



27 September 2023

King County Growth Management Planning Council  
Chinook Building, Mail Stop CNK-EX-0810  
401 5th Ave., Suite 810  
Seattle, WA 98104

Subject: **Oppose Amendments to Urban Growth Area Policies and Four-to-One Program Based on Post-1994 Additions to UGA**

Dear Growth Management Planning Council Members:

In your consideration of GMPC Motion 23-4, please recognize the urgent need to mitigate climate change through reducing greenhouse gas (GHG) emissions by following the Growth Management Act (GMA) and its focus on reducing sprawl and the number of vehicle trips throughout the urban area. To more effectively address the challenges of the climate crisis, the Sierra Club urges the Growth Management Planning Council (GMPC) to recommend to the King County Council that any four-to-one urban growth area amendments only be added to the 1994 King County urban growth area (UGA).

Both environmental and economic rationale demand that the region focus growth in our existing cities and towns where infrastructure and support services already exist. Therefore, any four-to-one program expansion should be based on the UGA line adopted in 1994 and not on later additions to the UGA in any local jurisdiction.

Enabling future generations to have viable options in a recognizable climate system will require that today's decision makers follow the GMA's focus on reducing sprawl. The GMA is based on long-term land-use and transportation planning agreed to by jurisdictions and area-wide comprehensive planning. Those jurisdictions rely on the existing UGA when making public facility investments. Allowing UGA expansions on top of previous UGA expansions disrupts these investments, increasing costs to taxpayers and ratepayers.

The concerns expressed in the WSDOT letters of July 12 and September 22, 2023 to the GMPC are an example of UGA expansions causing disruptions and potential added expense in facility investments. Higher intensity urban-like development up to and around the I-90/SR-18 Interchange and along I-90 near Snoqualmie and North Bend has the potential to

significantly degrade the safety and performance of the interchange area. WSDOT's I-90/SR 18 Interchange Justification Report did not anticipate additional development up to and around the interchange and assumed the areas would remain rural under the county's zoning. We share such concerns, and urge that the areas in question remain rural under county zoning.

Enabling 4-to-1 projects along the post-GMA-recognized 1994 UGA is the very definition of sprawl. Adding UGA expansions onto UGA expansions creates a development pattern that is more expensive to serve with public facilities and services, as well as generating unnecessary adverse traffic impacts and adding to GHG emissions. This approach enables growth to spiral outwards beyond the areas in which it is supposed to be concentrated and more efficient to service.

Please vote NO on the countywide planning policy amendments that would allow UGA expansions through the 4-to-1 Program on UGA expansions adopted after the 1994 UGA. Instead, recommend to the King County Council that the well-established and recognized 1994 UGA be used as the basis for all future 4-to-1 projects.

Thank you for the opportunity to provide comments on GMPC action regarding UGA policies.

Sincerely,

Tim Gould  
Chair, Transportation & Land Use Committee  
Sierra Club Washington