



P.O. Box 320 • 22035 SE Wax Road • Maple Valley, WA 98038

Phone: 425-413-8800 • FAX: 425-413-4282

December 26, 2007

**LINDA DOUGHERTY  
DIRECTOR, ROAD SERVICES DIVISION  
KING STREET CENTER  
MAIL STOP:KSC-TR-0313  
SEATTLE, WASHINGTON 98104-3856**

**Re: City of Maple Valley Comment On Determination of Nonsignificance for Proposed Sale of Summit Property**

Dear Ms. Dougherty:

The City of Maple Valley disagrees with King County's Determination of Nonsignificance ("DNS") for the Proposed Sale of the Summit Pit, or Donut Hole Property. As discussed further below, the sale of this property is part of a larger proposal that will clearly have probable significant environmental impacts requiring analysis in an Environmental Impact Statement ("EIS"). The City, therefore, requests that the County withdraw its DNS and prepare an Environmental Impact Statement ("EIS"). Further, the City renews its offer to the County to participate as co-lead agency for SEPA review.

**A. The Proposed Sale is Part of a Larger Proposal**

The proposed sale of the Donut Hole is part of the larger proposal that King County initiated in King County Ordinance 15856. That Ordinance lays out the following various components: (1) relocation of the existing facilities on the Donut Hole property, (2) sale of the property to Yarrow Bay for purposes of development of affordable housing and acceptance of density through a transfer of development rights ("TDRs"), (3) County acquisition of property along Icy Creek, and (4) annexation of the Donut Hole by the City of Maple Valley.

WAC 197-11-060(3)(b) requires that that "proposals or parts of proposals that are related to each other closely enough to be, in effect, a single course of action shall be evaluated in the same environmental review." This regulation further explains that proposals are "closely related" and must be discussed in the same environmental document if they are "interdependent parts of a larger proposal and depend on the larger proposal for their justification or implementation." WAC 197-11-060(3)(b)(ii). Ordinance 15856 expressly justifies the proposed sale of the Donut Hole property, and in particular the sole source nature of the sale, by all of the various other components of the proposal. Thus, the proposed sale is an interdependent part of a larger

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proposal and the environmental document and review must evaluate the larger proposal, not just the sale.

**B. When Properly Defined the Proposal Will Have Probable Significant Adverse Impacts**

There is no question that the proposal as defined in Ordinance 15856 will have probable significant adverse impacts. The County Executive has already proposed a comprehensive plan amendment that proposes significant densities to further the goal of housing identified in the Ordinance. This level of density in this location would have significant impacts on traffic, other services, and the existing land uses in the surrounding area.

For example, the City has prepared some preliminary volume and distribution forecasts based on the County's proposed densities. These preliminary forecasts indicate that the County's proposal could increase traffic on State Route 516/Kent Kangley Road by as much as thirty-five percent. The forecasted increase for Witte Road SE is even higher and could reach up to fifty percent. The City's adopted 2005 transportation elements as well as the adopted 2001 Witte Road Corridor Study do not suggest widening Witte road in order to construct additional travel lanes. This is mainly due to the topographic and environmental constraints along this road. This type of impact needs to be carefully considered. Such analysis is particularly important given the difficulty in mitigating some of these impacts and the absence of County planning or funds to do so.

Another example is the impact on City park facilities. The increased densities if this land is redesignated as urban, and rezoned to R-8 as the County has currently proposed, will result in higher demand for parks and potentially lower levels of service which is a clear conflict with City goals and objectives. There is already a deficit of such facilities and services in the City, in part resulting from the County's history of urban designations, resulting densities, and managing the surrounding urban areas prior to City incorporation.

**C. The City Again Offers to Work with the County as Co-Lead Agency On An EIS**

For the reasons discussed above, the County should withdraw its DNS and issue a Determination of Significance and prepare an EIS to evaluate the entire proposal, as discussed above in Section A. Earlier this year, the City proposed to the County a joint planning structure in which the City and County would work together as co-lead agency to conduct the environmental review for the Donut Hole. The County has not accepted the City's offer. The City would again like to extend its offer to serve as co-lead agency.

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Very truly yours,

Laure A. Iddings, Mayor

cc: Anthony Hemstad, City Manager

Maple Valley City Council

Christy A. Todd, City Attorney

Ron Sims, King County Executive, 701 Fifth Ave, Suite 3210, Seattle, WA 98104

King County Council

Leonard Bauer, Managing Director, Growth Management Services, Washington State  
Department of Community, Trade & Economic Development (CTED)