



September 22, 2023

King County Growth Management Planning Council  
c/o Ivan Miller, GMPC Lead Staff  
King County Office of Performance, Strategy and Budget  
Mail Stop CNK-EX-0810  
Chinook Building 401 5th Ave Ste 810  
Seattle, Washington 98104

Dear Members of the Growth Management Planning Council,

Thank you for the opportunity to provide comments to the King County Growth Management Planning Council (GMPC) throughout the process to update the Countywide Planning Policies (CPPs). In July 2023, WSDOT submitted a comment letter expressing our support for the use of the original 1994 UGA line for the county's Four-to-One UGA expansion program and opposed allowing exceptions to this for the City of Snoqualmie and the City of North Bend.

We are writing you again to provide additional information on several matters that relate to the anticipated outcome of the proposed CPP amendments for the Four-to-One Program, should the recommended exceptions be approved. We have serious concerns that these separate but interrelated decisions will result in significant, cumulative impacts on the operation of WSDOT facilities, including the performance of the new \$188 million SR-18/I-90 Interchange investment, and ultimately the users of the transportation system in the Snoqualmie Valley.

These concerns are summarized below and further reinforce our support for the county using only the original 1994 UGA line and in its Four-to-One UGA expansion program. We've also included additional information in response to several questions raised about the interchange assessment included in our previous letter and our request for consideration at your September 27<sup>th</sup> GMPC meeting.

#### City of Snoqualmie Route Jurisdiction Transfer (RJT) Request

The City of Snoqualmie has submitted a request for the Snoqualmie Parkway to be transferred to WSDOT. The request is currently under consideration by the Washington State Transportation Commission. WSDOT has testified that Snoqualmie Parkway does not meet any applicable criterion set forth in the statute. According to the city's data, an overwhelming number of passenger vehicle trips, along with two-thirds of truck trips had at least one trip end within city limits and served a purpose and benefit to the city.

WSDOT comments also included a statement of our concern with further development within Snoqualmie impacting the state highway system. For additional context, attached is the June 28 letter that WSDOT submitted to the Washington State Transportation Commission.

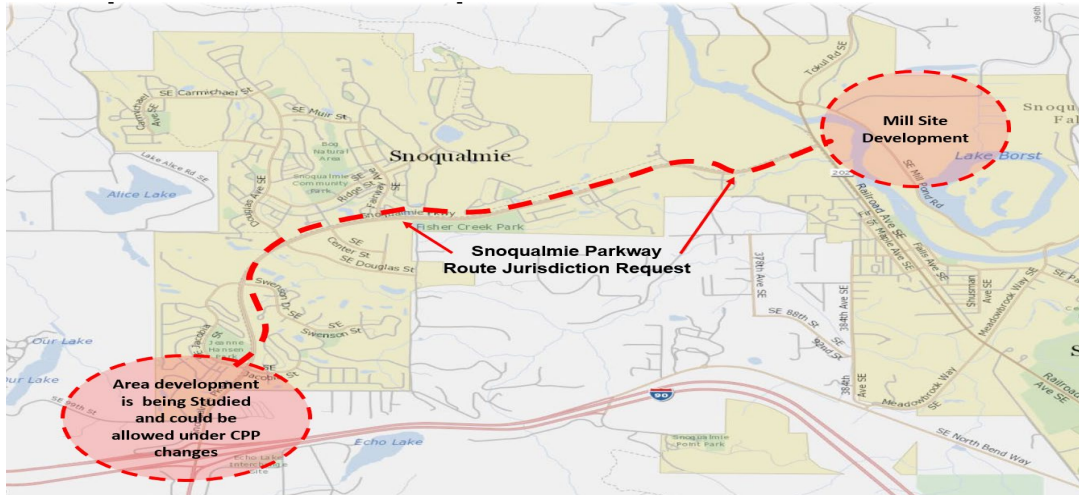
Should the Route Jurisdiction Transfer Request (RJT) be approved, WSDOT will be responsible for the traffic impacts on the Snoqualmie Parkway that result from development in and around the cities of Snoqualmie and North Bend, including any additional urban development which would be allowed under the proposed CPP changes for the Four-to-One Program. The Washington State Transportation Commission's recommendation to the Legislature is anticipated at its October 17/18 meeting.

#### City of Snoqualmie Mill Site Development

The City of Snoqualmie recently approved the Mill Site Development, a 261-acre site with 1.83 million sf of light industrial/manufacturing, warehouse, office, retail/restaurant, and residential uses. This development will have traffic impacts on SR-202 and the new SR-18/I-90 Interchange. WSDOT provided comment during the Environmental Impact Statement (EIS) scoping phase for the need to assess the development impact on the state highway system and expressed WSDOT's interest in reviewing the traffic impact analysis. Subsequently, the development of the EIS was completed without any input from WSDOT. To date, we have found no record that WSDOT was provided an opportunity to review and comment on the EIS, and we have no record of contact from the city on the subject, including in response to our initial scoping phase comments.

More recently, we were able to perform a preliminary review of the Mill Site EIS, along with evaluating potential trip generation of higher intensity urban development that would be allowed with the proposed Four-to-One policy amendments. This has increased our concerns regarding the proposed CPP changes. Based on this preliminary review, we have concerns that the Mill Site development EIS may have underestimated the combined development and background growth trips on SR202 and through the I-90/SR 18 interchange area. WSDOT is further troubled that if the Snoqualmie Parkway RJT is approved, the state is not only responsible for all the development-related impacts to existing highways, but also this new highway extension. The Mill Site EIS identifies several potential mitigation actions on Snoqualmie Parkway that WSDOT was not invited to review nor provide input and will be responsible for if the RJT request is approved.

Figure 1. Snoqualmie Valley Context Map



We also wanted to address several letters that have been submitted to GMPC in response to WSDOT’s July letter that question the development assumptions used to assess the impact that new urban development being studied would have on the new SR-18/I-90 Interchange. As specifically stated in our prior letter, we understand that the exact development that would be proposed and/or allowed in the interchange area is not certain. However, any higher intensity urban development up to and around the I-90/SR-18 Interchange and along I-90 has the potential to significantly degrade the safety and performance of the interchange area. There are numerous examples of the types of development that could be expected at similar locations (i.e., adjacent to freeways with convenient access from all directions). As we noted in our previous letter, the I-90/SR 18 Interchange Justification Report (IJR) did not anticipate additional development up to and around the interchange and assumed the areas would remain rural under the county’s zoning.

Furthermore, we maintain our concern that the recommended policies allowing exceptions for select jurisdictions are based on a request with urban development already in mind, not based on a countywide or regional need or policy rationale. In addition, the recommended policies do not include criteria that would guide and limit other cities from requesting the use of their JPA for the Four-to-One program instead of the 1994 UGA boundary. This could result in additional JPAs located in areas beyond the contiguous UGA where larger parcels are more likely available and more easily qualify for the Four-to-One expansion program, which ultimately could undermine the use of the 1994 UGA as the baseline for the program and result in more unplanned and unanticipated challenges on the local, regional, and state transportation network.

WSDOT Request

WSDOT continues to support an approach to the Four-to-One program that uses only the 1994 UGA as the criteria and does not provide exceptions for select jurisdictions. This approach is consistent with the Growth Management Act's intent to limit urban sprawl, protect rural lands and environmentally sensitive areas, promote infill development, and help ensure that state investments in transportation serve the users safely and efficiently as intended.

However, if GMPC is still considering allowing exceptions for the City of Snoqualmie and the City of North Bend, we ask that the action on this specific amendment to the CPPs be delayed until the next annual amendment cycle. This delay will allow WSDOT the time necessary to 1) determine whether the state will be responsible for the Snoqualmie Parkway through the route jurisdiction transfer process and 2) work with the city to collect additional information and conduct a more adequate review and analysis to fully understand what the combined impact on state facilities of the Mill Site development and potential additional development resulting from the expansion of the Four-to-One program will have on the state facilities within the Snoqualmie Valley.

This delay will also allow the City of Snoqualmie time to discuss its housing growth targets with King County further. As the city described in the attached response to WSDOT, it will be requesting an adjustment to its 2044 housing targets based on its ability to accommodate growth without annexing areas along the I-90/SR-18 interchange. WSDOT supports this issue being addressed in a comprehensive process and resolved before adopting policy exceptions in the CCPs.

Thank you for your consideration.

Sincerely,

*Brian D. Nielsen*

Brian D. Nielsen (Sep 22, 2023 12:49 PDT)

Brian Nielsen, PE  
Regional Administrator  
Northwest Region

Enclosures (2)

cc: Roger Millar, Secretary of Transportation  
Amy Scarton, Deputy Secretary of Transportation  
Julie Meredith, Assistant Secretary Urban Mobility and Access and Megaprograms  
Robin Mayhew, WSDOT Deputy Northwest Regional Administrator  
Mark Leth, WSDOT Assistant Regional Administrator – Traffic  
Steven Breaux, WSDOT Director of Legislative Relations  
Jeff Storrar, WSDOT Policy Manager



## Office of the Mayor

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**Katherine Ross**

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August 18, 2023

Robin Mayhew, AICP  
Deputy Regional Administrator  
WSDOT Northwest Region  
P.O. Box 330310  
Seattle, WA 98133

### **RE: City Response to July 12, 2023, WSDOT Letter to GMPC**

Dear Ms. Mayhew,

This is regarding your recent letter to King County Growth Management Planning Council (GMPC). The City of Snoqualmie is making significant efforts to plan for and accommodate housing for all economic segments in accordance with the Growth Management Act (GMA) as part of the City's 2044 Comprehensive Plan update. A Housing Needs Analysis and Housing Strategy Plan, along with a Buildable Lands Analysis, were completed in the spring of 2023 to address the Department of Commerce's Projected Affordable Need and King County allocated growth target<sup>1</sup>. The results of these studies indicate a limited amount of buildable land remaining within existing city limits. This is a notable change from Snoqualmie's considerable development over the past 20 years.

In 2009, the King County GMPC updated municipal targets, established a city target of 1,615 housing units and 1,050 jobs to be demonstrated and accommodated by the year 2031. We met and exceeded that demand with the development of Snoqualmie Ridge I and II more than ten years ago. Our 2044 growth targets are 1,500<sup>2</sup> housing and 4,425 jobs; and accommodating new growth will require tradeoffs and adjustments.

The King County Four-to-One Program using a potential JPA/UGB boundary would provide residential development opportunities with a limited density of R-8 (eight units per acre). Only a few select properties along the I-90/SR-18 interchange would be eligible to use this Program. We are aware of one property owner, (tax parcel 0223079063) who is interested in using the potential JPA/UGB boundary to develop a range of 51-94 units. No commercial development is included in this zoning. The final achievable density would be impacted by designated buffers and achieved open space stipulated in the Program as well as King County application and approval. To be clear, there is no planned development of 288 units, 576 bedrooms and 425 parking stalls, as stated in your letter. Furthermore, based on the recently completed

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<sup>1</sup> **Growth Targets:** The Snoqualmie Valley has an adopted 2044 growth target of 2,656 units (*King County Urban Growth Capacity Report, June 2021*).

<sup>2</sup> **Affordable Projected Need:** The State draft methodology would allocate approximately 129,541 new affordable housing units at 0-30% Area Median Income (AMI) to King County, and over 308,000 total units to King County. The Valley's share of projected housing is approximately 1.6% with an expected 1,500 units for the City of Snoqualmie.

transportation assessment for the proposed project, vehicular impacts would be less than 1 percent on the I-90 westbound ramps and less than 0.5 percent on the I-90 eastbound ramps intersections with SR 18<sup>3</sup>.

Snoqualmie's achievable housing units may be lower than the current target in the King Countywide Planning Policies. A review of buildable land within the City's Potential Annexation Area (PAA) shows that out of the approximate 721 acres in the PAA, the current buildable land acres equate to approximately 98 acres<sup>4</sup> and a portion of that development is anticipated to be commercial. To understand the City's limitations, our City Council held a Housing Policy Round Table on June 12, 2023. This resulted in steps to request an adjustment to the assigned housing targets based on existing studies and limitations on the City's ability to accommodate growth without an annexation into city limits along the I-90/SR-18 interchange.

It is clear that Snoqualmie's projected housing numbers will have little impact on the transportation corridor and should have already been built into WSDOT's assumptions. In addition, the City has repeatedly expressed our concerns about regional traffic and its impacts to Snoqualmie Parkway. This arterial is used as an extension of SR-18. In fact, the 2022 PSRC Regional Transportation Plan<sup>5</sup> analysis showed that about 35% of traffic on the Snoqualmie Parkway is generated from outside the city, or regional in nature. This percentage increases to approximately 40% in future model years. Because the Parkway acts as a bypass route for commuters wanting to avoid SR-405 and I-5 congestion, it facilitates large movements of regional populations as well as freight from northern King County areas to east and southeast King County. Similarly, vehicles traveling on SR-18 use the Parkway to travel north to the cities of Redmond, Carnation, Duvall, and Monroe. We hope you have included this increasing regional traffic in your assumptions of potential traffic impacts to the I-90/SR-18 interchange.

In summary, as the City most frequently affected by the I-90/SR-18 interchange, we desire the successful operation of WSDOT investments, and we appreciate your planning efforts. The King County Four-to-One Program using a JPA/UGB boundary would allow Snoqualmie to work towards achieving our housing targets, with minimal impact on traffic volumes. The City hopes you update your letter with the proposed local growth and traffic assumptions and provide to GMPC before the upcoming September 27, 2023, meeting.

Thank you for your consideration.

Sincerely,



Katherine Ross, Mayor  
City of Snoqualmie

Encl: WSDOT King County GMPC Comments 7.12.23 Final  
Snoqualmie Gateway Village Preliminary Transportation Assessment  
cc: GMPC Planning Council  
Ivan Miller, GMPC Lead Staff  
Brian Parry, SCA Senior Policy Analyst  
Lauren Smith, Director of Regional Planning  
Sara Perry, King County Councilmember

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<sup>3</sup> Transpo Group Memorandum to GMPC, "Snoqualmie Gateway Village Preliminary Transportation Assessment" dated August 11, 2023.

<sup>4</sup> Estimate of buildable acres based on removing from the total include homes, public/utility, tribal properties, critical areas and buffers including steep slope/buffers 50', landslide hazard/buffers 50', wetland/buffers 225' and streams/buffer of 100'.

<sup>5</sup> Regional Transportation Plan 2022-2050, dated May 26, 2022



**Washington State  
Department of Transportation**

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310 Maple Park Avenue S.E.  
P.O. Box 47300  
Olympia, WA 98504-7300  
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June 28, 2023

Mr. Roy Jennings, Chair  
Washington State Transportation Commission  
P.O. Box 47308  
Olympia, WA 98504-7308

Dear Mr. Jennings:

Thank you for the opportunity to comment on the City of Snoqualmie's Route Jurisdiction Transfer (RJT) proposal regarding Snoqualmie Parkway. We appreciate the early engagement that WSTC organized for all parties to preliminarily discuss the issues surrounding this request. During that initial engagement, I expressed WSDOT's opposition to the proposal. Our position remains unchanged.

On behalf of WSDOT, I would like to provide more detail about our concerns with the City of Snoqualmie's RJT proposal and the Transportation Improvement Board (TIB) evaluation. Recognizing the upcoming study of the RJT process, pursuant to the enacted transportation budget, ESHB 1125 Section 205(4), we also offer suggested opportunities to improve the existing RJT evaluation criteria.

**Concern about the City of Snoqualmie's RJT proposal**

We listened in on the TIB staff briefing statement and findings delivered to the Commission in May and noted the Commission's approval of preliminary findings. We have also reviewed the City's proposal submitted on October 2, 2022, along with supplemental information that the City subsequently provided to us.

Our typical experience with RJTs has been:

- A request to decommission a state highway,
- A funded extension/addition to the existing highway system supported by legislative intent, or
- A situation involving two or more roadways where jurisdictional control and responsibility are exchanged.

In the latter two cases, such action is supported with either full funding or an exchange of funding responsibilities.

The City of Snoqualmie's proposal does not fit these scenarios as it is entirely one-sided, where the City is released from financial and legal responsibilities that would then be transferred to the State. A primary concern is Snoqualmie Parkway's pavement condition. The pavement has exhibited signs of deterioration for years but the City had

not seemingly prepared for the necessary pavement preservation work. We also disagree with the position that because a majority of Snoqualmie Parkway vehicle trips extend outside of the city limits, the roadway impact of these “regional” trips should be the responsibility of the State. The fact is that the vast majority of these trips are directly related to a purpose or purposes within the City of Snoqualmie.

### **City of Snoqualmie Pavement Rehabilitation**

Within the City’s transmittal letter accompanying their justification report, they noted that the State’s Supplemental Transportation Budget was providing funding for almost 80% of this year’s Snoqualmie Parkway pavement rehabilitation project. This state contribution is now funding 100% of the City’s pavement rehabilitation project as the awarded contract amount is less than the state provided funding. The City’s transmittal letter went on to state that if the RJT was approved, the “State will receive a transportation facility that does not require improvement or immediate maintenance.” We acknowledge that the statutory requirements do not account for the subject facility’s overall condition, but we feel it is important to state that we unequivocally disagree with the City’s assessment.

Upon reviewing the City’s plans for their current paving project, it is evident that the existing roadway HMA pavement depth is significantly less than what WSDOT requires for the traffic loads that have been experienced to date and what are anticipated in the future. The original pavement section was significantly under-designed<sup>1</sup> and is not being modified with the current pavement preservation work. The visible pavement deterioration of Snoqualmie Parkway, evident for several years now, highlights this issue. While this deterioration has been evident for several years, there appeared to be inadequate budget planning to repave Snoqualmie Parkway utilizing primarily city funds. Because the current paving project does not correct the pavement depth deficiency, we fully expect that the new pavement will deteriorate in a similar manner and along a similar timeline, leading to increased and ongoing maintenance requirements and premature need for a subsequent pavement preservation project. The appropriate remedy to this will require substantially more investment.

### **Purpose and benefit of vehicle trips on Snoqualmie Parkway**

Regarding the primary themes included within the City’s justification report, Snoqualmie Parkway travel is portrayed to be in large part “regional” in nature. There is also considerable discussion of the truck traffic on the roadway, and that the existing facility is designated as a T-3 freight corridor within the State Freight and Goods Transportation System Plan. We have not independently collected data but have reviewed data and information that the city provided. Listed is a summary of key points:

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<sup>1</sup> The original pavement design report indicates that the pavement was designed for the anticipated vehicle loading for a 20-year design period. WSDOT’s standard, at the time of the Snoqualmie Parkway design and still today is to design a pavement for vehicle loading over a 50-year design period.



- Only 6% of passenger vehicle trips are pass-through, not having an origin or destination within Snoqualmie.
- Just 1/3 of truck trips are pass-through, having both an origin and a destination external to Snoqualmie.
- Overall, trucks make up approximately 9-10% of the daily vehicles traveling on Snoqualmie Parkway, depending on where measured.
  - 90% of the truck trips are the types that include large pick-ups, and delivery/utility vans or trucks that would not have a significant determinantal impact on the pavement, if adequately designed and constructed.
  - The remainder (approximately 1% of all traffic) was estimated to be larger trucks.

The low usage of Snoqualmie Parkway as a through route for passenger vehicle trips is not indicative of a regional route. The truck percentages are not unlike many roadways within the region, including primary roadways that are not state highways. The large percentage of smaller trucks traveling on Snoqualmie Parkway is indicative of trips supporting local commerce and less indicative of regional freight movement. The designation of T-3 freight route is not overly remarkable either. A T-3 designation within the State Freight Plan indicates annual freight tonnage of up to 4 million. There are hundreds of city streets just in King County alone that are categorized as T-3 and are not designated as state highways. Numerous other non-highway, city streets in King County are designated as T-1 and T-2 freight routes, carrying substantially more tonnage. Again, these numbers are only for King County, a fraction of the overall state roadway network.

WSDOT has not performed a thorough review of the roadway to understand potential safety, operational and maintenance issues. We are aware that the City has identified the SE 99<sup>th</sup> Street intersection as a priority need for adding intersection control within their unfunded 2021-26 STIP. There also remain several planned and potential large developments within the City, including the Mill Site development, that will have primary access via Snoqualmie Parkway. This includes the City's more recent request to include an exception to the Urban Growth Area baseline (referred to as the Joint Planning Area) to allow further development within the City, in areas that are currently not allowed under the 1994 UGA.

#### **Vehicle travel impact on Snoqualmie Parkway pavement condition**

This RJT request is based on the City's narrative that any vehicle trips that are not solely within city limits fall into the category of "regional" trips and therefore, since the majority of trips fall in this category, the State should be responsible for ongoing maintenance, operation, and preservation of Snoqualmie Parkway. I reiterate this point regarding trip origin-destination because it is an underlying basis of the City's position on why this RJT should be approved.

This argument is non-sensible. Trips that have one end or the other within the city clearly are for the benefit of citizens and/or businesses within the city. These trips include delivery and utility trucks serving the City's residences and businesses, and the considerable truck traffic generated while constructing Snoqualmie Ridge and other existing developments, as well as future planned development. The City's assertion that the overwhelmingly large percentage of "regional" trips are not benefiting the City is not supported by the data they provided. Again, approximately 94% of passenger vehicle trips and approximately 2/3 of all truck trips on Snoqualmie Parkway have a trip purpose (origin and/or destination) within city limits.

**Concerns with the Transportation Improvement Board findings.**

At the May 2023 WSTC meeting, the Commission approved preliminary findings offered by TIB staff that stated that the City of Snoqualmie's request met two criteria defined in RCW 47.17.001: Subsections (3)(c) and (4)(d)(iii). WSDOT was informed at the outset that TIB would be performing an independent analysis. We have subsequently been informed that there is no such analysis documented, and only the findings as reported. The fact that there was no analysis provided leads me to conclude that TIB accepted the information provided by the City as some basis for their recommendation. This is disappointing given that the existing statutory criteria are overlapping and vague in some areas, and some level of analysis and comparison to other facilities should be required to determine applicability.

In the following, I'll address the specific RCW 47.17.001 criteria that TIB staff are proposing support this route jurisdictional transfer request. [Note - bold and underlined text have been added for emphasis.]

***RCW 47.17.001(3)(c)***

*An urban highway route that meets any of the following criteria should be designated as part of the state highway system:*

*(c) Is an urban extension of a rural state highway into or through an urban area **and** is necessary to form an integrated system of state highways;*

- This criterion does not define what constitutes "necessary." The existing highway system in place for decades prior to construction of the Snoqualmie Parkway provided connectivity with SR202 and I-90, and with SR18 and I-90.
- In the absence of clearly defined criteria, context within the entire statewide roadway network is important. There are numerous non-highway routes (city streets and county roads) that serve as de facto primary connections between state highway routes that carry considerably more regionally oriented, pass-through trips. Snoqualmie Parkway usage does not rise to a level above ordinary in this case.

***RCW 47.17.001(4)(d)(iii)***

*The following guidelines are intended to be used as a basis for interpreting and applying the criteria to specific routes:*

*(d) Exceptions may be made to include;*

*(iii) Urban connecting links as state highways that function as needed bypass routing of regionally oriented traffic and benefit truck routing, capacity alternative, business congestion, and geometric deficiencies.*

- Again, this criterion is vaguely written and could be applied to hundreds of non-highway routes. As noted previously, there is nothing extraordinary about the origin-destination trip pairs utilizing Snoqualmie Parkway. Just 6% of passenger vehicle trips are pass-through in nature and there is an estimated 10% truck traffic, with the vast majority smaller types. Approximately 2/3 of the current truck trips are directly tied to some purpose within the city. These traffic patterns are not unlike what occurs on many non-highway, city streets and county roads throughout the region.

In response to other criteria cited in the City's RJT request:

***RCW 47.17.001(2)(a)***

*A rural highway route may be designated as a state highway if it is part of an integrated system of roads **and**:*

*(a) Carries in excess of three hundred thousand tons annually **and** provides primary access to a rural port or intermodal freight terminal;*

- Per the Washington State Freight System Plan, there is no designated rural port or intermodal freight terminal in the vicinity, connected to Snoqualmie Parkway. Therefore, this criterion does not apply.

***RCW 47.17.001(3)(d)***

*An urban highway route that meets any of the following criteria should be designated as part of the state highway system:*

*(d) Is a principal arterial that is a connecting link between two state highways **and** serves regionally oriented through traffic in urbanized areas with a population of fifty thousand or greater, **or** is a spur that serves regionally oriented traffic in urbanized areas.*

- The population of Snoqualmie/North Bend, and surrounding area in the vicinity falls well short of the specified population threshold.
- There is no minimum percentage of regionally oriented trips specified, but within the context of numerous other well-traveled, non-highway city streets and county roads throughout the state, this should not be a qualifying criterion for this RJT.

Mr. Jennings  
June 28, 2023  
Page 6

**Closing and opportunities to improve the existing RJC evaluation criteria**

In closing, thank you for providing this opportunity for WSDOT to comment on the City of Snoqualmie's proposed Route Jurisdiction Request. It is WSDOT's position that Snoqualmie Parkway does not meet any applicable criteria set forth in RCW 47.17.001. We do not believe Snoqualmie Parkway to be a significant regional facility as shown by City provided data and comparison to other roadways. Further, Snoqualmie Parkway travel has been and will continue to be substantially associated with activities within the City.

In our experience, this request is unique in its completely one-sided nature. It adds a significant burden to the State's maintenance and preservation programs and adds potential tort liability for the State.

What this issue and subsequent discussion highlight is there is a vital need to undertake a review of the existing statute to determine whether the current criteria should be retained or modified. We find the criteria to be vague and difficult to apply to different contexts.

We are pleased that the WSTC will be undertaking a formal review over the coming biennium. We urge you to thoroughly evaluate the current criteria and process before determining preliminary recommendations for any changes in jurisdictional assignment.

Finally, as indicated above, we have concluded the RJT should not be approved based on the criteria set forth in RCW 47.17.001.

Sincerely,



Brian Nielsen, PE  
Regional Administrator  
Northwest Region

cc: Reema Griffith, Executive Director  
Paula Reeves, Senior Policy Analyst