Bellevue, WA
May 9, 2008

Honorable Mark McClain, Chairman
Honorable Alan Crankovich
Kittitas County
Board of Commissioners
205 W 5th AVE Suite 108
Ellensburg WA 98926

Delivered Via Email for the public record

RE: Comments relating to the Snoqualmie Pass Area and compliance issues on the Eastern Washington Growth Management Hearings Board for (EWGMHB) decision Case 07-1-0004c with specific focus on the recommended Rural Towns recommendation.

Dear Chairman McClain and Commissioner Crankovich:

Congratulations on the Rural Towns designation proposal!

The designation is an excellent starting point from which to protect your important economic and recreational asset— which Snoqualmie Pass and its surrounds represent to Kittitas County, the entire Puget Sound Basin and State of Washington. Its proximity, being less than hour away from one-half of the State’s existing population, offers a proximate alpine recreational setting unique in the United States. It is also one of several emerging economic engines, which are needed to replace those economic sectors in transition in your county. The inherent economic potential to Kittitas County going forward is tremendous. The growth management characteristics set forth in the Rural Towns designation provide your planning staff, economic development interests, the private sector and the Commission with a diverse tool chest with which to build a sound future of value to all public and private interests.

On May 6, 2008 a business operator from the pass testified that over 20,000 people arrive, in a single day, on the pass to partake in recreational and other outdoor activities. This population number is not an unusual occurrence. That amount of transitory population exceeds by almost 3,000 people, the entire population of the City of Ellensburg. It does not require a planning study to conclusively recognize that the existing adopted land use in the comprehensive plan is required just to serve the existing transient population. Existing land use and zoning were determined through an exhaustive eight (8) year land use planning process and study which is thoroughly documented in the SnoPac Plan that has been adopted, in subsequent years on a continuing basis, as a part of Kittitas County’s existing comprehensive land use and zoning plans.
I respectfully request that the entire SnoPac plan, including its maps and documents as well as its narrative, be made a part of this official hearing record for those who, it appears, may not have seen it and/or read it and that your Land Use Advisory Committee be given the opportunity to see the entire document and its maps and consider the thoughtful results of this $250,000 study which also included a very substantial amount of donated and in-kind planning services. It will stimulate their thought processes greatly as they undertake the work contemplated and specified in the propose statement of Rural Town designation for the Snoqualmie Pass area.

I respectfully suggest that the elected officials of the Snoqualmie Pass Public Utility District (SPUD) be consulted regarding their statutory powers and responsibilities as related to legislative mandates for planning boundaries and their legislatively mandated long-range 20 year planning horizon before hardening the language related to boundaries which should, in no case at present, be outside of their existing long range planning boundaries which Kittitas County has reviewed and adopted since the formation of the SPUD in the 1970’s. Any planning work going forward, as specified in the Rural Towns proposal, should be closely coordinated and jointly planned, as the water and sanitary sewer are the most powerful levers for planning, directing, financing and implementing orderly and well-managed growth in Kittitas County and in these Rural Towns. The planning horizons and mileposts of Kittitas County and the SPUD should employ the same time deltas to assure economy and compatibility in obtaining planning and policy results.

The Growth Management Act DOES NOT preclude or restrict Kittitas County from planning for transient population impacts and demands nor does OFM provide you with transient population forecasts for use in GMA planning.

A number of Washington State Counties, especially those impacted by transient populations in eastern Washington, have recognized this population segment as being important in their Growth Management planning. One may easily find many well written examples of this work on the Internet using the search words “Transient Population” and “Washington State” Essentially their planning addresses transient population types and their policy implications. A planner establishes how many are there, now and in the future, where they go, what are they doing and how their presence affects housing stock and supply and the time durations zoning must provide and/or preclude to obtain the desired manifestation of housing stock and its occupancy profile that the county seeks. The first order of business is to obtain realistic transient economic and population forecasts that address this very important population category. It is inextricably interwoven with economic issues such as those, which underpins planning in recreational areas like The Pass. I am aware of no information of this nature
being applied to any proposed land use or zoning changes on Snoqualmie Pass, or if such planning data and information, in fact, does exist.

Current OFM estimated population in the Puget Sound Basin is approximately 3.6 million people. The OFM population estimates for the year 2040, for that same area, is an additional 1.7 million people—5.3 million persons an hour or less away. Recent public policy, promulgated by elected officials in the Puget Sound Regional Planning organization, is to locate almost all of the population increase through 2040 within the four major cities in the four county-region. Land densities will increase substantially with open space and nearby recreational facilities being at a premium. Unless Kittitas is planning to pass a law prohibiting any increase in recreational visitor’s access to The Pass; the current 20,000 daily visitors potential, which has outstripped existing business supply, shall increase substantially. Transient visitors currently represent less than 0.56 of one percent.

Using, for perspective only, a straight-line forty seven (47%) percent population increase to project the same potential daily pass transient visitors (which I do not advocate using as a planning basis without a better understanding of supply and demand functions and related issues) would yield at least a 30,000 daily visitor potential or almost the current 2007 population in all of Kittitas county. Peak recreational days might even rise to 45,000 or 50,000 visitors. There can be no reason, which could justify reducing existing and adopted land use and zoning on Snoqualmie Pass to Rural Residential given this minimal knowledge and information. To do so would be a use of the police power to protect health, safety and welfare in a manner not yet professionally established in any work product in this public record or of any county department staff report if which I am aware. I do not believe any plan or identified administrative decision-making work product for managing existing transitory and future transient populations exists. Notwithstanding clear and apparent increases in transient population impacts inferentially supported by available Washington State Office of Financial Management data. These economic opportunities require the private sector to invest in business and projects to meet the demand and to do so with the cooperation of all local, state and federal agencies and land owners in this recreational wonderland.

I have attached an annotated version of the Rural Towns document that I received late last evening with some suggested changes. I regret that I did not have more time to work on this matter. Again congratulations on this approach!

Best Regards,
Michael L. Darland
Cc. Mr. Jim Platt
     Mr Doug Nicholson
     Ms. Catherine Clerf
     Mr. Scott Turnbull – to file and Clerk for Hearing Record
Rural Towns

Purpose and Intent
Rural Towns are unincorporated towns governed directly by Kittitas County.

The Rural Town designation recognizes that transient population must be accounted for in established communities that have developed to serve tourist, recreational, full and part-time residential and vacation homes, and agricultural community needs.

The purposes of the Rural Town designations are to recognize existing concentrations of higher recreation and residential densities, and economic activity in Rural Areas. These Rural Towns may include historical rural settlements, re-designation of an urban commercial center, and/or designation of existing, expanding, or developing recreation centers that provide a physical focus for the identity of the rural communities. The Rural Town may allow for modest growth of full time residential use, growth in recreation use, including vacation homes, fractional ownerships and a broad range of rental properties and lodging facilities, and growth in economic uses within these designations if adequate utilities and other public services are available.

While higher-density development in Rural Towns may require public-type services, applying the full range of urban development standards (e.g. street improvements or landscaping) would not be necessary, and may not be consistent with the character of these communities. Although Rural Towns also may in some circumstances develop at densities similar to those in the Urban Growth Areas they are considered part of the Rural Area for purposes of the GMA and do not provide significant growth capacity for full time residents.

Policies
Kittitas County hereby designates Snoqualmie Pass, Easton, Ronald, Thorp and Vantage as unincorporated Rural Towns. These settlements have continued to grow as they have been designated a urban area for the last ten years. The Rural Towns in unincorporated Kittitas County should provide services and a range of housing choices for Rural Area full and part time residents. The boundaries of the designated Rural Towns are shown on the Comprehensive Plan Land Use Map. Adjustments to these boundaries shall only occur through a sub area planning process, and shall not allow significant increases in development potential outside of these designated boundaries. At this time no additional new Rural Towns beyond those listed above are needed to serve the Rural Area.

Within 90 days of the adoption of this land use designation the Land Use Advisory Committee (LUAC) shall forward recommendations to the Board of County Commissioners regarding zoning categories, allowable uses,
development criteria, design standards, and density limitations within each of the Rural Towns. In doing so the LUAC shall consider the following:

- Existing and Historical Use;
- Character of the Rural Town;
- Use of innovative planning techniques including but not limited to Cluster Development, Compact Development, Multi-Use Development, Zero Lot line Development, Low Impact Development and Planned Unit Developments;
- The use of Rural Towns as receiving areas for a Transfer of Development Rights program;
- Availability of public services and their existing service areas including sewer, water, transportation, police and fire.

- Existing and forecasted transient population characteristics including their absolute numbers, average and peak numbers in both peak and off-peak seasons and their food, shelter and sanitary requirements and potential requirements.
- Identify the cooperative assistance which can be provided by local, state and federal agencies who, though their statutory mission, mandates and land holdings can further the recreational and economic potential of these Rural Towns to enhance the immediate replacement of lost industry and jobs in Kittitas County by capitalizing on the natural assets and attributes of these Rural Towns that have been identified by the market as desirable destinations for transitory populations within the greater Pacific Northwest.

Commercial and industrial development that provides employment, shopping, community and human services that strengthen the fiscal and economic health of rural communities should locate in Rural Towns if utilities and other services permit.

Rural Towns may contain higher-density housing than permitted in the surrounding Rural Area, and should provide affordable and resource-worker housing if utilities and other services permit. Development density in Rural Towns may approach that are achieved in urban areas.

Rural Towns serve as activity centers for the Rural Area and may be served by a range of utilities and services, and may include several or all of the following land uses, if supported by necessary utilities and other services and if scaled and designed to protect the surrounding lands and their rural character:

- Retail, commercial and industrial uses to serve the surrounding Rural Area population and to provide support for resource industries, recreational activities and tourism;
- Residential development, including single-family housing on small lots as well as multifamily housing, transient housing as defined in the Commercial – Lodging land Use Code category to include fractional ownerships and a wide variety of rental housing and lodging types as defined therein and mixed-use developments;

ML. Darland comments on The Rural Town designation — Page 3 of 4
c. Other commercial and industrial uses, including commercial recreation and light industry; and

d. Public facilities and services such as community services, churches, schools, and fire stations.

Rural Towns may already be served by urban levels of utilities including water and sanitary sewer. Established service area boundaries shall be included within the Rural Towns. Where Sanitary Sewer service areas do not currently exist sewers or innovated sewer disposal techniques may be developed in Rural Towns if necessary to address water quality and public health concerns which cannot be addressed by other methods, provided that any extension of sewer mains from urban areas to serve a rural town shall be “tight-lined” systems designed not to serve any intervening lands. All alternatives shall be exhausted before sewers from urban areas are extended to Rural Towns. Rural towns shall not be enlarged to facilitate provision of sewers.

Rural Towns should be compact, promoting pedestrian, public transportation, alternate motorized and non-motorized travel while permitting automobile access to most commercial and industrial uses. New development should be designed to strengthen the desirable characteristics of the town, be supported by necessary public facilities and services, and be compatible with nearby rural resources. New industrial uses should locate where they do not disrupt pedestrian or bicycle traffic in established retail areas of town or conflict with residential uses.

**Designation Criteria**

Criterion 1. The Rural Communities of Snoqualmie Pass, Easton, Ronald, Thorp and Vantage shall be designated unincorporated Rural Towns.

Criterion 2. The former Urban Growth Node Boundary shall be utilized as the outer boundary of the Rural Towns with the following exceptions:

- Snoqualmie Pass – Only the area currently within the service area boundary of Snoqualmie Pass Utility District (SPUD)
- Easton – Only those areas located within the existing service area boundary of the water utility
- Ronald – The former UGN boundary and areas served by established water utilities.

**Density**

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Density should reflect the existing development patterns and may provide for increased density associated with recreational uses and recognize the population served may be of a temporary, part time, recreation or vacation use that is not captured through the normal population projections of the Growth Management Act.

Density should reflect the availability of services to be provided.

Until such time action is taken by the Board of County Commissioners regarding the LUAC recommendations required above, the existing adopted comprehensive plans underlying land use and the underlying zoning designation of the rural towns shall be rural residential except those areas already zoned as the various code categories of Commercial, Industrial, Planned Unit Development or were designated with a higher density prior to the adoption of this Comprehensive Plan.

Until such time action is taken by the LUAC and the Board of County Commissioners regarding the LUAC recommendations required above, existing land use and zoning shall remain unchanged including that which is associated with and is the underlying basis of all pending plat applications which have satisfied all of the requirements of KCC 16.12 (Preliminary Plats) and KCC 17.36 (Planned Unit Development Zone) and other similar platting requirements and are complete applications subject to further processing.
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