



King County

## Urban Growth Area Expansion Policies and Four-to-One Program Review

### Summary of Public Review Draft Input

#### I. Background

On June 1, 2023, King County released the Public Review Draft (PRD) of its 2024 Comprehensive Plan Update for a 45-day comment period. The public was able to submit PRD input via four online surveys, an open-ended comment option at the end of each survey, email, and four public meetings.

The PRD included a summary of key proposals to help orient the public to the potential changes in the 2024 Update package. This summary was also used for the surveys, which allowed the public to indicate whether they agreed, disagreed, or were unsure about each of the summarized proposals. This summary was developed in early May in order for it to be translated in eight languages before publishing on June 1. Given this, the May 17 Growth Management Planning Council (GMPC) recommendations on the Urban Growth Area (UGA) expansion policies were unable to be reflected in the summary and survey. Instead, it was noted that the GMPC was reviewing the issues, and the recommended policy and code changes for the Four-to-One Program were provided separately.

This document summarizes the written Four-to-One Program input received via the survey, email, and online comments. To center priority populations, responses from Black, Indigenous, People of Color, people with low incomes, immigrants, and/or refugees are listed first in each response type and emphasized in blue.

#### II. Survey Responses

There were 315 responses to the Four-to-One Program survey item (included below), with the highest percentages being "unsure" about the potential changes. This is not surprising, as the proposal summary in the survey was vague due to the timing issues noted above.

Proposal Summary	Disagree	Unsure	Agree
The GMPC is currently considering possible changes to the Four-to-One program.	Priority Populations 25%	Priority Populations 43%	Priority Populations 32%
Some of the changes being evaluated include whether to allow: reduced open space dedication for lands with high ecological value, facilities to be located in the rural area, nonresidential developments, multifamily developments, and projects along the Urban Growth Area boundary as set by previous joint planning agreements rather than the original 1994 boundary.	All Responses 29%	All Responses 44%	All Responses 26%

Proposal Summary	Disagree	Unsure	Agree
If changes are recommended by the GMPC, the Comprehensive Plan and King County Code would also need to be amended accordingly. The scope of those changes will be determined when the GMPC completes its review.			

There were 474 responses to the UGA exchange survey item (included below), with the highest percentages not supporting exchanges.

Proposal Summary	Disagree	Unsure	Agree
In 2022, the Washington State Legislature passed SB 5593, which allows, but does not require, counties to utilize Urban Growth Area exchanges when specific conditions are met. The state law would allow lands currently in the Urban Growth Area to be removed in exchange for rural lands added to the Urban Growth Area in areas pressured by patterns of development that exceed available, developable urban lands. The Countywide Planning Policies would need to be amended in order use this allowance in King County. The GMPC is currently evaluating whether to recommend allowing such exchanges. If recommended, the Comprehensive Plan and King County Code would also need to be amended accordingly. Those changes will be determined when the GMPC completes its review.	Priority Populations 55%	Priority Populations 22%	Priority Populations 22%
	All Responses 44%	All Responses 30%	All Responses 26%

### III. Emailed Comments

There were four emailed comments about the Four-to-One Program. These emailed comments are attached at the end of this summary; below are key excerpts. Comments were split between using the 1994 UGA and using Joint Planning Areas.

- Excerpt from letter from Futurewise: "Futurewise supports basing Four-to-One Program applications on the Urban Growth Area line adopted in 1994 as called for in existing Policy U-185."
- Excerpt from letter from Mountains to Sound: "Thank you for the opportunity to write in support of proposed amendments to the King County’s Countywide Planning Policies DP-17 and King County Comprehensive Plan U-185 which clarifies lands adjacent to the city of Snoqualmie’s Urban Growth Area are eligible for consideration as part of the King County Four-to-One Program."
- Excerpt from letter from the Joint Rural Area Team (previously known as Unincorporated Area Councils): "We support the GMPC’s May 2023 recommendations." Concern was expressed

about King County Comprehensive Plan Policy RP-106:<sup>1</sup> "We don't know why this has not been caught over the years, but this seems to imply that Four-to-One proposals are exempt from GMPC actions. The wording should be changed for better clarification."

- Excerpt from letter from Washington State Department of Transportation: "WSDOT supports the use of the 1994 UGA when evaluating UGA expansion requests but does not support making exceptions for select jurisdictions."

While not specific to the Four-to-One Program, two emailed comments were received relating to protecting rural lands and UGA exchanges. Two excerpts are included below; they generally leaned towards keeping rural lands rural.

- "Please do not densify housing or high rise housing in unincorporated KC and keep it rural. ..."
- Excerpt from letter from Joint Rural Area Team (previously as Unincorporated Area Councils): "In general, we do not support the concept of UGA Exchanges and are concerned about setting a precedent that could harm the integrity of the UGA elsewhere in the County."

#### IV. Online Comments

There were no online comments specifically about the Four-to-One Program. However, 26 online comments were received relating to converting rural land to urban, sprawl, protecting rural lands, protecting/creating open spaces, allowing expansion, and supporting more urbanization. The comments are included verbatim below; they generally leaned towards keeping rural lands rural and supporting protection of open space.

- "Put emphasis on reusing existing (former) built sites to increase housing. PROMOTE BUILDING SITE FOR HOUSING THAT ARE ALREADY BUILT UPON RATHER THAN CREATING NEW HOUSING SITES FROM UNDEVELOPED (NATURAL) SITES THAT ARE UNDEVELOPED). If we take all of the natural environment to make it urban we have less of what makes this area special from the rest of the country . . . . GREEN SPACE"
- "Keep the high density housing in the urban areas where resources and public transportation is more reliable. Keep the unincorporated and rural areas green for local farming and rural living. Single family homes with acreage will be able to have gardens and small livestock to be more green and self sufficient. Producing less waste, and have a smaller carbon footprint. People of all ethnicities love both urban and rural communities. They should choose where they want to live."
- "One of the best ways to address climate change and general environmental health is to avoid suburban strip-mall sprawl by focusing growth to within the cities. Much of the rural unincorporated areas have already been developed as much as should be allowed."
- "... I do not like the 'exchange' of land. I believe open space for communities to have a garden or play area should be a requirement for urban development, while leaving open land in undeveloped areas is also a benefit for everyone. Trading land takes away natural wetlands and other habitat for wild animals."

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<sup>1</sup> "RP-106 Except for Four-to-One proposals, King County shall not amend the Urban Growth Area prior to the Growth Management Planning Council taking action on the proposed amendment to the Urban Growth Area."

- "King County covers a broad array of populations and areas from downtown Seattle to Vashon Island. We should be treating these areas of unincorporated King County in ways that are appropriate for their specific needs and looking to both foster urbanization in already urban areas and preserve the remaining rural ones. These rural areas enable all King County residents (and visitors!) to easily access nature, wildlife, and agriculture — access to which is critical for maintaining a sense of connection with our humanity and area of the world we all choose to call home."
- "... My position is limit rural growth, utilize existing urban boundaries more efficiently."
- "I feel as though a lot of thought and effort has been put into how to change zoning laws to allow for multi use. However, this restrictive approach will not help in covering all housing needs. If the County Also adopted a more lenient land use policy, private developers would be free to build as much housing as economical, driving urbanization and lowering housing costs for everyone. The Primary counter to freeing up zoning laws to allow for this is that it would drop land values, and tax revenues accordingly. However I believe that this trade off would be a good investment into the future as Tax revenues could be compensated by larger number of residents then housed in urban King County. A great example of more relaxed Zoning Successes can be seen in Japan, Germany, and South Korea. In these places private development was able to build to demand, and has driven safe and sustainable urbanization without the government needing to incentivize "Low-income" housing. Additionally if one states that housing developers don't have an incentive to build as much housing as economical, we'd be looking at a housing monopoly, because competition should always bring the market into Cost/Quantity Equilibrium if allowed."
- "King county should put emphasis on pushing for denser development of already urbanized lands instead of continuing the sprawl into rural king county. When expansions are made into previously rural areas, the transportation infrastructure should be scaled up to adequately handle the new volumes of traffic. Additionally running consistent Transit options to allow for rural parts of the county to reliably commute to work would decrease the load on rural roads."
- "Zoning should be local and the scenario for unincorporated areas should look to the retention of the character of the areas. Rural and rural suburban should remain such. Let density occur in cities and towns on their own terms."
- "I don't support any zoning changes that will increase zoning and therefore more homes and less open spaces. There are trees being cut down and land being used to create housing everywhere. We will not get the land back if we keep building in any open space. It's ruining the environment, the homes of the wildlife and the appeal to living in less urban areas. ..."
- "I do not think the county should be allowed to change rural to urban without a vote of those living/paying taxes on the land."
- "We must limit urban sprawl and upgrade and enhance regional transit availability and options. Open space and rural lands must be protected. Critical habitat must be restored even if it means reduction of commercial agriculture."
- "Stop trying to put high density housing in rural and suburban areas."

- "To be honest, my priorities around housing are to reduce sprawl and provide more housing for people who make 50% or less of median income. ... I'm worried about sprawl because of climate resiliency and the need for things like wetlands and forest to provide for the water cycle and animals ..."
- "Preserve agricultural and rural lands from any commercial use. Keep urban areas urban and rural areas rural. Promote dense livable cities where living wages, services, entertainment, recreation and livable housing is available to all. ..."
- "We cannot continue to build over the dirt to satisfy urban sprawl. The PNW has been the bench mark for land and animal life conservation, a beacon of hope. Don't destroy this legacy!"
- "I am very concerned about our housing crisis and believe that we need to allow much more development within the urban growth boundary, well beyond the minimum that is proscribed, in order to lower housing costs long term."
- "Just stop in allowing housing and commercial developments to encroach in unincorporated King County. Leave some open space and trees and forests and wildlife."
- "Repeal the GMA, build better train network and highways, and expand. The high house prices in KC are entirely self inflicted because of a lack of expansion."
- "I think it's extremely important to have a plan for re-creating old growth trees in large numbers. It will take generations, but we must do this or I fear the worst. The other piece is plenty of open space for wildlife to thrive where humans can NOT hunt or bother them under penalty of law."
- "The most critical steps we as a community must undertake are equity for all members of our community and reduction of waste, reduction of consumption, reduction of community footprint, enhancement of density, available mass transit options, clean air and water initiatives, and open space protections. We must do the most good for ALL our area inhabitants and the health of our environment and ecosystems, no matter challenges or the costs. Our legacies must be beneficial for all who come behind us."
- "I would like to see stronger protection & preservation of wilderness and pristine areas, and instead find more efficient ways to use land that's already been developed so there's no need to encroach into wilderness, the less wilderness there are the less resilient we'll be against the effects of global warming."
- "... Please protect and enhance parks, agricultural lands, and tree canopy. Minimize sprawl."
- "Please protect the rural nature of unincorporated King County. Green space and natural habitat are important. ..."
- "The fact that EV's appear to be more important to you all for solving climate change and mixed use development, denser zoning, bike infrastructure, and public transit is troubling. We will never make much progress if we don't tackle sprawl."
- "More density, less sprawl. Change zoning laws to accommodate for more land uses"

Public Comment Period on  
Public Review Draft of the  
2024 King County Comprehensive Plan

July 2023

Comment Letters & Excerpts  
Related to the  
Review of the Urban Growth Area Expansion  
Policies and Program

1. Futurewise - excerpt.....PDF page 7
2. Mountains to Sound Greenway.....PDF page 8-10
3. Joint Rural Area Team Letter - excerpt.....PDF page 11
4. Washington State Department of Transportation.....PDF page 12-15

**NOTE: UNRELATED TEXT REMOVED**

## Comments on Chapter 2 Urban Communities

Futurewise appreciates and supports the increased emphasis in this chapter on equity and health.

Futurewise supports the amendments to Policy U-134 to reflect allowing middle housing in appropriate residential zones.

Futurewise supports basing Four-to-One Program applications on the Urban Growth Area line adopted in 1994 as called for in existing Policy U-185. Allowing additional areas beyond the 1994 urban growth area (UGA) will increase development on the edge of the UGA where it is expensive to serve and will generate greenhouse gas pollution. For example, the Washington State Department of Transportation estimates that a proposed urban scale development beyond the 1994 UGA the new I-90/SR-18 Interchange “will significantly increasing delay and congestion at the I-90 ramps and reducing the expected safety and operational benefit over the design life of the project.”<sup>1</sup> These adverse impacts are why existing Policy U-185 limiting Four-to-One Program applications on the Urban Growth Area line adopted in 1994. This is smart policy and should be retained.

**NOTE: UNRELATED TEXT REMOVED**

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<sup>1</sup> Washington State Department of Transportation letter to King County Growth Management Planning Council p. 1 (July 12, 2023) at the Dropbox link in the last page of this letter of this letter with the filename: “WSDOT\_King\_County\_GMPC\_Comments\_7\_12\_23\_Final.pdf.”

**JOINT RURAL AREA TEAM COMMENTS**

**RP-106**      ***Except for Four-to-One proposals, King County shall not amend the Urban Growth Area prior to the Growth Management Planning Council taking action on the proposed amendment to the Urban Growth Area.***

We don't know why this has not been caught over the years, but this seems to *imply* that Four-to-One proposals are *exempt* from GMPC actions. The wording should be changed for better clarification.

**NOTE: UNRELATED TEXT REMOVED.**



**2024 KCCP Major Update Public Review Draft**

***JOINT RURAL AREA TEAM COMMENTS***

***Supplemental Changes - Four-to-One Program***

[Growth Management Planning Council \(GMPC\) Motion 23-3](#)

[Countywide Planning Policy Amendments](#)

[Comprehensive Plan Amendments](#)

[King County Code Amendments](#)

We fully participated in each of the bi-monthly GMPC Meetings that addressed these topics and offered both *Oral and Written Testimonies* throughout the process. We support the GMPC's May 2023 recommendations.

**JOINT RURAL AREA TEAM COMMENTS**

**NOTE: UNRELATED TEXT REMOVED.**

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**Carnation Urban Growth Area Exchange**  
Carnation Urban Growth Area Exchange

Specific Comments

We understand this is a difficult issue. On the one hand the City of Carnation apparently does not support removing the site from its UGA or preserving it from urban uses without having land added to its UGA as a replacement. Such a “swap” would constitute a *UGA Exchange*.

However, we see no reason to create a *UGA Exchange* here, as the County already has robust, time-tested programs in place to handle such issues: *Four-to-One* and *Transfer of Development Rights (TDRs)*. For example, a TDR program could be explored within the City, where TDRs on the property in question could make something else within Carnation denser. This would appear to be a better solution than a *UGA Exchange*, where all proposed properties would have constraints. We support a solution that saves the agricultural use, but does not hurt the integrity of the adjacent Rural Area.

We would like to see this land protected and added to Tolt MacDonald Park that surrounds it on two sides and believe local citizens and the County want this as well, as it makes great sense. However, the idea of a *UGA Exchange* would need to be looked at carefully, as the devil would be in the details and it would need to be very limited as to where and how it might be used. In general, we do not support the concept of *UGA Exchanges* and are concerned about setting a precedent that could harm the integrity of the UGA elsewhere in the County.

**NOTE: UNRELATED TEXT REMOVED.**



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July 13, 2023

Chris Jensen  
Comprehensive Planning Manager  
King County Office of Performance, Strategy and Budget  
401 Fifth Avenue, Suite 810  
Seattle, WA 98104

RE: Draft King County Comprehensive Plan

Dear Comprehensive Planning Manager Jensen:

Thank you for the opportunity to write in support of proposed amendments to the King County's Countywide Planning Policies DP-17 and King County Comprehensive Plan U-185 which clarifies lands adjacent to the city of Snoqualmie's Urban Growth Area are eligible for consideration as part of the King County Four-to-One Program. If approved, these proposed amendments will provide opportunities for the City of Snoqualmie to help meet affordable housing targets, provide visual and ecological protection to the Mountains to Sound Greenway National Scenic Byway on Interstate 90, and conserve high quality open space and recreational lands.

Snoqualmie is a spectacular rural city due to its natural beauty, access to outdoor recreation, convenient location, and family-friendly environment. At the same time, the city needs more affordable workforce housing for area residents.

Amendments to DP-17 and U-185 are critical to allow the city to utilize the King County Four-to-One program for new affordable housing opportunities, open space conservation and other public benefits.

New Four-To-One projects that are allowed along the current UGA and infrastructure improvements will help fund Snoqualmie Parkway improvements such as the much-needed traffic light/roundabout at Southeast 99th street. The current situation at this intersection is dangerous to not only hospital patients but also their employees.

On behalf of the Mountains to Sound Greenway Trust, we will continue to support appropriate design of infrastructure which includes protection of the forested viewshed along the scenic byway, a scenic gateway for the city of Snoqualmie, separated trail connectivity for pedestrians and bicyclists, and land conservation utilizing the Four-To-One program.

Thank you for your consideration.

Sincerely,

Amy Brockhaus  
Deputy Director



July 12, 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 review and comment on the King County Growth Management Planning Council's (GMPC) recommended amendments to the King County Countywide Policies. WSDOT has the following comments on the amendments that will guide future expansions of the county's Urban Growth Area (UGA).

The amendments recommended by the GMPC on May 17 would follow GMPC Chair Constantine's proposal to amend the language across the policies to consistently use the original 1994 UGA line as the baseline for the county's Four-to-One UGA expansion program. However, it would provide two exceptions — one for the City of Snoqualmie and the other for City of North Bend. For these cities, the Joint Planning Areas (JPAs) adopted after the original 1994 UGA was established would be the baseline used for the Four-to-One program instead.

WSDOT supports the use of the 1994 UGA when evaluating UGA expansion requests but does not support making exceptions for select jurisdictions. The exception under consideration comes from the City of Snoqualmie in its October 11, 2022 letter to the GMPC. The city specifically notes that the (currently rural zoned) properties adjacent to the I-90/SR-18 Interchange may be an appropriate area for the UGA to be expanded. As noted in our comment letter provided to GMPC at its January 2023 meeting, WSDOT is constructing a \$188 million upgrade to the I-90/SR-18 Interchange to address performance deficiencies and address community concerns around safety. The interchange was designed to accommodate demand based on the city and county land use plans adopted at the time of design (2019). Allowing the use of the JPAs for the City of Snoqualmie and the City of North Bend will allow higher intensity development up to and around the new I-90/SR-18 Interchange and along I-90 that can result in unanticipated impacts to the investments in the area.

WSDOT is aware that potential urban development is already being studied for some of these areas, should the recommended policies be adopted. For example, a feasibility study was recently conducted for a residential development located directly north of the I-90/SR-18 Interchange at SE 99<sup>th</sup> Street and Snoqualmie Parkway. This study evaluated the construction of 288 units, including 576 bedrooms and 425 parking stalls. While the exact development that would be proposed if the recommended policies are adopted is not certain, we have assessed potential traffic impacts to the new interchange based on existing and projected volumes from the I-90/SR 18 Interchange Justification Report (IJR) analysis before and after development at a similar urban intensity is complete. Based on our analysis, the development and growth that wasn't considered in the IJR analysis could lead to 2045 design year volumes being reached much earlier, significantly increasing delay and congestion at the I-90 ramps and reducing the expected safety and operational benefit over the design life of the project.

Councilmembers

July 12, 2023

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There are numerous examples of the types of development that could be expected at similar locations, adjacent to freeways with convenient access from all directions. For example, five miles east of I-90/SR 18 at the SR 202/Bendigo Boulevard interchange in North Bend, just north of the westbound off-ramp is a shopping center covering approximately 25 acres. A midweek count from June 2013 shows about 315 vehicles entering from the south and 135 vehicles exiting to the south. With growth in volumes on I-90 as well as the surrounding communities over the last 10 years it's likely those numbers are higher today. In comparison to this 25-acre site, the area around the I-90/SR-18 Interchange that could be included in the UGA should the recommended exception be allowed for City of Snoqualmie is approximately 85 acres.

Other key concerns of WSDOT:

- 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.
- 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.

The design and successful operation of WSDOT investments relies on consistency with, and predictability from, the comprehensive plans that cities and counties adopt, including the 20-year land use assumptions. For the City of Snoqualmie and City of North Bend (and all others in King County), areas to accommodate future population and employment growth have already been identified and agreed upon with King County. These are the areas within existing city boundaries and Potential Annexation Areas (PAAs) and are where future growth should be planned for prior to expansions of the UGA.

In closing, WSDOT supports using only the 1994 UGA as the criteria for expansions to the UGA under the Four-to-One program. 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 the investments in the regional and state transportation system serve the users in a safe and efficient way.

Thank you for consideration.

Sincerely,



Robin Mayhew, AICP  
Deputy Regional Administrator  
WSDOT Northwest Region

Enclosure – Attachment A – I-90/SR-18 Interchange Information

cc: Brian Nielsen, WSDOT Northwest Regional Administrator  
Mark Leth, WSDOT Assistant Regional Administrator – Traffic  
Steven Breaux, WSDOT Director of Legislative Relations  
Jeff Storrar, WSDOT Policy Manager

## Attachment A - I-90/SR-18 Interchange Assessment

A feasibility study was recently conducted for a residential development located directly north of the I-90/SR-18 Interchange at SE 99<sup>th</sup> Street and Snoqualmie Parkway that included the construction of 288 units, including 576 bedrooms and 425 parking stalls.

The following provides an assessment of potential traffic impacts to the I-90/SR18 Interchange Upgrade project based on existing and projected volumes from the I-90/SR 18 Interchange Justification Report (IJR) analysis before and after this level of urban development is complete.

As shown in the tables and figures below, the I-90/SR 18 interchange experiences peak directional flows during morning and evening commute periods. During the morning peak, traffic on southbound Snoqualmie Parkway is largely headed to westbound I-90, with smaller amounts heading to SR 18 or eastbound I-90. Traffic heading to northbound Snoqualmie Parkway is roughly split between eastbound (northbound) SR 18 and eastbound I-90, with a smaller amount from westbound I-90. During the evening peak the reverse occurs, with most traffic heading to northbound Snoqualmie Parkway coming from eastbound I-90 and much smaller amounts from eastbound SR 18 and westbound I-90. Traffic on southbound Snoqualmie Parkway is generally heading to westbound I-90 with a slightly smaller amount continuing onto westbound (southbound) SR 18.

### AM Peak

Northbound to Snoqualmie Parkway

- From SR 18 – 40%
- From eastbound I-90 – 48%
- From westbound I-90 – 12%

Southbound to I-90 & SR 18

- To SR 18 – 8%
- To eastbound I-90 – 8%
- To westbound I-90 – 84%

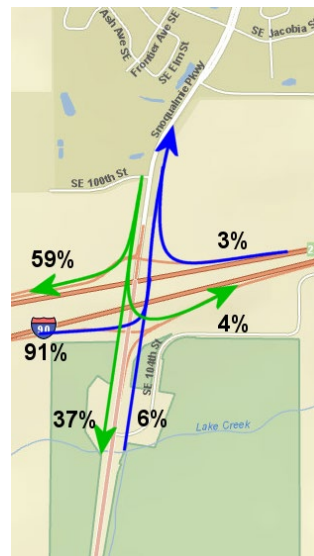
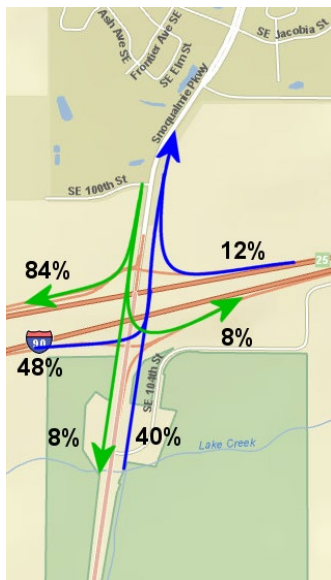
### PM Peak

Northbound to Snoqualmie Parkway

- From SR 18 – 6%
- From eastbound I-90 – 91%
- From westbound I-90 – 3%

Southbound to I-90 & SR 18

- To SR 18 – 37%
- To eastbound I-90 – 4%
- To westbound I-90 – 59%



Based on the I-90/SR 18 IJR analysis, during both the AM and PM peaks the interchange is expected to operate with acceptable levels of service (LOS), queuing, and delay at the

## **Attachment A - I-90/SR-18 Interchange Assessment**

eastbound and westbound I-90 ramps intersections during future interim (2035) and design years (2045).

Two critical movements are highlighted during the PM peak in the above table – eastbound I-90 to northbound Snoqualmie Parkway, and southbound Snoqualmie Parkway to westbound SR 18. Of traffic heading to northbound Snoqualmie Parkway, 91% of it originates from eastbound I-90 and traverses through the interchange. Likewise, 37% of traffic heading from southbound Snoqualmie Parkway continues through the interchange to westbound SR 18. In general, any new traffic generated by development in this area could be expected to follow the same general distribution. As volumes grow, conflicting movements like these compete for signal time additional delays and queues.

In the case of the I-90/SR 18 interchange, development and growth that wasn't considered in the project analysis could lead to 2045 design year volumes being reached much earlier, significantly increasing delay and congestion at the I-90 ramps and reducing the expected safety and operational benefit over the design life of the project.

There are numerous examples of the types of development that could be expected at similar locations, adjacent to freeways with convenient access from all directions. For example, five miles east of I-90/SR 18 at the SR 202/Bendigo Boulevard interchange in North Bend, just north of the westbound off-ramp is a shopping center covering approximately 25 acres. Included here are at least nine restaurants (four with drive-throughs), two drive-through coffee shops, three gas stations (two with convenience stores), a grocery store, and other businesses found in similar developments (bank, auto parts store, vehicle licensing, dry cleaner, etc.). No recent turning movement counts were available, but a midweek count from June 2013 shows about 315 vehicles entering from the south and 135 vehicles exiting to the south. With growth in volumes on I-90 as well as the surrounding communities over the last 10 years it's likely those numbers are higher today. In comparison to this 25-acre site, the area around the I-90/SR-18 Interchange that could be included in the UGA should the recommended exception be allowed for City of Snoqualmie is approximately 85 acres.