



**Washington State
Department of Transportation**

Olympic Region
7407 31st Ave NE, Lacey
P.O. Box 47440
Olympia, WA 98504-7440
360-357-2600 / Fax 360-357-2601
TTY: 1-800-833-6388
www.wsdot.wa.gov

November 16, 2022

Ms. Amelia Schwartz, Associate Planner
Thurston County Community Planning and
Economic Development
2000 Lakeridge Drive SW
Olympia, WA 98502

Dear Ms. Schwartz:

The Washington State Department of Transportation (WSDOT) appreciates the opportunity to review the draft Grand Mound Subarea Plan.

WSDOT commends the County's effort to review current and future growth and ensure the transportation system is efficiently serving local and regional growth projections. However, WSDOT is concerned with the eight site-specific land use and zoning change requests that, collectively, would expand the Grand Mound Urban Growth Area (UGA) by 171 acres. As detailed below, WSDOT believes that these UGA expansion requests may lead to inefficient land use patterns and require high levels of vehicle travel that impact state highways in the Grand Mound Subarea.

WSDOT supports policies and plans that accommodate projected urban growth in a compact land use pattern. Such land use patterns are a key step in minimizing up-front capital costs and ongoing operation and maintenance costs for all components of a multimodal transportation system. At the same time, unsupported UGA expansions do not align with principles of compact, urban, transportation-efficient development.

As detailed in the Thurston Region Planning Council's *Buildable Lands Report* (June 2021), the current Grand Mound UGA contains 982 acres comprised of both developed and undeveloped land. The *Buildable Lands Report* provides the following estimates for land capacity and demand over the 20-year planning period (2020 to 2040):

- Residential Development: Table 3-3 indicates a projected demand for 290 units with capacity for 370 units in the current UGA. There is excess residential capacity for 80 units (22 percent).
- Commercial, Industrial, and Mixed-Use Development. Tables 4-3 and 4-4 indicate future demand of 33 acres with a supply of 249 acres in the current UGA. There is excess non-residential capacity of 216 acres (550%).

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In short, the available market-based evidence does not support a need for expanding the Grand Mound UGA.

WSDOT believes that any expansion to the Grand Mound UGA has the potential to generate substantial vehicle traffic in the vicinity of US 12 and I-5. In particular, the proposed UGA expansion on both sides of I-5 (29 acres of residential and 67 acres of industrial development west of I-5; 75 acres of commercial development east of I-5) can be reasonably foreseen to increase vehicle traffic through the I-5/US 12 interchange. Given the lack of network connectivity across I-5 via local roads, the UGA expansions may degrade multimodal system performance on the state highway system.

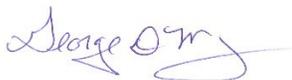
WSDOT appreciates inclusion of information from various transportation planning efforts. However, the eight site-specific land use and zoning change requests were not included in prior transportation analysis for the Grand Mound Subarea.

WSDOT requests that the Transportation Element for the Comprehensive Plan, including the Grand Mound Subarea Plan, be updated to reflect the proposed UGA expansion, assuming full buildout at maximum allowed densities. WSDOT is particularly interested in empirical evidence meeting the requirements of RCW 36.70a.070(6), especially the following:

- “Estimated traffic impacts to state-owned transportation facilities resulting from land use assumptions...”
- “Specific actions and requirements for bringing into compliance locally owned transportation facilities or services that are below an established level of service standard.”
- “Forecasts of traffic for at least ten years based on the adopted land use plan to provide information on the location, timing, and capacity needs of future growth.”
- “Identification of state and local system needs to meet current and future demands...”

Thank you again for the opportunity engage in the planning process in reviewing the draft Grand Mound Subarea Plan. We look forward to continuing our productive partnership.

Sincerely,



George Mazur, P.E.
Multimodal Planning Manager

GM:yl

cc: Kaitlynn Nelson, Thurston County Community Planning
Andy Nelson, WSDOT Olympic Region Development Services
Keri Sallee, Washington State Department of Commerce