

Doug McIntyre

From: Murphy, Michael F <Michael.Murphy@kingcounty.gov>
Sent: Monday, July 27, 2020 3:48 PM
To: EIS
Cc: Doug McIntyre
Subject: EIS Scoping Comment
Attachments: SammPubComm_MMurphy_KingCoTDR_20200727.pdf

[CAUTION - EXTERNAL EMAIL]

To whom it may concern – please find attached comments on the scope of an EIS related to proposed amendments to the Sammamish Comprehensive Plan and Municipal Code (Agency File Number POL2020-00331).

-Michael Murphy

Michael Murphy

Transfer of Development Rights and In Lieu Fee Mitigation

Water and Land Resources Division, Department of Natural Resources & Parks

(206) 477-4781

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Doug McIntyre, Transportation Planner

City of Sammamish

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RE: Public Comment Agency File Number POL2020-00331

July 27, 2020

Mr. McIntyre,

I understand the City of Sammamish will be considering amendments to its comprehensive plan and associated amendments to Sammamish Municipal Code sections 14 and 21A. Please accept these comments on the scope of an Environmental Impact Statement the City will complete to review proposed amendments to the City of Sammamish Comprehensive Plan (Public Comment Agency File Number POL2020-00331).

As you and others at the City draft and review the comprehensive plan amendments, I urge you to review how proposed changes might affect the City's ability to accommodate new growth in the City, as well as how revised policies affect conservation outcomes of benefit to City residents and residents of the region. In particular, please carefully consider how potential policy and code changes may affect the future potential for the City to accommodate transfers of development rights (TDR).

The transfer of development rights is a policy tool which results in permanent conservation of rural and resource lands, simultaneously promotes urban growth in the right places, and provides ancillary benefits consistent with most of the goals of the Growth Management Act (see RCW 37.70A.020, goals 1, 2, 6, 8, 9, 10 and 12). Since its inception in 1999, the King County TDR program has recorded conservation easements permanently conserving nearly 145,000 acres across the County – nearly 10 times the area of the City of Sammamish. The City's current Comprehensive Plan has policies to accommodate TDR and recognizes such transfers can advance the City's environmental goals (see Sammamish Comprehensive Plan policies EC1.18 and EC1.20).

As you may be aware, the City of Sammamish and King County have an interlocal agreement (ILA) regarding the transfer of development rights from rural lands in unincorporated King County into Sammamish Town Center. Since the ILA was signed in 2011, King County has protected 352 acres in the "Emerald Necklace" surrounding the City and sold 22 TDRs to a prospective Town Center developer for total sales revenue of \$1,760,000. Per the terms of the ILA, King County has transferred one quarter of

the total sales revenue (\$440,000) to the City to use for new open space amenities to ensure residents in Town Center continue to have access to open space near where they live.

If updates to the City's Comprehensive Plan and code support and promote future TDR sales to Sammamish Town Center developers, the City, its residents, and the environment would benefit – both from the City's use of future shared revenue and also through the County's use of future revenues to conserve even more land in rural areas around Sammamish and across the County. With respect to allowed uses of TDR sales revenue shared with the City, King County is open to discussions about amending the terms of the ILA to allow alternate uses for shared revenue, such as contributing to transit and transportation improvements.

One of the primary ways to support continued transfers of development rights, the associated conservation benefits to the residents of Sammamish and King County, and future revenue to the City – is to support planned growth in Sammamish Town Center. Without the demand (i.e. ability for developers to use TDRs), transfers of development rights will not continue, and neither will the associated benefits. Please consider the effect of Sammamish Comprehensive Plan policies will have on the future viability of TDR.

Thank you for considering these comments. I would be happy to answer any questions or discuss details of the ILA. I can be reached at Michael.murphy@kingcounty.gov, or by phone at 206-477-4781.

Regards,

Michael Murphy

Transfer of Development Rights Program Manager
King County Department of Natural Resources and Parks