

Subject: GMA public comment 9/17/09

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To Whom It May Concern:

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LONG RANGE
PLANNING DIVISION

I have two points I would like to make at this hearing. The first regards the recommendation for the Columbia Valley UGA. A few months ago the council voted to rezone 80 acres located on the far west side of the Columbia Valley from Rural Forestry to UR-4. The current recommendations for the Columbia Valley UGA include this parcel. I think that the inclusion of this property makes sense. The current proposal also recommends the inclusion of 80 acres of land north of Limestone Road for a future Light Industrial area. Although these 80 acres are not located in any sewer or water district and is currently zoned rural forestry, I think this inclusion also makes sense.

What does not make sense is that the current PDS proposal recommends the removal of 80 acres centrally located on the east side of the UGA. This majority of this property is prime buildable land, including 35 acres of flat clear land that has until recently been a golf course. This 80 acres parcel is immediately adjacent to property that the sub-area plan committee proposed as a commercial center and close to the proposed community resource center. Unlike the other two 80 acres parcels mentioned, it is highly accessible from Kendall Road it is and it is close to the main sewer and water facilities. Also unlike the other two parcels, extensive recent studies, including wetlands, biological, hydrological, archeological, geological, traffic, and others have verified its suitability for development. There is absolutely no logic to removing this parcel from the UGA.

Not only does it not make sense, it is not fair. This parcel is part of a PUD development that was ^{legally} vested in June of 2005; a development that was designed as a ^{comprehensive} smart growth community and that was designed to bring up the quality of life for the whole area. It was only after it went essentially unprocessed for three years that the applicant scaled back the application to a simple long plat in the hope of obtaining at least some kind of entitlement. At that time it was explicitly expressed was that the applicant's long-term plan was to bring back the PUD along with its various benefits to the larger community. Not only does the application still remain unprocessed more than a year later, now PDS

has recommended that an integral part of that larger vision is be removed from the UGA completely. After four years (five years since the studies PDS asked for were first launched), a person could reasonably assume that PDS is using the GMA process as an excuse to ~~kill the application~~ ^{take the heart out of} ~~than process it~~ ^{rather}. I implore the county council to the right and fair thing and keep these 80 acres in the UGA.

My second point is more general. I think this GMA process has been made more complicated than it needs to be. I do not believe that the GMA planning that is being done is protective of the county. There are clear statements by the GMA hearings board the existence of the various UGAs are not, in themselves, appealable once the appeal periods have passed. Simply downsizing the UGAs does not protect them. On the contrary, it opens them up to fresh appeals. Rezoning the rural areas to R-10 also does not protect the county. On the contrary, it opens it up to a wide range of legal challenges. Yet neither action makes the county GMA compliant. What would make the county GMA compliant is exactly what is not being done, which is (a) making sure that each UGA has ^{compliant} ~~appropriate~~ zoning, principally including mixed use, commercial and parks, (b) creating a county wide capital facilities plan, and (c) using the real population growth numbers provided and verified by Eco-northwest, OMB, ^{OFM} and the Burke report, rather than just making numbers up.

It seems to me that a lot could be accomplished by simply attending to the basic philosophy behind the GMA, which is to make it more appealing for people to build, work, live, and play in urban areas than rural areas. At this point a compelling argument can be made that the process as it is unfolding will lead to exactly the opposite outcome.

Sincerely,

Rob Staveland