxpayers in general.

The taxes lost by not allowing development on view lots in Class III landslide hazard areas, for example, need to be balanced against the public and private costs incurred when soil slippage does occur, despite expensive engineering precautions. A recent dramatic example of this occurred in the Newport Hills area, beginning in December of 1983, when heavy rains led to mudslides that threatened several homes. Apart from losses suffered by homeowners, King County taxpayers paid \$2.8 million for remedial measures to stabilize ground and control runoff. In addition, over the last four years King County has incurred about \$1.5 million in road repair and rebuilding costs directly attributable to location of roads in Class III landslide hazard areas. The property taxes paid on residential development in landslide hazard areas cannot even come close to meeting costs of this magnitude. If one assumed the entire cost of remedial measure required at Newport Hills would be paid for by residential development in hazardous areas, based on recent levels of taxation and percentage of taxes levied in unincorporated areas, it would take the entire County share of the levy on the next 7,000 new homes in hazardous area, valued at \$200,000 each, to make up the \$2.8 million. (The recent unincorporated area levy averages about one percent of total valuation; the total County share of the levy is about 20 percent; \$2.8 million divided by .2 percent equals \$1.4 billion; \$1.4 billion divided by \$200,000 equals 7,000.) This is a very simplistic calculation for illustration only, since several parts of the

County levy are earmarked for specific purposes such as libraries, emergency medical services, etc. In addition, 7,000 such residences would not come on the market in time to meet the cost of the Newport Hills slide.

Regarding brush removal on the Sammamish River and other streams, it was public concern about such projects as the "canalization" of the Sammamish River, with their adverse effects on fish habitat and aesthetics, which led to the Shoreline Management Act of 1971.

4. Air

4a. The Draft EIS is incorrect in stating that "the level of monitoring available is inadequate" for directly evaluating the extent of violations. There is adequate monitoring to establish nonattainment areas. (Puget Sound Air Pollution Control Agency, [PSAPCA])

Response: This statement in the EIS means that exact air quality conditions in specific urban centers are not discussed since data are not available for all areas. We agree with PSAPCA that the level of monitoring available is adequate to establish nonattainment areas, and to allow prediction of impacts on a general scale.

4b. The impact summary (p. 24) states that if the Guide succeeded in achieving a local jobs/population balance, total air pollution from autos would be reduced; this does not seem possible in light of the amount of growth in population--and therefore traffic--projected. (Hillis et al. 1981)

Response: The reduction (referred to as a possibility rather than a certainty) would be for future total pollution county-wide compared with "no action." The EIS also points out that local increases in residential and employment densities could result in local air quality degradation compared with "no action." See pp. 89-92 of the Draft EIS for a detailed discussion.

4c. The following technical comments on the original Draft EIS also were made by the Puget Sound Air Pollution Control Agency:

Page 83: It should be noted that in 1979, there were only two sulfur dioxide monitoring stations in the Green River Valley. One station reported a single violation of one of the agency's hourly standards. No federal standards were violated. There are no non-attainment areas for sulfur dioxide in this region.

Response: Acknowledged.

Page 83: In the discussion of particulate sizes, the unit "mg" is incorrect. The author may mean "micrometers".

Response: The correct unit is "microns."

Page 84: With respect to the statement "motorized vehicles are a relatively minor source of TSP", it should be noted that this applies only to tail pipe emissions. Air entrainment of dust which is derived from dried mud deposited on roads due to the movement of motor vehicles, has been found to be significant.

Response: Acknowledged.

Page 87: Hydrocarbon emissions are controlled directly by this Agency's Regulation II which controls the emission of volatile organic compounds which have been found to enter into photochemical reactions. This Agency and the State of Washington have rescinded their hydrocarbon standards, and the Federal Government appears to be going through a similar process.

Response: Acknowledged.

4d. The Supplemental DEIS addresses the air quality implications of the Guide. The Guide itself, however, does not adequately describe the air quality benefits of its proposed plan concept. (Puget Sound Air Pollution Control Agency 1984)

Response: The proposed Comprehensive Plan--1985 contains statements relating air quality to the plan concept in Chapter Four (Environment and Open Space) and the transportation section of Chapter Eight (Facilities and Services).

5. Water

5a. Although recreational access is allowed by the United States on federal lands within Tacoma's watershed (page 95, Figure 8), it should be pointed out that most of the federal land is surrounded by other land on which access is not allowed. This effectively prevents most of the federal land from being used recreationally. (City of Tacoma, Department of Public Utilities, Water Division 1981)

Response: Acknowledged.

5b. More recent studies have been conducted which contradict Lee's study of limited public access to watersheds (p.103, 1st paragraph). Lee's study dealt with viral contamination of the water supply. Since 1970, serious concerns have been raised about protozoan contamination, and the transmission of diseases such as Giardiasis. The protozoan which causes this disease is presently found in many of the public waters of the State that are open to public access (City of Tacoma 1981).

Response: Acknowledged.

5c. The following technical comments on the water quality in the original Draft EIS were made by Metro:

Page 104, first paragraph: The underlined phrases should be added to the first sentence:

"Indiscriminate removal of vegetation, on either a small or large scale, and introduction of buildings and other impervious surfaces without adequate storm water controls, are the main causes of degradation of natural water systems in King County."

Page 105, top paragraph, second sentence: We suggest the following alternate wording:

"The cumulative impacts on water quality from new developments have occurred largely due to the County's need for financial resources to enforce existing ordinances for storm water drainage control."

Page 105, third paragraph, line 8: We recommend that the following sentence be inserted before the last sentence:

"Further impacts could be mitigated with implementation of coordinated programs for storm water drainage management (accommodated through expansion of Policy NE-330) and enforcement of storm water drainage control ordinances."

Page 106, top paragraph, last sentence: We suggest that this sentence be replaced with the following:

"The Guide should call for the implementation of a coordinated program for storm water drainage management which would generate revenues which could be used for funding continued planning and operation and maintenance of drainage control facilities."

Page 107, bottom paragraph: The following sentence should be added at the end of this paragraph:

"Enforcement of the Sensitive Areas Ordinance can protect water quality from potential impacts associated with new development occurring in these basins."

Response: Acknowledged.

5d. In general, the Supplemental Draft EIS satisfactorily addresses METRO's interests in wastewater treatment and water quality. (METRO 1984)

Response: Acknowledged.

5e. On page 106 you state, "For example, if an entire drainage basin is urbanized, preserving a strip of vegetation along a stream may enhance an area's aesthetics but would have little effect on water quality." This may not always be the case. A northern California study on sedimentation, "Evaluation of Streamside Bufferstrips for Protecting Aquatic Organisms" by Erman, Newbold, and Roby (1977), showed that logging impacts could be detected upon aquatic insect communities when buffer strips less than 30 meters were left. However, when at least 30 meters of vegetation was left next to the stream, logging impacts could not be detected. Aquatic insects depend upon the proper ratio of organic and inorganic bottom sediments. Therefore, it appears 100-foot buffers would provide significant stream protection from the impacts of silt. (Washington State Department of Game 1981)

Response: The statement in the Draft EIS should have been qualified, as it was predicated on a lack of adequate on-site controls for most development within a basin. The Planning Division has similar information indicating that with proper on-site systems in place in an urbanized area, even a relatively narrow buffer can be significant in maintaining such stream functions as fish habitat.

5f. The Department of Game had the following additional comments on the original Draft EIS.

Page 107: There are many more waters of primary importance to the anadromous fish resources than you list.

Response: The EIS mentioned only the major basins to give a summary overview; it is acknowledged that within these basins there are many subbasins and smaller streams. The designations of fish-bearing streams for the purpose of additional environmental review of projects under the county's Sensitive Areas Ordinance include all small streams enumerated in the latest State Department of Fisheries "Catalogue of Washington Streams and Salmon Utilization."

Page 117: Basin planning policies are very important. Coordinated planning efforts will be valuable for ultimate resource protection.

Response: Acknowledged.

5g. The Department of Game also made detailed comments and recommendations regarding water quality and wildlife habitat in its comments on the Supplemental Draft EIS and the Executive Proposed General Development Guide. (Washington State Department of Game 1984)

Response: Acknowledged. The proposed plan's environmental policies are consistent with the Department of Game's objectives, but are neces-

sarily general. The Department's detailed suggestions will be considered when specific regulations such as the Sensitive Areas Ordinance are adopted or revised to implement the Comprehensive Plan.

6. Flora and Fauna

6a. *The Supplemental Draft EIS does not analyse the impacts of the proposed forest management and shoreline policies on flora and fauna. (Washington Forest Protection Association 1984)*

Response: See 2a.

7. Noise (No comment received)

8. Light and Glare (No comment received)

9. Land Use and Land Consumption

Land Supply

9a. *The Draft EIS's analysis of land supply using current zoning as a measure of capacity is incorrect because 1) zoning changes are proposed to implement the Guide, and 2) zoning is not the only determinant of capacity, since the Guide would require numerous services to be available as well. (Burlington Northern 1981, Land Use Research Council 1981)*

Response: Section II above, and pages 61-66 of the Supplemental Draft EIS respectively, show estimated land capacity under the Council's proposed Comprehensive Plan--1985 and the Executive Proposed General Development Guide with some general assumptions about residential zoning changes. These later analyses conclude that under either proposal, total (urban and rural) capacity for growth (45 to 65 years at current rates) would be close to that provided by the existing 1964 Comprehensive Plan or "no action" alternative (65 years). Both sets of analysis include explicit assumptions about the acreage of land which could be rezoned to either higher or lower densities as a result of adopting and implementing a new land use plan for the County.

The question of adequate facilities and services affects existing as well as new residents, and involves both on-site and off-site capacity. Availability of such facilities and services can determine how and when, or if, vacant land will be developed, but is a separate question from the supply and capacity of the land itself.

9b. *The Draft and Supplemental EISs fail to address the issue of actual land availability, as opposed to hypothetical land supply. (Keesling testimony 1981, 1984, Land Use Research Council 1981, Seattle Master Builders 1984)*

Response: "Land supply" is not the same as "land availability." The Draft and Supplemental EISs use the term "land supply" to mean land

which is currently undeveloped and free of environmental hazards. The term "land availability" narrows the idea of land supply to that land which is offered for sale at prices buyers are willing to pay at any given time. This is primarily a function of the private market, not of a land use plan. The Department concludes that with the total supply of vacant land in the designated urban growth area, enough land will be available at any given time for a normal land market to function.

9c. The Draft EIS hypothesizes that land consumption for urban/suburban development could be reduced by 50 percent (over no action) if an average density of 7 dwellings per acre were achieved (p. 133). However, in the same sentence, the Draft EIS states that the Guide does not assume a significant decrease in land consumption rates. The Draft EIS analysis here does not support the statement that "the main difference between no action and the Guide would be in rates of land consumption." (p. 139) This is not reconcilable with the Draft EIS' assumption of an insignificant decrease in land consumption rates. (Land Use Research Council 1981)

Response: The Draft EIS said the intended impact of the second draft Guide would be to reduce land consumption by about 50 percent, but that to assure continued operation of a normal land market, the initial boundary between designated urban/suburban communities and growth reserve assumed no significant reduction in land consumption rates.

See 9a above, Section II above, and pp. 61 to 66 of the Supplemental Draft EIS for more discussion of potential growth capacity under different alternatives, including the proposed action and "no action." Also see 10a and 13f.

9d. The land consumption rates assumed in the Draft EIS for the Growth Reserve area: 1) are not soundly based, and 2) the five-acre lots required by the Guide would increase rather than decrease residential sprawl. (Burlington Northern 1981, Weyerhaeuser 1981, Hillis et al. 1981)

The Council's proposed King County Comprehensive Plan--1985 includes a separate plan concept designation for Transitional Growth Areas, similar to the second draft Guide's Growth Reserve, where interim development densities will be kept low until either urban services can be provided or a rural designation is applied. Community plans will be the primary means of redesignating Transitional Growth Areas.

The proposed residential density in the Transitional Growth Area of one dwelling per 5 acres is an average density. The proposed plan (Policy R-211, p. 54) encourages clustering at this overall density and the preservation of large tracts that can be developed when urban growth becomes appropriate.

One problem is the definition of "consumption" at low densities such as the 1 dwelling per 5 acres proposed in the Transitional Growth Area. A house on a 5-acre lot may be said to presently "consume" more land than a house on a 1-acre or 5,000 square-foot lot, but the 5-acre lot

has much more potential for resubdivision and redevelopment at higher densities than the smaller lots do. The five-acre lots also would preserve the option of a rural designation where appropriate. Clustering at a low density, as currently required in the GR-5 zone, would result in even larger "reserve tracts" with the capacity for more growth when an area is appropriate for redesignation as Urban. It is this potential and capacity for resubdivision and redevelopment that the low density policy is intended to protect. Also see 10d.

9e. The Supplemental Draft EIS errs by including 14,000 to 15,000 acres of forest land which is not intended to develop under the plan, thus overstating capacity by 1400 to 1500 units. Another source of error is inclusion of areas such as Hollywood Hills where densities are limited by plat restriction. (Keesling 1984)

Response: The Supplemental Draft EIS did not count F-R zoned land as residential. Since the proposed density policy for designated forest production districts is one dwelling per 80 acres versus one dwelling per 10 acres in the capacity analysis, this means the EIS would have overstated rural growth capacity by a maximum of about five percent, and total capacity by a maximum of about .3 percent, if it had counted F-R zoned land. Regarding such areas as Hollywood Hills, the analysis excludes all platted lots with homes on them; undeveloped platted lots are assumed to develop at trend ("no action") densities, which includes areas with existing 1-acre lots (SE and G zoning). Also see Section 11 above.

9f. The Draft EIS's description of the proposal's land use impacts in urban/suburban areas emphasizes costs and benefits to developers; community costs and benefits also must be weighed. (POW 1981, Greater Kingsgate Council 1981, Mike Husa testimony 1981)

Response: See pp. 200-208 of the Draft EIS for a summary discussion of public service costs, energy and housing price impacts of alternative growth scenarios. Also see pp. 66-108 of the Supplemental Draft EIS. See section 1f above for a discussion of adverse impacts of infill. The Draft EIS does say that much of the short-run economic benefit of allowing higher densities (and of such measures as streamlined permit review processes) would accrue in the form of cost savings to the development industry. Depending on market conditions, a large or small part of these savings would be passed on to housing consumers and renters or buyers of commercial development. Community benefits would be long-term lower per-household service costs and better energy conservation.

It is acknowledged that standard analysis and regulation of such quantifiable variables as traffic, air and water quality, or even fiscal balance and adequate public facilities, do not address potential long-term social changes a community may experience due to growth. Such changes may be viewed as good or bad by different groups in a community, or by future newcomers and existing community residents. To the extent that such changes have environmental and fiscal impacts, they can be dealt

with on a case-by-case basis for major projects through the SEPA process (WAC 197-11-448).

9g. *The Draft EIS does not address the land use conflicts between timberland management and nearby residential development. (Burlington Northern 1981, Weyerhaeuser 1981)*

Response: The Comprehensive Plan--1985 separates Resource Lands from Rural Areas with residential development, unlike the second draft Guide. These conflicts were addressed in the Draft EIS, and are one of the main reasons for establishing designated forest production areas where such conflicts would be precluded. (See Draft EIS, pp. 30, 60, 138, 139, 140, 141 and Comprehensive Plan--1985, pp. 89-90).

10. Natural Resources

(Note: this section includes comments directed to other sections that seemed to deal primarily with timber as a natural resource.)

10a. *The Draft EIS (p. 141, Impacts) should say that the Guide will attempt to enhance long-term forestry by protecting rural timberlands from encroaching suburban development. (Burlington Northern 1981)*

Response: Acknowledged. Given the policy/legislative nature of the proposal, it is reasonable to read the whole EIS with a similar interpretation whenever it mentions intended results of the Comprehensive Plan.

10b. *In many areas of the (proposed) growth reserve and rural areas, forest lands are not capable of being used for profitable harvest due to population pressure and conflicting nearby land uses; suitability of land for forestry must consider this aspect as well as soils and other physical conditions. (Burlington Northern 1981, Weyerhaeuser 1981)*

Response: Preventing land use conflicts from interfering with commercial forest lands enjoying reduced property taxes under state law was a primary basis for establishing a designated rural area as proposed in the second draft Guide. As noted in 9g above, the proposal was modified to separate Resource Lands from rural residential uses. Lack of conflict with nearby land uses is an important criterion used to designate forest production districts in the Executive Proposed Guide and the Council's Comprehensive Plan--1985. Also see 1h above.

10c. *The Draft EIS does not discuss allowing extractive industries to locate near growth areas. This provision would help to achieve the County's goal of providing efficient housing while supporting the use of productive resources. If extraction of these resources is allowed close to growth areas, transportation costs will be minimized, and competition between producers will tend to keep prices down. (Burlington Northern 1981, Weyerhaeuser 1984)*

Response: See paragraph 3 p. 140, and paragraph 4 p. 141, of the Draft EIS. These paragraphs discuss availability and location of sand, gravel and bulk fill with respect to new construction. The Comprehensive Plan--1985 proposes a separate designation for mining sites, comparable to agricultural and forest production districts. The new criteria do not limit mining to Rural Areas.

10d. Five-acre lots are not large enough to produce a commercial stand of trees. The sentence in the second paragraph, p. 138, is misleading on this point. (Burlington Northern 1981)

Response: The intent of mentioning trees and agricultural crops was to point out that a rural residential development pattern of five-acre lots could have a visual quality (and perhaps some physical impacts such as stormwater runoff) similar to unplatted open space, not to imply that large-scale commercial farming or forestry was possible on five-acre lots. It should be noted that a contiguous ownership of twenty acres is part of the eligibility requirement for forest land valuation under the state law (RCW 84.33.100), and that five acres is the minimum for eligibility as "timberland" under the Open Space Taxation Act (RCW 84.34.020(3)). The Comprehensive Plan--1985 proposes an eighty-acre minimum lot size for commercial forest land, because this is an important "threshold" parcel size for efficient forest practices.

10e. The Draft EIS should explain why conversion of forest lands to urban development is considered unacceptable. (Burlington Northern 1981)

Response: The benefits of forestry that the proposed action (and existing amendments to the 1964 Plan) seeks to perpetuate include long-term economic base and such "residual" open space benefits from timberlands as wildlife habitat, watershed protection, outdoor recreation and scenic values. This rationale is also expressed as part of the Washington State Legislature's basis for giving commercial timberlands extremely favorable property tax treatment (RCW 84.33.010(1)):

"The public welfare requires that this state's system for taxation of timber and forest lands be modernized to assure the citizens of this state and its future generations the advantages to be derived from the continuous production of timber and forest products from the significant area of privately owned forests in this state. It is this state's policy to encourage forestry and restocking and reforestation of such forests so that present and future generations will enjoy the benefits which forest areas provide in enhancing water supply, in minimizing soil erosion, storm and flood damage to persons or property, in providing a habitat for wild game, in providing scenic and recreational spaces, in maintaining land areas whose forests contribute to the natural ecological equilibrium, and in providing employment and profits to its citizens and raw material for products needed by everyone."

Also see 23e.

10f. Explain how a resource company can change the use of forest lands if they no longer meet the economic criteria for resource management. Also identify the necessary evaluations (or) studies needed to designate significant mineral resources by King County. Explain why a 80-acre minimum lot size has been designated for forest lands in the GDG. Also why are 35-acre and 15-acre lot sizes proposed for agriculture? (Weyerhaeuser 1984)

Response: The Executive Proposed Guide provided for amending Resource Land designations if they were applied in error. The proposed Comprehensive Plan--1985 includes language, drafted by the Washington Forest Protection Association, providing for redesignation of forest production districts when forestry is no longer feasible (Chapter Three, policy PI-113).

Chapter Seven (Resource Lands) of the Comprehensive Plan--1985 includes a discussion of the inventory and study that will be done as part of a mineral resources functional plan.

The 80-acre minimum parcel size for designated forest production districts is based on several factors. First, studies in Washington and other states consistently show that active forestry is more profitable and more likely to continue, on larger rather than smaller parcels. In King County, a threshold of predominantly 80-acre or larger parcels was used to determine designated forest production districts; lowering the threshold, for example to 20 acres, would have brought much more land into the forest category, in smaller parcels closer to existing rural towns and rural residential development. LDIS data indicate a significant increase in conversion rates once parcel size drops below 80 acres.

The 35-acre and 15-acre parcel sizes for agriculture were chosen based on data from the King County Office of Agriculture which indicates these are parcel sizes which can sustain economic dairy farming and horticulture, respectively, in King County. The Comprehensive Plan--1985 provides for 10-acre parcel sizes for farmlands used for horticulture.

11. Population

11a. The population forecasts used in the Draft EIS 1) are not broken down for areas smaller than unincorporated King County, and 2) four different population forecasts are used. Since the County says it will accommodate actual growth, the forecasts do not really matter much. (City of Bellevue 1981, Land Use Research Council 1981)

Response: Population and employment forecasts were used to determine if the plan concept met the test of accommodating expected growth. The purpose of the population forecasts contained in the Draft EIS was to provide an historical perspective to growth and to provide some quantitative estimates of the probable magnitude of future population

growth. These forecasts were not broken down into finer geographic detail for two reasons. First, the boundaries between the urban/sub-urban, growth reserve, and rural areas were based on several factors, including existing development patterns, existing community plans, county-wide goals such as preservation of farm and timber lands, and natural features. Second, updating and revising population forecasts for smaller geographic areas would be part of community planning and the on-going LDIS/Annual Growth Report monitoring process. Forecasts used in adopted and proposed community plans are available as part of the plans on file and/or for sale at the Planning Division, Governmental Research Assistance Library and other public sources.

Rather than displaying only one population forecast, four forecasts were displayed to convey the possible range of population growth that might be expected in the next twenty years. The Land Use Research Council's comment that since King County is going to accommodate growth, "the forecasts do not really matter much" is correct as far as the overall plan concept is concerned. But since an underlying premise is that King County will accommodate actual levels of population and employment growth in a manner consistent with the plan's goals and plan concept, forecasts are needed to help monitor the plan. Which forecasts are chosen is less important, since monitoring actual growth, making needed adjustments to plan map designations and assuring adequate public facilities are part of that strategy, and since long-range (20-year) forecasts are used for planning decisions.

11b. Page 62 states that there is a 60 year supply of land in the unincorporated area. Explain where this statistic was obtained from. How is the statistic supported? Many people in the development industry do not believe the statistic and it needs to be proven. (Weyerhaeuser 1984)

Response: The EIS's capacity estimates are necessarily based on population forecasts and other assumptions about the future (for example, household size and future residential densities); therefore, they cannot be "proven" any more than the forecasts themselves can be. The basis for the capacity estimates is laid out on pages 61 to 66 of the Supplemental EIS. An estimate of the capacity of the Comprehensive Plan--1985, using similar methodology, is included in Section II above.

12. Housing

12a. The Draft EIS does not adequately consider the impact of low-density residential zoning on the scarcity of building lots in the growth reserve and rural area. Scarcity will increase land speculation that will tend to increase land and building lot prices. (Weyerhaeuser 1981, Burlington Northern 1981, Land Use Research Council 1981)

Response: The land use section of the Draft EIS reproduces the results of the King County Supply/Demand Study and later updates, which indicate that the quantity of vacant residentially zoned land in King County exceeds by a wide margin the amount of land required to accommodate population growth into the next century. The capacity

analysis of both the Executive Proposed Guide and the Council's proposed Comprehensive Plan--1985 indicate the designated urban portion of the County under either alternative will accommodate between 37 and 75 years' forecast growth. The residential development activity that would occur in Transitional Growth and Rural Areas would provide variety in choice of lifestyle, but would not be needed to allow the housing market to meet the basic needs of the expected new population.

The Draft EIS pointed out that there may be potential shortages of some types of residentially zoned land in urban/suburban communities (notably multi-family) by 1990; the implementation program accompanying the Executive Proposed Guide recommended zoning changes needed to implement the proposed policies in Urban Areas. The Council's proposed Comprehensive Plan--1985 has the same urban density goal, but would be implemented through regularly scheduled community plans, which may be somewhat slower in meeting demand for higher densities.

Scarcity of building lots is not a function of the size of the existing inventory of vacant land, but a function of the subdivision process. LDIS data indicate that in 1979 and 1980 more building lots were created by subdivision than were consumed by residential building, in both urban and rural areas (EIS, pp. 153-154).

The assertion that the proposed action will increase land prices and hence housing costs through increased speculation is addressed in the Draft EIS (pp. 152 and following) and references cited therein. These studies indicate that there is little impact from growth management programs on land prices if such programs are land development phasing programs, as is the proposed action, and not restrictions on the volume of construction. The Draft EIS contains a discussion of the findings of studies of the effects of land development phasing programs on speculation in the land market and repeats the conclusion of those studies that such programs, by reducing uncertainty in the market, reduce the amount of land speculation.

12b. The Draft EIS assumes incorrectly that the large minimum lot sizes in the Growth Reserve and Rural areas will effectively shift residential demand to the urban-suburban areas without unreasonably increasing housing costs. (Weyerhaeuser 1981, Hillis et al. 1984) The Guide also could result in 1) displacement to urban areas, 2) displacement to rural areas, 3) 5-acre or 20-acre sprawl in reserve and rural areas, 4) more rapid development of existing sub-standard lots, 5) less new construction and demolition and more people living in existing buildings, and 6) displacement of growth to other counties. (Weyerhaeuser 1981)

Response: The Draft EIS discussed at length the impacts of the proposed residential density policies of the proposed second draft Guide and the intent of those policies. This discussion remains valid for both the Executive Proposed Guide and the Comprehensive Plan--1985. The purposes of the proposed residential densities are:

1. To encourage residential development in the Urban Area where a public service infrastructure exists and can be enhanced at lower cost than the construction of a new infrastructure in undeveloped areas.
2. To encourage the phasing of residential development in the Transitional Growth Area with the orderly expansion of the public service infrastructure.
3. To limit residential development in the Rural Area to densities consistent with nearby agricultural/forestry uses, and to densities that do not necessitate the construction of an intensive public service infrastructure.

While it is possible that any or all of the six scenarios described by Weyerhaeuser might occur, scenarios 2 through 5 are not intended results of the proposed action and further, scenarios 4, 5, and 6 could result from such a wide range of causes that they cannot be considered impacts of the proposed action. The working assumption of the EIS is that the plan would be successful in directing most new growth in the county to locate in Urban Areas. Development would be monitored to see if this actually occurs.

The questions posed, beginning in the last paragraph of page 1 of the 1981 comments by Weyerhaeuser, cover a wide range of topics, but can be grouped into three major areas:

1. Questions of fact ("how rapidly has development been occurring in the Growth Reserve and Rural areas?") that are addressed in the Draft EIS to the extent that such information exists (see Figure 19, page 154). In many cases, such as the private owners' reasons for development, the necessary information does not exist, or is part of market research data more appropriately gathered by the development industry than by local government.
2. Questions of hypothetical future events (such as the social significance of a possible rising crime rate as a result of overcrowding) that cannot be answered in any logical fashion because they are based upon unfounded, unproved premises. See 1f above.
3. Questions of future decisions (such as how undesirable shifts in future development patterns would be detected and countered) that cannot be answered now. The Draft EIS discusses the role of the LDIS and the Annual Growth Report in monitoring development activity and their use in future decisions regarding land use planning in the local communities. It is premature to attempt to specify in advance exactly how the county would respond to undesirable changes in future development rates and patterns. The establishment of some "triggering" standard (e.g., "if the frequency of short plats in any year exceeds the historical five-year average by 10 percent, there is a new development pattern requiring a

policy change") would reduce the ability of the county to apply the policies of the proposed plan in a flexible fashion.

12c. The Draft EIS does not adequately discuss the increased housing costs that will result throughout the county from the Guide. (Weyerhaeuser 1981 and 1984, Burlington Northern 1981, Land Use Research Council 1981, Real Estate Governmental Affairs Committee 1981, Hillis et al. 1981 and 1984, POW 1981)

Response: See pp. 148-155 of the Draft EIS, where potential impacts of the proposal (and government regulation in general) are discussed at length. There is no evidence that rapid housing cost increases in King County in the recent past have been the result of local land use regulations; rather, the causes are national in scope, including inflation, interest rates, and demand for housing which outpaced population growth. (see pp. 148-149).

Two additional pieces of information not available to be included in the Draft EIS are consistent with this conclusion. First, Seattle Real Estate Research Committee home price data from 1979 to 1981 by census tract do not indicate a discernable effect in the form of either higher prices or displaced sale activity resulting from the growth reserve zoning (G-5, GR-5, GR-2.5) applied in the Soos Creek Community Plan adopted in November, 1979. These new zones, permitting densities to one dwelling per 2.5 acres or 5 acres, replaced zoning which allowed one dwelling per acre.

Second, a comparison of new home prices by Standard Metropolitan Statistical Area (SMSA) for the years 1972-1981, as compiled by the Federal Home Loan Bank Board, shows no significant differences in either timing or rate of price increases in the Seattle-Everett SMSA, the Houston SMSA (Houston is the one major US city with no zoning) and the national average. A large supply of land appears to offer little or no benefit in reducing housing costs, and promotes a sprawling pattern of growth and expensive public services (Houston is one of the most spread-out cities in the U.S.).

12d. The proposed urban density policy is for 7-8 dwellings per acre. The EIS needs to clarify if this is gross or net, if existing development is included in the average, and if there is a preference for "blanket" densities or a mix of higher and lower densities with a 7-8 unit average. What is the rationale for this density? (Seattle Master Builders 1984)

Response: The Comprehensive Plan--1985 has been rewritten to clarify the urban density policy. The policy refers to an average zoned density of 7-8 units per acre; actual yield may be higher or lower depending on site constraints, single family vs. multifamily, degree of clustering, etc. Please refer to the density chart, Figure R-1, in either the Executive Proposed Guide or the Council's proposed Comprehensive Plan--1985. The policy applies to new development only. Either a mix of higher and lower densities or a "blanket" of small-to single family development (RS-5000) would satisfy the policy.

A density of 7-8 units per acre has been shown by both local and national studies to be an important "threshold" density for achieving savings in public facility and service costs, (especially transit) transportation energy use, and savings in housing costs to the consumer.

12e. What density would be achieved in our planning areas if they were fully developed under current zoning? What would be the net yield if the 7-8 unit/acre policy were applied? (Seattle Master Builders 1984)

Response: The trend density (which is much lower than what the actual zoning would allow) of development under "no action" would be about 3.16 units per acre in the urban areas (i.e., excluding areas currently zoned A, FR, G, G-5, GR). The results of applying the proposed urban density policy would vary widely between community planning areas within the designated urban areas, since some community planning areas are almost "built out" like Highline, and therefore might not even have the new policy applied, where as others have substantial amounts of vacant land.

In a hypothetical area half developed at the trend density of 3.16 units per acre, full application of the density policy to the remaining half would yield a total average developed density of about 5.6 units per acre. Application of the higher density policy to half of the remaining vacant land (assumed in estimating capacity of the Executive Proposed Guide) would yield a developed density of 4.4 units per acre. Achievement of the higher density or only one-quarter of the remaining vacant land (assumed in estimating capacity of the proposed Comprehensive Plan--1985) would yield a developed density of 3.8 units per acre.

12f. Page 58, Figure 4: The text refers to 15,209 new residential units authorized by building permits since 1980, although the figure for table shows that there were only 13,572. Which is correct? (Weyerhaeuser 1984)

Response: Both figures are correct. The discrepancy has three sources. First, the 15,209 figure is based on building permits issued, whereas the 13,572 figure is based on reports to the Assessor of housing units completed. Some permits are never completed, or may be completed after the reporting period. Second, unincorporated King County loses housing units when areas are annexed to cities; while annexations have slackened off since the 1960s, several significant ones did occur in the last four years. Third, some (a small number) housing units are demolished each year.

13. Transportation

13a. The EIS should identify more specifically the traffic impacts of the proposed development pattern; the EIS does not discuss transportation impacts on adjacent cities. (Bellevue 1981, POW 1981, Redmond 1984)

Response: Since the proposal itself is very general, projecting its traffic impacts for specific routes now would not be possible. The proposed action would provide a framework for an update of the county's

transportation functional plan. The specific study of highway and arterial levels of service, funding, existing travel demand and projections of future use needed for that plan is now under way, and will be used to monitor growth county-wide, prepare the Annual Growth Report and provide direction to the more detailed community plans. Adoption and revision of these plans are separate actions under SEPA; since their impacts will be known in more detail, the EISs or environmental checklists done for them can be more detailed than this EIS. Also see 1a and 22c.

13b. The public transit section should discuss the potential impact on transit of implementing measures such as employer-supplied van pools, flex time and parking limits. (Metro 1981, Washington State Dept. of Transportation (WDOT) 1981)

Response: Metro TRANSITION's Plan 1990 includes provisions for van pooling and discusses such incentives as flex-time in detail. These measures are generally viewed as supportive of transit use. The plan's land use policies on mixed business/residential use development allow for reduced parking when good transit service is available. The Pushkarev and Zupan study cited in the Draft EIS found that reduced availability of parking increases transit use. All alternative versions of the proposed action (i.e., second draft and Executive Proposed Guides, and Comprehensive Plan--1985) propose parking limits and reduced parking requirements for neighborhood business areas, but not a limit on parking in major commercial centers.

13c. The public transit section should assess specifically the impact of maintaining the boundary between growth reserve and urban/suburban communities on the existing transit system. (Bellevue 1981)

Response: See response to 13a. Also see the first paragraph of Metro's transportation comments on the Draft EIS, beginning on page 3 of their letter, reproduced in Part V of this document.

13d. The EIS should indicate that the full funding of Metro's 1990 Transit Plan is not expected at this time. (WDOT 1981)

Response: Acknowledged.

13e. The EIS should note that the State Department of Transportation may not have the funds to mitigate severe traffic impacts of growth on local roads that are state highways. Therefore, we will be looking to the respective developers through the county for the necessary funds. (WDOT 1981)

Response: The plan proposes that equitable methods be established for developers to participate in paying for off-site facilities needed to serve new developments (see Policies PI-107, F-107, F-110).

13f. The following comments on the original Draft EIS were also made by Metro:

Page 43, paragraph 4: "The 1990 Comprehensive Plan for Transit (1981) is intended to provide major service improvements...through King County, rather than just to downtown, which was the single focus of the previous plan" (underline added). The underlined part of this statement is incorrect, in that non-Seattle CBD activity centers have benefitted greatly under the previous plan, along with downtown Seattle.

Response: Acknowledged.

Page 44, paragraph 2: The Draft EIS states that the Transit 1990 Plan does not assume any decrease in land consumption rates. This is not entirely correct. The population/employment forecasts developed by the PSCOG and utilized in the transit plan development were based on the "Policy" forecasts of the PSCOG and thus did assume a decrease in land consumption rates. However, to the extent that the Guide may further restrict the rate of land consumption, the statement is partially correct.

The Draft EIS quotes Metro Transit on background research done by Parsons, Brinckerhoff, Quade and Douglas and the Pushkarev and Zupan studies which relate land use densities to transit use. The implication appears to be that the Guide will in fact achieve these relationships within suburban areas which are large enough to permit the cost-effective provision of increased transit service. The majority of existing residential zoning codes would not appear to help achieve these densities and the Guide does not cite sufficient "areawide-specific" examples. However, any improvement in population/employment densities should in time be beneficial to transit (see p. 133).

Response: The plan, if fully implemented, would result in more use of the higher density residential zones (primarily smaller-lot single-family and low-density multi-family) and potentially less area devoted to parking in some commercial areas. These changes would affect mostly new development, and the Draft EIS acknowledges that reduction of transportation energy use in the short run depends more on vehicle fuel efficiency than travel reduction through more efficient land use patterns (p. 181, paragraph 4). Also see 9a and 9b.

Page 156, paragraph 4; Page 181, paragraph 2: The Draft EIS states that 11% of transit trips taken by county residents are from residence to non-employment destinations. A more accurate statement would be: "About 45% of all trips made by county residents on Metro Transit are between their residences and non-employment destinations."

Response: The 11 percent figure should have been labeled as referring to peak-hour transit use, and is based on standard transit use modeling. Metro's 1977 Rider Origin-Destination survey showed home-work trips system-wide as about 52 percent of all transit trips, with another 11.6 percent for home-college. Whether college is counted as a "work" destination or not, total home to non-employment trips by Metro riders would be higher than the Draft EIS indicated, according to this survey.

Page 159: The following corrections should be made to the paragraph under "Public Transit." Metro's average weekday ridership in 1980 was about 230 thousand, not 260 thousand as stated in the text. Suburban ridership in 1980 equalled 23.3% of total system ridership (not 22.3%). At this time (1982) Metro operates 64 wheelchair accessible routes.

Response: Acknowledged.

Page 164, paragraph 2: There is a typographical error in sentence 3. Transit 1990 is intended to double ridership over 1979 levels by 1990, not 1980.

Response: Acknowledged.

Page 207, paragraph 2; It should be noted that differences in vehicle miles travelled (VMT) cited in the 1990 Transit Plan refer to the reduced increase in VMT if the 1990 Plan is implemented over the 1990 VMT if the current program is continued. In other words, while in any case total VMT will increase from 1980 to 1990, with implementation of the 1990 Plan that figure will be less. If the reduction in the 1990 Plan was assumed in the Draft EIS to mean that total VMT in 1990 will actually be less than in 1980, then the energy analysis in the GDG Draft EIS is incorrect.

Response: The county interprets the VMT figures the same way Metro does, and the air quality and energy analyses in the Draft EIS are based on this interpretation. Also see 4b.

Page 207; The final sentence in the paragraph states that the lower gasoline savings figure (11 million gallons), when offset by the increased diesel fuel consumption given in the 1990 Plan, will result in a net increase in energy consumption. This conclusion contradicts findings presented in Metro's "More Mobility for the Eighties" (Figure V-12) and the 1990 Plan DEIS (pp. III-54 through III-57).

Response: We agree that total fuel use would be lower. However, because diesel fuel contains more Btu's per gallon than gasoline, more diesel fuel use could mean more total energy consumed if the amount of gasoline saved were too small.

13g. We have also reviewed the Draft Environmental Impact Statement (EIS) for the Second Draft, King County General Development Guide, particularly pages 164 and 165 which

cover the impacts on aviation. These pages include the statement that Policies T-604 and T-605 "could have indirect (but potentially significant) positive or negative impacts on Sea-Tac and Boeing Field operations, depending on whether they helped or hindered site selection, in the event that air space conflicts at Sea-Tac and Boeing Field indicated the need for a new general aviation airport." Similarly, it should also be mentioned that these policies could have a positive or negative impact on the based-aircraft capacity situation in King County, depending on whether they help or hinder the site selection for a new general aviation airport. (U.S. DOT, Federal Aviation Administration 1981)

Response: Acknowledged.

13h. Page 54 speaks about road standards. Describe what specific road standards are proposed for various uses and densities served. Also describe the commercial and industrial access street standards as part of this DEIS. (Same comment made about facility standards generally) Describe the effect of lower surface standards and other implementing measures for private roads in rural areas and how King County will maintain existing roadway systems for current residents. Current residents will be anxious to maintain their current road standards and if King County is proposing to change these maintenance programs in rural areas, the citizens should be informed of this change so that it can be evaluated from a consumer's point of view. (Weyerhaeuser 1984) Existing rural roads must be maintained under any alternative. (Keesling 1984)

Response: The proposed action is adoption and initial implementation of a comprehensive land use plan, which is a general policy document. The plan is intended to give policy direction for subsequent revision of roads standards, which include engineering details. The effects of lower surfacing standards for private roads in rural areas would be to make such roads sufficient for low density residential uses (and therefore low area-wide low traffic volumes), and to warn prospective rural residents of the tradeoffs involved in rural locations (lower initial road cost vs. potentially higher private maintenance costs). The new road construction standards would not affect maintenance of existing public roads by King County, or maintenance of existing private roads by benefiting property owners.

13i. Page 77 says implementation of the GDG will reduce, "to some extent," road construction expense. As to feeder roads for newcomers, developers pay for those, not the public. As to roads in the infill areas which must be upgraded to handle the higher densities, it's more expensive to rebuild existing roads than it is to build new ones. (Same comment by Hillis et al. 1984) And according to page 82 of the EIS, higher densities result in increased demand for freeway expansions and extensions, which of course are the most expensive roads of all. So I strongly question that imple-

mentation of the GDG will reduce, to ANY extent, road construction expense. (Keesling 1984)

Response: The conclusions of the EIS are based on computer modelling of major alternative growth scenarios which take into account such factors as increased demand for freeways. The conclusions are carefully drawn so as not to overstate the benefits of the proposed action. This is shown by two assumptions. First, the model assumes no changes in level of service or in transit use. In fact, as growth continues (whether or not the proposed plan is adopted) levels of service will drop (this is already the case in the fastest growing parts of the County) no matter how many new roads are built, and more rush hour travel demand will be met by transit, which is much less expensive per passenger-mile than new freeway capacity. Second, the comparisons only cover a ten-year period, whereas a more substantial difference between alternative growth patterns will occur only over a much larger period of time.

Also see 1g above concerning the role of infill. Existing roads and other parts of the urban infrastructure will need to be maintained, replaced and upgraded to currently applicable standards whether or not infill accounts for an increased share of residential growth, since most new employment growth is forecasted to locate in cities regardless of where new residential growth locates.

14. Fiscal Conditions and Public Services

Public Infrastructure Investment

14a. The Draft EIS: 1) assumes that most infrastructure investments are financed through general tax revenues, and 2) most public services are provided for by King County. Since these assumptions are not true, the fiscal analysis is faulty. (Weyerhaeuser 1981, Hillis et al. 1981, Keesling 1984).

Response: The Draft EIS distinguishes between those public services provided directly by King County and those public services provided by other levels of government (see p. 166, 2nd paragraph of the Draft EIS). The Supplemental Draft EIS recapitulates and updates this analysis (pp 66-94).

King County is charged with the responsibility for comprehensive land use planning for the unincorporated portions of King County and such planning requires consideration of the relationship between land use policies and all public service delivery costs. The policies of the proposed Comprehensive Plan are intended to encourage land use patterns that result in the cost-effective provision of public services and infrastructure, regardless of which local agency actually provides such services and infrastructure, or how they are funded (e.g., taxes vs. user fees).

The fiscal impact analysis clearly indicated that land use policies that encouraged higher-density development and the use of the existing

public infrastructure were more cost-effective than development at historic lower densities. This was the case regardless of which public agencies (or the private sector) provided the facility or service, or how they were financed.

Adequacy of Fiscal Impact Assessment

14b. The Draft EIS contains a very abbreviated and generalized picture of the potential impacts on King County's budget, and on that of the cities and special districts. (Burlington Northern 1984, City of Bellevue 1984) The Supplemental EIS shows a tremendous need to upgrade facilities. How will this be done? (Weyerhaeuser 1984) The fiscal impact assessment is largely based on prior studies that were subject to much criticism and that many readers may be unfamiliar with. (Land Use Research Council 1981, Hillis, et.al. 1981.)

Response: The purpose of the EIS's fiscal impact assessment is to give a general idea of the magnitude and direction of impacts, not to quantify with precision the changes in public revenue and expenditure that would result from the implementation of the proposed plan. A precise assessment is impossible prior to the adoption and implementation of the Comprehensive Plan through community plans and individual projects. The applicable SEPA Guidelines acknowledge that less detailed information is usually available for evaluating nonproject actions such as this one (WAC 197-11-442). See pp. 95-108 of the Supplemental Draft EIS for a discussion of ways to mitigate the costs of growth. Also see 1a, 13a and 22c.

The fiscal impact analysis performed demonstrated that major long-term cost savings are associated with encouraging higher density development and the use and enhancement of the existing public service infrastructure, in comparison with continuing the status quo. Therefore, no matter what the exact fiscal impact of the proposed action turns out to be, it is likely that this impact will be beneficial compared with "no action." The general explanation of this impact is the intent of the EIS's fiscal impact assessment.

It is true that many of the conclusions in the Draft EIS may not be fully understood without referring to the background studies made as part of the preparation of the proposed Guide. The sheer volume of these studies made their inclusion in the Draft EIS impractical, especially since they are available to the public separately. The EIS does incorporate these studies by reference (WAC 197-11-402(7)).

Accuracy/Discrepancies

14c. Figure 16 on page 72, which compares the cost of alternative development patterns, shows only \$189,000 more in park costs for the GDG ("Subcounty) growth pattern, then for park costs if we continue our present, unchanged ("Baseline") growth pattern. The \$11,530,000 cost projected for the GDG Subcounty alternative doesn't include anything for

the Cougar Mountain Regional Wildland Park which the County has already started to purchase. In fact, it barely covers the \$10,000,000 estimated fixup costs for current County park, let alone provide for acquisition of the new public greenbelts and recreation areas that will be necessary to entertain the population under the high-density concepts of the GDG. It is further noted that Figure 17a and 17b do not include park costs at all! (Keesling 1984)

Response: The Dornbusch Study, on which most of the analysis of alternative growth patterns is based, only considered neighborhood and community parks, because new demand caused by growth can be more clearly attributed locally than regionally. See pages 84 to 86 of the Supplemental Draft EIS. Since the amount of growth for each alternative was held constant, and since demand was linked to population, only slight variations between alternatives in growth-induced park needs were apparent. Figure 16 also only addresses certain capital costs, not maintenance. Figure 17a and 17b are from a different, more general study, not one on King County. This study looked only at capital and operating costs of specified services as they vary by residential density, whereas Dornbusch looked at growth at different densities in different locations in King County.

14d. The EIS Figure 16 states that public capital improvement costs are LESS under the "as is" Baseline alternative, and less than 1% more under Baseline for BOTH public and private costs, than costs under the proposed GDG Subcounty alternative. (And that's with the GDG Subcounty figures including practically NO additional park expenditures, despite oft-reiterated statements on the importance of new parks and open space under the infill proposals of the GDG.) However, the KING COUNTY GROWTH MANAGEMENT BACKGROUND STUDY paper given out by staff at the recent community GDG meetings, states that "Capital improvement costs for new development in the continuing trends pattern would be 27% higher than costs for the managed growth pattern." Either the EIS or the Background Study is wrong. Which is it?" (Keesling 1984) The analysis understates the differences between alternatives, detracting from the validity of the EIS. (King County Fire Protection District No. 82 1984)

Response: See pages 71 to 74 of the Supplemental Draft EIS for qualifying assumptions and interpretations of the Dornbush Study. The other document cited, with its conclusions of the 27 percent saving, refers to an older study on costs of growth which used on costs of growth which used an entirely different methodology. The EIS relies on the Dornbusch Study, which is more conservative in that it understates differences between alternatives for the reasons listed in the Supplemental EIS. Also see 13i above.

15. Energy

15a. The Draft EIS seems to conclude that the Guide's proposed "energy efficiency" criterion for phasing expansion

of urban growth into growth reserve areas is too narrow, overemphasizing location/ transportation at the expense of density, mixed use, building type and site orientation. (Land Use Research Council 1981)

Response: The Comprehensive Plan--1985 does not use energy as a phasing criteria. Energy conservation is part of its rationale for the proposed plan concept. The existing total county energy consumption pattern (40 percent transportation) as well as the analysis of alternative growth patterns cited previously (see 1g) indicate that location and density together are the major factors in total community energy use. High density in a currently outlying area (New Town) results in a .25 percent saving in incremental energy needed for 1980-1990 growth compared with continuing trends (Baseline), whereas high density in or near existing centers (Transportation Corridors) results in a 5.7 percent saving. Therefore, the emphasis on location/transportation as a consideration in locating new growth is consistent with the EIS's conclusions. The proposed plan also contains site development policies encouraging energy efficiency (e.g. solar orientation) regardless of location.

15b. Regarding transportation and energy, the Draft EIS seems to assume that most new jobs will locate in or near Seattle. In fact, there has been substantial employment growth in the county. Where are most new (1980-2000) jobs expected to locate? By strongly channelling new residential growth into the urban/suburban area, will the Guide in fact increase or decrease home/work commuting and therefore transportation energy use? (Weyerhaeuser 1981)

Response: The employment forecast (second draft General Development Guide, Figures 1-8 and 1-9) used in the evaluation of alternative growth scenarios indicates that a substantial amount of the employment growth between now and 2000 will locate in unincorporated King County and in cities outside Seattle. According to this forecast, Seattle's share of total employment would drop from 62 percent to 56 percent, and about 31 percent of new jobs would locate in unincorporated King County. Therefore, the Draft EIS's conclusion that the proposed action could reduce transportation energy use by providing the opportunity for locally balanced population and employment growth is based on assumptions about the location of employment growth similar to those put forth by Weyerhaeuser.

16. Utilities

16a. The entire Utility Section [of the Guide] needs to be rewritten to exclude language implying superimposing county authority over state law and regulations. (Jonson and Jonson, representing Washington State Assn. of Water Districts 1981)

Response: The Comprehensive Plan--1985 was rewritten to clarify King County's relationships with independent service districts. The county will comply with all applicable state laws.

16b. *The Draft EIS fails to discuss how the utility infrastructure developed in growth reserve areas (Transitional Growth Areas in the Council's proposal Comprehensive Plan--1985) relates to that needed when the growth reserve is changed to urban/suburban. Also, are growth reserve areas to be taken into account in utility planning for current urban/suburban areas? What time horizon should be used in utility planning? (Bellevue 1981)*

Response: The capacity of existing utility infrastructure (and of other public facilities) in the Transitional Growth Areas varies widely depending on location. For example, some areas within the proposed designation have relatively advanced public water distribution systems, while others do not and are not within any utility district. Under the Comprehensive Plan--1985, community plans will determine which portions of Transitional Growth Areas will be expected to urbanize, and which will be redesignated rural. Public service agencies should include both current and future urban areas in their facility planning; if there are Transitional Growth Areas where community plans do not indicate the long-term uses, service providers will not be able to do so.

16c. *Is regional demand for water, especially in Seattle's service area (about 80 percent of the county) going to be a major issue? (Bellevue 1981)*

Response: The County is working with PSCOG and the City of Seattle to assure use of consistent growth forecasts in land use planning and in functional plans for such facilities as water supply, transmission and distribution. In February, 1982, the King County Council approved Seattle's Water Comprehensive Plan, which contains options for major new source development, major improvements to existing supply facilities, system improvements to reduce pipeline losses. If the Plan is followed, it will be possible to balance water supply and demand. However, there are many legal, engineering resource and other aspects of specific projects that, if not resolved, could make supply a big issue. Since the Comprehensive Plan does not propose limiting growth, its effect on potential shortfalls is assumed to be the same as "no action". See page 191 of the Draft EIS for more discussion of this issue.

16d. *The EIS does not recognize the anticipated water supply shortage in South King County, nor does it mention Tacoma's proposed Pipeline No. 5, which will, if constructed, help alleviate this problem. (City of Tacoma, Department of Public Utilities, Water Division 1981)*

Response: The proposed action and the EIS do not address specific capital projects; rather, the plan would establish the general relationships between county-wide land use policy, community plans, functional plans and capital improvement programs (see pp. 35-36 and 39, 49-50).

A small portion of Federal Way, the City of Enumclaw and other on-line customers in South King County procure their water from the City of Tacoma. Pipeline 5, if constructed, is proposed to be routed through

south King County, giving Tacoma the ability to serve this area. The City of Tacoma's supply area is currently defined through an agreement with Seattle as all areas in King County south of S. 272nd St. The King County Utilities Technical Review Committee has noted differences of opinion among Tacoma's prospective wholesale customers regarding the timing and degree of need for water from Pipeline 5. The Pipeline 5 project, as of the date of this final EIS, is the subject of litigation involving the City of Tacoma, the Washington State Departments of Ecology, Fisheries and Game, and the Northwest Steelheaders.

16e. The EIS fails to address the impacts (especially fiscal) of infill on existing sewer and water districts, especially in the communities of Shoreline, Highline, Federal Way, Northshore and Soos Creek. No evidence is presented to back up the assumption that existing facilities are "under-utilized." (POW 1981)

Response: The Draft EIS section on alternatives compared major public and private utility costs for different growth scenarios (pp 200-205). The table on page 204 of the Draft EIS summarizes cost differences, based on fiscal analysis by David Dornbusch & Co. of San Francisco and Kahn/Mortimer/Associates of Seattle. The detailed report (on file for public review in the Planning Division) by these consultants breaks sewer and water costs down by centralized facilities (e.g. treatment plants, major pipelines) and local collection/distribution systems for each community planning area. The dollar figures in these studies were adjusted to reflect 1983 construction costs for the Supplementing Draft EIS. The study indicates that the Transportation Corridors scenario (an extremely aggressive infill strategy compared with the proposed action) would cost about \$14 million more than Baseline (or "no action") for sewage treatment, about the same for major water facilities, and over \$76 million less for local sewage collection and water distribution systems. This represents a net saving of about \$62 million. See pp. 9-43 of the consultant report for a detailed breakdown by type of cost, community planning area, and methodology. Also see 1h.

According to Dornbusch (using Metro's data), 65 percent of the sewage treatment facilities for which flow data are available were being used at half or less of their full capacity in 1980.

16f. We wish to note the following correction to the first sentence of the third paragraph on page 190. It should read: "The Metro facility at Renton is scheduled for an increase in capacity from 36.0 mgd to 72.0 mgd by 1986..." (Metro 1981)

Response: Acknowledged.

16g. In general the Draft Supplemental EIS satisfactorily covers potential impacts to wastewater treatment facilities and impacts resulting from on-site facilities. We have only the following comments:

Page 100, *Mitigation of Fiscal Impacts of Growth*, 2 c. should read as follows (changes underlined):

A Metro advisory committee has developed a recommendation that Metro establish a connection charge "in an amount estimated to recover approximately 50 percent of the estimated cost of the 20-year capital improvement program" (Rate Structure Advisory Committee, 1983). The recommended charge would amount to approximately \$490 per "customer equivalent" and would increase with inflation plus 4 percent each year. This committee's recommendation has not, as of this time, been presented to or been considered by the Metro Council. (Metro currently has no connection charge.) (Metro 1984)

Response: Acknowledged.

17. Human Health

17a. Recent studies and information regarding methane gas generation and migration at existing/closed landfills have indicated this to be a significant problem and need for caution. Site testing around the country has uncovered numerous instances where methane gas had migrated off site and accumulated at explosive concentrations in adjacent residential, commercial, and industrial buildings. In addition, the production of leachate that is inherent with landfills can also pose a potential problem with adjacent land development. (Seattle-King County Department of Public Health 1981)

Response: Acknowledged. The Department's letter also recommends that King County recognize the problem and set limits on development near old and current landfills.

18. Parks and Outdoor Recreation

18a. The need for additional open space is not clearly spelled out. King County has a wealth of open space lands already which are unlikely ever to develop. (Burlington Northern 1981, Keesling 1984)

Response: Preservation of existing open space and acquisition/development of new open space and park areas for public enjoyment are established county policies (e.g., Motion 4152, 1979; Ordinance 3183, 1978; Ordinance 1096, 1972; Comprehensive Plan, 1964) and citizen support for them continues. In the 1979 public meetings conducted by the Growth Management program, open space/environmental quality was the second most frequently-mentioned attribute of a desirable community (Analysis of Results of 1979 Public Workshops, p. 35) and the second highest priority for public spending (*ibid.*, pp. 36-37). Questionnaires distributed during presentation of the second draft Guide in 1981 indicate general agreement with the Guide's proposed open space policies and a preference for close-in open spaces within communities. The opinion survey on the Guide done by Communication Design in 1982

showed 88 percent of respondents in favor of open space in urban areas. These results indicate that protection of existing open space and good park sites in areas designated for urban growth and acquisition of park sites in already-developed areas are high priorities with King County residents. See pp. 195-196 of the Draft EIS for a discussion of adopted park service standards and an estimate by community plan area of park acreage deficiencies.

18b. The Draft EIS is not specific on how open space (especially major areas) would be created or preserved. Alternatives to those mentioned should be explored; such as transfer of development rights. In addition, funding of maintenance and operation is as important as acquisition. (Land Use Research Council 1981, Burlington Northern 1981, Bellevue 1981, Keesling 1984, Weyerhaeuser 1984)

A detailed parks and open space functional plan is budgeted and scheduled to begin in 1985, after Council review of a work program. This functional plan will evaluate acquisition methods in detail, including transfer of development rights.

The comment on operation and maintenance is acknowledged. This is a revenue (as opposed to land use) problem, and must be addressed through general fiscal measures rather than land use or location-specific regulations. Also see 1a and 3b.

18c. It is impossible to tell from the Draft EIS what the open space impacts of the Guide would really be. (Land Use Research Council 1981)

Response: The Comprehensive Plan would provide a general framework (including the plan map) for developing the open space plan and for considering park and open space needs in community planning and during the review of capital budgets and individual development proposals. Also see 1a and 10a.

19. Archaeological/Historical Resources (No comments received)
20. Relationship Between Local Short-Term uses of Man's Environment and Enhancement of Long-Term Productivity. (No comments received)
21. Irreversible or Irretrievable Commitments of Resources (No comments received)
22. Alternatives to the Proposal and Their Relative Environmental Impacts

22a. The Draft EIS does not discuss enough alternatives to the proposal. "No action" is not the only feasible alternative. (POW 1981, Hillis et al. 1981, Weyerhaeuser 1981, Burlington Northern 1981, Seattle Master Builders 1984)

Response: The Draft EIS discussed alternatives to the proposal at three levels. First, a series of "pure" alternative growth scenarios compared the relative magnitude and direction of impacts of different location/density policy approaches to accommodating a forecast amount of population and employment growth. This analysis was updated for the Supplemental Draft EIS issued in 1984. Second, "no action" (which was also the basis of comparison for discussing the proposal's impacts throughout the rest of the EIS) and some major modifications to the Guide were discussed as the most likely alternatives. Third, alternative ways to implement the plan were generally discussed. Given the general and nonproject nature of the proposed action, this discussion of alternatives is consistent with the guidance given in WAC 197-11-442(4) of the SEPA Guidelines.

22b. The most important alternative, that of a modified General Development Guide, should be discussed in more detail. The most important modifications to be explored are eliminating the growth reserve, east-west instead of north-south boundaries between rural and urban areas, and eliminating or modifying reliance on LDIS for boundary changes. (Hillis et al. 1981) What is the impact of eliminating the Growth Reserve? (Burlington Northern 1984)

Response: The Draft EIS acknowledged that many modifications would be made to the second draft Guide before it would be adopted. The EIS process is only one part of a broader, ongoing public involvement process associated with the proposed action. The second draft of the Guide was issued in May, 1981; the Draft EIS was issued in August, 1981. Many agencies and individuals who received or had access to the Draft EIS chose to direct their comments to the proposal itself rather than to the EIS. These comments are open for public inspection at the Planning Division office. As one part of this process, the Draft and Supplemental Draft EISs were designed to give the public and elected officials a concise overview of significantly different location and density policy alternatives for accommodating forecast growth, and an idea of their relative effectiveness in achieving adopted goals such as controlling public service costs, conserving resource lands and providing a choice of urban and rural lifestyles (Growth Management Program Guidelines 4, 7 and 8 of Motion 4152). Modification of the proposal continued through preparation of the Executive Proposed General Development Guide in 1984, and the proposed King County Comprehensive Plan--1985.

The following paragraphs respond to the three specific modifications suggested by Hillis et al. and Burlington Northern.

The Executive Proposed General Development Guide did propose eliminating the growth reserve designation. A Transitional Growth Area designation was added in the Comprehensive Plan--1985, which is similar in some ways to the growth reserve. The main impacts of the Executive Proposed Guide's approach on the areas earlier shown as growth reserve would have been to make development at urban densities subject to case-by-case review based on adequacy of facilities and services, as opposed to community plan revisions; and to clearly indicate the areas'

long-term urban potential to residents, developers and service providers. See Section II for a description of the Transitional Growth Area policies.

Establishing east-west boundaries between urban/suburban communities and the rural area is not a realistic alternative, except for the possibility of establishing a corridor of urban/suburban growth along all or part of the I-90 corridor, which is mentioned in the Draft EIS. The reason this alternative is not a realistic one is King County's topography (p. 27). King County and the Puget Sound region have been formed by glaciers, which carved out such major north-south landforms as the main river valleys, Lakes Washington and Sammamish, Puget Sound, and many other north-south ridges and valleys in western Washington. This topography exerted a strong influence on the historic pattern of development in the area, mainly by dictating major transportation corridors. These climatic, geologic and other natural forces also dictated the location of major agricultural areas, productive timber lands, flood plains, steep slopes and other features that also influenced or determined land use patterns. The result of these factors is a general pattern of north-south bands of development: densest urban areas closest to Puget Sound, a fringe with uses ranging from suburban to rural, and a rural area extending into the Cascades. These natural forces will continue to exert influence on land use choices; therefore, land use policies and regulations that recognize these forces will be the most effective, most practical, and least onerous on both the public and private sectors.

The proposed rural boundary follows major natural features wherever possible (e.g., the western edge of the Snoqualmie river basin), and buffers most of the County's remaining natural resource lands (i.e., farming and timber, municipal watersheds) from urbanization. The proposed boundary also includes some sparsely developed areas that would be difficult to provide with urban services and could provide a rural residential lifestyle choice. Disregarding these factors would most likely result in a unstable rural boundary incapable of providing long-term protection for resource lands and rural residential areas, and would mean long-term uncertainty for agencies responsible for planning public capital improvements and services. Also see 1g.

The Comprehensive Plan--1985 as proposed by the Council relies on near-term feasibility of providing urban services, rather than monitoring of development activity and land supply through LDIS, to make boundary changes between Urban and Transitional Areas.

22c. The EIS should discuss the alternative of allowing large parcel ("new town") developments in rural areas at relatively high densities. (Hillis et al. 1984, Burlington Northern 1984) Why restrict rural towns from growing into new urban centers? (Weyerhaeuser 1984)

Response: Both Executive Proposed Guide and the Council's proposed Comprehensive Plan--1985 provide for large parcel developments in urban areas, and for economic diversity and growth in rural towns. The suggested large parcel alternatives are essentially methods of

converting rural areas to urban uses, which is similar to "no action." Also see 22b. A "New Town" alternative growth scenario was specifically discussed in the Draft EIS, and was found to be more expensive than other alternatives.

22d. Neither the preferred alternative nor those laid out in the Alternatives section of the Draft EIS are discussed in enough detail. (Burlington Northern 1981, Greater Kingsgate Council 1981, Hillis et al. 1981, Land Use Research Council 1981, Weyerhaeuser 1981)

Response: The Comprehensive Plan is the most general level of the county's land use planning system. From the countywide plan, this system progresses through increasingly detailed phases--community plans, area zoning, public facility and service plans, individual rezone, subdivision and other discretionary project approvals, public improvements, and private construction permits. As stated on page 65 of the Draft EIS, the Comprehensive Plan is a general policy document and the focus of discussion is on the general character of likely impacts. More detailed evaluation of impacts will take place within the planning process at more specific phases. The level of detail in the EIS is consistent with the requirements of WAC-197-11-442 and recent case law (Cathcart-Maltby-Clearview Community Council et al. vs. Snohomish County, 96 Wn. 2d 201 (1981)). Also see 1a and 22a.

22e. Another alternative that should be explored in more detail is retention and/or modification of the county's 1964 Comprehensive Plan. (Don MacDonald 1981, Weyerhaeuser 1981, Seattle Master Builders 1984).

Response: Retention of the 1964 Plan and its adopted amendments in their current form is the "no action" alternative. Both the Executive Proposed Guide and the Comprehensive Plan--1985 the proposed retain many existing policies of the 1964 Plan and its amendments, so in effect the proposed action is the alternative described by MacDonald, Weyerhaeuser and the Master Builders. Appendix A and Appendix B of the Draft EIS provided a detailed summary comparison and policy correspondence table between the second draft Guide and the existing Plan. These appendices were referred to on page 29 of the Draft EIS, and should have been referred to again on page 200 or 208 as part of the discussion of "No Action." The second draft Guide itself was annotated so that readers could see which policies are existing, new or modified. A similarly annotated version of the Executive Proposed Guide has been available for public inspection during its review process.

23. Unavoidable Adverse Impacts

23a. The Draft EIS is incorrect in stating that the Guide would have no unavoidable adverse impacts; once they have occurred, adverse impacts can't be undone. Also, many adverse impacts can only be partly mitigated. (Hillis et al. 1981, Greater Kingsgate Council 1981)

Response: What the Draft EIS meant, more precisely, is that adverse impacts of a policy action like a new comprehensive plan do not have to be lived with indefinitely. Unlike a project, the adopted comprehensive plan would be continuously subject to modification, either to deal with changed circumstances or to correct unwanted effects. The Council's proposed Comprehensive Plan--1985 specifically provides for an overall review of its policies and implementation every five years.

23b. An unavoidable adverse impact of the Guide is increased land and housing costs, through artificial constraints on supply. (Hillis et al. 1981, 1984, Seattle Master Builders 1984)

Response: See 9b, 9c, 12a and 12c.

21c. Another unavoidable adverse impact will be increased sprawl and land consumption in growth reserve and rural areas, due to mandatory larger lot sizes. (Hillis et al. 1981, Weyerhaeuser 1981, Burlington Northern 1981)

Response: See 9d.

23d. When the Guide is adopted, there will inevitably be a rapid scramble to develop in growth reserve and rural areas before the landowner gets downzoned. (Burlington Northern 1981)

Response: Acknowledged. The Planning Division is closely monitoring rezone, plat, and short plat activity in proposed rural areas and resource lands. This is potentially a consequence of adopting the Comprehensive Plan, especially if there is a rapid increase in short subdivisions. It is also a potential impact of adopting any change in land use policy or regulation. However, it is not unavoidable. Under Washington State Law the county has the option of using interim zoning, as authorized by RCW 36.70.790, to prevent inconsistent densities and uses until the plan is adopted and fully implemented.

23e. The Draft EIS does not discuss another unavoidable adverse impact of the Guide, namely the economic loss in land value to the land owner through confiscatory downzoning in the reserve, rural and resource land area. (Burlington Northern 1981, POW 1981, Keesling 1984, Weyerhaeuser 1984)

Response: The Draft EIS specifically noted that if the Guide were implemented, growth reserve and rural land prices would be reduced on the basis of reduced allowable residential density (pp. 152, 153).

Three points on downzoning should be considered. First, matching zoned "highest and best use" of a given parcel of land to the preferred use or uses as defined by a plan once it is adopted is not an adverse impact from the standpoint of general public welfare. Nor is it confiscatory as long as there is reasonable use of a property.

Second, in the case of commercial forest land (which would be down-zoned if the plan were implemented), the public has subsidized owners of such lands through significant property tax relief under the timber tax program of RCW 84.33. The purpose of RCW 84.33 is to allow long-term forest land management to be economical (see 9e), by lowering holding costs so that the owners of such lands can afford to look beyond a single business cycle.

The magnitude of the subsidy is indicated by the difference in assessed valuation between commercial forest land enrolled in the timber tax program and unenrolled raw land. In King County enrolled forest land was valued at a maximum of \$118 per acre in 1981 (some timberlands enrolled under a previous law, RCW 84.28, were assessed at \$16 per acre), while unenrolled, unplatted acreage with the same zoned density in eastern King County was assessed at \$3,000 to \$4,000 per acre and up. The timber harvest tax, which is collected when a crop matures and is harvested (perhaps every 30 to 60 years) does not recapture all of the property tax lost due to the difference in assessed valuation between enrolled and unenrolled land. "Confiscatory" is not an appropriate adjective for regulations that match permitted land uses with property tax valuation practices established to foster those land uses.

Third, a specific per-acre value of land based on its current zoning is not a compensable "right". Such a value is more akin to the current price of a share of corporate stock or any investment asset. Zoning and other land use regulations are valid exercises of governmental police power, and as such must consider the health, safety and general welfare of the public at large in addition to the interests of the owners of regulated property.

IV. COMMENTS BY PRIVATE ORGANIZATIONS AND INDIVIDUALS

A. Comments on the Original Draft EIS

The following comments on the Draft EIS were received from private organizations and individuals. They are arranged alphabetically and reproduced as received. All comments labeled by the sender as applying to the EIS are included, but uncritical comments and those judged to be on the proposed action itself are not responded to in this document. This also applies to the comments on the Supplemental Draft EIS, and to agency comments and public testimony in Sections V and IV.



BURLINGTON NORTHERN

BN TIMBERLANDS INC.

RECEIVED
KING COUNTY COUNCILMAN
DISTRICT No. 6

650 Central Building
Seattle, WA 98104
(206) 625-6503

OCT 02 1981

AM PM
7,8,9,10,11,12,1,2,3,4,5,6

Mr. Bruce Laing ✓
Mr. Gary Grant
Mr. Bill Reams
King County Council
King County Courthouse
Seattle, WA 98104

October 1, 1981

Gentlemen:

Attached is a copy of BN Timberlands Inc.'s response to the Draft Environmental Impact Statement for the King County General Development Guide. We hope this letter will help you better understand why we do not want our lands to be downzoned and why we feel it will not meet County goals.

Feel free to contact us any time at your convenience.

Sincerely,

Judy A. Barker
District Supervisor
Land Planning

JAB/mlc

Attachment



BURLINGTON NORTHERN
BN TIMBERLANDS INC.

RECEIVED
KING COUNTY COUNCILMAN
DISTRICT No 6

650 Central Building
Seattle, WA 98104
(206) 625-6503

OCT 02 1981

Mr. Ron Dunlap
King County Executive
King County Courthouse
Seattle, WA 98104

AM
7 8 9 10 11 12 1 2 3 4 5 6 PM

September 30, 1981

Dear Mr. Dunlop:

BN Timberlands Inc., which manages approximately 87,000 acres of land in King County, has reviewed the Draft Environmental Impact Statement (DEIS) for the King County General Development Guide (GDG) and offers the following comments. As a major landowner within the proposed Growth Reserve and Rural land use designations, we are seriously concerned about the negative impact the Guide will have on our ability to manage and utilize our land efficiently.

BN Timberlands Inc. has recently initiated steps to develop a comprehensive analysis for its lands in King County for the next 10-20 years. Large portions of Burlington Northern land in the proposed Growth Reserve and Rural areas adjoin land already converted to residential use. Consequently, resource management should only be considered an interim use at best. It is essential for our Company to carefully assess King County's growth patterns and then work with the County to resolve existing and future land use conflicts.

We have looked to the GDG and its DEIS for possible solutions in resolving conflicts between natural resource management and residential use. We are disappointed that these documents do not provide such a solution but instead create an even greater potential for land use conflicts.

The DEIS fails to identify clearly the potential impacts on the landowner within these land use designations, nor does it provide measures to mitigate these impacts. Presently there are numerous areas in King County adjacent to growth areas, where forest management is no longer viable. The Guide's proposal to designate a Growth Reserve Area and a Rural Area will severely hamper the operations of a company like BN Timberlands Inc., which is dependent on its resources and land base. Where forestry is no longer viable, and conversion to residential use is prohibited by the GDG, our Company and, in the long term, the consumer, will suffer. In addition, the DEIS does not adequately address the implication of forest management next to residential areas, either. These documents demonstrate a very superficial understanding of these adverse inter-relationships. Therefore, we ask that considerably more evaluation be undertaken before these onerous regulations are imposed upon us. The DEIS needs to discuss the impending social and economic impacts of these land use designations and provide alternatives to minimize these impacts.

The DEIS also does not provide workable alternatives which would fulfill the Guide's objectives of accommodating growth efficiently while promoting productive use of natural resources. The Guide has taken a regulatory

rather than an incentives approach in seeking to accomplish these goals. One alternative which should have been discussed is to allow the market to allocate land to meet society's needs. Development of performance standards would be the mechanism used to protect public values. This system is in place in parts of the country already and is a realistic alternative to evaluate and discuss.

It is our view that land use conflicts have been caused, to a certain extent, by excessive governmental intervention. For example, provisions for higher density in existing communities, such as lenient building and development regulations, have not been applied by either King County or metropolitan jurisdictions to reduce sprawl into undeveloped King County. Although the DEIS mentions the use of such incentives, there is no discussion of whether it is realistic to expect that existing communities will acquiesce to increased densities. Political realities cannot be overlooked in an EIS.

Affordable housing has also been adversely affected by King County because of its regulatory approach toward land development. For example, the price of housing is affected by several elements:

1. Price of construction.
2. Price of land, including services (lot size is a major factor).
3. Carrying cost of money (King County's building requirements cause delays and therefore drive up the cost).
4. Supply-demand relationships and scarcity effect on land/house prices. King County regulations have created scarcity because:
 - a. Developments have been overly restricted.
 - b. Land has been gobbled up by large lot development, either favored by the County or created by property owners frustrated at their inability to develop efficiently somewhere else.
 - c. Moratoriums.

Local governments must make difficult, but firm decisions to provide higher densities in developed or developing areas. King County must eliminate excessive development requirements which in turn increase land prices and cause sprawl. These are positive approaches the County can take to protect resource lands and provide affordable housing. The DEIS should address such approaches to accomplish these essential tasks.

We believe the DEIS has not provided a detailed analysis of a variety of alternatives and has only discussed one alternative in detail i.e., large lot zoning. We believe this alternative will not achieve the

County's objectives to accommodate increased population and employment or achieve:

- Variety in employment and housing opportunities
- Energy efficiency in land use patterns
- Productive use of abundant natural resources
(see page 2 of the GDG)

Instead of discussing in depth an alternative favored by virtually no one, the County should concentrate on other effective means of achieving its goals. As noted, special attention should be paid to performance standards and other more positive incentives to development, instead of concentrating on negative regulatory devices.

The majority of Burlington Northern lands are presently zoned Forest-Recreation, allowing forest land to be used for the sustained production of forest products and for compatible uses such as recreation.

One dwelling unit per acre is also presently allowed in this zone. The Guide proposes to downzone all of Burlington Northern's commercial timberlands, allowing only one dwelling unit per 20 acres. (See DEIS, page 42.) This is a massive downzone of all of our timberlands. Such an alternative is objectionable to a resource landowner because it:

- 1) does not protect resource lands;
- 2) does not provide reasonable options to convert lands to other uses when population pressures make forest management infeasible; and
- 3) results in a massive reduction in value without any corresponding public benefit.

Burlington Northern has encountered significant opposition from large lot landowners and other public individuals and groups who complain about intensive forest management, such as clearcutting, slash burning, and spraying next to or near their residences. It has been our experience that these complaints do not necessarily come from landowners owning a particular sized parcel. Our experience demonstrates that spreading people out in the County, through large lot ownership, results in more encounters with property owners and, consequently, in more land use conflicts. Land consumption per person increases, and orderly development is precluded. Also, large lot zoning results in substantial community disruption when public utilities, roads, schools, and other services need upgrading. The final outcome of large lot zoning is poorer land utilization and higher costs. These impacts in F-R zoned areas are not addressed in the DEIS. If King County wants copies of specific complaints over forest management operations in the proposed Rural and Growth Reserve area, we will be happy to provide them.

Page 127

Existing Land Use Patterns. The recommended land use patterns are not based on geographic specifics. Guidelines without a physical or scientific data base are commonly misleading and subject to bureaucratic manipulation and partiality.

Third paragraph, second sentence -- add Tahoma Raven Heights Area.

Pages 129
& 130

It is unrealistic for the County to make an analysis of supply on unconstrained vacant land as presently zoned and base that analysis on the assumption that zoning will not change in the near future when the County has proposed zoning changes to implement the Guide (see DEIS, page 42).

Page 132

The DEIS should define the term "other elements" for open space enhancement. Criteria for open space should be based on need or physical constraints. The term "suitable" should also be defined. We believe suitable means the appropriateness of applying certain land use designations to a particular area of land as determined by an analysis of the economic and environmental consequences and the alternative uses foregone. In other words, the open space designation must include a reasonable expectation to use the land.

Page 134

How will the Guide prevent adverse effects on nearby jurisdictions when growth in the urban/suburban areas continue?

Page 136

The perception that the Growth Reserve Area will reduce land consumption is not based on a sound assumption. How does the County support such an assumption, and what information is this based on? Historically, more regulations have only caused per capita land consumption to increase. This has been due largely to short platting that dodges the problems of convention of plat approval. The Growth Reserve designation should be evaluated based upon its ability or inability to achieve orderly development. Although the GDG proposes higher density in the developed areas, it does not describe how this policy will work.

Page 137

It should be stated that forestry cannot be considered a long-term land use when the time frame for changing land uses is less than 10-20 years and forestry investments are recovered some 40-60 years after initial

investment decisions have to be made. We submit, that if a material investment in intensive forestry must be made today and 20 years from now the County plans to re-think the zoning, forestry outputs will be largely foregone.

Fourth Paragraph - Regarding the Planning and Implementation Chapter: The DEIS also does not state how proper phasing could occur if all of the proposed processes are considered.

Applicable Community Plans. How will the County coordinate Community Plans with The Guide? How will the County implement the Guide's goals and require Community Plans to accept growth? Too little attention has been paid to the actual mechanics of making the GDG work.

Page 138

Rural Areas. (i) Land Consumption - Five acre lots are not large enough to produce a commercial stand of trees. The statement on this page should be corrected to make this point clear.

We emphasize that people owning large lots can complain about forest activities just as easily as people owning smaller lots. It is not the parcel size that matters, it is the person's attitude. Often the large lot owner is more opposed to forest management because he expects more natural, unaltered surroundings.

The DEIS should explain why conversion is considered unacceptable. If correctly applied, land conversion can allow for better land utilization and meet demands of society. Also, the DEIS does not discuss the impact in the rural area if market diversity is not allowed. If the County limits economic activities within a rural area, the local residents would be significantly impacted if one or more of these activities goes out of business. A diversified local economy also helps benefit forestry operations by providing accessible labor and services to the operator.

The statement that the Rural designation will stop conversion of resource areas is absolutely incorrect. Large lots will still be created causing sprawl and residents adjacent to forest activities will continue to resist intensive forest management. This resistance is evident today. The DEIS should discuss the possibility of forest landowners being prevented from intensifying their forestry operations.

The DEIS also does not discuss the potential impact on the County due to inefficient land uses of large lot zoning. If intensification of land is necessary in the future, how will the County handle resistance to change large lot zoning?

Page 139

Natural Resources. In many areas of the Growth Reserve and Rural Areas, commercial forest lands are not capable of being used for profitable tree harvest due to population pressure. Capability, besides physical potential of the land, is also dependent upon political conditions of the community.

Page 140

Extractive Industries. The DEIS does not discuss the proposal to allow extractive industries to locate near growth areas. This provision would help to achieve the County's goal of providing efficient housing while supporting the use of productive resources. The County should recognize that market demands for resources such as sand and gravel, rise and fall largely with development. If extraction of these resources is allowed close to growth areas, higher transportation costs to the consumer will be minimized, and competition between producers will tend to keep prices down.

Page 141

Impacts. Again, we take issue with the statement that the rural area will protect timber lands from encroachment. Encroachment is already evident, and the adoption of a Rural Area policy will only constrain the resource landowner from reasonable alternative land uses as he finds himself put out of the resource business by residential encroachment.

Mitigating Measures. This section gives no reasonable alternatives to minimizing impacts on the landowner within the Growth Reserve and Rural land use designations. We suggest it discuss development options through master planning and large tract development. The planned unit development concept, in compliance with an overall master plan, should be liberally promoted by the County. This type of planning can and should provide adequate open space, protect environmentally sensitive areas and achieve housing needs without unreasonably restricting the landowner.

Pages 152-
153

Building Lot Costs. The concept of scarcity is not considered in this section. Speculation and price of land is likely to increase in areas where scarcity is created.

The statement that there is already a substantial supply of building lots in rural areas is a major reason why BN Timberlands Inc. believes it is not reasonable to place a restrictive Rural land use designation on us. This supply of lots is the place where people are now moving that resist our traditional forestry business.

Page 215

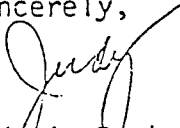
The DEIS does not discuss two important unavoidable adverse impacts associated with the proposal:

- 1) There will be a rapid scrambling to salvage whatever an owner can, before he gets down-zoned.
- 2) The impact on a private landowner, such as BN Timberlands Inc., as a result of locking that landowner into forestry in areas already largely converted. This basically is a confiscation of reasonable opportunity to use our land for its highest and best use.

In conclusion, we believe the DEIS has not adequately addressed the impacts on landowners within the proposed Growth Reserve and Rural Land Use designations. The DEIS also fails to provide a viable array of alternatives to mitigate these impacts. The GDG and the DEIS are weak in implementing the goals of providing inexpensive housing and promoting natural resource production. Flexibility, incentives and less restrictive measures are needed to assure that the Guide will work and be acceptable to the citizens of King County.

Should you need further assistance from us, we are available to meet and discuss these concerns with you.

Sincerely,


Judy A. Barker
District Supervisor
Land Planning

JAB/mlc

cc: Bruce Laing, King County Council
Gary Grant, King County Council
Bill Reams, King County Council

131
2.
LAW OFFICES OF

HILLIS, PHILLIPS, CAIRNCROSS, CLARK & MARTIN

A PROFESSIONAL SERVICE CORPORATION

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WENDY W. REED
MICHAEL F. SCHUMACHER
RICHARD S. SWANSON
BARBARA A. WILSON
RICHARD R. WILSON

September 30, 1981

Mr. Harold Robertson, Manager
King County Department of Planning
and Community Development
W-217, King County Courthouse
Seattle, Washington 98104

Re: Draft Environmental Impact Statement for
King County General Development Guide,
Second Draft

Dear Mr. Robertson:

We have reviewed the draft environmental impact statement (EIS) for the second draft of King County's proposed General Development Guide (GDG) and wish to submit the following comments on the draft EIS.

General Comments

In general, we are seriously concerned about the adequacy of the GDG EIS and believe that impacts and alternatives must be much more thoroughly described in the final EIS if the document is to be of significant help to the decision makers, and, indeed, if the document is to be considered legally adequate under prevailing standards of review. Although there is certainly greater flexibility in exploring impacts for a non-project EIS under the SEPA Guidelines, that flexibility does not discharge an agency from its duty to identify and describe impacts in sufficient detail to aid the decision maker in deciding upon a course of action, nor should that flexibility be used as an excuse for relying on conclusory statements in the document.

The EIS in general paints what we believe to be an overly optimistic and rosy picture of events if the GDG is adopted in its present draft form. We believe this unjustified optimism has been carried over from the draft GDG itself. Certainly both the summary and the text of the

Mr. Harold Robertson
September 30, 1981
Page two

draft EIS lack specific detail on the process of implementing the policies of the GDG through the community plan process and through revision of zoning code regulations, as well as on criteria for amending the GDG plan map. These are crucial features and not mere afterthoughts. Unless the procedures are spelled out in some detail, there is no way for either the decision makers or the public to know how the broad policies of the GDG will actually affect county citizens in their daily lives.

Impacts

The description of the impacts of initial implementation on page 23 of the summary (as well as on pages 143 ff.) lacks the necessary detail. For example, how are existing community plans with areas designated as Urban/Suburban to be amended in order to accommodate the full range of housing densities and types described in the Guide? Will the revision time-tables for these community plans be advanced? More importantly, is it politically feasible to expect such higher densities to be accommodated without a bitter political struggle in those communities? It would appear that the Planning Division recognizes the difficulty of doing so, for pages 133 and 135 contain statements that residential infill would not occur on such a scale that overall densities in existing communities would either change or provide a significant part of the housing capacity needed for population growth. Thus, it appears that one of the major linchpins of the GDG -- reliance on infill in order to discourage the need for opening up other areas of the County for growth -- will be of little value in accommodating growth in King County. While we agree with this assumption, we believe that the tenor of the draft GDG, and the balance of the draft EIS, ignore this observation. Regardless of the accuracy of the assumption, there is still certainly a need to describe exactly what the implementation measures necessary to encourage infill will be.

Some impacts appear to be completely ignored. How likely is it to predict, for example, that total air pollution from automobiles could be reduced, if the proposed policy of a local balance of population and jobs in each community were achieved (page 24)? Population will grow; growth brings more automobiles; and more automobiles will increase air pollution. Again, on page 215 the draft EIS baldly predicts that there will be no unavoidable adverse impacts arising from implementation of the GDG, since the document merely

Mr. Harold Robertson
September 30, 1981
Page three

adopts policy which is subject to modification at any time to mitigate any perceived adverse impacts. Such a statement ignores the fact that impacts do not begin to show up until after a policy is adopted.

We believe that there will indeed be unavoidable adverse impacts if the proposed GDG is adopted, over and above the short-term unavoidable impacts noted on page 215. For example, adoption of the GDG will result in increased artificial constraints on the supply of available lands for development, and on the supply of housing, with the consequences of increased land and housing costs. This is not an impact with is "subject to modification at any time to mitigate any perceived adverse impacts"; such an impact could be avoided only through considerable revision to the GDG itself.

Another such unavoidable adverse impact will be the encouragement of sprawl in Growth Reserve and Rural areas, since dwelling units will be limited to one per five acres in the Growth Reserve areas, or even one per twenty acres in the Rural area (page 42). Such policies will result in a patchwork pattern of housing units scattered over the Growth Reserve and Rural areas. Land which is devoted to such large-lot uses will as a practical matter be unavailable for redevelopment, should it later become necessary. Far from placing Growth Reserve lands in a "deep freeze" until they are released for development through the LDIS, there will instead be a gradual consumption of such lands in the form of five-acre lots, possibly the most inefficient residential use of land which can be conceived. This is an unavoidable adverse impact, and it should be stated and explored.

Alternatives

The discussion of alternatives in the document likewise suffers from a conclusory approach. The alternatives explored are not described in any detail, and those unfamiliar with the Planning Division's 1980 planning studies referenced on page 200 are at a distinct disadvantage. The alternative growth scenarios described in the draft EIS understandably come to some of the same conclusions regarding land use patterns and costs of growth as those studies did, since they are based in large part on those studies.

However, those 1980 studies have themselves been the subject of much criticism because of what many believe to be some faulty assumptions. Among those is the assumption that

Mr. Harold Robertson
September 30, 1981
Page four

utilities are extended by local government, and are paid for by local government (either a city or a local sewer or water district). In fact, utility extensions are by and large paid for by the private sector, and therefore the assumed cost to government under the Baseline alternative or the New Town alternative may very well be invalid. Again, those 1980 studies blithely assume that infill would be an effective tool for controlling growth, since such lands were readily available for development, and since the political feasibility of increasing densities on those lands was not assumed to be a problem. Neither of these conclusions appears valid, as the draft EIS itself acknowledges (pages 133, 135). Thus, the discussion of alternatives appears seriously flawed to us, based as it is upon these 1980 studies and the misapprehensions in those documents.

Moreover, nowhere is the preferred alternative (i.e., the proposed action) differentiated from the others, making the section difficult to follow and understand. While there is a good deal of useful information on the history and existing conditions of the region, not only in the alternatives section but throughout the document, less attention has been paid to formulating useful alternatives which will truly accomplish the objectives of the County in its GDG (see WAC 197-10-442(2)).

Alternative C on page 208, the "Modified General Development Alternative," is itself probably the most important and useful alternative, but in its present form the discussion is almost useless. The draft EIS evades its responsibility of analyzing alternative methods of attacking the problem by concluding that it is impossible to guess all the possible combinations and permutations of amendments to the present GDG (pages 208-09). We do not mean to suggest that every possible alternative amendment be explored, but certainly some attention could be given to some of the more prominent alternative GDG scenarios which have been advanced. Among these are elimination of the Growth Reserve area, drawing the lines between the Urban/Suburban and Rural areas in a east-west direction, instead of a north-south direction, eliminating or substantially modifying reliance on the LDIS system to release new lands, as well as several others. A couple of these are given merely a one-line mention on pages 208-09. Instead, they deserve more serious and detailed consideration, since these alternatives are among the more realistic ones to be explored, rather than wholesale revisions of the "growth scenario" described on pages 200-08.

Mr. Harold Robertson
September 30, 1981
Page five

Summary

In summary, we have not attempted in this letter to provide a page-by-page critique of every single statement made in the draft EIS. Such an approach is unwieldy and leads to ignoring the forest for the trees. Rather than point out every instance in which we feel language to be overly conclusory or impacts to be insufficiently explored, we have chosen to concentrate on what we believe to be some of the major shortcomings in the County's approach to this EIS.

There is insufficient description of how the GDG will actually be implemented and what the consequences of that implementation will be. When, for example, the LDIS is insufficient, how will new lands in King County be selected for inclusion in the Urban/Suburban area? Where will those lands be? Who will make the decision? Why is there to be a 20-year growth target but only a 10-year supply of available land? Such questions need to be explored now.

With all of the reliance which appears to have been given to the infill/growth reserve strategy in the GDG, the effects of that strategy do not appear to be truly thought through. If, as the draft EIS observes, infill is not really an effective growth encouragement tool in existing communities, where can it be used with any real effect? Only in those areas which are not yet developed, which is not really "infill" at all.

If the Growth Reserve area is to be limited solely to five-acre (or larger) lots until lands are released via the LDIS, won't much of that land in fact be unavailable for development at some future time, since five-acre lots will break up large ownerships and lead to increased sprawl, the very consequence which the County wishes to avoid? Can it truly be said that King County's proposed GDG will have no unavoidable adverse impacts except those short-term impacts identified in the document? We do not believe so.

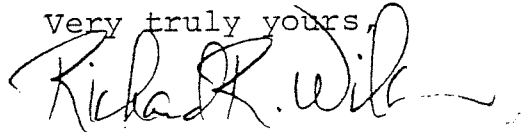
Obviously, predicting the environmental impacts of a basic policy document like the GDG is a difficult task. Specific impacts on specific areas of the County cannot be explored, to be sure. However, the land use impacts of the County's proposed policies can certainly be identified with greater particularity than has been done in this draft EIS.

Mr. Harold Robertson
September 30, 1981
Page six

As our Supreme Court has noted, the difficulty of preparing an EIS for a county comprehensive plan does not relieve the county of its responsibilities under SEPA of exploring those impacts and alternatives.

We believe the County can do a much better job than it has so far done. We stand ready to assist the County in any way we can, including further amplification of the points raised in this letter and more specific identification of impacts which need to be explored in the EIS.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Richard R. Wilson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Richard R. Wilson

RRW:ko
cc: Mr. Gary Tusberg
Mr. Ron Dunlap

15241 N.E. 153rd Street
Woodinville, Washington 98072
September 24, 1981

FOR THE KING COUNTY PLANNING DIVISION

(to be included in addition to oral testimony
on both General Development Guide and the
GDG EIS.)

Councilman Bruce Laing, Chairman
King County Growth Management Committee
Courthouse
Seattle, Washington

Sir:

After perusing 574 pages of King County's proposed General Development Guide and its Environmental Impact Statement, I find myself regretting the timing of the current budget crunch. Had it occurred earlier, a trimmed staff would have been assigned to projects more beneficial to the people of King County.

It seems poor planning for the most metropolitan county in the State of Washington to designate about 2/3 of its land area as permanently rural, with the rural towns limited to only resource industries (timber, agriculture, mining) and commercial undertakings that service those industries. The Guide lists feed and seed stores, farm equipment, welding and repair as permitted businesses in rural towns. The dairy farmers are not enough to support those towns, and if Aberdeen and Hoquiam have turned into ghost towns because of the timber recession, how can towns such as Duvall and North Bend survive with the King County timber industry as their major source of income? Further, a prohibition on breaking up rural-area land ownerships into smaller sites (Policies H 107 and 108) means rural businesses can no longer look forward to increasing business from increasing population.

In contrast, land owners and business people in the closer-in areas designated for pack-em-in development (generally west of a line running roughly north and south of Issaquah) will be windfall beneficiaries of soaring land prices and captive populations. Not only will present residents object to all that in-fill, but they will object to the higher taxes caused by those soaring land values in the designated development areas.

At a time when people wish for less governmental interference, King County keeps piling on the regulations. The officials seem to think man can do nothing but harm to the environment, despite the fact that Seattle's residential areas are as much a tourist attraction as her parks. And as to that old buzz-word scarephrase, "Don't Californicate Washington", a recent trip to California revealed many, many beautiful residential areas with trees, open space, the whole bit. (Even around Los Angeles.) Had there been a General Development Guide and Shorelines Management when Sausalito was developing with such helter-skelter charm on the steep waterfront hills across from San Francisco, there would be no Sausalito.

I vote for the no-action alternative at the top of page 27 of the General Development Guide EIS. The 1964 Comprehensive Plan can be further amended, and new commercial agriculture and commercial timber zoning categories can be created to protect those wishing to continue present endeavors. Seattle reached "most liveable city" with only normal controls, and King County can do likewise.

Sincerely,

Maxine Keesling
Maxine Keesling (483-6565)

cc: Newspapers

September 29, 1981

Mr. Harold Robertson, Acting Manager
Department of Planning and Community Development
Planning Division
Room W-217 King County Courthouse
Seattle, Washington 98104

Dear Mr. Robertson,

The Greater Kingsgate Council (GKC) applauds the efforts of King County to manage growth. The tentative first steps of the county as presented in the Draft Environmental Impact Statement (DEIS) for the King County General Development Guide (GDG) provide a starting point for meaningful evaluation and choice for our future development in King County.

However, the DEIS does not provide any analytical basis for evaluation and selection of alternatives for growth in King County. Citizens have not been given--no it is more accurate to say citizens have been denied--information upon which to judge the level their lives will be impacted and the adequacy of mitigating measures proposed.

The GKC has the official position that we will accept our fair share of the growth of King County BUT only after we have been given levels of service adequate to serve projected growth.

"The policies of the proposed Guide that allow for higher density residential development and the use of existing capacity (emphasis added) in public facilities would encourage more cost-effective provision of public services and would help moderate the cost of those services. The proposed Guide would not significantly affect county revenues¹" is a polyanna view which permeates the GDG. In Kingsgate we are already 25% beyond the design capacities of our major streets according to the Final EIS on the Revised Northshore Development Guide. Drainage systems are sorely taxed. Schools are overburdened. Emergency services such as law enforcement and fire protection have extended response times as these systems designed for a rural population must respond to urban centers. The Kingsgate community hosted the County Council Northshore panel at Kamiakin Junior High in January of 1981 and was told by Councilperson Scott Blair that if we want urban level services we would have to incorporate because King County was not providing urban services, nor would the county give urban level services in the future.

To date Kingsgate has been promised an average development density of four (4) dwellings per acre. While existing capacity is not coping with the demand generated by low density residential developments that have not been "in-filled", the density proposed for urban/suburban communities is seven to ten units to the acre. That is not an acceptable development density for Kingsgate residents. We will do our best to grow at a rate of ten percent (10%) if King County grows at a rate of 10%. But we want our basic services upgraded to urban level services if we are to be an urban area.

The DEIS acknowledges that there would be adverse impacts from "in-filling" as there is "...increased pressure² to develop remaining vacant sites in built up areas with known earth hazards." That adverse impact has not even been subjectively

1. DEIS for GDG, page 26

2. Ibid, page 24

evaluated. But more importantly, it is only the tip of the iceberg for adverse impacts from urbanization in sparsely and low level density suburban areas. It does point out that the GDG is predicated on accomodating growth "...rather than forcing growth to meet community established standards through management of public sector resources and sanctions.³" In Kingsgate we demand growth meet community standards. In Kingsgate we want to see the public sector resources which will be invested to preserve our present quality of life. In Kingsgate we have not seen sanctions at the disposal of King County used in such a way as to direct growth or assume minimal levels of safety in traffic patterns, drainage, police and fire protection, or education facilities for our children. A pat answer to these concerns for service is that they are provided by other levels of government.

Kingsgate residents do not accept the excuse that growth generated by King County land use decisions must be refered to other agencies for determination of service. If coordination is needed, then King County as the designated lead agency must provide it. It is inappropriate and beyond the limited means and corporate charter of a citizen's group to get state agencies, counties, cities, fire districts, school districts, water districts and numerous other agencies such as METRO to coordinate their actions. We have agreed to be taxed and elected our councilpersons so that we might be governed. If King County is not able to coordinate, to communicate, to compromise and to control this vital process, then it should abdicate its charter.

It is stated this plan does not involve physical chages or engineering,"...because the proposed action is the adoption and implementation of goals and policies with associated regulatory changes." Direct impacts will be left for assessment later and "...are considered completely project specific."⁴ BUT WE KNOW OF DEVELOPER MODIFICATIONS TO EXEMPT FROM LAND USE DECISIONS DEVELOPMENTS IN KEEPING WITH THE LOCAL COMPREHENSIVE PLAN. This fatal flaw plays conveniently into the web of developers intent on denying citizens their rights by snarling them in bureaucratic double-talk and elaborate smoke screens like the GDG which promises progress but robs us of an established quality of life.

We are told that County Council ordinance 4152 directed the development of the GDG. But the Guide radically changes the planning principes of the 1964 plan. The 1964 Plan's concepts have been perverted. Those concepts were chrystalized in the 1977 Northshore Communities Development Plan as:

- 1.) Population growth should slowly fill in an already partially developed suburban area to low and medium density residential use.
- 2.) Development should occur along existing patterns set by commercial/ industrial centers and major streets and highways.
- 3.) As development occurs, agricultural uses, open spaces, and the areas many natural amenities should be preserved as much as possible.⁵

While paying lip service to concept 2 the major thrust of concept 1 and 3 has been abandoned in the proposed GDG as inumerated on page 28 of the DEIS. We are specifically promised that growth will not be controlled, to quote "...do not limit growth." Agricultural lands are not even mentioned. We are promised that incentives will be provided to develop around city and town centers. Those incentives are no

3. Ibid, page 26

4. Ibid, page 28

5. Revised Northsore Communities Development Plan, Environmental Impact Statement
page 1

set forth in explicit language in the 261 pages of the GDG nor are they in evidence in the 313 pages of the DEIS. The EIS process is not a formate for promises. The EIS is a process whereby affected parties are given information to analyze anticipated impacts. It is a forum to express views and add facts. King County is not pursuing this process. Instead we are given generalities such as that on page 26 of the DEIS that the "...Guide would provide the opportunity for significant energy conservation, primarily in the transportation and residential heating consumption sectors." The projected 13% decrease in space heating consumption of new residences will occur whether the Guide or "no action" prevails. The estimated energy savings is strictly a matter of structural insulation, dual pane windows, and tight construction required by the revised Building Code. Energy conservation more likely around 40% will be realized by new construction techniques in conventional architecture and that saving will be totally independent of the GDG.

We are promised "...consistency between policies and implementing measures more explicitly than those in the 1964 Plan's Implementation Chapter. The Guide would define relationships between it and community plans; this issue is not addressed at all in the exisiting plan.⁶" But the Guide and the DEIS fall short in their promise. As with the 1964 Paln, we are given a glowing promise of corn as high as an elephant's eye. But there is not plow to turn the sod; there are no irrigation channels to supply water; there is no combine to reap God's bounty and no roads to take it to market. Secondary concerns of a skilled work force of farmers, educational facilities for their children and police and fire protection for their families are also ignored.

"Because the proposed action is the adoption and implementation of goals and policies with associated regulatory changes, it does not involve physical changes or engineering. "This pseudo-caveat is the underpinning of the analytical effort of the DEIS. While it does not satisfy the requirements of the State Environmental Policy Act of 1971 (SEPA) for initiating actions, it does provide a convenient "out" for some hard but straight-forward analysis of alternatives. It also opens the door for such inanities as a promise of sanctions to manage growth and at the same time incentives to bringing in new residential and employment growth including "fast track processing and density increases tied to provision of public or private site improvements, among others."⁸ It is a significant editorial feat to manage to delete any mention of growth management from 261 pages of the GDG and 313 pages of the DEIS except for inclusion in titles for reports and comittees. Growth management, like land use planning are dangerous "buzz" words. They are so prone to misinterpretation or raise false expectations.

Yet the only recognized costs of residential development are the costs of complying with construction and development standards.⁹ No discussion followed of forest harvest, jobs created, financial costs, streets, sewers, water, law enforcement, or fire. Areas of interest and alternatives were not even reviewed. What are the housing costs and comparative value of zero lot line setback, shared wall construction in townhouses or apartment complex planned unit developments as opposed to detached dwellings on conventional lots? What are the costs of apartments and retail sales complexes? How much more tax do they generate over conventional residential construction? And how much retail space and apartment use can a healthy residential community stand before it stagnates and looses direction?

6. Ibid, page 36

7. Ibid, page 28

8. Ibid, page 59

9. Ibid, page 151

Likewise the DEIS surmised that "...impacts of open space policies would be primarily on new developments since it is difficult to superimpose open space on a built-up community. As applied to vacant land and developing communities, these policies would indirectly concentrate development by discouraging development on physically constrained land"¹⁰.

The above quoted statements show a decided bias on the part of King County to look only at the costs faced by developers. There is no reciprocal presentation of benefit to a community. To analyze is to weight costs and benefits to all participants. Both cost and benefit must be assigned some relative value. But no sense of effectiveness or efficiency can be derived if one side of the ratio is ignored and left as an "X".

Under the incessant pounding of a single theme we are told: "No direct commitments of resources would result from the proposed action, since it is a policy document rather than a project."¹¹ "There are no unavoidable adverse impacts associated with the proposed action itself, since it is adoption of policy rather than a physical project."¹²

But Kingsgate residents demand responsible analysis. We will not accept such statements as "the proposed General Development Guide is not expected to have a significant impact on the growth or composition of King County revenue."¹³ This is an IMPOSSIBLE CONCLUSION. How can the conservative estimate of 314,700 people, or a population increase of 25.4% over the 1980 population NOT affect the tax base? This "see no evil, hear no evil, speak no evil" posture flies directly in the face of massive reductions in federal and state governmental expenditure and very specific directives from the highest levels of government that local entities must assume a greater role and portion of the funding of basic services. And if the plan really will not change the growth or composition of tax revenue then why should Kingsgate give up a suburban low density quality of life if economies of scale from increased density will not affect greater county revenues?

Nor it is appropriate for a DEIS to postulate. Analysis should have no presuppositions. The GDG is a wish book of where to direct growth--to urban/suburban communities is the postulate. But the plan does not tell us how to accommodate growth, only that we must. BUT THAT IS NOT PLANNING. IT IS COHERSION. The Urban Village Concept is based on fallacious notions that people will give up their right to live where they choose in the interest of economical travel to work. That concept does not square with established human behavior such as in New York where people commute two hours each way to and from work. That must be painful in addition to expensive. All that will happen is that additional workers coming into our communities will clog our streets, pollute our air, add to law enforcement and fire protection demands and then go back to the communities they choose to live in far from Kingsgate.

Cleopatra observed of Augustus Caesar upon his triumphant entrance into Cairo in Shakespeare's Anthony and Cleopatra that Caesar's promises of dignity to her if she but return with him to Rome meant the chains would be of gold. "He words me" said Cleopatra. The GDG are naught but words. The DEIS gives not substance to

10. Ibid, page 134

11. Ibid, page 199

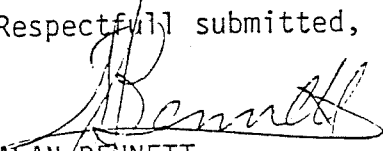
12. Ibid, page 215

13. Ibid, page 172

those words. Kingsgate will not press an asp to its breast. We do ask for growth management. We will accept a strategy to manage growth like that formulated in Ramapo. Determine what are good performance standards for development. Assign development points. Have a scale of one hundred. Then say without a score of forty five with no less than five points in nine critical areas such as (1) fire protection, (2) law enforcement, (3) water supply, (4) Sanitary sewer, (5) transportation (streets and transit), (6) drainage and physical constraints, (7) schools, (8) recreational facilities and areas, and (9) support services such as health centers, retail sales and entertainment, then growth can not occur.

The Greater Kingsgate Council at its regular meeting September 24, 1981 by unanimous vote adopted the above position. Every effort will be made by our members to contribute constructively to policies which lead to positive growth management and aggressive land use control to assure community standards for development are achieved.

Respectfully submitted,


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cc: Ron Dunlap
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September 30, 1981

COMMENTS: DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE 2ND.
DRAFT GENERAL DEVELOPMENT GUIDE.

1. General Comments

In general, the draft environmental impact statement (DEIS) is quite good in its analysis of some of the probable environmental impacts of the 2nd. draft General Development Guide (GDG). The discussion of air quality, for example, presents fairly technical information in a clear and cogent manner.

However, the DEIS is far less successful or complete in describing and/or analyzing the fiscal, economic and social impacts likely to result from implementation of the GDG. Many issues and questions raised in previous comments, and which related to possible impacts of the GDG, have not been addressed or answered by the DEIS. For example, the effects of King County's fiscal capacity on implementation of the GDG's service and facility policies, and the effect of the GDG on land and housing costs and the provision of affordable housing are not directly or fully analyzed. In many instances, data relevant to these issues is merely presented, without any detailed analysis.

The DEIS actually contains little new data or analysis specifically relating to the effects of the 2nd. draft's plan concept; most of the data included or referenced was generated by earlier analysis of different plan concept alternatives. The statement that the urban/suburban communities plan concept lies "somewhere in between" (p. 208) two other alternatives (subcounty areas and transportation corridors) in terms of specific impacts such as density and land consumption, serves to emphasize the fact that the DEIS is often analyzing the GDG's plan concept in only the most general way. Much of the detailed information needed to understand the impacts of the 2nd. draft GDG, and to answer the

questions raised by the GDG, is simply not included in the DEIS.

In terms of the above remarks, these comments go to the adequacy of the DEIS, not in the strictly legal sense of "adequacy", but in relation to the DEIS' usefulness as a tool for understanding the impacts of the GDG, for resolving issues raised by the 2nd. draft, and for enabling county decisionmakers to make informed decisions regarding possible changes to the draft.

2. Scope of the DEIS.

There is some confusion engendered by the language of the DEIS regarding the scope of the DEIS itself and, more specifically, about the nature of the impacts analyzed.

On page 28, the DEIS says that: "Because the proposed action is the adoption and implementation of goals and policies with associated regulatory changes, it does not involve physical changes..." (p.28) Recognizing that it is notoriously difficult to precisely define the scope of a programmatic EIS, it is still unclear just what is meant by the statement that the GDG does not involve physical changes. While it is true that the GDG's plan concept is only a concept, it is equally true that implementation of that concept through the GDG's growth strategy and land use policies will actually produce physical impacts and changes. The distinction, between a conceptual policy plan and physical change attributed to implementation measures, seems somewhat false from an analytical point of view. It mainly serves to minimize the ultimate physical impacts of the GDG's policies in terms of the DEIS, in contrast to implementing regulatory actions. If the GDG will not ultimately and causally result in changes to the physical form of development in King County, what then will it do? It will clearly be the driving force behind any physical changes effected by community plans, functional plans, land development and building activity. The DEIS itself says that the plan concept "establishes the overall direction for physical planning..." (p.29); the attempt to assign impacts to regulatory actions rather than to land use policies seems quite false.

On page 65, however, the DEIS seems to contradict the sentence quoted above regarding physical impacts. It states that the DEIS "focuses on the programmatic effects of the policies being proposed, i.e. the general character of impacts that are likely to occur if the GDG is adopted...impacts are attributed directly to the proposed Guide's policies, without separate discussion of implementing measures. This is because policies would have no impacts without some type of implementation." (p.65) In a causal sense, it is difficult to determine what this statement is trying to say. On the one hand, the second sentence seems to contradict the first concerning impacts. On the other hand, in some cases the DEIS seems to impute impacts to specific implementing measures rather than to the GDG's policies and to then discuss mitigation in terms of implementing actions, rather than in terms of policy (e.g. see discussion of park land deficiency on p. 196). It would seem that the distinction drawn between policy and implementation, in terms of which causes the impacts analyzed in the DEIS, is neither consistently followed nor entirely logical.

In any event, the impacts of a particular policy are very likely to vary, and may vary considerably, depending on the specific implementing measures used. In several instances in the DEIS, alternative implementing measures are discussed and that discussion is usually informative. However, in those instances where general policy is discussed, the level of analysis is very general. The result is that the scope of analysis in the DEIS is very inconsistent and extremely generalized.

3. Density and Land Consumption.

In terms of the density of future development, the DEIS says that it lies "somewhere between the Subcounty Areas [4.4d.u./ac. and Transportation Corridors [30.5d.u./ac.] scenarios..." (p.30) The range between these two alternatives is simply too large to permit meaningful analysis of the GDG's impacts on density. In addition, since density is keyed to the cost-effectiveness

of public services, the range of 4.4-30.5d.u./ac. is too broad to meaningfully analyze the impacts of density on public service costs. In this regard, the DEIS states: "An average density would be encouraged within each residential area which would be high enough to support public services on a fiscally sound basis, provide housing choices and conserve energy by supporting cost-efficient public transit." (p.30) In terms of the DEIS' analysis, which provides no data on what densities are needed to support various public services on a fiscally sound basis, it is not possible to tell whether this assertion is valid.

Adding to this problem of analysis is the fact that the 2nd. draft GDG does not contain an explicit average density goal. While the 2nd. draft does state that a density of 7d.u./ac. is needed for cost efficient transit service (p.12), this density is not a goal of the GDG.

In spite of the fact that the 7 d.u./ac. figure mentioned above is used in the GDG only as an example of the relationship between residential density and cost-effective public service provision, the DEIS hypothesizes that land consumption could be reduced by 50% (over no action) if an average density of 7 d.u./ac. were achieved (p.133). However, in the same sentence, the DEIS states that the Guide does not assume a significant decrease in land consumption rates. While the DEIS may be attempting to establish a general range (i.e. somewhere between not significant and 50%) for possible changes in land consumption, there are too many loose assumptions here and too little hard data related to the 2nd. draft's plan concept, for this range to have much authority. In any event, the DEIS' analysis here does not support the statement that: "the main difference between no action and the Guide would be in rates of land consumption." (p.139) This is not readily reconcilable with the DEIS' assumption of an insignificant decrease in land consumption rates.

4. Open Space.

In describing implementation of the GDG's land use pattern, the DEIS states: "The boundaries between urban/suburban communities and the growth reserve, and the size and location of urban centers, would change with the adoption and revision of each community plan." (p.36) In view of the GDG's proposed use of open space to separate and define urban/suburban communities, it is not clear how open space relates to the growth of urban centers and to the growth reserve area.

The expansion process quoted above sounds very fluid, until the GDG's policies are examined more closely. On the one hand, the economic base chapter's policies establish a maximum size for urban centers based on market area population and the location and size of other centers. Urban centers can not, therefore, blithely expand into the growth reserve area. On the other hand, the plan concept's land use pattern says that "large open spaces separate communities and so enhance the identity of each." (2nd. draft GDG, p.25). Presumably, these large open spaces will have to be relatively permanent if they are to have the intended effect and if they are to avoid being invaded by expanding urban centers. The type of controls applied to these large open spaces will, therefore, determine if large open spaces will continue to separate urban centers. The DEIS is not specific as to the alternatives for creating and preserving these open spaces, nor is it clear as to how boundary changes might impact the open space system.

The DEIS states that: "Without the Guide, there would be less chance for preservation of major open spaces in urban/suburban communities as the county grows." (p.118) This statement may or may not be true; it is simply not possible to tell from the DEIS what the impacts of the GDG on open space will be. While an open space bond issue is mentioned in passing, and while some park acreage deficiencies are noted in the DEIS, these needs are not quantified and not compared to fiscal capacity. Open space -

preservation would seem to depend primarily on implementation, i.e. public dollars, incentives and regulations, rather than on a plan concept. The fact that the GDG provides a "chance for preservation" is of passing interest, but the DEIS provides no analysis of how that opportunity would be realized.

5. Sensitive Areas.

To provide a clearer picture of where sensitive areas are located in relation to urban/suburban communities, the growth reserve and rural areas, it would be helpful to overlay the plan concept map on the sensitive area maps in §III. of the DEIS. Similarly, for the sake of clarity, it would be desirable to include a composite map of all sensitive areas in relation to the plan concept.

The DEIS contains no data on the number of acres characterized as sensitive. Some statistics in this regard would be helpful in visualizing the potential magnitude and location of the plan concept's open space system and in assessing how the GDG's land use pattern will be influenced by the presence of constrained lands.

The DEIS states that implementation of the Guide "should reduce development pressure on hazardous areas in developing urban/suburban communities where much of the land is vacant and where most new growth would occur." (p. 80; similar language found on p. 105). Although the statement is not very clear, it would seem in general that the Guide would tend to increase pressure for development of sensitive areas in existing urban/suburban communities, since they will be encouraged to develop more intensely and to fill in vacant, skipped-over parcels. In fact, the sentence following the one quoted above says that this increase in development pressure would occur. These seemingly contradictory assumptions need to be analyzed and reconciled if possible.

The DEIS contains no data and no analysis of the rationale for the drawing of the boundary lines for the plan concept's growth reserve and rural areas. Presumably, these boundaries are based on topographic features, the presence of sensitive areas, the presence of resource lands, and land supply-demand calculations. This rationale, and the data supporting it, has never been clearly articulated. The DEIS would seem to be a logical place for some explanation and analysis.

6. Land Supply.

The DEIS states that: "All the existing adopted community plans in the western, urbanized part of the county currently provide enough zoned capacity for total forecast residential growth to meet the requirements of the plan concept's growth strategy." (p.40) The Supply-Demand Study (1980) is also cited as indicating that: "taken as a whole there is enough vacant and appropriately zoned land for development to 1990..." (p.127) However, the DEIS provides no detailed information as to where this land is located (e.g. how much consists of infill sites, how much is located in the growth reserve, what about year 2000, etc.) and no information as to how much of this land is currently serviced. Pursuant to the GDG's proposed policies, current zoning is not the sole, or even the major, determinant of *actual* supply; numerous services and facilities are required to be present or planned (pursuant to the CIP) before development will be approved. Nowhere in the DEIS is current zoning capacity evaluated in terms of the GDG's proposed standards. Although the DEIS recognizes that current zoning is less important than the "amount and location of vacant land of varying types" (p.127), it does not analyze land supply in these terms.

Consistent with prior county studies, the DEIS fails to address the issue of actual land availability, as opposed to hypothetical land supply. As pointed out ad nauseum in the

August 1981 comments on the 2nd. draft GDG submitted by the Land Use Research Council, an approach to calculating and monitoring land supply which ignores short-term availability, and which ignores market-oriented qualitative land requirements, is likely to overstate actual supply (i.e. vacant, available and marketable) by possibly large multiples. This overestimation will lead to a constrained supply, driving up land and housing costs. The Real Estate Research Corporation's Infill Study (1981) also stressed the importance of short term availability in calculating land supply. The DEIS, however, seems to blithely accept the GDG's assertion that there is adequate land for future growth; it performs no independent analysis of the possible impacts of a constrained supply of land.

In spite of the DEIS' assertion that there is "more than enough vacant land to meet the county's needs for industrial use" (p.127), there is currently a perceived shortage of quality industrial sites of all sizes, at least from the perspective of the local market. (See Industrial Land Report, Land Use Research Council, 1980) To the user, "vacant" sites are not necessarily available, desirable or in the right locations. The geographic demand for industrial land may not correspond to available supply and locations are not necessarily interchangeable in terms of user needs. The picture of the industrial land market that emerges from the DEIS is oversimplified in the extreme.

Regarding employment growth, the DEIS apparently assumes (consistent with prior county studies) that the existing employment balance between unincorporated King County and incorporated cities is not significantly affected by public policy and land use decisions. The methodology for the four scenarios discussed in §VI basically shifted the geographic distribution of employment growth, while holding the totals and the city-county proportion constant (p.207). This does not

seem completely realistic and the DEIS should include some analysis of these assumptions. If one considers the requirements of certain growth industries (electronics for example), and if one recalls some recent examples of industries choosing locations outside of King County (Hewlett-Packard for example), it should seem at least plausible that if King County's land use policies do not provide the land supply (both in quality and quantity) and the overall environment desired by industrial users, there will be regional shifts in geographic location, both from the county to cities and from King County to other counties. The DEIS provides no analysis of the possibility of these regional shifts occurring.

The DEIS does, however, recognize the flip side of this coin by noting: "Adoption of the Guide could result in higher total consumption [of commercial/industrial land] and a lower total in cities than under 'no action' if its policies calling for a local balance between population and jobs were aggressively followed..." (p. 133) This statement raises several questions. On the one hand, if the GDG's policies are not going to be followed, why bother with them in the first place? On the other hand, what will be the effects on the assumption of adequate land supply if the county attracted more industrial growth than forecast?

The DEIS further states that: "Employment density (and therefore land consumption per employee) for large scale retail and industrial developments such as regional shopping centers would be determined by market forces and technology more than by land use policies." (p.133) This statement does not seem entirely consistent with the GDG's economic base policies which establish population-based market area standards for the size and location of centers. These policies are intended, among other things, to increase employment density and would, in effect, replace market forces regarding the size and locations of centers.

7. Infill.

The DEIS contains no data regarding the expected magnitude of infill development. Based on a reading of the 2nd. draft GDG, it was assumed that a major thrust of the plan concept and phasing strategy was to encourage infill development in designated urban/suburban communities. The DEIS, however, states several times that infill "will not occur on such a scale that it would change overall densities in existing communities or provide a significant part of the housing capacity needed for population growth." (p.133) This statement is somewhat surprising and seems contrary to some of the basic assumptions of the plan concept. Does this, in fact, represent a change in assumptions? What data is the DEIS's assumptions based on? How many d.u.'s and/or acres of land are assumed to develop as infill?

The effectiveness of the plan concept in encouraging infill development is further qualified in the DEIS by imputing most of the impetus for infill development to a "combination of market pressure and rising energy costs...with or without the proposed Guide." (p.135) But even so, the DEIS says: "from a county-wide view point, the amount of residential infill activity probably would be insignificant, especially in terms of meeting housing demand." (p. 135) The DEIS needs to be far more specific regarding the rationale for these assumptions.

8. Land and Housing Costs.

The DEIS seems to make some very questionable assumptions, without any supporting data, regarding the effect of the GDG on the price of land in the growth reserve and on the cost of housing.

The DEIS assumes that the cost of land in the growth reserve will decrease. (p. 152) This assumption seems very tenuous and is totally unsupported by any facts in the DEIS. Common sense would seem to indicate that the opposite effect would occur. The DEIS' basic assumption seems to be that since zoned density potential

will be low in the growth reserve for the near term, speculation and the market value of this land will decrease accordingly. However, since the GDG's policies commit the growth reserve area to urban level development in the long term, there is really less uncertainty than assumed and, possibly, more rather than less impetus for long term speculation. Assuming that the GDG is adopted and followed, and that population growth continues, there is no question that the growth reserve will develop at urban densities. The only uncertainty regards exactly when this will occur.

To more accurately hypothesize what the actions of landowners in the growth reserve will be in response to the GDG's policies, the DEIS should examine property ownership patterns in the growth reserve. If, in fact, large corporations own significant amounts of undeveloped land, they could reasonably be expected to hold this land for ten years or longer and to wait for redesignation. Based on the ultimate projected demand for housing, and once long term holding costs are factored in, land in the growth reserve may be more expensive than it is now, even after allowing for inflation.

There are two fairly obvious ways to determine which of these assumptions about land cost is correct: (1) published studies of the effects of growth management programs on land cost in other jurisdictions could be examined to determine whether costs increased or decreased. This research would at least permit the DEIS to speculate reasonably; and (2) the LDIS, and the annual growth report, could monitor actual changes in land cost in the future. This would permit testing, and necessary adjustment, of the assumptions underlying use of the growth reserve mechanism. None of the LDIS data currently generated or proposed by the GDG relates to land cost factors. This type of information is needed to make difficult policy trade-offs in a well-informed manner. In general, the EIS seems to assume that the GDG will

have some unquantified upward effect on land and housing cost but that this will be offset to some degree by other cost savings (for example in public service costs). Data will be needed in the future to evaluate the validity of this assumption.

The DEIS makes similarly arguable assumptions about the effects of the GDG on housing costs. On the one hand, the DEIS states: "The Guide assumes that opportunities for energy conservation and higher densities in urban/suburban communities in response to market demand will help provide affordable housing and accomodate growth while controlling public service costs." (p.48) The accuracy of this assumption would seem to be directly related to what happens to the cost of land in response to the creation of the growth reserve and to the actual, not hypothetical, ability of the GDG to increase the supply of townhouses, multi-family and manufactured housing. It may also depend on what mechanisms are used to finance services and capital facilities. If, for example, a large proportion of the costs of new facilities is shifted to developers, these costs will be included in the costs of new housing. But, in any event, the use of the growth reserve mechanism is likely to increase the price of all developable land in existing urban/suburban communities, as the DEIS acknowledges. This effect will, in turn, make the provision of affordable housing that much more difficult.

On the other hand, the DEIS seems to say that it does not really know what the effect of the GDG on housing cost will be: "As these two forces affecting the cost of new housing [(1) encouraging residential development in urban/suburban communities which would increase the price of land; and (2) increasing allowable density which would lower the cost per d.u.] operate in different directions, it is not known with certainty what the net effect on housing cost will be." (p.152) While the effects may not be known with certainty, one can reasonably speculate, based on the experiences of other jurisdictions, that the cost of land and housing will increase.--

9. Population Forecasts.

The DEIS presents, without discussion or comment, four different sets of population forecasts for King County (figure 16, p.145). These forecasts contain some significant variations: OFM's two projections are 7% and 23% higher than the PSCOG forecasts. There is no analysis of the discrepancies, no discussion of the impacts if the higher forecasts materialize, and no explanation of which forecasts King County uses and why. The DEIS needs to place these forecasts and their associated impacts in some perspective. The approach of the DEIS is that, since King County's policy is to accomodate growth, the forecasts do not really matter much. However, a potential 23% difference (OFM-2) in projected population growth by the year 2000 could have enormous consequences for land use planning, service demand and fiscal conditions. These impacts should be discussed in the DEIS.

10. Subregional Plans.

Regarding regional planning, the DEIS does little more than repeat the platitudes of the GDG's policies: "The PSCOG King Subregional Plan provides the mechanism for achieving consistency between the Guide, local city plans and community plans for unincorporated King County." (p.44) This is not very satisfying as analysis. While the subregional plan may provide a mechanism in theory, this mechanism may not prove effective in actuality. The DEIS should discuss recent experience in achieving consensus on the King Subregional Plan and place the historical record of intergovernmental coordination through this mechanism in some perspective. An analysis might reveal that, under the current PSCOG structure, the GDG's reliance on this mechanism may be misplaced. In addition, the DEIS contains no discussion of the relationship between the GDG and the growth management plans of other cities and counties, outside the PSCOG framework.

11. Energy Efficiency Criteria.

In the Land Use Research Council's comments on the 2nd. draft GDG it was argued that the proposed phasing criteria for energy efficiency--fuel use between home, work and shopping--was too narrow, overemphasized locational factors, and ignored many other relevant aspects of energy conservation (e.g. density, mix of land uses, building type, site orientation, etc.).

Based on somewhat different reasoning, the DEIS seems to come to the same conclusion: "The efficiency of vehicles is a bigger factor than the number of miles traveled in determining the amount of energy consumed in transportation, at least in terms of possible short term changes." (p.181) Based on this analysis, the proposed phasing criteria for energy efficiency would seem to measure, to a great extent, auto fuel efficiency rather than the energy impacts of the GDG's land use pattern. Either "vehicle miles travelled" or "number of trips generated" would seem to be a more appropriate standard. In any event, an energy efficiency standard should include some means for balancing residential sector energy indicators (e.g. density) with transportation sector indicators since, for some types of development, the savings in one sector may off-set increases in the other.

12. Fiscal Analysis.

The DEIS section on Fiscal Conditions and Public Services contains, at best, a very abbreviated and generalized picture of the GDG's potential impacts on King County's budget. While it contains some analysis of fire and police service, most other public services impacted by growth (e.g. roads, water, surface water) and influenced by the GDG are not analyzed. There are some references to the earlier Fiscal, Economic and Energy Impact Study (1980), but this county study did not specifically deal with the 2nd. draft GDG's plan concept. In general, the

analysis in this section of the DEIS is quite superficial, especially regarding county expenditures for the services and facilities that are theorized to be provided more cost-efficiently pursuant to the GDG.

The DEIS contains no estimates of the total revenues needed to finance projected capital improvements to year 2000, no comparison with projected revenues, and no sense of how the current CIP has scheduled near term improvements. While park land deficiencies for community plan areas are listed (p.196), there is no estimate of what this means in terms of public dollars.

Without some more detailed analysis, especially for those services provided directly by King County or which the GDG would make a condition of development approval, it is difficult to project how the phasing process will actually operate in terms of the county's budget, i.e. whether development will have to be curtailed in some areas because King County is unable to finance needed improvements.

Although the budget is included in the DEIS (figure 22,p.169), there is no analysis of it. Similarly, the CIP is not analyzed to provide a sense of how short-term facility scheduling compares with long-term needs or with the GDG's land use pattern. While the GDG proposes giving CIP priority to maintenance and improvement of facilities and services in designated urban/suburban communities, there is no way to judge the impacts of this prioritization on the overall county budget or on overall service/facility needs.

Rather than merely referring to prior fiscal and economic impact studies, the DEIS should extrapolate and compare this data to projected facility needs and projected revenues. At present, the fiscal analysis in the DEIS is inadequate to assess the impacts of the proposed GDG on King County's budget.

Real Estate Governmental Affairs Committee

710 Cherry Street
Seattle, Washington 98104
Telephone (206) 624-9610

September 30, 1981

Mr. Harold Robertson
Planning Division
King County Courthouse
Seattle, Washington 98104

Dear Mr. Robertson:

Thank you for the opportunity to comment on the draft Environmental Impact Statement on the King County General Development Guide Second Draft. Our organization has held meetings to discuss the proposal, including a presentation and review by planning division staff.

We wish to commend the planning staff for their outstanding efforts in presenting this proposal to public and private organizations throughout the county. They have been most cooperative in their efforts; and, in that same spirit of cooperation we offer our comments on the General Development Guide (GDG).

1. In general, we must take issue with many of the concepts and policies incorporated within the Guide. Excessive manipulation of the marketplace appears to be the primary means of achieving desired goals relating to reduction of public service costs, reduction of energy consumption, a stable time frame for utility planning and even a phased growth concept. We do not take issue with the desirability of most of these objectives, particularly those which address the reduction of public costs as they relate to services and energy costs. However, we do believe that the means of controlling these costs expressed in the GDG may not achieve the desired goals and will dramatically increase the cost of building in the county. Furthermore, the lack of priority given to cost impacts on building, (and in particular residential construction), within the proposal is alarming given the current state of the housing industry, and the prognosis for the near future. In our opinion, the negative impacts of this proposal on building costs, are not adequately addressed in the impact statement in either the "physical environment" or "human environment" sections.

2. In addition to the cost impacts, the proposal fails to establish a means or method to coordinate the policies with other incorporated jurisdictions and special purpose districts. While the Guide touches

on the need to work with these jurisdictions, there are no specific policies which directly address this issue. This is a fundamental matter since (A) the essence of the GDG concept rests with a community approach to growth and development and thus intimately involves the incorporated communities and the purveyors of utility services and (B) development pressures in the unincorporated parts of King County have been intensified due to an unwillingness of some jurisdictions to accept growth.

3. In reviewing the proposal, it is clear that the implementation of the Guide is to be done through the "Community Plan" concept. However, the specifics as to how this is to be accomplished are absent from the proposal. Given the very general nature of many of the policies in the GDG, the implementation of the Guide becomes a matter of significance. As such, implementation should be treated deliberately within the proposal and not left to interpretation after adoption.

4. Related to the matter of implementation is the lack of specificity of many policy statements. Obviously the GDG is intended to be a "general" document. However, without a specific plan to implement the policies or specific definitions of terms (e.g. population approximations for "urban center, rural town," etc.), or specific relationships with other jurisdictions, there are no assurances that those who must interpret the document into specific policies will reach the same understanding as the document's authors.

5. One of the most significant problems presented in the GDG is the growth reserve area. This area incorporates much of the land already under intense development pressure. By placing the GR-5 zone on this land, we believe that: buildable lot costs will dramatically increase, tax revenues to the County may decrease at a most inappropriate time, property rights will be usurped, and a large series of 5 acre estates will be created effectively defeating the desired purpose of holding the land in reserve. We believe this proposal is entirely inappropriate as a means of controlling growth.

6. The problems of financing capital costs are almost ignored by the GDG except to pose a barrier to proposed development. The developer must provide these services where none exist, yet there are no assurances for approval of development upon financing of services. In addition, the county does not yet have a plan for funding capital costs nor is there a definition within the GDG or elsewhere as to what are the "services" which need to be funded, and what level of services are required for any given type of development.

7. The data sources used in determining industrial growth from 1980 to 2000, must be questioned. The source report is from 1979 and it projects no growth in manufacturing and only a 25% growth in wholesale, transportation, communication and utilities, while projecting an approximate 50% growth in service industries and 25% growth in government and education. Obviously, these figures are at least four years out of date and do not reflect current trends.

Letter to Mr. Harold Robertson
Sept. 30, 1981 Page 3

Other questions have also been raised regarding the economic base chapter, its combinations of design criteria, location criteria, and descriptive characteristics. Again, the lack of clear definition of terms and implementing models adds to the confusion of this section.

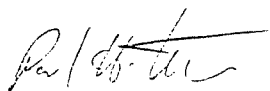
We find it odd that the level of specificity required for design standards is addressed in the document while matters of implementation and coordination with community plans are ignored. In our opinion this section should be restructured with more focus as to overall policy objectives.

8. Another matter of concern is the lack of an alternative to the GDG. We believe that there does exist at least one positive alternative to the proposal which maintains many of the objectives such as reducing energy costs, greater concentration of public services for greater cost efficiency, and an adequate time frame for public utility financing. That alternative is based on a proactive response to growth. Such an alternative may also include the reduction of building and development costs as a major objective. Furthermore, a positive alternative might employ market incentives to the private sector as a means of encouraging growth in desirable areas rather than restrictions on growth in undesirable areas.

There are far too many questions left unresolved, and far too many issues raised by the GDG in its present form. We believe that the proper approach to the management of growth and the reduction of service delivery costs is proactive rather than reactive, positive rather than negative. In addition, particular concern must be expressed for the lack of coordination with other jurisdictions, a lack of a clear implementation strategy and the need for a capital cost financing strategy. We recommend that a third draft of the Development Guide be prepared which advances a clear and positive approach to these problems.

To this end, we will be happy to assist in any way possible.

Sincerely,



Paul A. Roberts
Governmental Affairs Representative



Weyerhaeuser Company

Tacoma, Washington 98477
(206) 924-2345

September 25, 1981

Mr. Ron Dunlap
King County Executive
King County Courthouse
Seattle WA 98104

Re: Second Draft King County General Development Guide

Dear Mr. Dunlap:

Weyerhaeuser Company and its subsidiaries are very concerned about some policies of the proposed General Development Guide ("GDG") and about what we consider inadequacies in the draft EIS for it.

Weyerhaeuser interests and perspectives.

Weyerhaeuser owns 235,000 acres of commercial forestlands in King County. These lands supply logs for our two major sawmills and our plywood mill in the county, and are major sources of logs, chips, bark and other byproducts used in other locations. Weyerhaeuser also buys, sells and trades timber, logs, lumber, wood chips and other forest products produced from other forestlands in the county. Through subsidiaries it develops land in urban, suburban and rural parts of the county. Because we employ over 4,000 persons in the county, we are vitally interested in housing costs and lifestyle factors affecting our ability to recruit, retain and satisfy employees of many different income levels, backgrounds and personal interests.

Within our own organization we have widely divergent interests which, we believe, mirror many interests of the general population. These comments reflect our efforts to reconcile these different and often competing interests. Rather than comment from any one perspective (landowner, lumber manufacturer, homebuilder, employer, etc.), we have sought ways to serve the broad range of interests that our organization shares with the general public.

Shared objectives.

Weyerhaeuser's objectives are much the same as those expressed in the GDG and the EIS, and presumably those of the general public. There are few major arguments about these basic objectives. We want the county to guide inevitable growth into development patterns that use land efficiently and wisely, provide affordable housing and other development in environmentally sound ways,

encourage productive use of farm and forest lands, and provide recreational and other amenities. We would like to see this accomplished at reasonable costs and within generally accepted political and legal frameworks, with rights and aspirations of the public balanced fairly against the rights and obligations of landowners and businesses.

However, we do not agree that the GDG as now proposed will achieve, or further, many of these shared objectives. And we do not believe that the draft EIS is a reasonably thorough and objective effort to explain the probable effects and available alternatives.

Probable effects of the GDG.

The proposed GDG consists largely of negative restraints on land use changes, designed to stop certain development patterns. The draft EIS correctly recognizes that the underlying demand usually will be satisfied in some other way - that development generally will be displaced rather than prevented. We believe that much of this displacement will take forms not anticipated in the EIS, and have side effects that are not intended and not desirable. These would include:

1. Rapid increases in land costs per new residential unit in both urban and rural areas, followed by rapid increases in prices of existing housing;
2. More rapid conversion of undeveloped land to large lot residential tracts;
3. More rapid development of land now held in parcels of less than five acres in the Rural and Growth Reserve areas;
4. Increased displacement of low/moderate income persons from rural areas, and increased concentrations and overcrowding of these persons in urban areas;
5. Reduced construction activity in much of the county, which would reduce employment and tax receipts;
6. Severe "growing pains" in the present urban-suburban areas, which would have to absorb new development and new population at much faster rates; and
7. Increased legal and political uncertainties, because new restrictions on the Rural and Growth Reserve areas would be imposed faster than offsetting reductions can be implemented in the urban-suburban areas.

Our reasoning is outlined in the attached comments on the draft EIS, which were prepared by persons familiar with the local markets for land, timber, logs, homesites, homes, and commercial real estate. I think their views are important,

as they give some indication of how private landowners and businessmen generally might actually respond to the GDG. The private market response is the "proof of the pudding" - if the market does not respond as the planners expect, then the result is unlikely to be what the planners intend.

A Positive Alternative

Much of the draft GDG is well done, particularly the philosophy of encouraging more compact development patterns. Most of the design standards also are satisfactory, although some engineering standards for road construction and water systems would require unnecessarily high costs.

Our differences center on two major concepts:

- (1) that the county can and should artificially manipulate the supply of land available for development by imposing drastic restrictions on wide areas and then "releasing" land in response to perceived supply/demand relationships, and
- (2) that lands be planned for a density lower than that ultimately expected, with the idea that this preserves options for later redevelopment at higher densities.

We believe it would better serve the public interest to:

- (1) Rely on market factors to determine when particular lands are developed and
- (2) Rely on planning and regulation to control how development occurs, through performance standards to control density, quality and environmental characteristics.

For example, rather than artificially restrict subdivisions in the Growth Reserve area by "temporarily" imposing a 5-acre minimum lot size, we think it better to (a) attract development away from these areas by simplifying regulation in the urban-suburban areas, (b) discourage development in these areas by slowing construction of publicly funded transportation and utility services to them, and (c) require any development in them to reflect the density and design standards ultimately expected. If 10,000 homes can be attracted to the urban-suburban areas from 5-acre lots in the Growth Reserve areas, 50,000 more acres of the Growth Reserve remains undeveloped. If 10,000 homes in the Growth Reserve areas can be put on one-fourth acre lots rather than five-acre lots, 47,500 more acres of the Growth Reserve remain undeveloped. In short, the best way to protect rural areas from development is to fill as much of the demand as possible with high density development, both outside and inside the rural area.

Mr. Ron Dunlap
September 25, 1981
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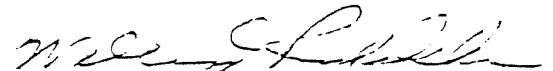
Weyerhaeuser Company

It is very difficult to increase the densities of established, stable residential areas. Large minimum lot sizes do not protect future land use options. They attract a particular type of resident - one who wants (and can afford) five acres for himself and insists that any neighbors also have at least five acres. The Rural and Growth Reserve categories surely will be misinterpreted as a county commitment not to allow higher densities until the local residents - rather than the market or the county officials - are ready. The local residents may never be "ready." The area will become committed to very low density residential use indefinitely - and not available either for higher density development or for farming and forestry uses. Therefore we believe the initial development should be at the final density wherever possible.

As the draft EIS correctly points out, the county has little control over the demand side. It can, however, influence the density, design and quality of development. This can be done negatively, by prohibiting certain types of development, or positively by affirmatively encouraging desirable development patterns. Some elements of negative restraint are unavoidable, but we believe the county should rely to the maximum extent possible on a positive approach.

The GDG contemplates some positive steps, for example, "upzoning" some suburban areas for higher densities, at some later time. These should precede the development restrictions contained in the GDG. We believe the market would respond so well to the positive approach that many regulatory burdens of the proposed GDG would prove unnecessary.

Very truly yours,



William D. Ruckelshaus
Senior Vice President

WDR:dm95/1007/c1

cc: King County Council Members

Mr. Gary Tusberg

Mr. Harold Robertson

COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR
KING COUNTY GENERAL DEVELOPMENT GUIDE

Weyerhaeuser Company and its subsidiaries submit the following comments on the draft environmental impact statement for the King County General Development Guide ("GDG").

A. Probable market response to large lot size provisions for "Growth Reserve" and "Rural" areas.

A key assumption of the draft EIS, and of the GDG itself, is that the large minimum lot sizes in the Growth Reserve and Rural areas will effectively shift residential demand to the urban-suburban areas without unreasonably increasing housing costs. The draft EIS correctly recognizes that the underlying development demand usually will be satisfied in some way. Thus the five, twenty and thirty-five acre minimum lot sizes are intended to displace new development from the Growth Reserve and Rural areas. This displacement would take some combination of the following six forms:

- (1) displacement to more urban areas;
- (2) displacement to rural areas;
- (3) more widespread development on 5+ acre tracts within the Growth Reserve areas and 20+ acre tracts in the Rural areas;
- (4) more rapid development, under "grandfather clauses" or variances, of pre-existing lots of less than the new minimums;
- (5) less new construction, with slower rates of demolition and more people living in existing structures; and
- (6) fewer people living in the county, but perhaps more people commuting into it from neighboring counties.

Throughout the draft EIS there seems to be an assumption that effect number (1) will occur to the virtual exclusion of numbers (2) through (6). However, no case histories from other communities, public opinion surveys, or other data is given in support of this crucial assumption. To the extent that displacement takes forms (2) through (6), the environmental effects of the GDG will be very different from those described in the draft EIS. Therefore we think this central assumption should be analyzed carefully. And no matter what forms the displacement takes, we believe that substantial housing cost increases will result.

More information is needed to assess the probable market response to the GDG. How rapidly has development been occurring in the "Growth Reserve" and Rural areas? Has the rate of development in these areas been accelerating or declining? What are the reasons for development locating in these areas, and how will large lot sizes affect these reasons? Of the development occurring in these areas in the last few years, how much would have been permitted under the proposed GDG? How might the remaining development have been modified to comply with the

proposed GDG? Assuming that residential development will be permitted on existing lots of less than the "minimum" size, either by a grandfather clause or through variances, how much development could occur on pre-existing lots of less than the new minimum sizes?

Even if most of the displacement is expected to take form (1), the possibility of and possible effects of each of the other displacement modes should be carefully examined. The EIS should explain how the occurrence of these other five modes could be detected if they do start, and how the county could respond. If the county arbitrarily refuses to admit that they might occur, it will be unable to recognize them, or to respond appropriately if they do.

Regarding the second mode, it seems to us that much of any development "squeezed" out of rural fringe areas will move to more remote areas. An opinion survey of recent home buyers in the Growth Reserve areas might indicate where their second choice would have been if they could not have moved into that area.

Similarly, regarding the third mode, there should be estimates of the number of additional 5+ acre tracts likely to be developed within the Growth Reserve area. Our experience suggests that relative land price per allowable housing unit is a key factor in determining the rate of development at various densities. If many half-acre lots are available nearby at, say, \$20,000 each, then a 5-acre tract in a 5-acre minimum lot zone might sell for \$40,000 - indicating that the market will support "premiums" of 100% and \$20,000 for the 5-acre tracts over half-acre lots. If a shortage of half-acre lots occurs and their price approaches that of 5-acre tracts, the rate of development of 5-acre tracts will increase until their supply is reduced to reach a new equilibrium at a higher price level. Qualified economists should be able to make some reasonable estimates of these relationships between price and consumer choice. Has the county consulted any economists with expertise in these areas?

Regarding the fourth mode - more rapid development of pre-existing "sub-minimum" lots - the EIS should contain an inventory of existing "subminimum parcels" by area, policies on when development will be allowed on these lots, and estimates of how much development might occur on these lots under these policies. Most communities with minimum lot sizes exceeding one acre "grandfather" pre-established lots of smaller size. Others generally make variances quite readily available. Since a tract less than five acres is not economically suitable for commercial timber growing or farming, denial of residential use effectively confiscates most of the market value. Without a grandfather clause or a lenient variance policy, this raises constitutional, property tax, and political problems.

Fifth, we believe the GDG would reduce the rate of new residential construction for the county as a whole, at least temporarily. For the short-term (one to four years or so) this probably would not effect the number of available jobs. Instead, presumably there would be some increase in the number of people living in existing structures (home sharing arrangements, conversion of larger houses to duplexes and triplexes, conversion of basements and garages to "mother-in-law apartments," etc.) and some reduction in the demolition rate (which raises the average age of the housing stock and usually the percentage which does not meet current minimum standards). These phenomena traditionally are associated with economic decline, racial and economic segregation, crime and other social problems, etc. We are not

predicting that this necessarily will happen. Case studies from other areas may show that these problems do not occur where the cause of overcrowding and delayed demolitions is regulatory restraints on new construction rather than market factors. However, the EIS should analyze the amount of overcrowding and delapidation likely to occur, and analyze its environmental and social significance.

The sixth and final form of displacement is a reduced population, perhaps with more commuting into the county by persons living outside it. Again, we believe that the GDG would slow the rate of residential construction faster than it slowed the rate of new job growth in the early years. This suggests increased commuting. Over the longer term, though, any housing shortage would reduce the rate of new job creation. The difference in price for a typical suburban home between areas of "lenient" and "strict" land use regulation may easily exceed \$50,000. For most prospective new residents this means an additional \$10,000 down payment, an additional \$600 in monthly payments, and substantially higher insurance and property tax costs. This can drastically effect the ability of businesses to attract and retain employees. More jobs will be created in areas where the housing market is not unreasonably distorted by land use regulation.

In summary, the EIS assumes that the GDG will displace (but not eliminate) substantial amounts of development demand, but that substantially all of the displacement will take only one of six foreseeable forms without unreasonable price increases. Any evidence, in the published literature or elsewhere, supporting this assumption should be presented or referenced. The possibility that significant portions of the displacement might take one or more of the other forms should be discussed. Contingency plans should be developed in case unreasonably large portions take one or more of the other five forms. The probable effects on prices, particularly housing prices, should be more thoroughly studied.

B. Protection of and Forestlands Productivity.

We believe the best way to maintain the productive forestland base over the long-term is to encourage high density development, in both urban-suburban and rural areas under design and performance standards assuring appropriate quality control. The forestland base is not threatened by traditional subdivisions (half-acre lots and less) so much as by scattered development on larger tracts. For the forest manager, a few widely scattered "neighbors" are more troublesome than larger numbers of people clustered in a few small lot subdivisions. When we wish to build roads, harvest timber, burn slash, apply chemicals, or take the other steps essential to modern forestry, the number of neighbors itself is not a problem so much as the number of points within the commercial forest area at which there is some development, even a single house.

Development of adjacent lands need not conflict with commercial forest management. Persons who develop in and near commercial forestlands, and persons who occupy and use these developments can plan their activities with the understanding that forest road construction, timber harvest, slash burning, use of chemicals and other normal forest management activities will occur periodically on the nearby forestlands. This is largely a matter for education - of attitude - rather than for regulation.

Virtually all developable lands in King County are biologically capable of growing - over some period of time - commercially valuable timber. However, it is not economically feasible to utilize many of these lands for commercial timber production, as they will not grow timber fast enough to produce a reasonable economic return. Further, it is not socially desirable to dedicate all of the economically viable commercial timberlands to timber use without regard to the needs for other land uses. Thus the decision on whether to convert timberlands to other uses must balance biological, economic and other other factors.

EB 309 and 310 restate old county positions regarding environmental problems allegedly caused by forest practices without recognizing that they since have been alleviated by the Forest Practices Act, Ch. 76.09 RCW. We are not aware of any significant environmental problems in the county caused forest practices that complied with the 1976 forest practices regulations, Tl. 222 WAC.

Finally, the psychology of rural landowners is extremely important. Silvicultural investment occurs mainly in the early years (for site preparation, planting, brush control, and pre-commercial thinning). In this area timber crops generally produce no revenues for 40 or 50 years or more (not 20 years as suggested by EB 308). For private forestland owners, particularly small owners, to make silvicultural investments, they must be assured that they can later harvest their timber without unreasonable restrictions. Many landowners fear that the county might unreasonably restrict forest management activities. Any planning or regulatory program which severely restricts use of rural property often seems to confirm these fears. The GDG and the EIS should clearly and strongly support forest management under the state Forest Practices Act, recognize that forest management is normal and desirable on commercial forestlands including those adjacent to other land uses, and disavow any intent to impose local restrictions except in cooperation with state agencies through the Forest Practices Act.

Many rural residents desire a diversified economic base, as do we and other rural employers. A diversified and healthy local economy helps assure that labor and equipment are available when needed for forestry work. Without economic diversification the young people tend to leave the rural areas.

C. Plans and Policies of Incorporated Areas and Adjacent Counties.

A major assumption of the GDG, and the EIS, is that incorporated areas will accommodate all or most of the development squeezed out of the Growth Reserve and Rural areas. Many of these areas are incorporated, and may have land use plans and policies inconsistent with King County's assumptions. Has King County determined how much additional growth the incorporated areas are willing to accept? Would they be required to amend their existing comprehensive plans, zoning ordinances and policies to accommodate this growth? Can they accept a dramatically increased rate of growth without over straining their staffs, physical facilities and local environment?

As discussed above, some of the development demand will or might be displaced to neighboring counties, particularly Pierce, Kitsap and Snohomish. Are they willing and able to accept increased growth rates if development is displaced from King County? King County is required to consider these extraterritorial effects under S.A.V.E. v. Bothell, 89 Wn.2d. 862 (1978).

D. Public and Private Infrastructure Investments.

The EIS seems to assume that most infrastructure investments for roads, sewers, water, parks, etc., are financed through general county tax revenues. This is not the case. Much road and highway construction is financed by federal or state governments, or by special assessments paid by the local property owners, or by land developers (who recover their costs in the sale of the developed property.) Sewer and water facilities are financed primarily with federal funds, special assessments, and direct investment by private developers. Historically many county parks have been donated by developers or other private parties, or transferred from other governmental agencies at no cost to the county, or financed by special assessments. The EIS should indicate the sources of funds for the major types of infrastructure development occurring in the county in recent years, i.e., how much of the road, sewer, water, and park facilities were paid for from federal, state, county general fund, special assessments, developer investment, and other sources.

E. Transportation and Energy.

The draft EIS seems to assume that most jobs are and will be in or near Seattle. This is no longer true. Most of the net new jobs created in the past several decades have been in suburban and rural areas. In fact, many people now "reverse commute" from Seattle to jobs in Woodinville, Redmond, Issaquah, Auburn, Federal Way and other areas recently considered rural. The GDG is designed primarily to deal with new development.

If it is assumed that by rehabilitation and replacement the existing residential areas can provide homes for those employed in the existing commercial and industrial facilities, the question then becomes planning for new residential construction basically in response to newly created jobs. Of course the individuals holding the new jobs may not be those occupying the new housing, but a geographical correlation can be expected between net new jobs and net new housing. What parts of the county are likely to experience net increases in jobs? Will the GDG increase, decrease, or not affect the ability of the housing industry to provide new housing in and near these areas of employment growth? It may well be that the sites available for "infilling" are not near the new jobs, and that increased residential development in the Growth Reserve areas would reduce, rather than increase, transportation costs and energy consumption.

E. Implementation Problems.

The draft EIS does not adequately explain how the GDG would be implemented.

For example, it assumes that the county will "release" lands for development as demand is demonstrated through the Land Development Information System (LDIS). Information on how this system will operate is very sketchy. If the system relies on the recent past to determine demand, how will it respond to any sharp upturns in demand if, for example, there is a major drop in interest rates or a major new employer moves into an area? The construction industry, and particularly home building, is notoriously cyclical. Will the LDIS help dampen or accentuate these cycles?

What will be the initial start-up costs and annual operating costs of the LDIS? Will additional staff and funding be made available to operate the LDIS? If staff and funds will be diverted from other activities, which activities will be affected and will this delay the processing of development permit applications? The county did not process subdivision and building permit applications within a reasonable time during the last strong market (1976-79). We are concerned that any diversion of staff from permit processing to operation of the LDIS might contribute to more unreasonable delays in the next strong market.

How does the GDG relate to the community plans? If an urban or suburban community strongly resists increased development, is the county prepared to overrule local opposition to maintain the conceptual integrity of the GDG? Existing residents in suburban areas often want large minimum lot sizes while the rural areas often want small minimum lot sizes, in direct contradiction to the basic philosophies of the GDG. Has the county conducted any formal or informal surveys to determine whether the community councils, advisory committees, and other citizen organizations are willing to help implement the GDG in their own areas?

Finally, we are very concerned about the apparent time lag between development restrictions in the Growth Reserve and Rural areas and the expected increase in development densities in the urban and suburban areas. Often it takes several years from project conception to reach the formal permit stage. Many projects in the early planning stages probably would be canceled as soon as the Growth Reserve and Rural provisions were implemented. It would take some time for a comparable volume of urban and suburban projects to reach the same stage in the development process. Therefore, even if the GDG worked exactly as the EIS drafters contemplate, construction levels would be temporarily reduced unless upzoning of urban and suburban areas preceded the effective date of the GDG by at least a year or two. Has the county considered delaying the effective date of the GDG to avoid this problem? Are any other steps contemplated or available to ease the transition from the existing development patterns to those contemplated by the GDG?

G. Alternatives

Of course there are an infinite number of alternatives available through eliminating or adding, tightening or loosening, or otherwise modifying various types of restrictions, incentives and information. No EIS could explore all of them in detail. However, we believe that the limited number of alternatives described in the draft EIS are not adequate to reasonably inform the decision-makers of the policy options available to them.

Most of the "Alternatives" section deals with alternative development patterns, rather than alternative roles for the county to play or alternative ways to guide development. There seems to be an underlying assumption that the only appropriate role for the county is to prohibit certain types of development in certain areas, with the assumption that it will be displaced into a more desirable area. At least the following conceptual alternatives also should be considered:

1. Provide incentives for desired development, rather than only focusing on what is not wanted;

2. Remove existing barriers to desirable development, rather than only creating new barriers;
3. Emphasize compatible mixing of different uses (residential, commercial, industrial, natural resource, recreational), rather than spatial separation of them;
4. Emphasize pre-established design standards, rather than case-by-case discussion in response to individual project proposals;
5. Update the 1964 Comprehensive Plan; for those areas that require updating, but keep those portions of the 1964 plan that are working well.
6. Reduce land use regulation (do areas having less land use regulation really have less desirable development patterns than King County?)
7. Delay implementation of proposed new restrictions on development in the Rural and Growth Reserve Areas until at least one year after offsetting density increases in the urban-suburban areas are implemented. This is necessary to avoid a disruptive lag between implementation of development restrictions in the Eastern portion of the county and actual construction of higher densities in the urban area.

H. Conclusions.

We have reviewed the draft EIS and proposed GDG from several perspectives: as a major grower, purchaser and processor of timber; as a major developer in urban, suburban and rural locations, and as a major employer vitally concerned about lifestyle opportunities for our present and prospective local employees.

1. We found the draft EIS to contain a wealth of useful statistics and descriptive information on past and present events and trends, which undoubtedly required substantial work by many dedicated people to assemble. The description of existing conditions is well done. Our concern is the shortage of predictive data and analysis on how the proposed GDG and its alternatives will affect the future. We realize that predictions are difficult and may prove inaccurate. Nevertheless, a meaningful EIS must emphasize alternative futures based on the best available projections, rather than merely describe the past and present. The County is not obligated to predict every possible effect, and is not bound by any good faith projections it does make. However, it has an obligation to make good faith efforts to predict the effects of its proposal and a reasonable range of policy alternatives, to the best of its ability. More predictive data could and should be provided. Where predictions cannot be made with any reasonable confidence, this should be fully disclosed.
2. The GDG and EIS assume that increased construction at higher density will occur in the urban-suburban areas simultaneously with reductions in the rate of development in the Rural and Growth Reserve areas. Resistance from existing residents in the urban-suburban areas seems inevitable, particularly as development pressures mount from prior implementation of restrictions in the more rural areas. Even if the urban-suburban areas were willing to

accept substantially more development, there will be a time lag between the reduced development rates in the rural and Growth Reserve areas and the increased densities in the urban-suburban areas. How is the demand to be satisfied during the transition period without unreasonably increasing prices?

3. We find the GDG and the EIS to be profoundly and unnecessarily negative in tone. There seems to be an underlying assumption that most change is bad, that most developers and landowners are untrustworthy, and that human behavior is best modified by criticism and punishment rather than by encouragement and reward. Land use issues involve long-term commitments; they must be resolved in an atmosphere of political and economic stability. A more positive approach - relying on incentives where possible - would be more effective over the long-term.

The Quadrant Corporation
A Weyerhaeuser Company



September 30, 1981

Mr. Ron Dunlap, County Executive
King County Courthouse
Seattle, WA 98104

RE: General Development Guide - Second Draft
Draft Environmental Impact Statement

Dear Mr. Dunlap:

These comments regarding the General Development Guide - Second Draft (GDG) and the associated Draft Environmental Impact Statement, are to further amplify those found in the letter from the Weyerhaeuser Company.

The Quadrant Corporation is a business park and residential developer in addition to home building and commercial property management. As such, we take a long range view of growth patterns and respond to provide housing and employment facilities. How the GDG and subsequent community plans affect these markets is of great interest in terms of being able to meet the needs of home buyers and employers. How those needs are met could well be limited by adopting and implementing this draft of the GDG.

The Quadrant Corporation, like others in the business, monitors the existing and potential market factors affecting development opportunities and eventual sales. Beside the basic statistics produced by King County and the Puget Sound Council of Governments showing significant growth, we look at consumer preferences, energy costs, national money markets and other factors going beyond the projected number of units or acres required. In this respect, we foresee a large demand for all types of housing units and increases in business park and office activity throughout King County.

The demand will not only be centered in Seattle and the first ring of adjacent cities. A great majority of industrial type uses would locate in existing and probably new suburban business parks. These parks would be in the south, east and other portions of the County based on needs of the eventual users. In addition, possibly one quarter or more office space would be so located. This

Mr. Ron Dunlap
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employment growth is creating or reinforcing other large employment centers outside of Seattle. The housing market shows unmet demands for single family and other residential units. Again the demands are not limited to the "infill" areas. The "infill" areas may satisfy limited needs, possibly higher density units on expensive land. There should be the ability to provide for lower density or detached units to meet needs related to these housing types and possibly at lower prices.

Taken together, there appears to be a strong growth potential affecting the suburban/urban area and most probably the "growth reserve". While the GDG generally recognizes these factors, there is the underlying assumption to "put the brakes on" the potential growth in the outlying areas. This is accomplished by a monitoring or control strategy to increase "infill" development and limit most outward expansion in the "growth reserve". Unfortunately, the monitoring strategy is based on the assumption of one party to control growth - King County. How that authority or responsibility is exercised may be out of kilter with the variety of consumer preferences, pricing structures, money markets and other significant constituent factors affecting the delivery of needed housing units and employment facilities.

One example of a primarily unilateral effect on these growth and market factors is outlined. The growth reserve has been identified as the future urban/suburban expansion area. Implementing this concept, as envisioned in the GDG, is subject to continuing costs and problems.

1. The cost for the Land Development Information System (LDIS) would require continual budgeting for the life of the GDG to insure updated and possibly reliable data affecting some or all of the community plans.
2. The "reliable" data may be based on factors to slow growth rather than identifying available lands, opportunities or needs.

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3. The timing for utilizing this data may take years. The LDIS could require one year to monitor followed by the assessment of making changes to community plans. The eventual hearings and land use changes may add to a timeframe lasting up to two or three years. The time factor alone could have the effect of slowing development or causing out-of-step construction starts relative to interest rates, consumer demands or other events outside of the control of the County or developers.

Other approaches may be more workable, especially since the GDG contains many standards related to how development would occur either in the reserve or urban/suburban areas.

Without going into detail as to specific comments about various policies, we would offer the following:

1. Utilize a growth strategy more akin to the 1964 Comprehensive Plan. There have been additions to King County plans and regulations which should increase the ability to implement a strategy more related to the 1964 Plan yet be time responsive to shifts in the housing and employment markets.

More reliance on how development should occur tied to the provision of services and facilities provides a positive base for new development policy. The GDG has an array of sensitive lands, landscaping and other such policies to provide a basic prescription of how development should be implemented. The ability to provide services and facilities adds an element of timing.

2. There should be more explicit ties to the community plan process as to defining county-wide needs to insure a more equitable distribution of growth. In addition, the community plan should be subject to amending based on more workable criteria.
3. The large parcel policies need to be clarified to provide for such opportunities. Large parcel proposals should be possible within the context of the GDG as well as through community plans.

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4. A more unified approach to economic policies to provide the basis for meeting needs in urban centers and new centers. The policies place emphasis on growth in existing centers which may be limited due to available land or other reasons. Even though there are policies for planning and designating new centers there may not be a clear basis for doing so. Some rearrangement of policies and wording ties could link the existing and new into a clearer, less potentially contradictory context.
5. A recognition that over-control will raise the cost of development - costs passed on the the home buyer and employer. For example, knowing that a variety of factors has caused costs to increase, the effect of regulation is most apparent in land prices. In 1974, average developed residential lots were selling for \$3,000 to \$6,000 as compared to now for \$20,000 to \$23,000. Part of the increase could be due to a second factor being higher prices within "infill" areas causing upward movement in the reserve area. Prices, notwithstanding local variations, will be pushed upward if predominantly "infill" prices set the pace. Supply in the reserve area would have a tendency to keep prices as low as possible. The EIS describes the opposite which needs to be further explained or modified.
6. The utilities policies are based on meeting the community plan projections. The six to ten year life of a community plan is not a consistent horizon with normal utility planning. The GDG should provide a better base for longer range utility planning. The community plans could provide the basis for shorter range implementation actions, taking into account potential development beyond the six to ten year timeframe. Such an approach is amenable to the future urban/suburban scenario for the growth reserve. Also, longer range planning could assist the utility purveyors in matching facilities with rate structures, longer range development opportunities and prevent the reconstruction of new lines to meet needs beyond the six to ten year period.

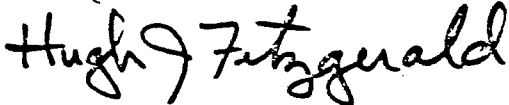
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Page 5

We believe these comments may cause some consideration of basic concepts and assumptions. In this respect we have commented on entire sections so affected. We would be happy to supply additional comments or further clarify the above responses.

King County has the opportunity to provide a broad based plan for meeting growth over the next twenty years. The interests of many groups and individuals, community associations, environmental, business and others, need to be integrated to provide that base.

Sincerely,

THE QUADRANT CORPORATION



Hugh J. Fitzgerald
President

JS:ek

cc: County Council Members

Paul Barden
Bill Reams
Tracy J. Owen
Scott Blair
Lois North
Ruby Chow
Bruce Laing
R.R. "Bob" Greive
Gary Grant

Gary Tusberg, Director
Department of Planning and Community Development
Harold Robertson, Manager ✓
Planning Division

B. Comments on the Supplemental Draft EIS

The following comments on the Supplemental Draft EIS are arranged alphabetically and reproduced as received.



Glacier Park Company

REAL ESTATE DEVELOPMENT AND MANAGEMENT

A SUBSIDIARY OF BURLINGTON NORTHERN INC.

JUL 12 1984

July 6, 1984

Mr. Harold Robertson, Manager
King County Planning Division
710 Alaska Building
618 2nd Avenue
Seattle, Washington 98104

Re: Comments on the Draft Supplemental Environmental Impact Statement
for the Executive Proposed General Development Guide

Dear Mr. Robertson:

Glacier Park Company, the land and real estate development company of Burlington Northern, has a strong interest in the management of growth in King County. We have reviewed the draft Supplemental EIS for the Executive Proposed General Development Guide and have the following comments.

The Supplemental EIS, implies that the revised action is substantially the same as the earlier proposed action. While we agree that both the Second Draft of the General Development Guide and the latest Executive proposed version share many points, we believe that there are also significant differences which should be clearly identified in the Supplemental EIS and should also be evaluated for comparative impacts. These general differences include:

- ° The removal of the Growth Reserve land use designation in exchange for only Urban and Rural designations.
- ° An increased reliance on an in-fill strategy.
- ° A lack of plan amendment procedures in the Executive proposal compared to more clearly identified steps in the Second Draft document.
- ° An apparent emphasis on "permanent" boundaries as opposed to boundaries with a stated ten to twenty year life.

Specifically, we have the following observations about the manner in which impacts were identified or analyzed, the choice of alternatives discussed, and the conformance of the Supplemental EIS to SEPA Rules.

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July 6, 1984
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1. What are the comparative impacts of not having a Growth Reserve area designated in the Executive proposal? Since this designation was central to the Second Draft of the Guide and all community plans to date incorporate a Growth Reserve zone, some discussion should take place regarding the practical land use impacts of not having this designation available.
2. King County is not evaluated within a multi-county context. Actions taken in accordance with the new General Development Guide will have secondary impacts on land development in other Puget Sound counties. These should be identified and discussed for significance. If the impacts are not significant, the rationale for this decision should also be identified.
3. The Executive Proposed Guide relies more heavily on an "in-fill" development concept than the Second Draft Guide. What is the basis for this change when the earlier plan documents indicated that only a small proportion of county growth could be accommodated by in-fill. As an example, on page 133 of the EIS for the Second Draft Guide, it states that residential in-fill should be encouraged when appropriate "...but would not occur on such a scale that it would either change overall densities in existing communities or provide a significant part of the housing capacity needed for population growth."
4. The implementation measures included in the Executive Proposed Guide do not include development of amendment procedures or a method in which boundaries between urban and rural areas can be changed. What are the long-term land economic impacts of what the Guide calls "long-term and unchanging" lines on the plan map? This question seems especially significant when on page 105 of the Executive Proposed Guide boundary changes are to be allowed "only when new information proves original boundaries were in error." Shouldn't market information be included in a regular review of boundary locations? What are the land development and land economic impacts of not integrating market information into an evaluation of land use boundaries?

With reference to SEPA Guidelines and the Supplemental EIS, we have the following comments.

1. An EIS for a "non-project proposal" should identify "subsequent actions that would be undertaken by other agencies as a result of the non-project proposal such as transportation and utility systems." The impact discussion of the EIS for the Executive Proposed Guide does little to identify the fiscal impact of the Guide on municipal and special purpose districts even though the Guide encourages in-fill development.

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2. SEPA Guidelines also indicate that agencies are encouraged to describe the proposal in terms of alternative means of accomplishing a stated objective and that these alternatives be assessed at a roughly comparable level of detail to sufficiently evaluate their comparative merits. We recognize that several general alternatives were discussed in the Second Draft Guide, however each alternative was a separate development concept in its own right and does not necessarily meet the stated goals of the Executive Proposed General Development Guide. A new alternative section should be prepared that identifies feasible alternatives to the performance goals of the Executive Proposed Guide. One valid alternative that should be addressed is allowing large parcel development in Rural designated areas as well as Urban designated areas. Such development with specific performance criteria would be consistent with virtually all goals regarding economical development of utility and transportation infrastructure and provision of housing diversity. This kind of alternative would relieve the potential of artificial market pressure in in-fill areas and also preserve many of the natural features of rural county areas.

Thank you for the opportunity to comment on the Supplemental Draft EIS. Should you have any questions please do not hesitate to contact me.

Sincerely,

Steven L. Wood
Vice President-Law

cc: James Brady
Dale Sherfy

KING COUNTY PLANNING DIVISION
JUL 13 1984
DRAFT

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Mr. Harold Robertson, Manager
King County Planning Division
710 Alaska Building
618 Second Avenue
Seattle, Washington 98104

Re: Draft SEIS,
King County Proposed General Development Guide

Dear Mr. Robertson:

On behalf of The Quadrant Corporation and Weyerhaeuser Real Estate Company, we would like to submit our comments on the Draft Supplemental Environmental Impact Statement (DSEIS) issued by your Division for the third draft of King County's proposed General Development Guide (GDG).

Unfortunately, all too many of the comments contained in my letter to you of September 30, 1981, regarding the Draft EIS for the second draft of the GDG, are applicable to the DSEIS for the third draft, as well. We believe the document, as well as the proposed GDG itself, suffers from an overall failure to identify the logical consequences of the policies contained in the proposed Guide. In particular, the failure of the GDG, and consequently the DSEIS, to discuss and analyze the implementing ordinances necessary to effectuate the policies of the Guide hampers our response to the broad-brush policy statements and predictions contained in the documents.

There is consequently a real need for a much more detailed analysis, in order to aid both the decisionmakers and the public in coming to reasoned conclusions regarding the advisability of the Guide's policies. Certainly, we recognize that it is often difficult in a non-project EIS to analyze every consequence. However, the wholesale absence of any discussion regarding the practical implementation of broadly-stated GDG policies to actual land use situations reduces the ability of those reviewing the documents to understand exactly what the likely impacts of the GDG will be.

We therefore recommend that both the GDG and the DSEIS be revised significantly, in order to include a great deal

more substantiating data to justify the various policies proposed. For example, in the summary of impacts, you conclude on page 22 of the DSEIS that the policies of the GDG are expected to influence where new population growth is located but not to influence growth rate or total size. We are skeptical of statements such as these, since we believe implementation of the Urban and Rural Policies will significantly increase the cost of land in certain portions of the County, will result in increased development costs, and will consequently reduce the availability of affordable housing for a great many King County residents. It therefore follows that the reduced availability of affordable housing could significantly impact the rate of growth in the County. Reasonable possibilities such as these should be included in the DSEIS analysis of the Guide's policies. We simply do not agree that, as noted on page 23, the intended effect of the Guide's policies would be an effortless relocation of growth capacity, with no significant adverse impact on both the housing industry and housing consumers.

A further example of the lack of necessary and pertinent data is reflected in the tables summarizing development activity in King County, on pages 58 through 61 of the DSEIS. These tables, while interesting, are not useful in assisting the analysis of what the growth rates are likely to be with respect to future housing lots, if the proposed GDG policies are adopted. Past history, as summarized in these tables, is of little help in evaluating future impacts, since that development activity was based on the policies of the 1964 Comprehensive Plan, a very different set of planning policies from those contained in the GDG. Again, on page 61, one finds the statement that the proposed GDG is intended to affect the location and density of residential development, but not the size or number of households. That may be the intention, but how do you know that that will indeed be the outcome? Given the inescapable fact that the Guide will effectively put a premium on land located in certain Urban areas of the County, while lowering the development value of land contained in the Rural areas, should there not be an analysis of whether the number of households locating in various areas of the County can be expected to vary significantly?

The GDG and the DSEIS put a great deal of emphasis on the role of infill in the mature suburbs as an integral component of the County's growth management strategy. There are assumptions, implicit in policies such as R-103 and PI-302, and reflected in the DSEIS on pages 40 through 43, that certain community planning areas contained within the Urban area, as well as the mature suburbs in incorporated cities, will absorb growth at densities of seven to eight dwelling units per acre, or higher. We challenge the

realism of this assumption. Existing single-family residential densities in the developing community plan areas are on the whole no denser than four dwelling units to the acre. Densities in the incorporated areas are also within this three to four dwelling-unit-per-acre range. What leads you to believe that existing residents in this area will not resist as vigorously as possible attempts to double the densities in their communities? In our experience, elected officials who ultimately make land use decisions necessarily take the views of existing residents into account. Thus, community sentiment, coupled with the environmental review process mandated by SEPA, usually results in a yield of residential density significantly lower than that allowed outright by an applicable zoning code.

It is therefore reasonable to assume that even if the Guide proposes densities of seven to eight dwelling units per acre in certain areas, the actual gross residential yield per acre will be more in the neighborhood of four units per acre. Hence, we do not believe that the designated community plan areas, as well as the mature incorporated suburbs, will in fact absorb their "fair share" of forecasted growth. Nor is the present infrastructure in existing incorporated areas, such as Seattle, adequate to support development at a seven to eight dwelling-unit-per-acre density. Roads and streets, sewer and water facilities, and other facilities are increasingly in need of upgrading and repair in existing incorporated areas; yet an essential underpinning of the GDG growth management strategy is an infill concept which will put increasing pressure on this aging infrastructure.

The dubiousness of infill development as a practical growth management strategy has been assailed by many planning experts. Though the Planning Division staff has approvingly cited an October 1981 study prepared by the Real Estate Research Corporation entitled "Urban Infill: Its Potential as a Development Strategy," this study is not the last word in the evaluation of the infill concept. I commend to your attention the article by Deborah L. Brett, entitled "Assessing the Feasibility of Infill Development," which appeared in the April 1982 issue of Urban Land. That article was based on detailed case studies of three diverse metropolitan counties, one of which was the Seattle/King County, Washington, area. The article notes that the much-touted available infrastructure was often inadequate. "While the majority of sites could be developed without difficulty, there were land-locked parcels that did not have direct road access (15 percent of the sampled sites in King County) and sites with undersized water lines and old sewers." Brett, April 1982, Urban Land, at 4. The article pays great attention, as the proposed GDG and DSEIS do not, to the cost of infill housing and how it might compare with similar housing at the urban fringe. Per-unit land prices

were found to be as much as fifteen times higher in infill locations, especially in the mature suburbs. Brett at 5. The study concludes that in two of the three case studies (and including the Seattle/King County area), the residential infill land supply probably could not accommodate ten years' worth of housing demand after discounting the properties that have environmental problems, market problems, and unwilling owners. Id.

It is articles such as these which cast great doubt on the viability of King County's proposed growth management strategy as expressed in the GDG. Without further analysis, including taking into account the financial repercussions of this development strategy, there can be no sensible evaluation of the GDG.

All thoughtful citizens involved in land use issues recognize that there is an increasing problem of scarce County resources. For example, King County's ability to finance much-needed road improvements has been severely limited in recent years. Many of the major arterials in King County stand in need of significant improvement. Yet there are not sufficient funds to undertake these improvements. Given the scarcity of County resources, is it advisable to undertake a growth management strategy which will put even greater pressure on existing roads, sewers, and other elements of the urban infrastructure?

We would suggest that greater attention be given to the idea of locating new towns or villages in various areas of the County. The Bear Creek Plateau, for example, is recognized in Policy 15 of the adopted Bear Creek Community Plan as an ideal site for the location of a new town or village. There is scant attention given to this concept in the GDG, aside from policy PI-206. No thoughtful analysis has been made of the major role such new towns or villages can have in absorbing a significant portion of the growth pressure that King County will sustain over the next decades. Such new towns and villages would take much of the pressure off existing cities and suburban areas, while still affording King County the opportunity to preserve significant open space areas throughout King County.

Because of the failure of the GDG and the DSEIS to support the planning assumptions set forth in the Guide with defensible data, and because of the serious questions we have about the viability of several of the growth management concepts contained in the Guide, as well as the inattention given to the political, social, and financial consequences of the proposed growth management strategy, we urge you to undertake a further analysis of the GDG and to prepare a

Mr. Harold Robertson, Manager
July 13, 1984
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revised environmental impact statement that truly does meet
SEPA's mandate to analyze and consider the probable
environmental impacts of a proposed action.

Very truly yours,



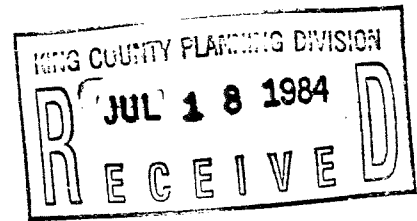
Richard R. Wilson

RRW:nlh

cc: The Quadrant Corporation
Weyerhaeuser Real Estate Company

15241 N.E. 153rd Street
Woodinville, WA 98072
July 13, 1984

Harold Robertson, Manager
King County Planning Division
710 Alaska Building
618 Second Avenue
Seattle, WA 98104



Re: General Development Guide updated EIS comments

Nearly every King County neighborhood has its share of taxpaying greenbelts, in the form of either extra lots or acreage owned by those who prefer space around them to money in their pockets. The EIS does not address the cost of replacing those private scattered greenbelts with public parks and substitute public open space. Figure 16 on page 72, which compares the cost of alternative development patterns, shows only \$189,000 more in park costs for the GDG ("Subcounty") growth pattern, than for park costs if we continue our present, unchanged ~~growth pattern~~ ("Baseline") growth pattern. The \$11,530,000 cost projected for the GDG Subcounty alternative doesn't include anything for the Cougar Mountain Regional Wildland Park which the County has already started to purchase. In fact, it barely covers the \$10,000,000 estimated fixup costs for current County parks, let alone provide for acquisition of the new public greenbelts and recreation areas that will be necessary to entertain the population under the high-density concepts of the GDG. It is further noted that Figures 17a and 17b do not include park costs at all!

The EIS Figure 16 states that public capital improvement costs are LESS under the "as is Baseline alternative, and less than 1% more under Baseline for BOTH public and private costs, than costs under the proposed GDG Subcounty alternative. (And that's with the GDG Subcounty figures including practically NO additional park expenditures, despite oft-reiterated statements on the importance of new parks and open space under the infill proposals of the GDG.) However, the KING COUNTY GROWTH MANAGEMENT BACKGROUND STUDY paper given out by staff at the recent community GDG meetings, states that "Capital improvement costs for new development in the continuing trends pattern would be 27% higher than costs for the managed growth pattern." Either the EIS or the Background Study is wrong. Which is it??

Page 77 says implementation of the GDG will reduce, "to some extent," road construction expense. Existing County rural roads must be upgraded and maintained under either alternative. (At the Carnation GDG meeting there was strong criticism of the present condition of County roads in Eastern King County.) As to feeder roads for newcomers, developers pay for those, not the public. As to roads in the infill areas which must be upgraded to handle the higher densities, it's more expensive to rebuild existing roads than it is to build new ones. (The same would be true of tearing up and replacing utility lines and mains.) And according to page 82 of the EIS, higher densities result in increased demand for freeway expansions and extensions, which of course are the most expensive roads of all and the most hated by affected residents. So I strongly question that implementation of the GDG will reduce, to ANY extent, road construction expense. Quite the contrary.

The EIS also does not address the financial impacts on property owners in outlying area designated for future urban densities, who can subdivide only under clustering rules and expensive development standards. Prospective "country lot" purchasers do not wish to commute to cluster living, and there will be little market for such lots. The EIS should describe that financial impact on property owners bluntly.

(continued)

In Figures 17a-b, the lower public costs shown for multifamily homes, compared to single-family homes, would be offset by the higher taxes per housing unit paid by single-family homeowners, and by the higher retail tax income from SF homeowners, who buy more home furnishings, lawncare and hobby equipment than MF homeowners.

Beginning on page 56 of the EIS is a discussion and tables showing how rampant is development in unincorporated King County. But no mention is made of the fact that over 50% of King County is owned by various government units, and that another about 19% is owned by Weyerhaeuser, plus what is in incorporated cities and what is un-buildable due to physical constraints, etc. So even if the owners of every vacant, buildable parcel in unincorporated King County decided to develop his property, that development would involve a very small percentage of King County, and there is no way that small percentage could make or break King County aesthetically. Furthermore, what is not mentioned here, nor in any other County discussion paper, is the fact that while schools are empty in the incorporated cities, the houses are NOT empty, so there is no abundant supply of single-family vacant homes for families with children. There should not be so much tongue-clucking over what is a natural progression of events.

Page 32 and page 34 refer to stronger policies encouraging municipal annexations in Urban Areas, but makes no mention on how to mitigate the impacts of urban densities on dissenting residents of those annexation areas who, under Guide proposals for lobbying the Legislature for changes in annexation laws, would lose present rights to fight such annexations.

The top of page 52 talks of prohibiting development on steep slopes and along lakes and streams, etc. The EIS should address the taxes lost and the deterioration in quality of new-home living lost when homes cannot be built on unobstructed-view sites or on waterfront sites where the owner is allowed to replace blackberries and alder with lawns and domestic shrubs. King County's highest single-family taxes come from such building sites. There is no reason why, with proper soil study and mitigating measures, homes can't be built on many steep slopes. And if the Sammamish River can be cleared of brush by the government, why cannot private property owners do likewise along THEIR streams??

On page 37, paragraph 5 (an Economic Development Plan) a very important criteria for the inventory of Activity Center vacant lands was omitted. Land AVAILABILITY is crucial, as a knowledge of downtown Woodinville would disclose. Most of the undeveloped land there is under the ownership of practically pioneer families with no desire to sell. Including that UNAVAILABLE land in the inventory would be very misleading.

Figure 12, page 65, residential capacities under the proposed Guide, is calculated wrong. As noted in the third paragraph on page 64, the VLI covers all land west of Range 8, plus townships 23 and 24 in Range 8, excluding Sensitive Areas and Ag Lands, but NOT excluding forest lands. Since between 14,000 and 15,000 acres of forest resource lands, in which little or no housing will be permitted, is included in the GDG residential capacity at one unit/10 acres, that means there is an overstatement of housing capacity under the GDG of between 1400 and 1500 housing units, just in that one relatively small area alone. Another factor the residential-capacities section does not recognize is that many extensive Eastside residential areas such as Reintree and Brooktrails Estates are deed-restricted to horse-acre-size lots. Country Commons on Hollywood Hill is restricted to a 2-acre minimum. Since those deed covenants supersede County zoning, the GDG residential-capacity figures are thrown off even further.

Neither the EIS nor the Guide define "long term," "large lots," "small lots." Without those definitions, comprehension is incomplete.

(continued)

July 13, 1984

The second paragraph on page 62 says that only residential comparisons were made between the "as is" pattern and the GDG proposals. It says commercial and industrial capacities were not discussed because "there is no specific employment density target for commercial and industrial development and therefore the Guide's policies for such lands cannot be quantified." That's a stunning omission from a document purporting to control our destinies and lifestyles beyond the lifetimes of a great many of us, including this writer. If the County can project population growth, it surely can project how many jobs will be necessary to support that population!

What with disparities and omissions in costs and capacities, true comparisons between the GDG and continuing "as is" cannot be made. Until the public is fully apprised of the true situation, there should be no further discussion of the GDG.

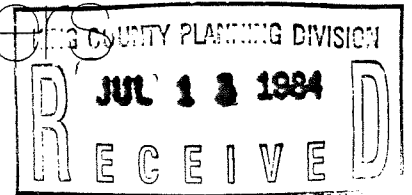
Sincerely,



Maxine Keesling (483-6565)

P.S. Whether required or not, an EIS should address a project's impact on the protection of private property rights given under the 14th Amendment to the Constitution of the United States. Since this EIS does not do that, I'll fill in. Justice Oliver Wendell Holmes, in the case of Pennsylvania Coal v. Mahon, wrote "....while property may be regulated to a certain extent, if regulation goes too far, it will be recognized as a taking....We are in danger of forgetting that a strong public desire to improve the public condition is not enough to warrant achieving the desire by a shorter cut than the constitutional way of paying for the change." And the Supreme Court, in Owen v. City of Independence, said that when it comes to constitutional rights, the government should try to err, if at all, on the side of their protection, not their impairment.

Seattle Master Builders Association



2155 - 112th Avenue N.E. · Bellevue, Washington 98004 · Telephone (206) 451-7920

July 13, 1984

Mr. Harold Robertson, Manager
King County Planning Division
710 Alaska Building
618 - 2nd Avenue
Seattle, Washington 98104

SUBJ: Comments on the Draft Supplemental Environmental Impact Statement for the
Third Draft of the Executive Proposed General Development Guide

Dear Mr. Robertson:

We are pleased to have the opportunity to comment on the Draft Supplemental Environmental Impact Statement for the Executive Proposed General Development Guide (GDG) and have the following comments:

ITEM 1 - DENSITY

Proposed average density for new single family development in selected urban areas is 7 to 8 Designated Units per acre. Page 52, "Residential Development" section.

Problem - There has been significant confusion over interpreting what this 7 to 8 unit/acre designation means. Since the density issue as it applies to existing neighborhoods and existing community plans-as well as to the potential for developing more cost effective developments-is a very major issue, it is absolutely necessary to make it very clear what this density target means.

Requested Response - The following questions need to be answered by the subject EIS:

- A. Does 7 to 8 units per acre mean per gross acre or per net acre?
If per net acre, then how is "net" acreage to be calculated?
- B. Does 7 to 8 units per acre mean that all new residential development should average out to this density, or that the entire planning area should average out to this density when fully developed, or some other interpretation?
- C. Does the Guide care how the 7 to 8 units per acre is achieved?
That is does it want to encourage developments of 7 to 8 units per acre or does it want to encourage developments of higher and lower densities whose overall average comes out at 7 to 8?



- D. Why 7 to 8 instead of some other target? Why not 6 to 7 or 8 to 9?
- E. What do we have now in our planning areas if they were fully developed under their current zoning? That is, using the answers to the above questions and applying the resultant methodology, what would our existing planning areas yield in terms of density as compared to the target 7 to 8.

Discussion - Only after the above questions are answered can one begin to evaluate the Proposed Guide's impact upon such areas as the cost of housing (i.e., in terms of providing the opportunity for economical land development) and the impact one might expect to feel and to deal with in existing communities.

ITEM 2- DATA BASE

The Guide proposes to administratively manipulate the market place for land. On Pages 61 through 66 it describes how the Annual Growth Report and its attendant data base will be used for this purpose and attempts to show the Guide's impact upon total supply of residential units. Page 31 describes the feature of the plan that would require the County staff to draw lines segregating the County into various areas (e.g. Urban area, Urban Growth Center, Rural Area). Page 33 "Residential Development" alludes to the Guide's requirement that development shall occur only after a list of criteria is met as it pertains to the level of services available to the site and to the physical features of the site itself.

Problem - By drawing the lines and by restricting development based upon the satisfaction of the list of serviceability and land form criteria, the County is setting itself up for an enormously complex responsibility. Because it must operate in a manner that does not restrict the supply and, therefore, the cost of land [p.25 Goals - "Minimize housing and land cost increases to the consumer."] the County will have to have an incredibly sophisticated land data base, demand forecasting system, and economic theory to run the market place. No such abilities have been demonstrated by the County in conjunction with the Guide proposals. The "Vacant Land Inventory" and "Annual Growth Report" do not begin to cover the necessary range of considerations.

Requested Response -

- A. Acknowledge the link between the quality of the County's data base and its ability to effectively assess and manage the supply of various categories of land.
- B. Acknowledge that land does not count as part of the "supply" until it can be developed. Derive a list of all the criteria that according to the proposed Guide, must be met by a piece of land prior to its being developable - include being "for sale." Include a discussion of how - in addition to the particular zone - platting rules can affect attainable density on a piece of land. (e.g. lot averaging rules or PUD density bonuses). Include a discussion of how necessary it may be to break demand and supply down to finer levels than we have seen to date. For example, should we stick with a single category called single family residential, or is there reason to, for example, differentiate between high density single family (7-8DU/acre)

and low density single family (1DU/acre). Since the former is associated with the provision of "affordable" housing and the latter with expensive housing, one would think this distinction, and others like it, would be very necessary to evaluate supply and demand for various types of housing products in the market place.

- C. Acknowledge the complexity of the proposed market management task required by the proposed Guide. Fully explore the consequences of failure to properly manage the market place. The potential negative impacts of failure to understand and provide for the needs of the residential (and commercial) market place under the terms of the proposed Guide are probably the most devastating potential impacts of the entire document. They have yet to be acknowledged. They not only should be acknowledged but mitigated prior to embarking on such a course.

- D. Finally, reevaluate the data base needs that will be required to administer this plan. Consider from, this data, if "over regulation" is imminent and will be detrimental to the concept and realities of affordable housing.
- ITEM 3 - RATE OF GROWTH

On Page 57 under "impacts," the EIS states that the proposed Guide is not intended to or expected to limit the rate of growth.

Problem - The rate of growth in an area will most certainly relate strongly to the quality and cost of its housing stock and to its employment opportunities. Since the proposed Guide's entire approach is to manage these areas much more comprehensively than has ever been done before, the Guide, by definition, will effect the rate of growth of our area. It may not be intended to, but it contains the possibility of having an enormous impact upon the economic health of the area.

Requested Response -

- A. Discuss the potential negative impacts upon the County's growth rate - closely linked to economic health - if any of the proposed Guide's complex regulatory provisions cannot be met or properly managed. What can be done to mitigate these potential problems which, if they did occur, could be very severe indeed?

ITEM 4 - COST OF HOUSING

On Page 25, the following goal is stated: "Minimize housing and land cost increases to the consumer."

Problem - Very little is contained in the Guide or the EIS which addresses this issue. Many of the Guide's proposed provisions, particularly their potential mismanagement (due to complexity), threaten to increase the cost of land and housing.

Requested Response -

- A. Develop a section which specifically addresses itself to the concept of land and housing costs. To do so the concept of private sector cost impacts will have to be considered. Evaluate the Guide's various proposals in light of their potential impact upon these costs. Determine how negative impacts can be mitigated.

ITEM 5 - ALTERNATIVES

Page 54, "Alternatives" - Only two alternatives are offered here. Adopt the proposed Guide with or without modifications or keep the existing Comprehensive Plan.

Requested Response

- A. Discuss the possibility of amending the existing Comprehensive Plan as a viable alternative to developing a totally new Guide.

Discussion - Much of the concern over the proposed Guide centers around the fact that it proposes sweeping changes all at once and, at the same time, offers almost no concrete information on how any of this is to be accomplished. Implementation studies, plans and programs are supposed to be developed at a later date.

Why would it not make sense to tackle the issues one at a time or in logical groups in an in-depth manner - including development of implementation programs and a detailed look at impacts? Such programs could then be implemented by amending the existing comprehensive plan whenever such a program was ready to implement.

ITEM 6 - IMPLEMENTATION

Problem - In general, the lack of sound implementation information is probably the biggest weakness of the proposed Guide and the Supplemental EIS. How can anyone evaluate the potential impacts of these documents without first knowing more about just how the County intends to implement these programs? To simply say that we intend for the Guide to accomplish this or that doesn't shed light on whether or not we as a community have the ability to make those things happen.

Requested Response - Develop implementation plans that address the following at a minimum:

- A. How will the cooperation of incorporated cities be guaranteed?
- B. What will be the County's obligation in terms of providing facilities and services in the Urban Growth areas? What dollar amounts will be tied to this obligation? Can the County come up with the necessary funds? To what extent is it obligated to do so? What happens if it does not?

- C. What data base requirements will be required to support this plan? How much will it cost? Is it funded? Is it feasible?
- D. Develop the parks and open space plan in advance of passing the Guide so that the impacts upon private land may be seen and discussed by the public.
- E. If zoning, platting and development standard code changes need to be made, prepare the complete set of changes for discussion and passage concurrent with the Guide.
- F. Prepare an analysis of the existing infrastructure's capability to handle the Guide's proposed land use patterns in infill areas. Evaluate target densities and the location of targeted areas for development in light of these findings.

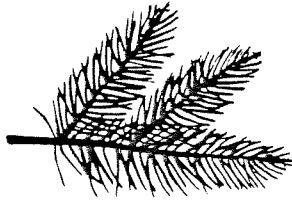
The Seattle Master Builders appreciate the opportunity to comment on the Draft Supplemental EIS on the third draft of the Executive Proposed General Development Guide.

Sincerely,



Fred Burnstead
President

FB/sy



July 12, 1984

Mr. Harold Robertson, Manager
King County Planning Division
816 Alaska Building
618 Second Avenue
Seattle, Washington 98104

Dear Mr. Robertson:

The Washington Forest Protection Association would like to provide the following comments on the draft supplemental environmental impact statement for the executive proposed General Development Guide.

1. Utilization of the "supplemental" environmental impact statement procedure as employed, is highly inappropriate given the circumstances. The 1981 draft EIS circulated on the second draft General Development Guide is out of print and generally unavailable for wide public distribution. As drafted, it is virtually impossible to analyze the proposal's environmental impacts without a copy of the 1981 draft EIS (now three years old) and the numerous "outside" references alluded to in the document. The second draft of the General Development Guide was substantially different from that of the current proposal, including the potential adverse impacts on the physical environment which have been completely excluded from analysis in the supplemental EIS.


The public has not been afforded the opportunity to read and analyze a clear, concise and comprehensive analysis of the potential adverse impacts to the natural and human environment associated with the potential adoption of the executive proposed General Development Guide. A full draft EIS on the proposal, including elements of the natural environment, should be prepared and circulated.

2. The third draft of the Development Guide contains new policies and regulatory mandates associated with forest management and shoreline areas, which represent new endeavors on the county's behalf. The proposed policies have far-reaching implications in the modification of both flora and fauna communities, species diversity, wildland fire danger, soil resources and the potential for insect and pathogen outbreaks. None of these implications were analyzed in the supplemental EIS, as all elements of the natural environment were precluded from consideration. Further, none of these considerations could have been considered in the 1981 draft EIS (we have yet to obtain a copy) since the policies in question represent new areas of administrative interpretation and proposal.

3. The supplemental document, in those areas that have been considered, is drafted in a highly conjectural manner. "Hard" analysis in the document is lacking with virtually no supporting data or analytical presence. We have never known King County to accept a conjectural or opinion based environmental analysis from private sector project sponsors, and we wonder why the county has assumed that it is appropriate to lower its standards on a proposal of this magnitude which will have long-term and far-reaching impacts on the environment.

The public is entitled to an environmental analysis which includes for public scrutiny the supporting data, analysis and assumptions which comprise the conclusions of the environmental analysis. That information has not been included in the draft document. We would suggest that the county contract with one of the many qualified environmental analysis firms for the preparation of an adequate document.

Warm regards,



Donald Chance
Director of Land Use

jn

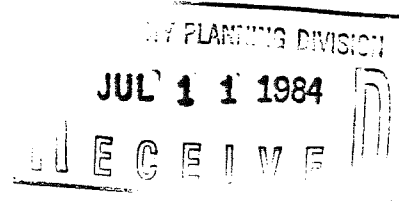


Weyerhaeuser Real Estate Company

Tacoma, Washington 98477
(206) 924-2345

July 10, 1984

Mr. Harold Robertson
Manager, Planning Division
King County Department of
Planning and Community Development
710 Alaska Building
618 Second Avenue
Seattle WA 98104



Dear Mr. Robertson:

Re: DEIS-King County General Development Guide

The following is Weyerhaeuser Real Estate Company's specific comments to the DEIS-King County General Development Guide.

Page 22, Item A2 - Initial Implementation

The DEIS should present the alternative actions that are possible if, in fact, the top five priority actions for implementation of the General Development Guide are not completed in an early timeframe. Since implementation is the key to the General Development Guide policies, the five priority actions should be incorporated as part of the GDG before passage of the policy document.

Page 23, Item B2b, Second Paragraph

Statement is made that the proposed action would not significantly raise or lower the total capacity of King County to accommodate growth on vacant lands. How is this statement supported? Who's opinion and from what studies is it derived from?

Page 23, Item B2c - Public Facilities

First sentence makes a statement that the GDG policies will save in public facility costs. How is this statement quantified? Who's opinion and from what studies is it taken?

The last sentence in the same paragraph states that "Studies indicate that total cost savings are marginal in the short run and are overshadowed by existing and ongoing capital improvement needs."

The DEIS should explain how much this plan will save the public in capital improvement costs. Support these numbers from published studies not author opinion.

Page 25 Item B

Statement is made that the council motion 4152 emphasizes that housing and land cost increases should be minimized. The DEIS should include some of the recent studies of metropolitan areas in the United States that show that a restriction in land supply increases housing and land costs to the consumer. Explain how the proposed GDG will run counter to these other statistical studies.

Page 27, Item 1 - Plan Concept (Chapter 11)

Chapter 11 defines the four major land use designations. Open space should be detailed in an organized plan as part of the General Development Guide at adoption, not implemented after the GDG is passed.

Page 31, Paragraph 1

The guide calls for standards to define adequate facilities and services differently for urban and rural areas. Identify the different standards for the urban and rural areas now as part of the GDG process and not after adoption.

Page 31 - Fourth Paragraph - Beginning third, in urban areas . . .

It speaks about limiting developing to near-rural levels until these areas have new land use plans. Define what you mean by near-rural levels.

Page 31, Paragraph 5 - Beginning the growth and development pattern . . .

The paragraph states that the guide's plan map applies the concepts to specific geographic areas in King County, whereas the existing plan concept map is abstract. What specific criteria has been used to identify specific geographic areas in King County? In other words, what criteria was used and how was it evaluated to identify the rural and resource land areas, and the urban and rural line as shown on the GDG map.

Page 32, Paragraph 1 states that farmlands, forests, mineral deposits are separated out of the rural areas

The DEIS needs to explain that the mineral deposits currently being utilized are located in the urban or rural areas. Since transportation is a major cost of gravel and concrete aggregate, mineral extraction should be approved for urban and rural locations and not just in the resource area. If resource lands are the only ones where mining activity will be allowed, the extra cost of transportation needs to be identified and its economic impact explained in the DEIS.

Page 32, Item 2 - Planning and Implementation

The DEIS needs to describe the economic effect on King County if planning and implementation does not occur as staff suggests. Since infill is a key point of the

Mr. Harold Robertson
July 10, 1984
Page 3

GDG, if the cities do not take their fair share, explain how the General Development Guide will function and the economic impact on housing costs.

Page 34, Paragraph 1 speaks to Activity Centers and the expansion of existing centers over the establishment of new centers

Explain why the 1964 plan, which has a policy that encourages diversification of economic activity in all of King County is now wrong. Explain why the GDG which restricts the rural towns to mainly resource economic activities is superior to the 1964 policy.

Page 34, Paragraph 2

Identify the time period for development of the Economic Development Functional Plan.

Page 34, Item 6 - Resource Lands

Explain how a resource company can change the use of forest lands if they no longer meet the economic criteria for resource management. Also identify the necessary evaluations studies needed to designate significant mineral resources by King County. Explain why a 80-acre minimum lot size has been designated for forest lands in the GDG. What is the criteria and rationale for this large parcel designation?

Page 34, Item 7 - Facilities and Services

Define the standards of adequate facilities and services to allow for planned growth. Also define the difference in expected standards for urban areas and rural areas.

Page 35, Item C1 - Implementing the Guide's Major Land Use Designations

Identify the urban areas where there is excess capacity to accept a seven to eight dwelling units per acre density. These growth areas should be mapped and identified before adoption of the GDG, not at a later date.

Page 36 - Item 2 - Preparing an Open Space Plan

Describe when this open space plan will be developed and explain why it should not be incorporated with the General Development Guide for adoption now.

Page 37 - Paragraph 1

Explain what happens if the cities decide not to annex more areas for growth. Also explain who has control of annexations - the cities or King County.

Page 37, Item 6 - Other Implementing Measures

Paragraph suggests that there will be changes in the subdivision and short subdivision codes and new residential road standards. These changes need to be provided now when the policies of the GDG are being considered, not after adoption of the GDG. Explain the economic impact of these changes to the consumers.

Page 40, Middle of the Page

"The guide assumes that opportunities for energy conservation and higher densities in urban areas in response to market demand will help provide affordable housing and accommodate growth while controlling public service costs." It also assumes that a stronger combination of regulations and incentives is needed to retain rural area, resource lands and open space in King County. Please identify the rationale for these assumptions. What studies were used to quantify these statements? Provide some economic analysis in support of these assumptions?

Page 42 - Impacts on Existing Community Plans

Explain who will have the responsibility for modifying community plans. Will the King County Council require that community plans have annual updates as part of this GDG process? Who has the burden of proof to ensure that community plans meet the planning policies of the GDG?

Throughout the discussion of the GDG, it is apparent that King County is making the assumption that the comprehensive plan will be the legal basis for land development and growth in King County. This is contrary to state law which mandates that the zoning code is the legal responsibility for land development. Does King County intend to change state law to require comprehensive plans to take precedent over zoning codes such as in the state of Oregon? If so, how does King County intend to change state law and what will be the significance of this request to citizens in King County and the state of Washington?

Page 52 - Residential Development

"The design policies encourage clustering," but there is no bonus credit given for the clustering requests. There needs to be some explanation of why bonus credits are not utilized to encourage more modern land development techniques in all parts of King County.

Page 52 - Commercial and Industrial Development

Describe why there needs to be different commercial and industrial zones in urban areas and rural towns. Is it in the public interest to require rural towns to have less economic vitality than urban Activity Centers?

Page 53 - Resource Lands

Describe the criteria that was used to increase the density from 1 acre to 80 acres in the forest zone. How was 80 acres derived and what was the rationale for this parcel size? Also, what is the rationale for the 35 and 15 acre agricultural parcel size?

Page 53, Paragraph 2 - Other Regulations

Describe all proposed changes to the short subdivision ordinance as part of the GDG. This evaluation is necessary so that the effect of subdivision ordinance changes can be related to an economic impact on King County citizens.

Page 54, Top of Page

Paragraph speaks about road standards. Describe what specific road standards are proposed for various uses and densities served. Also describe the commercial and industrial access street standards as part of this DEIS. Describe the effect of lower surface standards for private roads in rural areas and how King County will maintain existing roadway systems for current residents. Current residents will be anxious to maintain their current road standards and if King County is proposing to change these maintenance programs in rural areas, the citizens should be informed of this change so that it can be evaluated from a consumer's point of view.

Page 58, Figure 4

The text refers to 15,209 new residential units authorized by building permits since 1980, although the figure for table shows that there were only 13,572. Which is correct?

Page 59, Figure 7 & Page 61, Figure 9

Indicates the acreage involved in formal platting and short platting in King County since 1981. There needs to be a discussion of why more acreage was involved in short platting than in formal platting. What is the reason for the markets use of short plats in relation to formal plats?

Page 62 - Impacts of the Proposed Guide

It states that there is a 60 year supply of land in the unincorporated area. Explain where this statistic was obtained from. How is the statistic supported? Many people in the development industry do not believe the statistic and it needs to be proven.

Page 62 - First Full Paragraph

Paragraph speaks to the direct effect on city land use policies. The GDG's potential impacts on housing population within the cities is not discussed and yet it

Mr. Harold Robertson
July 10, 1984
Page 6

assumes that the cities are to accept greater density. Explain why impacts on city density capacity is not relevant.

Pages 66 - 94

These pages outline the cost of infrastructure and public facilities and services in unincorporated King County. There is a tremendous need to upgrade the existing facilities at a staggering capital improvement requirement. How does King County propose to pay for these improvements? Which is the suggested alternative to accomplish the public facility goals?

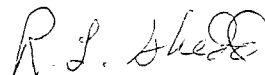
Pages 95 - 108

There are several alternatives identified to mitigate fiscal impacts of growth, but no selected suggestion for how to solve the economic problem.

This section of the DEIS is totally inadequate from an economic analysis perspective of proposed policies and their impact on the consumer. This entire section needs to be rewritten to make it meaningful.

In my opinion, this document is written in a very arbitrary and biased manner. It does not adequately identify the assumptions used or how the writers arrived at the decisions reached. There is not an adequate evaluation of economic impacts of proposed policies. If a private developer attempted to get away with an DEIS such as this, they would be sent back to the writer's table for a much more definitive document. We feel that King County should be required to meet the same standards as the private sector and therefore suggest that this document be expanded and rewritten to meet SEPA requirements.

Very truly yours,



R. L. Shedd
Director
Land Management Department

RLS:se54/719/d10

cc: King County Council

V. COMMENTS BY PUBLIC AGENCIES

A. Comments on the Draft EIS



Post Office Box 1768 • Bellevue, Washington • 98009

September 28, 1981

Harold Robertson, Acting Manager
Planning Division
Room W-217, King County Courthouse
Seattle, WA 98104

Re: King County General Development Guide
Draft Environmental Impact Statement

Dear Mr. Robertson

Because of the major role that the King County Development Guide is intended to have in determining future land use, it is critical that the environmental impacts of the Guide are fully disclosed. The City of Bellevue appreciates the opportunity to review the draft environmental impact statement issued for the Guide and has the following comments:

Transportation and Land Use

On page 163, the DEIS states, "Since the proposed General Development Guide is predicated on accommodating population and employment growth, its adoption and implementation would neither actively limit nor stimulate growth in registered motor vehicles or travel demand in major travel corridors such as I-5 or the Lake Washington bridges". However, although the General Development Guide will not affect King County's overall growth rate, the Guide's designation of specific urban/suburban communities and growth reserve areas will determine where growth will occur. The traffic implications of the geographical application of policy (as depicted on Map 2) need to be further explored. The EIS notes on page 163 that, "some areas...can not now provide adequately for current traffic, much less increased traffic demand...without a major upgrading of the arterial system." What major corridors in King County's transportation network are currently at or near capacity and what major corridors can accommodate growth? (For instance, I-90 is underutilized east of I-405, whereas I-405 near Renton is approaching capacity. In the existing conditions section, the EIS lists the six heaviest travelled corridors, but does not relate volume to capacity.) How will growth in accordance with the currently proposed urban/suburban and growth reserve boundaries affect these major transportation links?

On page 164 the DEIS notes that the proposed Development Guide would increase transit demand in part through "location of housing near employment and shopping opportunities in existing or new urban centers." Locating housing near employment and shopping opportunities is a major premise of the Guide. However, the relationship to existing employment centers of the specific

boundaries between suburban/urban and growth reserve areas and between growth reserve and rural areas is not clear. The growth reserve areas appear to be based largely on a lack of infrastructure. Although the boundary between suburban/urban and growth reserve areas may have been designated so as to accommodate county-wide growth projections, the boundaries may not accommodate future population in a manner that on a smaller than county-wide scale most effectively minimizes commuting times, optimizes transit opportunities and least impacts the existing transportation network. This should be assessed.

Population

The population data discussed in the DEIS is county-wide data that is broken down only into data for unincorporated versus incorporated King County. Data for smaller geographical areas should be provided. Without such data it is difficult to assess the impacts of the proposed growth reserve boundaries. (Note that Bellevue questions the accuracy of PSCOG's forecasts for AAM districts south of I-90 based on current growth and trends in the City. PSCOG employment projections for the Bellevue area have consistently been too low).

Stormwater

The DEIS asserts on page 105 that "Policies NE-304 through 309 provide a basis for effective measures for controlling stormwater runoff." According to the second draft of the guide, NE-304 to NE-309 are new policies consistent with existing stormwater runoff regulations. Existing county regulations are based only on a twenty-five year storm event and are not as effective as more stringent regulations such as Bellevue's. The City of Bellevue is particularly concerned with the impacts of county stormwater runoff within drainage basins that are partially within Bellevue and/or discharge into Lake Washington or Lake Sammamish. For instance, much of the Coal Creek drainage basin is within unincorporated King County and is currently undeveloped. The level of runoff control associated with future development is critical because flooding problems already occur at Coal Creek's outfall (within the City of Bellevue). To best mitigate impacts to Coal Creek and other streams, stormwater control facilities should be based on a 100 year rather than 25 year storm event.

The 100-year standard was accepted in Bellevue based on the National Flood Insurance Program. Bellevue, as does the county in many instances, relies on the natural surface water drainage system as trunk facilities to convey stormwater to major receiving bodies (Lake Washington, Lake Sammamish, etc.). If in so doing the 100-year flood plain is increased in conveyance streams, and participation in the National Flood Insurance Program is jeopardized in important areas such as Coal Creek, May Creek and other tributaries. Therefore, King County should accept the 100-year standard for on-site drainage design and/or develop and implement a regional plan to achieve the same goal. This is of special importance when the conveyance streams drain into other jurisdictions, such as Bellevue.

Utilities

The DEIS fails to discuss how the utility infrastructure developed in growth

reserve areas relates to the infrastructure necessary once the growth reserve area is designated for urban/suburban development. Also, it is not clear in the DEIS how the growth reserve areas are to be taken into account when utility facilities are sized for urban/suburban areas. What planning time horizon is intended to guide the sizing of utility improvements?

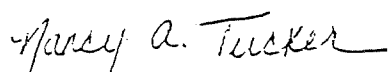
In the discussion of water utility mitigating measures the EIS states, "if overall demand for water in the region become a major issue, water resource conservation policies could be strengthened in the guide." Given the known present capacity of the Seattle Water Department (the water supplier of approximately four-fifths of King County) is demand anticipated to become a major issue?

Parks and Outdoor Recreation

The EIS discusses potential mechanisms to meet future demand for park and recreation. Other mechanisms should also be explored. In addition, measures to ensure the maintenance and operation of parks is as important as initial park acquisition and should not be overlooked.

Thank you for the opportunity to comment on the DEIS. Comments on the plan itself are being forwarded to King County from Mayor Foreman.

Sincerely



Nancy A. Tucker
Acting Environmental Coordinator

7348D/md



Municipality of Metropolitan Seattle

Exchange Bldg. • 821 Second Ave., Seattle, Washington 98104

September 29, 1981

Harold Robertson, Manager
Planning Division
W-217 King County Courthouse
Seattle, Washington 98104

Dear Mr. Robertson:

Draft Environmental Impact Statement
King County General Development Guide - Second Draft

Metro's comments on the General Development Guide (second draft), dated September 9, 1981, are hereby incorporated by reference.

Metro staff has reviewed this document and offers the following comments.

Wastewater Facilities/Water Quality

Metro supports the GDG policies regarding on-site wastewater treatment systems. The adoption of these policies is an important step toward improved on-site system performance. However, in order for this improvement to be realized the proposed policies must be implemented and an adequate operation and maintenance program established and administered by King County.

Under Section E. "Relationship to Existing Plans and Policies" the FEIS should include a discussion of the relationship of the GDG to Metro's Renton 201 Facility Plan ("Wastewater Management Plan for the Lake Washington/Green River Basins").

We wish to note the following correction to the first sentence of the third paragraph on page 190. It should read: "The Metro facility at Renton is scheduled for an increase in capacity from 36.0 mgd to 72.0 mgd by 1986..."

Policies geared toward protecting water quality appear to be adequate and comprehensive. However, a coordinated program for storm water drainage management, including enforcement of water quality ordinances, should be implemented in order for the desired effect to result. Metro recommends that the GDG also call for the implementation of a coordinated program for storm water management

Harold Robertson
DEIS/General Development Guide
September 29, 1981
Page two

which will focus in part on maintaining and improving water quality. We also wish to emphasize the importance of enforcing the Sensitive Areas Ordinance to protecting the quality of King County waters.

The following are Metro's comments on specific water quality related portions of the EIS.

Page 104, first paragraph

The underlined phrases should be added to the first sentence:

"Indiscriminate removal of vegetation, on either a small or large scale, and introduction of buildings and other impervious surfaces without adequate storm water controls, are the main causes of degradation of natural water systems in King County."

Page 105, top paragraph, second sentence

We suggest the following alternate wording:

"The cumulative impacts on water quality from new developments have occurred largely due to the County's need for financial resources to enforce existing ordinances for storm water drainage control."

Page 105, third paragraph, line 8

We recommend that the following sentence be inserted before the last sentence:

"Further impacts could be mitigated with implementation of coordinated programs for storm water drainage management (accommodated through expansion of Policy NE-330) and enforcement of storm water drainage control ordinances."

Page 106, top paragraph, last sentence

We suggest that this sentence be replaced with the following:

"The Guide should call for the implementation of a coordinated program for storm water drainage management which would generate revenues which could be used for funding continued planning and operation and maintenance of drainage control facilities."

Harold Robertson
DEIS/General Development Guide
September 29, 1981
Page three

Page 107, bottom paragraph

The following sentence should be added at the end of this paragraph:

"Enforcement of the Sensitive Areas Ordinance can protect water quality from potential impacts associated with new development occurring in these basins."

For further discussions regarding Metro's water quality comments, please contact Ms. Linda Simkanin, Water Quality Planner, at 447-5882.

Transportation

The GDG and Metro's 1990 Transit Plan are both based upon the Puget Sound Council of Governments' King Subregional Plan which encourages the concentration of development within designated activity centers. Successful implementation of the land use pattern described in the Guide is necessary for the cost-effective expansion of Metro transit services. In addition, the growth strategy which includes careful phasing of urban growth within the growth reserve areas should lower the costs of expanding transit service in the county. Large undeveloped tracts separating developed areas reduce the cost-effectiveness of transit service, which in turn reduces the amount of service that could otherwise be provided.

The FEIS should discuss the negative effect of ample parking on transit ridership. King County should give serious consideration to reducing its minimum parking requirement for new development. Furthermore, the maximum allowable parking for new developments should be well below the current minimum parking requirements. Please refer to the recently negotiated Metro/Bellevue Incentive Service Agreement, which links the number of parking spaces per square foot of commercial space to provision of additional "incentive" hours of transit service.

The following are Metro Transit's comments on specific statements made in the DEIS:

Page 43, paragraph 4

The following statement is made: "The [1990 Comprehensive Plan for Transit (1981)] is intended to provided major service improvements...throughout King County, rather than just to downtown, which was the single focus of the previous plan" (underline added). The underlined portion of this statement is incorrect, in that non-Seattle CBD activity centers have benefitted greatly under the previous plan, along with downtown Seattle.

Page 44, paragraph 2

The DEIS states that the Transit 1990 Plan did not assume any decrease in land consumption rates. This is not entirely correct. The population/employment forecasts developed by the PSCOG and utilized in the transit plan development were based on the "Policy" forecasts of the PSCOG and thus did assume a decrease in land consumption rates. However, to the extent that the GDG may further restrict the rate of land consumption, the statement is partially correct.

The DEIS quotes MetroTRANSITION background research done by Parsons Brinckerhoff Quade and Douglas and the Pushkarev and Zupin studies which relate land use densities to transit use. The implication appears to be that the GDG will in fact achieve these relationships within suburban areas which are large enough to permit the cost-effective provision of increased transit service. The majority of existing residential zoning codes would not appear to help achieve these densities and the GDG does not cite sufficient "areawide-specific" examples. However, any improvement in population/employment densities should in time be beneficial to transit (see p.133).

Page 156, paragraph 4; Page 181, paragraph 2

The DEIS states that 11% of transit trips taken by county residents are from residence to non-employment destinations. A more accurate statement would be: "About 45% of all trips made by county residents on Metro Transit are between their residences and non-employment destinations."

Page 159

The following corrections should be made to the paragraph under "Public Transit." Metro's average weekday ridership in 1980 was about 230 thousand, not 260 thousand as stated in the text. Suburban ridership in 1980 equalled 23.3% of total system ridership (not 22.3%). At this time (1981) Metro operates 64 wheelchair accessible routes.

Page 164, paragraph 2

There is a typographical error in sentence 3. Transit 1990 is intended to double ridership over 1979 levels by 1990, not 1980.

Page 207, paragraph 2

It should be noted that differences in VMT cited in the 1990 Transit Plan refer to the reduced increase in VMT if the 1990 Plan is implemented over the 1990 VMT if the

Harold Robertson
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Page five

current program is continued. In other words, while in any case total VMT will increase from 1980 to 1990, with implementation of the 1990 Plan that figure will be less. If the reduction in the 1990 Plan was assumed in the DEIS to mean that total VMT in 1990 will actually be less than in 1980, then the energy analysis in the GDG DEIS is incorrect.

Also, the final sentence in the paragraph states that the lower gasoline savings figure (11 million gallons), when offset by the increased diesel fuel consumption given in the 1990 Plan, will result in a net increase in energy consumption. This conclusion contradicts findings presented in Metro's "More Mobility for the Eighties" (Figure V-12) and the 1990 Plan DEIS (pp. III-54 through III-57).

Mr. Roger Pence, Transit Planner, is available at 447-4089 for further discussions regarding Metro Transit's comments on the DEIS.

Thank you for the opportunity to review and comment.

Very truly yours,



Rodney G. Proctor, Manager
Environmental Planning Division

RGP:shm
cc: Roger Pence
Linda Simkanin



410 West Harrison Street, P.O. Box 9863 (206) 344-7330
Seattle, Washington 98109

September 24, 1981

Mr. Harold Robertson
Acting Manager
Planning Division
Department of Planning
and Community Development
Room W217, King County
Courthouse
516 Third Avenue
Seattle, WA 98104

Dear Mr. Robertson:

King County General Development Guide

We have reviewed the draft environmental impactment statement for the King County General Development Guide and have the following comments to offer.

The documents air quality section begins with the observation that "although all regulated pollutants have been monitored in King County, the level of monitoring available is inadequate to be utilized for direct evaluation of the extent of violations from most pollutants." This comment requires a response. Air monitoring stations are located, after study, in areas where prevalence of traffic, industrial source configuration, topography, or other factors, lead to the conclusion that valuable data would be recorded at that site. Based on that monitoring, and in combination again with source, meteorological and physiographic data, general areas of violation, called nonattainment areas are designated. We believe there is adequate confirmation of the judgment that has been exercised in the location of these stations as to their ability to pin point areas of ambient air quality standard violations. The amount of ambient air monitoring could of course be increased if there were no limitations in funding, but that would not, in our judgment significantly alter structure of the designated non-attainment areas. Ambient air quality monitoring in this Agency's jurisdictional area, including King County exceeds federal requirements in 40 CFR 51, 52, 53 and 58.

The document provides good coverage of existing air quality conditions including air pollutants and their effects. The following changes however, should be made:

Page 83: It should be noted that in 1979, there were only two sulfur dioxide monitoring stations in the Green River Valley. One station reported a single violation of one of the Agency's hourly standards. No federal standards were violated. There are no non-attainment areas for sulfur dioxide in this region.

SERVING:

KING COUNTY
410 West Harrison St.
P.O. Box 9863
Seattle, 98109
(206) 344-7330

KITSAP COUNTY
Dial Operator for Toll
Free Number Zenith 8385
Bainbridge Island, 98110
Dial 344-7330

PIERCE COUNTY
213 Hess Building
Tacoma, 98402
(206) 383-5851

SNOHOMISH COUNTY
(206) 259-0288

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Mike Parker, Mayor Tacoma;
A.R. Dammkoehler, Air Pollution Control Officer

Mr. Harold Robertson
September 24, 1981
Page 2

Page 83: In the discussion of particulate sizes, the unit "mg" is incorrect. The author may mean "micrometers".

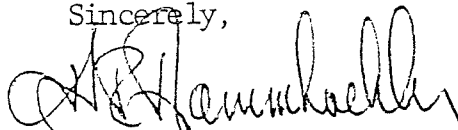
Page 84: With respect to the statement "motorized vehicles are a relatively minor source of TSP", should be noted that this applies only to tail pipe emissions. Air entrainment of dust which is derived from dried mud deposited on roads due to the movement of motor vehicles, has been found to be significant.

Page 87: Here again, your comment that "the number of monitoring stations are inadequate to account for possible special and atmospheric violations" (of CO) must be questioned. See our opening comment.

Page 87: Hydrocarbon emissions are controlled directly by this Agency's Regulation II which control the emission of volatile organic compounds which have been found to enter into photochemical reactions. This Agency and the State of Washington have rescinded their hydrocarbon standards, and the Federal Government appears to be going through a similar process.

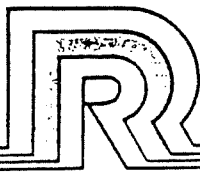
We note and commend the line of reasoning in the document which points out the need for continued efforts to maintain air quality following ambient air quality standard attainment which is projected for later in this decade. This Agency has supported the plans of the County's Subregional Councils which have generally adopted proposals to enhance existing activity centers and believe that in the long run these measures will tend to minimize air quality problems.

Sincerely,



A. R. Damkoehler
Air Pollution Control Officer

tj



October 12, 1981

Mr. Harold Robertson, Manager
King County Planning Division
Room W-217, King County Courthouse
Seattle, WA 98104

SUBJECT: King County General Development Guide and DEIS

Dear Mr. Robertson:

The City of Redmond would like to take this opportunity to respond to the King County General Development Guide and DEIS. The Planning staff, members of the City Council and I have reviewed the proposed guide, discussed it with Mary Bundy of your staff, and have identified some common concerns we would like to express.

We are pleased with the County's efforts in comprehensive land use planning and the inclusion of local jurisdictions in its decision-making. We commend the Council for the investment shown to intergovernmental coordination, and we appreciate the opportunity to respond to the proposed Development Guide. You will find a summary of our concerns attached.

Very truly yours,

CHRISTINE T. HIMES, Mayor

CW/dk

Attachment

CITY OF REDMOND RESPONSE

KING COUNTY GENERAL DEVELOPMENT GUIDE

1. The Guide encourages growth to occur in established urban/suburban communities. The DEIS projects little impact upon the County's ability to provide services because the proposed Guide does not suggest any increase in population. However, if growth is to concentrate in the established urban/suburban areas, local jurisdictions may find severe fiscal pressures in meeting service demands. The proposed Guide stated that "their (urban/suburban communities) necessary capital improvements will be a top priority" in providing public facilities and services for planned growth and, policy PL-203 states, "the quality of established urban/suburban communities should be maintained and enhanced". These are of special concern to the City of Redmond and we want to encourage active implementation of these policies.
2. One way the County can help to maintain this quality of life in the established urban/suburban communities is to secure active implementation of policies PL-302 and PL-303 in the proposed Guide. These policies speak to encouraging intergovernmental coordination and intergovernmental agreements. The City of Redmond wishes to express now its sincere commitment to working with the County in the planning process and review of project proposals, as well as establishing a forum to exchange information and resolve conflicts. The City of Redmond is currently planning a growth management program that will establish a future growth boundary and intentions for land uses within that boundary. Therefore, it is essential to the success of both plans that Redmond and King County be willing to cooperate in their planning efforts.
3. The proposed Guide encourages large parcel development in urban/suburban communities and in the growth reserve areas. One issue that has been raised is whether the growth reserve can act as an appropriate phasing tool if large developments are allowed to circumvent many of the proposed restrictions. Policy PL-405 suggests that these large parcel developments "avoid adverse impacts on established urban/suburban communities". The City of Redmond believes this to be essential if large parcel developments are going to be encouraged and we hope that steps will be taken to assess and mitigate the adverse impacts upon our City.
4. Monitoring land development activity through the County's Land Development Information System (LDIS) is key in opening up new areas for urban/suburban development in order to reduce development pressure on existing communities, so as to maintain their open spaces and natural resources.
5. On-site septic systems have been a problem in the Bear Creek Community planning area, and steps should be taken to determine soil suitability and to require strict regulation and inspections of these systems.
6. Policy EB-333 states that farmlands in the Sammamish agricultural district "should remain in large parcels that allow economical farming". Please be advised that the City of Redmond supports the County's farmland preservation activities and encourages active implementation of this policy.

7. Our fire department has expressed concern over policy CF-401 on page 238 which states that "public safety facilities such as police and fire stations should locate in designated urban centers and rural towns." As stated, this is more restrictive than current policy and zoning practice. Previously, a conditional use permit allowed fire stations in residential areas. Due to limited urban centers and rural towns, topographical restrictions, large residential areas without urban area zoning and coordination with adjoining agencies, there may be a need for fire stations in residential areas in order to provide adequate fire protection. Provisions for building fire stations within residential areas should be included in policy CF-401 of the King County General Development Guide.

MEMORANDUM

SEATTLE-KING COUNTY
DEPARTMENT OF PUBLIC HEALTH



TO: Harold Robertson, Manager
King County Community Planning Section

FROM: John Nordin, Chief *[Signature]*
Environmental Health Services Division

DATE: 9-14-81

SUBJECT: Health Department Comment on the King County
General Development Guide DEIS (Second Draft)

We have completed review of the King County General Development Guide DEIS (Second Draft). Based on the information presented and subsequent discussion with other Health Department staff, we would like to make the following comment:

Recent studies and information regarding methane gas generation and migration at existing/closed landfills have indicated this to be a significant problem and need for caution. Site testing around the country has uncovered numerous instances where methane gas had migrated off site and accumulated at explosive concentrations in adjacent residential, commercial, and industrial buildings. In addition, the production of leachate that is inherent with landfills can also pose a potential problem with adjacent land development. I have attached a partial list of methane gas emergencies that were identified in a recent landfill gas seminar sponsored by the Washington State Department of Ecology and DSHS.

Therefore, in recognition of these concerns, we would suggest the addition of language that would identify the potential problem, and recommend limitations to land/building development within at least 1500 feet of an old or existing landfill.

Thank you for the opportunity to review this plan. If you have any questions or would like additional information, please call me or Greg Bishop at 625-2125.

WS:mg
Att.

cc: Greg Bishop
Mark Mitchell, King County BALD

ENVIRONMENTAL IMPACT OF GASES FROM SOLID WASTE DISPOSAL SITES

1. Winston-Salem, North Carolina (September 1969) - methane migrated from an adjacent dump to the basement of an armory where it exploded when a cigarette was lit, killing 3 men and seriously injuring 5 others.
2. Atlanta, Georgia (December 1967) - methane gas from decaying wastes in an adjacent landfill concentrated in the sealed basement of a single story recreation center building (90 ft. X 40 ft. with 50 ft. X 30 ft. addition); a lighted cigarette caused the methane to explode killing 2 workmen, seriously injuring 2 others, causing minor injuries to 4 others, and completely demolishing the building.
3. Montreal Canada (1968) - methane gas from a dump ripped apart a swimming pool under construction near the EXPO 67 site; a parking lot built on top of the dump had lamps designed to allow the gas to escape into the air.
4. Rockford Illinois (1966-67) - methane gas from the Peoples Avenue Landfill migrated to the basement of the Quaker Oats Company production plant necessitating the development of vents to prevent methane to accumulate (methane seeping into the basement would support a flame).
5. Southeast Oakland County, Michigan (1974-75) - methane from a landfill operated by the Southeast Oakland County Incinerator Authority (SOCIA) migrated to nearby homes and accumulated to explosive levels, necessitating the development of a gravel filled trench at the landfill perimeter to enable the gas to vent.
6. Richmond, Virginia (1975) - An apartment next to a landfill exploded as a result of methane accumulations (January 8, 1975). The door and two windows in the living room were blown out, and a woman suffered first degree burns of her hands, while her husband's hair was singed. A subsequent chain of two elementary schools built on landfills showed hazardous concentrations of methane gas and resulted in closure of these schools. About 1000 families living near the landfills were also threatened, but only one was found to have methane concentrations. All home, however, were advised to keep their windows and closet doors open year-round.
7. Louisville, Kentucky (1975) - explosive concentrations of methane in homes near a landfill resulted in the evacuation of 8 families until appropriate venting could be developed.
8. Baltimore County, Maryland - small flash fires at a transfer station construction site resulted from gases from a nearby landfill.
9. Hopkins, Minnesota - explosive concentrations of methane gas from the Hopkins Landfill accumulated in and threatened nearby condominiums and apartments.

10. Anne Arrundel County, Maryland (1975 or 76) - gases from the old Schmuck (?) Dump injured 5 persons, resulting in 4 days hospitalization for two of them.
11. Philadelphia, Pennsylvania - section of the city built on old landfill caused venting problems for homes.
12. Palos Verdes Landfill (L.A. Sanitation Districts) California - major expenditures to prevent migration of gases to adjacent homes.
13. Sheldon-Arletta Landfill (City of L.A.) California - major expenditures to prevent migration of gases to adjacent homes.
14. Shelbyville, Indiana (1976) - incinerator built on landfill is getting explosive concentrations of methane.
15. Sheridan, Colorado (1975) - An explosion occurred in a drainage pipe under construction. The explosion was caused by methane gas from a landfill, ignited by a welding torch. One workman was burned and another injured by flying debris.
16. Sheridan, Colorado (1975) - An explosion occurred in a storm drain pipe that ran through a landfill. The explosion occurred when several children in the storm sewer lit a candle. The resultant explosion burned four of the boys seriously resulting in extensive hospitalization.
17. Commerce City, Colorado (1977) - an explosion occurred in a tunnel being drilled under a railroad right-of-way. The explosion was caused when a worker lit a cigarette which touched off the explosion. j Both of the workmen were killed and four firement were injured.

ASPHYXIATIONS

1. Springfield, Missouri (1973) - a man, working in a shed on a landfill, died as a result of asphyxiation by carbon monoxide produced by decomposing wasdtes; several other employees became ill.
2. Vancouver, British Columbia - two men working in a manhole died from asphyxiation from gases from a landfill.

What complicates the issue is that methane and its associated components are not predictable and are site specific due to geological conditions, landfill operation and other environmental variables. In addition to its unpredictability in production, the gases' migration and movement can change without warning to create a hazardous situation following Murphy's Law.

EIS

DIVISIONS
Light
Water
Belt Line

Please address reply to:
City of Tacoma
Department of Public Utilities
P. O. Box 11007
Tacoma, Washington 98411
(206) 383-2471

Attention:



City of Tacoma WASHINGTON

DEPARTMENT OF PUBLIC UTILITIES
Paul J. Nolan, Director

September 18, 1981

Mr. Harold Robertson, Planning Division Manager
King County Dept. of Planning and Community Development
W217 King County Courthouse
516 3rd Avenue
Seattle, WA 98104

Dear Mr. Robertson:

We have reviewed the Draft EIS of the proposed General Development Guide, and offer the following comments:

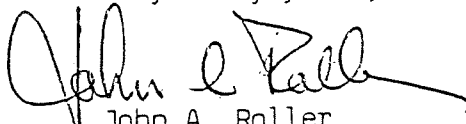
PAGE 95: Although recreational access is allowed by the United States on federal lands within Tacoma's watershed, it should be pointed out that most of the federal land is surrounded by other land on which access is not allowed. This effectively prevents most of the federal land from being used recreationally.

PAGE 103, FIRST PARAGRAPH: More recent studies have been conducted which contradict Lee's study of limited public access to watersheds. Lee's study dealt with viral contamination of the water supply. Since 1970, serious concerns have been raised about protozoan contamination, and the transmission of diseases such as Giardiasis. The protozoan which causes this disease is presently found in many of the public waters of the State that are open to public access.

PAGES 104-105: The EIS does not recognize the anticipated water supply shortage in South King County, nor does it mention Tacoma's proposed Pipeline No. 5, which will, if constructed, help alleviate this problem.

Thank you for providing us with the opportunity to comment on the EIS.

Very truly yours,


John A. Roller
Superintendent
Water Division



United States
Department of
Agriculture

Forest
Service

Mt. Baker-Snoqualmie
National Forest

1022 First Avenue
Seattle, WA 98104

1950

Reply to:

Date:

SEP 15 1981

Harold Robertson, Acting Manager
Planning Division
King Co. Dept. of Planning
and Community Development
W217 King County Courthouse
516 - 3rd Avenue
Seattle, WA 98104

Dear Mr. Robertson:

We received the second draft of the King County General Development Guide Draft EIS and have no comments at this time.

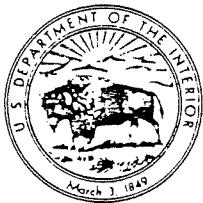
Thank you for the opportunity to review this clearly written document.

Sincerely,

J. D. MAC WILLIAMS
Forest Supervisor

1:11 -- SEP 9





United States Department of the Interior

NATIONAL PARK SERVICE

Pacific Northwest Region
Westin Building, Room 1920
2001 Sixth Avenue
Seattle, Washington 98121

IN REPLY REFER TO:

1202-03
King Co. General
Development Guide

SEP 28 1981

Harold Robertson, Acting Manager
King County Planning Division
State of Washington
W217 King County Courthouse
516 3rd Avenue
Seattle, WA 98104

Dear Mr. Robertson:

In response to your request dated August 14, 1981, we have reviewed the Draft Environmental Impact Statement for the King County General Development Guide, Second Draft and have the following comments.

Impact to Units of the National Park System

No existing or potential unit of the National Park System will be affected either directly or indirectly by the proposed action.

Recreation

The County has identified the need to acquire more park land, given the fact that the overall population continues to grow. Funding of park land appears to be of major concern and several alternatives are presented in the DES.

The fee-in-lieu of land dedication concept has been successful throughout the county and may be an alternative which should be given priority attention.

Cultural Resources

The study indicates that the County has already taken the necessary steps to insure the protection of its rich heritage. It is hoped that this effort will continue in the future.

These comments are provided as technical assistance and reflect the opinion of this regional office and do not necessarily represent the view of the Secretary of the Interior.

Thank you for the opportunity to review the DES.

Sincerely yours,

Richard L. Winters
Acting Associate Regional Director,
External Services



DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
NORTHWEST REGION
FAA BUILDING KING COUNTY INT'L AIRPORT
SEATTLE, WASHINGTON 98108

September 28, 1981

Mr. Harold Robertson, Acting Manager
King County Planning Division
W217 King County Courthouse
516 3rd Avenue
Seattle, WA 98104

Dear Mr. Robertson:

We have reviewed the second draft of the King County General Development Guide, particularly Chapter VII, Transportation. Our review comments follow.

- a. Pages 171-173: These pages cover the chapter introduction as well as the general policies on transportation. Although other modes of transportation are specifically mentioned, air transportation is not. Perhaps this is an oversight. In any event, we believe a concise statement on general policy pertaining to air transportation would be very helpful to all concerned.
- b. Page 193: The second paragraph mentions that "smaller commuter carriers provide service via smaller planes, seaplanes and helicopters to several King County locations." In this case, the term "charter operator" should be used rather than "commuter carriers." Where are the several King County locations served by these operators?
- c. Policy T-601: The note in the left-hand column states that this "...specifically designates Sea-Tac and Boeing Field as the only locations where it can be applied." Renton Municipal Airport would also meet the definition of the airport category given in this policy.
- d. Policy T-602: It should be noted that determinations involving airspace requirements are covered under Federal Aviation Regulations, Part 157, and these determinations are made by the FAA.
- e. Policy T-603: We recommend that a definition of airport approach zones be given. The clear zones should be kept clear of buildings, trees, and other similar obstructions. Otherwise, the approach areas can be put in uses compatible with airport operations which we feel include agriculture, playgrounds, parks (types which do not generate assemblies), automobile parking, industry (types which do not create smoke or electronic inference), and similar uses. As far as the "approach zone orientation" is concerned, the primary consideration involves aeronautical requirements such as prevailing wind direction as well as other aviation safety factors and these should be reflected in the policy statement itself.

- f. Policy T-604: It should be noted that this policy would in effect eliminate any feasible sites for a new general aviation airport facility in King County based on the results of the Eastside Aviation Study completed in 1978. In that study, all of the possible airport sites identified in the growth reserve area were eliminated for various reasons from further detailed evaluation. All of the final recommended sites in that study are located in the rural area.

This policy states that general utility airports should not be located in rural areas. The reason given is that airports attract additional development. A general utility airport would not necessarily attract such development, especially if prevented by appropriate land use controls and zoning in the airport vicinity.

Finally, this policy reflects the view that the "best spot" for a new airport would be in the growth reserve, where it could form a nucleus for compatible light industrial uses in a future urban center. We believe that the other side of this issue is that perhaps possible areas for future urban centers with compatible uses could be identified in the growth reserve first and then consideration could be given to siting a new airport in terms of integrating it into an overall development plan in such a center. In this regard, has King County identified any future urban centers in the growth reserve area (perhaps through the community planning process), regardless of whether or not a new airport was considered in the process? If so, we would like to have such information reflected in the General Development Guide Plan Map. We feel this is important since a rather extensive area would be required if it is determined that a new airport should be developed in conjunction with a new urban center with compatible light industries in accordance with the views reflected in Policy T-604.

- g. Policy T-605: It should be clearly noted that if federal funds from FAA are involved in the development of an airport, such development should conform to current FAA airport design criteria and dimensional standards. The minimum amount of the land required for a general utility airport would be determined by application of these standards, but the overall acreages may vary depending on the specific situation related to any given airport proposal (e.g., terrain features of the site, land ownership patterns at the site, the amount of based-aircraft to be accommodated, etc.).

This policy mentions that use of the site should not require destruction or elimination of on-site or nearby wetlands, fish-bearing waters or other valuable environmental features. It should be understood that any such impacts would be addressed in either an environmental impact statement or a finding of no significant impact. These are covered in various federal and state laws and regulations. They also provide for application of mitigation measures if significant adverse impacts are involved.

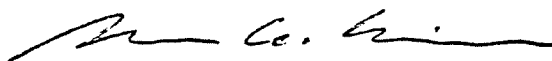
- h. Policy T-607: We concur with this policy in that it would be helpful in locating a public use airport smaller than general utility (e.g., basic utility) in the county.
- i. Policies T-608 and T-609: We assume these policies refer mainly to private heliport facilities, including those for hospitals. We feel that a policy which addresses any need for public-use, publically owned and operated heliports to serve an industrial or commercial/business center should also be included. Such centers may not have extensive buffer areas around the heliport site.

In our letter of March 28, 1980, to Councilman Bruce Laing, with copy to Mr. Jack Lynch (then Director of the King County Department of Planning and Community Development), and in subsequent correspondence, we provided comments on the First Draft, King County General Development Guide. It is not clear to us how each of our earlier comments, essentially the same as those presented above, were considered in preparing the Second Draft. As such, we would like to know how the Final Draft will document all of the formal comments received and the responses to these comments. We note that such documentation is not included in the Second Draft which we reviewed.

We have also reviewed the Draft Environmental Impact Statement (EIS) for the Second Draft, King County General Development Guide, particularly pages 164 and 165 which cover the impacts on aviation. These pages include the statement that Policies T-604 and T-605 "could have indirect (but potentially significant) positive or negative impacts on Sea-Tac and Boeing Field operations, depending on whether they helped or hindered site selection, in the event that air space conflicts at Sea-Tac and Boeing Field indicated the need for a new general aviation airport." Similarly, it should also be mentioned that these policies could have a positive or negative impact on the based-aircraft capacity situation in King County, depending on whether they help or hinder the site selection for a new general aviation airport.

Your consideration of our comments in the Final General Development Guide and Final EIS would be appreciated.

Sincerely,



Mark A. Beisse
Acting Chief, Planning and
Programming Branch, ANW-610

cc:

Joe Sims, Port of Seattle
Bill Hamilton, Washington Division of Aeronautics
Don Secrist, PSCOG

7:11 8:11

LAW OFFICES OF
JONSON, JONSON & HAMACK, P. S.
300 CENTRAL BLDG
SEATTLE, WASHINGTON 98104
(206) 624-2521

CARL A. JONSON
MICHAEL A. JONSON
KEITH H. HAMACK
ERVIN A. DE SMET, JR.

September 30, 1981

KING COUNTY EXECUTIVE

BELLEVUE OFFICE:
(BY APPOINTMENT)
224 BELLEVUE BUSINESS
CENTER BUILDING
BELLEVUE, WASH. 98004
(206) 455-5030

RECEIVED

OCT 1 1981

DEPARTMENT OF PLANNING
& COMMUNITY DEVELOPMENT

Mr. Ron Dunlap
King County Executive
King County Administration Bldg. *Connel House*
Seattle, Wash. 98104

Re: Draft II, General Development Guide and EIS Guide

Dear Mr. Dunlap:

This office represents a number of water and sewer districts and is a member of the Washington State Association of Water Districts, and has briefly reviewed the referenced document. I believe I understand what the Planning Department, King County Executive and King County Council want to accomplish with the development guide. However, the manner in which the material relating to water and sewer districts is worded leaves one with the impression that the authors have no basic understanding of the proper role of the County in respect to water and sewer districts. I am sure that is not the case, but I believe that the presentation and wording should be changed in order to eliminate erroneous impressions that could be gained from a review of the document as to those districts.

Chapter 10 covers utilities and on Page 211, the third paragraph describes the purpose to establish policies to guide the County in "regulating utility services and facilities provided by other agencies." It is beyond question that water and sewer districts are regulated by State law and rules and regulations of various State agencies. Private utilities are regulated by the Washington Utilities and Transportation Commission, R.C.W. 80.28. The State has preempted the field. The limitation on the power of the County in respect to "regulating" activities which are regulated under State law is quite well known. A recent pronouncement was in Seattle v. Auto Metal Workers, 27 Wn.App. 669, where the subject was discussed and Constitution Article XI, Para. 11, was referred to which provides that "any county, city, town or township may make and enforce within its limits all such local police, sanitary and other regulations as are not in conflict with general laws."

Under Para. 2 on Page 213, the second sentence of the second paragraph is incorrect. The approval of a Comprehensive Plan does not include "financing and the design and location of water supply and distribution facilities". The last paragraph of that section is also incorrect. State law controls withdrawal of ground water.

Para. U-205 illustrates the expressions throughout this section which creates erroneous impressions of the basis for establishment and extension of water and sewer systems. A Comprehensive Plan, simply stated, describes a method of providing service in a prescribed natural service area, if, as and when needed as the area develops, based upon sound engineering principles, depending upon the uses to which the

Mr. Ron Dunlap
King County Executive
Sept. 30, 1981
Page Two

property is put by the owner. Those uses are determined by County zoning laws. The Utility Comprehensive Plan does not purport to direct land use. The Utility Comprehensive Plan is general and is subject to change to correspond to actual use. Water and/or sewer systems will be installed only where property owners want the service and are willing to pay the cost. The Comprehensive Plan does not obligate the District to carry it out, and it will be carried out only to the extent that the property owners want it carried out and, as stated previously, are willing to pay for it. Past experience has shown that whether property owners want utility service depends upon a basic "need" for the service. Basic design standards are prescribed by State agencies through regulations, thus Counties have no authority of any kind, as to design except as fire flow requirements may affect design. The Department of Ecology and/or Department of Social and Health Services are the applicable State agencies. Water systems will be designed to meet County fire flow requirements with a view to installing facilities that will not require tearing up and replacing facilities as well as roads and streets in future years.

Para. U-206 again repeats the language which gives the inaccurate impression. It will be the property owners' ability to utilize the land that will dictate the need for a water system. If property owners want a public water system and want to pay for it, they have the Constitutional right to use existing statutory procedures in Title 57 (and Title 56 for sewer service). The County has no authority to deprive property owners of use of State statutes.

Statements in U-301 through 308 reflect the same misunderstanding as to sewer districts and planning, financing and construction of sewer systems. Property owners will neither request nor pay for sewer service until a need exists. Water District No. 108 of King County, Washington is a good example inasmuch as a sewer system exists only in the planned subdivisions of Fairwood. The District has neither sought to expand the sewer system to other areas, nor have property owners taken steps to obtain an extension of the sewer system. In that District, there are areas, particularly around lakes, where there is an obvious need for a sewer system. However, for various reasons, property owners have not seen fit to take the action to obtain sewers, and it can only be concluded that they do not want sewers and do not want to pay for them.

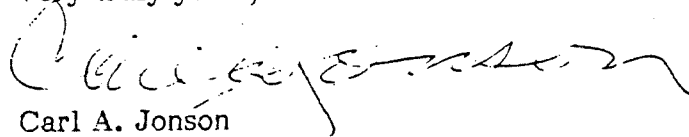
Para. U-310 sets forth the requirement of a "ten-year supply of developable land". Those involved in preparing the Guide must have to know that a given area of land may be a one-year supply, five-year supply, or a ten-year supply, depending upon economic conditions, demands for use of property, and zoning laws which permit use. The statement as made is meaningless.

In my opinion, the entire Utility Section needs to be rewritten to exclude language that purports to superimpose County authority over State law and regulations of State agencies. To the extent that the same improper expressions are carried over into other Sections, the same corrections should be made.

Mr. Ron Dunlap
King County Executive
Sept. 30, 1981
Page Three

It will be appreciated if these views will be considered along with the views of others presented in respect to the Guide.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Carl A. Jonson", written over a horizontal line.

Carl A. Jonson

CAJ/ma

cc: Washington State Association of Water Districts



STATE OF WASHINGTON
DEPARTMENT OF GAME

600 North Capitol Way, GJ-11 • Olympia, Washington 98504 • (206) 753-5700

September 28, 1981

Mr. Harold Robertson, Acting Manager
Planning Division
Room W-217, King County Courthouse
Seattle, Washington 98104

DRAFT ENVIRONMENTAL IMPACT STATEMENT:
King County General Development Guide

Mr. Robertson,

Your document was reviewed by our staff as requested; comments follow.

Your natural environment policies will be an important element of growth management in King County. If the public's fish and wildlife resources are to exist in a more densely populated county, it is essential your policies calling for protection of stream corridors and wetlands be both implemented and enforced.

However, we hope your growth strategy for designated Urban/Suburban Community Growth Reserve and Rural Areas does not allow these areas to be written off without environmental review. Migratory species need open space along their routes. Urban/suburban areas should have a system of urban wilds. For example, vegetation left along streams (riparian woodland) in an urban area serves as a wildlife corridor. If wetlands such as marshes, bogs, and swamps can be incorporated into a corridor network, their fish and wildlife value can be increased. Absence of protection has produced many examples of resources degradation. Trout and salmon that spawn in North and Swamp Creek have to travel through the Sammamish Slough. Current high water temperature in the Sammamish is limiting fish passage. Fish that spawn in the Green River system have to migrate through the Duwamish, where they are subjected to very poor water quality and predation that is caused by lack of shallow water.

Urban wilds take on considerable wildlife value; as fragmentation and development of upland forest proceed, the riparian woodland may be the last refuge. Urban wilds not only protect valuable recreational and economic resources, but they provide aesthetic and recreational value as well.

In general, we recommend at least 100 feet of vegetation be left adjacent to streams and wetlands. This is the minimum amount necessary to filter silt in stormwater runoff and preserve aquatic environment. To serve as buffers to these sensitive areas, whenever

Mr. Harold Robertson
September 28, 1981
Page Two

possible, 200 feet of vegetation should be retained. Some wildlife nesting, perching, and feeding sites would require buffers of 600 feet; for example, eagle roosts, heron rookeries, and grouse nests.

Additional comments follow on the draft.

On page 106 you state, "For example, if an entire drainage basin is urbanized, preserving a strip of vegetation along a stream may enhance an area's aesthetics but would have little effect on water quality." This may not always be the case. A northern California study on sedimentation, "Evaluation of Streamside Bufferstrips for Protecting Aquatic Organisms" by Erman, Newbold, and Roby (1977), showed that logging impacts could be detected upon aquatic insect communities when buffer strips less than 30 meters were left. However, when at least 30 meters of vegetation was left next to the stream, logging impacts could not be detected. Aquatic insects depend upon the proper ratio of organic and inorganic bottom sediments. Therefore, it appears 100-foot buffers would provide significant stream protection from the impacts of silt.

Page 107: There are many more waters of primary importance to the anadromous fish resources than you list.

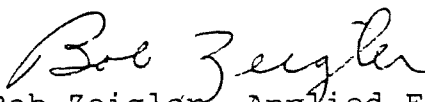
Page 117: Basin planning policies are very important. Coordinated planning efforts will be valuable for ultimate resource protection.

In summary, we are encouraged by many of your policies. We hope they are both implemented and enforced.

Thank you for sending your document. We hope you find our comments helpful.

Sincerely,

THE DEPARTMENT OF GAME


Bob Zeigler, Applied Ecologist
Environmental Affairs Program
Habitat Management Division

BZ:cv
cc: Agencies
Region



STATE OF WASHINGTON

DEPARTMENT OF TRANSPORTATION

Highway Administration Building • Olympia, Washington 98504 • (206) 753-6005

KF-01

September 15, 1981

Mr. Harold Robertson, Acting Manager
Planning Division
Room W-217, King County Courthouse
Seattle, Washington 98104

King County
General Development Guide
Second Draft
Draft Environmental Impact Statement

Dear Mr. Robertson:

We have reviewed the subject document and have the following comments:

The Department suggests that the county includes a paragraph within the public transit section on employer supplied public transportation incentives such as van/car pools and traffic system management proposals such as flex time. The Department would like to see the county start requiring the above mentioned incentives as a matter of policy for developments in high density, congested areas.

The public transit sections should also indicate that full funding of the Metro Transition Plan is not expected at this time.

As indicated in Part C of the transportation section there may be some severe adverse impacts to local roads including state highways. It should be pointed out that we may not have the funds to mitigate these impacts. Therefore, we will be looking to the respective developers through the county for the necessary funds.

If you have any questions, please call Don Hoffman, District 1 Design Engineer at 443-4356(SCAN) or 764-4163.

Sincerely,

ROBERT S. NIELSEN
Assistant Secretary for Public
Transportation and Planning

A handwritten signature in cursive script, appearing to read "Joseph Bell".

By: JOSEPH BELL, Manager
Planning Implementation and
Environmental Policy

RSN:kls
JB/WBH

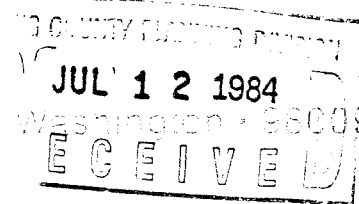
cc: J. D. Zirkle/T. R. Burke

B. Comments on the Supplemental Draft EIS

City of
Bellevue



Post Office Box 1768 • Bellevue, Washington • 98009



July 10, 1984

Mr. Harold Robertson, Manager
King County Planning Division
710 Alaska Building
618 Second Avenue
Seattle, WA. 98104

Dear Mr. Robertson

The City of Bellevue Office of Environmental Coordination and the Planning Department have reviewed the Supplemental Draft EIS on the Proposed General Development Guide. Analysis of the Draft Supplement EIS raises several questions about assumptions made by County staff. A central assumption of the Guide is that implementation will occur as a result of County/local jurisdiction cooperation. However, neither specific methods, tools or timeframes are referenced; nor is it possible to determine the specific effects on individual jurisdictions such as Bellevue.

County staff have stated in public meetings that: 1) Bellevue's population growth will not exceed the current projections of PSCOG as a result of Guide implementation, 2) The majority of growth in urban areas will occur as a result of annexation to existing jurisdictions, and 3) The Guide's implementation does not require an infill strategy or existing jurisdictions to accommodate increased population densities. However, none of these statements occur in the Draft Supplemental EIS nor are data provided at any level of detail to corroborate public statements or provide a basis for analyzing the validity of these statements.

In fact, the DSEIS is ambiguous with respect to the role of incorporated cities. For instance, the EIS notes that the land use plans for the cities and rural towns provide a mechanism for achieving consistency between the Guide and local city plans (page 39 of the DSEIS), implying that the incorporated areas should change their land use plans to be consistent with the King County General Development Guide. However, elsewhere the EIS assumes that City plans won't change. For instance, page 62 of the draft states, "The Guide would not directly affect city land use policies, so the proposal's potential impacts on capacity within cities are not discussed." In general, the impact analysis on the EIS focuses solely on unincorporated areas of King County. There are statements that it is likely some redevelopment will occur in the cities, however, it is not clear whether this redevelopment is expected to be related to the General Development Guide or occur independently of it.

The role of the incorporated cities, such as Bellevue, for the implementation of the General Development Guide and the impact to these cities needs to be

City of Bellevue offices are located at Main Street and 116th Avenue S.E.

Mr. Harold Robertson
July 10, 1984
Page 2

clarified in the FEIS. If cities are to absorb more of the growth, the impacts on cities and their capability for absorbing this growth in terms of impacts on street systems and other infrastructure need to be analyzed.

Impacts to the unincorporated areas should also be more clearly specified. If, as is suggested in the EIS, the majority of new growth should occur in the western part of the County, then the EIS should provide specific detail to demonstrate the location, levels and types of growth projected to occur. Refer also to the City of Bellevue's letter on the original Draft EIS for the General Development Guide for other comments regarding impacts of projected growth.

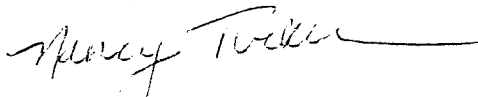
As you are aware, the City of Bellevue is refining the Newcastle Plan for the portion of the Newcastle area within Bellevue's sphere of influence. Page 43 of the Draft Supplemental EIS notes that the Newcastle Plan is not entirely consistent with the General Development Guide. County staff have indicated that the portion within the Bellevue sphere of influence would not have to be modified based on the General Development Guide. Bellevue staff would appreciate this being confirmed.

The EIS specifies funding available for street improvements in unincorporated areas of the County. What happens to these designated funds if incorporation to adjacent cities occurs prior to the implementation of the road improvements?

In conclusion, the FEIS should clarify the Guide's policy, fiscal and other impacts on the City of Bellevue. City staff looks forward to working with the County to better understand the implications of the Guide and to discuss possible implementation measures. Additionally, the City of Bellevue should be listed as an interested party for the review of the recommended funding strategy (page 95 of the Draft EIS notes this strategy is being developed).

Thank you for the opportunity to comment.

Sincerely



Nancy Tucker
Environmental Coordinator

2051J/NT/ph

cc: Scott Kirkpatrick, Assistant Planning Director
Phil Kushlan, Deputy City Manager

July 11, 1984

Harold Robertson, Manager
King County Planning Division
710 Alaska Building
618 2nd Avenue
Seattle, WA 98104

JUL 12 1984

FIVE

Dear Mr. Robertson:

Review of Executive Proposed General Development
Guide and Draft Supplemental Environmental
Impact Statement

We have reviewed the subject guide and accompanying supplemental draft environmental impact statement (DEIS). We believe that the DEIS addresses the air quality implications of the proposed guide. However, the guide does not adequately describe the air quality benefits that will occur if the policies proposed are implemented. In addition, the guide places the entire burden for air pollution control on "federal, state and regional government agencies" and fails to recognize the extremely important relationship between development policies and maintenance of air quality standards (see Guide, page 42).

Although attainment of the ambient air quality standards for carbon monoxide and ozone will occur primarily because of Federal new motor vehicle controls, the State's inspection and maintenance program and the Agency's Regulation II (for ozone); long-term maintenance of these standards depends on implementing the policies described in the guide. In particular, encouraging higher density and compact growth patterns (Guide, page 71) and infill or redevelopment (Guide, page 72) should reduce vehicle travel and accompanying emissions. Furthermore, the concepts of activity centers, community centers and neighborhood centers should facilitate transit use and reduce automobile travel.

We recommend that the guide be revised to include brief statements about air quality. A discussion of the relationship between transportation and air quality should be added to page 133. Also, page 42 should be revised to include a description of the State Implementation Plan similar to that on page 38 of the supplemental DEIS.

SERVING:

KING COUNTY
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KITSAP COUNTY
Toll Operator for Toll
Toll Number Zenith 8385
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PIERCE COUNTY
213 Hess Building
Tacoma, 98402
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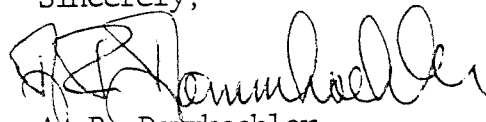
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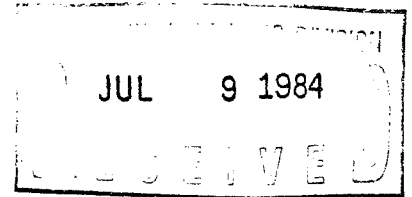
William E. Moore, Mayor Everett;
A.R. Dammkoehler, Air Pollution Control Officer

Sincerely,



A. R. Dammkoehler
Air Pollution Control Officer

kc



July 3, 1984

Harold Robertson, Manager
King County Planning Division
700 Alaska Building
618 Second Avenue
Seattle, WA 98104

SUBJECT: Executive Proposed General Development Guide - DEIS

Dear Harold:

I would like to submit the following comments:

Page 22. Initial Implementation

Although I agree that all of these items are high priority, I feel that some actions indicated in the preliminary list of implementation measures should be enacted at the time the Development Guide is adopted. I have listed these as follows:

1. Explicit processes for preparing community plan and General Development revisions. I don't believe the GDG can be adopted until these are in place and acceptable to citizens and developers.
2. Amend Zoning and Subdivision Codes to require consistency with GDG policies. This makes the GDG effective upon adoption. If not in place no one will know what applies during the interim.
3. I would also like to see the development of an Affordable Housing Policy Plan, at least at the same priority level as the Economic Development Plan.

Page 23. Housing and Land Development Activity

How would this capacity shift occur? Wouldn't it be necessary to have agreement with cities for this aspect of the plan to be implemented? It would appear that this agreement is crucial to carry out the plan concept.

Page 31, Paragraph 5. Phasing Strategy

The third strategy should be emphasized and possibly be refined to indicate how this will occur (through zoning, CIP, phasing etc.). Will public resources be concentrated in these areas to allow growth to occur once plans are adopted?

Page 32, Paragraph 5 - Municipal Annexation Policy

We encourage the strengthening of cooperative efforts with the cities to develop service areas and annexation agreements.

Page 33. Residential Development

Although urban growth areas have been established to accommodate new housing, and promote affordability, new housing in areas such as the E. Sammamish Plateau is not necessarily affordable simply because the land is available for development. Cost savings in housing in outlying area may be achieved only by transferring or deferring growth costs.

Generally, the 7-8 d.u. average density does not seem excessive. The trade-off for lower residential densities is loss of resource lands and environmentally sensitive areas. If they are valued and set aside, growth has to go somewhere else, and it is most preferable that it go where services are available in urban areas.

Page 37, Part 6. Other Implementing Measures

Since the GDG is an umbrella for both community planning and implementation, I think that the sooner implementing ordinances are standardized to be consistent with the GDG, the better.

Page 42. Impact on Community Plans

Without the guiding concept of a county-wide plan, it will be difficult to achieve regional or interjurisdictional goals, and the community plans will ultimately balkanize the County. This is a significant impact of a segmented planning process. For local communities caught between or at the edge of planning areas, severe problems can be created at the boundaries.

Page 52. Residential Densities

Large lot zoning in rural areas, although controversial, is the only way to avoid premature subdivision. The 10-acre minimum requirement is probably not even adequate to support agriculture. Areas zoned at higher densities (1 - 5 du/acre) are really transitional to semi-urban uses, since they have limited usefulness for agricultural purposes although there may be some places in rural areas where they are appropriate, particularly as transition around rural towns. However, residential zoning at suburban densities in rural areas will tend to increase speculation and land values, ultimately destroying utility of the land for agricultural uses. Providing adequate services to higher density rural areas will have significant fiscal impacts to all county residents.

Page 74, Paragraph 3

The statement that the marginal cost of facilities generally decreases as population density increases is generally supported by the fiscal impact analysis conducted by the City of Redmond in 1982 for our Growth Management Program. The fiscal impact of extending services to outlying areas before the population is there to support it is very negative.

Page 77. Streets and Roads

It appears that this analysis does not take into account streets and roads in municipal jurisdictions that may be impacted by growth in adjacent county areas. It is obvious that only a portion of the County's need can be met, let alone that of the cities, and I am unsure whether these impacts can be mitigated by the Plan. These impacts were not adequately mitigated in the East Sammamish Community Plan and we are concerned that adequate measures be adopted.

Page 87. Surface Water Management


Our concerns are similar to those mentioned in relation to streets and roads. Can the County mitigate drainage impacts of growth generated by the Plan if revenues are insufficient or uncertain? Perhaps the Plan is not restrictive enough.

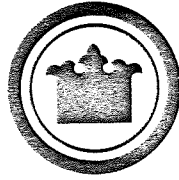
Section IV. Mitigation of Fiscal Impacts of Growth

The fragmented and inadequate system of local government funding will probably not keep up with the costs generated by growth proposed in the Plan unless there are significant changes in statutory authority, which are not likely. Although property taxes offset some portion of this impact, they generally lag behind growth and are inadequate to mitigate all off-site impacts. The long-term impact of encouraging growth without adequate funding of public facilities and services will be a loss of environmental quality and severe reductions in levels of service.

I apologize for the fact that these comments are extremely general at this stage, however, I wanted to take the opportunity to raise some issues related to certain aspects of the Plan. I will be reviewing the General Development Guide in detail with the City Council and Planning Commission, and more detailed comments will be forthcoming on the document itself.

Sincerely,


KAY L. SHOUDY, AICP
Director
Department of Planning
and Community Development



JUN 15 1984

King County Executive
Randy Revelle

Department of Planning and Community Development
Holly Miller, Director

June 14, 1984

TO: Harold Robertson, Manager, Division of Planning

FM: Joe Nagel, Manager, Division of Parks and Recreation

JN

RE: DRAFT SUPPLEMENTAL -- GENERAL DEVELOPMENT GUIDE

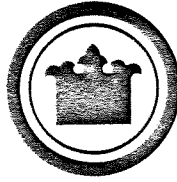
Parks has reviewed the Park and Recreation Section of the Draft and would like to take the opportunity to update our activities with respect to Park Capital Improvements.

We recently completed an in-depth review and analysis of about seventy (70) existing park sites including about one hundred and fifty (150) structures. The purpose of this work is to present a comprehensive Park Rehabilitation Plan for funding consideration in the 1985 Capital Budget.

Our 1985 budget submittal will include a request for funds to develop a New Park Acquisition and Development Plan which we expect would take about one year to accomplish.

Thank you for the opportunity to comment.

JN:BJ:dr



King County Executive
Randy Revelle

Department of Public Safety
Vernon Thomas, Sheriff-Director

MAY 23 1984

MAY 21, 1984

M E M O R A N D U M

TO: Harold Robertson, Manager
Planning Division

FM: James J. Nickle, Chief, Field Operations Division
Department of Public Safety

RE: SUPPLEMENTAL DRAFT EIS: EXECUTIVE
PROPOSED GENERAL DEVELOPMENT GUIDE

Thank you for the opportunity to review and comment on the above referenced publication. I have reviewed the document with members of my staff and concur with the content as written.

JJN/dg

KING COUNTY FIRE PROTECTION DISTRICT NO. 43

22225 S.E. 231st STREET

MAPLE VALLEY, WASHINGTON 98038

432-0200

June 8, 1984

Mr. Harold Robertson, Manager
King County Planning Division
816 Alaska Building
618 Second Avenue
Seattle, Wa. 98104

Re: Draft Supplemental E.I.S. of the proposed G.D.G.

Dear Sir:

The most outstanding item of the Supplemental E.I.S. related to Fire Protection, is the lack of projected cost differences using the four alternative development patterns. The clearest error is that the New Town scenario would require the creation of new facilities to serve these communities, whereas the same development located in existing service areas may not require new capital improvements and only marginal increases in operating expenses. Similarly, the costs of Emergency Medical Services for New Town are shown to be zero, while the other alternatives are \$486,000. The costs for Water Storage for New Town are shown as no increase over other alternatives, whereas a new water system would be necessary. Transit costs also show no increase over Baseline costs for a New Town alternative.

The notation that Baseline Costs are understated is an understatement. County libraries are shown as zero, while other alternatives are at \$2,463,000. It also makes little sense that without controls the costs of Transit, Parks, Emergency Medical Services, and Fire Protection are less than if some controls were imposed.

On the whole, the relative value of the Fiscal Impacts analysis provided is not persuasive and detracts from the apparent validity of the E.I.S.

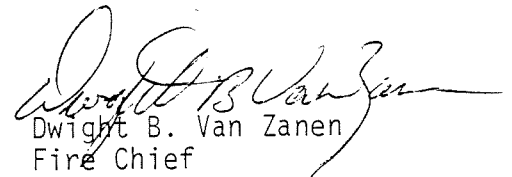
I have enclosed a copy of my May 14, 1984, letter to Ms. McCumber indicating other minor conflicts noted in the General Development Guide. Mary McCumber indicated that the conflicts may simply be based on the fact that the G.D.G. is "General", and regulations are specific.

Page two
June 8, 1984
Mr. Harold Robertson

I also enclosed a copy of my May 4, 1984, letter to Mr. Ralph Colby that illustrates a serious problem with the effects of the G.D.G. concerning water supplies. Land use planning decisions are based on complex factors, and the availability of water alone should not be the determining factor. Because of that, water should not be restricted as a land use control. All land uses benefit from the availability of water; and for fire protection purposes the density of development resulting from the zoning is indicative of the frequency of fire incidents, and has little effect upon the volume of water needed to extinguish a fire once it occurs. The exemption for lots over 35,000 sq. feet is based upon allowing the fire building to burn down without spreading to other structures. Just because water is not required, does not mean water should be prevented in rural zones. You should be warned that this is becoming a major issue for the King County Fire Chiefs and King County Fire Commissioners Associations.

Please do not misunderstand. I am in general support of the G.D.G. I am not supportive of the anomalies noted, however.

Sincerely,


Dwight B. Van Zanen
Fire Chief

DBVZ:mjh

Enclosures



Municipality of Metropolitan Seattle

Exchange Bldg. • 821 Second Ave., Seattle, Washington 98104

JUL 13 1984

RECEIVED

July 12, 1984

Harold Robertson, Manager
King County Planning Division
710 Alaska Building
618 Second Avenue
Seattle, Washington 98104

Draft Supplemental Environmental Impact Statement:
Executive Proposed General Development Guide

Dear Mr. Robertson:

Metro staff has reviewed this document in conjunction with the Executive Proposed General Development Guide (GDG). We are responding to the policies contained in the GDG in a subsequent comment letter to King County Executive Randy Revelle and hereby incorporate the content of that correspondence by reference.

In general, we find that the Draft Supplemental Environmental Impact Statement satisfactorily addresses environmental impacts relative to Metro's interests in the public transit system, wastewater treatment facilities and water quality. We offer the following comments on issues that are specific to the DEIS.

Public Transit System

Page 36, Addressing Public Facilities and Services

It is important to address the strategies that will be required to implement the draft GDG and to that end, we strongly support the development of standards for critical services. We concur that the standards should specify what level of service is appropriate for urban areas and for rural areas. Although it was not specifically stated, we assume that public transportation, like roads and sewers, is considered a critical service for which standards should be developed.

Page 38, Metro, 1990 Comprehensive Plan for Transit

As discussed in the Draft Supplemental EIS, the 1990 Plan was devised to improve transit service throughout King County. This is to be accomplished in large part by redirecting new service and facilities to serve suburban activity centers

Harold Robertson
July 12, 1984
Page Two

better. However, residential and employment densities will be critical factors in determining if Metro's new service orientation actually leads to attainment of the 1990 ridership goals. As noted in the Draft Supplemental EIS, residential densities of at least seven units per acre and employment concentrations of at least 15,000 employees at densities of 50 employees per acre constitute development thresholds that are critical to the attainment of the 1990 ridership goals. While the GDG is very supportive of transit with respect to residential densities, it lacks specificity with respect to employment markets. Although the concept of designated urban growth centers is clearly consistent with the 1990 Plan, it must be understood that increases in the employment base of designated growth criteria will not automatically create viable transit markets. Unless there is a corresponding increase in employment density, public transportation will be unable to assume a major role in serving trip demand generated by suburban activity centers.

Page 52, Commercial and Industrial Development

We would like to see the discussion of excess parking expanded. Like development densities, parking policies are a key factor in defining the transit environment. It is extremely difficult for either transit or ridesharing to compete with the auto, even in mature urban areas, if parking is both inexpensive and readily available. Therefore, parking maximums should be considered a legitimate zoning tool for directing future commercial/industrial development in designated urban growth centers.

Page 62, Housing and Development Activity, b. Impacts

The Draft Supplemental EIS acknowledges that the GDG establishes no specific employment density targets for commercial and industrial developments. We feel this lack of goal setting needs to be rectified. Although the county has no jurisdiction within the cities where most of the growth is projected to occur, we would like to see the county take a leadership role in stimulating a regional discussion on density goals for new commercial and industrial development. This process should coincide with the development of a rational and efficient annexation plan. Through this effort, local units of government, including the county and special purpose districts like Metro, can work together to identify the growth patterns within each urban growth center and to respond with appropriate levels of service.

Harold Robertson
July 12, 1984
Page Three

For further information or clarification regarding Metro's comments on transportation, please contact Transit Planner, Ellen Bevington at 447-5818.

Wastewater Treatment Facilities

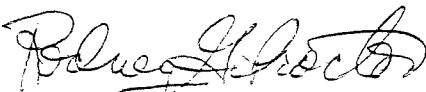
In general the Draft Supplemental EIS satisfactorily covers potential impacts to wastewater treatment facilities and impacts resulting from on-site facilities. We have only the following comments.

Page 100, Mitigation of Fiscal Impacts of Growth, 2 c. Connecting Charges:

A Metro advisory committee has developed a recommendation that Metro establish a connection charge "in an amount estimated to recover approximately 50 percent of the estimated cost of the 20-year capital improvement program" (Rate Structure Advisory Committee, 1983). The recommended charge would amount to approximately \$490 per "customer equivalent" and would increase with inflation plus 4 percent each year. (Changes or additions are underlined.) This committee's recommendation has not, as of this time, been presented to or been considered by the Metro Council. (Metro currently has no connection charge.)

Thank you for the opportunity to review and comment.

Very truly yours,



Rodney G. Proctor, Manager
Environmental Planning Division
RGP:lda



STATE OF WASHINGTON
DEPARTMENT OF GAME

600 North Capitol Way, GJ-11 • Olympia, Washington 98504 • (206) 753-5700

July 24, 1984

JUL 31 1984

Mr. Harold Robertson, Manager
King County Planning Division
710 Alaska Building
618 Second Avenue
Seattle, Washington 98104

RE: Draft Supplemental Environmental
Impact Statement and General
Development Guide, King County

Mr. Robertson,

Your documents were reviewed by our staff as requested; our comments follow.

We commend you for your goals to direct future growth in King County to areas most suited for it and efforts to preserve sensitive lands and farm lands. The policies you propose are critical. However, more specific policies would likely be needed if the goals are to be realized. We hope a procedure is developed to produce more specific goals. Not only would this implement your general policies, but would provide predictability for developers and for the community.

On page 22 you state that King County population could grow by 184,000 to 215,000 between 1980 and 2000. This is a significant increase for the county.

Unless critical fish and wildlife habitats are preserved and areas already impacted restored, the public's fish and wildlife resource will be greatly reduced below even current levels. The numbers and types of plant and animal communities would diminish. The effects would be:

- 1) reduced recreation;
- 2) reduced tourism;
- 3) reduced commercial and tribal fisheries;
- 4) reduced sporting goods store and photo store sales and reduced sales for many rural stores;
- 5) reduced quality of life. Surveys taken in urban areas, such as Seattle and rural/forested areas such as Tiger Mountain, have shown the residents place a high premium upon the birds and other wildlife they see.

Mr. Harold Robertson
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Page Two

Your pamphlet, "King County Streams -- A Disappearing Resource", demonstrates the inverse relationship between drainage basin development and fish returns. The greater the development, the poorer the stream's water quality and less fish return. Issaquah Creek and the Bear/Evans Creek system were the streams with the least development of their drainage basins and the greatest salmon returns. However, a recent visit to Issaquah Creek and South Lake Sammamish showed five tributary streams had recently been buried and built upon. Another visit showed an unmaintained oil separator discharging a steady surge of oil to the stream. Without specific development controls, which are enforced, we might not long expect Issaquah Creek to be a major producer of fish.

The other stream highly rated in your pamphlet was the Evans/Bear Creek system. According to your development guide, you have much of the headwater area planned for densities at four to eight units per acre. One proposal is for 3,600 housing units and 300 acres for a business park and stores.

Critical beaver ponds and wetlands provide the headwaters for Evans Creek. These areas provide summer stream flows and maintain downstream fish resources. Again, without stringent and specific controls and enhancement measures, the future does not hold much for the resources in and around this stream and headwater wetlands. Cumulative effects could be very severe.

On page 35 you state that in urban areas lower density zoning will be applied to lands with environmentally sensitive features. This is a critical component, but not only must lands be designated with lower densities, but setbacks and development controls need to be enforced. Fish and wildlife frequently migrate along traditional travel routes that have urbanized. A steelhead that spawns in Newaukum Creek needs to migrate through Auburn, Kent, Renton, Tukwila, and Seattle. Loss of additional shoreline vegetation, shallow water, and rearing habitat, plus addition of urban pollutants, will make it more difficult for this fish to survive the trip to sea or the return trip as a mature adult. Loss of rearing habitat (shallow intertidal areas) in the Duwamish and Elliott Bay has virtually eliminated the cutthroat trout fishery in the Green River.

We cannot overstress the importance of stream and riparian forest as being vital to maintaining intact natural areas with urban areas. These areas take on considerable wildlife value; as fragmentation of upland forest proceeds, the riparian woodland may be a last refuge.

Sensitive areas will be able to support greater numbers and types of wildlife if they are connected. Many of the wetlands you have identified in your inventory are already hydraulically connected by streams. Buffer strips should surround wetlands, lakes, and streams and connect them to each other or other undeveloped features (forest, large lake, Puget Sound).

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Page Three

The larger the buffer strip connecting and surrounding these sensitive areas the better. Narrow buffers would only support forest edge species. However, wider buffers would more closely approximate a natural woodland. A minimum of 100 feet of vegetation would be needed around wetlands, lakes, and streams to provide wildlife habitat. It is the minimum amount required to filter surface runoff and preserve aquatic environment.

When areas are especially sensitive, for example, when a significant anadromous fish stream is involved, buffers should be at least 200 feet wide on both sides of the stream. These are the areas eagles predominantly use for perching as they feed on spawned-out salmon. Eagle communal roosts and nests, as well as heron rookeries and grouse nests, would require setbacks of at least 600 feet to protect these resources.

In urban areas, habitat degradation can be constant and permanent. Storm water pollutants can enter with each rain and/or discharge to the stream. Noise and light can reduce or eliminate production of sensitive animals. Dogs and cats become serious predators upon spawning trout and salmon and young wildlife that depend upon these sensitive sites.

On page 89 of your draft you discuss a charge to raise \$12.4 million, of which \$4 million would be available for construction of regional drainage facilities. We point out that regional facilities can hold potential for serious impacts to fish and wildlife. Fish and detritus can become trapped; upstream fish migration can be restricted or prevented. Any facilities planned would need to be closely coordinated with our agency, as well as Department of Fisheries. We would also recommend that a part of your surface water management program be inspection and enforcement of the cleaning of oil separators and silt traps.

General Development Guide Plan and Policies

We commend your overall approach to environmental protection that encourages growth and development that is compatible with natural features and discourages alteration of natural features. In the book, "Design with Nature", Ian L. McHarg lists among the principles for conservation and development:

- "3. 50-year floodplains should be exempted from all development save agriculture, institutional open space and recreation...
5. Surface watercourses should be retained in their natural condition to a width of not less than 200 feet on each side of the stream. In general, they should not be cultivated..."

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Page Four

"7. All forests, woodlands, copses, and free-standing trees above four-inch caliper should be surveyed and subject to preservation regulations." (page 86)

Your policies, E-302, E-303, E-314, E-315, E-316, E-321, E-322, E-323, E-324, E-325, E-326, E-327, E-328, E-332, and E-334 are important to help protect fish and wildlife. We point out that in the existing ecosystem all wildlife are important and there is need to protect more than the habitats of endangered species.

We are concerned that many of the critical wetlands and fish and wildlife habitats are not identified in your Figure E-1, Open Space Lands. Major areas of concern include:

1. Lake Washington wetlands and tributary streams, including Juanita Bay, Yarrow Bay, North Creek, Swamp Creek, Bear Creek, Black River, and Issaquah Creek;
2. Evans Creek headwaters;
3. Green River wetlands, especially in Springbrook Creek area;
4. critical deer, elk, and mountain goat wintering habitat in the Middle Fork Snoqualmie watershed near North Bend;
5. salt marsh on Kellogg Island;
6. Vashon Island-Maury Island eelgrass, kelp, marsh, algae, and clam areas;
7. Snoqualmie River and its oxbows;
8. east and west Hylebos Creek;
9. Raging River;
10. headwaters of Tokul Creek, Patterson Creek, Stossel Creek, Griffin Creek, Harris Creek, Covington Creek, May Creek, Forbes Creek, Kelsey Creek, and Little Bear Creek.

Mr. Harold Robertson
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Page Five

The streams and wetlands in your plan are identified as individual entities rather than as integral systems. The streams, their water quality, their headwaters, adjacent wetlands, and streamside vegetation make up an interconnected system. For example, up to 90 percent of the biologic energy in the stream originates as leaf and needle litter from the forests. When a link in this system is removed, the whole system can collapse. This is why it is essential for sensitive areas to be connected to one another, to the greatest extent possible, in order to maintain the fish and wildlife resources dependent upon them.

Also of concern are the high densities apparently planned for sensitive areas:


1. four to eight units per acre in Evans Creek headwaters;
2. Green River wetlands designated as activity centers;
3. designation of portions of Issaquah Creek, North Creek, Swamp Creek, and Cedar River as activity centers.

These are areas where it will be essential that the sensitive areas and sufficient buffers are maintained. We recommend you develop specific policies to implement your goals and preserve sensitive lands and farm lands.

Thank you for sending your document. We hope you find our comments helpful.

Sincerely,

THE DEPARTMENT OF GAME



Bob Zeigler, Applied Ecologist
Environmental Affairs Program
Habitat Management Division

BZ:cv
Attachments
cc: Agencies
Region



STATE OF WASHINGTON

WASHINGTON STATE PARKS AND RECREATION COMMISSION

7150 Cleanwater Lane, KY-11 • Olympia, Washington 98504 • (206) 753-5755

July 6, 1984

(E-2668)

Mr. Harold Robertson, Manager
King County Planning Division
816 Alaska Building
618 Second Avenue
Seattle, WA 98104

Re: Supplemental Draft EIS: Executive Proposed General Development Guide

Dear Mr. Robertson:

Mr. David Heiser, our Chief of Environmental Coordination, is out of the office until July 16, 1984. Your extended deadline for comments on the Supplemental Draft EIS is July 13, 1984; therefore, I am responding in Mr. Heiser's absence.

In the section on Environment and Open Space, open space is recognized as being useful for providing both active and passive outdoor recreation. All currently existing State Parks' ownerships are classified as open space. From this it would appear that our master plans could be implemented within the guidelines furnished by this document.

On Page 41, Chapter 4, General Policy E-103 indicates that development should be prevented on floodways of 100-year flood plains. We feel that a number of recreation facilities are appropriate in flood plain areas. If the facility can be designed to be minimally impacted by the flood and also to provide minimal disturbance to the flood path itself, we believe we should be able to develop. Examples of compatible developments that come to mind include trail systems through natural areas and even such formal features as ball fields. At Yaeger Park, a city park here in Olympia, the summer time ball field becomes part of a storm water retention system and floods routinely to a depth of several feet during the winter. Since many of our parks are water related, we would not want to see a total ban on park use of 100-year flood plains. It appears that King County would be amenable to this suggestion since on Page 56 of your proposal, Policy E-332 speaks to new development or land modification in the flood plains. Perhaps a simple statement of clarification would be appropriate.

On Page 51, Coal Mine Hazards, your Policy E-310 indicates that coal mine hazard areas should be free of development. This is of particular interest to us in that figure E-6 which describes the coal mine hazards shows several areas in the Green River Gorge. We have several properties in this area and

Mr. Robertson

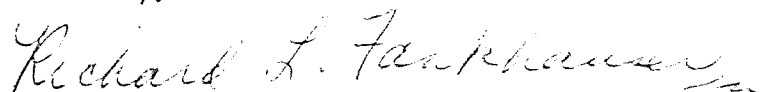
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July 6, 1984

as part of the Green River Conservation Area we will be acquiring more. We are aware of the hazards in the area and adequate measures will be taken to preserve public safety upon their development. We have a contract underway at the present time to permanently close the most prominent existing hazards in the area. Some of these areas will be sealed entirely and some sealed to view down into them for interpretation. If we are actually prevented from developing these sites shown in figure E-6, it appears that even a fair size parcel of the Flaming Geyser/Kummer area will need to remain undeveloped. In this area, for example, we have located an old mine tibble and have included its preservation and interpretation in our master development plan. We feel that a better approach to handling these hazards would be on a case-by-case basis rather than a total ban on development.

Thank you for the opportunity to review this document. We appreciate being involved in this endeavor.

Sincerely,



Richard L. Fankhauser, Chief
Site Planning & Acquisition

bh

cc: David Heiser, Chief, Environmental Coordination
Randy Person, Assistant Chief - Site Planning

VI. PUBLIC TESTIMONY

The following comments were made at the hearings held in six locations in the county on September 23, 1981.

My Name is MAXINE KEESLING, 15241 NE 53rd Street, Woodinville and I'll give you this bundle of stuff to peruse at your leisure on the EIS, which I will address first. On page 27, it talks about the alternatives to the proposed GDG in its current draft form including no action, or retention of the existing 1964 Comprehensive Plan. I go for that. On the bottom of page 30 they talked about a computer assisted vacant land inventory and development monitoring system for purposes of computing the land supply. Land would have to be vacant, free of environmental constraints, appropriately zoned and within the sewer local service area in order to be counted. It's not enough just to be in a local service area in order to compute a valid land inventory since it--there's a large area north of and south of NE 85th Street, east of 405 that has no large parcels, and you need big vacant parcels under one ownership for a developer would be expected to bring in the main and develop it. It's a bunch of small ownerships, there are no sewers there--the perc is absolutely lousy at that is included in the general--in the local service area maps and I presume would be counted as available for development but it's not really. Then also on page 36 it talks about growth reserves, and it's through the growth reserve areas that the urban/suburban communities would be planned in the future. Until these areas are planned for growth, low density and residential and rural uses would be permitted. Now Hollywood Hill is in this area where low density uses would be permitted until they're planned for growth--so what this Guide is telling me is that eventually the County is going to say "o.k. we're going to have dense development on Hollywood Hills." No longer will low density be permitted. The commuting areas of New York have permanently large lot zoning--one in two acre minimum lot sizes--King County even in its so-called urban reserve area needs some of those areas too and Hollywood Hill is one-horse oriented presently large lot area that should be permanent - but this Guide permits it only until the County decrees "pack 'em in." I forgot, this Map 1 plan concept land use pattern illustration which shows the rural area which according to the GDG is to be permanently rural and which in a newspaper account said would be a minimum of fifteen to 35 acres lot sizes and on up. This line for the rural area runs, I gather, along sort of the hill somewhere west of the Snoqualmie Valley Road. I suggest, and in that packet of stuff I gave you there is a map of the planning areas, community planning areas for King County and it shows the Snoqualmie planning area and it shows its line running along the west Snoqualmie Valley Road, 292 NE if there were a 292nd NE which is east of Ames Lake along the Tolt Hill Road and along the Redmond Fall City Road--I suggest that if you are going to adopt this Guide, and if we are going to have a rural area, that the line follow the community planning area so that we won't be splitting a community planning area to part rural and part growth reserve. The lines are so close, they should be the same and I think the west Snoqualmie Valley Road makes more sense. I have just one more comment on the EIS--that is on Page 153 it says, "Under policies of the proposed Guide the cost of future

residential development and designated rural areas could increase because the cost of the building lot would be higher because the minimum size building lot would be larger. That'd be that 15 to 35 acres and on up so obviously they would be higher. However, land development information indicates that building lots may be created faster than can be observed through building permits in outlying areas of the County. That's from their existing inventory so this information also indicates that there is a substantial supply of building lots in rural areas to dampen upward pressure on building lot prices in rural area. It says the LDIS data indicates that for the years 1979 and 1980 more building lots were created throughout the unincorporated area than were consumed by new construction. This excess of lots created increased an existing inventory of building lots, or excess of lots all over King County, both in urban reserve and rural due to the fact that the interest rate for building houses has dampened builders and professional builders and individuals who are planning to build, so there is an excess of building lots right now. But there's not as much in excess as indicated by these paragraphs because a lot of the short plats--owners may have wanted to sell only one piece - if they developed their property into four pieces and they're hanging on to the other three for themselves and their family--or whatever--they're just not on the market and will not be available for many years--and a lot of the lots that are not built on are counted as inventory have been sold by the original owner and they're--the new owners are waiting till they can afford to build, and once this permanent rural area is put in where lot sizes will be a minimum of 15 to 35 acres then of course, any one who has one acre to five acres and even 20 acres out there--once they realize there's going to be no more in that size category, they're going to shoot those prices up. O.K. no that's the extent of my comment on the EIS itself.

MIKE HUSA - I reside at 4050 NE 174th - My comment generally is in regard to EIS is that the document does not in my view adequately express the cost to the urban/suburban communities of increased density. As I understand the document, it supposes that approximately 300,000 people and employment of approximately 150,000 to 200,000 people will reside in these areas that are already urban/suburban. What the Guide fails to do and the EIS fails to address is the cost, the relative cost of development in these areas, if the services which are needed are overburdened. The cost of adding additional services in an urban community which is already developed, will be much greater for example, the cost of acquiring additional land to expand roadways, the cost of digging up roadways to install additional or larger water facilities and those kinds of costs are not addressed in the EIS, and generally speaking those costs would be greater per unit than the cost of developing new areas, which is not to suggest that the County should not attempt to limit growth, but into new current Communities. But that in doing so, in trying to channel growth, the County should recognize the disparate costs involved, and I don't believe the EIS does that.

DON MACDONALD, 15565 62nd Avenue NE, Bothell. I guess my position would be - I don't concur with the adequacy of the EIS. It, for instance supplies a negative context to speculation. If that notion were

true, I suspect that nobody would have gone west of Appalachia or have gone through the Cumberland Gap and the western part of the US would never have been developed. I've just superficially reviewed this - some of the, the conclusions aren't necessarily accurate. The costs, I think - in an economic context are determined in the market place and not by some planner's notion of what cost really is. Ultimately the consumer's going to pay that cost and I suspect that the marketplace sorts it out a little better, invisible hand, then the notion that the costs in a new development area are more than they are in the existing areas. I submit that if you restrict the supply of ground--in today's world, a \$40,000 lot as opposed ten years ago at \$7,000 seems like a lot of water pipe, or sewer pipe, or even a new park. So I think that in its outlook, it's--it tends to support a restricted supply of land--in our western democratic system, I don't think that that's the right way to go. We haven't covered any part of the land mass in this country--all you have to do is to get up in an airplane, but if we want to restrict it--like Waikali Beach and pay \$5,000 a front foot for ground is extreme, and I think that the whole notion of the idea is to do that--meter the growth if you will and I really don't see anything this really does not speak to the adequacy of the '64 Comprehensive Plan, and I think it should, and point out what areas, what parts of the '64 Plan are inadequate, why it can't be corrected, amended, amended, or whatever. I submit you wouldn't want to throw the whole plan out and so I think you should address that at some length, in the EIS. I think I'll reserve some of my remarks for the Guide.