July 28, 2011

The Honorable Dow Constantine, Chair and County Executive  
King County Growth Management Planning Council  
c/o Paul Reitenbach  
900 Oakesdale Avenue SW  
Renton, WA 98057-5212

RE: Cascade Bicycle Club comments regarding June 15, 2011 Final Draft, King County Countywide Planning Policies

Dear Chair Constantine and Members of the Growth Management Planning Council:

On behalf of the Cascade Bicycle Club, we appreciate the opportunity to provide public comment on the King County Countywide Planning Policies (CPPs) update. We would like to commend King County and the Growth Management Planning Council on the immense body of work that has supported the update to the King County Countywide Planning Policies. Overall, we are impressed by the June 15th draft of the updated policies, and believe that they will help facilitate a future of sustainable communities across King County.

Cascade Bicycle Club’s mission is to Create Better Communities Through Bicycling. Critical to achieving this mission is the creation of communities that enable bicycling to be a viable mode of transportation and recreation. To this end, we appreciate the County’s commitment through numerous policies to focus growth in urban centers where bicycling, walking and transit can be viable transportation choices.

In addition to the County’s commitment to focusing growth in urban areas, we are encouraged by the policy commitment to bicycling, walking and transit use, ranging from the development of Complete Streets to the siting of public facilities and housing in areas accessible by these modes of transportation. We also commend the County on explicitly identifying the connection between the built environment and public health.

While we support the majority of the recommended policies included in the June 15th draft CPP update, we believe the following policies are of critical importance to establishing healthy, connected, vibrant and environmentally sustainable communities. We have included specific comments regarding each policy, which we strongly encourage the consideration of in the final update and adoption of the CPP policies.

Environment

We support the policies included in the Environment section, specifically EN-16, 17, 18 and 20. We appreciate the County’s commitment to exceeding the greenhouse gas reduction targets and its commitment to encouraging non-motorized modes of transportation within the Environment policies. In addition to the bullet points included in policy EN-16, we would encourage the County to include a commitment to Complete Streets principles and designs.
### Development Patterns

**DP-2** Promote a pattern of compact development within the Urban Growth Area .... The Urban Growth Area will include a mix of uses that are convenient to and support public transportation in order to reduce reliance on single occupancy vehicle travel for most daily activities.

**Comment:** We support this policy however would encourage the County to explicitly identify bicycling and walking, in addition to public transportation, to say: “...will include a mix of uses that are convenient to and support public transportation, bicycling and walking in order...”

**DP-5 Decrease** greenhouse gas emissions through land use strategies that promote a mix of housing, employment, and services at densities sufficient to promote walking, bicycling, transit, and other alternatives to auto travel.

**Comment:** We support this policy and further encourage the County to outline the specific density thresholds needed to support bicycling, walking and transit use.

**DP-6** Plan for development patterns that promote public health by providing all residents with opportunities for safe and convenient daily physical activity, social connectivity, and protection from exposure to harmful substances and environments.

**Comment:** We are encouraged by the integration of public health within the CPPs, and would further urge the County to include active transportation networks within this policy, to say “…opportunities for safe and convenient daily physical activity (for instance, through the provision of active transportation networks)…”

**DP-8** Increase access to healthy food in communities throughout the Urban Growth Area by encouraging the location of healthy food purveyors, such as grocery stores and farmers markets, and community food gardens in proximity to residential uses and transit facilities.

**Comment:** We support this policy and further encourage the County to identify “bicycle and pedestrian facilities” in addition to transit facilities, to say: “…in proximity to residential uses and transit, bicycling and walking facilities.”

**DP-17** If expansion of the Urban Growth Area is warranted based on the criteria in DP-16(a) or DP-16(b), add land to the Urban Growth Area only if it meets all of the following criteria:

- Is adjacent to the existing Urban Growth Area and is no larger than necessary to promote compact development that accommodates anticipated growth needs;

**Comment:** We support this policy and further encourage the County to include “…and can support transportation via modes other than the single occupant vehicle”.

**DP-32** Adopt a map and housing and employment growth targets in city comprehensive plans for each Urban Center, and adopt policies to promote and maintain quality of life in the Center through:
Comment: We encourage the County to include a bullet point within DP-32 regarding the designation of Complete Streets plans within Urban Centers, in addition to a more aggressive strategy for parking management, such as the elimination of minimum parking requirements.

DP-35 Adopt in city comprehensive plans a map and employment growth targets for each Manufacturing/ Industrial Center and adopt policies and regulations for the Center to:

- Facilitate the mobility of employees by transit and the movement of goods by truck, rail, air or waterway, as appropriate;

Comment: We encourage the County to include bicycling and walking in this policy, to say: “...facilitate the mobility of employees by transit, bicycling and walking...”

We fully support the goals and policies of the development patterns chapter as it pertains to the protection of rural areas, specifically DP-45, 46, 49, 50, 51 and 61. We also support the Housing Policies (specifically H-5, 6 & 7) which encourage the location of housing that is accessible to major employment centers for all income levels, while promoting housing development in coordination with transit, bicycle and pedestrian plans.

Economy

We support policy EC-16 and would encourage an additional policy within the Economy section promoting economic activity and vibrancy through the provision of safe bicycle, pedestrian and transit networks and infrastructure. Research has shown the bicycle and pedestrian infrastructure can positively impact local economies and business districts.

EC-19 Support Manufacturing/ Industrial Centers by adopting industrial siting policies that limit the loss of industrial lands, maintain the region’s economic diversity, and support family-wage jobs. Prohibit or strictly limit non-supporting or incompatible activities that can interfere with the retention or operation of industrial businesses, especially in Manufacturing/ Industrial Centers.

Comment: We encourage further specification within this policy of what constitutes an incompatible activity within the Manufacturing/Industrial Center. While the primary land use within these areas may be industrial/manufacturing, it is important that these neighborhoods also provide opportunities for employees to travel by modes other than the single occupant vehicle while also supporting land uses that establish MICs as desirable places to work.

Transportation

We support the majority of the Transportation Policies, specifically T2-6; T8-9; T12-13; T17, 19, 21 & 22. In addition to our comments below regarding specific transportation policies, we would encourage the County to include a policy supporting the use and adoption of a multimodal level of service framework.

T1: Work cooperatively with the Puget Sound Regional Council, the state, and other relevant agencies to finance and develop a multi-modal transportation system that enhances regional mobility and reinforces the countywide vision for managing growth. Use VISION 2040 and Transportation 2040 as the policy and funding framework for creating a system of Urban
Centers and Manufacturing/Industrial Centers linked by high-capacity transit, bus transit and an interconnected system of freeways and high-occupancy vehicle lanes.

**Comment:** We encourage the following changes to this policy to support bicycling and walking as key transportation modes within this vision, while not setting a precedent for the development of interconnected freeways within our urban centers (changes underlined): “…creating a system of Urban Centers and Manufacturing/Industrial Centers linked by high-capacity transit, bus transit, bicycle and pedestrian networks, and an interconnected system of freeways a connected roadway network and high-occupancy vehicle lanes.

**T-19:** Design roads and streets, including retrofit projects, to accommodate a range of motorized and non-motorized travel modes in order to reduce injuries and fatalities and to encourage non-motorized travel. The design should include well-defined, safe and appealing spaces for pedestrians and bicyclists.

**Comment:** We support this policy however encourage the County to strengthen the last sentence to read: “The design shall include well-defined, safe and appealing spaces for pedestrians and bicyclists.”

**T-22** Plan and develop a countywide transportation system that reduces greenhouse gas emissions by advancing strategies that shorten trip length or replace vehicle trips to decrease vehicle miles traveled.

**Comment:** We support this policy and would further encourage the County to develop specific targets for reducing greenhouse gas emissions and VMT through the transportation sector.

**Public Facilities and Services**

In general, we support the policy language within the Public Facilities and Services section, specifically as it relates to discouraging development within the designated rural area of King County. Bicycling, walking and transit use are influenced by land use and development patterns; sprawling land use patterns make bicycling, walking and transit significantly less convenient and therefore less desirable, whereas focused growth in urban centers can enable bicycling, walking and transit to become viable and convenient modes of transportation.

Cascade Bicycle Club supports the County’s proposed policies to locate educational services and facilities that serve urban populations within the Urban Growth Area (PF-18) in locations that are well served by bicycle and pedestrian networks. We also support PF-19, the siting of human and community services that serve rural residents in rural areas.

We take particular interest in school siting given its impact on how children and parents travel to and from school. In 1969, approximately half of all school children walked or bike to or from school; in 2001, less than 16 percent of students (age 5 to 15) walked or biked to school (EPA, 2003). Studies have concluded that the primary barrier to children walking to or from school is travel time and distance (CDC, 2004; EPA 2003), with walking and biking rapidly decreasing as trip time increases. Siting schools within walkable and bikeable distances of the populations that are served is critical as the County seeks to reduce reliance on single occupant vehicles while supporting healthy lifestyles within younger demographics.
We appreciate the opportunity to provide public comments as the Growth Management Planning Council considers adoption of the updated King County Countywide Planning Policies. These policies are paramount for framing a livable and sustainable future for the residents of King County.

Sincerely,

[Signature]

Tessa Greegor
Principal Planner
Cascade Bicycle Club