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September 26, 2023

King County Growth Management Planning Council
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:

Subject: Comments on GMPC Motion 23-4: Recommending Amendments to Urban Growth Area Policies and Four to One Program for Transmittal to the King County Council.

Send via email to: ivan.miller@kingcounty.gov

Thank you for the opportunity to comment on GMPC Motion 23-4: Recommending Amendments to Urban Growth Area Policies and Four to One Program for Transmittal to the King County Council. In short, we urge the Growth Management Planning Council (GMPC) to recommend that any four to one urban growth area amendments only be added to the 1994 King County urban growth area (UGA).

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

The Washington State Supreme Court has held that an “UGA designation cannot exceed the amount of land necessary to accommodate the urban growth projected by the [State of Washington Office of Financial Management] OFM, plus a reasonable land market supply factor.”¹ In other words, the UGA expansion must be needed to accommodate the County’s documented need for urban growth. “The 2021 Urban Growth Capacity Report finds that urban King County has capacity for over 400,000 housing units and 600,000 jobs. This capacity is sufficient to accommodate the remainder of its 2035 housing and employment growth targets,

¹ *Thurston County v. Western Washington Growth Management Hearings Bd.*, 164 Wn.2d 329, 351 – 52, 190 P.3d 38, 48 – 49 (2008).

and looking ahead, sufficient to accommodate projected future growth during the next planning period.”² So there is no need to expand the UGAs.

The Four-to-One Program was designed to accommodate minor changes to the UGA in return for protecting the rural area and reducing the potential for expanding the UGA by permanently protecting the rural lands adjacent to the expansion. This is reasonable when those expansions are based on the 1994 UGAs. However, when the Four-to-One Program allows expansions based on post-1994 UGA expansions, that principle is lost.

Adding UGA expansions onto UGA expansions creates an urban pattern that is more expensive to serve with public facilities and services, which will generate adverse traffic impacts, and will generate additional greenhouse gas pollution. Given the climate crisis we now face, we should not increase greenhouse gas pollution through unneeded UGA expansions.

Agencies rely on the existing UGA when making public facility investments. Allowing UGA expansions on top of UGA expansions disrupts these investments, increasing costs to taxpayers and ratepayers.

We need to focus growth in our existing cities and towns. Any Four-to-One program expansion should be based on the UGA line adopted in 1994 and not on later additions. We urge the GMPC to recommend that the amendments that would allow expansions based on the post-1994 additions not be adopted.

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

Very Truly Yours,



Tim Trohimovich, AICP
Director of Planning & Law

² 2021 King County Urban Growth Capacity Report p. 7 (June 2021, Adopted Dec. 14, 2021 [Ordinance 19369] Ratified April 6, 2022) last accessed on Sept. 25, 2023, at: <https://cdn.kingcounty.gov/-/media/depts/executive/performance-strategy-budget/regional-planning/UGC/KC-UGC-Final-Report-2021-Ratified.ashx?la=en&hash=38D2E7B9BC652F69C8BB0EA52DB7778F>.