

From: [Rod DeWalt](#)
To: [Policy Staff, Council CompPlan](#)
Subject: SeaTac Noise Impacts
Date: Thursday, December 7, 2023 12:22:23 PM

I believe FAA and Port of Seattle should be responsive in mitigating aircraft NOISE IMPACT to Designated Rural community ... I would like to see King County use its standing to disperse the laser guided traffic pattern that bring non-remitting aircraft noise middle of Vashon's most densely occupied areas.... Simply moving the traffic 1 mile to the Ease over open water of Puget Sound would reduce noise impacts by 50% Come On Dow, take on the Feds and Port for the good of Vashon Island .. We are hear !!! DR DeWalt

Sent from my iPhone

From: [Matulovich, Matthew \(DNR\)](#)
To: [Policy Staff, Council CompPlan](#)
Subject: North Bend lots
Date: Friday, December 8, 2023 1:52:15 PM
Attachments: [image001.png](#)

Comp Plan Staff-

You are proposing changes to a few DNR lots as part of the comp plan.

Parcels, 0823089030, 0823089046, 0823089047, 0823089050 RA(Rural Area) to OP("Other Parks and Wilderness" what is op) (or RA5 to RA10) Parcels are about 6 acres.

I understand the change from RA5 to RA10 I do not understand the change from RA to OP, what are the ramifications of this change? Thanks.

LOT 2 KCBLA #BLAD14-0020 REC #20160113900001 SD BLA BEING POR NW 1/4 STR 08-23-08 LESS TDR'S PER REC# 20170718000691

LOT 3 KCBLA #BLAD14-0020 REC #20160113900001 SD BLA BEING POR NW 1/4 STR 08-23-08 LESS TDR'S PER REC# 20170718000691

LOT 4 KCBLA #BLAD14-0020 REC #20160113900001 SD BLA BEING POR NW 1/4 STR 08-23-08 LESS TDR'S PER REC# 20170718000691

LOT 5 KCBLA #BLAD14-0020 REC #20160113900001 SD BLA BEING POR NW 1/4 STR 08-23-08

MVM



Matthew V. Matulovich

Transition Lands Planning Manager
Strategic Planning – Acquisitions & Divestitures
Washington State Department of Natural Resources
Cell: (564) 669.0897

www.dnr.wa.gov

From: [Jensen, Chris](#)
To: [Policy Staff, Council CompPlan](#)
Subject: FW: Comments on the County's Plan
Date: Tuesday, January 2, 2024 3:31:41 PM
Attachments: [image001.png](#)

Chris Jensen – [they/them](#)

Comprehensive Planning Manager

King County Executive Department | Office of Performance, Strategy, and Budget

[Sign up](#) for email updates about the 2024 King County Comprehensive Plan Update.

From: Compplan Sepa <compplan.sepa@kingcounty.gov>
Sent: Wednesday, December 27, 2023 2:28 PM
To: Jensen, Chris <Chris.Jensen@kingcounty.gov>
Subject: FW: Comments on the County's Plan

From: Diane Pottinger <dianep@northcitywater.org>
Sent: Tuesday, December 12, 2023 2:46 PM
To: Compplan Sepa <compplan.sepa@kingcounty.gov>
Subject: Comments on the County's Plan

[EXTERNAL Email Notice!] External communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

To whom It May Concern.

In reviewing Appendix, A, Section I Capital Facilities, C Capital Facilities Inventories and Planning, 2 Facilities provided by other public entities.

The table of public water systems on page A-7 is missing our utility, North City Water District. We had previously been known as Shoreline Water District during the County's last water system plan but changed our name effective 1/1/2014. It was approved by Ordinance 19266 was approved on 4/15/2021.

We would appreciate getting it corrected in the final Comprehensive Plan.

Thank you.

Diane Pottinger, P.E.
District Manager



1519 NE 177th Street | Shoreline, WA 98155
p. 206.362.8100 | f. 206.361.0629

This e-mail message is a public document and may be subject to public disclosure if requested by another party.

From: [Ilse](#)
To: [Policy Staff, Council CompPlan](#)
Subject: Comprehensive Plan
Date: Wednesday, December 20, 2023 2:41:23 PM

All I can say is, that nothing will change in King County and perhaps other counties until we get rid of the liberal people in our government that are govern us which came from outside of our state and brought their liberal ideas to us.

We have for the most part been a Democrat run State, but is has never been the way it is now. If I were younger I would give it a try, but it is time for me enjoy my life. Instead I have to constantly get upset how politicians are trying to turn Washington into California. It is really sickening.

Ilse ,. ' ** . '"") , . **") ** The day we lose our will to fight is the day we lose our freedom. GOD BLESS AMERICA

From: [Arletta VanHoof](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: King County Council Review of 2024 Comprehensive Plan
Date: Thursday, December 21, 2023 8:08:12 AM

Hello,

Two points that stick out to me in your latest email concerning the King County Council Review of 2024 Comprehensive Plan are the following;

- protection of working farms and forests; and
- access to clean water, clean air, and a healthy environment.

In the past I have tried to work with our rep and was dropped and abandoned with absolutely nothing done with the issues we have been dealing with for over 25 years on the Kuzak Rd in Enumclaw. As soon as things get tough the council folds and only deals with issues that catch the voting public eye. It is so disappointing that in rainy months a king country “dirt” road is allowed to have heavy haul traffic to pollute our streams and in the dry times pollute our air. No one cares that 9 months out of the year we drive through literal 1’x2-3’ pot holes with areas that have eroded away, while dodging fully loaded heavy haul trucks driving either down the middle or on the actual “wrong” side of the road. Every neighbor has had near death experiences with this situation. Or that those pot holes restrict emergency services getting to homes in a timely manner to save lives. But hey, what’s a life compared to \$\$\$ and votes? What’s someone’s health compared to \$\$\$ and votes? And last but certainly not least what’s the environmental breakdown worth compared to \$\$\$ votes? I know I sound harsh and I know there are eye rolls whenever I email but any one of you would feel the same if you have ever had to deal with this kind of situation for 25+ years. Why don’t you come and drive on the Kuzak while trucks are running and while the pot holes are in full affect.

This plan is more than likely for areas that only stand out to the public eye and a slap in the face to those of us that have pleaded with you for years for help.

Arletta VanHoof
Sent from my iPhone

From: [Comcast](#)
To: [Policy Staff, Council CompPlan](#)
Subject: Small Businesses
Date: Wednesday, December 20, 2023 6:38:02 PM

It has come to my attention that some new small businesses are waiting a year or more for permits. This is completely unacceptable and resources need to be allocated to getting new small businesses up and running as fast as possible. Very best -Jennifer Gellner

Sent from my iPhone

From: [Michael Williams](#)
To: [Policy Staff, Council CompPlan](#)
Subject: 2024 Comprehensive Plan
Date: Wednesday, January 10, 2024 12:17:14 PM

Please consider changing the maximum ADU size to 1,500 sq ft from 1000 sq ft. and updating the building code from the 2018 edition to the 2021 edition (ICC). This will ensure new buildings adopt building practices that will use less energy and have a smaller carbon footprint.

Michael Williams
m095733w@gmail.com
North Bend, WA
425 213 3024

From: [C.Gregory](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: Water Wells
Date: Friday, January 12, 2024 3:33:26 PM

Hello,

King County is the ONLY county in the state that requires 5 acres of land to drill an exempt water well on their property. Why is that? This should change to match what most other counties require, which is to meet Dept of Ecology's setbacks. King county does NOT require 5 acres for an irrigation well though, which is the exact same well construction, only the name changes. The people of king county should be able to exercise their right to water on their property, while meeting DOE's setback requirements.

Thank you,

From: [mike birdsall](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: SVNE Subarea Plan comments
Date: Tuesday, January 16, 2024 6:08:17 PM

Hello. I am submitting comments today by email, as a backup to my planned testimony at tomorrow's committee meeting. This is due to the risk of an ice storm tonight in my area, and a potential loss of power that would thwart my planned testimony. Testimony follows:

My name is Mike Birdsall. I am a member of the Joint Rural Area Team of ten organizations, and I serve as its Transportation Technical Consultant. I have decades of experience helping cities and counties to prepare transportation plans under the Growth Management Act. I am here to discuss the SVNE Subarea Plan on behalf of the Joint Team.

Other Joint Team members participated with county staff in developing the land use and environmental portions of the Subarea Plan. Those elements are well done, due in part to extensive engagement of members of the Public. Findings of the Subarea Plan strongly support and echo Joint Team concerns for protection of the Rural Area, Agricultural lands, and Forest lands with a priority on sustaining a healthy rural ecosystem and lifestyle, and no increase in urban lands, or urban-serving businesses.

That said, we are disappointed in Chapter 8 (Transportation) for its lack of useful information. Although transportation conditions in the SVNE Subarea are going from bad to worse, the Public Review Draft released last June was just six pages of boilerplate with no substantive information. I objected to that last summer, but this current version remains unchanged. There is still no substantive identification of tangible transportation issues let alone discussion thereof. My comments submitted last summer gave extensive direction for the type of additional substantive information needed. I don't know why no changes were made to improve the current version. The current Vashon Subarea Plan has a much more detailed Transportation Chapter, while covering a smaller, less complex area. The difference is striking.

My extensive comments last summer remain valid. They were submitted then as an independent observer, but the Joint Team is in full agreement. Therefore, the Joint Team will be **re-submitting** those same comments in its detailed Written Comments. We hope to see substantial expansion of this chapter *before* it is adopted later this year.

Mike Birdsall

Joy to the world, the Lord is come!

From: [Samantha Fernald](#)
To: [Policy Staff, Council CompPlan](#)
Subject: Comment on Ordinance 2023-0439: D. Fall City Subdivision Moratorium Work Plan Report
Date: Tuesday, January 16, 2024 12:29:46 AM

I feel frustrated by the suggested P-Suffix Regulation amendments. These suggested amendments, would make it so only 1-off houses could be built, not neighborhoods. This means only someone with a lot of money could afford to develop a lot or a builder who in order to make a profit, would need to build a premium house then sell it for an incredibly high price.

The reasons restricting all affordable neighborhoods in Fall City frustrates me:

1. King county has a homelessness crisis. From my reading, the number 1 cause of homelessness in the United States is high housing costs (which King County has). This is because people are unable to save the money needed to weather unemployment, from a layoff or mental health crisis. In the Snoqualmie Valley subarea plan, taking better care of those suffering from addiction or a mental health crisis was mentioned to be a priority. Building more housing helps bring down the price of housing which helps those suffering, be able to continue to afford their house payments and use a lesser percentage of their income on housing.
2. King County has a problem with there not being enough housing in general and there not being enough affordable housing. From what I've read, the number 1 cause of not enough affordable housing being built, is restrictive zoning laws like the P-Suffix Regulation amendments. The United States has a problem with older, typically white, upper-middle income individuals saying "I don't want housing being built here, that should be the town next to me's problem." This makes me angry because to fix the lack of housing issue, housing needs to be built somewhere, it can't just always be the next person's problem. It also makes me angry because older affluent people are advocating for policies that raise their property value at the expense of families and younger generations not being able to afford a home.
3. This year when I went to vote, I read about both candidates for the Snoqualmie Vally School Board. In their campaigns, an issue mentioned was that Fall City Elementary needs to be rebuilt to ensure a safe and quality education for students. However, it was stated that the millions of dollars needed to achieve this would be more difficult to get, due to declining enrollments at the school. Fall City Elementary is the school in the catchment area for my house. I want children in the future and I will want them to go to a school that's safe and has the resources to provide a great education. When I purchased my home, people close to me, tried to dissuade me from buying in Fall City because of the elementary/middle school available. I'd love for the schools to have a better reputation in the years ahead. An increase in housing would increase enrollments and money for the schools to improve.
4. I feel confused by vaguely worded concepts in the Fall City Subdivision Moratorium like increase lot size to preserve "rural character". Being blunt, it seems like lot size is just being increased to the point where a builder couldn't afford to build any sort of neighborhood especially considering septic suggestions. From what I see, when walking around Fall City, all the houses built from 1880-1940 are built very close together with the house taking up a large part of the lot. This leads to me to feel confused about what aspect is actually being preserved? I think humans have a tendency to just see anything past 50 years ago as history. They don't realize what we do now is history and homes

from 1880,1950, 1980, 2020 all mixed together will tell a new story to future generations. In addition, I don't think we should be building housing in accordance to how the financially well-off Victorians were building. In that era it was acceptable for all the children to sleep in one room, for the kitchen to be completely shut off at the back of the house, that way the women cooking, didn't disturb the men, there was no need for an office to work from home. This isn't the average persons housing needs now, so why should we adhere to past expectations when building today.

5. I feel frustrated that King County isn't providing Fall City residents with better access to data on what is causing the lack of housing and affordable housing. When I attended meetings about the moratorium last year, many people complained about the cost of housing in Fall City then said they didn't want anymore housing to be built. I feel these values are contradictory based on what I've looked into. Most people at these meetings said they felt Airbnb/vrbo was the only cause of high housing prices. But in research done where Sydney Australia was used, it was found that out of every \$100 increase in housing price, vacation rentals were only responsible for \$20 of it. In addition, in this study ADUs and people renting out their full house when away, were counted as housing that could be used as a traditional rental property instead, which I personally have mixed feelings on. Also, Fall City likely doesn't have the vacation demand Sydney does, so I suspect that in Fall City, vacation rentals are even less the predominant cause of lack of affordable housing.
6. King county struggles with having enough affordable rental properties especially during summer. When I attended meetings about the moratorium, a 60+ year old woman spoke. She said she was a retired teacher and owned 3 rental properties. She complained about having to raise rates, due to high property taxes and needing enough money to live off of in retirement. She did think high property taxes in Fall City were due to vacation rentals which isn't accurate. This frustrates me; a single teacher or perhaps even two teachers, couldn't afford to rent or purchase a home in Fall City now. When I voted this year, and was looking at the candidates for Snoqualmie Valley Hospital, they mentioned that many of the nurses/admins at the hospital have to live in Kent/Renton, commuting a long distance because they can't afford to live in this area.
7. In the sub-area plan meetings I attended, people mentioned a fear of Fall City becoming like Renton. Recently, I bought a second home in Port Orchard. Port Orchard has many neighborhoods and is actively building new ones to meet housing demands but it still feels rural and quaint. Fall City can have more neighborhoods and still feel like that. It doesn't have to go from rural to completely urban. It's not all or nothing. Unfortunately, the P-Suffix Regulation amendments seem as they would prevent any new neighborhoods, furthering our housing crisis, and leading to less money for essential Fall City needs.

Thank you for your time.

Spencer Lau, Jr.
4550 38th Ave SW, Apt 427, Seattle, WA 98126
Email: spencer@wccda.org

King County Local Services and Land Use (LSLU) Committee

Council Member Sarah Perry, Chair
Council Member Girmay Zahilay, Vice-Chair
Council Member Reagan Dunn
Council Member Teresa Mosqueda
Wednesday, January 17, 2023
9:30 AM

Support of Proposed Ordinance No. 2023-0440 - related to comprehensive planning

Dear Chair Perry and LSLU Committee Members:

My Name is Spencer Lau, and I am a resident of King County District 8 and the Finance Manager at the White Center Community Development Association (WCCDA). I am respectfully submitting this testimony in support for Proposed Ordinance No. 2023-0440 relating to the 2024 King County Comprehensive Plan update.

As a member of the 2024 Comprehensive Plan Update's Equity Workgroup, I spent extensive time with community members, County staff, and in community educating and advertising the updated plan and encouraging community input and participation. This document is the collaboration of countless hours labored by County staff, the input of residents in all corners of King County, and the invaluable insights and direction given by community members on the Equity Workgroup. Overall, this document highlights the tireless advocacy of community members to ensure that government works for the people.

Workgroup members were able to dive into housing policy as a priority area, and given the ability to comment on the equity analysis done by staff. It was clear that housing policy was a priority from all members of the Equity Workgroup and considerable time was spent on this topic. Priorities for the County to study mandatory Inclusionary Housing and/or Community Preference to help the need for affordable housing and ensuring displacement of cultural communities does not occur, and the study of feasibility to incentivize property managers/owners to rent to lower income families with an MFTE

style program are huge steps forward for unincorporated communities, and need to be supported by this Committee.

These additional areas touched upon by the Equity Workgroup and highlighted by the County's document are also crucial:

- Incorporate an anti-displacement framework into the 2024 Comprehensive Plan for all unincorporated areas to prevent and mitigate cultural loss and displacement;
- Protect existing cultural resources and BIPOC institutions and support community led efforts to develop and retain existing small businesses and resilient communities;
- Take intentional steps to repair harms to BIPOC households around racially exclusive and discriminatory land and property practices; and
- Advocate for more funding and/or revenue for affordable housing construction.

As the Finance Manager at WCCDA, I have the privilege to work with community members, leaders, and business owners in White Center. I cannot stress enough how important it will be to find a balance between the needs of preparing for the future and taking time to acknowledge the vibrancy already in place. The people who have established themselves and made unincorporated King County home and have established businesses and families are immigrant/refugees, second or third generation families, multifamily/caregiving households, displaced folks priced out from other cities, and amazing people who found opportunity and are flourishing. This vibrancy is thanks to the Black, Indigenous, Latino, Vietnamese, Khmer, Somali and others of African origin, and so many more who want to thrive in place.

I believe this draft of the 2024 Comprehensive Plan update will help lead us into the right direction, and provide support and invest in unincorporated King County for the future.

Please do not hesitate to contact me with any questions you may have. I am truly thankful for the opportunities that are made available for BIPOC communities through this work!

Thank you,

A handwritten signature in black ink, appearing to read 'Spencer Lau, Jr.', written in a cursive style.

Spencer Lau, Jr.

To: The King County Council

My name is Steven Lewis . I am a retired disabled veteran. A member of the NAACP. I recently worked on the King County Comprehensive Plan in 2023. I was proud to be a part of this work. The community involvement aspect was an enormous part of its success. Stressing the urgency of developers to adhere to low income housing. Low income housing in reference to the free and reduced lunch program should be the definition. This was one of the important matters presented to the Comp plan work group. Low income housing is one of many issues facing the community. Developers being held to this standard would make a major difference. I would hope that the council would consider to reestablish this work group moving forward for years to come.

Thank you.

Respectfully,
Steven Lewis

From: [Patricia Warren](#)
To: [Policy Staff, Council CompPlan](#)
Cc: [Perry, Sarah](#)
Subject: Snoqualmie Valley/NE King County Subarea Plan
Date: Tuesday, January 16, 2024 1:44:24 PM

Dear Council Members,

Please accept the following comments on the proposed Subarea Plan. My family has been a property owner in the Index Creek Road community for more than 80 years. Additionally, I have a specific background related to historic and cultural resources including an M.A. in Museum Studies, service as a board member and president of the Washington Museum Association, and service on the Landmarks Commission of Astoria, Oregon.

- One of the Guiding Principles of the Plan reads, "Preserve cultural and historic resources and landmarks." Sadly, I do not find this principle well represented in the Plan. At the very least, historic resources and landmarks, especially those with national significance, should be described and an appropriate level of care and conservation included. The County needs to invest in the preservation of these irreplaceable resources.
- Page 24: The information about the Baring area needs to include its timber and mining history and its nationally-recognized Baring Bridge.
- Page 50: The text indicates that the size, scale and aesthetic of existing development should be maintained. This idea should include the need to preserve and restore historic resources like the Baring Bridge.
- Page 77: This section is titled, "King County Plans and Programs Relevant to Parks, Open Space and Cultural Resources". The following text does not include any mention of historic preservation plans or policies. The treatment of cultural resources is missing with the exception of only a phrase on page 78, "... the preservation of historic landmarks is of interest..." This subject needs to be addressed further including the County's commitment to invest in these treasures.
- Page 79: Transportation activities should be consistent with the service level and protect rural character. The Baring Bridge, when kept in proper repair and with appropriate investment, is necessary to protect the rural character of the Index Creek Road community.
- Page 81: Certainly a conflict arises between blanket statements regarding the need for bridge replacement and the need to preserve historic resources like the Baring Bridge. The Council should address this conflict and give significant and overriding weight to the preservation of this resource of national significance.
- Page 84: Enhanced maintenance of the Baring Bridge will help preserve this unique resource and should be addressed.
- Page 185: The preservation of historic landmarks and cultural resources is excluded from this section as they are apparently covered by the more general Comprehensive Plan. This is likely true for many of the topics addressed in the Subarea Plan. Historic Resources and landmarks in the Subarea should be specifically addressed in the Subarea Plan to enhance their preservation.

Thank you for your attention to these comments.

Patricia Warren
1109 NE Maple Pl
Coupeville, WA 98239
360-682-5411

1/17/24 LSU

To: The King County Council

My name is Steven Lewis . I am a retired disabled veteran. A member of the NAACP. I recently worked on the King County Comprehensive Plan in 2023. I was proud to be a part of this work. The community involvement aspect was an enormous part of its success. Stressing the urgency of developers to adhere to low income housing. Low income housing in reference to the free and reduced lunch program should be the definition. This was one of the important matters presented to the Comp plan work group. Low income housing is one of many issues facing the community. Developers being held to this standard would make a major difference. I would hope that the council would consider to reestablish this work group moving forward for years to come.

Thank you.

Respectfully,
Steven Lewis

**KC Council 2024 KCCP Update
Local Services & Land-Use Committee Briefings
Joint Team Oral Testimonies**

January 17 — LSLU Committee – Briefing 1

Overview, Schedule, Process [Peter Rimbo—Joint Team Coordinator; GMVUAC]

Good morning. My name is Peter Rimbo. I am the Coordinator for a Joint Team of ten Rural Area organizations and three Rural Technical Consultants. We endeavor to review, consult, develop, and offer solutions on issues of interest to people who live in a wide expanse of King County's unincorporated Rural Area. Each of our organizations considers its work on the KCCP one of its most important duties and responsibilities. Indeed, our Joint Team has been through multiple successive Major Updates with some of our member organization's work on same going back nearly 20 years and others further back to the pre-Growth Management Act days, when there were no formal KCCPs.

For this Update we began engaging with KCCP Manager, Chris Jensen, in early 2022. We have reviewed materials and submitted detailed comments throughout the process. We have reviewed the Executive's December 7 "*Recommended Plan*" and have drafted a set of detailed comments—150 pp and counting, which should be ready to submit to you by February 7. We plan to fully participate in all of your Briefings.

Given the importance of this 10-year Update and the complexity of its many Chapters, Appendices, Reports, etc., we strongly urge the Committee to *re-consider* its schedule as follows:

(1) Meet every week. Do not combine several major topics into one meeting. For example:

(a) The February 7 meeting includes: *Chapter 1: Regional Planning; Chapter 2: Urban; and Growth Targets & UGA Appendix*. To give such important topics justice, two separate meetings are warranted.

(b) The April 3 meeting includes: *Chapter 7: Parks, Open Space, & Cultural Resources; Chapter 8: Transportation; Transportation Appendix; and TNR Appendix*. This is even tighter. In fact, the three Transportation topics *alone* warrant two separate meetings.

(2) Move up "*Development Regulations*" from its May 1 meeting to a much earlier meeting and devote the entire meeting to this topic. KC Code is simply too important to the entire process and all of us.

SVNE Subarea Plan [Mike Birdsall—Rural Technical Consultant]

My name is Mike Birdsall. I am a member of the Joint Rural Area Team of ten organizations, and I serve as its Transportation Technical Consultant. I have decades of experience helping cities and counties to prepare transportation plans under the Growth Management Act. I am here to discuss the SVNE Subarea Plan on behalf of the Joint Team.

Other Joint Team members participated with county staff in developing the land use and environmental portions of the Subarea Plan. Those elements are well done, due in part to extensive engagement of members of the Public. Findings of the Subarea Plan strongly support and echo Joint Team concerns for protection of the Rural Area, Agricultural lands, and Forest lands with a priority on sustaining a healthy rural ecosystem and lifestyle, and no increase in urban lands, or urban-serving businesses.

That said, we are disappointed in Chapter 8 (Transportation) for its lack of useful information. Although transportation conditions in the SVNE Subarea are going from bad to worse, the Public Review Draft released

**KC Council 2024 KCCP Update
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Joint Team Oral Testimonies

last June was just six pages of boilerplate with no substantive information. I objected to that last summer, but this current version remains unchanged. There is still no substantive identification of tangible transportation issues let alone discussion thereof. My comments submitted last summer gave extensive direction for the type of additional substantive information needed. I don't know why no changes were made to improve the current version. The current Vashon Subarea Plan has a much more detailed Transportation Chapter, while covering a smaller, less complex area. The comparison is striking.

My extensive comments last summer remain valid. They were submitted then as an independent observer, but the Joint Team is now in full agreement. Therefore, the Joint Team will be **re-submitting** those same comments in its detailed Written Comments. We hope to see substantial expansion of this chapter *before* it is adopted later this year.

Chapter 11: Subarea Planning [Karen Meador—GV/LHA]

My name is Karen Meador. I am a member of the Green Valley/Lake Holm Association, one of the many organizations that comprise the Joint Rural Area Team. We also are one of three organizations that fall under the Southeast King County Community Service Area (CSA). We are concerned that completion and approval of some of the CSA *Subarea Plans* are now pushed out as far as the middle of the next decade. A number of the Joint Team organizations serve under three CSAs—Bear Creek/Sammamish; Southeast King County; and Four Creeks/Tiger Mountain. Under the current schedule, they will not have their *Subarea Plans* approved until 2031, 2032, and 2036, respectively.

We respectfully recommend the DLS Permitting Division retain sufficient Planners to conduct subarea planning simultaneously for two CSAs, thus condensing the current schedule (we believe there only are two Planners and they may have other duties.) There are a number of cultural and heritage venues within each of the CSAs, as well as limited natural resource lands. The GV/LHA and Enumclaw Plateau Community Association, both within the SE King County CSA, are each home to a King County-designated Heritage Corridor, as well as a King County-designated Agricultural Production District. Such venues are found in a number of the King County CSA's. As a writer and historian, I have researched and written about a number of them, and believe condensing the Subarea Planning Schedule would assure many of us an opportunity to assist in preserving the rural character, heritage venues, scenic qualities, and other distinct features that make King County's CSAs unique legacies for future generations to appreciate and enjoy.

Map Amendments [Tim O'Brien—EPCA]

My name is Tim O'Brien. I am the Chair of the Enumclaw Plateau Community Association, one of the many organizations that comprise the Joint Rural Area Team. Personally, I have a background in heavy equipment and construction. We suggest adding the following **Map Amendment**: *[NOTE: HIGHLIGHTED ITEMS BELOW NEED NOT BE STATED IN ORAL TESTIMONY, ONLY IN OUR WRITTEN COMMENTS.]*

Map Amendment XX: Countywide – P-Suffix Zoning / Development Conditions

1. Remove P-Suffix zoning (EN-P01, FC-P02, SV-P37, SV-P037, SV-P11, SV-P12, SV-P13, SV-P15, SV-P17, SV-P18, SV-P19, SV-P20, SV-P21, SV-P25, SV-P26, SV-P28, TR-P09, TR-P21, TR-P22) for commercial, industrial or mining activities in the Rural Area of unincorporated King County, if the condition is not currently met and remains out of compliance for one year, then zoning reverts back to

**KC Council 2024 KCCP Update
Local Services & Land-Use Committee Briefings**

Joint Team Oral Testimonies

underlying/original (non-commercial) zoning. Further, if the ownership changes, the uses would revert to underlying zoning.

2. Repeal P-Suffix Development Conditions EN-P01, ES-P04, FC-P02, GR-P04, GR-P03, GR-P02, GR-P01, SV-P37, SV-P037, SV-P11, SV-P12, SV-P13, SV-P15, SV-P17, SV-P18, SV-P19, SV-P20, SV-P21, SV-P25, SV-P26, SV-P28, TR-P09, TR-P21, TR-P22 from Zoning Atlas.

Effect:

- ***Most of these P-Suffix development conditions are many years out of date and not transparent to the Public. This would allow parcels that do not meet the commercial development conditions to revert back to underlying zoning for more clarity and transparency in zoning, provide more land for additional housing units, reduce impact of and cost to regulate commercial business in the Rural Area and restore Rural Character and help improve tourism and more sustainable economic development in the Rural Area.***

1/17/24 LSWU

Statement to the King County Council Subcommittee on Local Services and Land Use- 1/17/2024

Tony To, member of the Comp Plan Update Equity Work Group

Chair Perry and Members of the Committee:

My name is Tony To and I am a happily and productively retired resident of District 2 in King County. Most of you know me from my working years as the Director of HomeSight, a regional non-profit developer and statewide mortgage lender serving first time homebuyers. I have also served on numerous policy and planning bodies in Seattle, King County, the State and nationally. Most relevantly, I served on the King County Regional Affordable Housing Task Force, the PSRC Economic Development District Board, Co-Chaired the Metro Equity Cabinet, and am finishing my participation in the King County Comp Plan Update Equity Work Group.

You will hear from some of us this morning and others are sending statements which are included in the staff briefing packet. The 15-member Equity Work Group started our work about a year ago. You have two documents that summarize our work with King County staff and leadership. The first is a two-pager titled "Compilation of the 2024 Comp Plan Equity Work Group Priorities". The second is a seven-pager "Compilation of Equity Work Group Comments on Housing Proposals". These comments were recorded during topical discussions throughout the past year of convenings. Please take time to review these documents as you begin your deliberations.

I am here to strongly support the draft Update and to acknowledge the leadership and support of the County Executive in his continuing effort

to incorporate race and social equity directly into the iterative work of this and hopefully future Comp Plan updates.

I've been around long enough to remember when the word "race" let alone the real impacts of racial and other forms of marginalization were entirely absent from Comp Plans. They still are, mostly. This draft represents a first in that regard. The terms "Minorities" and "low income" were relegated to the HUD mandated Consolidated Plans to preserve Federal fund allocations. My heart felt thanks in advance for adopting the use of the word race in conjunction with equity in the body of the draft document.

Here are six questions to ask as you and your staff begin the review process-

1. How can the Comp Plan be truly comprehensive by persistently integrating quality of living issues such as housing, transportation, economic opportunity, open space, public health and not treat each as a separate chapter and silo?
2. How can the proposed changes address and repair structural barriers to advance greater racial equity?
3. How can the proposed changes narrow or eliminate gaps and create new opportunities for those previously denied?
4. How can we increase density, introduce mixed zoning, and leverage the regional transit system while offering existing residents and businesses the opportunity to remain in place and share in the benefits of growth?
5. How can we ensure that future investments increase equitable opportunities rather than widen historic gaps and disparities between the advantaged and the marginalized?
6. How can we preserve and encourage time tested existing examples of success such as the thousands of naturally occurring

affordable housing complexes and successful local business districts?

Specific policies that the EWG want to emphasize are-

- expanding inclusionary housing.
- better integrating housing, transportation, and cultural preservation connected to economic development;
- using preference policies where the threats of displacement are the highest for both residents and local businesses.

The EWG is collectively encouraged and appreciative of the update process, especially the work of the staff and their tireless effort to listen and take our feedback and input to heart. We recommend that this process continues, is permanently resourced, and is elevated to be more of a co-design or co-creation process between community participants and KC staff.

Lastly, I want to make a point about the MFTE program from my observations as a member of the KC Board of Appeals and Equalization. The county currently does not have an MFTE program, but it should, as part of any inclusionary housing proposal for unincorporated areas. The MFTE program was authorized to be renewable by the State two years ago and as a result is very popular among for-profit developers. This is a good thing but as someone with a background in real estate finance and development, I suggest that each renewal cycle should require an increase in the proportion of affordable units. And if jurisdictionally possible, we should encourage or require the same in incorporated areas or cities that have MFTE programs. This is entirely feasible as investors who require higher initial returns exit and are cashed out over time. Large multifamily developments become more affordable over time as investors exit, loans are paid off or refinanced, and occupancy is stabilized. The MFTE program should account for and leverage this

market driven process. I encourage the policymakers to find ways to incentivize property owners who hold and maintain properties over time rather than build and flip. Currently long-time property owners who have almost all affordable units in older buildings pay full property taxes while new projects with 8%-20% affordable units pay zero taxes on the improvement portion of their assessments.

Thank you for inviting us to participate in the kickoff of the Comp Plan Update process. I hope future updates will be a co-creation process between the community and the county supported by permanently committed resources. Inclusive planning will build stronger communities and more cost-effective implementation.

**January 18, 6:30 PM, Council Chambers
LS&L-U Special Committee Meeting**

Public Hearing on Draft EIS [Peter]

My name is Peter Rimbos. I am the Coordinator for the Joint Team which consists of *Enumclaw Plateau Community Association, Friends of Sammamish Valley, Greater Maple Valley Unincorporated Area Council, Green River Coalition, Green Valley/Lake Holm Association, Hollywood Hill Association, Soos Creek Area Response, Upper Bear Creek Unincorporated Area Council, and Vashon-Maury Island Community Council*. We also have three Rural Technical Consultants: Ken Konigsmark—Growth Management Focal; Mike Birdsall—Transportation Focal; and Terry Lavender— Environment/Open Space Focal.

With respect to the *Draft EIS*, we support much of what is described in the **Extensive Change Alternative** considered, such as: *“Require cities to pay impact fees and implement traffic demand management strategies for large developments that impact unincorporated areas;”* however, we do have several concerns:

- (1) Greater land conversions in the Rural Area and Natural Resource Lands and urban development in the Rural Area.
- (2) *“... greater urban development within unincorporated rural areas. Tourism, resort, and economic development-oriented buildings ... allowed to a greater degree in the Rural Area, on Natural Resource Lands, and within agricultural zones...”*
- (3) *“Allow additional clearing of trees and vegetation in unincorporated King County, without a permit, for habitable structures and utilities.”*
- (4) *“Make substantive updates to the 4:1 program requirements, such as allowing for: a reduced open space ratio...noncontiguous open space...nonresidential projects...and projects not likely to be timely annexed.”*
- (5) *“Modify and expand the TDR program, such as ... allowing urban open spaces that were previously acquired using conservation futures tax funding ... to become TDR sending sites, removing specific goals for reduction of development potential outside the Urban Area, ... and allowing for payment into the TDR bank when TDRs are not available.”*
- (6) *“Make substantive updates to the existing land use designations and zoning classifications ... such as ... incentivizing agritourism....”*
- (7) *“Expand SEPA exemptions to the maximum allowed by WAC 197-11-800.”*
- (8) Several suggested *“land use designation and zoning classification changes.”*

Thank you.

1-18-2024

DEIS Comment Form



King County 2024 King County Comprehensive Plan Update

Name: MARK SWARTZ

Email: MARK@PARKSLEGACY.COM

Check to receive email updates on the 2024 Comprehensive Plan Update

Which best describes your interest in the 2024 King County Comprehensive Plan Update?

I live in King County

I work in King County

Professional interest

The Draft Environmental Impact Statement (EIS) describes reasonable alternatives for the 2024 Comprehensive Plan update; the potential significant adverse impacts on the natural and built environment; and mitigation measures that would avoid or minimize adverse impacts.

As part of the EIS process, the County is seeking comment on the Draft EIS. Comments could address whether the Draft EIS:

- is complete and accurate,
- provides enough information to analyze likely impacts,
- correctly characterizes the impacts, and
- whether the avoidance, minimization, and mitigation measures are appropriate.

Please share your feedback and comments on the Draft Environmental Impact Statement.

NOT IN FAVOR OF REVERSAL OF CURRENT
POLICY TO PROHIBIT MPR'S - PROPOSAL
329-A

DEIS Comment Period: Comments must be received no later than 11:59 PM on Wednesday, January 31, 2024. In addition to this form, comments can be made at the January 18th, 2024, public hearing or by email: CompPlan.SEPA@KingCounty.gov. All comment channels receive equal consideration.

From: [Camp, Cherie](#) on behalf of [Clerk, King County Council](#)
To: [Williams, Gabriela](#); [Legislative Staff, Council CompPlan](#)
Subject: FW: 2024 Comp Plan Update DEIS Comment, Request to Adopt MFTE in White Center
Date: Wednesday, January 31, 2024 9:23:02 AM
Attachments: [King County 2024 Comp Plan DEIS, MFTE in White Center.pdf](#)

From: Courtney Flora <cflora@mhseattle.com>
Sent: Tuesday, January 30, 2024 3:01 PM
To: Compplan <compplan@kingcounty.gov>; Miller, Ivan <Ivan.Miller@kingcounty.gov>; Smith, Lauren <Lauren.Smith@kingcounty.gov>
Cc: Clerk, King County Council <Clerk@kingcounty.gov>; Perry, Sarah <Sarah.Perry@kingcounty.gov>; Colin Cashel <ccashel@fivepointcm.com>; Vaughn Brock <vaughn@veritasfamilypartners.com>; Jessica Clawson <jessica@mhseattle.com>
Subject: 2024 Comp Plan Update DEIS Comment, Request to Adopt MFTE in White Center

Hello— Please see the attached comment letter on the draft EIS for the 2024 Comprehensive Plan Update.

On behalf of Five Point Capital Partners, developer of a new mixed-use housing project in White Center, we are requesting that the County study and implement the Multi Family Tax Exemption (MFTE) in the White Center neighborhood.

The state legislature expanded MFTE to include White Center in 2021, but the County has not acted to implement MFTE— despite the fact that it would incentivize investment necessary to combat the affordable housing crisis.

Thank you for your attention to this comment and please reach out with any questions.

Courtney Flora
Partner
McCULLOUGH HILL PLLC
701 Fifth Avenue, Suite 6600
Seattle, Washington 98104
Direct: 206-812-3376
Cell: 206-788-7729
cflora@mhseattle.com
www.mhseattle.com

NOTICE: This communication may contain privileged or confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.

From: [Peter Rimbos](#)
To: [Compplan Sepa](#)
Cc: [Policy Staff, Council CompPlan](#); [KCC - Legislative Clerks \(Email Group\)](#); [Miller, Ivan](#); [Jensen, Chris](#); [Taylor, John - Dir](#); [Greg Wingard](#); [O'Brien \(EPCA\) Tim](#); [Lavender](#); [Tanksley \(HHA\) Michael](#); [Stafford \(UBCUAC\) Nancy](#); [Konigsmark Ken](#); [Eberle \(FCUAC\) Peter](#); [Benedetti \(GV/LHA\) Andy](#); [Buchanan \(GMVUAC\) LarKen](#); [bencarr8](#); [Affolter \(V-MCC\) John](#); [Glover \(FoSV\) Serena](#); [Guddat \(SCAR\) Jeff](#); [Birdsall Mike](#)
Subject: 2024 KCCP Major Ten-Yr Upd--DEIS--Joint Team Public Comment
Date: Tuesday, January 30, 2024 11:20:30 AM
Attachments: [KC Exec"s Recom"d Plan--DEIS Comments--1-30-24.pdf](#)

Mr. Miller,

Please accept the attached Comments on the subject DEIS from the Joint Rural Area Team.

Peter Rimbos
Coordinator, Joint Rural Area Team--*KCCP*, *CPPs*, and *VISION 2050*
Greater Maple Valley Unincorporated Area Council (GMVUAC)
primbos@comcast.net

"To know and not to do is not to know."-- Chinese proverb

Please consider our shared environment before printing.

From: [Jerry Norman](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: Housing
Date: Wednesday, January 31, 2024 6:49:59 PM

you as a Council have no understanding as to the cost of housing. Subsidizing housing does not lower the cost of housing. The extensive regulations permits inspections and government overreach have caused the cost of housing to be unacceptable. You need to look in a mirror and have an honest appraisal of what your actions actually do. In general they increase the cost of housing. Taking money away from taxpayers to pay other peoples housing cost does not reduce the cost of housing. It never will. Need to reverse some of your mandatory guidance to cities. And listen to real people that understand economics.

Jerry Norman

4258292304

From: [Washington Sensible Shorelines Association](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Cc: [Jamie Brakken](#); [Scott Sheffield](#); [Peter Lamanna](#)
Subject: 2024 Comprehensive Plan
Date: Wednesday, January 31, 2024 6:24:55 PM
Attachments: [Stormwater Concurrency in the KC 2024 Comprehensive Plan.pdf](#)

Washington Sensible Shorelines Association is submitting information on the need for stormwater concurrency, for inclusion in the King County 2024 Comprehensive Plan.

Thank you,

Laurie Lyford

Sent from [Mail](#) for Windows

From: [Karen](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: 2024 King County Comprehensive Plan
Date: Thursday, February 1, 2024 10:10:58 AM

Questions from Karen Campion, a longtime resident in South King County:

How can you allow Industrial Businesses to use the same RESIDENTIAL dirt road (now with permanent gigantic potholes) where my RESIDENTIAL house is located?

Do you know how difficult it is for me to fill in the permanent gigantic potholes? What about using pulled weeds as filler for the permanent gigantic potholes?

Do you realize how difficult it is to drive a car over the ditch that is forming between Military Road (not Street) and 35th Avenue South (south of 374th Street)?

How are you going to address cars turning left and right into yard fences?

How can you address the increase of car traffic on (non-stop) Military Road?

From: [Cliff Hanks](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: King County Comprehensive Plan Comments for NE King County
Date: Thursday, February 1, 2024 9:39:44 AM

To Whom it May Concern:

I encourage funding and developing a delivery date for two items already in the budget:

Budget ID: SNVC.016 - Raise 124th and flood resiliency

Budget ID: SNVC.028 - Public Transit Connecting Carnation to Redmond Park and Ride

In addition, I would like to see the following three items added to the Comprehensive Plan as a high priority:

1. Raise Tolt Hill Road similar to 124 to improve flood resiliency. There have been a couple of times when Carnation was completely cut off from surrounding communities. Raising the road means it can stay open during flooding, which improves mobility and public safety so that police, fire, and medical emergency personnel can access Carnation.
2. Add a roundabout to Highway 203 and Tolt Hill Road. Remlinger Farms has held some major events that cause heavy traffic, making it difficult to turn left from Tolt Hill Road into Carnation. There is also a new housing development being built near this intersection that will also increase traffic.
3. Widen 202 from Fall City to Sahalee Way to four lanes. As more housing developments are added to the rural areas to support the Growth Management Act, we need improvements to the road infrastructure to support the increase in population.

Thank you.

Cliff Hanks

From: [Nelson, Maxwell](#)
To: [Legislative Staff, Council CompPlan](#)
Cc: [Mayhew, Robin](#); [Leth, Mark](#); [Phelps, Travis](#); [Mike Swires](#); [Kenna, Matthew](#); [Storror, Jeff](#); [Smith, Lauren](#); [Miller, Ivan](#)
Subject: WSDOT Comments on King County Comprehensive Plan and EIS
Date: Thursday, February 1, 2024 8:42:38 AM
Attachments: [WSDOT comments on King County comp plan and EIS.pdf](#)

To the King County Comprehensive Plan Update Team,

Please find attached: WSDOT's comments on the King County Comprehensive Plan and associated EIS

(I tried to send this by COB yesterday, according to Outlook it was "outboxed" rather than transmitted)

Thank you,

-Max

From: [Alison Jeske](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: Input re: residential housing
Date: Tuesday, February 6, 2024 4:02:58 PM

Hello-

As we know, there is a shortage of affordable housing in our region. There needs to be a multi-prong approach to tackle this issue. I'd like the Council to consider two topics to help provide some (albeit small) relief.

1) Subdivision rules - I live on a 1.75 acre parcel and would like to consider subdividing into smaller parcels for homes. In our area the lots are 5 acres (though ours was grandfathered in some decades ago). While I know there will be a need for environmental studies and neighborhood input, I'd like to at least see a simple process in place to submit a request. Perhaps this could be incorporated into the ADU policies.

2) We built a detached garage some time ago and planned for an apartment to be built on the top floor (we live close to Issaquah schools and hope this would provide access to a teacher). The permitting process is confusing, rigid and expensive. If we can streamline the process for permitting and construction of these add-ons, this could allow more homeowners to participate. As it is, many neighbors have just given up. I'm sure the current permitting processes are labor heavy, so providing some improved processes/automation would certainly help with that.

I am just starting to review the comprehensive plan, so these topics may be covered. I am unable to attend the meeting in my local area, so wanted to provide my input.

Thank you,
Alison Jeske

P.S. Huge kudos to the team assembling that plan! Having worked on documents like that in a past life (but smaller scale), I fully appreciate the effort and attention to detail.

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

February 6, 2024

To: **King County Council Local Services & Land-Use Committee:**
CouncilCompPlan@kingcounty.gov

Re: **Public Comment— 2024 KCCP Major Update—Executive's Recommended Plan**

Please accept *Comments* herein on the subject **2024 King County Comprehensive Plan (KCCP) Major Update (Update)—Executive's Recommended Plan (ERP)** from the Joint Team of King County Unincorporated Rural Area organizations (*).

We have participated in the **Update** since the beginning of 2022 working with KCCP Manager, Chris Jensen. We provided detailed *Comments* on *Scoping, Conceptual Proposals, Environmental Impact Statement (EIS) Scoping*, and the *Public Review Draft*. We have now conducted an in-depth review of the ERP—all Chapters, Appendices, and Supporting Documents. Our *Comments* encompass KCCP Text, KCCP Policy changes, and changes to King County Code. We found that the Executive's Office used many of our comments to improve the **Update**—we thank them. However, we still find several areas where changes should be considered to minimize unintended negative consequences to the Rural Area. We encourage you to please consider our *Comments* herein as the you proceed in your review and approval process of the **Update**.

For some Chapters, Appendices, and Supporting Documents we have included *Overall Comments* to provide a broad perspective on the subject matter, followed by our *Specific Comments* on Text, Policies, Code, Maps, etc. Our *Comments* primarily deal with items where we offer recommended changes and provide supporting rationale. In general, we have not provided comments on those items we consider good and, thus, approve.

In general, what we see in the ERP is very good, but we do have issues in several areas which we document herein. The County has many very good Policies—although there still remain too many “*shoulds*,” which we would like to see changed to “*shalls*”—and strong Code language. However, all too often, either through poor interpretation, spotty followthrough, poorly funded and not-prioritized enforcement, and myriad exceptions / special considerations, the County does not give justice to or uphold those Policies and Code in practice on the ground to serve its residents.

Unfortunately, the County often violates its own codes and policies, forcing rural residents to have to fight their own government in efforts to protect their neighborhoods and property rights. (e.g., Wineries, Breweries, and Distilleries; Mining and extended reclamation; Pacific Raceways continual expansion; Cedar Hills Regional Landfill continual expansion (outward and upward); Asphalt Facility along the Cedar River (*without* an EIS); Keesling property development; etc.). Consequently, the County's failure to uphold and enforce its own Policies and Code has cost Rural Area residents hundreds of thousands of dollars in legal costs, untold hours of effort, and immense frustration in

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

having to fight these battles. Our message is simple: If the County truly supports the Policies and Code in the KCCP, then it must uphold and enforce them!

There are several major *Themes* we developed as we conducted our review:

- The County's *Guiding Principles* are well developed, but some are poorly followed.
- There are good Policies defining "*Rural Character*," but the County's followthrough is wanting.
- The County has excellent Policies to protect and enhance the environment.
- The County has excellent Policies to protect and enhance parks and open space.
- The financial system for County roads is broken, needs of unincorporated areas are neglected, and city-to-city traffic uses Rural Area roads excessively.
- Urban or urban-serving facilities should not be sited in the Rural Area.
- The rural economy is endangered by allowing urban-serving businesses in the Rural Area.
- Mining sites, upon resource exhaustion, must revert back to the rural forest resource land base, as intended by County Code and KCCP Policies, not to *non-resource* uses.
- The County's permitting and code enforcement function is broken and fails to perform its essential duties to uphold County policies, codes, and laws; consequently, implementation of many great policies and codes is inadequate regarding permitting, land use, code enforcement, and other issues impacting development and uses on Rural Area parcels.
- The current Growth Target and Allocation system is badly flawed and, by ignoring those flaws, we perpetuate them *ad infinitum*. Unfortunately, Growth Targets cannot be enforced to keep *irresponsible* cities, such as Black Diamond, from grossly overgrowing and directly impacting County roads and burdening rural residents, while not paying for mitigation.
- Changes to Code are needed, e.g., Special-Use Permits (SUPs), Temporary-Use Permits (TUPs), Conditional-Use Permits (CUPs), etc., must be focussed and limited.
- Permit exceptions should be just that—exceptions for a very specific purpose meeting very specific, temporary, and non-recurring situations or conditions, not the rule.
- Multi-family housing should not be allowed outright in Rural Towns.
- The "*fee in lieu*" concept encourages market rate housing *without* equivalent creation of affordable housing.

Our Joint Team endeavors to review, consult, develop, and offer solutions on issues of interest to people who live in a wide expanse of King County's unincorporated Rural Area. Each of our organizations considers its work on the KCCP one of its most important duties and responsibilities. Indeed, our Joint Team has been through multiple successive KCCP Major Updates (including the *2020 KCCP Mid-Point Update*) with some of our member organization's work on same going back nearly 20 years to the *2004 KCCP Major Update* and others further back to the pre-Growth Management Act (GMA) days, when there were no formal KCCPs.

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

Please note that one of our Joint Team organizations, the *Vashon-Maury Island Community Council (V-MCC)*, due to limitations in its By-Laws, is unable to complete its review of the ERP at this early stage and, hence, is *not* included in the approval “*signatures*” below. We have encouraged the V-MCC to submit its comments separately when ready and fully approved and request the County Council strongly consider them. Consequently, we have *not* included comments herein on the following sections/subsections of the ERP that warrant *specific V-MCC* comment:

Chapters:

- 2—URBAN COMMUNITIES
- 4—HOUSING AND HUMAN SERVICES

Appendices

- B - Housing Needs Assessment (Attachment C)
- [Part of] Land Use and Zoning Map Amendments (Attachment I)—[NOTE: We do include Comments from the rest of the Joint Team]

CSA Subarea Plans

- Vashon-Maury Island CSA Subarea Plan Amendments (Attachment H)

Reports

- Vashon-Maury Island P-Suffix Conditions Report
- Vashon Rural Town Affordable Housing Special District Overlay Final Evaluation

The V-MCC intends to fully participate at the King County Council Local Services and Land-Use Committee's *Special Meeting* to be held at the Vashon Center for the Arts on April 4 at 5:30 PM.

We intend to continue an open dialogue with the Council and engage with its staff as the **Update** proceeds through various sets of Public Comment opportunities including Public Briefings / Hearings at which we will offer multiple Oral Testimonies up to final approval in December of this year.

Please contact us should any questions arise during the review of our Comments herein. Thank you.

(*) *Joint Team: Enumclaw Plateau Community Association (EPCA), Friends of Sammamish Valley (FoSV), Greater Maple Valley Unincorporated Area Council (GMVUAC), Green River Coalition (GRC), Green Valley/Lake Holm Association (GV/LHA), Hollywood Hill Association (HHA), Soos Creek Area Response (SCAR), Upper Bear Creek Unincorporated Area Council (UBCUAC), and Vashon-Maury Island Community Council (V-MCC).*

Coordinated by:

Peter Rimbo

primbos@comcast.net

Regional Coordinator, KCCP Updates, KC CPPs, & PSRC's VISION 2050; GMVUAC
Coordinator, Joint Team Rural Area Team

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

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2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

**2024 King County Comprehensive Plan
Major Ten-Year Update**

Executive's Recommended Plan

***Joint Rural Area Team
Public Comment***

Submitted February 6, 2024

2024 KCCP Major Update Executive’s Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

Table of Contents

<u>Section</u>	<u>Page</u>
Chapters	8
1 - REGIONAL GROWTH MANAGEMENT PLANNING	9
2 - URBAN COMMUNITIES	13
3 - RURAL AREAS AND NATURAL RESOURCE LANDS	14
4 - HOUSING AND HUMAN SERVICES	32
5 - ENVIRONMENT	33
6 - SHORELINES	37
7 - PARKS, OPEN SPACE, & CULTURAL RESOURCES	38
8 - TRANSPORTATION	41
9 - SERVICES, FACILITIES, AND UTILITIES	60
10 - ECONOMIC DEVELOPMENT	64
11 - COMMUNITY SERVICE AREA SUBAREA PLANNING	68
12 - IMPLEMENTATION, AMENDMENTS, & EVALUATION	69
Appendices	73
A - Capital Facilities and Utilities (Attachment B)	74
B - Housing Needs Assessment (Attachment C)	75
C - Transportation (Attachment D)	76
C1 - Transportation Needs Report (Attachment E)	93
C2 - Regional Trail Needs Report	102
D1 - Growth Targets & the Urban Growth Area (Attachment G)	103
Land Use and Zoning Map Amendments (Attachment I)	105
King County Code Amendments	107
Summary of Proposed Ordinance (King County Code amendments)	108
Area Zoning and Land Use Studies	130
Black Diamond Fire Station	131
Carnation Urban Growth Area Exchange	132
Kent Pet Cemetery	133
Maple Valley Industrial	134
Snoqualmie Interchange Area Zoning and Land Use Study	135
Sustainable Communities & Housing Projects Demonstration Project	138
CSA Subarea Plans	139
Vashon-Maury Island CSA Subarea Plan Amendments (Attachment H)	140
Snoqualmie Valley/NE King County CSA Subarea Plan	141
Reports	144
Middle Housing Code Study	145
Vashon-Maury Island P-Suffix Conditions Report	148

2024 KCCP Major Update Executive’s Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

Update on Best Available Science & Critical Areas Ordinance Review149
Vashon Rural Town Affordable Housing Special District Overlay Final Evaluation150

Other Documents **151**

Supplemental Changes to the 2024 KCCP (A-23)152

Draft EIS **153**

Draft EIS154

Glossary **159**

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

Chapters

[KCCP](#)

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

1 - REGIONAL GROWTH MANAGEMENT PLANNING

Theme

- Although the County's *Guiding Principles* are well developed, we see several issues in which they are poorly followed.

Specific Comments

((H-)) King County Planning Framework

((A-)) Public Participation in Planning

pp. 1-5 and 1-6:

((R-102)) RP-103a King County ((will)) shall continue to support the diversity and richness of its rural communities and their distinct character by working with its rural constituencies through its Community Service Areas program to sustain and enhance the rural character of Rural Area and Natural Resource Lands.

This new policy is meant to replace policy **R-102** removed from **Chapter 3 - RURAL AREAS AND NATURAL RESOURCE LANDS**, which it does. We agree with it; however, there was introductory text *also* removed from Chapter 3, but *not* replaced in any fashion:

~~"In order to implement its goals, objectives, and strategies for broader public engagement, King County has created several Community Service Areas that encompass all of unincorporated King County, including areas without representation by any Unincorporated Area Council. The Community Service Areas provide a conduit for greater participation by all residents in unincorporated King County and increase opportunities for residents to inform county decisions relating to programs and capital projects within each Community Service Area."~~

We find this also was *not* included in **Chapter 11 - COMMUNITY SERVICE AREA SUBAREA PLANNING**, especially any discussion of the Unincorporated Area Councils. We recommend it be added back in, either here in Chapter 1, possibly under **((B-)) Multicounty Planning** policy **RP-104:**

RP-104 King County's planning ((should)) shall include multicounty, countywide, and subarea levels of planning. Working with planning partners, such as residents, **unincorporated Area Councils/Associations**, special purpose districts ((and)), cities, and Indian tribes ((as planning partners)), the ((c))County shall strive to balance the differing needs identified across or within plans at these geographic levels.

JOINT RURAL AREA TEAM COMMENTS

~~(G.)~~ Countywide Planning

p. 1-7:

RP-106 ***Except for Four-to-One proposals, King County shall not amend the Urban Growth Area prior to the Growth Management Planning Council taking action on the proposed amendment to the Urban Growth Area.***

We don't know why this has not been caught over the years, but this seems to *imply* that Four-to-One proposals are *exempt* from GMPC actions. The wording should be changed for better clarification.

~~(D. Sub-Regional)~~ Subregional Planning and Partnerships

p. 1-8:

RP-109a ***Upon notification from a city that abuts the Rural Area or Natural Resource lands regarding proposed large, mixed-use developments, King County shall coordinate **with** the city to ensure that the development review process mitigates impacts on the surrounding Rural Area and Natural Resource Lands.***

This new addition is a good first start, as it tries to “reverse-mirror” Countywide Planning Policy **DP-11**, but the County has “coordinated” with such cities and, in the case of Black Diamond, testified (both orally and in writing) during its 2010/2011 Master-Planned Development (MPD) Hearings—all to no avail, as we bore witness, all KC concerns, specifically traffic impacts on KC roads, were completely ignored. Until such cities are *required* (probably through State action through clear interpretation of or strengthening the *Growth Management Act*) to provide mitigation of their direct impacts to KC roads, such “coordination” will continue to be fruitless. Also, please note the word “with” needs to be added to policy **RP-109a**.

~~(F.)~~ Subarea Planning

p. 1-10:

RP-115 . . .
I. Identification of locations and conditions for special overlay districts.

We disagree with Council Committee Policy Staff's comments that “*P-suffix conditions and demonstration project areas could be added.*” The County's poor history with both—that can best be labeled “*loopholes*”—should give the Council pause.

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

~~((I. Managing Performance))~~

pp. 1-14 thru 1-15:

We see that this entire section has been removed along with its two policies. We understand it was deemed “*duplicative of (policy) I-301.*” We provided extensive comments on King County’s *Performance Measures* in our [PRD Comments](#) where we discussed the most recent (March 2022) [Comprehensive Plan Performance Measures Report](#), which looked at many good *Performance Measures*. We provided specific concerns with the following *Performance Measures*:

5: Peak hour travel is not degrading faster than growth: *Change in corridor peak hour travel times on major routes, compared to population and job change*

12: Non single occupant vehicle modes are increasing and per capita vehicle miles traveled (VMT) is decreasing: *Change in percentage of residents using alternatives to the single occupant vehicle, and per capita VMT*

13. Farms and forest lands are protected: *Change in total acreage of Agricultural Production District and Forest Production District, including acreage permanently privately protected or in public ownership*

Further, the *Performance Status* discussed in the March 2022 report did not appear to address departmental performance or any changes contemplated to improve such performance when or where necessary.

~~J. King County Strategic Plan~~

pp. 1-15 thru 1-16:

We suppose the *King County Strategic Plan* has been replaced by several individual subject-related Strategic Plans ([Equity and Social Justice Strategic Plan](#), [Strategic Climate Action Plan](#), [Clean Water Healthy Habitat Strategic Plan](#), [Strategic Information Technology Plan](#), [Strategic Plan for Public Transportation](#), and [Strategic Plan for Road Services](#)) and that is why this section has been removed?

~~((III.)) King County Guiding Principles~~

Guiding Principles

pp. 1-19 thru 1-25:

JOINT RURAL AREA TEAM COMMENTS

We fully support all *six* Guiding Principles. However, we too often see the County making decisions directly affecting the Rural Area that seem to circumvent the following *three* of those principles:

**Preserving and Maintaining Open Space and Natural Resource Lands
Directing Development Toward Existing Communities
Achieving Environmental Sustainability**

Examples of such decisions (or non-decisions)—listed alphabetically—include, but are not limited to:

- Cedar River Asphalt Facility (Determination of Non-Significance; *no* Environmental Impact Statement [EIS])
- Cedar Hills Regional Landfill (piecemeal footprint and height expansion)
- Code Enforcement (poor to none; violators routinely win and citizens who seek to uphold County codes and policies are forced to spend enormous sums trying to protect their own property, the rural area, and the environment, often AGAINST King County!)
- Illegal Clearcutting
- Illegal Event Centers allowed to continue
- Illegal “*Recycling*” Centers that violate multiple codes
- Pacific Raceways (piecemeal expansion without conduct of an EIS)
- Permits routinely granted for development that violates zoning laws and the principles underlying them
- Wineries / Breweries / Distilleries; Tasting Rooms (allowed to continue in the RA)

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

2 - URBAN COMMUNITIES

Please note that one of our Joint Team organizations, the *Vashon-Maury Island Community Council (V-MCC)*, due to limitations in its By-Laws, is unable to complete its review of the ERP at this early stage. We have encouraged the *V-MCC* to submit its comments separately when ready and fully approved and request the County Council strongly consider them. Consequently, we have *not* included any comments here on this part of the ERP that warrant specific *V-MCC* comment.

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

3 - RURAL AREAS AND NATURAL RESOURCE LANDS

Theme

- Although there are excellent Policies defining “*Rural Character*,” the County’s decision-making followthrough is wanting including its continuing breakdown in code enforcement.

Overall Comments

Establish a Rural Area Advisory Commission/Committee

Like the *Rural Forest Commission* and the *Agricultural Commission* described in section **VI. Natural Resource Lands starting** on p. 3-42, the County should consider establishing a *Rural Area Advisory Commission/Committee* comprised of rural residents from across the County, so that any proposals, policy changes, or code updates that affect the Rural Area may first be discussed with members and feedback provided to County staff, Council, and the Executive, as necessary. Our ten Rural Area Organizations and multiple Rural Technical Consultants would offer very qualified and experienced people to serve on such a *Rural Area Advisory Commission/Committee*.

Establish a Rural Landowner Incentive Program

There are *Forestry* and *Agricultural Incentive Programs* as described in Policies **R-206** and **R-209**, respectively, and Policy **R-609**. We seek a **new** Policy for a *Rural Landowner Incentive Program*, such as:

R-xxx *King County shall expand and improve existing programs and explore new programs to incentivize rural landowners to enhance their land by creating new or expanded forestlands, farmlands, or other uses that can benefit climate change goals, the environment, and wildlife.*

With such a program Rural Area landowners would be eligible to obtain property tax breaks for enhancing their land which do not fall under the *Current Use Taxation* program.

Specific Comments

p. 3-4:

~~((The purpose of the zoning and land use designations in the Rural Area is to provide services and limited goods that satisfy rural residents' and local businesses' daily needs))~~

JOINT RURAL AREA TEAM COMMENTS

We are glad to see this has been removed, as Rural Area residents do nearly all their shopping, etc. to meet their needs, in urban cities, possibly, some Rural Towns, and, to a far lesser extent, in Neighborhood Business Districts. However, we are unsure if it was removed for those reasons???

I. Rural Area and Natural Resource Lands

pp. 3-5 thru 3-6:

~~((A-))~~ Rural ~~((Legacy))~~ History and Communities

R-101 King County ~~((will))~~ shall continue to preserve and sustain its rural ~~((legacy))~~ history, character, and communities through programs and partnerships that support, preserve, and sustain its historic, cultural, ecological, agricultural, forestry, and mining heritage through collaboration with Indian tribes, local and regional preservation and heritage programs, community groups, rural residents and business owners including forest and farm owners, ~~((rural communities, towns, and c))~~ Cities in the Rural Area, and other interested ~~((stakeholders))~~ parties.

While we applaud the enhancements made in this policy, especially the change to “*shall*,” we wonder if the “*Cities in the Rural Area*” change will necessitate King County to “*collaborate with*” the City of Black Diamond, a “*City in the Rural Area*,” that is on its way to quintupling in population. This will result in peak-hour congestion (more likely, gridlock) on every King County road in and out of the city and no obligation whatsoever to mitigate that congestion or fund improvements on those roads.

pp. 3-6 thru 3-7:

~~((B-))~~ Rural Character

We support the description of “*rural character*” in this subsection and throughout the ERP. However, we have found throughout the decades that the County does not value this definition, nor follow its own Policies to protect and preserve “*rural character*” as well as it could and should. For a recent example, there is nothing in the entire problem surrounding the County Council’s Adult Beverage Ordinance (ABO) (i.e., Wineries, Breweries, and Distilleries—WBDs) that honors “*rural character*,” nor “*agricultural preservation.*”

~~H-))~~ Rural Area Designation

~~((B-))~~ Forestry and Agriculture in the Rural ~~((King County))~~ Area Geography

p. 3-10:

JOINT RURAL AREA TEAM COMMENTS

R-205 *Uses related to and appropriate for the Rural Area include those relating to agriculture, forestry, mineral extraction, and fisheries, such as the raising of livestock, growing of crops, creating value-added products, and sale of agricultural products; small-scale cottage industries; and recreational and small-scale tourism uses that rely on a rural location.*

This policy clearly states: "Uses related to and appropriate for the Rural Area include those relating to agriculture, forestry, mineral extraction, and fisheries, such as the raising of livestock, growing of crops, creating value-added products, and sale of agricultural products; small-scale cottage industries; and recreational and small-scale tourism uses that rely on a rural location." However, there are cases where the County doesn't abide by this. Again, as but one example, the ABO's WBD's do not meet any of these criteria unless one wants claim they "create value-added products" or provide the "sale of agricultural products." Which they don't. While we strongly support such Policies as **R-205**, the County all too often fails to follow them. Also, the phrase "cottage industries" is obsolete. The relevant phrase "**home occupations and industries**" should be used instead.

((III.)) Rural Densities and Development

((A.)) Rural Growth Forecast

pp. 3-17 thru 3-18:

We fully support the Policy **R-301** below, but cannot emphasize enough that one of the most important tools King County has at its disposal is adequate enforcement of its Policies and Codes, which it simply does not do.

- R-301:** **King County shall use all appropriate tools at its disposal to limit growth in the Rural Area and Natural Resource Lands, such as land use designations, development regulations, level of service standards and incentives, to:**
- a. Retain ((A)) a low growth rate ((is desirable for the Rural Area, including Rural Towns and Rural Neighborhood Commercial Centers, to));**
 - b. ((e)) Comply with the State Growth Management Act((;));**
 - c. ((continue preventing)) Prevent sprawl, the conversion of rural land, and the overburdening of rural services((;));**
 - d. ((r)) Reduce the need for capital expenditures for rural roads((;));**
 - e. ((m)) Maintain rural character((;));**
 - f. ((p)) Protect the environment, and**
 - g. ((r)) Reduce ((transportation-related)) greenhouse gas emissions. ((All possible tools may be used to limit growth in the Rural Area. Appropriate tools include land use designations, development regulations, level of service standards and incentives.**

JOINT RURAL AREA TEAM COMMENTS

B.)) Residential Densities

pp. 3-20 thru 3-31:

We have concerns with the Policy **R-309** and call for the following **addition**:

R-309 The RA-2.5 zone has generally been applied to Rural Areas with an existing pattern of lots below five acres in size that were created prior to the adoption of the 1994 Comprehensive Plan. These smaller lots may still be developed individually or combined, **provided they satisfy the minimum lot dimensions provided in King County Code, or combined to satisfy those requirements, and provided** that applicable standards for sewage disposal, environmental protection, water supply, roads, and rural fire protection can be met. A subdivision at a density of one home per 2.5 acres shall only be permitted through the Transfer of Development Rights from property in the designated Rural Forest Focus Areas. The site receiving the density must be approved as a Transfer of Development Rights receiving site in accordance with the King County Code. Properties on Vashon-Maury Island shall not be eligible as receiving sites.

The above addition would preclude further problems that currently exist with interpretation of “*these smaller lots.*”

((G-)) Transfer of Development Rights Program

p. 3-24:

We proposed adding to the following policy:

R-316 ~~g. Lands ((identified as important according to the Washington State Department of Ecology's Watershed Characterization analyses))~~ **in the RA zone with conservation values related to farming, forestry, carbon sequestration, environmental protection, or open space; or**

pp. 3-25 thru 3-26:

Policy **R-319** on TDRs has had significant changes made, many with which we agree. However, the following has been removed:

~~**Transferrable Development Rights may be used on receiving sites...**~~

JOINT RURAL AREA TEAM COMMENTS

~~d. Rural Areas zoned RA-2.5, unless they are on Vashon-Maury Island, may receive transfers of development rights, but only from the Rural Forest Focus Areas.~~

and essentially replaced with the following (on p. 3-26):

King County should prioritize Transferable Development Rights uses for residential density in urban areas. King County may also allow Transferrable Development Rights:

a. In limited instances for development in the Rural Area, except for Vashon-Maury Island; and ...

While this fails to define “*limited instances*,” the “Rationale for the proposed change” does describe this: “*Intent is ... (2) to acknowledge the limited rural use of Transfer of Development Rights (currently for concurrency and proposed for duplexes in a Rural Town), ...*” We understand there are only one and maybe two “*limited instances*” and they should be stated, but not simply in the unbinding Rationale, as this leaves the impression this is open and more limited instances could be added at any time. We prefer Policy language that more accurately states the intention and is specific and truly limiting. Since, from a legal standpoint, all that matters is what is contained in the Policy, *not* the supporting rationale, we call for the following changes:

R-319 King County should prioritize Transferable Development Rights uses for residential density in urban areas. King County may also allow Transferrable Development Rights:

- a. In limited instances for development in the Rural Area, such as increasing the size of an ADU in the RA-5 zone or to allow duplexes in the Rural town of Snoqualmie Pass, except for Vashon-Maury Island; and ...**
- b. To provide incentives to developers for uses other than additional residential density.**

D-)) Nonresidential Uses

p. 3-28:

While we agree with the spirit of Policy **R-324** below, we have big concerns with subparagraph **e.** and *what criteria* are used to determine whether “*recreational or tourism opportunities*” are “*compatible with the surrounding Rural Area.*” Such criteria need to be laid out either in Policy or Code along with details on who it is that determines if any activity or proposal is compatible. The Rural Area is *not* intended to be a playground for urban residents, it is in fact the “*rural residential area.*” There already are several examples (Wineries, Breweries, and Distilleries; Event Centers; etc.) that cater to urban residents, while creating severe problems related to noise, illegal/dangerous parking, congested roads, and nuisance impacts to neighbors. These facilities and venues already violate county codes,

JOINT RURAL AREA TEAM COMMENTS

yet are allowed to continue operations. The county needs to crack down on violators and should *not* be encouraging any more of these or similar activities.

- R-324** ***Nonresidential uses in the Rural Area shall be limited to those that:***
- a. Provide convenient local products and services for nearby residents;***
 - b. Require location in a Rural Area;***
 - c. Support natural resource-based industries;***
 - d. Provide adaptive reuse of significant historic resources; or***
 - e. Provide recreational ((and)) or tourism opportunities that are compatible with the surrounding Rural Area.***

Because non-residential uses in the Rural Area can and do have disproportionately large impacts on rural character, County road use, and safety, we propose the following **addition** to Policy **R-324a**:

- R-324a** ***((These)) Nonresidential uses in the Rural Area shall be sited, sized and landscaped to complement rural character as defined in policy R-101 and R-201, prevent impacts to the environment, limit burden and maintain safety on rural roads, and function with rural services, including on-site wastewater disposal.***

We propose the following **addition** to Policy **R-325**:

- R-325** ***Golf facilities shall be permitted as a conditional use in the RA-2.5 and RA-5 zones and when located outside of Rural Forest Focus Areas, Regionally Significant Resource Areas and Locally Significant Resource Areas((, as a conditional use, in the RA-2.5 and RA-5 zones)). King County will seek willing sellers to buy out Golf facilities already located in Rural Forest Focus and Regionally and Locally Significant Resource Areas with appropriate and available funds to convert into farmland, salmon habitat, new river channels, or other environmental improvements compatible with their location and resource potential.***

p. 3-30:

We propose the following **changes** to Policy **R-328**:

- R-328** ***Large airports, as well as, sSmall airfields beyond those already established in the Rural Area shall should not be permitted, due to their large and/or cumulative impacts on air traffic and nearby uses.***

p. 3-32:

JOINT RURAL AREA TEAM COMMENTS

We call for using the word “*shall*” in Policy R-336b:

R-336b ~~((Adoption of such codes may result in an increased use of r))~~ **Renewable energy technologies ~~((that))~~ may be sited in the Rural Areas and Natural Resource Lands, as appropriate. Development standards ~~((will seek to))~~ **should shall** ensure that the siting, scale, and design of these facilities respect and support rural character.**

p. 3-32:

((IV.)) Rural Public Facilities and Services

The ERP shows the opening paragraph of this section to be completely removed—most likely due to duplication found in paragraph 2 (the new paragraph 1). However, the removal of the phrase: “*provide guidance for siting those facilities that require Rural Area location*” with no suitable replacement, eliminates the concept that only those facilities that *require* a Rural Area location can be so located.

p. 3-33:

We proposed the following **changes** for policies **R-401** thru **R-403**. We believe the KCCP should reflect the very *real* concern we enunciated immediately above regarding the opening paragraph on p. 3-32.

R-401 **King County shall work with cities and other agencies providing services to the Rural Area and Natural Resource Lands to adopt standards for facilities and services in the Rural Area and Natural Resource Lands that:**

...
d. ~~((d))~~ Do not **require an urban level of infrastructure or encourage urban development.**

R-402 **Public spending priorities for facilities and services within the Rural Area and Natural Resource Lands should be as follows:**

- a. First, to maintain existing facilities and services that protect public health and safety;**
- b. Second, to upgrade facilities and services when needed to correct ~~((level of service))~~ **level-of-service** deficiencies without unnecessarily creating additional capacity for new growth; and**
- c. Third, to support **rural-serving** sustainable economic development that is sized and scaled at levels appropriate for Rural Areas and Natural Resource Lands and does not foster urbanization.**

JOINT RURAL AREA TEAM COMMENTS

R-403 *In the Rural Area and Natural Resource Lands, standards and plans for utility service should be consistent with long-term, low-density development and resource industries. Utility facilities that serve the Urban Growth Area but must be located in the Rural Area or on Natural Resource Lands (for example, a pipeline from a municipal watershed) should be designed and scaled to serve **primarily** the Urban Growth Area. Sewers needed to serve previously established urban “islands,” Cities in the Rural Area, Rural Towns, or new or existing schools pursuant to R-327 and ((F-264)) F-262a shall be tightlined and have access restrictions precluding service to other lands in the Rural Area and Natural Resource Lands... [Note: The use of the word “primarily” in the second sentence is not firm and is superfluous, since the policy already refers to “facilities that serve the UGA.”]*

V. Rural Commercial Centers

((B-)) Rural Towns

p. 3-37:

We proposed the following **deletion** in policy **R-506**. Since Black Diamond is considered a “City in the Rural Area” (see p. 3-38 and various maps) and is in the process of *quintupling* (not a typo!) its population and its overburden on State and King County roads, the development density in Rural Towns should not approach that achieved in Cities in the Rural Area.

R-506 **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 achieved in Cities in the Rural Area, when appropriate infrastructure is available.**

((G-)) Cities in the Rural Area

p. 3-39:

While we agree with the following policy:

R-510 **King County should work with Cities in the Rural Area to:**

...

b. ((m))Minimize the impacts of new development on the surrounding Rural Areas and Natural Resource Lands;

JOINT RURAL AREA TEAM COMMENTS

...when it comes to Black Diamond, a City in the Rural Area growing at an extremely rapid rate and slowing through its agreed-to Growth Targets, King County is completely helpless to implement this policy in any meaningful way.

((D-)) Non-Resource Industrial Uses and Development Standards in the Rural Area

p. 3-40:

While we requested some of the following changes to Policy **R-513**:

R-513 **Rural Public Infrastructure Maintenance Facilities, and agriculture and forestry product processing should be allowed in the Rural Area. Other new industrial uses in the Rural Area shall be permitted only on existing Industrial zoned properties in Rural Towns and ~~((in the designated industrial area adjacent to the Rural Neighborhood Commercial Center of))~~ the Preston Industrial Area.**

...we still have some concerns. While we understand KC Code **Title 21A.06.1014F** allows Materials Processing Facilities and Composting Facilities such as Cedar Grove Compost, etc., we also note that according to KC Code Title 21A08.080--MANUFACTURING LAND USES, Materials Processing Facilities are permitted (Condition 16) "*Only [on] a site that is ten acres or greater and that does not use local access streets that abut lots developed for residential use*" or subject to a Conditional Use.

Given the history of Wineries / Breweries / Distilleries (WBDs) which claim to do "*agricultural processing*," we recommend clear definitions be established for what is meant by "*agriculture and forestry product processing*." Specifically, we recommend a definition that states: "*Processing applies to agriculture or forestry products grown/produced within King County. It does not apply to raw materials that are trucked in from other locations to be processed at industrial facilities in the King County Rural Area.*" If definitions are *not* tightened up, potatoes grown in Eastern WA could be shipped to a potato chip factory in the Rural Area.

p. 3-40:

We support the following Policy and its proposed modifications:

R-515 ***Existing industrial uses in the Rural Area outside of Rural Towns(~~(, the industrial area on the King County-designated historic site along State Route 169 or the designated industrial area adjacent to the Rural Neighborhood Commercial Center of Preston))~~ without Industrial zoning currently shall be zoned rural ((residential)) area but may continue if they qualify as legal, conforming and/or nonconforming uses.***

We thank the Executive's Office for making the above changes, which we specifically requested, but to *complement* them and to *reinforce* other Rural Area policies herein—that seek to protect fragile

JOINT RURAL AREA TEAM COMMENTS

ecosystems and, especially, those in which the County has invested much money, effort, and time, we recommend adding the following **new** Policy:

R-515a To protect the Cedar River ecosystem, King County should pursue elimination of all Industrial Zones along the Cedar River by requiring redesignation of the Industrial Zones either upon sale of the properties or upon agreement of the property owners.

~~(VI.)~~ Natural Resource Lands

~~D.)~~ Agriculture

~~(1.)~~ Protecting Agricultural Lands

pp. 3-72 to 3-73:

We support the following ERP-proposed changes (Policies **R-656a** and **R-656b**). However, we urge that the *exception* for removal of land from one APD and replacement in another APD should *only* be exercised by a governmental entity for purposes of public/resource benefit or for essential utility needs and should not be used by private entities (individuals or non-utility businesses) for any purposes that would enable increased development on APD lands. This stipulation is particularly important to protect the APDs under the most risk of urbanization such as Lower Green Valley, Sammamish Valley, etc.

R-656a King County may only approve the removal of land from the Agricultural Production District if it is, concurrently with removal of the land from the Agricultural Production District, mitigated through the replacement of agricultural land abutting the same Agricultural Production District that is, at a minimum, comparable in size, soil quality, and agricultural value. As alternative mitigation, the County may approve a combination of acquisition and restoration totaling three acres for every one acre removed as follows:

- a. A minimum of one acre (~~must~~) shall be added into another Agricultural Production District for every acre removed; and**
- b. Up to two acres of unfarmed land in the same Agricultural Production District from which land is removed shall be restored for every acre removed.**

Replacement land to comply with the requirements of this policy may be acquired added to the Agricultural Production District in advance of removal of land from the Agricultural Production District, rather than concurrently, if the criteria in R-656b are met.

JOINT RURAL AREA TEAM COMMENTS

- R-656b Replacement land required under R-656a may be acquired and added to the Agricultural Production District in advance of removal as follows:**
- a. The mitigation is for a public agency or utility project consistent with R-655;**
 - b. Property proposed to be added to the Agricultural Production District is approved by the Department of Natural Resources and Parks to ensure compliance with R-656a;**
 - c. The subsequent map amendment to remove the Agricultural Production District land identifies the previously added land being used for mitigation; and**
 - d. The Department of Natural Resources and Parks tracks the acreage of advance additions of replacement land and subsequent removals to ensure that the requirements of R-656a are met.**

pp. 3-81 thru 3-87:

((E-)) Mineral Resources

We see an issue with mining uses being converted to *non-resource* uses (such as hobby farms, clustered housing, etc.), rather than what the County Code and KCCP Policies intend, i.e., those lands, on completion of mining, are to revert back to the rural forest resource land base. This has resulted in *permanent* loss of our rural resources land base. It also further fragments habitat for both plants and animals and decreases our ability to respond and adapt to climate change. In fact, mining resource land conversion to *non-resource* uses conflicts with both some of our oldest and some of our newest land-use policies for the Rural Area.

Below we have copied and pasted the *text* of this section (for easy reference we identify pages and line numbers of same) with the ERP-proposed changes intact and provide our recommended additions/strikethroughs **highlighted** and *supporting rationale* included in **[COMMENT]**.

Please note we recommend adding ten new policies **R-6aa** through **R-6jj**.

ERP Text (p. 3-81, Lines 3116 thru 3127):

King County contains many valuable mineral resources, including deposits of sand, rock, gravel, silica, clay, and metallic ores. Mineral extraction and processing these deposits is an important part of King County's economy, currently providing hundreds of jobs and producing materials used locally, regionally, and nationally. ((Mineral extraction also has historic significance, in that it provided the impetus for past development in many parts of King County, including Black Diamond and the Newcastle area.))

*King County is required by the Growth Management Act to designate and conserve mineral resource lands and plan appropriately to protect them. **The County shall prioritize sites with the least impact to the environment, public health and safety, and current adjacent land uses. The focus should be on***

JOINT RURAL AREA TEAM COMMENTS

sites outside of sensitive areas, with the least environmental impacts and reasonable access to infrastructure to get the minerals to where they will be used. King County shall convene a process to develop selection or de-selection criteria and do a comprehensive review of all the designated and potential mine sites in King County. This should be completed in the next 5 years. The criteria should include the highest collective impacts based on Best Available Science, risks to public health and the environment, and risk and wear to public resources such as roads, water, rivers, and parks. The last time this was undertaken was 1994. The process should identify sites that have never been active, are active, or are in reclamation. Once this is complete, a process of removing inappropriate sites should be undertaken. This should use Best Available Science and current location information. Sites that are in Sensitive Areas and undeveloped, should be re-designated or considered for a conservation purchase. Established, working sites closer to where materials are used should be encouraged and preserved. In doing so the County must assure that land uses adjacent to mineral resource lands do not interfere with the continued use of mineral resource lands in their accustomed manner and in accordance with best management practices. ((The policies in this section explain the steps taken to designate and conserve mineral resource lands and provide direction on the comprehensive review needed before additional sites are designated for mineral resource extraction.

[COMMENT: Most of the potential surface mineral resource sites were designated three decades ago (1994), and now residential development, as well as climate change and other factors, including updated policies, have made these sites less viable for development of surface mine sites. The sites that have the highest negative impact, such as those on CARAs, in/near river corridors or next to established neighborhoods should be reevaluated on a schedule possibly along with KCCP updates. If impact is now deemed to have additional adverse consequences, as compared to the date of designation, or in light of current standards and policies, then those sites should be considered for removal from the list of potential surface mineral resources (yes, we understand that a number of actions must be taken to permanently remove mining sites from the resource site list). This helps the public and potential mineral site owners have greater transparency and certainty for future land-use decisions and investments. In support of the new text above regarding adjacent land-uses, we recommend adding the following new policy.]

R-6aa The County shall focus of conservation of proven mineral resources in the Forest Production District, as adjacent land uses are generally more compatible with mineral extraction than siting mines in the Rural Area.

ERP Text (pp. 3-81 thru 3-82, Lines 3129 thru 3151):

Four main steps are necessary to support and maintain local availability of mineral resources. First, mineral resource sites should be conserved through designation and zoning. Second, land use conflicts between mineral extraction, processing and related operations and adjacent land uses should be prevented or minimized through policies and assessment and mitigation of environmental impacts. Third, operational practices should protect environmental quality, fisheries and wildlife, in balance with the needs of the industry. Finally, mineral extraction areas need to be reclaimed in a

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

timely and appropriate manner, recognizing adjustments to the mine plan and revisions to permits can no longer be used to delay the reclamation process.))

The Mineral Resources Map identifies three different types of Mineral Resource Sites – Designated Mineral Resource Sites, Potential Surface Mineral Resources, and Nonconforming Mineral Resource Sites and Existing Mineral Resource Sites in the Forest Production District. The sites were identified in the 1994 King County Comprehensive Plan or in subsequent annual updates. Before the Mineral Resources Map is a table that contains information on each Mineral Resource Site parcel.

*((The Designated Mineral Resources Sites on the Mineral Resources Map satisfy King County's responsibility to designate and conserve mineral resources consistent with requirements of the Growth Management Act. All Designated Mineral Resources Sites have Mineral zoning. Most of the Designated Mineral Resources Sites shown on the map contain sand and/or gravel; however, a few contain other mineral resources such as silica, rock, stone, shale, and clay. The criteria used in the 1994 King County Comprehensive Plan called for designation of properties that at the time were either zoned outright for mining or those operating under an approved Unclassified Use Permit.)) In addition to the designated Mineral Resources Sites, the Forest Production District and Forest (F) zone preserves the opportunity for mineral extraction, **but recognizing mining takes land out of forest production, and reclamation is not fully effective to restore it to the same forest productivity that existed before the surface mining. Further, maintaining a critical level of ~75% forest cover in a specific watershed basin helps to maintain proper rainfall and supply of cooler water for areas designated as important for salmonoid habit per the Basin Planning process. Sites further away from watershed basin resources should be prioritized for development over sites that have greater impact on watershed resources.** Mineral extraction is a permitted or conditional use in the F zone. Because forestry does not preclude future mineral extraction, King County considers the Forest Production District as part of its strategy to conserve mineral resources.*

[COMMENT: In support of the new text regarding forest cover that we recommend adding above, we recommend adding the following new policy.]

R-6bb The County shall prioritize protecting forest cover, working forests, salmon habitat and watershed health when siting mining and mineral and gravel extraction. Sites further away from watershed basin resources shall be considered for higher priority for development over sites that have greater impact on watershed resources. When mining ends, a high priority shall be given to mining site forest restoration to the fullest extent possible.

[COMMENT: Mine reclamation is a big expense and if done correctly and safely, does not generate the same revenue to owners as the extraction phase. Mine operators have typically used mine plan changes and permit updates to delay the reclamation process, and often work to go out of business/bankrupt before full reclamation phase takes place. County Code needs to be implemented to discourage and, if possible, prevent this. Consequently, we recommend adding the following new policy.]

JOINT RURAL AREA TEAM COMMENTS

R-6cc The County shall permit mineral extraction sites to size mines only as large as needed, not necessarily using all the acreage available; reclamation plans shall be defined before development; and any subsequent changes to the permit or plan shall not delay reclamation by more than 25% of the period allowed on the original permit.

Below we recommend adding *new* ERP text and six *new* Policies (on the ten we are proposing). All to be inserted on p. 3-82, at line 3161.

Recommended New ERP Text:

The majority of the potential mining sites in King County are defined for sand and gravel or rock. The geology of King County is such that these types of resources are extremely plentiful, and there is not a need to preserve every potential site that has some sand and gravel or rock potentially available. However, we do need to define and preserve where these resources are plentiful, closest to where they are consumed, least expensive to extract, where impacts current and future are lowest to the environment, public health & safety and adjacent land uses.

[COMMENT: In support of this *new* text above regarding *preserving sites*, we recommend adding the following *new* policy.]

R-6dd The County shall define and preserve sites where key resources, such as sand, gravel, and rock, are plentiful, and closest to where they are consumed.

Recommended New ERP Text:

Transport of these heavy materials uses a lot of diesel fuel and is extremely carbon intensive. In the selection of these sites the County shall provide more consideration to minimizing haul distances and employing more cost- and energy-efficient modes of transport, such as barge and rail, over road transport, etc. Siting future mineral extraction closer to consumption will have a positive impact on meeting the County's climate goals, as mining is one of the most carbon-intensive industries in the County. Siting closer to consumption or to use rail or barge facilities more effectively, will also increase public health and safety, as well as reduce the expenditure of public funds to maintain the County's road network, by reducing haul truck road miles.

[COMMENT: Please note that an efficient example of using conveyers to barge transport is Glacier's large Dupont sand and gravel mine that delivers aggregate materials to downtown Seattle or West Seattle at a low cost per ton. There will be other benefits to reducing haul truck road miles, such as much less rubber dust from tires polluting our waterways and threatening

JOINT RURAL AREA TEAM COMMENTS

what remains of our salmon and orca populations. Consequently, in support of the *new* ERP text above, we recommend adding the following *new* policy.]

R-6ee To help achieve the County's Climate goals and to positively affect public health and safety, transport of heavy mineral-extracted materials, both to where they will be consumed, and to deliver materials for fill and reclamation, shall be considered in planning.

Recommended New ERP Text:

Clustering of mineral extraction operations of same or similar materials is another issue that needs to be better managed. The result is inefficient distribution of sites across the County or region – where again, the geology suggests these materials are present, even plentiful over most of our County and region, particularly as you get closer to the Cascade mountains. This clustering, tends to put more impacts on certain communities – impacts not equally distributed.

[COMMENT: The current process puts industry in the driver's seat and favors the big international major players such as LafargeHolcim (France/Switzerland), Martin Marietta (United States), LSR Group (Russia), HeidelbergCement AG (Switzerland), CEMEX S.A.B de C.V. (Mexico). The County needs to be more involved in deciding where and, especially, when to develop a new mine, rather than waiting for the chance that someone who happens to own land in a certain area decides to apply for the rigorous permit process. It makes more sense for the County to define when and where new sites are developed for mining aggregate materials, so that supply can be phased in when and where needed, and without excessive land resources being devoted to mineral extraction—at the expense of other land uses—at any one given time. Consequently, in support of the *new* text above regarding *clustering/distribution of sites*, we recommend adding the following *new* policy.]

R-6ff The County shall project the amount of mineral resources needed for medium and longer term growth, and where these materials are expected to be consumed. Such information shall be shared with affected communities for an informed discussion of which mines are targeted for expansion, which can be targeted to close, and approximately where more new mines are needed to meet future growth.

Recommended New ERP Text:

Complementary industrial activities, such as limited landfilling of inert materials, as part of mine operations, should only be allowed on an exceptional basis with separate permits and specific regulation and oversight. Only a small portion of the mines should be allowed to accept inert materials, as to reduce regulatory resources needed, and to discourage permitting new mines as a pretext for landfilling or similar commercial activities.

JOINT RURAL AREA TEAM COMMENTS

[COMMENT: Current practices encourage overfilling or excessive disposal activity during site reclamation. This has included acceptance of off-spec and contaminated materials that present future potential impacts and threats to human health and the environment. As a result, permit requirements to restrict off-spec and contaminated materials and limiting fill to pre-existing contours should be strictly enforced with substantial penalties for violations. In addition, reduction in fill to something less than original contours should be considered where that will meet the underlying goal of returning the site to its *pre-existing* zoned use, in most cases as forest resources land. In support of this *new text* above regarding landfilling on sites, we recommend adding the following *new policy*.]

R-6gg The County shall prohibit the importing wood waste from land clearing (e.g., tree stumps), construction & demolition waste, or any toxic substances at any mineral extraction site.

Recommended New ERP Text:

The mining/industrial-specific public complaint and monitoring process should help facilitate information gathering related to such activities. More effective alerts, and rapid sharing of information between County departments (e.g., Permitting, Public Health), as well as State Department of Resources and Ecology are needed to prevent illegal activities.

[COMMENT: In support of the *new text* above regarding *monitoring and complaint processes*, we recommend adding the following *new policy*.]

R-6hh The County shall offer a monitoring and complaint process specifically designed for review of mineral extraction or rural-industrial activities. This shall include public access to tools available to County inspectors, such as recent aerial imagery, LIDAR, test well reporting, and NASA TEMPO air pollution monitoring.

[COMMENT: The long-term impacts of such violations are so great, and allowing such parties to continue to apply for additional permits consumes an extraordinary amount of public resources, and distracts County and public from other issues and opportunities that also need attention. Consequently, we recommend adding the following *new policy*.]

R-6ii The County shall prevent and limit the privileges to apply for permits of owner/operators of mineral extraction who repeatedly fail to comply with permit conditions, county code, or state and federal laws and rulings.

ERP Text (p. 3-82, Lines 3162 thru 3160):

We recommend adding a sentence to the end of the following ERP paragraph:

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

*The Mineral Resources Map also shows Potential Surface Mineral Resource Sites. These are sites where King County may allow some future surface mining to occur or where the owner or operator indicates an interest in future mineral extraction. ((The Potential Surface Mineral Resources Sites shown on the map do not indicate the material. Because of the geology of King County, most valuable metallic mineral resources are located in the Forest Production District, and are therefore already protected from urban development.)) Identification of Potential Surface Mineral Resources Sites satisfies the Growth Management Act requirements to not knowingly preclude opportunities for future mineral extraction and to inform nearby property owners of the potential for future mineral extraction use of these areas in order to prevent or minimize conflicts. **The County will endeavor to inform affected communities in advance of set public comment periods and permit decisions.***

Recommended New ERP Text to immediately follow the text above (insert at line 3161):

Non-conforming sites need to be reviewed to latest science as they often have greater potential negative impacts. Efforts should be made to define sunsets for each of these sites with well-defined and funded reclamation plans, that cannot be delayed.

[COMMENT: Owners/operators of these sites have benefited from these sites for longer periods with less regulation to start up, so should not also be rewarded with the privilege to sell or transfer these as a mineral extraction operation. Instead, the considerable impacts of these non-conforming sites is best mitigated by full and proper reclamation of the site to the original/previous use and zoning of each property. Consequently, in support of the new text above regarding *non-conforming sites*, we recommend adding the following *new policy*.]

R-6jj The County shall review non-conforming sites based on the latest best available science so as to reduce their potential negative impacts. Sunsets for each of these sites shall be defined. Funded reclamation plans shall not be delayed.

ERP Text (p. 3-82, lines 3162 thru 3169):

The Mineral Resources Map also shows Nonconforming Mineral Resources Sites. These are sites on which some mining operations predated King County zoning regulations without appropriate zoning or other land use approval. Mining for these sites has not been authorized through a land use designation or zoning classification. These sites are shown for informational purposes only. Mining can occur on an identified site only if mining has been approved as a nonconforming use by the Department of Local Services - Permitting Division, and mining activities have received all other necessary permit approvals. Because the sites have not undergone formal review to be designated on the Land Use Map or zoned for mining, the sites do not have long-term commercial significance, and for which ownership cannot be transferred or sold as an on-going mineral extraction operation. Active reclamation for these non-conforming sites cannot be delayed with additional permits or changes, to bring clarity for owners and community of when each site will conclude/sunset. However, they can continue to serve mineral supply needs.

JOINT RURAL AREA TEAM COMMENTS

[COMMENT: Our immediate prior COMMENT on *non-conforming sites* provides our supporting rationale for the *new text* we recommend above.]

End of our comments and recommended Text and Policy additions/deletions for the **E. Mineral Resources** subsection.

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

4 - HOUSING AND HUMAN SERVICES

Please note that one of our Joint Team organizations, the *Vashon-Maury Island Community Council (V-MCC)*, due to limitations in its By-Laws, is unable to complete its review of the ERP at this early stage. We have encouraged the *V-MCC* to submit its comments separately when ready and fully approved and request the County Council strongly consider them. Consequently, we have *not* included any comments here on this part of the ERP that warrant specific *V-MCC* comment.

JOINT RURAL AREA TEAM COMMENTS

5 - ENVIRONMENT

Theme

- The County has excellent Policies to protect and enhance the environment.

Overall Comments

We find some strong policies herein, but they depend on how they are implemented, if and how periodic monitoring is funded and staffed, and that enforcement, when needed, happens. Our experience has been that each of these have been problems for many years and that structural changes will need to be considered before the County can truly honor the good policies herein. We are pleased to see the Climate Action Plan permeates every aspect of this chapter. Almost all Climate Actions are “*shall*” making the intent strong. The language throughout is updated to match current practices and the Climate Action Plan. New to the Climate Plan is Climate Equity and equity language is added throughout and strengthened with “*shall*.”

Specific Comments

p. 5-3:

This contains examples of very good overarching strategies:

Individual species protections under the Endangered Species Act continue to play an important role. At the same time, both nationally and internationally, many governments are initiating multi-species approaches aimed at conserving biodiversity. Biodiversity refers not only to plants and animals but also to their habitats and the interactions among species and habitats.

Protection of biodiversity in all its forms and across all landscapes is critical to continued prosperity and quality of life in King County. In fisheries, forestry, and agriculture, the value of biodiversity to sustaining long-term productivity has been demonstrated in region after region. ~~((With the impending effects of climate change, maintaining biodiversity will be critical to the resilience of resource-based activities and to many social and ecological systems. The continued increase in King County's population and the projected effects of climate change make conservation a difficult but urgent task.))~~ The protection and restoration of biodiversity and of a full range of supporting habitats is important to King County. King County will incorporate these considerations in its operations and practices, ranging from its utility functions (such as wastewater, solid waste and storm water management) to its regulatory and general government practices.

JOINT RURAL AREA TEAM COMMENTS

p. 5-4:

This contains another example of very good intentions that will need strong *implementation* through rigorous permitting and enforcement:

Untreated stormwater runoff remains the largest source of pollution to Puget Sound. Stormwater management requirements and practices continue to evolve, with greater emphasis on low impact development and green stormwater infrastructure that can mimic the natural functions of soil and forest cover in slowing and filtering stormwater runoff by infiltrating or dispersing stormwater onsite, or by capturing and reusing it. Modifying stormwater facilities, or building new ones in previously developed areas, is very expensive. The County continues to develop, apply, and update evidence-based tools to identify and prioritize actions to achieve the best outcomes for reducing pollution to Puget Sound.

We have been bothered for some time about the *single-species approach* (e.g., Chinook); however, there is strong language throughout to emphasize a *multi-species approach*, including on p. 5-5 below:

I. Natural Environment and Regulatory Context

A. Integrated Approach

p. 5-5:

Environmental protection efforts need to be integrated across species, habitats, ecosystems, and landscapes. Efforts to reduce flooding or protect water quality and habitat cannot work successfully in isolation from management of land use across the larger contributing landscape. Efforts to protect one particular species or resource type could be detrimental to another if such efforts are not considered in an ecosystem context. Protection and restoration of natural ecosystem processes provide the best opportunity to conserve native species.

We support this, but, as with all of this, *implementation* is key. As an example, in the Bear Creek basin, all the first properties bought under Waterways 2000 were inventoried by a biologist hired by the County (the Basin Steward hired and accompanied). These surveys were wonderful and were used as the basis of the Management Plans for the property and future restoration plans. Unfortunately, it lasted a very short time and many of the restoration suggestions have not been implemented. So how do we make this happen over a much bigger scale and longer time frame? Also, the Basin Stewards as originally conceived, were watershed based and strengthened and involved local private groups. Now they are primarily grant writers – great ones but a different role.

((H-)) Climate Change

JOINT RURAL AREA TEAM COMMENTS

((B-)) Reducing Greenhouse Gas Emissions

p. 5-21:

It appears the word “not” was inadvertently omitted below:

Government Operations

((E-205)) E-201 King County shall reduce greenhouse gas emissions from ((all facets of)) its operations and actions, including but not limited to those associated with construction and management of ((e)) County-owned facilities, infrastructure development, transportation, and environmental protection programs to achieve the emissions reductions targets set in ((E-206)) E-202 and to work towards the carbon neutral goal in F-215b.

IV. Land and Water Resources

A. Conserving King County's Biodiversity

1. Biodiversity

p. 5-38:

E-403 King County should develop a biodiversity conservation framework and conservation strategy to achieve the goals of maintaining and recovering native biodiversity. ~~((This framework should be coordinated with the Washington Biodiversity Conservation Strategy where applicable.))~~ King County should collaborate with other governments and private and nonprofit organizations on the creation and implementation of this strategy.

The underlined addition (moved from E-404) has been a good Policy, but, again, it is another thing that will not happen without a commitment to *funding* the work

3. Biodiversity Conservation Approaches

b. Habitat connectivity

p. 5-41:

JOINT RURAL AREA TEAM COMMENTS

E-410 *Habitat networks for threatened, endangered and Species of Local Importance, as listed in this chapter, shall be designated and mapped. Habitat networks for other priority species in the Rural Area and Natural Resource Lands should be identified, designated and mapped using ecoregion information about the county and its resources and should be coordinated with state and federal ecosystem mapping efforts as appropriate.*

During the very first meeting of the Bear Creek Basin Plan Citizen Committee the public came to ask how to deal with beavers—and that was 1987! Again, funding and real help is necessary.

D. Aquatic Resources

7. Beavers and Beaver Activity

p. 5-83:

E-499ii *King County supports the coexistence of beavers and people in rural King County. (~~King County should prepare a beaver management strategy to guide a program on issues such as where and how beavers and humans can co-exist with or without engineered solutions and where beavers should be excluded or removed.~~)*

We support this Policy and the proposed changes, but, again, we remain concerned there will be adequate *funding* and Staff to do it?

p. 5-85:

With respect to Water Resource Inventory Area salmon recovery plans the subject not policies **E-499K** and **E-499I**, we would prefer these to be “*shall*” rather than “*should*.” We are unsure what the criteria, other than intent is, for when to use which.

p. 5-97:

E-708 *King County should implement a framework for effectiveness monitoring of critical areas regulations, and use monitoring data to inform the future review and updates of its critical areas policies and regulations.*

We again have concerns about *implementation* and adequate *funding* to do so.

JOINT RURAL AREA TEAM COMMENTS

6 - SHORELINES

We see very few changes to Policies proposed herein with the exception of:

Environment Protection Policies

Shoreline Critical Areas

Geologically Hazardous Areas (Policies **S-624**, **S-626**, and **S-627** on p. 6-49)

Shoreline Use and Shoreline Modification

Shoreline Modifications

Shoreline Stabilization (Policies **S-774**, **S-774a**, **S-775**, and **S-776** on pp. 7-75 thru 7-76)

As these primarily represent *consolidation*, we have no comments.

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

7 - PARKS, OPEN SPACE, & CULTURAL RESOURCES

Theme

- The County has excellent Policies to protect and enhance parks and open space.

Overall Comments

As with Chapter 5 - ENVIRONMENT, we find some strong policies herein, but they depend on how they are *implemented* and *funded*.

As far as public involvement, King County seems to not be adequately staffed. As an example, Tina Miller used to organize, in partnership with the community, Restorations, etc. However, with her retirement, we are not aware of these continuing. Again, we remain concerned about implementation.

Another concern is funding sources, as King County Parks relies almost totally on the voter-approved Levy every six years and entrepreneurial events like concerts at Marymoor Park. It has not received General Fund funding for a very long time. Although we have confidence in the voters of King County, we still see Parks as vulnerable.

***** PLEASE NOTE THE REMOVAL OF ROMAN NUMERALS, LETTERS, NUMBER, ETC. FOR SECTION / SUBSECTION TITLES WAS NOT FOLLOWED IN THIS CHAPTER AS IT WAS THROUGHOUT ALL THE OTHER CHAPTERS, ETC.**

Specific Comments

I. Parks, Recreation and Open Space

B. Components of ~~((the Regional))~~ King County's Open Space System

3. Regional Trails ~~((System))~~ Network

pp. 7-6 to 7-7:

P-109 *King County shall complete a regional trails ~~((system))~~ network, linking trail corridors to form a countywide network. King County will continue to primarily own the land necessary for the operation and management of the trail ~~((system))~~ network and pursue public-private funding opportunities for development and maintenance, while ensuring opportunities for access for all King County residents, both urban and rural.*

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

We believe the current system of regional trails is extensive, but unlike our neighboring counties of Snohomish and Pierce, the network primarily located in urban areas, within the UGA. There is an increasing need for the County regional trail system to further expand to fulfill the objectives of the Leafline Trails Coalition, in which the County is a major part:

- Provide more equitable access to safe places to walk and bike
- Offer reliable and healthy transportation options
- Grow the region's economy by adding jobs, connecting businesses to customers and employees, and providing millions of dollars in healthcare savings

Yes, Eastrail (see Policy **P-110**) is important and will be increasingly important for active transportation and commuting. Although, now and not later is the best time to renew efforts to complete connections in the rural areas of the County. Choices for right-of-ways are still available in the Rural Area, but residential development and increasing cost of land will soon make routing of new trails much more difficult. Further, now with e-bikes and other mobility options, these more rural trails can better serve dual use as active transportation infrastructure, as well as preferred recreation destinations for people from our more urban areas and tourists. Trails and Open Space passive recreation tourism is and will increasing be important for sustainable small-scale economic development in the Rural Area. The value of this tourism, both in public interest and dollars, builds environmental awareness and advocacy that will help us as a community to conserve our natural resources, such as river corridors.

Travel by bicycle and similar micro-mobility will become increasingly important as the population of our region grows, but inevitably roads and public transport cannot meet the demand. Commuting and travel by bicycle and micro mobility will become more convenient as the regional trail system builds out, and as road transport becomes overcrowded and less reliable. Trail are an important way people can connect to public transit, without the need or reduced need for a car, or for land for parking.

We encourage the County to shift its near-term focus on land acquisition, then planning and construction of lower-cost unpaved surface trails, then later, as budgets allow, upgrade these to higher specifications with pavement and bridges. The typical e-bikes and now popular gravel bikes allow greater use unpaved trails.

Consequently, we recommend the following *new* Policy:

P109a King County shall plan and further develop the Snoqualmie Valley Trail and Foothills Trail to enhance connectivity between cities in the Rural Area, as well as to trail systems in adjacent counties, and to facilitate statewide and national trail connection transportation routes. This effort includes partnering with Seattle Public Utilities to find a solution to extend the Cedar River Trail to Cedar Falls.

II. Cultural Resources

JOINT RURAL AREA TEAM COMMENTS

We recommend **additions** to the following *three* Policies in this section:

A. Relationships

p. 7-17:

P-208 *King County shall pursue its cultural resource goals by working with residents, property owners, cultural organizations, public agencies, Indian tribes, schools and school districts, **media** and others.*

P-209 *King County shall provide leadership in pursuing its cultural resource goals by actively advancing the protection, enhancement, and ongoing use of county-owned and other cultural resources, and by promoting intergovernmental cooperation and partnerships for the preservation and use of cultural resources. **King County shall reach out to citizens/organizations within their purview to facilitate cultural/heritage projects/goals.***

C. Historic Preservation

p. 7-19:

P-217 *King County shall acquire and preserve historic properties for use by ((e))County and other public agencies and shall give priority to, **and support efforts involved in, occupying historic buildings whenever feasible.***

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

8 - TRANSPORTATION

Theme

- The financial system for County roads is broken, needs of unincorporated areas are neglected, and city-to-city traffic uses Rural Area roads excessively.

Overall Comments

Here we elaborate on our Theme, in general, below and suggest in our Specific Comments (further below) how to implement improvements throughout **Chapter 8**. Separately, in **Appendices C and C1**, we offer suggestions for supporting technical changes. Additional technical work by the County would be needed to implement those suggestions.

We are pleased overall with the many improvements to Chapter 8 that were added since June 2023 Public Review Draft. Many of our general concerns have been acknowledged, but the much updated version still does not adequately serve and protect the unincorporated areas, both rural and urban. The unincorporated areas may contain “only” 11% of the countywide *population*, but they contain 100% of the *road system* over which King County is responsible. More must be done. We comment in particular areas below.

Structural Funding Problem:

The Executive's “*Recommended Plan*” (ERP) properly identifies the severe structural problem of inadequate funding for its road system – a long-standing issue brought about as an unintended consequence of vigorously implementing the state's Growth Management Act in areas of housing and land-use planning, along with the 1% cap on revenues, particularly property taxes. The ERP properly commits the county to seek regional and state level solutions, but previous efforts along those lines have been unproductive. Therefore, it is time for the county to take new actions it can control to address the real crux of the problem – the large volumes of urban commuter traffic using rural roads without paying for them to any real extent. Commuter travel between cities drives the unfunded need for maintenance now and total reconstruction later, as the transportation appendices clearly demonstrate.

We strongly encourage that, while still seeking state and regional solutions, the county immediately change its philosophy of road system management to:

- (a) Manage the existing road system so as to deflect *through-commuter travel* from lesser county arterials toward state highways and designated regional arterials, and
- (b) Increase the priority for use of *regional transit funds* to divert more commuter travel to transit.

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

While every change involves overcoming technical problems, it is imperative the county, at least, establish policy now to encourage and enable such changes.

Areas Needing New Direction

Road standards, level-of-service standards, and the transportation concurrency system are presently biased toward support of through-travel on county arterials. But rural county arterials are simultaneously the “*neighborhood streets*” of the rural area and should be managed as such rather than facilitate urban commuter use of rural area “*neighborhood streets*.” Road standards and operational practices should therefore focus more on preserving the local access function of county arterials in rural areas, and deflect more commuter travel toward state highways and selected regional arterials.

Nationwide, new directions are gaining momentum that broaden the focus of all transportation programs to serve more goals than just moving cars and trucks. Such initiatives as “*traffic calming*,” “*Complete Streets*,” “*Target Zero*,” and “*Safer Streets*,” among others, are popular in cities, but can be adapted to serve rural/unincorporated areas as well, to better support the population in those areas. The ERP vaguely acknowledges such initiatives. The KCCP should be more articulate with respect to stronger actions in rural/unincorporated areas that would help *maintain* rural roads for rural residents and *discourage* commuter traffic between cities from using rural roads.

Technical appendices document the funding shortfall quite well, and provide some guidance on how the county will prioritize road system management. Chapter 8 should include a summary of principal actions such as road closures that may be necessary in the near future, based on current law and assumptions.

We applaud and support efforts to measure travel in terms of *vehicle-mile-of-travel (VMT)*, and to support actions to reduce VMT for reasons of climate impacts as well as other more traditional reasons of regional planning. We believe that a VMT-based methodology could be the key to enacting new funding mechanisms on a *regional* basis, since VMT impacts are easily measured and forecast both regionally and locally. The state is moving toward a VMT-based road user-fee system to replace the outdated gas-tax system. Locally and regionally, VMT can be applied to create an equitable multi-modal and inter-jurisdictional impact fee system, as well as a simple and systematic concurrency system. The regional travel forecasting model of the Puget Sound Regional Council is the logical tool to utilize for such a system, by all jurisdictions. King County could be the leader in adopting such a system.

Specific Comments

Our recommendations appear as **red** when recommending changes to Text and **bold red** when recommending changes to Policies.

p. 8-1:

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

This chapter's opening paragraph should add words to acknowledge that the county road system increasingly serves travel between cities, on roads built for low-volume rural conditions, and the financial system for maintaining county roads is no longer viable for a number of reasons.

pp. 8-3 thru 8-5:

Creating an Integrated, Sustainable, and Safe Transportation System that Enhances Quality of Life

Introduction

Add this bullet point (with matching changes in supporting documents):

- Preserve and protect the Rural Area(s) and Natural Resource Areas from the impacts of increasing commuter traffic flows between cities, by such means as prioritizing the local access function of most county roads for residents of rural areas rather than serving through-traffic, by increasing transit service between cities, by seeking improvements on state highway corridors for intercity travel, and by implementing corresponding performance measures.

Conclude the Introduction with this additional sentence:

As elaborated in *Appendix C1 (Transportation Needs Report)* the projected shortfall of road funds will reach a crisis point by 2029, when the funds available fall below the need to sustain existing operations. If new funding sources are not established by then, some bridges may be taken out of service, some roads may not be maintained and/or may be closed, and the scope of other road services will be curtailed.

Transportation System, Services, and County Responsibilities

p. 8-10:

Road System

Conclude the opening paragraph of this section with one additional sentence:

However, if additional funding sources are not found within the next few years, it will be necessary to reduce the number of bridges, miles of roads, etc., the county maintains using the revenue sources available under current law.

p. 8-11 to 8-12:

JOINT RURAL AREA TEAM COMMENTS

Air Transportation

This discussion of airports is quite incomplete and lacking consistency. The region's two largest commercial airports are not even mentioned. Some, but not all, of the small general-purpose airports in the county are identified. GMA requires accounting for all facilities countywide regardless of ownership and operating authority. The prospect of an additional airport to relieve Seattle-Tacoma International Airport by 2050 must be recognized as a current issue. Great detail is not required, but locations and issues should be accounted for.

Add the following paragraphs and follow this pattern to account for other general purpose airfields and private airfields, such as those in Enumclaw, Auburn, and Vashon Island and possibly others.

Seattle-Tacoma International Airport is the ____-busiest commercial airport in the nation and a significant asset for the region's economy. Seattle-Tacoma International Airport is owned and operated by the Port of Seattle.

Renton Municipal Airport is owned and operated by the City of Renton and used by the Boeing Company and general aviation.

King County is not responsible for the operation of those airports.

End this section with the following at least the following information concerning a possible new airport:

The ability of Seattle-Tacoma International Airport to serve the region's air travel demand has been projected by the Puget Sound Regional Council to reach full capacity by 2050. The *Commercial Aviation Coordinating Commission (CACC)*, a state agency, researched potential locations for a new airport and found no suitable location, based on ground-side suitability factors. The state legislature in 2023 authorized a new *Commercial Aviation Work Group* to further evaluate increasing capacity at existing airports throughout the state, before considering siting a new airport.

A suggested policy on locating a new commercial airports in King County appears in the next section.

General Policy Guidance

p. 8-13:

Policy **T-106**, and the Strategic Plan to which it refers, should be amended to include:

As the provider of road services to residents of the unincorporated area, King County shall prioritize its limited funds to maintain local access and mobility for the residents of that area ahead of providing capacity for commuter travel through the Rural Area(s) and Natural Resource Areas, while pursuing regional strategies for funding of regional travel needs.

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

A new Policy **T-xxx** should be added, as follows:

T-xxx. A new commercial airport, when and if needed for statewide travel purposes, should not be located within the boundaries of King County because the airport capacity of Seattle-Tacoma International Airport is more than adequate to serve the needs of King County's total population, the land area needed would severely impact existing land uses, and the airspace needed would conflict with existing airports and/or nearby mountains.

At the bottom of this page, after the introductory paragraph under the next section (**Providing Services and Infrastructure that Support the County Land Use Vision**), add the following sentence:

This may include city-to-city transit service beyond existing plans, for the purpose of reducing commuter travel from outlying cities in the rural area. This multi-modal strategy is needed to reduce growth impacts on the rural area between the cities. Transportation actions of this kind would also comply with requirements of climate action legislation passed in 2023.

p. 8-15:

Providing Services and Infrastructure that Support the County Land Use Vision

Land Use and Growth Strategy

At line 468, for clarity and focus add the word "*unincorporated*" so the paragraph begins with "*The county's unincorporated urban areas, Rural Areas, and ...*"

At line 472 add to the sentence that ends with: "*providing safe and adequate roadways*" these additional words: "*and also preserving the rural lifestyle and character.*"

At line 474 add a new sentence after:

The vast majority of traffic growth on county is actually due to rising commuter traffic from cities at the outer edge of the region (and adjacent counties) passing through the Rural Area(s).

At line 475 follow the sentence ending "safe and efficient travel" with this additional sentence:

Additional transit resources may also be allocated to reduce vehicle-miles of travel in these corridors.

At line 477 add to the last sentence in this paragraph:

JOINT RURAL AREA TEAM COMMENTS

“...and to maintain adequate local access to existing land uses in the Rural Area.”

Policy **T-202** is good for its emphasis on preserving rural character. At the end add the following words to provide more tools: *“including increased fixed-route transit service to outlying cities and adjacent counties so as to reduce commuter travel through the Rural Area(s).”*

p. 8-16:

Travel Forecasts

Add to end of first paragraph:

The regional travel forecasting model does not consider growth in excess of the targets. Thus, while the City of Black Diamond has adopted much higher growth targets in its own comprehensive plan, the impact of that higher growth is not represented in the forecast volumes on state highways and county through the affected Rural Area.

pp. 8-16 to 8-17:

Public Transportation System

Add to policy **T-204** (or add a *new* policy?):

In addition, King County should seek to reduce traffic growth on county arterials through the Rural Area by increasing express transit services between the Cities in the Rural Area and the core cities of the Urban Growth Area.

p. 8-17:

Road System

Add at the end of Policy **T-207**:

“...and to decrease the use of county rural arterials by trips between Cities in the Rural Area and the core Urban Growth Area.”

p. 8-18:

Airports

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

This section needs expansion. It should account in some fashion more airports than just the three small airfields now mentioned. At least expand this list of rural general-aviation airports affected by King County land use actions to also include Enumclaw Airport, Crest Airpark and Evergreen Sky Ranch, and possibly others. Ideally, also add a policy to address King County land use policy affecting Seattle-Tacoma International Airport and Renton Municipal Airports, and take a pro-active position regarding a possible new regional airport.

Also, why are ferry operations inventoried in the appendices, and addressed later with policies T-301 and T-302 under Effective Management and Efficient Operations, but not accounted for in this section of chapter 8 relating to Services and Infrastructure that Support the County Land Use Vision? The later section assumes the county operates passenger-only ferries, but where is the policy in the T-200 series that spells out what the county's goals are for such service or why the county is investing in such services?

p. 8-19:

Level of Service Standards

Line 637 To the paragraph ending "*Level of Service C or lower,*" add the following text to better account for rural-area traffic operations and to comply with HB1151 which requires enactment of multi-modal policies:

To better account for conditions in rural areas affecting rural residents' mobility, an expanded multi-modal level of service method should be developed that accounts not only for congestion of through traffic, but also access delay to/from side streets and driveways, shoulder facilities for pedestrians and bicyclists, and transit availability. Each of those additional factors is more affected by high volumes of through traffic than by low volumes, and a level of service scale for each can be devised with a high LOS at low through volumes and a low LOS at high through volumes.

Broadening the definition of level of service to include all modes is both necessary and overdue. Appendices describe the "*Minor Arterial*" road classification as having a strong component of service to local access, making such roads more like Collector Arterials than Principal Arterials. Yet current county standards treat Minor Arterials and Principal Arterials interchangeably in terms of capacity, and show almost no differences in the County Road Design Standards. Rural conditions are not properly addressed by current design standards and a change to level of service standards is needed to bridge that gap.

p. 8-20:

Policy T-215

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

Finally, in all the unincorporated urban areas, we suggest “D” for the level of service standard, as LOS E amounts to capitulation to extreme congestion and fails to support local access and mobility.

Policies T-216, T-217, and T-218

We recommend a simplification to **apply the same LOS** (again, we prefer “D”) to all the designated urban and quasi-urban areas now given different LOS ratings. The distinctions among these subtly different types of quasi-urban land use are just too complex with little benefit.

Also add **Ravensdale** to the list of Rural Neighborhood Commercial Centers in policy T-218.

In our view, existing LOS practices sweep many issues under the rug and prevent proper planning to preserve the rural character. There is much to gain by creating level of service standards in the multi-modal fashion required by HB 1151. This will support local access and mobility as befitting rural character, provide support for regional approaches to traffic impact mitigation and concurrency, and support state funding for highways through the rural area. It would justify impact mitigation from new developments in adjacent cities that contribute traffic to rural arterials. It would also encourage the planning of corridor improvements that support local access turns rather than through capacity (turn pockets, roundabouts, etc.).

Revising the level-of-service standards will also not harm the prospects for construction of a single home on a single lot in rural areas, because the concurrency ordinance exempts developments of up to nine dwelling units.

pp. 8-20 to 8-22:

Concurrency

We object not to the policy *per se* but to the manner of measurement as defined in the concurrency ordinance. The current ordinance blunts to nothingness the very tool GMA prescribed to address congestion issues, and thwarts the county's ability to negotiate any kind of multi-modal mitigation from other jurisdictions for their impacts on county roads. The ordinance should be revised to be consistent with typical traffic engineering methodology by focusing on the speed of travel in the peak direction that is most congested, rather than take the average of peak and off-peak directions. The ordinance should then also account for level of service for multiple modes of travel as just detailed above.

For the KCCP Update we propose only to set the stage for that ordinance revision by adding some words (in **red**) to Policy T-222:

T-222 The concurrency test shall be based on the Level of Service on arterials in unincorporated King County using the County's adopted methodology, which shall account for multiple modes of travel including transit, bicyclists, and pedestrians as well as motor vehicles.

JOINT RURAL AREA TEAM COMMENTS

pp. 8-23 to 8-26:

Active Transportation Program

The discussion of Active Transportation is good for elevating the importance of this component of a complete transportation system. That is a good step toward implementing the “complete streets” philosophy of serving all travel modes together. But it is incomplete and misleading about the actual status of Active Transportation in unincorporated King County, especially the rural areas thereof. It gives the false impression that King County’s work program will actually deliver significantly toward the lofty goals of the policies. As well, policies can be improved for greater clarity as we itemize below, after some textual comments.

The Active Transportation Text consists of four paragraphs, which need reorganization. We recommend placing the second paragraph first, so the text defining Active Transportation comes first. Follow that with the paragraphs that discuss the Regional Transportation Plan’s emphasis on Active Transportation as an overarching policy, then the county’s emphasis to comply with that, and finally the county’s organizational roles and responsibilities. The entire text should be reorganized to address the topic separately for each of three systems separately:

- (1) County road system
- (2) Regional trail system
- (3) County transit system

Overall, we are disappointed by the urban-centric tone of the entire text, as it discusses both the regional trail system and the county road system. The scope must be broadened to account for the needs of rural residents, as well urban dwellers.

The regional trail system in rural areas is exalted as the centerpiece of county support for Active Transportation. And we who live in the rural area support the regional trail system. But our interest is not just for its recreational benefits, which accrue to both rural and urban residents. We value the regional trail system also (and perhaps even more) for its provision of safe routes for rural residents to commute long distances by bicycle! Lamentably the text describes that system only as a recreational service and fails to even mention the commuting aspect. Sadly, the text then has the chutzpah to justify the recreational system on the basis of providing a choice of modes – which only makes sense for the commuter function!

Next, the text describes the county’s role and responsibility for active transportation in unincorporated areas as if the matter was being properly covered, but fails to address how the unsafe conditions that now apply for active transportation on most rural arterials can or will be addressed. Reference is made to Road Design and Construction standards as if that ends the discussion. The reality is much less encouraging:

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

- (a) Most rural arterials are carrying high volumes of commuter traffic between cities, a traffic condition not expected to occur on rural roads, and both pedestrian and bicycle activity is commonly seen on all such roads.
- (b) The absence of shoulders in the presence of high traffic volumes, usually at high speeds as well, creates an unwelcome danger for active transportation in unincorporated areas, whether rural or urban in nature.
- (c) Most rural arterials lack the shoulders needed to support pedestrian and bicycle activity with effective separation from traffic, having been built decades ago to less complete design standards than now apply.
- (d) Future reconstruction to current standards is described in the text as the county's main "*solution*" to the present lack of facilities for active transportation.
- (e) The county lacks road funds to do more than maintain existing facilities, as clearly explained in the transportation appendices. Few if any improvements to add shoulders to rural roads can be expected in our lifetime.
- (f) There is no county policy, and no program, to identify and address this failing component of service to active transportation.

We therefore recommend that additional text be added to spell out the magnitude of the problem of missing shoulders on county arterials, and a policy be established to support efforts to better serve active transportation on county roads (see Policy T-233f below).

Candidly, we understand that funds will remain limited for a long time. But we believe that real progress could be made soon if policy direction authorized the Roads Division to consider interim improvements adhering to less than full design standards, at selected high priority locations. That can provide immediate benefits, long before total reconstruction of an arterial will be possible.

To be practical we propose that priority for interim improvements for active transportation be limited to locations of greatest concern to active transportation as measured by high traffic volumes, and lack of safe sight distance – i.e., blind curves and hillcrests, and known activity by pedestrians and bicyclists. It is at such blind spots that pedestrians, bicyclists and motorists encounter each other without warning and without ability to take evasive actions.

A strategy of interim improvements would provide real support to active transportation in rural areas long before any rural arterials could be reconstructed to current standards. And policy support is necessary so the Roads Division can execute the strategy.

Policy **T-230**. Good improvements so far, but add at the end a clearer articulation of the underlying principle:

JOINT RURAL AREA TEAM COMMENTS

"... consistent with the "Complete Streets" principle that a road is not "complete" unless it serves all user groups."

Policy **T-233**. Since most road improvement projects are likely to remain unfunded for many years due to the well-known road funding issue, the premise of previous policies to include active transportation in project design rings hollow. Add one more criterion to provide for a lower-cost strategy of small improvements where most needed:

"f. Interim projects to improve safety of active transportation using low-cost designs that deviate from the Road Design and Construction Standards, so as to allow meaningful improvements at short sections of road long before reconstruction to standards can be foreseen for the entire road. Interim projects may be considered for sections of arterial roads where traffic volumes are high, sight distance is below design standards due to horizontal or vertical curves in the road, and pedestrian and/or bicycle activity exists at any level."

Policy **T-236**. To further support the "Complete Streets" principle, add after "rural levels of service" the words **"... for all users."** This implies furthermore that rural levels of service will be defined and adopted by ordinance, in order to identify, prioritize, and execute actions suggested by policy T-233(f) directly above.

Policy **T-240**. Here emphasize again the evolving multi-modal nature of standards by adding at the end **"... for all users."**

Policy **T-243**. Add at the end: **"including the development of level of service standards for all modes."**

p. 8-27:

Transportation Demand Management

We are pleased by the mention of "active transportation" in several policies under this section. The concerns we raised just above are supported and accentuated by such mentions.

III. Ensuring Effective Management and Efficient Operations

p. 8-30:

Public Transportation Policies and Service Guidelines

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

The scarcity of text and policies for a program as large as Metro Transit is alarming. More guidance may exist in Metro's Strategic Plan, but shouldn't there be an *over-arching* policy in this Comprehensive Plan? Just one umbrella policy (**T-301**) is offered for transit, and that policy is so broad and all-inclusive as to be meaningless. It is ironic that three times as much verbiage is provided for the rather small element of passenger-only ferry service.

T-3xx. Please add enough distinct policies to guide the broad outline of how Metro provides public transit, and in particular to address particular requirements for transportation planning in compliance with the Growth Management Act.

Some particular issues require further discussion, next.

Responding to climate change is a particular concern of Metro's Strategic Plan for Public Transportation, according to the text. We assume that includes using transit to reduce vehicle-miles of travel by cars regionwide, but the sparse text doesn't make that clear.

T-3xx. Please add a policy here regarding Metro's response to climate change.

We would especially desire coverage of a particular way to implement that theme - by increasing transit service between outlying cities like Duvall, Carnation, and Enumclaw and job centers in the urban core. To our knowledge those areas receive low priority for transit based on maximizing system ridership, supporting equity, and other traditional concerns. But if the goal is to reduce carbon emissions, more attention should be given to commute patterns from outlying cities, a type of "low hanging fruit" from the emissions point of view. And we think that the goal of equity also applies, since the housing growth in outlying cities tends to be in that lower price range that serves "working poor" people who work in the urban core but can't afford to live in the urban core.

Commute trips from outlying cities are very long, obviously. Therefore each trip shifted from a car to transit removes an above-average number of vehicle-miles of travel, and with that the associated carbon emissions. This is not an appeal for more transit to rural areas in general. It is a call for targeted service between concentrated residential areas (outlying cities) and the job centers of the urban core. That kind of relatively fast express service could divert many commuters from cars. While initially directed at reducing road traffic and reducing carbon emissions for climate action, it would also primarily serve lower-income working families and thus relate to equity goals.

T-3xx. Please add a policy here regarding increasing Metro service to outlying cities because their growth is part of the region's growth policy, tends to serve lower-income populations, and the county's rural arterial network is not able to serve the resulting commuter pattern at present nor in the foreseeable future.

We understand that Metro's Strategic Plan must satisfy many priorities. If Metro cannot adequately address this environmentally critical commuter issue directly, then why not let others try? A policy framework could be adopted that permits innovative entrepreneurial efforts to supply what Metro cannot.

JOINT RURAL AREA TEAM COMMENTS

T-3xx. Please add a policy here that recognizes Metro's limited fiscal ability to serve all travel patterns in the region, and authorizes innovation by other entities, public and private, to experiment, innovate, and implement additional transit services of a targeted nature for specific travel patterns and rider populations for which Metro cannot for whatever reason prioritize adequate services to meet the need. Include of course "guardrails" to disallow services that directly compete with Metro by providing parallel services, and only allow services that attract additional ridership by reducing car travel, not by taking passengers from Metro.

p. 8-31:

Road Services Policies and Priorities

The first paragraph of this section references the fiscal issue but gives the false impression that the Roads Program has a handle on it. The looming financial catastrophe that is spelled out in the details of the **Strategic Plan** and the **Transportation Needs Report** should be directly incorporated. Remove weak language such as *"if sufficient revenue is not available then...."* Replace the sentence that begins *"if sufficient revenue is not available then...."* With the following:

As identified in the Transportation Needs Report, under current law and funding sources only 12% of the projected 20-year needs of this plan are assured. If new revenue sources are not found, then by 2029 all capital investment will cease and thereafter the maintenance and operating programs will shrink as well (Appendix C1 page 45). Strategies to address this fiscal shortfall are discussed in the next section of this chapter, "Financing Services and Facilities...."

p. 8-32:

First new paragraph, at line 1113, beginning *"While new streets..."* gives the impression that the County will make much needed improvements when the fiscal reality is that no funds exist to do such things. A more balanced presentation requires the following changes.

Replace the first half of the second sentence (*"Over time.....the County strives"*) with: ***The goal of upgrading roads is***. Add thereafter this new sentence:

Upgrading this aging road network to current standards meeting the needs of all modes of travel will take many years. Without new financial resources almost nothing can be done. Within available resources the Roads Division will follow the priorities of the Strategic Plan and make such upgrades only where safety and preservation needs are highest.

Keep the last sentence about shared responsibilities, but add this new sentence right after it:

JOINT RURAL AREA TEAM COMMENTS

For its part, the Roads Division will monitor safety conditions continually and close any road or bridge that cannot be maintained in safe condition according to adopted standards and constrained by available funding.

Next new paragraph, at line 1122, describes arterial classifications.

A discussion of our rationale follows:

The current classification scheme contains a number of changes from lower to higher classifications that were adopted in 2018 based on the Regional Transportation System Initiative report. The avowed purpose of that report was to address regional system capacity deficiencies. That study was under the auspices of the PSRC with participation of all four member counties; however, nearly all changes were made in King County at the county's sole request. The result was heavily biased toward using county rural roads to carry through traffic, regardless of adverse consequences on rural residents for whom those roads are their local access system. It blurs the distinction between Principal Arterials and Minor Arterials, to the detriment of preserving local access to rural areas. In hindsight a better outcome would have been to endorse upgrading state highways to carry the forecast burdens of future traffic growth between cities and through rural areas. Five years later, it is time to reverse some of those classification decisions in favor of the broader comprehensive plan and GMA goal of preserving rural character. This is also a compelling need due to the fiscal crisis facing the county road program. Therefore, completely replace this paragraph with the following three paragraphs:

Arterial Functional Classifications are established in Appendix C of this plan. The adopted King County Road Design and Construction Standards establish how design details differ for each road classification. While most county roads are currently in the Rural Area, some roads are urban in character yet still in unincorporated areas, generally close to the Urban Growth Boundary.

The current arterial classifications in unincorporated King County should be revised in order to elevate the primary GMA goal of preserving rural character against the growing adverse impact of through traffic between cities. Principal Arterial designations should be removed from roads that historically serve significant amounts of local access. The Principal Arterial designation should be limited to those few county roads that are main thoroughfares connecting cities and function in many ways the same as state highways. The Principal Arterial designation includes certain roads designated elsewhere in this plan as Rural Regional Arterials. Minor Arterial designations should be removed from roads that historically serve mostly local access, in favor of Collector Arterial status. The adopted King County Road Design and Construction Standards should similarly be updated to emphasize the priority on local access for rural Collector Arterials and Minor Arterials and include design concepts that discourage unwelcome through movements. Particular emphasis should be on shifting the design standards for Minor Arterials closer to those of Collector Arterials in keeping with the established definition of Minor Arterials that emphasizes a balance of local access and through movements.

Road standards should also be updated to acknowledge the multi-modal aspects of such initiatives as "traffic calming", "complete streets", "Target Zero" and "Safer Roads", and to provide

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

guidance for low-cost interim improvements that may be desirable long before a road can be reconstructed to full standards. Revisions should be completed within two years after the adoption of this plan.

Replace the first sentence of the next new paragraph, at line 1126, concerning Heritage Corridors with the following, to lend greater emphasis on preservation of these historic routes:

King County recognizes eight designated Historic Corridors where travelers can still experience a sense of the county's rich transportation history. Management of the County's road network should give priority to preserving the rural character and use of these roads and discouraging their conversion to commuter corridors between outlying cities and the urban core.

p. 8-34:

Policy **T-306a** about decisions regarding road closures and abandonments should include this additional priority: **"preservation of local access to adjacent property."**

Policy **T-310** should be revised to emphasize the primary role of Principal Arterials as service to through travel, versus all other classifications accommodating local access to various degrees. Replace the phrase "local roads" with **"local roads, Collector Arterials, and where possible Minor Arterials"** and replace the phrase "highways or arterials" with **"state highways and Principal Arterials."**

p. 8-35:

Policy **T-313** should add the following words after the word "infrastructure":

...and consider concepts of the Washington State Traffic Safety Commission's Target Zero initiative and the Federal Department of Transportation's Safer Roads initiative, so as to...

Policy **T-315** should add the following clause to the end of the first sentence:

...and by the design of access to and traffic operations within these historic corridors so as to discourage through movements and direct such traffic to other arterials.

p. 8-36:

Air Transportation

Recent studies by state agencies clearly indicated that it was not feasible on technical grounds to develop a new airport to augment Seattle-Tacoma International Airport after 2050 anywhere within King County. But agricultural land in the Enumclaw area that the county values and wants to

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

preserve by various other land use policies may remain attractive to some aviation interests due to its comparatively low purchase cost. Policy T-317c should be more clear about this, by adding to the end of that sentence: **"...provided that new capacity will be located outside King County."**

p. 8-37:

Climate Change, Air Quality, and the Environment

The opening sentence is grammatically distorted. Begin the sentence with a verb ahead of "Clean air" that is the object of the verb, to match the form of the second phrase "eliminating greenhouse gas emissions."

That detail aside, this section provides a good discussion and good policies.

The existential nature of responding to climate change cannot be overemphasized. But the ongoing conversion from petro fuels to electric battery power for vehicles will not meaningfully alter the amount of travel on county roads. It just changes the fuel that powers the vehicles.

Therefore management of the county road system to serve traffic movements is not directly altered by climate change concerns. In that context, it remains true regardless of fuels involved that any actions to reduce vehicle-miles traveled will have positive benefits, for reducing congestion, reducing road system maintenance costs, and reducing various other environmental impacts of vehicular travel. In fact such actions will be required for implementation of HB1181 enacted last year.

Financing Services and Facilities that Meet Local and Regional Goals

pp. 8-42 to 8-43:

Public Transportation Revenue Sources

This is a good discussion of Metro's financial status. It suggests that our proposal at p. 8-30 to increase Metro commuter bus service to outlying cities has little chance of being funded, however desirable the idea. That only accentuates the need for a flexible policy to encourage innovation by others, such as private sector commute buses, for any function that Metro is unable to fund with foreseeable resources.

pp. 8-43 to 8-45:

Road-Related Funding Capabilities

JOINT RURAL AREA TEAM COMMENTS

This is a good overview of the funding crisis affecting the county road program, but it lacks mention of ways to resolve the crisis that might follow from re-thinking what the county's operating policy should include. We are chiefly alarmed that county policy continues to support serving all traffic that comes to use all roads, when it is well known that the majority of users of county rural arterials are commuters between outlying cities and the urban core, passing through the rural area. These users pay ZERO for the use of county roads, but cause the deterioration of county roads which underlies the need to reconstruct arterials in the future at great expense, as shown in the Transportation Needs Report.

That situation calls for correction via regional funding. The regional growth plan allocated "urban" growth to outlying cities without considering the consequences for county roads. The region needs to mitigate those impacts on county roads, not King County. But history shows no progress in that direction after a full decade of efforts by King County to find funding solutions.

Without a *regional* solution to mitigate, it is time for the county to adopt a new policy direction consistent with that reality. We propose:

T-3xx King County will manage the rural road system primarily for the benefit of rural residents. King County will expect that commuter traffic between cities passing through the Rural Area will remain predominantly on state highway corridors plus a limited number of designated county Principal Arterials. County Road Fund resources should predominantly provide services to county residents and only minimally serve through travel by residents of cities.

T-3xx. King County will seek to develop regional and state partnerships to provide for the design, maintenance, and financial needs of city-to-city commuter travel through the Rural Area on designated county Principal Arterials and State Highways, and including therein actions to provide express transit service and implement demand management strategies.

That approach may seem radical, but is actually just a fiscal balancing act made necessary by the lack of alternatives. If the future reconstruction of the existing Rural Regional Arterials plus one or two other Principal Arterials were taken off the county's books, then the contents of the Transportation Needs Report would be significantly reduced, the looming fiscal deficit of the county would be greatly reduced, and road and bridge closures on roads serving county residents might be eliminated. Regional and State authorities would have greater visibility of the need to support those regional commuter arterials, and the elusive goal of finding new regional funding would be more clearly recognized by others.

We understand this change of direction will be hard to implement, but such policy shifts do take place from time to time when the need is clear. Now is the time for such a change.

p. 8-44:

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

Add to the end of the first paragraph (“*Regional Transportation System Initiative identified...*”) including the underlining of the paragraph:

That report used the capacity of many existing county arterials through the rural areas to provide capacity for through travel needs as the region grew. It elevated some Minor Arterials to Principal Arterials, and some Collector Arterials to Minor Arterials, to identify additional capacity for through travel. That was in hindsight not consistent with the goal to preserve the rural character, as discussed elsewhere in this plan. Going forward, the need to support through travel between cities should remain with State Highways and a few Principal Arterials designated as Rural Regional Arterials. The functional classification of other roads should be returned to lesser classifications, so as to emphasize preservation of rural character by elevating the priority for Minor Arterials and Collector Arterials to serve the needs of access to/from local streets and driveways rather than through travel. Principal Arterial corridors should also be managed to emphasize transit and travel demand management strategies related to long-distance commute travel.

After the third paragraph (“*Financial viability...*”) add this new paragraph:

In addition, a sober and realistic assessment should be undertaken and completed by December 2024 of what road closures and other changes will inevitably occur without new revenues. The Strategic Plan will be updated to include a prioritized list of specific actions at specific locations that will be taken, in four five-year increments, to manage the road system within the limits of current funding for the next 20 years.

Revenue Shortfall

p. 8-46:

Policy **T-405**, in the first sentence, change “**should consider**” to “**shall identify.**” At the end of this paragraph, add “**...and include a schedule for road and bridge closures and other service reductions based on the limitations of current funding.**”

We suggest adding a new Policy as follows:

T-4xx King County shall manage the road system in rural areas so as to first serve rural residents at an acceptable rural level of service based on access to/from local streets and adjacent properties, and use traffic management methods to encourage most long-distance through traffic between cities to use State Highways and designated Principal Arterials.

Regional Coordination

p. 8-48:

JOINT RURAL AREA TEAM COMMENTS

Policy T-501, change to

“King County shall advocate for regionally consistent financial strategies, coordination and partnership to address county-wide transportation issues, especially to protect the unincorporated area of King County from the adverse impacts of regional travel growth and to obtain new sources of road finance.”

Policy T-502, change “highways and arterial roads” to ***“State Highways and Rural Regional Arterials in order to preserve lesser county roads in rural areas primarily for use by rural residents.”***

Policy T-504, add ***“state agencies and”*** in front of “Puget Sound Regional Council.” At the end add:

“...and do not adversely impact the valuable and limited agricultural resources of the county's Rural Area – especially the Enumclaw Plateau.”

p. 8-51:

Public Involvement

We support vigorous efforts to engage all county residents for public input to the county's planning processes. All unincorporated area residents are directly affected by county decisions about rural roads. This population group merits clear identification in Policy T-511 using words like ***“residents of the rural and urban unincorporated areas”*** instead of the *indirect* allusion to “affected community members.”

JOINT RURAL AREA TEAM COMMENTS

9 - SERVICES, FACILITIES, AND UTILITIES

Theme

- Urban or urban-serving facilities should not be sited in the Rural Area.

Overall Comments

In general, we seek County Policies that are consistent with *not* siting urban or urban-serving facilities in the Rural Area. Such Policies would be consistent with those in **Chapter 3-RURAL AREA AND NATURAL RESOURCE LANDS**.

Specific Comments

((H.)) Facilities and Services

p. 9-5:

B-)) Urban and Rural Services

We recommend the **change** to the Policy below:

- F-209a King County ((will)) shall provide or manage local services for unincorporated areas, which include but are not limited to:**
- a. ((Building)) development permits and code enforcement;**
 - b. District Court;**
 - c. Economic Development;**
 - d. Land use regulation;**
 - e. Law enforcement;**
 - f. Local parks;**
 - g. Roads;**
 - h. Rural Area and Natural Resource Lands management assistance; and**
 - i. Surface water management.**

Permitting and code enforcement are closely intertwined. Thus, code enforcement is a local service that King County provides its residents to protect and preserve public health and our shared environment.

JOINT RURAL AREA TEAM COMMENTS

Also, please note that item “c. Economic Development” is not a “service” to be provided. The County provides services to obtain development permits, business licenses and permits, etc. that are *part* of economic development.

~~(G.)~~ Essential Public Facilities

pp. 9-13 thru 9-15:

We recommend **changes** to the following *three* Policies in this section:

F-227 *King County and neighboring counties*~~((, if advantageous to both,))~~ *should share essential public facilities to increase efficiency of operation*~~((- Efficiency of operation should take into account)),~~ including consideration of the overall value of the essential public facility to the region and the county and ~~((the extent to which, if properly mitigated,))~~ that does not further impact the community where the facility is located *whether expansion of an existing essential public facility* ~~((located in the county))~~ *might be more economical and environmentally sound.*

We also question *why* the “*if properly mitigated*” is proposed to be removed?

F-228 *King County should strive to site essential public facilities equitably so that no racial, cultural, or socio-economic group, or currently impacted community is* ~~((unduly))~~ disproportionately impacted by or benefits from *essential public facility siting or expansion decisions. No* historically and currently impacted *single community should absorb an inequitable share of these facilities and their impacts. An assessment of existing facilities should be conducted when siting new facilities. Siting* ~~((will))~~ shall consider equity~~((,))~~; *environmental justice; environmental, economic, technical, and service area factors. Communities with a disproportionate share of existing facilities* should shall *be actively engaged in the planning and siting process for new facilities* or the expansion of the existing site. *The net impact of siting new essential public facilities should be weighed against the net impact of expansion of existing essential public facilities, with appropriate buffering and mitigation. Essential public facilities that directly serve the public beyond their general vicinity shall* be discouraged from locating not allowed *in the Rural Area and Natural Resource Lands.*

F-230 *Siting analysis for proposed new or expansions to existing essential public facilities shall consist of the following:*
a. An inventory of similar existing essential public facilities in King County and neighboring counties, including their locations and capacities;

JOINT RURAL AREA TEAM COMMENTS

- b. A forecast of the future needs for the essential public facility;*
- c. An analysis of the **historical, current and** potential social, equity, health, and economic impacts and benefits and burdens to ~~((jurisdictions and local))~~ communities receiving or surrounding the facilities;*
- d. An analysis of the proposal's consistency with policies F-226 through F-229;*
- e. An analysis of alternatives to the facility, including decentralization, conservation, demand management, and other strategies;*
- f. An analysis of economic and environmental impacts, including mitigation, of any existing essential public facility, as well as of any new site(s) under consideration as an alternative to expansion of an existing facility;*
- g. An analysis of potential climate change impacts on the essential public facility, including consideration of sea level rise, and options for reducing climate change impacts on the facility, including locating the facility outside of the mapped 500-year floodplain along the marine shoreline (unless water-dependent, such as wastewater treatment facilities and associated conveyance infrastructure):*
- h. Extensive public involvement which strives to effectively engage a wide range of racial, ethnic, cultural, and socio-economic group, including communities that **have been or will be are** the most impacted;*
- ~~((h-))~~ i. Consideration of any applicable prior review conducted by a public agency, local government, or ~~((stakeholder group))~~ interested parties; and*
- ~~((i-))~~ j. To the extent allowable under the Growth Management Act, the locational criteria in policies R-326 and R-327.*
- k. An analysis, using recommendations from qualified agencies, such as the EPA, for sites appropriate for the public facility.***
- l. An analysis of historical regulation violations and public complaints filed with regulatory agencies, frequency, and resulting fines and/or mitigations (if any) of existing facilities where expansion is being considered.***
- m. A cumulative impact analysis to include all other facilities, public or private, that may pose exposures of chemical and/or non-chemical stressors, located near the proposed facility.***

Please note there is a "typo" in Policy **F-230a** below: "considerer."

F-230a For existing essential public facilities, King County should considerer potential impacts from climate change and identify and implement actions to improve resiliency and mitigate for impacts, including consideration of potential long- term relocation of facilities that are in the mapped 500-year floodplain along the marine shoreline (unless water-dependent, such as wastewater treatment facilities and associated conveyance infrastructure).

J-)) Solid Waste

JOINT RURAL AREA TEAM COMMENTS

p. 9-33:

We are glad to see the Executive has proposed improvements in the following Policy based partly on our July 2023 PRD Comments, but we recommend changing the “*should*” to “*shall*”:

F-270 King County **shall should maximize the capacity and lifespan of the Cedar Hills Regional Landfill and plan for future disposal when Cedar Hills Landfill closes to ensure no gap in service, subject to environmental constraints, relative costs to operate, ((stakeholder)) partner and public interests, and overall solid waste system optimization. A replacement landfill shall not be located in King County.**

However, we recommend the following additions:

F-270 King County **shall should maximize the capacity and lifespan of the Cedar Hills Regional Landfill seek and plan for closure of the Cedar Hills Regional Landfill in as timely manner as possible, and plan for future disposal when Cedar Hills Landfill closes to ensure no gap in service, subject to environmental constraints, relative costs to operate, ((stakeholder)) partner and public interests, and overall solid waste system optimization. A replacement landfill shall not be located in King County.**

The *current* **F-270** does not represent a policy to achieve closure of the Cedar Hills Regional Landfill. The County is in the business of representing its people, which involves taking care of its land as a resource and protecting its people's health. Further, a statement, such as “*maximize the capacity*” — What does that really mean? This philosophy has led the County to increase the landfill’s height over the originally designated 800 ft. It also could allow push back on the 1000-ft buffer. In fact, the County continually has tried to move into that buffer. “*Capacity*” is defined by footprint and airspace—and it's all subject to engineering. The County could decide to build large retaining walls to increase the height and, thus capacity—this had been proposed at one time—and could be again. “*Maximizing the capacity*” is far too *open-ended* and, thus, should be removed from this Policy, as we have recommended above.

The County needs to give greater attention and focus to the issue of closure of the Cedar Hills Regional Landfill. In past *decades*, deadlines have been unmet and *promises not kept*. A firm plan of action needs to be put into place in the near future. This plan, or legal vehicle, must provide residents in the greater Maple Valley area with not only transparency, but with a sense of confidence toward King County governance.

JOINT RURAL AREA TEAM COMMENTS

10 - ECONOMIC DEVELOPMENT

Theme

- The rural economy should not be endangered by allowing urban-serving businesses in the Rural Area.

Overall Comments

There are many instances where the County seems to be pushing “*rural economic development*” for the sake of rural economic development. We believe the County should follow the intent and the letter of the State’s Growth Management Act (GMA) and PSRC’s *VISION 2050* (our **highlighting** below).

WA—Chapter 36.70A RCW calls for:

Comprehensive plans—Mandatory elements—36.70A.070

(5) Rural element. Counties shall include a rural element including lands that are not designated for urban growth, agriculture, forest, or mineral resources. The following provisions shall apply to the rural element:

(b) Rural development. The rural element shall permit rural development, forestry, and agriculture in rural areas. The rural element shall provide for a variety of rural densities, uses, essential public facilities, and rural governmental services needed to serve the permitted densities and uses. To achieve a variety of rural densities and uses, counties may provide for clustering, density transfer, design guidelines, conservation easements, and other innovative techniques that will **accommodate appropriate rural economic advancement, densities, and uses that are not characterized by urban growth and that are consistent with rural character.**

(d) Limited areas of more intensive rural development. Subject to the requirements of this subsection and except as otherwise specifically provided in this subsection (5)(d), the rural element may allow for limited areas of more intensive rural development, **including necessary public facilities and public services to serve the limited area** as follows:

(ii) **The intensification of development on lots containing, or new development of, small-scale recreational or tourist uses, including commercial facilities to serve those recreational or tourist uses, that rely on a rural location and setting,** but that do not include new residential development. A small-scale recreation or tourist use is not required to be principally designed to serve the existing and projected rural population. **Public services and public facilities shall be limited to those necessary to serve the recreation or tourist use and shall be provided in a manner that does not permit low-density sprawl;**

PSRC’s VISION 2050 calls for:

JOINT RURAL AREA TEAM COMMENTS

MPP-RGS-13 Plan for commercial, retail, and community services that serve rural residents to locate in neighboring cities and existing activity areas to **avoid the conversion of rural land into commercial uses.**

MPP-DP-37 **Ensure that development occurring in rural areas is rural in character and is focused into communities and activity areas.**

Throughout every document—GMA, RCWs, *VISION 2050*, *Countywide Planning Policies (CPPs)*, and the *KCCP* there is a strong *consistency* in requirements, goals, policies, language, etc. to “conform with the rural character of the area,” “preserve rural character,” “consistent with rural character,” etc.

Consequently, we strongly urge the County to follow its very good policies when considering expanding so-called “*rural economic development*” beyond its identified rural economic clusters: Agriculture, Equestrian, & Forestry.

Specific Comments

~~(I.)~~ I. Overview

~~B.)~~ General Economic Development Policies

p. 10-6:

ED-102 ***The focus for significant economic growth ~~((will))~~ shall remain within the Urban Growth Area, concentrated in a network of regionally designated growth centers, ~~((while within))~~ In the Rural Area and Natural Resource Lands, ~~((the focus will))~~ economic development shall be focused on sustaining and enhancing prosperous and successful rural and resource-based businesses, as well as encouraging innovation and new businesses that support and are compatible with the rural economic clusters.***

We support these changes and wish to emphasize their implementation by County departments. New businesses in the Rural Area are to be “compatible with the rural economic clusters.” As identified in this chapter, these are: Agriculture, Equestrian, & Forestry. Consequently, the County should not allow such businesses as so-called “*Tasting Rooms*,” etc. in the Rural Area. We recommend adding the word “*innovation*,” as it is an important seed for new business development.

~~(H.)~~ Business Development

JOINT RURAL AREA TEAM COMMENTS

p. 10-10:

ED-203 King County shall proactively support and participate in programs and strategies that help create, retain, expand, and attract businesses that export their products and services. Exports bring income into the county that increases the standard of living of residents.

We recommend adding the word “*proactively*” to convey that respondent County departments shall seek contact and contacts, be responsive and accountable in problem-solving activities, and create problem-solving tools (e.g., videos and publications), and offer collaborative human networking communication skills.

VI.))VI. The Rural Economy

pp. 10-20 thru 10-21:

ED-602 King County should identify and implement (~~the Rural Economic Strategies Plan to guide future~~) rural economic development (~~and will modify and add~~) strategies (~~as needed to~~) that reflect the evolving nature of the rural economy, while protecting the traditional rural economic clusters.

- a.
- b.
- c.
- d.

e. King County is committed to ensuring that all economic development, including the provision of infrastructure, within the Rural Area and Natural Resource Lands shall be compatible with the surrounding rural character, be of an appropriate size and scale, and protect the natural environment.

This “*commitment*” rings hollow as there literally is no money for the “*provision of infrastructure*” in the Rural Area. Consequently, we recommend the following changes:

e. King County is committed to ensuring that all economic development, including the provision of infrastructure, within the Rural Area and Natural Resource Lands shall be compatible with the surrounding rural character, be of an appropriate size and scale, and protect the natural environment.

- f.

JOINT RURAL AREA TEAM COMMENTS

- g. King County ((will)) shall explore opportunities to support agricultural tourism and value-added program(s) related to the production of food, and flowers and specialty beverages (including beer, distilled beverages, and wine) in the RA and A zones of the county. Partnership venues should be educational and include information on the diversity of products available in the county and the importance of buying local, should seek to unify regional tourism efforts, and should encourage development of new markets for agricultural products and value-added goods.**

We are wary of the phrase “*agricultural tourism*,” which is ill-defined with unknown ramifications for the Rural Area. For example, who decides what is value-added and how? This must be defined. Further, if a product is brought in from outside the county, to what “*value-added programs*” is item **g.** above referring and how can imported products be considered beneficial to county production of food or flowers?

It is especially *inappropriate* for the County to once again be promoting “*specialty beverages*” production as part of the rural economy! This battle has been ongoing for over 20 years with continued attempts to open the Rural Area to *urban-serving* businesses that have no connection to agriculture or any production of food, flowers, or agricultural products that *require* a rural location. Such businesses clearly are *not* an element, nor should they be, of the rural economy. Any promotion of Wineries, Breweries, and Distilleries in the Rural Area directly violates the intent of Policy **R-324**, which clearly defines that “*no urban-serving facilities*” are allowed to operate in the rural area. Thus, to avoid a direct conflict within the KCCP, we urge removal of any reference here to “*specialty beverages*.”

- h.**
- i.**
- j.**

Please note we no comments on items **a.**, **c.**, **d.**, **h.**, **i.**, and **j.**

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

11 - COMMUNITY SERVICE AREA SUBAREA PLANNING

Overall Comments

We are pleased to see our previous requests to reduce the *overlap* between Community Service Area (CSA) Subarea Plans and KCCP Major Updates have been accepted and are proposed to be implemented as shown in the *Schedule of Community Service Area (CSA) Subarea Plans* table.

However, we do have a concern some Subarea Plans are now pushed out as far as a 2039 adoption —15 years from now! We recommend the King County Council provide additional funds to allow DLS-Permitting hire sufficient Planners (currently, we believe there only are two and they might have other duties) to conduct two CSA Subarea Plans *simultaneously*.

If this were done starting in 2024, subarea planning for the:

Greater Maple Valley/Cedar River CSA and the Fairwood Potential Annexation Area (PAA) could be run simultaneously (e.g., 2024-2026)

Bear Creek/Sammamish CSA and the Southeast King County CSA could be run simultaneously (e.g., 2025-2027)

Four Creeks/Tiger Mountain CSA and the East Renton PAA (e.g., 2028-2030)

This would represent up to a 5-yr change (i.e., sooner).

2024 KCCP Major Update Executive’s Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

12 - IMPLEMENTATION, AMENDMENTS, & EVALUATION

Theme

- Implementation of many good County Policies and Code is inadequate regarding permitting, land use, code enforcement, and other issues impacting development and uses on Rural Area parcels.

Overall Comments

We have seen over the years many problems with *implementation* of County Policies and Code—we have touched upon this in our Comments herein on other Chapters as well. Although the County, in general, has strong Policies and Code language, all too often implementation has been wanting. Either through poor interpretation, spotty followthrough, poorly funded and not-prioritized enforcement, and myriad exceptions / special considerations, the County does not give justice to those Policies and Code in practice on the ground to serve its residents.

Specific Comments

IV.) Land Use Designations and Zoning Classifications ((and Codes))

p. 12-12:

In the **Land Use Designation Table** (Note: it has no given title) for the “*Urban Growth Areas for City in the Rural Area (rx)*” designation under “**Zoning Classifications**” we see that following “*UR*” the sentence in parentheses regarding the City of North Bend UGA is proposed to be removed, as we requested in our PRD Comments. However, we still question why the “**Zoning Classification**” of “*Urban Reserve—UR,*” even exists?

V. Other)) Implementing King County Codes

p. 12-13:

Why is the following *text* proposed to be removed and apparently not replaced?

~~*Other development approvals include commercial or industrial construction permits. Review of land segregation, substantial development permits and other development proposals are key parts*~~

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

of the development process for making sure facilities and services to support potential development are adequate and for evaluating environmental impacts.))

Clearly, the process used to ensure facilities and services to support potential development are adequate and to evaluate environmental impacts is critical. Although the newly added paragraphs direct the reader to specific County Code Titles (i.e., “*Surface Water Management (K.C.C. Title 9), Water and Sewer Systems (K.C.C. Title 13), Roads and Bridges (K.C.C. Title 14), Building and Construction Standards (K.C.C. Title 16), Fire Code (K.C.C. Title 17), Land Segregation (K.C.C. Title 19A), Planning (K.C.C. Title 20), and Zoning (K.C.C. Title 21A)*”) that address various aspects of such a process, we find this process so important to helping to maintain the integrity and character of the Rural Area that it should remain and be further discussed here in Chapter 12.

p. 12-15:

We have never heard of the “*King County Zoning Atlas*” referenced in the following Policy (immediately above Policy **I-501**). It also does not appear when we search the County website.

~~((I-401)) I-500a The King County Zoning Code's ((zone)) zoning classifications and development standards and the ((official zoning maps)) King County Zoning Atlas shall be consistent with the Comprehensive Plan ((and functional plans)).~~

As an example of our earlier discussion above, we see far too many instances where the following Policy simply is ignored, especially related to road infrastructure, for which the County has *insufficient* funds to keep up with needed maintenance:

I-501 When needed infrastructure and facilities are not available in a timely manner, development approvals shall ((either)):

- a. ~~((b))~~Be denied ~~((or))~~;***
- b. ~~((d))~~Divided into phases~~((, or the project proponents should))~~; or***
- c. ~~((p))~~Provide the needed facilities and infrastructure to address impacts directly attributable to their project~~((, or as may be provided by the proponent on a voluntary basis))~~.***

p. 12-15:

We recommend the following changes to Policy **I-504**, as the Code Enforcement function currently is failing in its work, has broken processes, and cannot simply rely on complaints from the general Public. We cannot emphasize enough that the entire Permitting Division (both Permitting and Code Enforcement sections) requires revamping. This need should be reflected in KCCP goals underlying Policy **I-504** and elsewhere herein. The failure to effectively enforce and uphold County Policies and Code is a root cause of many of the major problems in the Rural Area facing both residents and government alike.

JOINT RURAL AREA TEAM COMMENTS

I-504 King County shall enforce its ((land-use and environmental)) development regulations by periodically assessing whether imposed permit conditions are being met. ((pursuing)) responding to code enforcement complaints and by providing ((oversight)) inspection services during the process of site development on all sites for which it issues permits.

We remain very concerned about the lack of code enforcement and the resulting impacts open people, property, health and safety, and our shared environment. Consequently, we reject, as unacceptable, the supporting rationale given for Policy **I-504**:

“Updated to reflect current practice: the County is required to enforce all development regulations, not just land use and environmental ones; K.C.C. Title 23 and associated resources does not allow for the County to proactively "pursue" complaints – the County responds to complaints; oversight implies more than what actually occurs, which is just inspections and monitoring of certain permit conditions when required.”

((VI-2016)) Comprehensive Plan ((Workplan)) Work Plan

pp. 12-32:

Action 1: Comprehensive Plan Performance Measures Framework Update.

As we described under our Comments in **Chapter 1-REGIONAL GROWTH MANAGEMENT PLANNING**, we fully support such an activity, but were not even aware it existed and produced a *Performance Measures Report* in 2022! We request more Public Notice and followup distribution of such reports. As we stated in Chapter 1, the items being measured should be reviewed *prior* to the next cycle described here.

pp. 12-32 thru 12-33:

Action 2: Comprehensive Plan Public Participation Code Update.

We support this effort. We have been pleased with the *Public Participation Plan* being followed during the **2024 KCCP Major Update**. We have fully participated in that effort and will continue to do so.

pp. 12-34 thru 12-35:

Action 5: Old Growth Corridors Strategies

We support this effort.

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

However, we do want to state the words “*Old Growth*” are misleading and would be better to use “*Old and Established Forests*.” The words “*Old Growth*” only should be used if the forest in question is *permanently designated as protected forest* and there is a plan in place to create a reference state of function, values, and diversity of species that will allow the subject forest to return to an *old growth* state after a couple hundred years or so. It is definitely not something that can be done on a five-year plan, or even a single human generation, and it would be misleading to have the Public under the impression that could be done.

Particularly in situations where, again, you have a drinking water supply in a forested area, they should also be taken out of commercial forest. In the long term it is much cheaper to let the forest and related soils filter and store the water while it is released to surface water, rather than trying to fix problems *after* the fact.

Further, the growth of a mono-species versus a diverse forest are very different things. We must improve the management and permanence of our established forests, especially along the waterways. Unlike the Douglas Fir monoculture areas (essentially, “*plantations*”), which are planted with harvest in mind, “*Old and Established Forests*” are those that have been left largely intact and provide buffers to clean water. That is the issue. These must be protected. We need to preserve our remaining “*Old Growth*” forests and restrict logging to second- or third-growth forests to be managed for forestry. We suggest the State Department of Natural Resources and, perhaps the KC Department of Natural Resources and Parks, look into increasing the target rotation from the current 40 years to at least 80. Then, institute *selective-cut* methods, as clearcutting is an anachronistic habit.

*** On January 11, 2024, we did meet with County Staff on this particular action and wish to thank them for a very fruitful conversation. We expressed our concerns as detailed above. We now better understand why the County is using certain terminology. We are on the same page. ***

JOINT RURAL AREA TEAM COMMENTS

Appendices

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

A - Capital Facilities and Utilities (Attachment B)

[Appendix A – Capital Facilities and Utilities \(Attachment B\)](#)

No comments.

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

B - Housing Needs Assessment (Attachment C)

[Appendix B – Housing Needs Assessment \(Attachment C\)](#)

Please note that one of our Joint Team organizations, the *Vashon-Maury Island Community Council (V-MCC)*, due to limitations in its By-Laws, is unable to complete its review of the ERP at this early stage. We have encouraged the *V-MCC* to submit its comments separately when ready and fully approved and request the County Council strongly consider them. Consequently, we have *not* included any comments here on this part of the ERP that warrant specific *V-MCC* comment such as the *Alternative Housing Demonstration Project* [[KC Council Ordinance 19119](#)] and the *Inclusionary Housing Program* on Vashon Island.

JOINT RURAL AREA TEAM COMMENTS

C - Transportation (Attachment D)

[Appendix C – Transportation \(Attachment D\)](#)

Overall Comments

The ERP's Appendix is updated from the summer 2023 Public Review Draft, *but only superficially*. For many topics, a sentence has been added pointing to a website for more information on the topic at hand. No new information has been directly added to the document itself.

We consider that an inadequate response to our request last summer for more substantive information on many topics - both in Chapter 8 and this supporting appendix. In order for the Comprehensive Plan to work as an effective guide to the county's work program for the next ten years, much more information needs to be expressly present in these documents. Most users of the Comprehensive Plan expect to find explicit information and guidance, not a link to another website that provides information created by others in a different context and not directly addressing the plan's actual policy issues.

Hoping for a better outcome in the final version when adopted, we are re-submitting hereafter the same comments we provided last summer, updated with more clarifications and specific recommendations and examples. There is an overarching need for King County to chart a new direction for managing its transportation resources. We think that better compliance with the Growth Management Act provides a good foundation of information to build on.

GMA anticipates the presentation of existing and future needs in a consistent manner, with analysis to show how future growth will be managed, balancing future needs with financial resources and level of service standards. To be perfectly clear, the pattern is:

- A. Existing conditions (supply and demand)
- B. Future conditions with growth (supply and demand)
- C. Future deficiencies (vs. level of service standards)
- D. Financial analysis (financial supply and demand)
- E. Revisions to the Comprehensive Plan to achieve financial balance

The level of detail should be simplified and summarized in the plan for brevity, supported by technical appendices. We do not call for massive documentation of arcane technical details in the plan itself. Appendix C-1 (Transportation Needs Report) is a useful start but more information is needed for roads alone. And to cover all modes, not just roads, all information needs to be summarized here and in Chapter 8 in a consistent manner that addresses the GMA outline.

Transportation plans in many jurisdictions are long on technical minutia and short on sensible high-level summaries that the public and elected officials alike can grasp and evaluate. But the fault may lie with the *tools of measurement* as much as any lack of effort. We encourage King County to explore ways to evaluate transportation systems with less attention to complex tools of traffic

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

engineering and more use of tools that require only a spreadsheet to tote up a series of parts that make the whole.

We recommend specifically, where roads are concerned, that an inventory of system usage be compiled in terms of vehicle-miles of travel (VMT) and system supply in similar terms as capacity-miles. That is a measure quite similar to the direction the state is taking for a future road user charge based on VMT that will replace the outmoded and failing gas tax as its main revenue base. The VMT method is simple to use for inventory and analysis of a large road system, in a spreadsheet. This is much easier than the complex analysis tools that traffic engineers use to evaluate road conditions one location at a time. The implementation of GMA in the 1990's innocently went the direction of traffic engineering, despite some early warnings against it. Time has shown that approach was a big waste of time and energy as far as system planning is concerned. The issue of growth management is a macro-level problem and needs macro-level tools for management purposes. The VMT concept satisfies that need. Ironically, even traffic engineers have historically used VMT when making high-level reports to policy makers. See for example the Highway Performance Monitoring System reports annually submitted by WSDOT to the Federal Highway Administration)

For other modes similar approaches can be worked out. Transit supply and demand is for a system is commonly described by bus-miles, seat-miles, and passenger-miles. Air travel for a system is also summarized in mileage-based terms.

Recent state legislation now requires local comprehensive plans to be multi-modal in scope (see RCW 36.70A.070(6)(A)), with multi-modal level of service standards. What we propose meets that need. But there is no effort made in this draft plan to provide multi-modal level of service measures, standards, nor analysis of future needs on that basis. That is a major deficiency.

To support the policy changes we recommended in the body of Chapter 8, supporting materials in Appendix C – Transportation need to be updated or expanded. We cannot provide the details of such technical work, but more attention is needed to the three topical areas of interest we suggested for Chapter 8:

- Needs of unincorporated areas are neglected
- City to city traffic uses rural roads excessively
- Financial system for county roads is broken

Some suggested adjustments follow under Specific Comments:

Specific Comments

I. Requirements of the Transportation Element

JOINT RURAL AREA TEAM COMMENTS

pp. C-3 thru C-4:

This section, *(I) - Requirements....*, is understood to be just a concise listing of how and where the Comprehensive Plan satisfies the requirements of the Growth Management Act per RCW 36.70A.070(6)(a), and not a presentation of that actual substantive information. Working within that understanding, we therefore point out below what additional information is needed to fulfill that intention. We understand that the actual delivery of such information will occur elsewhere in Chapter 8 or Appendix C or Appendix C-1. And since the county's purpose for this section is to show compliance with the RCW, we are obliged to list below several areas where the draft plan fails to account for a required RCW item or only meets a portion of a RCW requirement.

To that end, the following discussion is ordered strictly according to the RCW list of required elements. The ERP is ordered differently, and in our view not very logically. The RCW outline would be more effective.

- **(i) Land Use Assumptions used in estimating travel.**

The RCW plainly defines in its first line *"a transportation element that implements, and is consistent with, the land use element."* Therefore, please add here a summary table of the growth targets discussed in Chapter 2, Land Use. That is the foundation for the transportation analysis throughout the transportation chapter and appendices.

To be complete, please also include the forecast growth assumption for the unincorporated areas of the county as well as those city-by-city growth targets, whether that is an adopted target or just a forecast.

Because it has a great impact on county roads, please also include a statement about the City of Black Diamond's blatant disregard for its assigned growth target per the countywide policies, and indicate whether and how that reality is, or is not, accounted for in this transportation element. The traffic distribution of such growth is available in published documents of the City of Black Diamond, and that extra overlay on otherwise planned growth should be demonstrated in this plan.

- **(ii) Estimated Traffic Impacts to State-Owned Facilities.**

First re-label this section to comply with the actual RCW: *"Estimated multimodal level of service impacts to state-owned transportation facilities"*. Then expand the information to match that level of service objective rather than just provide a travel forecast of future volumes on state highways. That figure is only a start toward the larger discussion of level of service outcomes required by the RCW.

To fulfill that expanded requirement, add a matching figure of existing volumes (both as modeled and per actual traffic counts) from the same PSRC modeling source. Then provide a discussion of the amount of forecast growth that affects each state highway (e.g. in percentage terms). Then show exactly where level of service deficiencies are forecast that will lead to future demands on state highways. To avoid distorted analysis also make clear how you

JOINT RURAL AREA TEAM COMMENTS

account for the difference between base year modeled volumes and actual count volumes, when interpreting the future forecast volumes from the traffic model.

This is not a large effort, if organized and summarized by state routes, and use is made of available information at PSRC and WSDOT. There are just 13 state routes shown in Figure 6 that serve any unincorporated areas of King County. For each route just provide one line in a table showing the most heavily loaded location on each route now and in the future, and the level of service standard that applies. Then address the adequacy of that existing facility in the future, including any planned improvements that WSDOT considers fully funded and certain to be completed soon. All other details within the entire corridor are secondary to that major assessment of capacity, and can be summarized verbally. If necessary, divide a long corridor such as I-90 into two or three segments.

A table of that sort would serve the GMA end result to be an informative report to the state about future capacity needs in each corridor, and help shape the long range statewide system plan.

- **(iii) Facilities and Service Needs, including**

- (A) inventories of air, water, and ground transportation facilities and services, active transportation facilities, and general aviation airport facilities**

- These inventories are nominally accounted for by name in the ERP but are seriously lacking in the detail needed to be useful as a basis for analysis of future needs. We note that existing Metro Transit services and facilities are documented in quantitative detail, but other modes are sadly lacking in that respect. A standard approach for all modes would be most helpful. Less words, but more useful facts.

- Air**

- The inventory of commercial aviation facilities (ERP pp C-9 and C-10) needs to provide a quantitative measure that shows existing capacities and usage, as the basis for further discussion of future needs. This information should be available in various PSRC and state studies. Additionally, this section should be reduced in scope to address only commercial aviation and account for general aviation facilities in a separate section, if only to conform to the RCW outline, but also to give greater clarity to the separate needs of commercial and private aviation.

- Water**

- The inventory of marine transportation (ERP pp C-10 to C-15) is internally inconsistent, showing much more detail in some parts, and too little in other parts. No data is provided showing current or future demand, adequacy of current facilities and services, nor financial analysis. Standardization of the outline is needed, along the same lines previously described. See additional comments under the related section further below.

- Roads and Highways**

JOINT RURAL AREA TEAM COMMENTS

The discussion of roads and highways (ERP pp C-16 to C-19) amounts to a lengthy description of the work program of the Road Services Division, with heavy emphasis on current maintenance workload rather than responding to future growth. It fails to provide any discussion of the existing and future supply and demand situation of county roads, as GMA requires. For GMA purposes the context is mostly about providing new capacity for new growth, according to adopted standards for level of service. It is not about maintaining existing facilities, including reconstruction projects, however important that function is.

We understand the dire financial condition of the county road system, and consider that there is ample reason to use the comprehensive plan to document the number of deficiencies now existing, and the future projections, and the abject inability of the County Road Fund as currently structured to meet existing and future needs. We don't understand why this is not documented in the manner that GMA prescribes, showing the grave deficiencies just around the corner.

Transit

The inventory of transit systems (ERP pp C-19 to C-28) is more detailed than the discussion of other modes, including some text references to existing operations measured by service hours, and existing ridership numbers. It is somewhat overdetailed in its lengthy descriptions of every part of the Metro operations, and reads somewhat like a sales brochure proclaiming all the accomplishments of the system. We would prefer fewer words and more analysis comparing supply and demand for the existing operations and future projections of same. Surely such information exists within the organization and could be made public here.

Active Transportation

The inventory of active transportation (ERP pp C-28 to C-29) describes in considerable detail how Metro provides for bicycle parking at transit facilities, but those words contain no useful information for purposes of the comprehensive plan. We do appreciate how that service, rendered mostly in cities, as it can be helpful to residents of rural areas and the outlying cities as well for accessing the transit system to commute into the urban area without using a car. Unfortunately, this section has no discussion of supply and demand now and in the future, for that modal interface.

The Regional Trails System (which we also support) appears next with a similarly uninformative list of miles of trails. We know that funding to complete the planned trail system is not certain, so it would be helpful to have an additional discussion of the future financial prospects, as GMA expects. We suspect the funding of future project is not well established. So we ask, what are the impacts of not completing the system?

Roadside Active Transportation Facilities are a matter of great concern to the rural area, because of the great exposure on county arterials of pedestrians and bicyclists to high volumes of traffic at relatively high speeds. This section should provide a great deal more information about that exposure, inventorying the road system according to

JOINT RURAL AREA TEAM COMMENTS

degree of exposure, and discussing existing and future deficiencies, using the GMA supply and demand outline we offered above. We know the situation is bleak. We want more honest presentation of the issues in this plan. GMA provides the framework to show a progression from existing to future needs, standards to apply, and balanced solutions. We offer more detailed comments in a later section below and in the related appendix C-1.

General Aviation

No section by this GMA-mandated title is found in the ERP. Some references to general aviation are found in the current draft section on Air Transportation, and those items should be separated into a separate General Aviation section, and then further detail added to provide a complete listing of all such facilities countywide.

Rail and Freight

Interestingly, the GMA outline does not include this heading, but the ERP does address it at pp C-29-30. Much of it pertains to passenger rail service, which might be better addressed in the Transit section. Then this section would discuss only freight issues. Overall, the coverage is again lacking in factual information along the GMA supply and demand outline we stated at the start. A few simple facts obtained from others (Amtrak, Sound Transit, WSDOT) might suffice to touch on those points.

(B) Multimodal level of service standards for locally owned arterials, local and regional transit, and active transportation facilities [heading paraphrased for brevity]

The GMA now requires multimodal attention in the level of service standards. We see no attempt to meet that requirement. See additional comments in a later section.

(C) Multimodal level of service standards for state highways.

This has also not been discussed.

(D) Specific Actions and requirements [to satisfy Level of Service Standards]

This has also not been discussed.

(E) Forecasts of multimodal transportation demand and needs, for at least ten years, for cities, urban growth areas, and outside of those places.

This has also not been discussed.

(F) Identification of state and local system needs to meet current and future demands.

This has also not been discussed.

G) A transition plan for transportation per the Americans with Disabilities Act... to identify and remedy accessibility deficiencies.

This has also not been discussed.

- **(iv) Finance, including**

JOINT RURAL AREA TEAM COMMENTS

(A) Analysis of funding capability

(B) A multiyear financing plan

(C) If probably funding falls short, a discussion of [changes] that will be made to assure that level of service standards are met.

This has also not been discussed.

- **(v) Intergovernmental coordination efforts**

- This has also not been discussed.

- **(vi) Demand management strategies**

- This has also not been discussed at a useful level.

- **(vii) Active transportation component**

- This has also not been discussed at a useful level.

- **Level of Service Standards including Standards for State Routes.**

- A brief list or table of the standard that applies to each category of road would be much appreciated here. This table should provide the framework for the previous topic of estimated traffic impacts. We also comment elsewhere on how level of service standards should be re-stated for various reasons.

- **An Inventory of Transportation Facilities and Services**

- A brief list or table of the standard that applies to each category of road would be much appreciated here. This table should provide the framework for the previous topic of estimated traffic impacts.

Actions to Bring Facilities into Compliance

Much more work needed here to implement recommendations re: Chapter 8.

- **State and Local Needs to Meet Current and Future Demands**

- Clarify that funding needs have been identified but are NOT provided. Show the shortfall.

- **Intergovernmental Coordination**

- The City of Black Diamond's lack of cooperation with the region is NOT accounted for.

- **Active (Nonmotorized) Transportation**

- Add discussion of adequacy of service to such modes; add multi-modal level of service accounting for lack of shoulders on rural roads, add inventory of facilities throughout rural area not just designated trail system.

JOINT RURAL AREA TEAM COMMENTS

II. King County Arterial Functional Classification

p. C-4:

If the GMA outline used in part (I) above is followed, this section and subsequent sections would be relocated elsewhere. We do not attempt to trace that relocation, and only comment here on the material provided, as it is presented.

The given definition of Minor Arterials emphasizes the dual role of Minor Arterials with significant emphasis on local access; however, in practice the county manages Minor Arterials effectively the same as Principal Arterials, with respect to capacity. The rural area is not preserved or protected by this practice. Minor arterials are used instead as extra capacity for urban travel between cities, rather than to support access to rural areas.

This must change, by re-thinking what the system is about.

First establish the multi-modal level of service policy that GMA now requires. Consider concepts such as traffic calming, Complete Streets, Target Zero, and Safer Roads, and especially our discussion above and elsewhere regarding level of service based on roadside active transportation features present or absent. Based on that approach, significantly lower the level of traffic that would be permitted where active transportation is at risk. Recognize the full engineered capacity of Principal Arterials only when the needs of Active Transportation and Transit modes are actually present; i.e., when the facility meets all design standards.

Most of the arterial system today lacks roadside facilities for active transportation. Roadside facilities are presumably going to be provided when reconstruction projects take place, but at present, the level of service for active transportation is clearly not good (however it may be defined). That deficiency should mean that the allowable level of road traffic should be reduced, to be consistent with safety for active transportation. That is the change in thinking that needs to occur, to devise a meaningful multi-modal level of service policy. We offer more details about that in another section.

A level of service policy for rural areas should also limit through volumes on arterials so as to protect local access turning movements, where appropriate, with major distinctions between Principal Arterials, Minor Arterials, and Collector Arterials, to express their different levels of provision for local access. Road design standards would be revised as well to account for various ways that rural character can be protected in road design. To be blunt, we consider that the acceptable through volume for each class of arterial should work out (by whatever analysis method) to be approximately as follows for the typical two-lane road with complete roadside facilities for active transportation:

- Rural Principal Arterial – about 15,000 daily vehicles
- Rural Minor Arterial – about 10,000 daily vehicles
- Rural Collector Arterial – about 5,000 daily vehicles
- Rural Local Street – about 1,000 daily vehicles

JOINT RURAL AREA TEAM COMMENTS

Where the roadside facilities for active transportation are reduced or totally absent, the multi-modal level of service standard should show appropriate reductions in allowable traffic volumes. We discuss that further in another section.

Four specific Principal Arterials are currently recognized as Rural Regional Arterials, to recognize that they serve unavoidably high volumes of commuter traffic between outlying cities and the core of the urban area. Those cities include Duvall, Carnation, Black Diamond, and Enumclaw, plus other cities in Pierce and Snohomish Counties). These four arterials serve more or less the same city-to-city travel as state highways.

One other Principal Arterial may warrant designation as a Rural Regional Arterial in the near future between Black Diamond and Kent. That city has approved developments that grow beyond its regionally approved growth target by several thousand dwelling units, but that city accepts no responsibility to mitigate their traffic impacts on the county road system. That lack of responsibility is a gross violation of the principles of the Growth Management Act, but also demonstrates a failure of King County government to obtain effective mitigation from Black Diamond. Properly classifying this route would be useful to document the needs in that corridor, and seek mitigation from Black Diamond.

We urge King County to address such mitigation issues through a totally revamped regional approach to traffic impact mitigation, implementing a regional impact fee system that works across borders to involve the cities that cause the problems.

p. C-6 (map):

Preservation and protection of rural character demands reconsideration of this map. Some classifications shown in this map were adopted by ordinance in 2018 as a result of the Regional Transportation System Initiative (RTSI). Many of those changes should be reversed to protect the rural area. The RTSI project was ostensibly a PSRC regional endeavor but the study report consisted largely of changes proposed by King County to upgrade many routes so as to serve intercity travel purposes while downplaying their original and ongoing role as rural access roads. We recommend that some **Principal Arterials** be returned to their original status as **Minor Arterials**, and some **Minor Arterials** be returned to their original status as **Collector Arterials**.

The following routes should be reclassified downward to increase the protection of access to rural areas. In many cases these routes also fail to meet the criteria of the Federal Highway Administration for the classifications they now hold:

Revert from Minor Arterial to Collector Arterial

- West Snoqualmie River Road NE
- NE Carnation Farm Road – Ames Lake Carnation Road
- NE Union Hill Road
- 208th Ave NE
- 196th Ave SE
- 276th Ave SE/Landsberg Rd

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

Ravensdale – Black Diamond Rd SE
SE Lake Holm Road
SE Green Valley Road
218th Ave SE
212th Ave SE
284th Ave SE / Veazie-Cumberland Rd / Cumberland – Kanaskat Rd / Retreat – Kanaskat Rd
SE

Revert from Principal Arterial to Minor Arterial

May Valley Road SE
SE 228th St
Petrovitsky Road SE
Auburn-Black Diamond Road SE (west of Kent-Black Diamond Rd)
SE 400th St

The benefit of downgrading these classifications is to elevate the importance of preserving rural character and upholding the need of rural residents to have relatively less difficulty with access between the arterial system and their homes. Roads carrying high volumes of traffic would be flagged as deficient by the new multi-modal level of service. Road improvements to preserve access would be prioritized higher, and future deficiencies would be related to future growth and thus could be mitigated by a robust impact mitigation policy. In addition, the attention would be raised for the need to manage the future demand for intercity travel using transit and focusing on the state highway corridor and the Rural Regional Arterials. See additional comments in Appendix C-1, the Transportation Needs Report.

III. Regionally Significant State Highways Level of Service Standards

Figure 2 Highway Level of Service Standards continues to show a gross anomaly in that only one “rural” section of a Highway of Statewide Significance (HSS) in all of King County shows an “urban” Level of Service (LOS) of “D.” That section is SR-169 that proceeds east of the Renton Urban Growth Boundary to ~ 196th Ave SE/SE Jones Rd in the Rural Area. WHY ???

That section of SR-169 is treated as “urban,” when it should be “rural.” We recognize the LOS standards for regionally HSSs are determined by others, not King County. The standards given in *Figure 2* make sense overall, but there is this one rather egregious exception. On SR 169 east of Renton, the Tier 2 segment assigned LOS D extends too far eastward into the Rural Area, and should be redesignated as Tier 3 with a corresponding standard of LOS C. The appropriate location to terminate the Tier 2 segment would be at the Urban Growth Boundary line just east of 154th Place SE, a major signalized intersection. The ~two-mile section from there to 196th Ave SE all is within the Rural Area by definition, and parallels closely the Cedar River, a major salmon migration route where King County has invested millions of dollars in recovery efforts for salmon. Adjacent land uses are almost non-existent and consistent with rural character. It is inappropriate for this section of SR-169

JOINT RURAL AREA TEAM COMMENTS

to be designated Tier 2 and be given an urban LOS standard, as no other rural section of any state highway in Figure 2 has an urban designation.

Getting the tier categories correct is important to the entire Rural Area, to preserve the rural character as GMA requires. We note with great dissatisfaction that an asphalt facility was recently approved at a location within this two-mile section of SR 169, despite its lack of compatibility with the Rural Area. If the rural LOS standard of "C" had been applied instead of the urban standard of "D," the proposed asphalt facility would have failed to meet that standard, and approval of the plant would have had to be reconsidered with the attendant transportation mitigation.

IV. Transportation Inventory

B. Air Transportation System

pp. C-9 thru C-10:

If GMA is to be followed, all of section **B. Air Transportation System** needs a more comprehensive accounting of all commercial airports regardless of ownership. The ferry operations of several other agencies are inventoried under Marine Transportation System. The same level of inventory should be provided under Air Transportation.

A later section on future needs due to growth should provide a discussion of the issues currently being investigated by a new state commission that pertain to needs for new airport capacity statewide, to augment SEATAC after its capacity is reached.

See our earlier comments above and in Chapter 8 on same.

C. Marine Transportation System

p. C-10 thru C-15:

This section needs greater internal consistency and additional information to satisfy GMA requirements.

A map is shown of the entire state ferry route network, but there is no supporting numerical inventory, nor any description of King County specific operations, such as is provided next for ferry services operated by other entities. No user ridership data is provided for any of the services described, nor any discussion of future needs related to growth.

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

Missing from this section is any quantitative description of the state ferry system, such as is provided the next page for the Kitsap Transit Fast Ferry, the Port of Seattle Marin Facilities and Services, and the Northwest Seaport Alliance Marine Facilities and Services. A count of average ferry runs per day and ridership would suffice to document the ferry operations pertinent to King County by all operators. These statistics are surely as available from the operators.

Current shortages of state ferry vessels are in the news, and that crisis is reported to be long-lived as it takes years to design and build replacement vessels and to date the state legislature has not yet funded anything. Such deficiencies must be accounted for, along with future growth projections. Surely the state has ample information on the subject which can be reported here to satisfy GMA requirements.

To be more specific, only three state ferry routes exist in King County: Fauntleroy-Vashon-Southworth, Seattle-Bremerton, and Seattle-Bainbridge Island. To fully document the cross-sound supply/demand situation it is worthwhile to also include the Edmonds-Kingston route, since that route is barely north of King County and serves many King County residents in tandem with the Seattle-Bainbridge Island route.

There is no discussion anywhere in Appendix C of future growth needs for any of the ferry systems addressed. This is a clear deficiency that must be corrected, largely by reference to information from the operators themselves or from PSRC sources.

From the rural/unincorporated perspective, only the Vashon Island service is of direct interest. The role of ferry service to that island is huge, and needs to be maintained on a par with intercity highways in the road system. The relationship of Vashon Island ferry service to future Vashon growth needs to be addressed.

D. Land Transportation System

pp. C-16 thru C-30:

As a general comment on organization, we recommend that this topic be divided into a separate section for each of six modes of travel, rather than group diverse land transportation modes under this umbrella heading. There is only superficial logic to the current environmentally-based scheme of three levels using air, water, and land as the major headings. Better would be a mode-based scheme that places air, water, roads, transit, active transportation, and rail/freight on equal footing as headings, and follow the GMA outline more closely.

Roads and transit are the two most dominant systems requiring the most attention. Active transportation and ferries have significant interactions with roads and with transit. The air travel and rail/freight systems are arguably least interactive with other systems.

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

While this section purports to account for all forms of land transportation, the inventories are not even complete and there is no discussion of system performance, current conditions, adequacy and deficiency. The whole section provides no basis for establishing future needs as GMA requires, for any of the modes discussed. This is disappointing to say the least.

Some information about roads is found in **Appendix C-1**, but more should be provided there and summarized here in summary tables and analysis, such as the following. It should be tabulated geographically by Community Service Area and the rural and urban subsets of each unincorporated area:

- Road miles on each functional class of road
- Vehicle-Miles of travel on each functional class of road
- Average daily volume on each functional class of road
- Population of each community service area by rural/urban subsets
- Vehicle-miles per capita for each functional class of road

For context provide the same statistics on the same road classes statewide and countywide, using data from WSDOT's annual Highway Performance Monitoring System (HPMS) reports which is accessible online.

Such comparisons will show that rural roads in King County serve about three times the volumes found on similar arterials anywhere else in the state. That information alone will support directing future system management priorities toward serving the goal of preservation of rural areas, and underscore the need for new funding sources for truly regional system needs. The current management system is more oriented to asset management rather than to system performance, and so does not serve the goals of the comprehensive plan.

We understand the county's current financial crisis with road funding, and we do not wish for any facilities to fall apart for lack of maintenance. But as rural area taxpayers we are continually perplexed that the road taxes we pay are used by the current road management system to reconstruct arterials used primarily by through traffic between cities, thus serving primarily the commuters between cities who do not pay any taxes to pay for such improvements.

Priority should be instead to maintain and improve roads that serve local residents who pay the Road Tax, and to manage the rural road system through various strategies that would discourage through traffic from using such roads, except for a few designated regionally significant arterials that should be regionally supported. Please work toward reorienting road system management toward goals that serve county residents first. That is a direct application of the GMA goal of preserving and protecting the rural area.

We request in particular three specific changes in methodology for the evaluation of rural roads in unincorporated King County. Similar logic may apply to the urban unincorporated areas as well.

(A) Emphasize the access needs of rural residents first

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

Rural residents are seriously affected by through traffic from other areas. They have difficulty entering or exiting the arterial serving their neighborhood because of the high volume of through traffic. This situation is actually a violation of the county's rural level of service standard (B), if the traffic engineering methods are applied properly. When through traffic volumes are high but still running at the speed limit, access to and from side streets may be seriously reduced, and the level of service for such movements is at D, or E, even F in the worst case.

To account for that situation, the level of service analysis must actually look at the access movements as affected by the through movements. On that basis, the level of service for many side-street access intersections currently violates the LOS standard and should be mitigated - **now**. That is all according to standard traffic engineering methods.

Unfortunately the county has instead adopted a concurrency method by ordinance that only applies the LOS standard to a broad average of all through traffic in both directions and ignores all access conditions. That broad averaging method sets the level of service criterion so loosely that there are currently no deficiencies at all. This does not serve rural residents properly, and is blatantly disrespectful of the GMA policy to preserve and protect rural areas. This must change.

To be practical about implementing such a change and minimize new analysis work, we suggest to start that access issues arise chiefly on roads carrying more than about 5,000 daily trips. Rural arterials statewide almost never carry more traffic than that – that only happens in King County. And somewhere between 5,000 and 7,500 daily trips for through traffic, access delays become highly frustrating for local residents.

(B) Revamp Concurrency

The existing concurrency method is so weak as to be meaningless. It appears designed to avoid ever finding a level of service failure. That reduces the workload for county staff but does not serve the goals of GMA nor this comprehensive plan.

Most egregiously, it does not apply to the new developments that cause the road capacity problems we are concerned with – the growth in outlying cities that leads to commuter traffic through rural areas. It applies only to new developments in the unincorporated areas within King County. Also, embedded within the concurrency ordinance is an exemption for developments of under ten homes. That covers most new home building on existing or future lots in rural areas, since large subdivisions are not allowed by the rural land use code. So in effect most new home construction in rural King County would never be subject to concurrency. We must ask, why even bother with this ordinance?

Concurrency should be resigned to make it an effective instrument to highlight the problem of through travel growth between cities, with two parts. The current method of areawide averaging of travel speeds across all roads in a subarea should be abolished, in favor of a method targeting a selected few locations, as follows.

Part 1 should directly monitor only designated Rural Regional Arterials, and state highways. Those four Rural Regional Arterials and four state highways carry most of the traffic between cities through the rural area. We understand the need to treat these few regional arterials as quasi-highways. For

JOINT RURAL AREA TEAM COMMENTS

that matter, why not ask the state to take them over and make their function perfectly clear! In any case devise a multi-modal level of service standard (which GMA now requires!) that encourages a focus on increasing transit service between cities and applies the state highway LOS standard to the county's designated Rural Regional Arterials.

Part 2 should monitor all other county arterials. These all have lower volumes than the Rural Regional Arterials, but some carry so much through traffic that local access is significantly affected by through traffic volumes.

Through traffic cutting through neighborhoods is not tolerated in cities. Why should it be tolerated in rural areas where traffic is supposed to be light anyway?

Since these are all two-lane roads with only stop sign controls, there is no need for tedious detailed traffic analysis one location at a time. Instead adopt a simple traffic volume threshold as the LOS standard for all two-lane county arterials. That volume threshold can be identified by applying the county's rural LOS standard (B) just once, to a prototypical access situation to/from any side street or private driveway. That is where local residents experience daily the frustration of delays in accessing their own neighborhood. We expect that volume threshold will be between 5,000 and 7,500 daily vehicles. Elsewhere we suggested upper volume limits of 5,000 for collector arterials and 10,000 for minor arterials. The latter difference versus 7,500 would be reconciled by considering the lower number to apply with simple two-lane designs, and the higher level to apply with the addition of turn pockets or other access improvements.

For comparison, the county's four Rural Regional Arterials carry in excess of 15,000 daily trips. Congestion is high and side-street access is severely restricted, but that has been tolerated in view of the important intercity function these four routes serve. Such tolerance should not be true on other county roads where access movements should have higher priority than through movements. Applying an access-based level of service standard would immediately identify several county arterials as deficient, and call for remedies.

Typical solutions would range from installing turn pockets at key intersections to reducing speed limits and applying other travel demand management techniques to lower the attractiveness of these routes. It may even make sense to disrupt the continuity of some lesser routes to keep through traffic on the main routes designed to serve through trips. As well some of routes are on steep hillsides with a risk of landslides, so demand management actions to reduce through traffic on those routes helps minimize future hazards and reduce future costs for the county.

Demand management actions will inevitably shift some through traffic back to the Rural Regional Arterials and State Highways. That will in turn increase the need to upgrade those facilities to handle that additional traffic. But the funding of such regional needs should then come from regional sources. That will help reduce the county's financial shortfall with respect to its own road system serving mostly access needs not intercity commuters.

(C) Support active transportation in rural areas

JOINT RURAL AREA TEAM COMMENTS

Start by implementing a level of service standard for active transportation so as to monitor the degree of exposure for pedestrians and bicyclists of sharing a two-lane road with fast moving cars. Such a standard is needed for the rural area because roadside facilities for pedestrians and bicycles are generally absent, unlike in cities. But the reality is that the need for such facilities is seen everywhere. A few walkers and joggers and bikers are seen on virtually every county road, and they have no choice but to use the same pavement the cars do. On a low-volume "country lane" that is not a problem. On a county arterial used by thousands of commuters every day, it is a problem.

The prototypical "country lane" was in fact the "complete street" solution for rural areas in prior times. Think Amish country, where horsecars, bicycles, pedestrians, and cars all share the road. That worked because volumes were low and everyone had time to adjust to the presence of others. Not so in King County - not any more.

When traffic volumes rise, the inevitable result is diminished availability of the road for the walkers, joggers, and bikers, let alone Amish horse carts. Therefore, it makes sense to devise a level of service standard based on the degree of exposure to traffic for active transportation. The standard should consider the volume of traffic, the speed of traffic, the absence of paved shoulders or other facilities for active transportation, and also sight distance limitations at curves and hillcrests. Typically, the volume of walkers, joggers, and bikers is low everywhere but rarely zero. Their exposure to vehicles on the road must be recognized as a basic concern everywhere, regardless of their actual frequency of appearance. But recognize the popularity of certain routes for bicycle touring, and the increased pedestrian movements at neighborhood activity centers.

We suggest as one possible approach a point system to prioritize county roads according to total deficiencies, such as the following. Such point systems are commonly used by governmental agencies to prioritize many programs. Points could be assigned as follows:

- Each increment of 1,000 daily vehicles
- Each increment of 5 mph above 30 mph for average traffic speed
- Each two feet of paved shoulder (or pathway) missing from the arterial standard of eight feet.
- Each reduction of 100 feet of sight distance below a reference standard of 500 feet
- Active transportation activity above the norm

Using this scheme, the level of service standard would be defined as a maximum allowable point score. For example, a road with four feet of paved shoulder width, 35 mph speed, and 5,000 daily traffic would have a score of 8. That situation seems acceptable intuitively. Removing all shoulders would raise the point score to 10. That situation seems marginally tolerable at 5,000 daily traffic but unacceptable at 10,000 (score = 15). It also seems intolerable at 5,000 daily traffic if speed were 45 mph with no shoulders (score = 12). If sight distance were impaired by a sharp curve that would raise the score but only for the 500 feet each way from the center of the curve. The score would also be raised all along a corridor if that is a popular route among bicycle clubs, or a short portion of a route that is adjacent to a county park, local businesses, or other activities that generate pedestrian movements.

JOINT RURAL AREA TEAM COMMENTS

Some experimentation with alternative scenarios should be done before choosing a particular score for the LOS standard. Note that below about 2,000 or 3,000 daily vehicles, there won't be enough points from other deficiencies to rise to a matter of concern. Most of the 1500 miles of county roads is in this low-volume category, and such roads would not have to be monitored. The attention would be focused on the Principal and Minor Arterial systems.

The result of applying such a level of service standard to active transportation would be to identify those few locations on the county road system where exposure and conflict between vehicles and walkers, joggers, and bikers is highest, and suggest priorities for roadside improvements to remove such deficiencies. That would meet the intent of GMA for a multi-modal level of service that is relevant to rural areas. It furthers the cause of "complete streets" as well as state and federal priorities to improve safety on all public roads.

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

C1 - Transportation Needs Report (Attachment E)

[Appendix C1 – Transportation Needs Report \(Attachment E\)](#)

Overall Comments

This document provides an exhaustive inventory of roads and projected needs based on maintenance and asset management criteria, rather than GMA-oriented service needs. Also the approach is only countywide, not accounting for Community Service Areas nor rural and urban distinctions within the unincorporated area. It also does not suggest timing for any of the needs listed. The list simply accounts for (almost) all the miles of road under county control, and assigns various types of improvement to each road based on an ultimate future condition. This foundational list needs some discussion of when and why each improvement will be needed, to relate it to GMA.

To support the deficiency analysis we recommended in Chapter 8 (for the broken financial system for roads), the inventory of conditions should provide summary tables of the road system according to such key measures as functional classification, lanes, traffic volumes, shoulder width and other measures of support for active transportation, transit, and pavement condition. Summarize issues with findings like *X percent of Minor Arterial miles lack shoulders wide enough for pedestrians.* A summary table should be presented for each community service area, and countywide, all based on the future horizon year (PSRC's *VISION 2050*).

Such a methodology also would support the hard decisions needed to justify future road closures due to lack of funding.

Specific Comments

Chapter 1. Planning Context and Introduction

pp. C1-3 thru C1-9:

This chapter introduces and to some extent summarizes the following chapters. It should be updated as following chapters are revised.

Chapter 2. Unincorporated King County Road and Bridge Assets

pp. C1-10 thru C1-33:

JOINT RURAL AREA TEAM COMMENTS

The entire scope of this chapter is geared to asset management, rather than system performance. While asset management is import and directly related to the fiscal crisis before the county, GMA requires a discussion of system performance.

We suggest an additional section to be called “2.7 Multi-Modal Level-of-Service Standards and Deficiencies” that will provide the data we requested in the discussion of Chapter 8. This would include an inventory of roads with shoulders suitable for active transportation (or not), segregated by functional classification, traffic volumes, sight distances and other factors related to safety of pedestrians and bicyclists in particular, indicators of pedestrian and bicycle activity, and other factors related to a future multi-modal level of service measuring a system for how it meets rural needs, more than how it serves through travel.

The following presents a discussion of our rationale:

The goal is to establish a baseline of current conditions so as to monitor future changes and prioritize future actions to mitigate the impacts of growth. For the purposes of this report, such data could be summarized into tables that quantify the number of road-miles meeting various criteria, by class of road, by community service area, etc. Future conditions could be similarly summarized.

Obviously many county roads do not meet current road design standards, and those standards generally don't distinguish between urban and rural environments. Rural residents generally oppose sidewalks and other urban features, but do use their roads to walk and bicycle. Managing rural roads for multiple user groups is the issue, one that is addressed by “complete streets” philosophy. We anticipate that an improved level of service methodology would take into account that for low-volume roads missing or narrow shoulders are OK, but for high volume roads that is not OK. Higher volume roads in rural areas have transitioned from their historic rural character into a quasi-urban nature that demands some adjustment of standards.

This change from rural to urban is confronted in some suburban cities by a level of service approach that measures suitability for active transportation by the width of shoulders, and relates that to traffic volumes. See our discussion of a point system methodology for an active transportation level of service in our comments on Appendix C – Transportation.

We envision an improved Transportation Needs Report that would show an inventory of road-miles by level of service, in each community service area, for existing conditions and future conditions. A policy should establish what amount of deficiency is acceptable in each category, in a multi-modal framework as GMA now requires.

That would be a more useful approach to concurrency management for unincorporated areas (separating rural and urban parts too) than the existing system that only measures the speed of through traffic. It would establish a basis for separating existing deficiencies from future deficiencies due to growth, which could be mitigated by a regionally uniform impact fee on new developments anywhere in the county, such that developments in outlying cities would contribute toward their impacts in rural areas too. That is the power of a regional impact fee based on VMT, with proceeds directed wherever the VMT occur.

JOINT RURAL AREA TEAM COMMENTS

Chapter 3 Transportation Modeling

p. C1-33:

PSRC's regional traffic model has been used to identify future traffic volumes based on adopted growth targets. This information should be presented in some form in the TNR. Traffic volume maps are customarily used in comprehensive plans to document existing and future conditions. Volume growth trends are a useful tool for scheduling growth-related future improvements, at least in five-year increments over 20 years. We anticipate that in rural areas, only roads with volumes higher than perhaps 5,000 daily vehicles need to be so documented.

There is a need to also address violations of the adopted growth targets, specifically Black Diamond's refusal to abide by regional protocols. The current approach fails to address the worst case now before the region. That city's comprehensive plan anticipates well over 6,000 new dwelling units versus the region's target allocation of 2,900 units, and master planned development agreements to that effect are now being implemented with over 1,000 units already on the ground. Traffic impacts on county roads to/from Black Diamond are already in evidence, but under current law there is no way to prevent continuation of this trend. A start would be to run the PSRC traffic model with those additional growth assumptions so as to document the extent of traffic impacts.

The PSRC model has all the elements needed to quantify regional traffic impacts on the basis of VMT for any development anywhere. Such a powerful tool deserves to be used to fairly allocate regional funds of any kind to where VMT impacts occur, and do so across all jurisdictional boundaries. King County's financial dilemma would benefit greatly from such a system, but all jurisdictions would derive some benefit.

Chapter 4 Drivers of Change Affecting Transportation in Unincorporated King County

pp. C1-34 thru C1-37:

This section contains much useful information, but could provide much more by carrying out the thoughts expressed above with application to future year projections. This is what GMA anticipates. We are especially alarmed by the information on pages 38:

“congestion-related delay is expected to increase most significantly for urban unincorporated and rural areas” and “annual delay per capita in urban unincorporated areas is expected to increase to 53 minutes (a 20 percent increase) and to 63 minutes in rural areas (a 26 percent increase).”

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

These trends are quite the opposite of what a balanced GMA plan would entail, and especially far from preserving rural character. On page 40 (top) it is reported that

“Since 2006, less than 3 percent of new housing in King County has occurred in the rural area.”

Clearly, congestion in rural areas is an impact of city-to-city travel through the rural area, and not due to growth within the rural area. As the rest of page 40 makes clear, this growth is occurring without commensurate financial resources to offset the impacts. Something must change.

This section concludes with a bland statement that “*King County Roads will continue to...achieve scaled-up, regional funding solutions.*” This is not enough, neither to obtain solutions when nobody else has wanted to meet the challenge for the last several years that Roads has been documenting its fiscal plight, nor to satisfy GMA which calls for a demonstration of a fiscally balanced solution within the Comprehensive Plan. We call for satisfying GMA by demonstrating tangibly in the Comprehensive Plan what Roads will do in coming years to operate within its existing financial means. See Chapter 5.

Chapter 5. TNR Project Needs and Cost Analysis

pp. C1-37 thru C1-40: ???

This is a **chapter title** shown in the Table of Contents in the Transportation Needs Report (Attachment E), but not found in the body of the text. We believe it starts on p. C1-37 with the following paragraph:

“The 2024 Transportation Needs Report represents King County’s contemporary thinking regarding transportation needs across its system of unincorporated roads and bridges. The underlying approaches taken to identify needs and evaluate road and bridge assets are summarized within Chapter 2 of this report. This chapter provides the cost analysis associated with the 488 identified transportation project needs, organized using ten TNR categories:...”

and includes Figures 4., 5., and 6. Our comments follow:

The ten categories of projects listed on pp. C1-37-38 and summarized in Figures 4. thru 6. make sense as *management* categories, but there needs to be a clarification as to how these categories relate to the issue of growth. For compliance with the Growth Management Act only the projects that provide *new capacity needed for growth* are of interest. We do not wish to diminish the importance of structural reform of county road finance, a topic addressed in Chapter 6. But there needs to be a clarification here and in Chapter 6 as to which needs are related to growth - and paid for by growth in an ideal world – and which needs are related to ongoing system maintenance, ADA compliance, equity considerations, or other policy mandates apart from growth management. We know it is complex. But don’t ignore the growth management mandate which is the paramount purpose of the comprehensive plan regarding transportation.

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

As we view the ten categories, it appears that only one or two relate to the purpose of managing growth: Capacity-Major obviously, and some portion of Intersection and Traffic Safety Operations. Viewed that way, about 20%-25% of the total \$2.4 billion program relates to growth by providing capacity improvements on specified roads and intersections, and 75%-80% relates to operating and maintaining the system. With that clarification in this chapter, matching adjustments would follow to the financial analysis in Chapter 6, so as to point toward regional intergovernmental solutions for the problem of regionally caused traffic growth on county roads. Since the county has no revenues to spare, new capacity projects of a regional nature must be left undone until the region finds resources to fund them and should be clearly identified (in a separate chapter) to make the issue crystal clear.

Taking the numbers at face value, we conclude that if only \$288 million is available over 20 years, then most of the ten categories of projects will not be funded; i.e., the projects will not happen. Clearly preservation of the system takes priority over other desirable but optional projects. On that basis, we could surmise that bridge projects and vulnerable road segments should get most of the funds, but those categories alone total \$664 million, or twice the available funds. Clearly about half those needs must then be funded from other sources yet to be found, and virtually all of the other eight categories would be totally unfunded. This is indeed a dire situation. We call for a clearer demonstration of the situation by setting forth in this document an allocation of known funds to specific projects, scheduled by five year increments by Community Service Area, and show the remainder as unfunded. We spell that further in our comments on Chapter 6.

High-cost versus low-cost projects is another area of confusion. With just a casual glance through the long project list we see that a great amount of the \$2.4 billion program cost relates to a few high-cost projects that are clearly beyond the ability of the known \$288 million resources to be provided for. Perhaps the remainder of the road program would appear closer to fiscal balance if some high cost projects were placed in a separate high-profile category that must be funded separately from the County Road Tax. The most obvious examples are as follows, listed in the order found by browsing through *Exhibit A — 2024 Transportation Needs Report Project List*:

Project ID	Description	Cost (millions)
RC-10 &ff	Three Seawall replacement projects on Vashon Island	\$ 75
BR-1136B	The Woodinville-Duvall Road bridge at Duvall Slough	\$ 105
CP-12 &ff	Seven capacity projects in Bear Creek/Sammamish area	\$ 262
CP-15-1 & OP-RD-5	Two capacity projects in Bear Creek/Sammamish area	\$ 38
CP-15-2 & RC-118	Issaquah Hobart Rd two congestion relief, reconstruction projects	\$ 56
OP-RD-22 & -24, -26	May Valley Road lane widening projects	\$ 55

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

CP-15, CP-15-4, & OP-RD-25	Three capacity projects east of Renton	\$ 43
BR-3085	Covington-Sawyer Rd Bridge replacement at Jenkins Creek	\$ 17
BR-3086OX	Berrydale Bridge on Kent Black Diamond Rd, replacement	\$ 15
BR-3015	Patton Bridge on Green Valley Road, replacement	\$ 46
INT-TSO-20-10	Kent Black Diamond Rd / Auburn Black Diamond Rd Intersection	\$ 14
BR-2133A	Sikes Lake Trestle replacement in Snoqualmie Valley area	\$ 22
BR-3032	Green River Gorge Bridge replacement	\$ 32
BR-1221	North Fork Rd Bridge replacement, near North Bend	\$ 31
VRS-20-21	SE Middle Fork Road reconstruction	\$ 21
BR-509A	Baring Bridge over South Fork Skykomish River, replacement	\$ 23
BR-99W	Miller River Bridge replacement, Old Stevens Pass Hwy	\$ 36
NM-(all)	80 Active transportation projects countywide, adding roadside paths, trails, etc. alongside existing county roads	\$ 350
RC-(all)	36 reconstruction projects on major county arterials, providing both repaving benefits and minor road widening and shoulder improvements providing Active Transportation benefits. Too many to list separately.	\$ 338

The 29 individually listed high-cost projects total almost \$900 million. Bridges and capacity-major projects figure prominently in this list. In addition, the Active Transportation and Reconstruction categories consist of numerous projects that are individually costly due to their long project lengths. As a group they are collectively unfundable and it seems difficult to prioritize these projects to a smaller more fundable subset, so these are listed as total groups above. They add another \$688 million. All together, the listed projects represent about two-thirds of the \$2.4 million program cost. We would argue such projects should all be put aside for future funding by other sources. Now the remaining unfunded needs are about \$800 million versus \$288 million presumed available. We invite the county to show a priority analysis of which of the remaining project categories rank highest for completion with the available funds, and which will be deferred.

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

Finally, in our view, some of the projects included in the TNR do not make sense on initial inspection. But we don't have the details to review either. So we recommend, among other strategies going forward, that the contents of the TNR in each Community Service Area be reviewed with community representatives to explain the fiscal crisis and gain community input as to the highest priority needs. Perhaps that will help prioritize the program better, as well as help with community understanding and support for new funding strategies.

Chapter 6. Financial Analysis

pp. C1-40 thru C1-44:

Taking the TNR at its word, even without changing the scope of project needs to address additional needs we have highlighted before, the table on p. C1-42 gives an estimated cost to meet all needs of \$2.5 BILLION dollars, over 20 years, whereas the available revenues under current law are given as only \$288 million dollars, and over two-thirds of that amount is grant funds from other sources. We will trust that estimate of grant funds is somehow reasonable and not a dream. Even so, only 12% of TNR needs will be funded in 20 years. This is not just a broken system. It is a catastrophe.

The character of the rural area will not be preserved, it will not be maintained, it will be destroyed by such a shortfall which is born only by rural residents, not urban dwellers. The needs of through travelers will not be met either.

We recommend that a new chapter be added to this appendix, detailing how King County Roads will act to operate within its means, in five year increments from 2024 to 2044.

We expect to see a list of roads or road segments that will be shut down, bridges that will be closed, paved road not maintained and allowed to "return to gravel" as we have heard said in many public forums for several years. Other services will be reduced or terminated. Standards will not be met. These realities need to be put forth in plain language.

The simplest thing to do going forward is to stop using rural roads as surrogates for a deficient state highway system. Strategically disconnecting a very few county roads will push a number of through trips back onto state highways (and the four Rural Regional Arterials) where they belong. With minimal impact on rural residents.

That will shift the focus toward state funding of the growth problem so the legislature can deal with it. Three examples suffice to demonstrate this point:

(a) Four Rural Regional Arterials alone account for over \$500 million in construction costs in the TNR. Converting these roads to state highways and state funding would remove almost 20% of the TNR cost estimate.

(b) In Northeast King County, commuters out of Snohomish County have discovered a path around congestion on SR 203 in and near Duvall, by taking a different path through bucolic

JOINT RURAL AREA TEAM COMMENTS

farmlands using country roads designed only for access to farms. The route follows Tualco Road from SR 203 to the Snoqualmie River, crossing that river at what locals call the “High Bridge” and then turn southward on West Snoqualmie Valley Road to reach the Woodinville Duvall Road (a Rural Regional Arterial). This West Snoqualmie Valley Road is very antiquated and very physically deficient. It serves historically as local access for local farms – not through travel. It is at risk for slides as it follows the steeply sloping west wall of the valley. High commuter volumes are impactful to the farms along that road, and the road will need reconstruction much sooner. The TNR lists two slide-control projects on this road costing several million dollars. The rising use of this road by inter-county commuters will soon dictate total reconstruction of this road, a cost not yet found in the TNR.

Truncating the West Snoqualmie Valley Road south of the High Bridge (at the county line would be quite poetic) would bring that future problem into immediate focus to the commuters, who would be forced back onto state highways to reach their urban King County destinations. They can choose between SR203 through Duvall, and SR 522 out of Monroe. This regional-scale problem will then be impacting regional-scale facilities, not King County's antiquated rural roads. It would also preserve the road much longer for service to local residents, most of whom would be only slightly inconvenienced by the loss of access northward, and the number of farms along that section of West Snoqualmie Valley Road is actually quite small.

(c) In Southeast King County, commuters from Bonney Lake, Buckley, Enumclaw, and Black Diamond who commute north via SR 169 currently bypass Maple Valley in considerable numbers through rural Ravensdale and Hobart and continue northward into Issaquah. They take several paths to Ravensdale then head north via Landsburg Road across the Cedar River to 276th Avenue SE which turns into Issaquah Hobart Road at SR 18. Most of that traffic through rural Hobart on 276th can and should be using SR 169 instead. This was dramatically proven in August 2019 by a real-world traffic diversion event.

That is when King County Roads reconstructed the bridge decking on Landsburg Road over the Cedar River, closing that bridge for two weeks. The result was a 75% DECREASE in traffic through Hobart on 276th Avenue SE, and traffic CHAOS on SR 169 through Maple Valley which made the TV news the morning of Monday, August 12!

What if that bridge had been simply decommissioned instead of retrofitted, saving millions of dollars? The effects would have been

- Less congested access to 276th Ave SE for rural residents in Hobart,
- minimal loss of regional connection for Hobart residents, since SE 216th Street provides a suitable alternative connection to Maple Valley, and
- a longer lifecycle for maintenance of Landsburg Road and 276th Avenue SE,
- a longer lifecycle for maintenance of Ravensdale-Black Diamond Road
- a longer lifecycle for maintenance of Retreat-Kanaskat Road, Cumberland-Kanaskat Road, Veazie-Cumberland Road, and 284th Avenue SE to Enumclaw.

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

Those roads represent over 20 miles of county roads that could be preserved for rural access use for a much longer time, not to mention preserving the tranquility of abutting residences as well. Construction projects in the TNR on those road segments total \$78 million that could be avoided or greatly postponed.

The above three examples alone address almost one-fourth of the total TNR 20-year cost as it stands. Similar analysis of other routes should lead to additional savings for King County even if less dramatic.

The next thing to be done is to show concretely how King County will manage its road system on a budget of \$288 million over 20 years, with no new revenues. Show what projects will be undertaken, in 5-year increments, and show what will be consequences of not doing all the rest of the TNR's long list of needs. State what roads will be closed or reduced to gravel, what bridges will be closed, what services will not be provided. Once that information is made public, reaction by elected officials at state and regional levels is much more likely to follow.

We also recommend adding a new section on **Haul Roads**. The comprehensive plan should also discuss haul roads and the problems associated with same. Several county arterials are severely impacted by heavily loaded trucks coming from quarries, logging operations, and other resource extraction activities which are common in the rural area. The county's current methodology for determining haul road fees and assigning fees to operators through the permitting process is grossly inadequate to provide adequate compensation for the damage done to roads by heavily loaded trucks, some carrying up to 100,000 pounds gross weight. That is 10 to 20 times the weight of a passenger car. Engineers know that road damage rises versus vehicle weight in an exponential manner. But the fee methodology is based on vehicles, not weight, and thus grossly understates the damage due to heavy trucks. Truck monitoring and collection of fees is also haphazard or nonexistent in the years after the initial start of operations. A simpler, more effective system is needed. A good start would be to have an inventory of roads affected, estimate the volumes of heavy trucks involved now and in the future, and then analyze alternative tax and fee systems.

JOINT RURAL AREA TEAM COMMENTS

C2 - Regional Trail Needs Report

[Appendix C2 – Regional Trail Needs Report \(Attachment F\)](#)

We offer only improvements to an excellent *King County Regional Trails System* by listing connections most needed to make the system more accessible, safe, usable and equitable:

- Connecting the **Snoqualmie Valley Trail to Snohomish County's Centennial Trail**, a rural regional trail from Snohomish north into Skagit County, thus giving commuters and tourists an active alternative to increasingly busy north-south interstate and road corridors. King County now owns the corridor to the County Line and has cleared a portion that was built over. It will need development funds in a future Parks Levy. We recommend King County partner with Snohomish County to encourage completing the corridor through *both* Counties.
- Better connection of the **Snoqualmie Valley Trail to the statewide Palouse to Cascades Trail/Mountains to Sound Greenway**, which is part of the National Recreational Trail System. This will also provide a better Northern Route for the Cross State Trail program being developed.
- Now with restrictions on the number vehicles allowed into Mount Rainier National Park (MRNP) each day, there is a greater need for a multi-use trail to connect MRNP with King County (where most visitors to the Park originate) via the **SR-410/White River Corridor**. Such a trail would allow active transportation options for county residents and visitors to reach the SE highlands of King County and MRNP. Research is needed to determine if the Weyerhaeuser Mainline logging road that runs parallel to SR410 for most of the 17 miles between Enumclaw and the county line/Greenwater can be repurposed as a trail. Tourism is an important and growing part of the local economy of SE King County, and this will help to make that more sustainable, increase road safety, and reduce the need for investments in additional road infrastructure.
- In south King County most of the regional trails are oriented on a north/south basis. Other than the **Cedar River Trail**, there are almost no east/west regional trail connectors. From a biker's perspective, this is a serious fault in the current system and is limiting both recreational and commuting opportunities. The best and easiest way to develop a needed east/west trail connector is to put a trail alongside the existing railway (there are many examples of this being done successfully). The only rail line east/west in south King County is the Stampede Pass line. It could start near the Tacoma Watershed at the Green River Headworks Road (at the site designated for the Foothills Trail—north/south, then through Ravensdale along Ravensdale Creek, Maple Valley (crossing/connecting to the **Cedar River-to-Green River Trail**), then continuing along Jenkins Creek through Covington and on to Auburn and Kent. In the valley, this can easily be connected to both the Interurban and Green River Trails.

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

D1 - Growth Targets & the Urban Growth Area (Attachment G)

[Appendix D1 – Growth Targets and the Urban Growth Area \(Attachment G\)](#)

Theme

- Unfortunately Growth Targets cannot be enforced to keep *irresponsible* cities, such as Black Diamond, from *grossly* overgrowing *directly* impacting County roads and rural residents and *vastly* underpaying for maintenance based on their proportional usage.

Specific Comments

p. D1-10:

Figure 5: King County Jurisdiction Growth Targets 2019-2044

We understand the numbers in *Figure 5* were adopted in the 2021 CPPs—and we offered detailed written comments at the time. However, we again want to point out the coming “*train wreck*” that primarily County roads will face that will impose additional burdens on the Roads program funded primarily by Rural Area taxpayers. The City of Black Diamond, a designated “*City in the Rural Area*,” (included in the “*Cities and Towns*” rows in the figure) has been allocated a 2019-2044 Housing Target of 2,900, which its already approved Master-Planned Development (MPD) plans show it will *grossly* exceed. It also has other permit applications under consideration, that when approved, will make this even worse.

To make matters worse, the City of Black Diamond has been allocated a 2019-2044 Job Target of *only* 690 (an *anomaly* compared to the *Housing/Job Target* ratio for every other city listed!), meaning that the *vast majority* of its 20,000+ new residents will commute on County roads to their jobs in the major cities, as they avoid the much congested SR-169, which the City is barely improving, except for the addition of some left-turn lanes and two potential roundabouts. This all amounts to a recipe for disaster, especially for Rural Area residents/commuters! All other cities listed are handling their Growth Targets in a professional and civil manner, leaving Black Diamond as an *irresponsible* city, a “*poster child*,” that is knowingly overloading County roads and imposing an unfair and inequitable financial burden on the Rural Area taxpayers to mitigate the impacts its own poorly developed policies and permit approvals are creating.

The current Growth Target and Allocation system is badly flawed and, by ignoring those flaws, we perpetuate them *ad infinitum*.

B. Land Capacity in the UGA

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

1. Countywide

pp. D1-11 thru D1-12:

While the following paragraph rightly states the *Urban Growth Capacity Report* finds sufficient capacity available for *total* UGA projected growth and that some cities lack sufficient capacity for their *individual* projected growth, it does not state any concern or remedy for those cities that grossly exceed their projected growth and what “*reasonable measures*” they should take to correct such inconsistencies and the resulting burdens, primarily infrastructure, they will place on their neighbors, both urban and rural. Consequently, such inconsistencies will not be addressed by these cities in their 2024 Comprehensive Plans. We call for such cities to regularly report to the Growth Management Planning Council (GMPC) on how they are handling such inconsistencies.

“While the Urban Growth Capacity Report found that sufficient capacity was available in the UGA for projected growth, that urban densities were being achieved, and that urban King County was on track to achieve its 2006-2035 growth targets, a small number of cities lacked sufficient capacity for projected growth or were not growing at a rate to achieve their targets. The Urban Growth Capacity Report noted the cities where inconsistencies were identified and recommended that the cities evaluate whether reasonable measures were required to be taken in the 2024 periodic update to comprehensive plans to correct for the inconsistency.”

JOINT RURAL AREA TEAM COMMENTS

Land Use and Zoning Map Amendments (Attachment I)

[Land Use and Zoning Map Amendments \(Attachment I\)](#)

pp. 35-40:

Map Amendment 8: Countywide – King County Open Space System Expansion

AMENDMENT TO THE KING COUNTY COMPREHENSIVE PLAN LAND USE MAP and THE KING COUNTY ZONING ATLAS

We support the following as part of a multi-area effort by the County to clean up land ownership maps and zoning to show "open space" for many parcels acquired to date, as well as to change those parcels owned by the WA Department of Natural Resources to RA-10 zoning.

Effect:

- ...
- **Amends the zoning of parcels located south of Interstate-90, south of the City of Snoqualmie from RA-5 (Rural Area, 1 dwelling unit per 5 acres) to RA-10 (Rural Area, 1 dwelling unit per 10 acres), removes P-Suffix SV-P35 from the parcels, and repeals SV-P35 from the Zoning Atlas. SV-P35 requires lot clustering on a portion of the affected parcels and that the remainder of the parcels be dedicated for permanent open space.**

Map Amendments 9 thru 20: Vashon-Maury Island ...

Please note that one of our Joint Team organizations, the *Vashon-Maury Island Community Council (V-MCC)*, due to limitations in its By-Laws, is unable to complete its review of the ERP at this early stage. We have encouraged the V-MCC to submit its comments separately when ready and fully approved and request the County Council strongly consider them. Consequently, we have *not* included any comments here on this part of the ERP that warrant specific V-MCC comment.

We suggest consideration of adding the following **Map Amendment**:

Map Amendment XX: Countywide – P-Suffix Zoning / Development Conditions

AMENDMENT TO THE KING COUNTY ZONING ATLAS

ZONING

JOINT RURAL AREA TEAM COMMENTS

1. Remove P-Suffix zoning (EN-P01, FC-P02, SV-P37, SV-P037, SV-P11, SV-P12, SV-P13, SV-P15, SV-P17, SV-P18, SV-P19, SV-P20, SV-P21, SV-P25, SV-P26, SV-P28, TR-P09, TR-P21, TR-P22) for commercial, industrial or mining activities in the Rural Area of unincorporated King County, if the condition is not currently met and remains out of compliance for one year, then zoning reverts back to underlying/original (non-commercial) zoning. Further if the ownership changes the uses would revert to underlying zoning.

2. Repeal P-Suffix Development Conditions EN-P01, ES-P04, FC-P02, GR-P04, GR-P03, GR-P02, GR-P01, SV-P37, SV-P037, SV-P11, SV-P12, SV-P13, SV-P15, SV-P17, SV-P18, SV-P19, SV-P20, SV-P21, SV-P25, SV-P26, SV-P28, TR-P09, TR-P21, TR-P22 from Zoning Atlas.

Effect:

- ***Most of these P-Suffix development conditions are many years out of date. This would allow parcels that do not meet the commercial development conditions to revert back to underlying zoning for more clarity and transparency in zoning, provide more land for additional housing units, reduce impact of and cost to regulate commercial business in the Rural Area and restore Rural Character and help improve tourism and more sustainable economic development in the Rural Area.***

JOINT RURAL AREA TEAM COMMENTS

King County Code Amendments

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

Summary of Proposed Ordinance (King County Code amendments)

[Summary of Proposed Ordinance \(King County Code amendments\)](#) [Proposed Ordinance \(King County Code amendments\)](#)

Theme

- Changes to Code are needed, e.g., Special-Use Permits (SUPs), Temporary-Use Permits (TUPs), Conditional-Use Permits (CUPs), etc., must be focussed and limited; while permit exceptions should be just that—exceptions for a very specific purpose meeting very specific, temporary, and non-recurring situations or conditions, not the rule.

Overall Comments

Although not Code specific, implementation continues to mar good Policy and Code. For example, the use of exception-based criteria to allow for a permit applicant's desire to circumvent the overall mandates of the KCCP needs to be severely curtailed (e.g., Special-Use Permits (SUPs), Temporary-Use Permits (TUPs), Conditional-Use Permits (CUPs), etc.). Historically, after an application has been found "*complete*," the applicant has asked for and been granted exceptions to some of the parameters of the KCCP or KC Code. Exceptions should be just that—exceptions for a very specific purpose meeting very specific, temporary, and NON-recurring situations or conditions, not the rule. Additionally, upon granting of any exceptions that have become too routine, there has been little to no monitoring to ensure the conditions granted are enforced.

Specific Comments

In the following pages we provide comments on specific **Code Amendments** found in: [Summary of Proposed Ordinance \(King County Code amendments\)](#), with actual **Code Language** found in: [Proposed Ordinance \(King County Code amendments\)](#).

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

KC Code 21A.04.090 pp. 25 thru 26, Section 54

Current Code—Establishes the purposes of the Neighborhood Business (NB) zone, including: Allowing for mixed-use developments and Allowing NB zoning in areas designated as urban neighborhood business centers, rural towns, or rural neighborhood centers.

Proposed change—Limits mixed use development to the urban area and rural towns. Allows NB zoning in areas designated as UACs, community business centers, neighborhood business centers commercial outside of centers, rural towns, and rural neighborhood commercial centers.

Comments—We originally submitted this concern. We like the proposed changes, as we want to ensure that KC Code going forward no longer allows *NEW* Mixed-Use at the existing sites listed in the ERP (pp. 3-34 to 3-35). We understand some of these sites have had Mixed-Use for decades—we have absolutely no problem with those. We are concerned with sites that simply have a General Store / Gas Station, etc. and do not want to see Mixed-Use added, as it completely defeats the whole purpose of Rural Area Neighborhood Business Districts as defined in the ERP (p. 3-34):

"The Rural Neighborhood Commercial Center land use designation is used to recognize existing small pockets of commercial development, or in some cases, historic communities or buildings, that are too small to provide more than convenience shopping and services to surrounding residents. They generally do not have infrastructure or services such as water supply or sewage disposal systems any different from those serving the surrounding area."

Yes, we know some of the older such areas, like Preston, etc., are pretty large and probably were that way before the State passed the Growth Management Act (GMA) ~30 years ago.

Our research here has shown us that nearly all these Rural Area NB Districts have been in existence for a long, long time and, basically / typically have no Mixed-Use, with the exception of all those on Vashon. This strengthens our push to not allow *NEW* Mixed-Use in KC Code for Rural Area NB Districts going forward. That said, we are concerned some might seek to keep Mixed-Use here, while possibly reducing the density. We do not believe that makes sense, as Mixed-Use has no place in the Rural Area and, even if it did, low densities would render such Mixed-Use, more or less, impractical.

The other problem is that it appears King County has tried to shoehorn every one of these nearly 30 locations into *one category*: Rural Area NB Districts. However, there are vast differences within that one category not recognized in the Code. For example, some:

1. Border on the UGB (or are very nearby) and, thus, serve mainly Urban folks.
2. Consist of a Gas Station, a General Store, or a Restaurant.
3. Are very isolated, thus serving rural neighbors (or hikers, etc.) exclusively.
4. Were the original Town prior to incorporation, but were excluded.

As part of our research, we used the following list found in the ERP (p. 3-34):

JOINT RURAL AREA TEAM COMMENTS

***Rural Area—Neighborhood Business Districts
(listed by Community Service Areas)***

Bear Creek/Sammamish

Cottage Lake (no. end of Avondale Rd)—**NO MIXED USE**
Redmond-Fall City Rd/236th Ave NE—**NO MIXED USE**

Four Creeks/Tiger Mountain

Issaquah-Hobart Rd/SE Tiger Mountain Rd—**MIXED USE UNDER CONSTRUCTION**
SE Renton- Issaquah Rd and 164th Ave SE—**MULTIPLE BUSINESSES (PLUS A HOME)**
SE 128th Street/164th Ave SE—**MULTIPLE BUSINESSES**

Greater Maple Valley/Cedar River

Renton-Maple Valley Rd SE/State Route 18—**NO MIXED USE**
Ravensdale—**MULTIPLE SMALL BUSINESSES—NO MIXED USE**
Hobart—**SINGLE STORE & POST OFFICE—NO MIXED USE**
Kangley—**SINGLE PARCEL, LOOKS TO BE A RESIDENCE**
Kanasket—**TWO PARCELS, LOOK LIKE TWO HOME-BASED BUSINESSES**

Snoqualmie Valley/Northeast King County

Preston—**LARGE BUSINESS COMPLEX—NO MIXED USE**
Timberlane Village—**MORE OF A "DESTINATION RESORT," RATHER THAN A NB**
Baring—**COUNTRY STORE—NO MIXED USE**

Southeast King County

Enum-BD Rd SE/SE GV Rd—**TWO PARCELS (ONE OWNER?), NURSERY (PLUS A HOME)**
Cumberland—**MIXED-USE—MULTIPLE SMALL BUSINESSES WITH HOUSING ABOVE**
Krain's Corner—**RESTAURANT—DWELLING ABOVE**
Newaukem—(If this is SR 169 / SE 416th St) **STOP & SHOP—NO MIXED USE**
228th Ave SE/SR-164—**HOMES, BUT BUSINESSES ON SW CORNER ON A-35 LAND**

Vashon-Maury Island

ALL THE FOLLOWING LOCATIONS HAVE HAD MIXED USE FOR QUITE SOME TIME

Burton
Dockton
Tahlequah
Portage
Heights Dock

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

Jack's Corner
Valley Center
Vashon Service Center
Vashon Heights
Maury Island Service Center

In these we did find some dwelling(s), but usually they were simply private homes. Again, other than on Vashon, which has unique circumstances, there were no Mixed-Uses consisting of businesses combined with apartments, townhouses, condos, etc.—with one glaring exception: Issaquah-Hobart Rd/SE Tiger Mountain Rd NB District where new mixed-use buildings are under construction and was the genesis of our original concern in 2017.

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

KC Code 21A.06.196

p. 31, Section 71

Current Code—Defines “*clustering*” ... Clustering: development of a subdivision at the existing zoned density that reduces the size of individual lots and creates natural open space for the preservation of critical areas, parks and permanent open space or as a reserve for future development.

Proposed change—Replaces using clustering for preservation of “*parks and permanent open space*” with “*resource land for forestry or agriculture.*”

Comments—We are concerned with this change in clarification. The long-term focus should be more on parks and permanent open space to preserve the rapidly decreasing habitat and habitat corridors in KC. Yes, forestry and agriculture are good and useful, but are managed to make money for the landowners, vs. parks and open space that our collective community assets that better support wildlife habitat and natural ecosystems, which also have major benefits to the community and can also generate substantial rural economic activity, but in a more collective way, vs. benefiting only a few – in this way it is an *equity* issue.

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

KC Code 21A.06.XXX

p. 37, Section 90

and

KC Code 21A.08.040

Recreational and cultural land uses.

p. 43, Section 103

Proposed change—Adds a new section to KC Code 21A.06 to define "*outdoor resource-based recreation activities*."

Intent/rationale—To support new destination resort regulations proposed in K.C.C. 21A.08.040.

Comments—We agree such resorts should not be allowed in RB and UR zones and should be resource-based, *but* we are unsure what "*resource-based*" means in this particular context ???

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

KC Code 21A.06.XXX

p. 38, Section 91 and Section 92

Proposed changes—Adds a new section to KC Code 21A.06 to define "*permanent supportive housing*." Adds a new section to K.C.C. Chapter 21A.06 to define "*recuperative housing*."

Comments—The "*permanent supportive housing*" subcategory of "*emergency housing*" needs better definition, so that it does not allow mobile homes or Recreational Vehicle camps in the Rural Area – which *already* are a big problem. "*(R)ecuperative housing*" also needs to be better defined, as many in the Rural Area have complained about a site on the Enumclaw Plateau permitted for rehabilitation of sex offenders.

2024 KCCP Major Update Executive’s Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

KC Code 21A.08.030—Residential Land Uses
p. 40, Section 102

We offer the following changes:

Existing Code	Proposed Revised Code	Rationale
<p>21A.08.030—Residential land uses. Condition P9. Only as accessory to the permanent residence of the operator, and:</p> <ul style="list-style-type: none"> a. Serving meals shall be limited to paying guests; and b. The number of persons accommodated per night shall not exceed five, except that a structure that satisfies the standards of the International Building Code as adopted by King County for R-1 occupancies may accommodate up to ten persons per night. 	<p>21A.08.030—Residential land uses. Condition P9. Only as accessory to the permanent primary residence of the business owner and operator, and:</p> <ul style="list-style-type: none"> a. Serving meals shall be limited to paying guests; and b. The number of persons accommodated per night shall not exceed five, except that a structure that satisfies the standards of the International Building Code as adopted by King County for R-1 occupancies may accommodate up to ten persons per night. 	<p>Bed & Breakfasts (B&B's) are permitted in the RA zone under condition P9. This change is proposed under the same rationale we provided in our proposed changes to KC Code Title 21A.30.085 and 21A.30.090 Home occupations and Home Industry. We are seeing an increasing trend where people set up businesses at sites where they do not live. In some cases, we see where residential use is abandoned altogether. The code's intent is to allow for people to operate businesses at their place of residence, with limitations to achieve compatibility with Rural Area zoning. Owner residency is intended to be a <i>precondition</i> for such uses in these zones. This is because people usually treat their property and neighbors differently (better) when they actually live at the site. Plus, Rural Area roads are being turned into <i>de facto</i> strip mall corridors, as businesses set up in what used to be residences because it's cheaper than being inside the UGA. This proposed change will ensure that permitted commercial uses remain secondary to the site's primary use as a residence by the business' owner/operator.</p>

KC Code 21A.08.030—Residential Land Uses (Duplexes, Triplexes, and Fourplexes)
pp. 40-43, Section 102

Proposed changes—*“Limits mixed-use developments ... in the rural area on historically designated sites.”*

Comments—We do not understand why Duplexes, Triplexes, and Fourplexes would be allowed *“in the rural area on historically designated sites.”* We also wonder how many National Register of Historic Places actually exist in the RA zone that would possibly qualify for such buildings.

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

KC Code 21A.08.040
pp. 43-44, Section 103

Proposed change—Adds new conditions for destination resorts. Removes allowance for designation resorts in UR and RB zones.

Comments—We support *new Development Condition 30*; however, we request the addition of *subparagraph i.*, which was included in the Public Review Draft:

"i. A destination resort application must demonstrate that public facilities are adequate to support the proposed use in accordance with K.C.C. chapter 21A.28."

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

KC Code 21A.08.080
pp. 46-48, Section 107

Proposed change—Removes condition use permit requirements for wood products.

Intent/Rationale—Streamlines permitting process for wood products to align with existing Comprehensive Plan support in policy **R-627** to *"ensure that regulations applying to Rural Area and forest areas do not discourage the establishment of sawmills and other wood product businesses and services."*

Comments—To remove conditional-use permits for wood products is wrong and would allow stump grinding and stockpiling activities, such as had been proposed by Enumclaw Recycling Center (located on Franklin Rd north of the City of Enumclaw, just south of the Green River Gorge), and now by same owners site in Ocoola that is now partially permitted because they say they produce a mix of coarse chips of bark and wood that is called "hog fuel." It would also tend to allow facilities such as Buckley Recycling Center (located in the Rural/Agricultural area just north of the City of Auburn), which, due to well over a decade of litigation between it and King County, the county is well aware of the environmental and other adverse issues of allowing large scale stump grinding, wood waste processing, and stockpiling in agriculturally zoned lands.

Proposed change—Adds new conditions for materials processing use.

Intent/Rationale—Changes to the conditions for materials processing use are proposed in response to a docket request. Materials processing uses, which can include both organic and mineral processing, often source materials from resource and rural areas. Generally, it is, and can be, beneficial, both economically and environmentally, for these types of facilities to be in the rural area when properly regulated and mitigated. By locating closer to the resources, these uses can avoid unneeded increased transportation costs and related emissions impacts by reducing the number of truck and vehicle trips and miles travelled. So, no changes are proposed to limit the locations of these sites. However, various changes are proposed to impose additional regulations for materials processing uses, such as disallowing retail sales of the materials on the site; as an accessory to a mineral use, only allow processing of onsite and/or nearby (within 3 miles of the site) materials; and additional requirements for sites in the rural area, including storage limitations (up to 3,000 cubic yards), ensuring code compliance requirements (landscaping, nonresidential land use standards, and grading permits), and requiring materials to primarily be from rural and resource lands to ensure it is a rural-dependent use.

Comments—As stated in the "Intent/Rationale" above, this was in response to our Docket Request (2022, #8), but the proposed changes do not go far enough. Material processing needs to be better defined, and limited to Agricultural-zoned, and not Forest-zoned areas. There are really no by-product materials from forest lands that need to be processed, aside from the lumber itself. The by-products are from the industrial lumber mill and not the harvesting activities. Agricultural-zoned areas are

JOINT RURAL AREA TEAM COMMENTS

different, where there are by products taken offsite from farms. Consequently, we suggest the processing of agricultural materials stay close to the source and remain on agricultural-zoned land and be limited to scale to agricultural needs and use consistent with the character of the surrounding land use – as the valid operations would propose. Allowing material processing in Forest-zoned areas will lead to improper land use, code violations, environmental damage and increased fire risk for the forest and people living there.

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

KC Code 21A.22.060 p. 61, Section 135

Proposed change—Limits uses, buildings, structures, storage of equipment, and stockpile of materials to only those directly related to an approved mineral extraction use, reclamation plan, or materials processing use.

Comments—This was in response to *our* Docket Request (2022, #9), but the proposed changes do not even go as far as those proposed in the Public Review Draft for the following Development Condition:

B. On sites larger than twenty acres, activities shall occur in phases to minimize environmental impacts. The size of each phase shall be determined during the review process in accordance with the following:

- 1. On sites one hundred acres or less, each phase shall not be more than twenty-five acres; and*
- 2. On sites more than one hundred acres, each phase shall not be more than fifty acres. Phases that include areas of greater than twenty-five acres shall have setbacks double those specified in subsections E and F of this section.*
- 3. A third phase shall not be initiated until reclamation of the first phase is substantially complete. No more than two phases shall be allowed to operate at a time without previous phases having been reclaimed.*
- 4. Minor variation from these standards may be requested and approved as part of the permit review process where it is demonstrated to be needed or beneficial for compliant operation of the mineral extraction based on regulations for protection of water quality, environmental conditions or safety;*

We call for items 1. thru 4. to be added to **KC Code 21A.22.060** Site design standards. B. and the following be added as item 5.:

- 5. Any significant revision of the mining plan or schedule, or ownership, will require the operation to reapply for a permit to conduct mining on the site, including the opening of a Public Comment period. If the revised permit to conduct mining is denied, then the operation must begin reclamation-only activities within one year of such determination.*

The original purpose for our 2022 Docket Item was to prevent the typical practice of delaying reclamation by updating mine plans/expansions, and then delaying long enough either to go bankrupt or limit liability by selling site/business to “another” party. A good complement to the above proposed Code changes is to include a statement that major changes in the Reclamation Plan (or Schedule) will require a new application to conduct mining (with accompanying public comment, etc.). The presumption is that such a new application is an opportunity to fully review mining on a site like it was a new mine proposal. In fact, **KC Code 21A.22.050** Periodic review. should apply to reclamation, not just permitted extraction activities.

JOINT RURAL AREA TEAM COMMENTS

To be clear, we need stronger protections around this area of mine reclamation/disposal. Currently, under existing Code and how it is interpreted in practice, we are living with the harmful practice of using mining sites, especially former or abandoned mining sites, effectively as waste-disposal facilities where, unfortunately, the standards that are supposed to provide a safeguard are routinely ignored by both the permitting agency and the site owner/operator. This appears to mainly be the case to maximize profits to the site owner/operator. Compounding all of this, is the lack of Periodic Review per Code (also a focus of our 2022 Docket Item), as KC DLS-Permitting simply doesn't have the person-power to do it, as related to us by Jim Chan on 10/26/21: *"We have had significant staff turnover tied to this body of work and are working on a plan to back into alignment with new staff."*

As a result, we see the need for more opportunities for Public Comment and Review, especially when there is a proposed change of activity and/or ownership. We have seen too many times when either has precipitated unanticipated problems and the Public is the last to know, but is the most affected. Although the existing KC Code 21A.22.060 Site design standards language could be regarded as already containing this requirement, as generally public comment is "required" as part of the permitting process, the requirement isn't explicit. We already know from the debacle around the Reserve Silica in Ravensdale (note: from the start of 2023 we have an ongoing dialogue with KC DLS-Permitting's Deputy Director, Mark Rowe, and Code Enforcement Manager, Thomas Campbell, on this particular site and operation) matter that such changes to permits for these types of properties and situations are done without any public notice, involvement or input. We believe such language is the minimum necessary to address such questionable activities by mine property owners and Permitting.

King County can never allow the environmental debacle and legal quagmire that occurred this in mid 2023 at the Reserve Silica site in Ravensdale to happen again! Forty acres were illegally clearcut, then 33 truckloads of contaminated fill from the Tacoma ASARCO Superfund site were illegally dumped on the clearcut land and illegally graded. We alerted King County DLS-Permitting about the clearcut and provided photographic evidence—we were ignored! The Federal EPA and the State DOE alerted King County of the dumping of the contaminated fill—extremely embarrassing! As King County does little inspection and little code enforcement, none of this should be a surprise.

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

KC Code 21A.30.085
p. 72, Section 165

Current Code—Establishes requirements for home occupations in Agricultural (A), Forest (F), and RA zones.

Proposed Change—Removes allowance for nonresident employees who report to the site but primarily provide services off-site.

Intent/Rationale—Change to employee standards is proposed as the current provision is not enforceable.

Comments—If this means having such employees is *not* allowed, we support this; but if it allows home occupations to have such employees, we do not. A construction company and associated equipment should *not* be part of a valid home occupation activity.

We support this change, yet it is just one of several important changes we propose for the **21A.30.085 Home Occupation** and **21A.30.090 Home Industry** codes. These codes were significantly loosened circa 2008 and, combined with liberal interpretations of imprecise code language by the Department of Local Services—Permitting Division, have had predictable effects of increasing the scale and infringement of these activities on surrounding neighborhoods.

The following proposed changes (in tables on the next three pages) are intended to put the “*Home*” back in **Home Occupations**. The primary use for such properties should be residential in RA zones and residential/agricultural in the A zones. These changes will allow for residents to operate neighborhood-compatible businesses in their houses and on properties that are their actual places of residence. This is in response to the increasing trend of business owners buying or leasing residential properties in the Rural Areas in which they do *not* reside, but with the sole intent of running businesses there, subordinating residential use or abandoning it altogether. If these proposed changes are adopted, they will provide an enforceable limits on such businesses.

2024 KCCP Major Update Executive’s Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

Existing Code	Proposed Revised Code	Rationale
<p>21A.30.085 Home occupations in the A, F and RA zones. In the A, F and RA zones, residents of a dwelling unit may conduct one or more home occupations as accessory activities, under the following provisions:</p>	<p>21A.30.085 Home occupations in the A, F and RA zones. In the A, F and RA zones, residents of a dwelling unit may conduct one or more home occupations as accessory activities, under the following provisions:</p>	
	<p><u>A. The dwelling unit is the primary residence of the owner and operator of the home occupation business.</u></p>	<p>NEW. This clause is designed to put the "Home" back in Home Occupation activities. There are numerous cases of an entity buying or leasing a residential property and using it to site a commercial business, at which the owner/operator does not live. Sometimes the house is rented to an employee to satisfy existing code. In some these cases, this appears to be an arrangement on paper only to satisfy the "residents" clause. Standards would need to be identified for what proof of residency is required to meet this condition.</p>
<p>A. The total floor area of the dwelling unit devoted to all home occupations shall not exceed twenty percent of the dwelling unit.</p>	<p><u>AB.</u> The total floor area of the dwelling unit devoted to all home occupations shall not exceed twenty percent of the dwelling unit. <u>Attached garages are not considered part of the dwelling unit ground floor area for purposes of the provisions for home occupations.</u></p>	<p>SOME NEW. This clarifies what portion of a house may be used for the calculation of total floor area.</p>
	<p><u>C. In addition to the provisions in 21A.30.085 B., one garage or outbuilding can be used for activities associated with the home occupation(s). The floor area of the garage or outbuilding used for all home occupation activities shall not exceed fifty percent of the ground floor area of the dwelling unit.</u></p>	<p>NEW. In addition to what is allowed inside the dwelling unit, this clause allows for "activities" to be conducted in a garage or detached structure. It ties the scale of activities to the size of the dwelling unit to keep activities in scale with the developed property.</p>
<p>B. Areas within garages and storage buildings shall not be considered part of the dwelling unit and may be used for activities associated with the home occupation;</p>	<p><u>BD.</u> Additional areas within garages and storage buildings shall not be considered part of the dwelling unit and may be used for <u>storage of goods</u> associated with the home occupation. <u>Areas used for storage shall not exceed fifty percent of the ground floor area of the dwelling unit.</u></p>	<p>SOME NEW. This clause allows for additional space to be used for storage of goods. It ties the scale of activities to the size of the dwelling unit to keep storage area in scale with the developed property.</p>
	<p><u>E. Services to patrons shall be by appointment only or provided off-site.</u></p>	<p>NEW. This was taken directly from pre-existing code. It was removed in the 2000's along with other changes which we warned would result in negative unintended consequences, as indeed they did. This provision should be added back in to avoid allowing drive-up retail sales businesses to pop up in residential neighborhoods.</p>

2024 KCCP Major Update Executive’s Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

Existing Code	Proposed Revised Code	Rationale
<p>C. Total outdoor area of all home occupations shall be permitted as follows:</p> <ol style="list-style-type: none"> 1. For any lot less than one acre: Four hundred forty square feet; and 2. For lots one acre or greater: One percent of the area of the lot, up to a maximum of five thousand square feet. 	<p>C.F. Total outdoor area of all home occupations shall be permitted as follows:</p> <ol style="list-style-type: none"> 1. For any lot less than one acre: Four hundred forty square feet; and 2. For lots one acre to five acres, one percent of the area of the lot, up to a maximum of two thousand square feet; and 3. For lots five acres or greater: One percent of the area of the lot, up to a maximum of five thousand square feet. 	<p>SOME NEW. Lots under 5 acres tend to be located in neighborhoods which are more residential in character. This provision will reduce the visual intrusion on neighbors and works in harmony with subsection O.</p>
<p>E. A home occupation or occupations is not limited in the number of employees that remain off-site. Regardless of the number of home occupations, the number of nonresident employees is limited to no more than three who work on-site at the same time and no more than three who report to the site but primarily provide services off-site;</p>	<p>E.H. A home occupation or occupations is not limited in the number of employees that remain off-site. Regardless of the number of home occupations, the number of nonresident employees is limited to no more than three two who work on-site at the same time and no more than three who report to the site but primarily provide services off-site;</p>	<p>SOME NEW. The number of employees has a direct effect on the scale and intrusiveness of a business activity. It is very difficult to monitor the number of employees in any case, but even more so with such fuzzy distinctions as to who works primarily on-site, who’s there on what day, etc. Reducing the number and simplifying the distinctions will improve accountability.</p>
<p>L. The home occupation or occupations may use or store vehicles, as follows:</p> <ol style="list-style-type: none"> 1. The total number of vehicles for all home occupations shall be: <ol style="list-style-type: none"> a. for any lot five acres or less: two; b. for lots greater than five acres: three; and c. for lots greater than ten acres: four; 2. The vehicles are not stored within any required setback areas of the lot or on adjacent streets; and 3. The parking area for the vehicles shall not be considered part of the outdoor storage area provided for in subsection C. of this section. (Ord. 19030 § 22, 2019: Ord. 17710 § 11, 2013: Ord. 17539 § 61, 2013: Ord. 17191 § 48, 2011: Ord. 16323 § 2, 2008: Ord. 15606 § 20, 2006). 	<p>L.O. The home occupation or occupations may use or store vehicles, as follows:</p> <ol style="list-style-type: none"> 1. The total number of vehicles for all home occupations shall be: <ol style="list-style-type: none"> a. for any lot five acres or less: two; b. for lots greater than five acres: three; and c. for lots greater than ten acres: four; 2. The vehicles are not stored within any required setback areas of the lot or on adjacent streets; and 3. The parking area for the storage of vehicles shall not be considered part of the outdoor storage area provided for in subsection C. of this section. (Ord. 19030 § 22, 2019: Ord. 17710 § 11, 2013: Ord. 17539 § 61, 2013: Ord. 17191 § 48, 2011: Ord. 16323 § 2, 2008: Ord. 15606 § 20, 2006). 	<p>SOME NEW. Storage of vehicles can be the most visually intrusive elements of a business. As the use of outdoor spaces is permitted for “activities and storage,” vehicle storage is often the most impactful outdoor evidence of a business. This works in harmony with subsection F.</p>

2024 KCCP Major Update Executive’s Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

Existing Code	Proposed Revised Code	Rationale
<p>21A.30.090 Home industry. A resident may establish a home industry as an accessory activity, as follows:</p>	<p>21A.30.090 Home industry. A resident may establish a home industry as an accessory activity, as follows:</p>	
<p>A. The site area is one acre or greater;</p>	<p>A. The site area is one acre or greater;</p>	<p>No change.</p>
	<p><u>B. The dwelling unit is the primary residence of the owner and operator of the home occupation business.</u></p>	<p>NEW. This clause is designed to put the "Home" back in Home Industry activities. There are numerous cases of an entity buying or leasing a residential property and using it to site a commercial business, at which the owner/operator does not live. Sometimes the house is rented to an employee to satisfy existing code. In some these cases, this appears to be an arrangement on paper only to satisfy the "residents" clause. Standards would need to be identified for what proof of residency is required to meet this condition.</p>
<p>B. thru K.</p>	<p>Simply re-letter to C. thru L.</p>	

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

KC Code 21A.32.100
p. 73, Section 167

Current Code—Establishes when a TUP is required, including for uses not otherwise permitted in the zone and that can be made compatible for a period of up to 60 days per year.

Proposed change—Replaces 60 days with 24 days.

Comments—Please see our Comments under KC Code 21A.32.129 immediately following this subsection. Also, we believe that wineries, breweries, distilleries should be *excluded* from TUPs.

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

KC Code 21A.32.120
pp. 73 - 75, Section 169

Current Code—Establishes standards for temporary uses, including: Limiting events to no more than 60 days per 365-day period and Allowing for annual renewals of TUPs for 5 consecutive years.

Proposed Changes: Changes 60 days to 24 days. Limits uses to no more than 4 days per month and no more than 3 days per week; Limits uses to only occur six months out of the year; and Annual TUP renewals are reduced to up to 4 years, and requires the use to demonstrate compliance with current development regulations with each renewal.

Intent/Rationale: ... Changes for the number uses allowed per month and per week are intended to limit grouping of multiple events in short amount of time, such as having a use that occurs non-stop over the course of 24 consecutive days. This change would help limit intensity of events and associated impacts. Changes on number months per year that uses are allowed in is to limit, for example, an event that happens at the same time each month, every month of the year, for 5 years (as allowed for annual TUP renewals elsewhere in the chapter), which is more akin to a permanent use than a temporary one. Changes to renewal requirements are intended to increase oversight, to ensure impacts are appropriately accounted for, and ensure any applicable new regulatory requirements adopted after initial TUP approval are met.

Comments—Although these changes are welcome, please note, that in the Public Review Draft, we proposed changes that would place “Events” in a separate category such that places with a few events per year would be allowed and those essentially run “Event Centers” in the RA and A zones as a business under a Temporary-Use Permit (TUP) would be disallowed. Currently, TUPs allow “*up to sixty days a year*” (e.g., ~7 months of Saturdays and Sundays, which clearly is not “temporary.” The proposed changes above reduce that limit to no more than *twenty-four days a year (6 mo x 4 da/mo)*. While this proposed change is a step, in the right direction, we still firmly believe that “temporary” should be no more than “*ten days a year*” (e.g., 5 Summer weekends).

“Businesses” that hold events, such as weddings and family or group reunions, should not be granted a TUP, but rather should fall under **Title 21A.06.958 Recreation, active, as large-scale gatherings or social events**. In addition, **Title 21A.08.040 Recreational/cultural land uses** already allows certain activities in the Rural Area either outright or with a Conditional Use Permit (CUP). A CUP must be consistent with the King County Comprehensive Plan (KCCP) rules for the Rural Area and **Title 21A.44.040** criteria. Should CUPs be sought, then there should be *real* conditions imposed and enforced.

To be frank, Event Centers do *not* belong in the Rural Area. Granting TUPs for Event Centers in the Rural Area allows *special-interest commercialization* of the Rural Area. State and County laws that protect rural and resource lands must be upheld. County actions should be consistent with its own Code, Policies, and practice and protect rural and resource lands from illegal, special-interest, and unnecessary *urban-use commercial development*. Allowing Event Centers in the Rural Area essentially grants special privileges to the few, at the expense of the many: farm businesses, rural

JOINT RURAL AREA TEAM COMMENTS

residents, the environment, and taxpayers. Such urban-serving businesses belong in the UGA, not the Rural Area.

Once again, while the proposed changes are welcome, they do not go far enough and will prove useless unless they are vigorously enforced, which would require changes at the DLS-Permitting Division.

JOINT RURAL AREA TEAM COMMENTS

KC Code 21A.32.XXX
p. 75, Section 170

Proposed Changes—Adds a new section to K.C.C. Chapter 21A.32 requiring temporary uses to: Be scaled based upon building occupancies, site area, access, and environmental considerations; Be limited to no more than 250 guests; Comply with building setback requirements; and Adequately provide for temporary sanitary facilities; potable water; vehicle parking, access, and traffic control; accessibility for persons with disabilities, and noise compliance.

Comments—In general, we support these changes, *but not the “limited to no more than 250 guests,”* which is far too high and translates to possibly 125 to 175 vehicles for an event, which would create big parking and traffic impacts. Also, for these changes to have any practical impact on the ground, they must be vigorously enforced, which would require changes at the DLS-Permitting Division.

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

KC Code 16.82.150 thru 152, 154
pp. 102-103, SECTIONS 222.A thru E

Current Code—

- KC Code 16.82.150:** B—Establishes clearing standards for individual lots in the rural zone
KC Code 16.82.151: C—Addressing relocation of undeveloped area in adjacent lots
KC Code 16.82.152: D—Establishes clearing standards for subdivisions and short-subdivisions in the rural residential zone
KC Code 16.82.154: E—Addresses modification of clearing limits through farm management and rural stewardship plans

Proposed Changes—Repealed.

Intent/Rationale—Reflects court rulings and current case law, as directed by 2016 Comprehensive Plan Work Plan Action 5.

Comments—We have several concerns here:

1. What will replace the proposed *repealed* Code sections that deal with *clearing standards and limits*? We were told by the Executive's Office that these haven't been enforced since 2008 and that the guidance available in assorted Manuals suffice. We disagree, as guidance in Manuals is not considered code. Without specific Code, there is nothing to enforce. This simply will feed into the continuing problems King County has with enforcement, as identified by the recent KCAO Audit, which barely scratched the surface of the problem.

2. The lack of code enforcement in this regard is just one example of a larger problem we have observed in the culture of the DLS Permitting Division. The fact that it has not been doing its job to apply and enforce our zoning and development codes these past years is not an acceptable justification for continued negligence, nor for removing standards altogether. Applied across our zoning and development codes, we would be left with a free-for-all which would not bode well for protecting our resources, properties and communities from irresponsible development.

3. Code and accompanying regulations spell out what has to be done, and provide the basis for enforcement by the County. However, the County typically wouldn't take an enforcement action for someone not complying with a particular manual. Rather it would take an enforcement action against a violator for either taking an action without a required permit, or violating the permit, including by not carrying out actions or practices as specified in the relevant manual.

4. There still needs to be an underlying Code at the County level that authorizes County actions. So, for example, while the Stormwater Manual may be robust, it only lives through a related permit, where the permit must be written and enforced by an assigned agency—there has to be related authority in code that identifies the Stormwater Manual as the *governing authority* and spells out related procedures.

JOINT RURAL AREA TEAM COMMENTS

Area Zoning and Land Use Studies

JOINT RURAL AREA TEAM COMMENTS

Black Diamond Fire Station

[Black Diamond Fire Station](#)

We fully support the following **Conclusion** and **Recommendation**.

pp. 12-13:

III. Conclusion and Recommendation

A. Conclusion

The site does not meet the requirements to allow extension of sewer service to the rural area or for addition to the Urban Growth Area. The current septic system, and the ability to build a new system if needed, meets both current and future plans for operation of the fire station.

B. Recommendation

No changes are recommended.

JOINT RURAL AREA TEAM COMMENTS

Carnation Urban Growth Area Exchange
[Carnation Urban Growth Area Exchange](#)

Although it is stated on p. 16 that “No public comments were received on this item,” we submitted substantial comments in July 2023 in response to the Public Review Draft. We include those comments below:

Specific Comments

We understand this is a difficult issue. On the one hand the City of Carnation apparently does not support removing the site from its UGA or preserving it from urban uses without having land added to its UGA as a replacement. Such a “swap” would constitute a *UGA Exchange*.

However, we see no reason to create a *UGA Exchange* here, as the County already has robust, time-tested programs in place to handle such issues: *Four-to-One* and *Transfer of Development Rights (TDRs)*. For example, a TDR program could be explored within the City, where TDRs on the property in question could make something else within Carnation denser. This would appear to be a better solution than a *UGA Exchange*, where all proposed properties would have constraints. We support a solution that saves the agricultural use, but does not hurt the integrity of the adjacent Rural Area.

We would like to see this land protected and added to Tolt MacDonald Park that surrounds it on two sides and believe local citizens and the County want this as well, as it makes great sense. However, the idea of a *UGA Exchange* would need to be looked at carefully, as the devil would be in the details and it would need to be very limited as to where and how it might be used. In general, we do not support the concept of *UGA Exchanges* and are concerned about setting a precedent that could harm the integrity of the UGA elsewhere in the County.

Consequently, we support the following **Conclusion** and **Recommendation**:

p. 16:

III. Conclusion and Recommendation

A. Conclusion

The City has indicated that it does not support removing the site from the UGA or otherwise preserving it from urban development without replacement land being added to its UGA. Such a change would be dependent on whether the GMPC recommends creating a UGA exchange program as noted above. However, the proposal does not meet the criteria for an UGA exchange under the state law. Should the CPPs be changed to allow for use of such an exchange program in King County, the proposal would not be eligible.

B. Recommendation

No changes are recommended.

JOINT RURAL AREA TEAM COMMENTS

Kent Pet Cemetery
[Kent Pet Cemetery](#)

No comments.

JOINT RURAL AREA TEAM COMMENTS

Maple Valley Industrial
[Maple Valley Industrial](#)

We support the following **Conclusion** and **Recommendation**:

p. 17:

IV. Conclusion and Recommendation

The development conditions restricting uses to those that do not require a Conditional Use Permit limit the types of uses that would likely conflict with the surrounding Rural Area. This condition is the same as the rural industry standards contained in the code. The condition concerning a "master drainage plan" is also redundant to current code provisions. The combination of these conditions treats this site as if it is in the Rural Area, which is appropriate given its location and surrounding environment.

The City of Maple Valley does not have plans to annex this site and it is not represented in their Comprehensive Plan for growth. Further, the site currently lacks urban services and infrastructure adequate for an urban industrial site, has environmental constraints, and is surrounded on three sides by rural residential properties. It also abuts an agricultural parcel, (use and zoning A-10) which may create further incompatibilities.

No progress has been made in over 20 years to urbanize it, improve infrastructure, or make it suitable for urban or industrial development.

This site's lack of infrastructure, critical areas designations, proximity to rural residential development, a regional recreation trail corridor and the Cedar River habitat, strongly suggest a Rural Area designation and zoning is appropriate.

Recommendation

This study recommends the following for parcels 1622069091, 1522069034, and 1522069036:

- *removal from the UGA;*
- *change the land use designation from "i" (Industrial) to "ra" (Rural Area);*
- *change the zoning classification from I (industrial) to RA-5 (Rural Area, one home per five acres); and*
- *removal of TR-P17 from the site and repeal from the zoning atlas.*

JOINT RURAL AREA TEAM COMMENTS

Snoqualmie Interchange Area Zoning and Land Use Study
[Snoqualmie Interchange](#)

We have followed this issue for many years including fully participating in the Growth Management Planning Council's recent "4:1 Program Review."

p. 1

We propose the following **addition**:

I. Overview

The Scope of Work [[Motion 16142](#)] for the 2024 update to the [[King County Comprehensive Plan](#)] (KCCP) (2024 Update) includes the following direction:

Conduct a land use and zoning study for the Snoqualmie Interchange, and area north of I-90 impacted by the new Interstate 90/Highway 18 Interchange. The study should include, at a minimum, review and recommendation of the appropriate zoning for properties abutting the urban growth area boundary. The study should include the properties west of Snoqualmie Way along SE 99th that could have access to urban services, including whether the area should be included inside the urban growth area, and should recognize and protect the forested visual character of the Mountains to Sound National Scenic byway on Interstate 90 as well as provide appropriate conservation mitigation **via use of the 4:1 program and its requirements for any newly allowed development. The land use and zoning study and land use designations and zoning classifications should focus on solutions for the northwest corner while planning a vision for the properties on the northeast portions abutting the urban growth area. The study should include a review of whether affordable housing and/or behavioral health support services and/or facilities could locate in this area. The study should also ensure potential trail connections for regional trails and adhere to current King County policies. The Executive should collaborate with the City of Snoqualmie, Affected Tribes, Washington state DOT, DNR, property owners, Mountains to Sound Greenway Trust, regional partners and the community.**

pp. 1-2:

Also, we have questions related to the following that immediately follows the Scope of Work above:

"Per Footnote 58 found in the Scope of Work: "This request is like a required study in Chapter 11 of the KCCP, to be done with the Snoqualmie Valley/NE King County Community Service Area Subarea Plan. The County intends to complete the work in Chapter 11 and this scope of work with the Subarea Plan. The entire text is included in the scope of work for context, but if the study requirement in this scope of work is completed with the Subarea Plan, it need not be included in

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

the 2024 update." Given this, both requirements are addressed in the 2024 Update and not in the Subarea Plan."

This wording is very confusing, especially the last two sentences, and should be clarified. For example, is it stating that this study (34 pp and already complete) is *part* of the subarea plan?

pp. 33-34:

We strongly support the **Conclusion and Recommendation** below, as we did during the Growth Management Planning Council's (GMPC's) 4:1 *Program Review* in late 2022 and early 2023.

VII. Conclusion and Recommendation

A. Conclusion

Based on the above analysis, the potential level of development in the study area should remain low intensity to be consistent with the surrounding rural area, to not create new impacts and growth pressure by conversion to urban areas or more intensive rural uses, and to not create new policy or precedent that would incentivize rural to urban conversions in other parts of the county. This furthers the goals of the GMA and Regional Growth Strategy to accommodate growth first and foremost in the urban areas, avoid the conversion of rural lands, protect natural resources, and preserve rural character.

The study area is located in the rural area, adjacent to the UGA and the incorporated limits of the City of Snoqualmie but ineligible to be added to the UGA by long-standing policy. It has been reviewed several times over two decades for inclusion in the UGA, redesignation, and reclassification. Each time, the recommendation has been to maintain the UGA boundary and current land use designation and zoning classification of the area. This has been the conclusion at both the local level through the Comprehensive Plan and, more recently, at the countywide level through GMPC action on the CPPs.

The study area is largely vacant, with the exception of the adaptive reuse of a former recreational vehicle campground as a base of operations for KCSARA. This use operates under current zoning and serves activities that occur largely in the rural and natural resource lands accessed to the east of the study area. This use fits the rural setting because it is low intensity and serves activities occurring in the rural and natural resource lands of the county.

The current RA-5 zoning allows for low-density residential uses that could be clustered as necessary to preserve and protect the numerous streams and wetlands that exist in the area and still remain consistent with rural area character. Additional land uses may be considered as permitted, conditional, and special uses in accordance with K.C.C. development regulations, as discussed above. Affordable housing is unlikely to be located in the study area. Regardless of the potential uses that may occur in the study area, special attention should be paid to the viewshed of the area, critical areas, as well as adequate spaces for potential use as a regional trail.

JOINT RURAL AREA TEAM COMMENTS

The zoning, similar to elsewhere in the study area, supports low-density residential and rural dependent uses. Any intensification of uses in this area beyond what is contemplated by the Rural Area land use designation has the potential to negatively impact the planned function of the imminent improvements to the Snoqualmie Interchange, as well as impact the viewshed from the highway looking north.

Protection of the northwest portion of the study area is an important factor in protecting the forested visual character of the Mountains to Sound National Scenic Byway on I-90. The northeast corner of the study area, abutting the UGA, contains numerous critical areas, and provides a forested gateway into the City of Snoqualmie. This area still provides a significant visual and sound buffer for the residential neighborhoods inside the City.

B. Recommendation

This study recommends that the UGA be maintained in its current location (consistent with current countywide policy) and that the study area keep its Rural Area land use designation and RA-5 zoning classification.

JOINT RURAL AREA TEAM COMMENTS

Sustainable Communities & Housing Projects Demonstration Project
[Sustainable Communities and Housing Projects Demonstration Project](#)

No comments.

JOINT RURAL AREA TEAM COMMENTS

CSA Subarea Plans

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

Vashon-Maury Island CSA Subarea Plan Amendments (Attachment H)

[Vashon-Maury Island CSA Subarea Plan Amendments \(Attachment H\)](#)

Please note that one of our Joint Team organizations, the *Vashon-Maury Island Community Council (V-MCC)*, due to limitations in its By-Laws, is unable to complete its review of the ERP at this early stage. We have encouraged the *V-MCC* to submit its comments separately when ready and fully approved and request the County Council strongly consider them. Consequently, we have *not* included any comments here on this part of the ERP that warrant specific *V-MCC* comment.

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

Snoqualmie Valley/NE King County CSA Subarea Plan

[Attachment B – Snoqualmie Valley/Northeast King County Subarea Plan](#)

Some Joint Team member organizations and Rural Technical Consultants participated in aspects of the Subarea Plan. We consider it to have been well done with extensive efforts made to engage members of the Public. We believe findings of the Subarea Plan strongly support and echo our own Joint Team comments herein urging continued and greater protection of Rural Area, Agricultural lands, and Forestlands with no increase in urban lands, urban-serving businesses, and a priority on sustaining a healthy rural ecosystem and lifestyle.

However, we are disappointed in *Chapter 8 (Transportation)* for its lack of useful information, unlike other chapters of the SVNE Subarea Plan. Lamentably, this is unchanged from the draft Subarea Plan released in June 2023 as part of the Public Review Draft. Extensive recommendations for improvement of the draft plan were submitted last July by one of our affiliated members, Michael Birdsall, a retired transportation planner with extensive experience preparing such plans pursuant to the State Growth Management Act. He submitted his July comments independently, but we were in full agreement with them. We were dismayed to see that *Chapter 8 (Transportation)* made no changes from the June 2023 draft plan – not even to correct a map error he had pointed out that mis-identified a certain county road as a state highway. Also, by way of comparison, our review of the Vashon Subarea Plan shows it has a much more detailed Transportation Chapter. So we are mystified as to why transportation was given so little attention in the SVNE Subarea Plan. The comments Mr. Birdsall submitted earlier remain fully valid and point the way to making significant improvements to Chapter 8, so we now **re-submit** those same comments below. We look forward to seeing substantial expansion of this chapter before it is adopted later this year.

Chapter 8 – Transportation - contains six pages of description of existing conditions, but only one page of forward-looking material (Community Priorities and related Policies). This chapter is lamentably brief. A plan should give citizens and public officials much more information about what's ahead, whether general or specific.

The description of existing facilities and services is long on description of state highways and short on description of county roads. There is only one map in this section – depicting state highways and the outline of city/town boundaries, but not county roads. There should at least be an additional map of county roads depicting functional classifications, and recent traffic volumes on key roads. Additional maps could depict transit routes and services, and should also depict known information about the 20-year future from the traffic and transit forecasts by Puget Sound Regional Council (PSRC), which King County relies upon for countywide transportation planning. (By the way, the map of state highways shows Preston Fall City Road as part of SR 203, While the text description of that route excludes that portion.)

While community priorities identified a number of issues such as facility improvements for active transportation and transit, there is no discussion of how or when the county might deliver such improvements. I do understand the financial difficulties the county faces to maintain roads it now has,

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

let alone upgrade anything. That being the “elephant in the living room”, why isn’t that information shared with the community in the subarea plan? It need not be extensive, as it could summarize the information in the countywide comprehensive plan on that subject. But citizens need to have full knowledge of the financial situation countywide and this opportunity should not be overlooked.

There is no discussion of the traffic growth issues on several heavily used rural arterials – notably Woodinville-Duvall Road, Novelty Hill Road / NE 124th Street, Avondale Road, Bear Creek Road / Mink Road, and West Snoqualmie Valley Road NE. This is remarkable, as these arterials are heavily used for commuting from outlying cities that are rapidly growing under the demands of the growth management policies of the region. Subarea residents are adversely affected by the huge volumes of intercity through traffic. In past decades Duvall and Carnation were the main drivers of traffic growth, but recently Monroe, Sultan, and Gold Bar have added greatly to the pressure on county roads to serve intercity travel. Ironically, congestion on SR 203 through Duvall is now so great that growing numbers of Snohomish County commuters are avoiding that highway and finding their way through bucolic farmland in the Tualco Valley to cross the Snoqualmie River at High Bridge, in order to take West Snoqualmie Valley Road NE down to Woodinville Duvall Road and/or Novelty Hill Road. In a perfect world these commuter flows would not be on county roads at all, but use state highways to reach their destinations. Alas, neither SR 203 to I-90, nor SR 522 to I-405, provides adequately for commuters out of Snohomish County. There should be some discussion of these problems in the subarea plan.

An over-arching concern is that the through commuter traffic that troubles area residents comes from cities, even another county, that do not contribute any tax revenue to the county road fund, yet the county puts high priority on maintaining those roads first because of the high volumes of traffic using them. So all taxpayers are not being treated equally. This is the crux of the county’s fiscal dilemma, and is well known to county officials and observant citizens. In the absence of fiscal relief from any regional or higher entities, after ten + years of pleading, I think it is time for the county to consider prioritizing its limited revenues in service of its own residents, rather than giving first priority to the freeloading commuters from other jurisdictions. That could mean applying traffic calming measures in some corridors to limit through traffic so as to shift some through traffic back to state routes, and maintaining the physical condition of local roads at least as well as the regional arterials.

One example could be to designate West Snoqualmie Valley Road NE for local service to adjacent properties only, and enforce this designation by closing the road somewhere south of the High Bridge. This would save the county considerable expense of maintaining a high volume thoroughfare on an unstable hillside, with (arguably) minimal inconvenience to the residents it serves and considerable benefit to said residents from the reduced traffic volumes. It could also mean reducing speeds on regional arterials and re-configuring intersections so that local residents enjoy better access to the arterials in peak commuter hours. This could be guided by the County’s rural level of service policy (B) which is not satisfied today at many intersections for the local access movements.

Some attention is given to transit service in the subarea, but more could be said about the potential for intercity transit to alleviate the congestion on regional arterials discussed above. In particular, what would be the benefit of a greater allocation of transit bus-hours to those corridors (beyond the status

JOINT RURAL AREA TEAM COMMENTS

quo) – i.e., prioritizing transit service on the basis of reducing vehicle-miles-of-travel by cars in long-distance corridors, rather than on maximizing ridership in (more urban) short-distance corridors?

More service to active transportation is mentioned as a desire of the community, and shoulder-widening is mentioned as a suitable response. The draft plan says Road Design and Construction Standards call for roadways to have shoulders for multipurpose use (including walking and biking), and describes those standards as meeting the safety and mobility needs of the public. The fallacy here is that most county roads lack useable shoulders for active transportation, and thereby fail to meet the standard. Upgrading all 555 lane miles in the subarea to meet the standard is clearly not feasible in our lifetime, so when and where will improvements be made, and why? The table of county road assets lists road miles, lane-miles, sidewalks and bike lanes, but does not include an inventory of shoulders of suitable width for active transportation.

There is no discussion of any approach for upgrading shoulders to meet the design standard. For example a table of shoulder width needed for safety and mobility could be arrayed against traffic volumes, with the ultimate shoulder width per the design standard being associated with some high volume of traffic, and lesser width being tolerated at lower traffic volumes.

I hope that by sharing this potpourri of impressions and suggestions, a better and more useful subarea plan can be produced.

JOINT RURAL AREA TEAM COMMENTS

Reports

JOINT RURAL AREA TEAM COMMENTS

Middle Housing Code Study

[Middle Housing Code Study](#)

Theme

- Multi-family housing should NOT be outright allowed in Rural Towns

Specific Comments

3. Recommendations

[table of recommendations, pp. 19 thru 23 (note, there is no title on the table)]

p. 21:

Recommended Change 3. “Remove CUP requirement and outright allow duplex, triplex and fourplex throughout the R-1 to R-48 zones (including Rural Towns), with restrictions for the R-1 zone to match current regulations”

Rural Towns should not be viewed as part of the answer to affordable, middle housing. In general, Rural Towns lack transit, jobs, and do not historically include multi-family, middle housing in their character. Seeking to greatly increase population and housing in Rural Towns is not a viable solution to King County's housing needs, nor should any such proposal be entertained.

Further, this proposal to “Remove CUP requirement and outright allow duplex, triplex, and fourplex...in Rural Towns” is in conflict with the following four Policies documented in **Chapter 3, RURAL AREAS AND NATURAL RESOURCE LANDS:**

- R-301:** **King County shall use all appropriate tools at its disposal to limit growth in the Rural Area and Natural Resource Lands, such as land use designations, development regulations, level of service standards and incentives, to:**
- a. Retain ((A)) a low growth rate ((is desirable for the Rural Area, including Rural Towns and Rural Neighborhood Commercial Centers, to));**
 - b. ((e)) Comply with the State Growth Management Act((;));**
 - c. ((continue preventing)) Prevent sprawl, the conversion of rural land, and the overburdening of rural services((;));**
 - d. ((f)) Reduce the need for capital expenditures for rural roads((;));**
 - e. ((m)) Maintain rural character((;));**

JOINT RURAL AREA TEAM COMMENTS

- f. ~~(p))~~ **Protect the environment, and**
- g. ~~((r))~~ **Reduce ~~((transportation-related))~~ greenhouse gas emissions. ~~((All possible tools may be used to limit growth in the Rural Area. Appropriate tools include land use designations, development regulations, level of service standards and incentives.~~**

A low growth rate for Rural Towns does NOT include expanding multi-family housing. Further, such action would overburden rural services, NOT maintain rural character, and would only increase transportation-related greenhouse gases as new residents commute to far-away urban jobs.

- R-302 Residential development in the Rural Area should only occur ((as follows)):**
- a. **In Rural Towns at a variety of densities and housing types as services an infrastructure allows, compatible with ((maintenance)) protection of historic resources and community character; and**
 - b. **Outside Rural Towns at low densities compatible with traditional rural character and uses((,)); farming, forestry, and mining; and rural service levels.**

"Compatible with community character" of Rural Towns does NOT include duplexes, triplexes, and fourplexes in Rural Towns, where very few, if any, such accommodations exist. Such housing is urban in nature and belongs almost exclusively inside the UGA.

- ~~((R-507))~~ **R-503b Rural Towns serve as activity centers for the Rural Area and Natural Resource Lands 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 rural character:**
- a. **Retail, commercial, and industrial uses to serve the surrounding Rural Area and Natural Resource Lands population;**
 - b. **Residential development, including single~~((family))~~ detached on small lots as well as multifamily housing and mixed-use developments;**
 - c. **Other retail, commercial, and industrial uses, such as resource industries, tourism, commercial recreation, and light industry; and**
 - d. **Public facilities and services such as community services, parks, ((churches)) places of worship, schools, and fire stations.**

While **R-503b** does include multi-family housing in Rural Towns, this should only be on a very limited scale and only within the capacity of rural services, while maintaining the existing historic character of each Rural Town. The recommendation to "remove CUP requirement and outright allow" extensive multi-family housing in Rural Towns would completely change the character of these Towns and will be certain to create severe backlash from town residents (as has already occurred in Fall City with extensive single-family home development).

JOINT RURAL AREA TEAM COMMENTS

R-506 *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 achieved in Cities in the Rural Area, when appropriate infrastructure is available.*

We applaud the Executive's underlined proposed addition, as it is very well placed and needed, as "appropriate infrastructure" includes roads, bridges, etc. and existing and even planned infrastructure do not support such increased densities, etc.

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

Vashon-Maury Island P-Suffix Conditions Report

[Vashon-Maury Island P-Suffix Conditions Report](#)

Please note that one of our Joint Team organizations, the *Vashon-Maury Island Community Council (V-MCC)*, due to limitations in its By-Laws, is unable to complete its review of the ERP at this early stage. We have encouraged the *V-MCC* to submit its comments separately when ready and fully approved and request the County Council strongly consider them. Consequently, we have *not* included any comments here on this part of the ERP that warrant specific *V-MCC* comment.

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

Update on Best Available Science & Critical Areas Ordinance Review

[Update on Best Available Science and Critical Areas Ordinance Review](#)

We await the King County Executive recommended version — **Critical Areas Ordinance (CAO) Amendment** and **Best Available Science (BAS) Report** — to be submitted to the King County Council on March 1, 2024.

The State requires updates to both BAS and the CAO. This will be the first significant review and update of CAO since 2004.

Critical areas regulations are intended to protect public health and safety and the environment. They apply to new development and land-use activities. They must be based on BAS and demonstrate “*special consideration*” for anadromous fisheries.

Critical areas include: Riparian Areas (i.e., aquatic area buffers); Wetlands; and Geologically Hazardous Areas. These constitute the areas for BAS Review.

The updated State framework calls for a requirement for no net loss (NNL) of ecological functions and values. Critical area impacts are allowed, but require compensatory mitigation. King County uses mix of regulations, programs, projects and partnerships to achieve no net loss. The new State requirements include planning for Climate Change.

County Code will be updated. There also will be non-regulatory actions including: mapping, policies, investments, design manuals, forest planning, fish passage planning, and floodplain reconnection projects.

On December 12, 2023, we received the following from Michael Murphy in the King County Department of Natural Resources and Parks (DNRP) — Water and Land Resources Division:

- Summary of BAS in findings and policy considerations (9 pp)
- BAS-driven amendments to King County Code/CAO (185 pp) *
- BAS-driven amendments to the Comprehensive Plan (13 pp) *

**These amendments were drafted generally based on the June 2023 Public Review Draft for the 2024 Comprehensive Plan Update and will be updated based on the Executive Recommended Plan for the final submittal to Council in March 2024.*

So far we are in general approval of all the materials we have received and consider this update well done.

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

Vashon Rural Town Affordable Housing Special District Overlay Final Evaluation

[Vashon Rural Town Affordable Housing Special District Overlay Final Evaluation](#)

Please note that one of our Joint Team organizations, the *Vashon-Maury Island Community Council (V-MCC)*, due to limitations in its By-Laws, is unable to complete its review of the ERP at this early stage. We have encouraged the *V-MCC* to submit its comments separately when ready and fully approved and request the County Council strongly consider them. Consequently, we have *not* included any comments here on this part of the ERP that warrant specific *V-MCC* comment.

JOINT RURAL AREA TEAM COMMENTS

Other Documents

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

Supplemental Changes to the 2024 KCCP (A-23)

No comments.

JOINT RURAL AREA TEAM COMMENTS

Draft EIS

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

Draft EIS

[Draft Environmental Impact Statement](#)

PLEASE NOTE ALL JOINT TEAM'S DEIS COMMENTS BELOW PREVIOUSLY WERE SUBMITTED TO THE KING COUNTY SEPA OFFICIAL, IVAN MILLER, ON JANUARY 30, 2024, TO MEET THE JANUARY 31, 2024, DEADLINE FOR SAME.

We understand per **WAC 197-11-442(4)** an EIS for a comprehensive plan calls for a discussion of alternatives that:

"...shall be limited to a general discussion of the impacts of alternate proposals for policies contained in such plans, for land use or shoreline designations, and for implementation measures. The lead agency is not required under SEPA to examine all conceivable policies, designations, or implementation measures but should cover a range of such topics."

With the above in mind, while we support much of what is described in the **Extensive Change Alternative** considered, such as "Require cities to pay impact fees and implement traffic demand management strategies for large developments that impact unincorporated areas," we have **highlighted** several concerns, as detailed in the sections below.

EXECUTIVE SUMMARY

p. ES-4:

We have concern with the following statement in that "all unincorporated areas" includes, by definition, the Rural Area:

*"For example, the Extensive Change Alternative would seek to achieve the proposal objectives by **expanding mandatory inclusionary housing** to all unincorporated areas."*

p. ES-6:

We have concerns with the following as related to greater: (1) Land conversions in the Rural Area and Natural Resource Lands and (2) Urban development in the Rural Area:

"Extensive Change Alternative

The Extensive Change Alternative includes mandatory programs and requirements to implement more substantial changes related to land use, zoning classifications, and development standards

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

compared to the Limited Change Alternative. The County would be expected to make progress in meeting its objectives to address equity, housing, and climate change and the environment under this alternative to a greater degree than under both the No Action Alternative and Limited Change Alternative. Following are **examples** of potential impacts from the Extensive Change Alternative, whether positive or negative.

Natural Environment

In comparison to the Limited Change Alternative, the Extensive Change Alternative would help the County to a greater degree in meeting its greenhouse gas emissions reduction goals and protecting water resources, farmland, critical areas, and natural habitat from development. However, the Extensive Change Alternative **could result in a greater conversion of Rural Area and Natural Resource Lands through policies that provide expanded allowances for the development of renewable energy, resorts, or industrial uses** than the other alternatives. The Extensive Change Alternative would require, rather than incentivize, active production of farmland in agricultural zones, which could result in greater localized water quality impacts within areas zoned for agriculture as compared to the Limited Change Alternative.

Built Environment

The Extensive Change Alternative includes greater allowances for density and requirements for inclusionary housing than the Limited Change Alternative. It could increase the variety of housing options and lead to development patterns within and closer to existing urban areas and those served by public transit. This would support housing for a broader range of income levels and lead to a more efficient expansion of utility and public services than compared to the Limited Change Alternative. Substantial increases in allowances for temporary and emergency housing would support short-term housing needs, though could necessitate an increase in social service provider staff and resources.

The Extensive Change Alternative would conserve more land as rural through the TDR Program and make more substantive updates to the Four-to-One Program requirements, including changes that are more likely to increase participation. As with the Limited Change Alternative however, the Extensive Change Alternative could alter the geographic pattern of land designated for conservation, including **greater urban development within unincorporated rural areas. Tourism, resort, and economic development-oriented buildings would be allowed to a greater degree in the Rural Area, on Natural Resource Lands, and within agricultural zones, which could result in development inconsistent with the existing character of those areas.**"

2. PROPOSED ACTION AND ALTERNATIVES

Our comments on the **Table 2.3–1. Alternatives Examples Table** (pp. 2-5 thru 2-21) below only deal with the “Extensive Change Alternative” column.

JOINT RURAL AREA TEAM COMMENTS

Equity (pp. 2-5 thru 2-8):

(p. 2-5):

“Reduce housing and business displacement and advance equity for those who are Black, Indigenous, People of Color, immigrants, and/or refugees, especially those who also earn less than 80% of the AMI.”

(p. 2-5): **“Expand inclusionary housing or require mandatory inclusionary housing in all unincorporated areas, including Rural Towns.”**

Climate Change and the Environment (pp. 2-11 thru 2-14):

(p. 2-11 to 2-12):

“Align with and advance the King County 2020 Strategic Climate Action Plan to reduce GHG emissions, support sustainable and resilient communities, and prepare for climate change.”

(p. 2-12): **“Allow additional clearing of trees and vegetation in unincorporated King County, without a permit, for habitable structures and utilities.”**

(p. 2-13 to 2-14):

“Increase the amount of land that is preserved for conservation.”

(p. 2-13): **“Make substantive updates to the Four-to-One program requirements, such as:**

- Using joint planning area boundaries.**
- Allowing for reduced open space ratio.**
- Allowing for noncontiguous open space.**
- Allowing urban-serving facilities in the Rural Area.**
- Allowing nonresidential projects.**
- Allowing projects not likely to be timely annexed.”**

(p. 2-14): **“Modify and expand the TDR program, such as providing bonus TDRs for sending sites that are in the Forest zone or are vacant marine shoreline without bulkheads, allowing TDR sending sites on Vashon-Maury Island, allowing urban open spaces that were previously acquired using conservation futures tax funding or urban separators to become TDR sending sites, removing specific goals for reduction of development potential outside the Urban Area, allowing TDRs to be used for duplex units in the Urban Area and Rural Towns, and allowing for payment into the TDR bank when TDRs are not available.”**

General (pp. 2-14 thru 2-21):

(p. 2-15 to 2-16):

JOINT RURAL AREA TEAM COMMENTS

“Address the outcomes of the County Subarea Planning Program.”

(p. 2-16): **“Make substantive updates to the existing land use designations and zoning classifications in the Snoqualmie Valley/NE King County subarea, such as updating the allowed uses in the Fall City Business District Special District Overlay and removing some conditions to create parity with adjacent properties. For example:**

- **Incentivize agritourism, including options for compatible uses (education, experiences, value-add, processing, sales).**

(p. 2-17 to 2-18):

“Update transportation policies.”

We suggest that all ten items listed under the **“Extensive Change Alternative”** column be moved to and replace the comparable ten items under the **“Limited Change Alternative”** column, as these all constitute activities we would like to see implemented.

(p. 2-18):

“Improve regulations governing rural and natural resources.”

(p. 2-18): **“Expand SEPA exemptions to the maximum allowed by WAC 197-11-800.”**

(p. 2-18 to 2-21):

“Implement land use designation and zoning classification changes.”

(p. 2-18): **“Allow resorts in additional areas with limited development conditions, beyond the existing permitted use.”**

(p. 2-18): **“Allow for additional material processing uses in additional zones, with limited development conditions.”**

(p. 2-19): **“Make more extensive changes to manufacturing and regional land uses allowed in the Industrial zone and remove the prohibition outside the UGA or revise the uses that require a conditional or special use permit.”**

(p. 2-19): **“Make more extensive changes to development standards in anticipation of new and innovative industrial uses.”**

- **“Encourage rural economic development, rural economic strategies, and tourism in the rural area and on Natural Resource Lands.”**
- **“Encourage agrotourism in the Rural Area, especially where there is the opportunity for compatible uses, such as educational experiences, value-added processing, and sales.”**
- **“Modify the uses permitted in the Rural Area to implement rural economic development goals.”**

(p. 2-19): **“Allow mineral extraction operations with fewer development conditions.”**

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

(p. 2-20): "...Consider how mixed-use developments, at an appropriate size and scale, could support rural economic and agritourism opportunities, the number of mixed use developments needed, and what uses would be allowed." **[This is in the "Limited Change Alternative" column.]**

(p. 2-20): "Allow food stores in the Rural Area zone with minimal development conditions."

(p. 2-20): "Make more extensive land use designations and zoning classification changes based on area-wide evaluation of the UGA and permitted densities, such as moving the UGA boundary and/or increasing the density and intensity of use."

(p. 2-21): "Allow for additional industrial zoning classification in the Rural Area and on Natural Resource Lands."

2024 KCCP Major Update Executive's Recommended Plan

JOINT RURAL AREA TEAM COMMENTS

Glossary

Our explanation and rationale for **recommended changes** herein are given as **[COMMENT:....]**.

p. G-6:

Community Service Area Subarea Plan

~~((With King County's initiation of the subarea planning program, the new plans will be called)) Community Service Area Subarea Plans((-These will)) apply the countywide goals of the Comprehensive Plan to smaller geographic areas consistent with the Community Service Area Program. ((Each one of King County's six rural GSAs and each of the five large Potential Annexation Areas has or is scheduled to have its own CSA Subarea Plan. CSA Subarea Plans focus on land use issues in the smaller geographies, ((as well as community identified implementation activities)) while recognizing the parameters of County funding and revenue sources.)) These plans help implement and are consistent with the Comprehensive Plan's policies ((and development regulations)) **and County Code**.~~

[COMMENT: Since the phrase “and development regulations” is proposed to be removed above, we recommend adding the phrase “and County Code,” as these plans must be consistent with King County Code.]

p. G-8:

Cumulative impacts

Cumulative impacts ~~for the purposes of Chapter 6, Shorelines~~ are the sum total of the current, plus any reasonably foreseeable future disturbances to **ecological functions the environment and quality of life**, which can be impacted by both development subject to shoreline permits and by development that is not subject to permits.

[COMMENT: Why *only* for the shorelines?. “Cumulative impacts” are important in many other areas. For example, we have suggested that the cumulative impacts of adjacent or nearby mining sites on road infrastructure, pollution, noise, etc. be assessed and addressed. Consequently, we suggest “Cumulative impacts” pertain to anything and their impact on the environment and quality of life.]

p. G-12:

Feasible

JOINT RURAL AREA TEAM COMMENTS

Feasible means, **for the purpose of ((this)) the Shoreline Master ((p))Program**, that an action, such as a development project, mitigation, or preservation requirement, meets all of the following conditions:

- (a) The action can be accomplished with technologies and methods that have been used in the past in similar circumstances, or studies or tests have demonstrated in similar circumstances that such approaches are currently available and likely to achieve the intended results;
- (b) The action provides a reasonable likelihood of achieving its intended purpose; and
- (c) The action does not physically preclude achieving the project's primary intended legal use.

In cases where these guidelines require certain actions unless they are infeasible, the burden of proving infeasibility is on the applicant. In determining an action's infeasibility, the reviewing agency may weigh the action's relative public costs and public benefits, considered in the short- and long-term time frames.

[COMMENT: Why only for the SMP?. "Feasible" could pertain to anything. It's used throughout the Comprehensive Plan, e.g., at least a dozen times in Chapter 3 alone. Consequently, we suggest we we have **highlighted above be removed from the first sentence.]**

p. G-34:

Transportation Facilities and Services

Transportation facilities **and services** are ~~((the physical assets))~~ elements of the transportation system that are used to provide mobility. They include roads, sidewalks, bike lanes and other facilities supporting ~~((nonmotorized travel))~~ active transportation, transit, bridges, traffic signals, ramps, buses, bus garages, park and ride lots and passenger shelters. **Transportation services are programs and activities to maintain the transportation system and provide information and assistance to citizens about use of the transportation system.**

[COMMENT: "Transportation Services" are distinct from "Transportation Facilities" and, thus, need to be described separately.]

p. G-35:

Transportation Needs Report ~~((TNR))~~

The ~~((TNR))~~ Transportation Needs Report is a comprehensive list of ~~((recommended e))~~ County road system transportation needs ~~((through the year 2022 needed))~~ to implement serve the mobility needs of the land use element of the Comprehensive Plan. **It includes transportation needs for the unincorporated King County road network ((, and some city, state, and adjacent county projects)).** It does not include transit service, city and state needs, or capital needs **for such related things as maintenance buildings.** (See Chapter 8(=:); Transportation, and Appendix C1, Transportation Needs Report)

JOINT RURAL AREA TEAM COMMENTS

[COMMENT: If our recommendations above are accepted, this definition would read as follows:

Transportation Needs Report

The Transportation Needs Report is a comprehensive list of County road system needs to serve the mobility needs of the land use element. It does not include transit service, city and state needs, or capital needs for such related things as maintenance buildings. (See Chapter 8: Transportation, and Appendix C1, Transportation Needs Report)]

From: [Lacy Linney](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: Short term rental control in Fall City (and King County)
Date: Tuesday, February 6, 2024 7:45:45 PM

Hello,

I would like to provide feedback regarding the increasing number of short term rentals in Fall City and ask that short term rentals be evaluated for impact to available housing and be considered as a part of the discussions/updates to the Comprehensive Plan.

This is an important topic because in my small neighborhood of 43rd street (on the east side of Preston-Fall City Road only), we have around 18 houses in our neighborhood and 2 are short term rentals through AirBnB or VRBO. These 2 houses are typical FC residences which are smaller from a footprint size and sold in the last ~3 years between \$480 - 580k, which to me, is more affordable housing than many options on the market right now.

Considering the focus on housing availability and affordability, I would ask that:

- Short term rentals are factored into evaluations of our housing availability issues
- Expanded effort to understand how many short term rentals are in King County
- Policy that mimics other county's who have already implemented limits on short term rentals (like Chelan County).

Thank you in advance for taking the time to read my email.

Best,
Lacy Linney
34132 SE 43rd St
Fall City
206-819-1909

**KC Council 2024 KCCP Update
Local Services & Land-Use Committee Briefings**

Joint Team Oral Testimony Themes and Recommendations

February 7 — LSLU Committee – Briefing 2

Chapter 1: Regional Planning [Ken Konigsmark]
--

My name is Ken Konigsmark, a rural Preston resident. I'm on the Joint Rural Area Team and have served on several County committees related to rural issues, conservation, growth management, and the critical areas ordinance.

My over 30 years experience in these issues reveals that despite good plans, good policies, well-intentioned Execs and Councilmembers, and well-designed County Guiding Principles, I and large numbers of rural residents remain frustrated because often your own codes, policies, and principles are poorly followed or ignored.

The words are great, we love and support them, but it's the actions or inaction that follow that truly matter. These words ring hollow unless King County truly upholds and enforces them.

For example, we fully support all six King County Guiding Principles listed in Chapter 1 REGIONAL PLANNING. However, we too often see the County making decisions directly affecting the Rural Area that seem to defy and *circumvent* at least *three* of those principles.

Preserving and Maintaining Open Space and Natural Resource Lands
Directing Development Toward Existing Communities
Achieving Environmental Sustainability

Examples of such actions (or *non-actions*) that defeat these principles and policies and infuriate rural residents include, but are *not* limited to:

- Cedar River Asphalt Facility (Determination of Non-Significance; *no* Environmental Impact Statement [EIS])
- Cedar Hills Regional Landfill (piecemeal expansion)
- Code Enforcement (poor to none): Violators routinely win and citizens who seek to uphold County codes and policies are forced to spend enormous sums trying to protect their own property, the rural area, and the environment, often AGAINST King County!
- Illegal Clearcutting
- Illegal Event Centers allowed to continue
- Illegal "Recycling" Centers that violate multiple codes
- Pacific Raceways (piecemeal expansion without an EIS)
- Permits routinely granted for development that violates zoning laws and the principles underlying them
- Wineries / Breweries / Distilleries allowed to continue in the RA

I could go on but will end by simply imploring you to not just approve these guiding principles and the entire Comprehensive Plan, but to then fight to uphold them when needed, to support

**KC Council 2024 KCCP Update
Local Services & Land-Use Committee Briefings**

Joint Team Oral Testimony Themes and Recommendations

the rural residents who truly wish for King County to uphold their own policies and enforce their own laws. Take a strong stand on OUR side!

Growth Targets & UGA Appendix [Peter Rimbo]
--

My name is Peter Rimbo. I am the Coordinator for the Joint Team. I will speak on Growth Targets.

Unfortunately Growth Targets cannot be enforced to keep *irresponsible* cities, such as Black Diamond, from *grossly* overgrowing *directly* impacting County roads and rural residents and *vastly* underpaying for road maintenance based on their proportional usage.

The numbers in *Figure 5: King County Jurisdiction Growth Targets ...* were adopted in the 2021 CPPs and we offered detailed written comments at the time. Black Diamond, a designated “*City in the Rural Area*,” has been allocated a 2044 Housing Target of 2,900, which its *already approved* Master-Planned Developments will *grossly* exceed. It also has major non-MPD permit applications under consideration.

To make matters worse, Black Diamond has been allocated a 2044 Job Target of *only* 690—an *anomaly* compared to the *Housing/Job Target* ratios for every other city listed! Thus, the *vast majority* of its 20,000+ new residents will commute on County roads to their jobs in the major cities, as they avoid the increasingly congested SR-169. All other cities listed are handling their *Targets* in a professional and civil manner, leaving Black Diamond alone as an *irresponsible* city that is knowingly overloading County roads and imposing an unfair and inequitable financial burden on the Rural Area taxpayers.

While the *Urban Growth Capacity Report* finds sufficient capacity available for *total* UGA projected growth, it does *not* state any concern or remedy for those cities that *grossly exceed* their projected growth and what “*reasonable measures*” they should take to correct such inconsistencies and the resulting burdens placed on their neighbors. Consequently, such inconsistencies will not be addressed by these cities in their respective 2024 Comprehensive Plans. We call for the Growth Management Planning Council to have such cities regularly report on how they are handling such inconsistencies and resulting burdens.

The current Growth Target and Allocation system is badly flawed and, by ignoring those flaws, we perpetuate them *ad infinitum*.

From: [Brian Greggs](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: 2/21/24 Comp Plan meeting feedback
Date: Tuesday, February 13, 2024 2:19:46 PM

I am writing in support of Proposed Ordinance No. 2023-440, "Sustainable Communities and Housing Projects Demonstration Project Area Zoning and Land Use Study". In particular, I support and encourage the further exploration and development of the Brooks Village parcels, to help ensure equitable rental and/or homeownership opportunities for Skyway residents at risk of displacement. Thanks for your consideration.

Best,
Brian Greggs
98178 resident

From: [jamminjay](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: Leave Vashon as is!
Date: Wednesday, February 14, 2024 8:13:15 AM

This island is fragile. The main roads, because of the terrain that shape them, are already so busy. I feel for the people that live on them as they wait to enter the traffic. There are people screaming for affordable housing. But the truth is, this island will never be affordable! The ferry line will further upset W. Seattle. Come here and buy gas, or groceries or anything, and get a feel for the COL. This can't be looked at one in a one dimensional aspect! At the age of 67 I've seen so many islands loved to death. Once over developed you can't undo it. SLOW GROWTH IS EVERYTHING!

Sent from my T-Mobile 5G Device

From: [Amy Taylor](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: Comp Plan EIS public comment
Date: Tuesday, February 13, 2024 1:46:40 PM

This is a very nit picky small comment, but on Figure 4.1-1 of the draft EIS, page 107 - In the North Highline/White Center area, Water District 45 no longer exists. That area was absorbed into Water District 20 a few years ago after residents voted to consolidate. Probably should update this map.

Thanks!
Amy Taylor

From: [J.A.H.](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: signs all over our one hwy on Vashon
Date: Saturday, February 17, 2024 1:19:24 PM

Greetings,

Can you tell me who and what dept I can speak with about onslaught of signs on our hwy here on Vashon. It is unbelievable. I have lost of issues with it.

thanks
jo ann

From: ELIZABETH CIAPALA
To: info@kingcountyfloodcontrol.org; [KCC - Legislative Clerks \(Email Group\)](#)
Subject: Flood Control for Old Shake Mill Levee
Date: Tuesday, February 20, 2024 4:21:52 PM
Attachments: [image001.png](#)

Good afternoon, I wanted to provide feedback regarding this project which was approved for repair and completed late 2020. Shake Mill Right Bank Levee Repair, North Fork Snoqualmie River, River Mile .3.

<https://your.kingcounty.gov/dnrp/library/water-and-land/flooding/snoqualmie/shake-mill-right-bank-30-percent-planset-2020.pdf>

As you are probably aware the first winter rains in early 2021 washed out the replacement repair leaving the bank to continue to erode for the past 3 years. We need to get this repaired property and included in either the KC Comprehensive Plans or the sub-plans for prioritization and budgeting. I have included a picture of the eroded bank below. I can also provide a video of the area if you have a folder or dropbox to copy over.

Thank you in advance. Please do not hesitate to contact me if you need additional information. –Elizabeth



February 18, 2024

To: The Local Services and Land Use Committee

From: Terry Lavender
17304 208th Ave. N.E.
Woodinville, WA 98077
tmlavender8@gmail.com

Re: Testimony regarding Chapter 5, The Environment, of the Executive
Recommended 2024 King County Comprehensive Plan

My name is Terry Lavender. I am a member of the Joint Rural Area Team and serve as an Environmental Technical Consultant. I have been involved in Basin Planning, Land Conservation, and Comprehensive Plan reviews for many years. I am specifically commenting on Chapter 5 of the Executive Recommended 2024 King County Comprehensive Plan.

We are pleased to see the Climate Action Plan permeates every aspect of this chapter. Almost all Climate Actions are “*shall*” making the intent strong. The language throughout is updated to match current practices and the Climate Action Plan. New to the Climate Plan is *Climate Equity* and equity language is added throughout and strengthened with “*shall*.”

There are strong statements for a multi-species approach and biodiversity. It is stated that Biodiversity refers to species, habitats and their interactions across all landscapes. There is an emphasis on preserving and restoring ecosystem processes. All of this adds up to our best opportunity to really achieve these goals.

I applaud the focus on mapping, collaboration and monitoring.

At one of the first King County meetings I went to back in 1988, the public was there to ask about Beavers. I applaud the statement that King County supports coexistence of beaver and people, but I do wonder what implementation will look like.

There is much to love about the proposed Chapter 5. However, while we find strong policies in the Executive’s “*Recommended Plan*,” they depend on how they are implemented, if and how periodic monitoring is funded and staffed, and that enforcement happens when needed. Our experience has been that each of these are problems currently and historically. Structural changes and funding issues will need to be solved before the County can truly honor and accomplish the good policies herein.

From: [VenLin Joseph Chan](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: Comprehensive Plan Review Comments
Date: Sunday, March 3, 2024 7:33:25 PM

Dear Councilmembers,

Rural Economic Development - Rural Tourist District

Following just released King County Executive Recommended revision and current existing Comprehensive Plan on rural economic development, suggest to establish a Rural Tourist District on the east side of 140th Place NE of Woodinville from Woodinville City south boarder down to the joint with 148th Ave NE.

According to existing stated policy, the rural economic development shall follow the direction of local special conditions and resources. The stretch of east side of 140th Place NE neighborhood has the special open view of the valley which attracts people work and dwell in cities.

Sincerely,
Woodinville Rural Citizen
Venlin J. Chan
360-907-9493 mobile

From: [VenLin Joseph Chan](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: Comprehensive Plan Review Comments
Date: Sunday, March 3, 2024 3:21:04 PM

Dear Councilmembers,

Rural Traffic/Transportation - Rural Artery Roads Improvement Policy

Rural Artery roads are roads between urban cities passing through rural, the one particularly in my neighborhood is the one of 140th Pl NE in rural Woodinville, which connecting Woodinville city with Redmond, Kirkland, and others. It is vital to the rural local basic life activities and development. The traffic has been getting crowded year over year, mostly not from rural local, but from developments in the cities.

There has been an skewed wrong policy on rural transportation; not allowing rural artery road improvement to discourage rural development.

The developments over the past years were almost all from the cities.

The rural development has been already strictly controlled and limited by KC Land Use codes. The road improvement, especially the artery road improvement should be entirely based on traffic frequency monitoring facts.

This is a principle Equity issue. Please kindly pay your attention on this issue.

Sincerely,

Woodinville Rural citizen
Venlin J. Chan
360-907-9493 Mobile

From: [Compplan](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: Docket request
Date: Wednesday, February 21, 2024 5:10:32 PM
Attachments: [KCCP Docket Request Form 2021 Michel Kary.docx](#)

King County Comprehensive Planning Team

[Sign up](#) for email updates about the 2024 King County Comprehensive Plan Update.

From: [Krueger, Morgan \(DFW\)](#)
To: [Legislative Staff, Council CompPlan](#); [Compplan](#)
Cc: [Berejikian, Marian \(DFW\)](#); [Whittaker, Kara A \(DFW\)](#); [Reinbold, Stewart G \(DFW\)](#); [Stapleton, Timothy R \(DFW\)](#); [Shaw, Ryan C \(DFW\)](#); [Bockstiegel, Liz \(DFW\)](#)
Subject: Draft Flood Code Comments
Date: Thursday, February 29, 2024 10:51:51 AM
Attachments: [image001.png](#)
[WDFW CAO and Comp. Plan Comments Final \(1\).pdf](#)
[King County Flood Code Comments.pdf](#)

Hi King County Comprehensive Plan team,

I was directed to send WDFW code-related comments to the Comprehensive Plan emails included here. Please direct these comments elsewhere if this has changed. I have also included previous Critical Area Ordinance draft comments in the chance they did not reach the official record when originally sent.

Thank you for receiving and reviewing WDFW's comments in relation to these important regulatory updates. We strive to provide Best Available Science resources and guidance to all jurisdictions currently planning under the current Periodic Update review period. Please do not hesitate to reach out to me with any comments or questions.

All the best,



Morgan Krueger (she/her)
Regional Land Use Planner, Habitat Division
Washington Dept. of Fish and Wildlife
Region 4

Morgan.Krueger@dfw.wa.gov

425-537-1354

From: [Camp, Cherie](#) on behalf of [Clerk, King County Council](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: FW: COMMENT FOR 2/27 KING COUNTY COUNCIL MEETING
Date: Tuesday, February 27, 2024 12:32:43 PM

From: Simone Oliver <simone@altoliver.com>
Sent: Monday, February 26, 2024 8:40 PM
To: Clerk, King County Council <Clerk@kingcounty.gov>
Subject: COMMENT FOR 2/27 KING COUNTY COUNCIL MEETING

My name is Simone Oliver and I've been a Carnation resident since 1994. I have a environmental consulting firm that works regularly in unincorporated King County. I'm very familiar with codes pertaining to land use.

The STG/Remlinger vested use is not legal. It is a gross expansion of the existing use that has never included public concerts of this magnitude. Everything they've hosted since the early 90's has been much smaller private corporate picnics and private music concerts. The non-conforming code section KCC 21A.32.065 does not allow for expansion of existing non-conforming use by over 10%, which this clearly exceeds the vested use in both number of attendees and change of use.

In the rationale provided by Remlinger to document their vested use, the average attendees were provided on an annual basis, not an event basis. It is unclear how many attendees were present per event, which is necessary to accurately document past use. Regardless, from the data they provided, 3866 is the average high number of attendees in one event and 25 is the average amount of events per year. The vesting granted by King County represents 6000 people per event for up to 34 times per year. This reflects an increase of 55% in number of attendees and 36% increase in frequency of events over the vague data provided by Remlinger. This does not comply with the non-conformance code section KCC 21A.32.065.A.2 that limits maximum expansion to 10% and Jim Chan's decision '*that the use may continue, provided that:...any modification or expansion of the use complies with nonconformance standards in KCC 21A.32*'. Based on this alone, the vesting certificate should be revoked per code section KCC 21A.50.040.2 '*The approval was based on inadequate or inaccurate information.*'

This venue has never been an 'open-air theater' as the vesting interpretation states granting them full, unappealable green light to play by a different set of rules, or no rules in this case. I had hoped that making back-room deals was a thing of the past, but apparently that's not the case. The county needs to do the right thing and revoke this vesting certificate and require STG/Remlinger to go through the standard TUP/CUP process as required by law. This process allows for public review and input, SEPA, multi-agency review and mitigation for impacts.

This venue is not allowed under the state shoreline act as administered by DOE. The whole site is located within the floodway and floodplain of the Tolt River.

Thank you.

Simone Oliver – altoliver@comcast.net

From: [Camp, Cherie](#) on behalf of [Clerk, King County Council](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: FW: Council Meeting
Date: Tuesday, February 27, 2024 12:32:34 PM

From: Steve Foster <sf.bluebiu@gmail.com>
Sent: Monday, February 26, 2024 9:06 PM
To: Clerk, King County Council <Clerk@kingcounty.gov>
Subject: Council Meeting

My name is Steve Foster – I’ve lived within earshot of Remlinger Farm since 1959. My property is 2350 linear feet from the stage that was utilized last June for the unpermitted concert at Remlinger. That concert was the first of its size and acoustic volume ever. The amplified sound was much louder than any other events at Remlinger. This was a rock concert that lasted for three days. During the show, I could hear the lyrics inside my home with the doors and windows closed. So this is not existing vested use, it is a change of use and should have to through conditional use permit process.

The noise ordinance requires sound exceeding the property line to be under 52 decibels, which is comparable to moderate rainfall. An outdoor rock concert has noise level of at least 110 decibels – over 85 decibels can cause permanent hearing loss. There is no way this venue can meet the noise ordinance with use of an amplifier. This June concert projected sound, exceeding this noise ordinance many miles up the valley.

Secondly, Remlinger has begun clearing and grading without any permits for new work on Parcel 212507-9021. There is an active enforcement action on Parcel 222507-9012 that includes construction of a permanent stage without a permit in the shoreline conservancy zone, which conflicts with the Department of Ecology. What is King County doing about this?

It has been DLS’s process to not allow new permits until enforcement cases have been resolved. Why is this not happening in this case?

Thank you for your time and consideration,

Steve Foster

Carnation, WA

From: [Compplan](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: FW: Docket Submission
Date: Monday, March 4, 2024 4:33:44 PM
Attachments: [KCCP Docket 03 04 2024 Rural Transportation.docx](#)

Chris Jensen – [they/them](#)

Comprehensive Planning Manager

King County Executive Department | Office of Performance, Strategy, and Budget

[Sign up](#) for email updates about the 2024 King County Comprehensive Plan Update.

From: VenLin Joseph Chan <venlinjosephchan@yahoo.com>

Sent: Monday, March 4, 2024 2:35 PM

To: Compplan <compplan@kingcounty.gov>

Subject: Docket Submission

[EXTERNAL Email Notice!] External communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

From: [Camp, Cherie](#) on behalf of [Clerk, King County Council](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: FW: Public Comment for 2/27/2024 KC Council Mtg
Date: Tuesday, February 27, 2024 12:32:26 PM
Attachments: [20240227-Public Comment for KC Council Mtg.pdf](#)

From: jules <jules.hughes@usa.net>
Sent: Monday, February 26, 2024 9:59 PM
To: Clerk, King County Council <Clerk@kingcounty.gov>
Subject: Public Comment for 2/27/2024 KC Council Mtg

Dear King County Clerk,

Please find attached my public comment for tomorrow's 1:30pm Council meeting.

If I want to read my comment remotely, do I raise my hand or sign up per instructions after I've joined by Zoom with the Webinar ID? I just don't recall at what point we sign up to speak.

Thank you,
Jules

Jules Hughes

P. O. Box 815

Carnation, Washington 98014

jules.hughes@usa.net

There are three ways to provide public testimony:

1. In person: You may attend the meeting in person in Council Chambers.
2. By email: You may testify by submitting a COMMENT email. If your testimony is submitted before 10:00 a.m. on the day of the Council meeting, your email testimony will be distributed to the Councilmembers and appropriate staff prior to the meeting. Please submit your testimony by emailing clerk@kingcounty.gov.
3. Remote attendance on the Zoom Webinar: You may provide oral public testimony at the meeting by connecting to the meeting via phone or computer using the ZOOM application at <https://zoom.us/>, and entering the Webinar ID below. You are not required to sign-up in advance. Testimony will be limited to ordinances and motions listed on the meeting agenda for action. On the fourth Tuesday of each month, the council allows general public comment on matters relating to county government.

CONNECTING TO THE WEBINAR
Webinar ID: 890 5838 1493

From: [William H](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: Kingcounty proposed density rezoning map
Date: Wednesday, February 28, 2024 4:57:10 PM

If its already out
Please send info

From: [Connie Olberg](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: Land use & property taxes
Date: Wednesday, February 28, 2024 2:49:51 PM

Taxes: I am a senior citizen with 3 properties in King County. The excessive taxing of property owners in King County, hard workers, that saved and invested to purchase property, you are holding responsible for supporting homelessness and drug abuse. We should NOT be the ones held accountable for caring for these individuals, particularly handing out gift cards that only help the drug dealers to take them in exchange for drugs, pennies on the dollar. I support working the root of the problem and helping those that want to get out of their predicament, not throwing band aids to those who want a handout. As a senior citizen, we can't afford a 12% property tax increase! I just declared Republican, the first time in 40 years.

Land use: Our family farm on a river received notification that you changed our property line, no public hearing, no notification prior to the change, and no compensation for taking part of our land. How can you do this? Is this legal? We paid for the property line we had when the land was purchased and were not compensated for the change. I am ok with changing it as long as it does not impact the value of my land and if it does, we should be adequately compensated. YOU STOLE OUR PROPERTY.
Again, voting republican! I also am going to work with the land owners where we own property right on the border of 2 counties to move out of King County. You are thieves. How do you answer these concerns?

Thanks!
Connie

From: [sue neuner](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: Landfill closure
Date: Friday, March 1, 2024 4:07:20 PM

Hey king county officials. Close the landfill. Get your. Act together and quit polluting south east king county . Also make cedar. Grove composting unable to pollute too. Air stinks And is disgusting. Make us vimit some days. We can't enjoy our property. And we have lived here. 40 years. And yes I call puget sound sir quality line. And file a complaint. But you know they don't have the manpower to enforce . Sue. Neuner.
Sent from my iPhone

From: chkellogg33@gmail.com
To: [Legislative Staff, Council CompPlan](#)
Subject: Lot sizes in Fall City
Date: Thursday, February 22, 2024 9:49:55 AM
Attachments: [CHK Letter to CouncilCompPlan 2-22-2024.docx](#)

Good morning,

Please enter the attached comment letter in the public record for the upcoming Comp Plan update.

Thank you,

Charlie

Charlie Kellogg
PO Box 1203
Fall City, WA 98024
(206) 818-6856
Chkellogg33@gmail.com

From: ming@beanadvice.com
To: [Legislative Staff, Council CompPlan](#)
Subject: RA 5 Zoning
Date: Monday, February 26, 2024 4:08:50 PM

Hi there

I am studying the 2024 Comprehensive Plan to understand what impact, especially around density, will be coming for a property with RA-5 zoning in Woodinville. I also did a parcel number search in the "Land use and Zoning Map Amendments" and did not see any changes impacting my parcel.

Could you help me understand if there is any potential code changes that would allow higher density for RA-5 zone, e.g. affordable housing. If I need to speak with someone else on this matter, I would appreciate a referral as well. Thanks!

Ming Fung, CPA | +1.206.973.0308 | www.BeanAdvice.com

From: [William H](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: Re: Automatic reply: Kingcounty proposed density rezoning map
Date: Wednesday, February 28, 2024 5:42:22 PM

Will any properties lose density zoning??

On Wed, Feb 28, 2024, 4:57 PM Legislative Staff, Council CompPlan
<CouncilCompPlan@kingcounty.gov> wrote:

Hello,

Thanks for reaching out to the King County Council and your interest in the County's 2024 Comprehensive Plan update. Your comments have been received and will be shared with all Councilmembers. If you have asked a question about the update process, a member of the Council's staff will reach out to you shortly. Other comments may not receive a response but will be given to Councilmembers for their consideration.

If you would like to be added to the Comprehensive Plan email list to stay up to date on planning news and project milestones, please click [here](#).

More information on the Council's review of the 2024 Comprehensive Plan can be found at <https://kingcounty.gov/en/dept/council/governance-leadership/county-council/topics-of-interest/comprehensive-plan/2024>.

Thank you!

Council staff

Request language assistance in አማርኛ, العربية, 简体中文, 繁體中文, 한국어, Русский, Soomaali, Español, Tagalog, Українська, or Tiếng Việt by calling (206) 477-9259 or emailing tera.chea2@kingcounty.gov.

Request language assistance in Amharic, Arabic, Chinese, Korean, Russian, Somali, Spanish, Tagalog, Ukrainian, or Vietnamese by calling (206) 477-9259 or emailing tera.chea2@kingcounty.gov.

From: [Demian](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: Thank You for the Additional Changes
Date: Friday, March 1, 2024 3:51:23 PM

Hi:

Thanks to all who did the studies that informed these excellent ideas and practical plans.

Demian

--

Dr. Demian
206-935-1206
demian@buddybuddy.com
Sweet Corn Productions
sweetcornmedia.com

Comp Plan comments March 7, 2024

Good evening. I am Cindy Parks and I've lived in Fall city for 40 years.

I support Angela Donaldson's comments regarding density, lots size and setback. The current language in the proposed subarea plan and the recommendations the subarea stewards are proposing aligns with the community's desire to allow development but have that development be consistent with Fall City character.

As the Council members know, Fall City has limited public resources. This requires us to have a strong community commitment to volunteering and connection with each other. We strongly value organizations like Fall City Community Association, Fall City Historical Society and Fall City Sustainable Growth to bridge those resource gaps.

I have printed out a few photos I will share with you showing average homes in Fall City, an ariel of Fall City with the new built development, examples of cars on shoulder and in street of the new development and a photo of additional developments coming to Fall City - with up to 24 homes each.

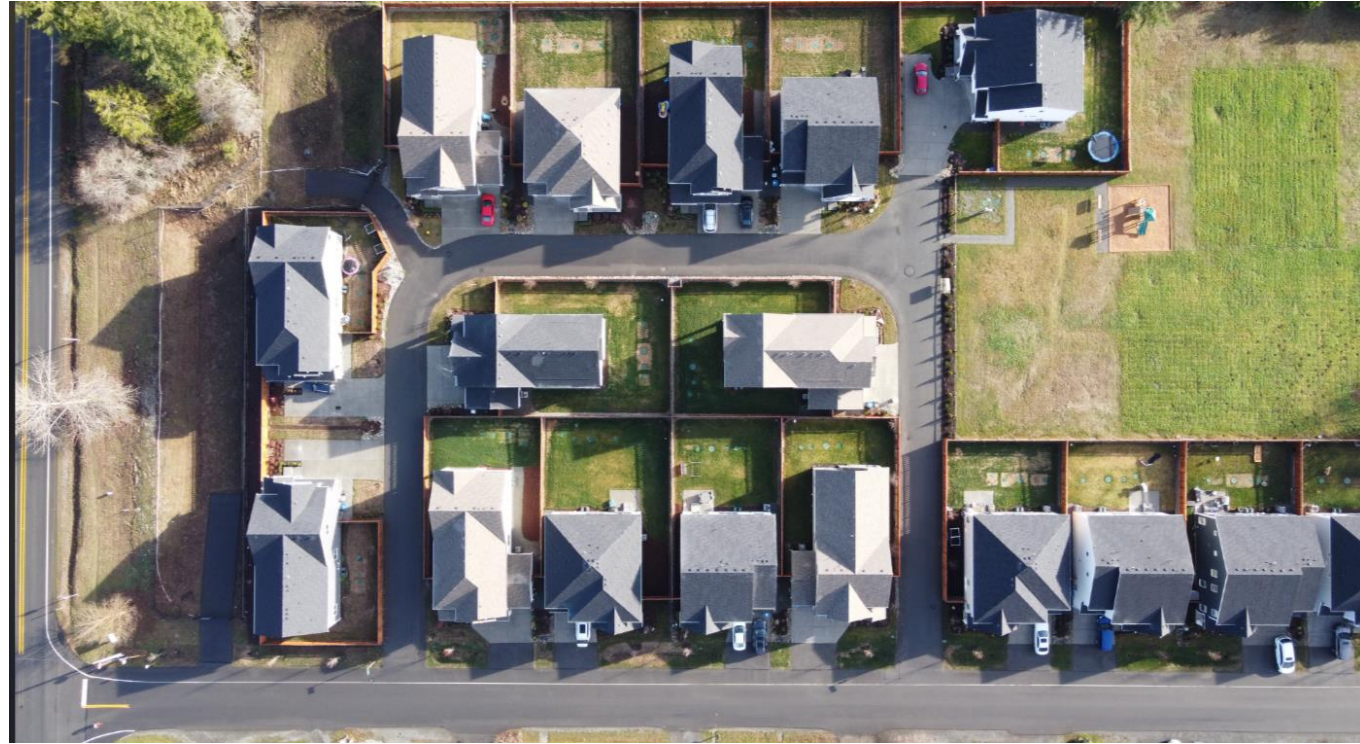
We want to see sustainable building practices in Fall City. We advocate for current and future generations by protecting drinking water and the health of the environment, ensuring adopted policies and community plans are honored, and advocating for our unique rural identity.

Thank you for your careful consideration of the updating of the Comprehensive Plan that will guide us for years.

-Cindy Parks 2727 303rd Ave SE Fall City, WA



Proposed developments for Fall City.
Up to 24 homes per development.



Current view of one development that
has been built in Fall City.

Very little setback from road or from
each house.



Current development that has been built with very little set back. Notice the No Parking signs with vehicles parked on the shoulder. The streets are narrow with no center line striping.





Overview showing new development. There are no trees left on that property. Notice the surrounding homes and area with trees.



From: [Fred Schapelhouman](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: 2024 KingCo Comprehensive Plan Update
Date: Thursday, March 7, 2024 5:26:39 PM

Hi,

- 1) Is there a draft of the proposed Plan Update that can be reviewed by the public?
- 2) Is there a map showing proposed changes in land use and zoning resulting from this Plan update?

Thank you,

--

/Fred
Fred Schapelhouman

From: [TERESA KLUVER](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: Comments
Date: Thursday, March 7, 2024 6:00:03 PM

Hello,

Thank you for the opportunity to provide public comments on the proposed Comprehensive Plan and associated SubArea Plans electronically. I was not able to attend an in person meeting.

I encourage the proposed Snoqualmie Valley/Northeast King County Subarea Plan to be changed to reflect the desires of the Fall City Community as submitted by the Sub area stewards who thoroughly researched, surveyed, and documented their findings. These changes would include:

- Increasing the designation of minimum building setbacks to: Street - 30ft; Interior - 10ft; and Back - 20ft.
- Use a Net Density of 4 dwelling units/acre. This aligns with the Fall City Residential Analysis study completed by consultants for King County and assures a building to lot ratio that blends in with the existing character of the Fall City community.
- Designation of a minimum lot size of 10,000 sq. ft.

These changes should help to limit clustering, keep houses in scale with lot size, and allow for new developments that more closely match neighboring homes.

Teresa Kluver
32803 SE 44th Street; Fall City
425-443-1115

David Beecher



King County

Update on Best Available Science and Critical Areas Ordinance Review 2024 King County Comprehensive Plan December 2023

As part of the 2024 King County Comprehensive Plan update, the County is required to review its policies and Critical Areas Ordinance (CAO) to include the current Best Available Science (BAS) and reflect changes in state law. The updated Comprehensive Plan and CAO must be adopted by December 2024. This document reports on BAS background, approach to review, progress to date, initial BAS findings and recommendations, and next actions. A final BAS report will be transmitted to the Council on March 1, 2024, along with BAS-based proposed policy and code amendments to be incorporated into the 2024 Comprehensive Plan Update that was transmitted to the Council in December 2023 concurrent with this report.

Background

The Growth Management Act (GMA) requires that counties and cities protect the functions and values of critical areas, including wetlands, critical aquifer recharge areas (CARAs), frequently flooded areas, geologically hazardous areas, and fish and wildlife habitat conservation areas (FWHCAs). "Protection" in the context of critical areas refers to both preservation of the functions and values of the natural environment and to safeguarding the public from hazards to health and safety (WAC 365-196-830). Examples of functions and values of wetlands include preventing downstream flooding, filtering pollutants, and supporting stream flows in summer.

CAOs must be developed using BAS and give special consideration to conserve or protect anadromous¹ fisheries, such as salmon. Where proposed policies and regulations depart from BAS, the jurisdiction must provide the rationale, including legal, social, cultural, economic, and political information, and identify potential risks associated with the departure (WAC 365-195).

King County developed BAS to support the development and adoption of the County's first CAO in 2004. Since then, the state has conducted robust review and update of BAS for wetlands and riparian areas. Additionally, the state has added a standard of "no net loss" to protection of functions and values of critical areas at the ecosystem scale (WAC 365-196-830). While the WAC acknowledges that jurisdictions may allow localized impacts to critical area functions and values, development regulations must preserve the existing functions and values of critical areas. Avoidance is the most effective way to protect critical areas. If development regulations allow harm to critical areas, they must require compensatory mitigation of the harm.

¹ Anadromous refers to fish or fish species that spend portions of its life cycle in both fresh and salt waters, entering fresh water from the sea to spawn.

Local governments may develop and implement alternative means of protecting critical areas from some activities using best management practices or a combination of regulatory and nonregulatory programs. King County uses a combination of regulatory and non-regulatory tools (e.g., open space conservation, habitat restoration, tax incentives, technical assistance) to protect critical areas functions and values.

BAS Review

Reviewing BAS and developing policy and code updates is a significant body of work. The Executive requested and the Council approved additional resources for staff and consulting to support BAS review and code updates as part of the 2023-2024 King County Biennial Budget. The state issued updated guidance for BAS review in December 2022. The County accelerated hiring for a project manager and code writer, and BAS review was fully underway by March 2023.

King County’s 2024 BAS review was designed to expand on its 2004 BAS review.² It aims to ensure compliance with current GMA requirements and administrative guidance, with a heightened emphasis on achieving no net loss of critical area functions and values. Additionally, it seeks to incorporate significant state agency updates to BAS for riparian areas and wetlands while bolstering local management and protection of critical areas. King County relied on the Washington State Department of Commerce Critical Areas Handbook and Checklist for Critical Areas as the primary guidance to scope 2024 BAS review for each critical area. King County coordinated with state agencies to inform BAS review and evaluate considered regulatory changes.

The following table provides a high-level summary of the County’s BAS findings, existing CAO regulations, and how the Executive is considering updating the CAO to be consistent with new requirements of state law, including the mandate that counties ensure no net loss of critical areas functions and values at the ecosystem scale. Additional information on BAS findings and policy considerations is found in the “Considered Regulatory Updates” section below. A more detailed summary of code changes under consideration for aquatic areas and wetlands can be found in Appendix A.

Critical Area	Topic	Best Available Science	Current King County Code	Considered Change*
Riparian Areas (Formerly Aquatic Area Buffers)	Level of Protection (Width)	Riparian areas ranging from 180 ft** - 235 ft for all water types.	Shoreline: 165 ft (115 ft in UGA***) Fish Bearing: 165 ft (115 ft in UGA) Non-fish-bearing: 65 ft Other: 25 ft	Increase riparian area widths to strengthen protection while accounting for other GMA goals.
	Channel Migration Zone (CMZ) Areas	Riparian area measured from edge of CMZ or floodplain, whichever is greater.	Riparian areas are measured from channel’s edge. Extended where severe CMZ is greater than riparian area width.	Update methodology for measuring riparian areas where CMZs are mapped.
	Mitigation Ratios	3:1 on-site 12:1 off-site No allowances	1:1 on-site 3:1 or 2:1 off-site Some allowances for flexibility.	Increase on- and off-site compensatory mitigation ratios.
Wetlands	Level of Protection (Width)	Matrixed by wetland category and land use intensity. 50 ft to 300 ft range	Matrixed by wetland category and land use intensity. 25 ft to 300 ft range Several allowances.	Increase buffer widths for some wetlands. Update and clarify allowances.

² King County 2004 *Volume I: Review of Scientific Literature* and *Volume II: Assessment of Proposed Ordinances*

Critical Area	Topic	Best Available Science	Current King County Code	Considered Change*
		No or limited allowances.		
	Enhancement-based Mitigation Ratios	Matrixed by wetland category. Range 2:1 to 16:1	Matrixed by wetland category. Range 2:1 to 10:1	Increase mitigation ratios for one type of mitigation: enhancement-based mitigation.
Geologically Hazardous Areas	Alluvial Fan Development Standards	Manage alluvial fans, debris flow areas to reduce risk to public health and safety and protect habitat.	Current regulations to reduce public health and safety risk are limited.	Establish alluvial fan development standards.
	Tsunami Hazard Area Development Standards	Designate and establish development standards for tsunami hazard areas.	Tsunami hazard areas not explicitly regulated.	Establish tsunami hazard area development standards.
Livestock and Commercial Agriculture	Farm Field Access Drives	Require permit and compliance with standard riparian area, wetland buffer widths.	Permits not required for farm field access drives and critical area impacts are unmitigated.	Maintain flexibility while updating and clarifying farm field access drive requirements to limit critical area impacts.
	Livestock Management Ordinance	Require compliance with standard riparian area, wetland buffer widths.	Allowances allow riparian area and wetland buffers to be reduced to 0 ft to 25 ft.	Maintain flexibility while adjusting allowances dependent on water type or wetland category for greater protection of water quality.

* See more details in Appendix A

** ft = feet

*** UGA = Urban Growth Area

Tribal Consultation

Government to government consultation with Indian tribes has been initiated with the Suquamish Tribe, Muckleshoot Indian Tribe, Tulalip Tribes, Snoqualmie Tribe, and Puyallup Tribe, and is ongoing. Consultation will inform the final proposed code and policy updates being transmitted on March 1, 2024.

Engagement with Community Partners

King County engaged County advisory committees, community partners, and development community interests in fall of 2023 to review BAS findings and regulatory changes under consideration and to collect input on considered changes. This engagement included the following groups and organizations: Joint Rural Area Team; CARE/SWAN; Skyway Coalition; Homestead Community Land Trust; Community Land Conservancy; White Center Community Development Association; Watershed Salmon Recovery Forums; King Conservation District; King County Agriculture Commission; Fish, Farm, Flood Implementation Oversight Committee; Master Builders Association of King and Snohomish Counties; Seattle King County Realtors Association; Futurewise; and Puget Soundkeeper Alliance.

Themes shared with the County during this early input included:

- Support for using a combination of regulatory and non-regulatory measures to protect critical areas functions and values and achieve no net loss at an ecosystem scale.
- Request that the County affirm its commitment for policies and regulations to support ongoing agricultural operations and that changes would only apply to newly permitted development and land use activities.
- Importance of proactive and consistent code enforcement.
- Recommendation for investment in outreach and education about the value of wetlands, riparian areas, and other critical areas, King County regulations that protect them, and incentives (e.g., tax incentives) for property owners to protect habitat and water quality.
- Concern that increasing base regulatory requirements for protection of critical areas will make it more difficult to qualify for voluntary incentive programs, such as the Public Benefit Rating System.
- Concern about impacts to housing development in the urban area, especially affordable housing in the Skyway community. Interest in updates to critical areas regulations that are more supportive of community stewardship and restoration projects.
- Range of viewpoints about riparian area widths necessary to ensure no-net loss; concern about urban riparian area widths under consideration potentially being insufficient to protect the water quality of streams and Puget Sound; concern about riparian area and wetland buffer widths placing disproportionate regulatory burden on lower income homeowners in urban unincorporated King County.
- Interest in further measures to protect groundwater flows that help to keep water temperatures cool.

Conversations with these partners are ongoing and will continue to inform further development of the code update proposal. Opportunity for general public input will also occur as noted in the Next Actions section below.

Considered Regulatory Updates

The County must decide how to update Comprehensive Plan policies and development regulations to adequately protect critical areas and public health and safety while meeting GMA and Comprehensive Plan goals for equity, affordable housing, and agriculture. The County is carefully reviewing the impacts of considered changes as it seeks to balance multiple, sometimes competing goals.

Considered regulatory updates may affect how a property in unincorporated King County can be used or developed if there are one or more critical areas, such as a stream or wetland, on or adjacent to the property. This would affect new development and substantial changes to existing development. In those cases, this might result in needing to take additional actions, such as conducting a critical area study to identify potential impacts and mitigation measures or changing the location or size of the building footprint.

Based on BAS findings, tribal consultations, and early engagement with key partners the following is a summary of considered changes to County policies and development regulations; see more details in Appendix A. Companion non-regulatory actions are also discussed.

- Wetlands:** King County is considering measured increases to some wetland buffers for some categories of wetlands. The width of a wetland buffer is determined by wetland category and the proposed intensity of adjacent land use. Considered updates to the values in King County's wetland buffer table (King County Code (K.C.C.) 21A.24.325) can be found in Appendix A. Considered updates to buffer widths are informed by state BAS and driven by the need to improve protections for wetland functions and values (e.g., water quality, flood water storage, wildlife habitat) in a changing climate. Considered updates to wetland mitigation requirements (K.C.C. 21A.23.340) can be found in Appendix A. Mitigation provides a pathway to compensate for unavoidable impacts to critical areas. In addition to wetland buffer and mitigation ratio changes, King County is considering other regulatory updates and implementing non-regulatory programming to protect wetland functions and values. This includes a significant investment in updating the County's wetland mapping, which will replace dated mapping and provide more accurate wetland location information to the public, permit applicants, and permit review staff.
- Riparian Areas:** King County is considering increasing the size of riparian areas (formerly aquatic area buffers). The width of a riparian area is determined by the type of adjacent aquatic area (e.g., lake or fish-bearing stream) and whether the aquatic area is located in or outside of the Urban Growth Area (UGA). Considered updates to riparian area widths (K.C.C. 21A.24.358) can be found in a summary table in Appendix A. Considered updates are informed by state BAS and driven by the need to improve protections for riparian area functions and values (e.g., water quality, fish and wildlife habitat, bank stability) in a changing climate. Considered updates include a BAS departure for the width of riparian areas adjacent to N- and O-type aquatic areas. Considered updates also maintain the County precedent of limiting riparian area protections in the UGA to prioritize urban housing development and economic growth. Staff analysis demonstrates that considered changes in riparian area widths will have limited impact on capacity for housing development in the urban unincorporated area. In addition to riparian area widths, King County is considering other regulatory updates such as changes to riparian area mitigation ratios. King County is also implementing non-regulatory programming to support protection of riparian area functions and values and demonstrate special consideration for anadromous fisheries. This includes updates to County stream mapping, which will replace dated mapping and provide more accurate information to the public, permit applicants, and permit review staff about the location of different aquatic areas.
- Geologically Hazardous Areas:** King County is considering updates to development regulations that reduce public health and safety risks associated with geologically hazardous areas (GHAs). Specifically, King County is considering implementing development regulations for the management of alluvial fans. Alluvial fans are a type of landslide hazard area that occur along some stream channels. Hazardous geologic processes occur on alluvial fans (e.g., debris flows, debris floods, flash flooding) that can create significant risks to critical infrastructure and public health and safety. Considered development standards for alluvial fans are informed by these risks, BAS, and development regulations in place at other jurisdictions in the region. King County is also considering implementing development regulations for Tsunami Hazard Areas. King County is reviewing regulations in place at other regional jurisdictions, as well as local

shoreline and flood hazard regulations, to inform considered Tsunami Hazard Area development regulations.

- **Regulatory Allowances for Livestock and Commercial Agriculture:** King County is considering updates to regulatory allowances that allow agricultural land uses to impact critical areas such as wetlands, riparian areas, and aquatic areas. Updates to regulatory allowances are informed by BAS and are necessary to limit impacts to critical area functions and values. Considered updates are also informed by the County's continued commitment to support a local, economically viable agricultural industry.
- **Streamlined Permitting for Habitat Restoration:** King County is considering regulatory updates that would streamline permitting processes for habitat restoration and fish passage projects. Considered updates would allow restoration efforts to occur more quickly, restoring critical area functions that support wildlife and anadromous fish species, such as salmon.

Next actions

This report provided background and a status report on the BAS review, summary of significant changes in state law and state-recommended BAS requirements, tribal consultation, community engagement, and further code and policy amendments under consideration. Next actions include:

- Issuance of a State Environmental Policy Act Draft Environmental Impact Statement (EIS) in December 2023;
- Further refinement of CAO amendments informed by BAS review, GMA goals, partner input, public comments on the Draft EIS, and continued Indian tribal consultation;
- Finalization of BAS report, including identification of departures from BAS, description of rationale, risk assessment to critical areas functions and values, and identification of regulatory and non-regulatory actions to mitigate risks;
- Review by state and federal agencies for compliance with applicable state and federal laws;
- Submittal of additional BAS review-driven policy and code amendments by March 1, 2024, as a supplement to the 2024 Comprehensive Plan Package being transmitted in December 2023;
- Issuance of a final EIS in Fall 2024;
- Consideration of further BAS-driven policy and code amendments by Council in conjunction with the 2024 Comprehensive Plan package, with adoption required by state law by December 2024; and
- Opportunities for public review and input throughout 2024.

Separate from the BAS and CAO body of work but related to implementation of any adopted CAO changes, the 2023-2024 Biennial budget directs the County to review code enforcement regulations in King County Code Title 23 and related development regulations.³ A report on that review, as well as legislation that would implement any recommendations in the report, will be transmitted to the Council in late 2024.

³ Ordinance 19633, Section 67, Provision P1, as amended

Appendix A

The following tables provide more details about considered changes to current K.C.C. standards. Considered deletions are shown in ~~strike through~~ and considered additions are shown in underline.

Land Grab 2.0

Considered Changes to Wetland Buffer Widths

Wetland Category and Characteristics	Intensity of Impact of Adjacent Land Use		
	High Impact	Moderate Impact	Low Impact
Category I			
Wetlands of High Conservation Value	250-ft 300 ft*	490-ft <u>225 ft</u>	425-ft <u>150 ft</u>
Bog	250-ft <u>300 ft</u>	490-ft <u>225 ft</u>	425-ft <u>150 ft</u>
Estuarine	200-ft <u>300 ft</u>	450-ft <u>225 ft</u>	400-ft <u>150 ft</u>
Coastal Lagoon	200-ft <u>300 ft</u>	450-ft <u>225 ft</u>	400-ft <u>150 ft</u>
Forested	Buffer width to be based on score for habitat functions or water quality functions		
Habitat score from 8 to 9 points (high level of function)	300 ft	225 ft	150 ft
Habitat score from 6 to 7 points (moderate level of function)	150 ft	110 ft	75 ft
Category I wetlands not meeting any of the criteria above	100 ft	75 ft	50 ft
Category II			
Estuarine	150 ft	110 ft	75 ft
Habitat score from 8 to 9 points (high level of function)	300 ft	225 ft	150 ft
Habitat score from 6 to 7 points (moderate level of function)	150 ft	110 ft	75 ft
Category II wetlands not meeting any of the criteria above	100 ft	75 ft	50 ft
Category III			
Habitat score from 8 to 9 points (high level of function)	300 ft	225 ft	150 ft
Habitat score from 6 to 7 points (moderate level of function)	150 ft	110 ft	75 ft

Wetland Category and Characteristics	Intensity of Impact of Adjacent Land Use		
	High Impact	Moderate Impact	Low Impact
Category III wetlands not meeting any of the criteria above	80 ft	60 ft	40 ft
Category IV	50-ft <u>60 ft</u>	40-ft <u>45 ft</u>	25-ft <u>35 ft</u>

*ft = feet

Considered Changes to Wetland Mitigation Ratios

Category and type of wetland	Wetland reestablishment or creation	Wetland rehabilitation	1:1 wetland reestablishment or wetland creation (R/C) and wetland enhancement (E)	Wetland enhancement only
Category IV	1.5:1	3:1	1:1 R/C and 2:1 E	6:1
Category III	2:1	4:1	1:1 R/C and 2:1 E <u>4:1 E</u>	8:1
Category II estuarine	Case-by-case	4:1 rehabilitation of an estuarine wetland	Case-by-case	Case-by-case
All other Category II	3:1	8:1 <u>6:1</u>	1:1 R/C and 4:1 E <u>8:1 E</u>	12:1
Category I forested	6:1	12:1	1:1 R/C and 10:1 E <u>16:1 E</u>	Case-by-case
All other Category I	4:1	8:1	1:1 R/C and 6:1 E <u>12:1 E</u>	Case-by-case
Category I wetlands of high conservation value	Not allowed	6:1 rehabilitation of a wetland of high conservation value	Case-by-case	Case-by-case
Category I coastal lagoon	Not allowed	6:1 rehabilitation of a coastal lagoon	Case-by-case	Case-by-case
Category I bog	Not allowed	6:1 rehabilitation of a bog	Case-by-case	Case-by-case
Category I estuarine	Case-by-case	6:1 rehabilitation of an estuarine wetland	Case-by-case	Case-by-case

Considered Changes to Riparian Area Widths

Aquatic Area Type	Description	Riparian Area Width Inside the UGA*	Riparian Area Widths Outside the UGA
Shoreline (S)	Shorelines of the state.	445-ft <u>180 ft</u> **	465-ft <u>200 ft</u>
Fish (F)	Not S type; contain fish or fish habitat.	445-ft <u>180 ft</u>	465-ft <u>200 ft</u>
Non-fish-bearing (N)	Not S or F type; connected by surface water to S or F.	65 ft***	65 ft***
Other (O)	Not S, F, or N type.	25-ft <u>50 ft</u>	25-ft <u>50 ft</u>

* UGA = Urban Growth Area

** ft = feet

*** Still under review; considered changes to be determined

Erosion Hazards

Metadata also available as - [[Outline](#)]

David Beecher

Frequently-anticipated questions:

- What does this data set describe?
 1. How should this data set be cited?
 2. What geographic area does the data set cover?
 3. What does it look like?
 4. Does the data set describe conditions during a particular time period?
 5. What is the general form of this data set?
 6. How does the data set represent geographic features?
 7. How does the data set describe geographic features?
- Who produced the data set?
 1. Who are the originators of the data set?
 2. Who also contributed to the data set?
 3. To whom should users address questions about the data?
- Why was the data set created?
- How was the data set created?
 1. From what previous works were the data drawn?
 2. How were the data generated, processed, and modified?
 3. What similar or related data should the user be aware of?
- How reliable are the data; what problems remain in the data set?
 1. How well have the observations been checked?
 2. How accurate are the geographic locations?
 3. How accurate are the heights or depths?
 4. Where are the gaps in the data? What is missing?
 5. How consistent are the relationships among the data, including topology?
- How can someone get a copy of the data set?
 1. Are there legal restrictions on access or use of the data?
 2. Who distributes the data?
 3. What's the catalog number I need to order this data set?
 4. What legal disclaimers am I supposed to read?
 5. How can I download or order the data?
- Who wrote the metadata?

What does this data set describe?

Title: Erosion Hazards

Abstract:

The Sensitive Areas Ordinance (SAO) defines significant erosion hazard areas as those soils in King County that may experience severe to very severe erosion hazard. The SAO adopts the soils definition in the U.S. Department of Agriculture Soil Conservation Service (SCS) 1973 King County Soil Survey and the current draft of the Snoqualmie Pass Area Soil Survey (ND).

Supplemental Information:

Erosion is a natural process of wearing away of land surfaces by falling and running water, wind and glacier scour. Of these geologic forces, erosion by running water is by far the most important within the Puget Sound Basin. The susceptibility of any soil type to erosion depends upon the physical and chemical characteristics of the soil, in addition to its protective vegetative cover, topographic position (slope length and gradient), the intensity of rainfall, and the velocity of runoff water. Whereas erosion is the wearing away of material, sedimentation or deposition is the accumulation of eroded matter where water carrying sediment is slowed. The effects of sedimentation are most pronounced where streams enter Puget Sound and in lowland lakes, ponds, wetland, and stream channels. The natural geologic processes of erosion and sedimentation are frequently accelerated by land use modifications and urban development. The erosion hazard maps show areas of King County where soils are particularly susceptible to increased erosion as a result of development. The regulations in the Sensitive Areas Ordinance for erosion hazards pertain to timing and methods of clearing for development. In general, clearing is restricted to the period between April 1 and November 1. There are two exceptions: 1) clearing of up to 15,000 square feet on individual lots, and 2) timber harvest pursuant to an approved forest practice permit. Clearing for roads and utilities shall occur first with subsequent clearing on individual lots permitted after approval of the associated building permit. A vegetation management plan is required for clearing on individual lots. An erosion control plan is required for all development proposals within erosion hazard areas. Please refer to the Sensitive Areas Ordinance and administrative rules for more details on the regulations.

1. How should this data set be cited?

County, King, 19970224, Erosion Hazards: King County, King County, WA.

Online Links:

- <http://www5.kingcounty.gov/gisdataportal/Default.aspx>

Other_Citation_Details: None

2. What geographic area does the data set cover?

West_Bounding_Coordinate: -122.542250

East_Bounding_Coordinate: -121.671459

North_Bounding_Coordinate: 47.784983

South_Bounding_Coordinate: 47.131445

3. What does it look like?

<<http://www5.kingcounty.gov/sdc/DataImages/erode.jpg>> (JPG)
 JPG File of layer overlain on base of WA counties or local cities

4. Does the data set describe conditions during a particular time period?

Calendar_Date: 01-Jan-1990
 Currentness_Reference: publication date

5. What is the general form of this data set?

Geospatial_Data_Presentation_Form: vector digital data

6. How does the data set represent geographic features?

a. How are geographic features stored in the data set?

This is a Vector data set. It contains the following vector data types (SDTS terminology):

- GT-polygon composed of chains (0)

b. What coordinate system is used to represent geographic features?

The map projection used is NAD 1983 HARN StatePlane Washington North FIPS 4601 Feet.

Projection parameters:

Standard_Parallel: 47.5
 Standard_Parallel: 48.73333333333333
 Longitude_of_Central_Meridian: -120.83333333333333
 Latitude_of_Projection_Origin: 47.0
 False_Easting: 1640416.6666666667
 False_Northing: 0.0

Planar coordinates are encoded using coordinate pair
 Abscissae (x-coordinates) are specified to the nearest 0.00025
 Ordinates (y-coordinates) are specified to the nearest 0.00025
 Planar coordinates are specified in foot_us

The horizontal datum used is D North American 1983 HARN.
 The ellipsoid used is GRS 1980.
 The semi-major axis of the ellipsoid used is 6378137.0.
 The flattening of the ellipsoid used is 1/298.257222101.

7. How does the data set describe geographic features?

PLIBRARY.ENVIRO.xxxx246438
 (Source: ESRI)

Shape
 Feature Geometry (Source: ESRI)
 Coordinates defining the features

HAZARD
 hazard type (Source: DDES)

Value	Definition
ERS	erosion

EDIT_DATE
 editi date (Source: DDES)

OBJECTID
 Internal feature number. (Source: ESRI)
 Sequential unique whole numbers that are automatically generated.

Shape.area
 area (Source: ESRI)

Shape.len
 length (Source: ESRI)

Who produced the data set?

1. Who are the originators of the data set? (may include formal authors, digital compilers, and editors)

- King County

2. **Who also contributed to the data set?**

3. **To whom should users address questions about the data?**

Permitting GIS Program Manager
 c/o King County GIS Center
 GIS Data Team Lead
 900 Oakesdale Ave SW
 Renton, WA 98055-1219
 US

206-263-4867 (voice)

Why was the data set created?

Defines significant erosion hazards for unincorporated areas of King County per the County Sensitive Areas Ordinance

How was the data set created?

1. **From what previous works were the data drawn?**

2. **How were the data generated, processed, and modified?**

Date: 01-Jan-1990 (process 1 of 3)

The layer was mapped for the 1990 Sensitive Areas Folio.

Person who carried out this activity:

KCGIS
 c/o Dennis Higgins
 Client Services Manager

Date: 01-Jan-1993 (process 2 of 3)

Converted to GIS by Lisa Vicknair in late 1992/ early 1993.

Person who carried out this activity:

KCGIS
 c/o Dennis Higgins
 Client Services Manager

Date: 19-Sep-2005 (process 3 of 3)

Convert from shapefile - G:\AV_DEV\SHAPFILS\SAO\poly\erosion to SDE feature class

Person who carried out this activity:

DDES
 c/o Holly Orr

3. **What similar or related data should the user be aware of?**

How reliable are the data; what problems remain in the data set?

1. **How well have the observations been checked?**

2. **How accurate are the geographic locations?**

3. **How accurate are the heights or depths?**

4. **Where are the gaps in the data? What is missing?**

5. **How consistent are the relationships among the observations, including topology?**

How can someone get a copy of the data set?

Are there legal restrictions on access or use of the data?

Access_Constraints: None

Use_Constraints:

King County data are made available with the understanding that they shall be used exclusively by the obtainer or his/her authorized agents. Digital products may not be reproduced or redistributed in any form or by any means without the express written authorization of King County.

1. Who distributes the data set? (Distributor 1 of 1)

KCGIS Center
c/o Cheryl Wilder
Data Sales Coordinator
201 S Jackson St, Suite 700
Seattle, WA 980914
US

206-296-7258 (voice)

2. What's the catalog number I need to order this data set?

/plibrary2/enviro/shapes/polygon/erode.shp

3. What legal disclaimers am I supposed to read?

King County disclaims any warranty of use of any digital product or data beyond that for which it was designed.

4. How can I download or order the data?

- **Availability in digital form:**

Data format: ESRI Shapefile

- **Cost to order the data:**

Contact KCGIS Client Services for the cost of reproduction - <http://www.kingcounty.gov/operations/GIS/GISData/GISDataDistribution.aspx>

Who wrote the metadata?**Dates:**

Last modified: 10-Jan-2013

Metadata author:

King County Dept. of Environmental Services
c/o Paul McCombs
GIS Data Team Lead
900 Oakesdale Ave SW
Renton, WA 98055-1219
US

206-296-7258 (voice)
firstname.lastname@kingcounty.gov

Metadata standard:

FGDC Content Standard for Digital Geospatial Metadata (FGDC-STD-001-1998)

Generated by mp version 2.8.24 on Mon Aug 21 17:12:51 2023

Sensitive Area Ordinance Streams

David Beecher

Metadata also available as - [\[Outline\]](#)

Frequently anticipated questions:

- What does this data set describe?
 1. How should this data set be cited?
 2. What geographic area does the data set cover?
 3. What does it look like?
 4. Does the data set describe conditions during a particular time period?
 5. What is the general form of this data set?
 6. How does the data set represent geographic features?
 7. How does the data set describe geographic features?
- Who produced the data set?
 1. Who are the originators of the data set?
 2. Who also contributed to the data set?
 3. To whom should users address questions about the data?
- Why was the data set created?
- How was the data set created?
 1. From what previous works were the data drawn?
 2. How were the data generated, processed, and modified?
 3. What similar or related data should the user be aware of?
- How reliable are the data; what problems remain in the data set?
 1. How well have the observations been checked?
 2. How accurate are the geographic locations?
 3. How accurate are the heights or depths?
 4. Where are the gaps in the data? What is missing?
 5. How consistent are the relationships among the data, including topology?
- How can someone get a copy of the data set?
 1. Are there legal restrictions on access or use of the data?
 2. Who distributes the data?
 3. What's the catalog number I need to order this data set?
 4. What legal disclaimers am I supposed to read?
 5. How can I download or order the data?
- Who wrote the metadata?

What does this data set describe?

Title: Sensitive Area Ordinance Streams

Abstract:

Streams are defined in the Sensitive Areas Ordinance (SAO) as those areas of King County where surface waters produce a defined channel or bed. A defined channel or bed is an area that demonstrates clear evidence of the passage of water and includes but is not limited to bedrock channels, gravel beds, sand and silt beds and defined-channel swales. The channel or bed need not contain water year-round. This definition is not meant to include irrigation ditches, canals, storm or surface water runoff devices or other entirely artificial watercourses unless they are used by salmonids or used to convey streams naturally occurring prior to construction in such watercourse.

Supplemental Information:

King County classifies streams into the following categories: Class 1 streams are those inventoried as "Shorelines of the State" under King County's Shoreline Master Program. Class 2 streams are those smaller than Class 1 streams that flow year-round during years of normal rainfall or those that are used by salmonids. Class 3 streams are those that are intermittent or ephemeral during years of normal rainfall and are not used by salmonids. Unclassified streams are those for which a water course has been identified but for which the defining characteristics of a Class 1, 2, or 3 stream have not been determined. Further study is necessary to classify these streams. The overall policy objective for stream management in King County is no net loss of stream functions and values. A detailed description of development standards for streams is given in the Sensitive Areas Ordinance and administrative rules. For exceptions, exemptions, and mitigation procedures for streams, please refer to the SAO and administrative rules. In general, the minimum required native vegetation buffer width for each stream class as measured from the ordinary high water mark is as follows: Class 1 Streams - 100-foot buffer Class 2 Streams used by salmonids - 50-foot buffer. A study may be required to determine salmonid use. Class 3 Streams - 25-foot buffer

1. How should this data set be cited?

County, King, 19980101, Sensitive Area Ordinance Streams: King County, King County, WA.

Online Links:

- None

Other Citation Details: None

2. What geographic area does the data set cover?

West Bounding Coordinate: -122.542282

East Bounding Coordinate: -121.671119

North Bounding Coordinate: 47.785043

South Bounding Coordinate: 47.130446

3. What does it look like?

<<http://www5.kingcounty.gov/sdc/DataImages/saostream.jpg>> (JPEG)
 JPG File of layer overlain on base of WA counties or local cities

4. Does the data set describe conditions during a particular time period?

Calendar_Date: 17-Oct-2002
 Currentness_Reference: publication date

5. What is the general form of this data set?

Geospatial_Data_Presentation_Form: vector digital data

6. How does the data set represent geographic features?

a. How are geographic features stored in the data set?

This is a Vector data set. It contains the following vector data types (SDTS terminology):

- String (0)

b. What coordinate system is used to represent geographic features?

The map projection used is NAD 1983 HARN StatePlane Washington North FIPS 4601 Feet.

Projection parameters:

Standard_Parallel: 47.5
 Standard_Parallel: 48.73333333333333
 Longitude_of_Central_Meridian: -120.83333333333333
 Latitude_of_Projection_Origin: 47.0
 False_Easting: 1640416.6666666667
 False_Northing: 0.0

Planar coordinates are encoded using coordinate pair
 Abscissae (x-coordinates) are specified to the nearest 0.00025
 Ordinates (y-coordinates) are specified to the nearest 0.00025
 Planar coordinates are specified in foot_us

The horizontal datum used is D North American 1983 HARN.
 The ellipsoid used is GRS 1980.
 The semi-major axis of the ellipsoid used is 6378137.0.
 The flattening of the ellipsoid used is 1/298.257222101.

7. How does the data set describe geographic features?

PLIBRARY.ENVIRO.xxxx246438

Line feature attribute table (Source: ESRI)

OBJECTID

Internal feature number. (Source: ESRI)

Sequential unique whole numbers that are automatically generated.

CLASS_

classifications of streams (Source: 1990 Sensitive Areas Map Folio)

Value	Definition
1	Shorelines of the State
2S	Smaller than Class 1 streams that flow year-round during years of normal rainfall or those that are used by salmonids. S = Salmon present
2P	Smaller than Class 1 streams that flow year-round during years of normal rainfall or those that are used by salmonids. P = Perennial stream but no salmon.
3	Intermittent or ephemeral during years of normal rainfall and are not used by salmonids.
Unclassified	A water course has been identified but for which the defining characteristics of a Class 1, 2, 3 stream have not been determined. Further study is necessary to classify these streams.

EDIT_DATE

edit date (Source: DDES)

SOURCE1

source (Source: DDES)

Shape

Feature geometry. (Source: ESRI)

Coordinates defining the features.

Shape.Length
length (Source: ESRI)

Who produced the data set?

1. **Who are the originators of the data set?** (may include formal authors, digital compilers, and editors)
 - o King County
2. **Who also contributed to the data set?**
3. **To whom should users address questions about the data?**

King County GIS Center
Attn: Paul McCombs
Permitting GIS Program Manager
900 Oakesdale Ave SW
Renton, WA 98055-1219
US

206-263-7258 (voice)

Why was the data set created?

To provide guidelines for development.

How was the data set created?

1. **From what previous works were the data drawn?**

KCCSMP (source 1 of 5)

Council, King County , 19810101, Shoreline Master Program.

Other_Citation_Details: Shoreline Master Program, K.C.C. 25.04

Type_of_Source_Media: None

Source_Contribution: Bibliography

KCDPW (source 2 of 5)

King County Dept. of Public Works, Surface Water Management Div. And Parks, Planning and Resources, Natural Resources and Parks Div, 19870101, Basin Reconnaissance Program Summary.

Type_of_Source_Media: None

Source_Contribution: Bibliography

WDF (source 3 of 5)

Washington Dept. of Fisheries, 19750101, A Catalog of Washington Streams and Salmon Utilization.

Other_Citation_Details: Volume I, Puget Sound

Type_of_Source_Media: None

Source_Contribution: Bibliography

KCSAO (source 4 of 5)

King County, WA, 19900101, Sensitive Areas Ordinance.

Other_Citation_Details:

. "Sensitive Areas Ordinance." Ordinance no. 9614, passed August 29, 1990

Type_of_Source_Media: None

Source_Contribution: Bibliography

WDNR (source 5 of 5)

Washington Dept of Natural Resources, 19790101, Official Water Type Maps.

Other_Citation_Details: updates to June 1990

Type_of_Source_Media: None

Source_Contribution: Bibliography

2. **How were the data generated, processed, and modified?**

(process 1 of 2)

Convert to SDE feature class from G:\AV_DEV\SHAPFILS\SAO\line\stream.shp

Person who carried out this activity:

DDES

Attn: Holly Orr

Date: 01-Jan-1990 (process 2 of 2)

Sensitive Areas Map Folio compiled. The 1987 edition and earlier editions of the Sensitive Areas Map Folio used the Washington Department of Natural Resources (DNR) Water Type Maps as a basis for stream categorization. The 1990 edition uses the new stream classification system (described above) defined by the Sensitive Areas Ordinance (SAO). The DNR system is based on the potential for fish habitat as well as water use characteristics, while the SAO system depends on the actual documented existence of salmonids in a stream or documented evidence of the perennial or intermittent nature of a stream. Both classification systems define Type I or Class 1 streams as Shorelines of the State. Although the DNR Type II-VI streams may coincide with SAO Class 2, 3, and Unclassified streams, the DNR system does not translate consistently to the SAO classification system. Because the SAO classification system requires a knowledge of the actual presence or absence of salmonids, additional research was necessary on streams that had previously been mapped and on streams added to the maps. Sources used for the 1990 maps were: 1) The State Shorelines Act maps and regulations were used to identify all Class 1 streams. 2) A Catalog of Washington Streams and Salmon Utilization, published in 1975 by the Washington Department of Fisheries, and personal interviews with WDOF field biologists in 1990 provided locations of anadromous fish bearing waters, included in Class 2 streams. 3) Data from the King County Water Management Basin Reconnaissance Program maps, field notes and basin plans published since the 1987 map folio edition were incorporated. 4) Washington Department of Natural Resources Water Type Maps were used to identify streams for which fish use has not been determined but channels have been identified. The Water Type maps are the primary source for identification of Unclassified streams east of the Forest Zone line. 5) Field work was conducted from April through July, 1990, primarily in the Snoqualmie River Basin, upper Green River, and portions of the Enumclaw Plateau, areas which had not been previously surveyed intensively. The fieldwork consisted of mapping stream channels, and determining, where possible, the presence of salmonids, and whether or not the stream was perennial.

Data sources used in this process:

- o KCSAO
- o WDF
- o KCCSMP
- o WDNR
- o KCDPW

3. What similar or related data should the user be aware of?

How reliable are the data; what problems remain in the data set?

1. How well have the observations been checked?
2. How accurate are the geographic locations?
3. How accurate are the heights or depths?
4. Where are the gaps in the data? What is missing?
5. How consistent are the relationships among the observations, including topology?

How can someone get a copy of the data set?

Are there legal restrictions on access or use of the data?

Access_Constraints: None

Use_Constraints:

King County data are made available with the understanding that they shall be used exclusively by the obtainer or his/her authorized agents. Digital products may not be reproduced or redistributed in any form or by any means without the express written authorization of King County. Because of seasonal variations in streamflow, the map folio does not represent a conclusive statement on stream classes. The majority of area have been field checked only once at a specific time of year. Weather conditions and stream flow affect the ability of field workers to locate fish. Research was also limited by environmental factors such as steep slopes and heavily vegetated areas that prevented access, and by restricted access to private property. This set of maps represents a compilation of the most thorough research on the location of and presence of salmonids in streams in King County as of 1990; however, some streams are not shown on these maps and many streams require further study to determine a final classification. Studies that are incomplete at this time, but will add to this information base, are the Washington Rivers Information System, on a Geographic Information System, managed by Washington Department of Wildlife and funded by Bonneville Power Administration; and a detailed survey of Newaukum Creek by Trout Unlimited.

1. Who distributes the data set? (Distributor 1 of 1)

KCGIS Center
Attn: Cheryl Wilder
Data Sales Coordinator
201 S Jackson St, Suite 700
Seattle, WA 980914
US

206-296-7258 (voice)

2. What's the catalog number I need to order this data set?

/plibrary2/enviro/shapes/arc/saostream.shp

3. What legal disclaimers am I supposed to read?

King County disclaims any warranty of use of any digital product or data beyond that for which it was designed.

4. How can I download or order the data?

◦ **Availability in digital form:**

Data format: ESRI Shapefile

◦ **Cost to order the data:**

Contact KCGIS Client Services for the cost of reproduction - <http://www.kingcounty.gov/operations/GIS/GISData/GISDataDistribution.aspx>

Who wrote the metadata?

Dates:

Last modified: 10-Jan-2013

Metadata author:

King County Dept. of Environmental Services
Attn: Paul McCombs
GIS Data Team Lead
900 Oakesdale Ave SW
Renton, WA 98055-1219
US

206-296-7258 (voice)
firstname.lastname@kingcounty.gov

Metadata standard:

FGDC Content Standard for Digital Geospatial Metadata (FGDC-STD-001-1998)

Generated by mp version 2.9.12 on Mon Aug 21 18:25:48 2023

Critical Aquifer Recharge Areas

David Beecher

Metadata also available as - [\[Outline\]](#)

Frequently anticipated questions:

- What does this data set describe?
 1. How should this data set be cited?
 2. What geographic area does the data set cover?
 3. What does it look like?
 4. Does the data set describe conditions during a particular time period?
 5. What is the general form of this data set?
 6. How does the data set represent geographic features?
 7. How does the data set describe geographic features?
- Who produced the data set?
 1. Who are the originators of the data set?
 2. Who also contributed to the data set?
 3. To whom should users address questions about the data?
- Why was the data set created?
- How was the data set created?
 1. From what previous works were the data drawn?
 2. How were the data generated, processed, and modified?
 3. What similar or related data should the user be aware of?
- How reliable are the data; what problems remain in the data set?
 1. How well have the observations been checked?
 2. How accurate are the geographic locations?
 3. How accurate are the heights or depths?
 4. Where are the gaps in the data? What is missing?
 5. How consistent are the relationships among the data, including topology?
- How can someone get a copy of the data set?
 1. Are there legal restrictions on access or use of the data?
 2. Who distributes the data?
 3. What's the catalog number I need to order this data set?
 4. What legal disclaimers am I supposed to read?
 5. How can I download or order the data?
- Who wrote the metadata?

What does this data set describe?

Title: Critical Aquifer Recharge Areas

Abstract: Critical Aquifer Recharge Areas

Supplemental Information:

Link to King County Critical Area home page: <http://www.kingcounty.gov/property/permits/codes/CAO.aspx> Link to the King County Critical Area Ordinance User's Manual for the CARA: <http://your.kingcounty.gov/ddes/cao/Manual/II-CARA.pdf> Link to King County Best Available Science paper for the CARA: <http://your.kingcounty.gov/ddes/cao/PDFs04ExecProp/BAS-Chap6-04.pdf> Washington State Department of Health Well Head Protection Area and Sole Source aquifer data can be downloaded: <http://ww4.doh.wa.gov/gis/gisdata.htm>

1. How should this data set be cited?

County, King, 20050404, Critical Aquifer Recharge Areas: King County, King County, WA.

Online Links:

- <http://www5.kingcounty.gov/gisdataportal/Default.aspx>

Other_Citation_Details: None

2. What geographic area does the data set cover?

West_Bounding_Coordinate: -122.541763

East_Bounding_Coordinate: -121.341360

North_Bounding_Coordinate: 47.781959

South_Bounding_Coordinate: 47.147729

3. What does it look like?

<http://www5.kingcounty.gov/sdc/DataImages/cara.jpg> (JPG)

JPG File of layer overlain on base of WA counties or local cities

4. Does the data set describe conditions during a particular time period?

Calendar_Date: 15-Oct-2008

Currentness_Reference: publication date

5. What is the general form of this data set?

Geospatial_Data_Presentation_Form: vector digital data

6. How does the data set represent geographic features?

a. How are geographic features stored in the data set?

This is a Vector data set. It contains the following vector data types (SDTS terminology):

- GT-polygon composed of chains (0)

b. What coordinate system is used to represent geographic features?

The map projection used is NAD 1983 HARN StatePlane Washington North FIPS 4601 Feet.

Projection parameters:

Standard_Parallel: 47.5
Standard_Parallel: 48.73333333333333
Longitude_of_Central_Meridian: -120.83333333333333
Latitude_of_Projection_Origin: 47.0
False_Easting: 1640416.6666666667
False_Northing: 0.0

Planar coordinates are encoded using coordinate pair
 Abscissae (x-coordinates) are specified to the nearest 0.00025
 Ordinates (y-coordinates) are specified to the nearest 0.00025
 Planar coordinates are specified in foot_us

The horizontal datum used is D North American 1983 HARN.
 The ellipsoid used is GRS 1980.
 The semi-major axis of the ellipsoid used is 6378137.0.
 The flattening of the ellipsoid used is 1/298.257222101.

7. How does the data set describe geographic features?

PLIBRARY.ENVIRO.xxxx206553

Polygon attribute table (Source: King County)

OBJECTID

Internal feature number. (Source: ESRI)

Sequential unique whole numbers that are automatically generated.

ACRES

Acres as measured by GIS. (Source: King County)

Range of values	
Minimum:	1.00372
Maximum:	19940.28724

Shape

Feature geometry. (Source: ESRI)

Coordinates defining the features.

Shape.area

Feature area in square feet. (Source: ESRI)

Shape.len

Feature perimeter in feet. (Source: ESRI)

CAT_CODE

Critical Aquifer Recharge Area codes (Source: King county)

Value	Definition
CARA I	Areas of unincorporated KC that have 'H'- ASGWC within a sole source area
CARA II	Areas of unincorporated KC that have a 'M' - ASGWC within a sole source area
CARA III	Areas of Vashon-Maury Island not already CARA I or II

Entity_and_Attribute_Overview:

This dataset depicts Critical Aquifer Recharge Area classes as determined by the source dataset (ASGWC95, KCWHPA, SSAQUIF) analysis.

Entity_and_Attribute_Detail_Citation: None

Who produced the data set?

1. Who are the originators of the data set? (may include formal authors, digital compilers, and editors)

- King County

2. Who also contributed to the data set?

Groundwater Protection Program and University of Washington Department of Earth and Space Science. See also Eric Ferguson, DNRP/WLRD/Groundwater Group, 206-263-6512 for more details.

3. To whom should users address questions about the data?

King County Dept. of Natural Resources and Parks, Water and Lands Resources Division
 Attn: Ken Rauscher
 Senior GIS Analyst
 201 South Jackson Street, Suite 706
 Seattle, WA 98104
 US

206-296-1922 (voice)

Why was the data set created?

Developed as part of King County proposed amendments to its Critical Areas Ordinance; it took effect on 01/01/2005. State law required KC to review and update; if necessary; its CARA provisions in order to ensure that the county's regulations are adequately protecting aquifers that are used to supply drinking water and sustain King County's natural water systems. Incorporated areas have been excluded from this layer intentionally, as this layer represents a unique land use standard defined only for unincorporated County areas. The following data was used in the Critical Aquifer Recharge Area Analysis: ASGWC [recently updated] Areas Susceptible to Groundwater Contaminants sdh_tot5yr (utility_ext) filtered on "king" in the county field sdh_tot10yr (utility_ext) filtered on "king" in the county field KCWPHA_1yr (utility) filtered on "HG" in the WHPA field sole_source (attached in this e-mail) Sole aquifer data from EPA is in SDW.

How was the data set created?**1. From what previous works were the data drawn?****2. How were the data generated, processed, and modified?**

Date: 12-Dec-2005 (process 1 of 3)

King County's existing CARA designation was adopted with the Critical Areas Ordinance in 2004. These designations are derived from existing susceptibility mapping based on data developed during the Groundwater Management Planning process in 1995 and new susceptibility mapping completed for Vashon - Maury Island in 2003.

Date: unknown (process 2 of 3)

From 2005 to 2008, King County Department of Natural Resources and Parks (DNRP) has contracted with GeoMapNW pursuant to an Interlocal partnership with the cities of Redmond, Woodinville and Issaquah, and the Sammamish Plateau Water and Sewer District, to remap geologic susceptibility in three new areas that are included in the proposed 2008 CARA update: Upper Issaquah Creek Valley, Redmond to Woodinville to Bear Creek Preston / High Point

Date: 15-Oct-2008 (process 3 of 3)

Ordinance 16267 was passed October 15, 2008 adopting the revised CARA map in Section 48, page 184 and revised CARA definition in sections 49 and 50, page 184 - 191. <<http://your.kingcounty.gov/mkcc/compplan/2008/signature2008-0128.2.pdf>> The revised CARA map adopted as attachment A to ordinance 16267 passed October 15, 2008. <http://your.kingcounty.gov/mkcc/compplan/2008/2008-0128.2_AttachA.pdf>

3. What similar or related data should the user be aware of?**How reliable are the data; what problems remain in the data set?****1. How well have the observations been checked?**

Unknown.

2. How accurate are the geographic locations?**3. How accurate are the heights or depths?****4. Where are the gaps in the data? What is missing?**

This dataset covers all of King County with the exception of incorporated areas (incorporated as of November 3, 2004).

5. How consistent are the relationships among the observations, including topology?

Dataset meets standard coverage QA/QC checks such as label errors, node errors.

How can someone get a copy of the data set?

Are there legal restrictions on access or use of the data?

Access Constraints: None

Use Constraints:

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1. Who distributes the data set? (Distributor 1 of 1)

KCGIS Center
Attn: Cheryl Wilder
Data Sales Coordinator
201 S Jackson St, Suite 700
Seattle, WA 98104
US

206-263-5220 (voice)

2. What's the catalog number I need to order this data set?

/plibrary2/enviro/shapes/polygon/cara.shp

3. What legal disclaimers am I supposed to read?

King County disclaims any warranty of use of any digital product or data beyond that for which it was designed.

4. How can I download or order the data?**o Availability in digital form:**

Data format: ESRI Shapefile

o Cost to order the data:

Contact KCGIS Client Services for the cost of reproduction - <http://www.kingcounty.gov/operations/GIS/ClientServices.aspx>

Who wrote the metadata?

Dates:

Last modified: 07-Dec-2012

Metadata author:

King County Dept. of Natural Resources and Parks, Water and Lands Resources Division
Attn: Ken Rauscher
Senior GIS Analyst
201 S Jackson St, Suite 706
Seattle, WA 98104
US

206-296-1922 (voice)

firstname.lastname@kingcounty.gov

Metadata standard:

FGDC Content Standard for Digital Geospatial Metadata (FGDC-STD-001-1998)

Generated by mp version 2.9.12 on Mon Aug 21 16:56:08 2023

Site1: Historic Neighborhood



Figure 12. Various Building Styles - Historic Victorian Style Building

Net Site Density	3.38 du/ac
Gross Site Density	2.24 du/ac
Median Lot Size	0.24 acres (10500sf)
Typical Lot Dimensions	140'x100'; 140'x75'
Average Lot Coverage	10.07%
Building Height	1 story
Avg. Bldg. Footprint	1,062 SF
Typical Buildings	various architecture style, gabled roof
Landscape feature	Tall mature trees
ROW width	75'
Sidewalks	Yes (no curbs)
Alley Access	Yes
Street Parking	Yes

Site2: Post-War Neighborhood



Figure 22. One-Story Ranch Home with Attached Garage

Net Site Density	2.57 du/ac
Gross Site Density	2.07 du/ac
Median Lot Size	0.38 acres(16474sf)
Typical Lot Dimensions	160'x100'
Average Lot Coverage	9.08%
Building Height	1 story
Avg. Bldg. Footprint	1,500 SF
Typical Buildings	1-2 story ranch homes, Gable & Valler roof,
Landscape feature	Large mature trees
ROW width	60', 80'
Sidewalks	Yes (no curbs)
Alley Access	No
Street Parking	Yes

Site3: Recent Developments



Figure 31. Monotonous Architectural Style

Net Site Density	7.08 du/ac
Gross Site Density	3.40 du/ac
Median Lot Size	0.14 acres (6299sf)
Typical Lot Dimensions	105'x50'; 107x60'
Average Lot Coverage	20.16%
Building Height	2 story
Avg. Bldg. Footprint	1,200 SF
Typical Buildings	2 story ranch style
Landscape feature	Small lawn with some short shrubs
ROW width	90'
Sidewalks	Yes (no curbs)
Alley Access	No
Street Parking	No

Scope

1. Development regulations that affect lot dimensions and building size and bulk for residentially zoned properties in the Rural Town of Fall City.
2. Evaluation of the rural character, consistent with the Growth Management Act definition, of the residential areas of the Rural Town of Fall City through an analysis of:
 - typical land use patterns,
 - architectural and natural features,
 - densities and dimensions, and
 - community-identified cultural assets;
3. Analysis of whether development regulations described in section 1 are appropriate and consistent with adopted policies regarding rural character and rural growth;
4. Community Engagement
5. Propose as part of the Subarea Plan, any recommended amendments to development regulations, the Subarea Plan, King County Comprehensive Plan policies, zoning, or any combination thereof, that would address the impacts and concerns identified in section 1 of Ordinance 19613.

Current development regulations that affect lot dimensions and building size and bulk for residentially zoned properties in the Rural Town of Fall City:

- R-4 Zoning District
- Max Density 4 units/acre (10,890 sq ft per lot, no minimum lot size)
- No minimum density
- No minimum lot area
- Front Setback 10'
- Minimum Lot Width 30'
- Base Height 35'; Max Height 75' (requires additional setback - Fall City could be exempted in updated regulations)
- Maximum Impervious Surface 55%
- Mostly residential uses, allows for parks, hospitals, some small scale retail, cultural uses
- Accessory dwelling units are permitted with some limitations
- Parking Requirements:
 - Single detached/Townhouse - 2.0 per dwelling unit
 - Studio units - 1.2 per dwelling unit
 - One bedroom units - 1.5 per dwelling unit
 - Two bedroom units - 1.7 per dwelling unit
 - Three bedroom units or larger - 2.0 per dwelling unit

Planning Terms

Building Footprint

FAR

Net Density

Gross Density

Included road, sidewalks, shared amenities etc.

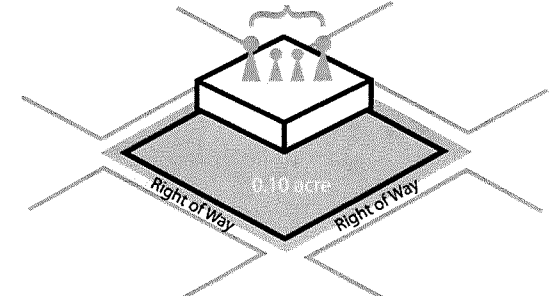
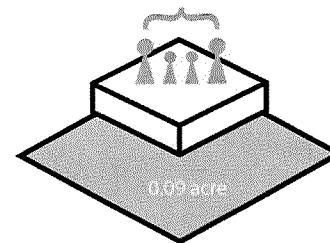
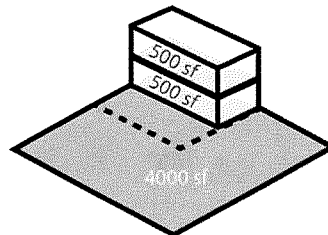
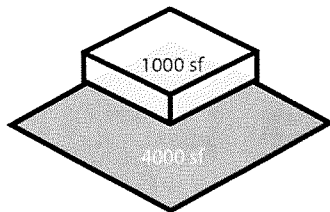
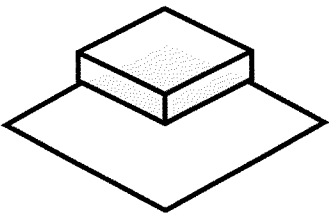
Building Footprint

Floor Area of Building

Floor Area of Building

1 Dwelling Unit

1 Dwelling Unit



Lot Size

Lot Size

Acre of Net Residential Area

Acre of Gross Residential Area

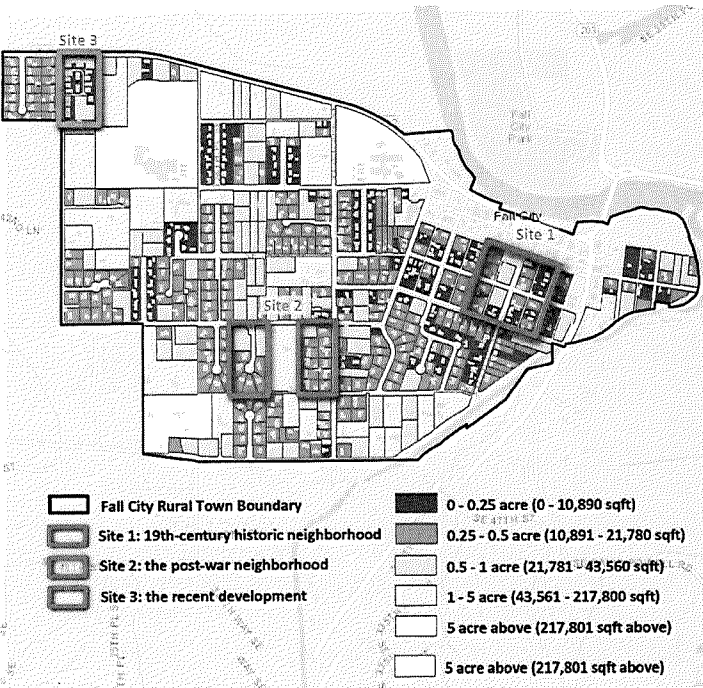
$$\frac{1000 \text{ sf}}{4000 \text{ sf}} = 0.25$$

$$\frac{500 \text{ sf} + 500 \text{ sf}}{4000 \text{ sf}} = 0.25$$

$$\frac{1 \text{ Dwelling Unit}}{0.09 \text{ acre}} = 11.11 \text{ (du/ac)}$$

$$\frac{1 \text{ Dwelling Unit}}{0.10 \text{ acre}} = 10 \text{ (du/ac)}$$

Lot Sizes Analysis



	R-4 Area Overall	Site 1	Site 2	Site 3
Lot Amount	552	22	19	20
Median Lot Size	0.32 acres (14,094 sf)	0.24 acres (10,500 sf)	0.38 acres (16,474 sf)	0.14 acres (6,299 sf)
Median FAR Range FAR	0.11 (0.00-0.61)	0.11 (0.04-0.42)	0.15 (0.05-0.26)	0.58 (0.41-0.7)
Gross Density (du/ac)	1.81	2.24	2.07	3.40
Median Net Density (du/ac)	3.11 (0.14-8.82)	4.15 (1.56-6.22)	2.64 (1.17-6.43)	6.95 (5.19-8.82)
Avg. Building Footprint	1336 sf	1062 sf	1501 sf	1216 sf

Findings

1. Area-Based Density Allowances Are a Key Driver of Recent Development Patterns.
 - a. Reduces lot sizes
 - b. Adds shared open space without criteria
 - c. Increases Floor to Area (FAR) ratios
2. Historic Rural Residential Development in Fall City typically has larger lots, more mature landscaping, less impact on the streetscape from parking and access, more space between buildings, and no common open space (except public parks).
3. Smaller lots and more shared open space limit future infill opportunities for smaller buildings/units that are in keeping with rural character.
4. Architectural sameness within new developments is not consistent with the rural town design elements in Fall City.
 - a. Large attached garages
 - b. Bulky buildings
 - c. Similar architecture, different colors
 - d. Driveways dominate frontages
 - e. Minimal distance between buildings

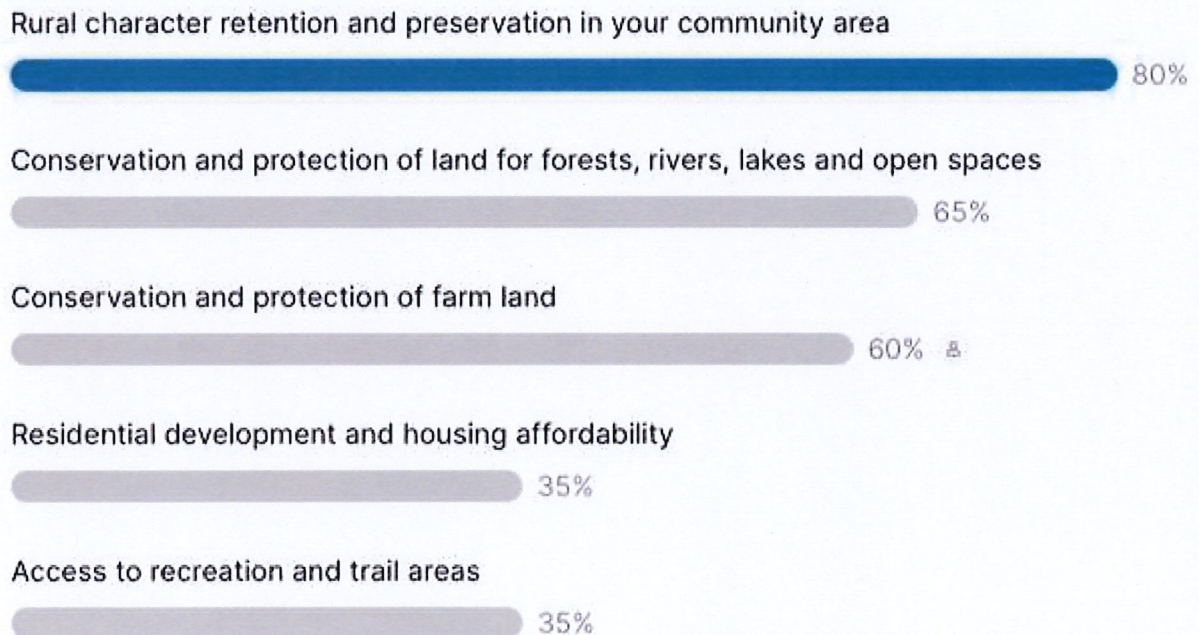
Scoping results from September survey

Most important subjects

- **Land use and zoning** – Conservation and protection of land for forests, rivers, lakes and open spaces (84%)
- **Housing and human services** – Housing affordability and services for seniors (tie at 52%)
- **Natural resources/parks/open space and cultural resources** – River restoration/salmon recovery (66%)
- **Transportation** – Road maintenance (74%)
- **Services and utilities** – Internet availability, quality, and affordability (74%)
- **Economic development** – Local/small farm economic support (82%)
- **Climate change/hazard mitigation and resilience** – Reforestation/natural systems protection (68%)

☰ Select the following land use and zoning subjects important to you

2



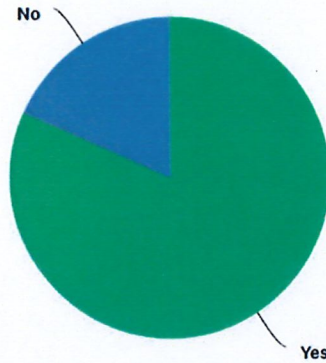
Excerpt from Fall City Community Subarea Stewards Survey , August 2022

A3

Paid for by Fall City Community Association, mailed to every household.

Q2 Most of Fall City is zoned four lots per acre. That translates to a minimum lot size of a 1/4 acre (10,890 sq. ft.) in the rural town boundary. The recent and ongoing higher-density developments feature lots that can be much smaller than 1/4 acre. Do you favor a minimum lot size of 1/4 acre?

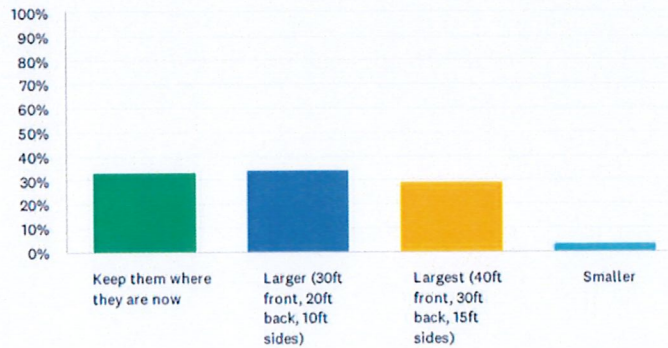
Answered: 481 Skipped: 5



ANSWER CHOICES	RESPONSES	
Yes	81.70%	393
No	18.30%	88
TOTAL		481

Q6 One way to increase house size in a subdivision or existing lots is to reduce the distance from the building to the front, back and side-yard boundary, known as setbacks. One way to discourage big houses on small lots is to increase setback distances. What size setback would you support?

Answered: 462 Skipped: 24



ANSWER CHOICES	RESPONSES	
Keep them where they are now	33.33%	154
Larger (30ft front, 20ft back, 10ft sides)	34.42%	159
Largest (40ft front, 30ft back, 15ft sides)	29.00%	134
Smaller	3.25%	15
TOTAL		462

21A.12.030 Densities and dimensions - residential and rural zones (expires January 2, 2025*).

A. Densities and dimensions - residential and rural zones.

STANDARDS	RURAL				RESIDENTIAL								
	RA-2.5	RA-5	RA-10	RA-20	UR	R-1 (17)	R-4	R-6	R-8	R-12	R-18	R-24	R-48
Base Density: Dwelling Unit/Acre (15) (28)	0.2 du/ac	0.2 du/ac	0.1 du/ac	0.05 du/ac	0.2 du/ac (21)	1 du/ac	4 du/ac (6)	6 du/ac	8 du/ac	12 du/ac	18 du/ac	24 du/ac	48 du/ac
Maximum Density: Dwelling Unit/Acre (1)	0.4 du/ac (20)						6 du/ac (22) 8 du/ac (27)	9 du/ac (27)	12 du/ac (27)	18 du/ac (27)	27 du/ac (27)	36 du/ac (27)	72 du/ac (27)
Minimum Density: (2)							85% (12) (18) (23)	85% (12) (18)	85% (12) (18)	80% (18)	75% (18)	70% (18)	65% (18)
Minimum Lot Area (13)	1.875 ac	3.75 ac	7.5 ac	15 ac			10,000 sf (30)						
Minimum Lot Width (3)	135 ft	135 ft	135 ft	135 ft	35 ft (7)	35 ft (7)	30 ft	30 ft	30 ft	30 ft	30 ft	30 ft	30 ft
Minimum Street Setback (3)	30 ft (9)	30 ft (9)	30 ft (9)	30 ft (9)	30 ft (7)	20 ft (7) (29)	10 ft (8) (30)	10 ft (8)	10 ft (8)	10 ft (8) (30)	10 ft (8) (30)	10 ft (8) (30)	10 ft (8) (30)
Minimum Interior Setback (3) (16)	5 ft (9)	10 ft (9)	10 ft (9)	10 ft (9)	5 ft (7)	5 ft (7) (29)	5 ft (10) (30)	5 ft (10) (30)	5 ft (10) (30)	5 ft (10) (30)	5 ft (10) (30)	5 ft (10) (30)	5 ft (10) (30)
Base Height	40 ft	40 ft	40 ft	40 ft	35 ft	35 ft (29)	35 ft (25a) (25a)	35 ft (25a) (25a)	35 ft (25a) (25a)	60 ft	60 ft	60 ft	60 ft
Maximum Height	75 ft (4)	75 ft (4)	75 ft (4)	75 ft (4)	75 ft (4)	75 ft (4)	30 ft (25b) (4) 75 ft (4)	45 ft (14) (25b) (4) 75 ft (4)	45 ft (14) (25b) (4) 75 ft (4)	75 ft (4)	75 ft (4)	75 ft (4)	75 ft (4)
Maximum Impervious Surface: Percentage (5)	25% (11) (19) (26)	20% (11) (19) (26)	15% (11) (19) (24) (26)	12.5% (11) (19) (26)	30% (11) (26)	30% (11) (26)	55% (26)	70% (26)	75% (26)	85% (26) (30)	85% (26) (30)	85% (26) (30)	90% (26) (30)

Existing

21A.12.030 Densities and dimensions - residential and rural zones.

A. Densities and dimensions - residential and rural zones.

STANDARDS	RURAL				RESIDENTIAL								
	RA-2.5	RA-5	RA-10	RA-20	UR	R-1 (17)	R-4	R-6	R-8	R-12	R-18	R-24	R-48
Base Density: Dwelling Unit/Acre (15) (28)	0.2 du/ac	0.2 du/ac	0.1 du/ac	0.05 du/ac	0.2 du/ac (21)	1 du/ac	4 du/ac (6)	6 du/ac	8 du/ac	12 du/ac	18 du/ac	24 du/ac	48 du/ac
Maximum Density: Dwelling Unit/Acre (1)	0.4 du/ac (20)						6 du/ac (22) 8 du/ac (27)	9 du/ac (27)	12 du/ac (27)	18 du/ac (27)	27 du/ac (27)	36 du/ac (27)	72 du/ac (27)
Minimum Density: (2)							85% (12) (18) (23)	85% (12) (18)	85% (12) (18)	80% (18)	75% (18)	70% (18)	65% (18)
Minimum Lot Area (13)	1.875 ac	3.75 ac	7.5 ac	15 ac			10,000 sf (30)						
Minimum Lot Width (3)	135 ft	135 ft	135 ft	135 ft	35 ft (7)	35 ft (7)	30 ft	30 ft	30 ft	30 ft	30 ft	30 ft	30 ft
Minimum Street Setback (3)	30 ft (9)	30 ft (9)	30 ft (9)	30 ft (9)	30 ft (7)	20 ft (7) (29)	10 ft (8) (30)	10 ft (8)	10 ft (8)	10 ft (8) (30)	10 ft (8) (30)	10 ft (8) (30)	10 ft (8) (30)
Minimum Interior Setback (3) (16)	5 ft (9)	10 ft (9)	10 ft (9)	10 ft (9)	5 ft (7)	5 ft (7) (29)	5 ft (10) (30)	5 ft (10) (30)	5 ft (10) (30)	5 ft (10) (30)	5 ft (10) (30)	5 ft (10) (30)	5 ft (10) (30)
Base Height	40 ft	40 ft	40 ft	40 ft	35 ft	35 ft (29)	35 ft (25a) (25a)	35 ft (25a) (25a)	35 ft (25a) (25a)	60 ft	60 ft	60 ft	60 ft
Maximum Height	75 ft (4)	75 ft (4)	75 ft (4)	75 ft (4)	75 ft (4)	75 ft (4)	30 ft (25b) (4) 75 ft (4)	45 ft (14) (25b) (4) 75 ft (4)	45 ft (14) (25b) (4) 75 ft (4)	75 ft (4)	75 ft (4)	75 ft (4)	75 ft (4)
Maximum Impervious Surface: Percentage (5)	25% (11) (19) (26)	20% (11) (19) (26)	15% (11) (19) (24) (26)	12.5% (11) (19) (26)	30% (11) (26)	30% (11) (26)	55% (26)	70% (26)	75% (26)	85% (26) (30)	85% (26) (30)	85% (26) (30)	90% (26) (30)

Requested

66 **Map Amendment 2: Snoqualmie Valley/Northeast King County – Fall City**
 67 **Residential Dimensional Standards**

68 AMENDMENT TO THE KING COUNTY ZONING ATLAS
 69

70
 71 Amend Sections, Townships, and Ranges, as follows:
 72

Section 14	Township 24	Range 7
Section 15	Township 24	Range 7
Section 16	Township 24	Range 7

73 **ZONING**
 74

75 1. Add P-Suffix SV-PXX to the following parcels:
 76

77

0279600010	0279600020	0279600030	0279600040
0279600050	0279600060	0279600070	0279600080
0279600090	0279600100	0279600110	0279600120
0279600130	0279600140	0279600150	0279600160
0279600170	0279600180	0279600190	0279600200
0318900010	0318900020	0318900030	0318900040
0318900050	0318900060	0318900070	0318900080
0318900090	0318900100	0318900110	0318900120
0318900130	0318900140	0318900150	0318900160
0318900170	031890TRCT	0732700010	0732700020
0732700030	0732700040	0943100020	0943100100
0943100110	0943100140	0943100143	0943100145
0943100160	0943100197	0943100198	0943100199
0943100200	0943100201	0943100202	0943100203
0943100204	0943100220	0943100221	0943100222
0943100223	0943100235	0943100260	0943100261
0943100262	0943100263	0943100264	0943100265
0943100266	0943100267	0943100268	0943100269
0943100270	0943100271	0943100272	0943100273
0943100274	0943100280	0943100281	0943100282
0943100283	0943100284	0943100285	0943100286
0943100287	0943100288	0943100289	0943100290
0943100300	0943100301	0943100302	0943100304
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0943100363	0943100365	0943100367	0943100369
0943100371	0943100379	0943100380	0943100381
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0943100427	0943100439	0943100440	0943100441
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0943100460	0943100462	0943100464	0943100476
0943100478	0943100479	0943100480	0943100481
0943100482	0943100483	0943100484	0943100485
0943100486	0943100488	0943100500	0943100501

Respond by email -
Do not read

Comment Form



King County

2024 King County Comprehensive Plan Update

Name: Deborah Lawrence

Email: lawrence-s@msn.com

Check to receive email updates on the 2024 Comprehensive Plan Update

Which best describes your interest in the 2024 King County Comprehensive Plan Update?

I live in King County I work in King County Professional interest

ABOUT THE 2024 KING COUNTY COMPREHENSIVE PLAN UPDATE

The King County Comprehensive Plan is the guiding policy document for land use and development in unincorporated King County. The 2024 Comprehensive Plan Update includes substantive policy changes, map amendments, and development regulation updates. It includes updates to comply with state law changes and updates to underlying data in the Comprehensive Plan.

The 2024 Comprehensive Plan Update also includes a subarea plan for the Snoqualmie Valley/Northeast King County area and updates to Countywide Planning Policies around the Four-to-One Program.

Use the space below to comment on the 2024 King County Comprehensive Plan Update.

I live up at Lake Margaret in Duvall
and the 25+ years I have been there
the road around the lake has never
been paved. I would be interested
in a full paving project vs just
filling in pot holes. The road is
in desperate need for repair. Email
is the best form of communication.
Thank you, Deborah Lawrence

2/18/24

Comment Form



King County

2024 King County Comprehensive Plan Update

Name: LACY LINNEY

Email: LACYLINNEY@GMAIL.COM

Check to receive email updates on the 2024 Comprehensive Plan Update

Which best describes your interest in the 2024 King County Comprehensive Plan Update?

I live in King County I work in King County Professional interest

ABOUT THE 2024 KING COUNTY COMPREHENSIVE PLAN UPDATE

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The 2024 Comprehensive Plan Update also includes a subarea plan for the Snoqualmie Valley/Northeast King County area and updates to Countywide Planning Policies around the Four-to-One Program.

Use the space below to comment on the 2024 King County Comprehensive Plan Update.

AS A RESIDENT OF FALL CITY, I SUPPORT THE PROPOSED CHANGES

PROVIDED BY ANGELA DONALDSON (ALSO OF FALL CITY) & OUR

SUB-AREA STEWARDS. THIS INCLUDES MINIMUM SETBACKS:

STREET 30ft; INTERIOR 10ft; BACK 20ft. NET DENSITY OF

4 DWELLING UNITS/ACRE. AND DESIGNATION OF A MINIMUM

LOT SIZE OF 10,000sqft.

THANKS!

From: [Debby Peterman](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: Changes to comp plan
Date: Sunday, March 10, 2024 4:11:03 PM

I support the protection of sensitive areas but there is no enforcement or review of these areas so the rules and regulations go unheeded. There are violations everywhere but no monitoring or enforcement so the rules are useless.

From: [Rachael Hogan](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: Comprehensive Plan - Rezone to Allow for More Housing
Date: Sunday, March 10, 2024 7:45:57 PM

My name is Rachael Hogan, I live in an apartment in Kenmore. I wanted to reach out and share my support for rezoning in King County to include more dense, urban housing. Rezoning to allow for a walkable city and more affordable housing is a dream come true! Lower land cost, cheaper building cost per unit, a walkable city that promotes local businesses, centered around public transportation to reduce the necessity of cars, leaving green space to preserve nature and fight climate change and more. We cannot allow single family houses to occupy most residential zoning, it's shortsighted and doesn't serve the true needs of our growing communities. Rezoning to allow duplex, condos, and apartments is the change we need. Increasing our housing supply around desirable areas with dense, urban housing should be our top priority!

This change is needed across America, as single family zoning laws are unsustainable. We are seeing the consequences of these zoning laws play out as people desperately compete for housing. America has been underbuilding homes for years, and single family zoning laws prevent us from building affordable housing that so many Americans need. Some estimates show we are missing four million homes across America, and the need for housing is driving home prices and rents to unsustainable levels. Kenmore is not alone in our archaic zoning laws, but I am so proud that King County is taking steps to build better cities and be a leader for zoning reform in our country.

I spent over a year trying to buy my first home in 2021, but the lack of housing supply has left people to compete in insane bidding wars just to find a place to live. The 1980 townhomes I was bidding on got offers of 20% - 25% over the listing price! The housing shortage in this area is hugely damaging to our population, especially to those who have not had the opportunity to buy a home before these surging home prices. Rezoning is not a quick solution, but it is a long term solution, with financial and environment sustainability at its heart. I know this won't help me buy a home today, but the need to provide for future home owners and residents is a bigger priority. We need sustainable solutions, and rezoning is a great start.

New zoning will bring change, such as needed infrastructure. It saddens me to see some residents balk at this proposal. So many are thinking of short term problems. Rezoning is not a short sighted goal, it is a fundamental shift to our cities. This is an amazing opportunity to shape King County for the better.

As a public school teacher, my dream of owning my own home feels impossible at times. I want to be able to live in the community I serve, and rezoning is a huge step in making that happen for myself, and many others. Thank you for bringing this proposal to our county, I am

From: [jennie mayberry](#)
To: [Dunn, Reagan](#); [Legislative Staff, Council CompPlan](#)
Cc: [Jensen, Chris](#); [Joe & Elizabeth](#)
Subject: ADU + TDR changes in the law--please read
Date: Tuesday, March 12, 2024 9:33:25 AM
Attachments: [letter from Jennie Cowan.pdf](#)

Please find attached letter regarding potential changes in the law regarding ADUs and TDRs. Thank you

From: [Wayne Gullstad](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: Comp Pan comments for Local Services and Land Use Committee
Date: Saturday, March 16, 2024 5:50:24 PM

Submitted by Wayne Gullstad, gullstad@comcast.net

The following is a more comprehensive version of my public comment at the March 7, 2024 meeting in Duvall to review the 2024 Comprehensive Plan. My comments focus specifically on the County's claim that it used Best Available Science for the proposed new recommendations for widths of vegetated buffers along water courses.

The County's basis for proposed new waterside vegetated buffer widths is sound in its intent, is likely supportable (in an ecological context) by Best Available Science, yet is justified using a flawed and manipulated principal. Site Potential Tree Height, the basis for the County's new recommendations, though widely used, was not derived through science. It will yield suboptimal results. It will have difficulty standing up to challenges of the Best Available Science basis.

The County's updates to the Comprehensive Plan were to be derived using Best Available Science ("BAS"). Site Potential Tree Height ("SPTH") is neither "Best" nor "Science". The principal was created in 1993 as a "use your best judgement" approach to providing quick guidance for a starting point in an effort to restore the spotted owl. Its originators stated as much saying it was only intended as an interim solution until proper analyses could be done. A lot of proper analyses have occurred in the past 30 years. A lot of solid science.

The County argues that SPTH is widely used, widely supported, and generally coincides with effective buffer widths. If so, who cares? Well, setting aside the most fundamental problem--that it's not science based--by basing their buffer recommendations on SPTH, the County faces these potential problems:

1. Applying SPTH results in abrupt, large, and unexplainable jumps in projected buffer widths;
2. SPTH does not necessarily generate recommended buffer widths that provide optimum ecological function; and
3. by hitching their recommendation directly to SPTH, the County leaves itself boxed into that specific number.

Let's take a closer look at that last point. Regulatory buffer widths have evolved over time. This is likely driven by a number of things: new and better science; a better societal understanding of the value of buffers; and increased urgency as species continue to struggle. We may well decide that *wider* buffers are necessary in the future. What do we do if we've anchored our recommendation to a number? For example, we decide now that, based on SPTH, the buffer needs to be 200 feet wide. Six years later, how do you argue for 250 foot buffers? Is it still based on SPTH but 1.25 times better science?

The County's own science team might be making the best case for the lack of efficacy of SPTH. They ran smack into the first two problems noted above. When confronted with 50 or more different SPTH-generated buffer widths across the County (some more than double others), the science team opted to reduce the complexity by taking

the average.[1] (That's like reducing the complexity of your medications by taking an average of the prescribed doses and applying it to all the medications.) Gone is one fundamental tenet of SPTH—that the buffer is to equal the height of the dominant trees with the potential to grow at that specific site.

And when the average SPTH buffer was calculated, it was too small! The buffers were presumed be too narrow to provide adequate ecological function. The science team's solution? Replace one of the species. The new species is much taller thereby projecting a buffer of...200 feet.[2] (Never mind that the replacement species does not generally occur in the extensive stands contemplated by the SPTH concept.) Gone is the second tenet of SPTH—that it is based on the species of tree that would dominate that site.

The County's science team, by opting to use averages and swapping tree species, washes away any residual notion that the SPTH-derived recommended buffer widths are reliable science-based predictors of buffer width.

Furthermore, SPTH ignores completely any element of the cost/benefit relationship.

The economics vary as buffer size changes. For most beneficial functions, buffer effectiveness diminishes as the width increases. Put another way, the wider the buffer gets, the less benefit each incremental foot delivers: the law of diminishing returns. Because there is social cost to buffers (lost opportunity cost to the land owner, for example), there needs to be some attempt to balance cost and benefit. SPTH completely ignores the cost side. Can the County possibly present buffer recommendations for which they have only considered optimal biological function with no regard to the societal cost?

Available research does not make it easy to assess the cost side. Much of the research was undertaken on public lands where the incremental cost of leaving a larger buffer is arguably close to zero. As such, the research focuses on the optimal buffer width that will deliver 100 percent of the ecological gain. However, for buffers on private land (or public land with competing public uses) the cost side cannot be ignored. We simply can't take the "optimal" buffer width derived from research in a national forest and apply it to private lands. King County cannot impose such a regulation while disregarding the cost to the land owner and disregarding other social costs as well. And because of the diminishing returns on the biological lift (as noted above), there are typically good compromises available. For example, if 100 percent ecological lift occurs with a buffer of width X, it may well be that 80 percent of the lift will occur at a width of *one half X*. Clearly, the cost/benefit economics must be considered.

Ironically, the number the science team settled on, 200 feet, may well be derived based on good science. The County's science team has been exposed to a significant amount of solid buffer science. Few outside the realm of research scientists have read as much peer reviewed research on the subject. At this point their instincts aren't just best guesses, they're well-informed recommendations. It may well be that their science-supported instincts are what drove them to manipulate the SPTH result until it yielded their desired 200 foot recommendation. Why the science team altered and contorted the SPTH principal until it finally generated the answer they wanted is difficult to understand. Without manipulation, the SPTH approach yielded unacceptable results. This alone is a good indicator that it is flawed.

King County's science team is very well informed in the research into vegetated buffer

widths. The Team has the knowledge to develop a recommendation that is well supported by science. It's the County's obligation, however, to ensure not only the scientific veracity but the economic equity as well.

Having based their existing recommendation on SPTH (albeit a manipulated version) it may be difficult for the science team to abandon the SPTH concept. But, effectively, they have already done so. It would be appropriate to remove any reference to SPTH from the Comprehensive Plan. The SPTH model is not science-derived, won't directly generate acceptable numbers, ignores cost/benefit, and boxes the County in to a number that might be difficult to change in the future.

[1] Best Available Science Updates to Critical Area Protections, King County, February 2024, P. 57.

[2] Best Available Science Updates to Critical Area Protections, King County, February 2024, P. 58.

so excited to see cities change their zoning laws and change for the better!

Sincerely,

Rachael Hogan

From: sycoon@aol.com
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: March 20 / Rural Areas & Natural Resources
Date: Tuesday, March 19, 2024 8:03:09 AM

Dear King County Council:

I wish to voice my concern regarding the Carnation Farm and Remlinger Farm concert venues.

I am against this for several reasons, first this is a "rural community" with winding farm roads that cannot withstand car traffic of up to 4,000 people or 10,000 collectively. The roads are two lane roads and are in poor condition already - have you driven the Snoqualmie Valley Road recently? It is full of dips and uneven pavement. In the spring and summer months, these roads are filled with bicyclist, motorcycles and farm equipment. The roads cannot handle this type of capacity, and will affect the wellbeing and livelihood of those who reside here. All of the extra vehicles on the road will endanger the bicyclists and farmers greatly. There are no sidewalks or shoulders for these bicyclists or farmers to move over to, and for out-of-towners how are in a hurry to get to their concert venue, this will cause frustration and dangerous driving situations, such as passing and speeding.

This is a relatively safe and clean community and I fear bringing in concerts would promote theft, littering and additional disturbances (revving of car engines, drunken disturbances, drunk driving, etc.). The community that I live in is right up above and behind the Carnation Farm. We purchased our home for the tranquility of "country living." The thought of concert music permeating the air during our days or evenings is not something we are in support of.

How will the Carnation town police/fire department handle this volume of people? How is the extra traffic going to be handled? Where are people going to park?? The town's resources are limited and how is the town to handle a large emergency if one were to occur?

One last thing to keep in mind is the large herd of Elk that come down into the valley frequently. These elk cross the roads right at the Carnation Farm, you can see their pathways into the woods, and they may either (1) be driven away from this area due to the music and traffic and/or (2) cause a horrible accident. People who come and visit this area with no knowledge of the happenings of the elk herd will not be cognizant of them and could potentially be involved in a very serious accident. We personally have experienced the elk crossing the road in front of us.

Please dig a little deeper into the repercussions of such venues in Carnation and

perhaps reconsider your decision in allowing them. We understand the farms want to generate income and small weddings or gatherings wouldn't be a problem, it is these large concerts and happenings with thousands of people that present a problem for the community.

Thank you for your consideration,

Michael and Dena Beeney

5612 294th Ave NE

Carnation, WA 98014

From: [Jenn Dean](#)
To: [KCC - Legislative Clerks \(Email Group\)](#); [Perry, Sarah](#); [Chan, Jim](#); [Mosqueda, Teresa](#); [Taylor, John - Dir](#)
Subject: Comments Re: Remlinger Farm concert series, Carnation Farm concert series
Date: Tuesday, March 19, 2024 10:44:36 AM
Attachments: [Outlook-wf0ai3xn.png](#)

Dear King County Local Services and Land Use Committee:

As a longtime resident of Carnation, I am opposed to the scope of the proposed concert series at both large farms that essentially bracket the town of Carnation (Remlinger and Carnation Farms).

First, Remlinger seems to have rammed the permit process through somehow, without thoughtful or public process. How is this possible? They do not have a history of having the proposed number of people at the proposed number of events. At all. The scope of their proposal is far above what has happened historically.

Both the number of people at each event and the number of events is concerning on many levels. I'm concerned about:

--negative impact to sensitive ecological environment along the Tolt River and Snoqualmie River

--negative impact of seriously high decibel levels during concerts (as what already happens during Remlinger's corporate events with music, and the huge concert they had last summer) on wildlife and on our quality of life. I'm .6 miles from the Tolt and could hear the concert last summer. Way too loud.

--impact of that number of people and cars on our town. Illegal camping all over town at last year's Remlinger concert.

--our town already has issues with the traffic on 203 during the summer for smaller events. That many cars, people, etc. will jam the roads, and prevent emergency vehicles from getting through. Accidents and DUI's are a concern, without camping facilities provided by the venues.

--location of concerts in floodplain areas --impact on water quality, increased pollution, increased use

--use of our town as a playground for people coming from all over to hear national acts. Our community never agreed to this. We were never given a chance to have concerns heard.

--This feels like more of the same: rich corporations (STG) deciding how to make a buck without consulting the local community.

--Remlinger Farm has a history of illegal land practices and does not seem concerned about the environment at all. "We have enough green around here" is what one of the Remlinger patriarchs said at one of our city council meetings, in reference to their plan to pave over nearly every inch of a floodplain prone piece of land the city sold them. It speaks to the arrogant attitude they hold and are passing down to the younger generation.

Thanks for listening.

Jenn Dean, MFA

Jenn Dean Consulting, LLC

JennDean

I live and work on unceded lands of the sduk^walbx^w.

From: [Kris](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: Digital Comment for KC Meeting
Date: Tuesday, March 19, 2024 4:25:53 PM
Attachments: [Letter to KC.pdf](#)

Attached is my written public comment for the meeting being held on March 20:

LSLU Committee – Briefing 5
- Chapter 3: Rural Areas and Natural Resource Lands

Thank you!
Kristen

What is at Stake with zoning change

Rick Shrum <rick.shrum@hotmail.com>

Tue 3/19/2024 10:04 PM

To:Rick Shrum <rick.shrum@hotmail.com>

Theresa Mosqueda and KC Council members,

We are following up after our video conference of a couple of weeks ago. Thank you again for the time. Do you have any questions for us, are there any next steps coming up? You mentioned that there is a series of meetings with the KC Exec planning staff, Chris Jensen right?

If you can please share your thoughts now that you are up to speed. Below is some more food for thought.

Also, we will be putting our public comments in during a meeting or two, thank you for sending the schedule.

I also want to provide you with some information in regard to policy, and what is at stake, going forward with the change of zoning code for RA-5 to accomplish a spot zoning.

The stakes are high, and the issues are pretty significant from a legal standpoint. But, also, from a policy standpoint; how much power does The KC Exec have in the 10-year plan to override laws, previous rulings, constituents, etc? This grant of spot zoning is a mighty hand wave at all kinds of things.

There are also some very practical considerations of fairness and what is right and wrong at play as well and should the public be able to count on the stated reasoning for why decisions are being made are true and not done for political maneuvering or with conflicted interests.

But what we are trying to do is stop an effort that we believe should be done **a different way**. As we shared with Erin, we are coming from the perspective of: Not in My Backyard This Way, NIMBYTW! And Teresa, we are again asking for your support in stopping this current effort and as a follow on to this, bringing together a planning and zoning process that will be a win-win for all not just one property owner at the expense of others' and our community's future options.

What is at stake by allowing the zoning code change for the old Grange:

- The precedent that Dow Constantine has King-like power when it comes to land use laws and rules in the KC Execs 10 year comp plan update
- That RA-5 zoning in KC now includes Food Stores (never before conditional use)
- That a KC property "bad actor" property and tax scofflaw (getting an underserved tax break) property acquires special treatment and consideration from King County, the properties neighbor and past co-bad actor
- That in the KC Execs 10-year comp plan, the reasoning for a zoning code change does not need to be true and be provided to the public for comment with no serious resolve to the statement
- That a property that is literally on an Oso map overlay steep slope will be granted a spot zoning exception
- That a property that is zoned RA-5 is being pulled out of the housing stock potential at a time when housing is needed and is supposed to be a priority
- The potential for a sub-sub area planning process for the north end of Vashon taking into account transportation, communication and housing, which is the way forward under all existing laws and regulations and what KC land use, KC Council, and the proximal neighbors have said in rejecting or opposing this change, will be gone. And all related potential benefits for the community, the

proximal and nearby neighbors, will be forfeited forever for a very narrowly focused effort. Not in my back yard THIS WAY

- That a KC Council's decision from one year ago will be directly overturned
- That a KC Land use and planning department decision from 2 years ago will be directly overturned
- That the interests and interest in the future of this place of the proximal (30 feet - on 2 of 5 sides, KC is on 3 of the 5 sides) neighbors will be ignored
- That 4 areas (at least) of laws and regulations related to KC Master Plan and land use and zoning regulations are being swept aside if this zoning change is allowed to be done this way (previously have sent a legal opinion on this matter)

Rick Shrum and Ginger Ferguson
Vashon Island



BRICKLIN & NEWMAN LLP
lawyers working for the environment

Reply to: Seattle Office

November 13, 2023

Chris Jensen and Regional Planning staff
Regional Planning – PSB
401 Fifth Avenue, Suite 810
Seattle, WA 98104.

Emailed to: CompPlan@kingcounty.gov

Re: King County Comprehensive Plan 2024 Update
Proposed Amendment to KCC 21A.08.070.

Dear Ms. Jensen and Regional Planning Staff:

I represent Rick Shrum and Ginger Ferguson, who are both Vashon Island residents. Mr. Shrum and Ms. Ferguson are neighbors to the Vashon Grange Hall, which is located at 10365 SW Cowan Rd, Vashon, Washington 98070.

I am writing to comment on a proposed amendment to KCC 21A.08.070.A, which is included in the current Public Review Draft of the King County Comprehensive Plan 2024 Update.

This proposed amendment, which would allow “food stores” within Grange Halls in the Rural Area zone, is a textbook example of unlawful spot zoning. It has been crafted to specifically benefit Jennifer Potter, the owner of the Vashon Grange Hall, in her effort to replace the Grange Hall with a 24-hour grocery store, which she refers to as the “Vashon Heights Grocery.” It's a special privilege granted to a single property owner, creating an unequal advantage that sets her apart from everyone else.

To make matters worse, this unlawful spot zoning is inconsistent with the Growth Management Act, the King County Comprehensive Plan, and the Vashon Subarea Plan because it allows urban development in a rural zone outside of the Rural Town and Rural Neighborhood Commercial Center (RNCC) designations. This sort of change must be preceded by a sub-area planning process on Vashon for the Northend, not through illegal spot zoning. For these reasons, and as explained in more detail below, this amendment should not be included in the package that is presented to the City Council.

A. Background

Jennifer Potter, the owner of the Vashon Grange Hall, has been actively pursuing a plan to replace the Grange Hall with a 24-hour grocery store, which she refers to as the “Vashon Heights Grocery”

Rural Neighborhood Commercial Center land use designation. These rural centers are small pockets of commercial development in the Rural Area that provide limited, local convenience shopping, restaurants, and services to meet the daily needs of nearby rural residents.

While the creation of new Rural Neighborhood Commercial Centers is prohibited by Comprehensive Plan policy R-501, the policy does speak to expansion of existing centers and this would be accomplished through a subarea study. One of the challenges with expanding the commercial center to include this parcel is that the parcels between it and the nearby commercial center are built out with residential and other uses. The configuration of expanding the commercial center to include this property is challenging and could prove infeasible. This issue, along with other zoning, land use, environmental, public services and facilities issues on this parcel and the surrounding area, would first need to be evaluated in a subarea study. There may also be other remedies through amendments to the King County Code that would not result in the need for a land use or zoning change.²

The County ultimately declined to adopt the change because it would have required “substantive policy changes in order to be approved.”³ Specifically, in its 2024 Public Review Draft Summary, County staff stated that the 2022 attempt would have created:

...broader impacts throughout the Rural Area, which is not consistent with the Growth Management Act and Comprehensive Plan directives for the rural area. While there is an existing RNCC in the vicinity, expanding it to include this parcel would also need to include several intervening rural residential parcels, which would encourage commercial development at a scale that is not appropriate for this area and establish a poor precedent for other RNCCs.⁴

Additionally, in 2017 and 2018, before she was even the owner of the Vashon Grange, Ms. Potter reached out to you and Subarea Planner, Brad Clark about rezoning the property and expanding the boundary of a RNCC.⁵ Your response was ostensibly the same as your 2022 response; the proposal required substantive policy change and could not move forward without a subarea study.⁶

² See 2022 Docket Report - Request #4.

³ *Id.* at 6.

⁴ 2024 Comprehensive Plan Public Review Draft Summary, at 20.

⁵ See Email from Chris Jensen, dated April 10, 2018 (3:36 PM) addressed to Jennifer Potter.

⁶ *Id.*

this legislation would be the promotion and facilitation of Ms. Potter's specific plan to replace the Vashon Grange Hall with a 24-hour grocery store.

Spot zoning for the benefit of a particular project has been unlawful in Washington for over fifty years. As described in *Willapa Grays Harbor Oyster Growers Ass'n v. Moby Dick Corp*:

Spot zoning is "zoning action by which a smaller area is singled out of a larger area or district and specially zoned for a use classification totally different from and inconsistent with the classification of surrounding land and is not in accordance with the comprehensive plan." *Smith v. Skagit County*, 75 Wn.2d 715, 743, 453 P.2d 832 (1969); *accord Lutz v. Longview*, 83 Wn.2d 566, 573-74, 520 P.2d 1374 (1974); *Chrobuck v. Snohomish County*, 78 Wn.2d 858, 872, 480 P.2d 489 (1971). The main inquiry is whether the zoning action bears a substantial relationship to the general welfare of the affected community. *See Parkridge v. City of Seattle*, 89 Wn.2d 454, 460, 573 P.2d 359 (1978). Only where the spot zone grants a discriminatory benefit to one or a group of owners to the detriment of their neighbors or the community at large without adequate public advantage or justification will the county's rezone be overturned. *See Anderson v. Island County*, 81 Wn.2d 312, 325, 501 P.2d 594 (1972).⁹

When determining whether a spot-zone confers a benefit, courts will look to the goals and policies of a comprehensive plan and analyze if the spot-zone aligns with those goals and policies.¹⁰

There can be no dispute that the Grange Amendment was written and proposed for the sole purpose of accommodating Ms. Potter's site-specific development proposal. When you provided an email update on the "Vashon Grange property and proposed grocery store," you explained to your team that you were "recommending a King County Code change to accommodate" the proposed grocery store.¹¹ You said: "While this would also impact other properties in the unincorporated area in similar situations, we feel that this would allow for the proposal at this site while also still being consistent with the Comprehensive Plan."¹²

Along these same lines, as a practical effect, research by my clients has revealed that the Grange Amendment confers an exclusive benefit to this single property within the County. According to a 2013 study,¹³ there are seven Grange Halls in King County. Of those, only three are in unincorporated King County and subject to King County zoning: Happy Valley Grange, Cedar

⁹ *Willapa Grays Harbor Oyster Growers Ass'n v. Moby Dick Corp*, 115 Wn. App. 417, 432 (2003).

¹⁰ *Id.* at 432-434.

¹¹ Email corr. from Chris Jensen to Team (Jan. 29, 2023).

¹² *Id.*

¹³ Grange Halls in Washington State: A Critical Investigation of a Vernacular Building Type

character.¹⁸ In contrast, “urban growth,” as defined in RCW 36.70A.030(44), is development that is incompatible with rural development and subsequently rural character. The overall goals of the GMA include encouraging development in urban areas and reducing the inappropriate conversion of undeveloped land into sprawling, low-density development.¹⁹

The GMA requires counties planning under the GMA to include a rural element in its comprehensive plan and to create development regulations that protect and enhance that element.²⁰ The GMA recognizes that the rural element may include a variety of development, and as a result, the following designations (aka “exceptions”) have been created to allow for varied, more intensive development: Rural Town designations, Rural Neighborhood Commercial Center (RNCC) designations, and LAMIRDS (Limited Areas of More Intensive Rural Development).²¹

The boundaries of these areas are fixed and cannot be expanded to include a food store without further study. Specifically, regarding Rural Towns, the King County Comprehensive Plan states:

King County designates the Rural Towns of Fall City, Snoqualmie Pass, and the Town of Vashon as unincorporated Rural Towns. These historical settlements in unincorporated King County should provide services and a range of housing choices for Rural Area 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 subarea study**, and shall not allow significant increases in development potential or environmental impacts. **No new Rural Towns are needed to serve the Rural Area.**²²

Similarly, regarding RNCCs, the County’s Comprehensive Plan states:

The Rural Neighborhood Commercial Centers designated on the Comprehensive Plan Land Use Map are small-scale business areas that should provide convenience shopping and services for the surrounding community. No new Rural Neighborhood Commercial Centers are needed to serve the Rural Area and Natural Resource Lands. Expansion of the boundaries of the existing Rural

¹⁸ RCW 36.70A.030(36).

¹⁹ RCW 36.70A.020(1) and (2).

²⁰ RCW 36.70A.070(5); *see also* RCW 36.70A.011.

²¹ *See* King County Comprehensive Plan at 3-1; *see also* RCW 36.70A.070(5)(d). While the GMA allows for limited areas of more intensive rural development (LAMIRD) in RCW 36.70A.070(5)(d), the LAMIRD process is optional and King County has not opted to include LAMIRD in its planning process. Therefore, the GMA’s LAMIRD provision does not apply here.

²² *Id.* at 3-33 (R-504) (emphasis supplied).

the types of enterprises associated with rural character are farming businesses, agriculture, mining, and home businesses, not commercial grocery stores.²⁶

As County staff itself explained in the 2022 Docket Report when Ms. Potter attempted to amend the code last time, the limits on permitted uses in the RA 5 zone “are intended to prevent the encroachment of non-residential and non-resource based land uses in the Rural Area and, instead, to focus them into commercial centers, Rural Towns and, where present, neighboring cities. Vashon has multiple commercial centers, including one near the subject parcel.”²⁷ That same analysis applies here. The purpose of the RA zone is to provide for an area-wide long-term rural character.²⁸ Areas that are zoned RA 5 are rural areas where the predominant lot pattern is five acres or greater but less than ten acres in size.²⁹ Allowing a grocery store as an outright permitted use in the RA 5 zone runs directly counter to the intent of and uses in that zone.

That 2022 Docket Report also states: “One of the challenges with expanding the commercial center to include this parcel is that the parcels between it and the nearby commercial center are built out with residential and other uses. The configuration of expanding the commercial center to include this property is challenging and could prove infeasible. This issue, along with other zoning, land use, environmental, public services and facilities issues on this parcel and the surrounding area, would first need to be evaluated in a subarea study.”³⁰ Again, that same logic applies to the Grange Amendment.

The Grange Amendment violates the clearly defined limits of Rural Towns and RNCCs by allowing a commercial use not associated with rural character outside the Rural Town or RNCC designations. Moreover, the Grange Amendment detracts from the economic vitality of Rural Towns and RNCCs by opening the door for more commercial competition in rural areas. Both the County’s Comprehensive Plan and the Vashon Subarea Plan are unequivocal that no expansion or alterations to existing Rural Towns or RNCCs is desirable, and, thus, the Grange Amendment is in direct contravention with the goals and policies of the County’s Comprehensive Plan and Vashon’s Subarea Plan.

The Grange Amendment does not provide any type of housing choice, nor is it consistent with traditional rural land uses. Traditional rural land uses do not involve sprawled commercial food stores within a few miles of each other, but that is precisely what the Grange Amendment would allow, at least in the context of Vashon.

²⁶ See King County Comprehensive Plan at 3-7 (item b).

²⁷ See *supra* fn 2.

²⁸ KCC 21A.04.060(A).

²⁹ KCC 21A.04.060(B)(2).

³⁰ *Id.*

the Vashon Plan is supportive of farmer's markets, not food stores: "These policies aim to foster a more vibrant and ecologically-sound local food economy, including support for the Vashon Island Growers Association food hub and new farmer's market facility."³⁴ A retail grocery store such as that allowed by the proposed amendment would compete against such a food hub or farmer's market.

E. The Grange Amendment Will Have Significant Adverse Impacts That Must Be Assessed Via the State Environmental Policy Act

Considering that the Grange Amendment is specifically tailored to pave the way for Ms. Potter's 24-hour grocery store to replace the Vashon Grange Hall, consideration of adoption of this amendment must be preceded by full environmental review of the environmental impacts of allowing that new use on this property pursuant to the State Environmental Policy Act (SEPA), RCW 43.21C.030. The introduction of a new 24-hour grocery store into the RA 5 zoning will have significant adverse environmental impacts related to traffic, parking, noise, light, aesthetics, wildlife, drinking water, stormwater, fire hazards, steep slopes, land use, and more. The idea of allowing a grocery store that will be open all night, every night, seven days a week as a permitted use (not even a conditional use permit) into a rural residential neighborhood with no limitations not only violates state and local law and policies, but will also obviously cause significant adverse environmental impacts under SEPA. The County must conduct full environmental review of the impacts of allowing this use in the RA 5 zone.

F. Conclusion

Thank you for consideration of my comments. The proposed Grange Amendment must be rejected because it constitutes unlawful spot zoning and is inconsistent with state and local law and policies. At the very least, the County must conduct a full review of the environmental impacts of allowing SIC Major Group 54 – Food Store as a permitted use in the rural residential zone where it was previously prohibited outright.

Very truly yours,

BRICKLIN & NEWMAN, LLP

s/Claudia Newman
Claudia Newman

CN:pse

cc: Clients

³⁴ Vashon subarea plan at 7 (emphasis added).

Introduction and Day 1 topic for your review

Rick Shrum <rick.shrum@hotmail.com>

Thu 1/4/2024 3:39 PM

To:teresa.mosqueda@kingcounty.gov <teresa.mosqueda@kingcounty.gov>

Cc:Ginger Ferguson <gingerf99@live.com>

Bcc:Claudia M. Newman Henry <newman@bnd-law.com>;Michael Rea <rea@bnd-law.com>

📎 1 attachments (715 KB)

2023 11 13 Newman to Jensen.pdf;

Dear councilmember ~~Mosqueda~~, *Dunn*,

Hello. We welcome you to your new seat as our KC councilmember! We were able to "meet" and see you on your visits to the island (zoom is great) over the last year, congratulations on your win, you have our support. We are long time Vashon residents and love the island for its' past and exciting future.

This is also why we are contacting you: the future on Vashon, specifically on the North End of the island near the KC parking lots and ferry dock. In 2022, we contacted and worked closely and successfully with Joe McDermott's office opposing a rezoning change request for one parcel that went in front of the council (try #2 for the change as it turned out.) The request for non-conforming use (the property is zoned RA-5) had already been reviewed and rejected in the regular permitting process (try #1). We were not aware of this first change request, even though the property is right next door to our RA-5 properties. And, in fact, the building on the parcel is just 40 feet from the master bedroom in the house on our property (see picture at bottom of this email.) This subject property trying to re-zone used to be owned by the Grange and it also has a long history of land use violations and other problems particularly for its' neighbors. We are more than happy to share all the information we have uncovered either from living here or from FOI requests to the County. The properties bad actor behavior was with KC itself, land use violations that KC (Code enforcement) found its' own self (the sewer division) in violation of land-use laws, and they were forced to shut down at this location (2018). Just one example of several violations over the years.

We are quite confident that once and if the facts are known our position (the same one the county took the first time and the one the council took the 2nd time and the one our lawyers have said is correct according to many laws): do not re-zone this single parcel in this manner. Along with violating many (all of them really) land use laws, it is not fair to the neighbors or the community to impose the opportunity cost to the area by not addressing the bigger questions and changes needed to do this re-zoning the correct way. Why the requesting party and KC did not just try and do this change the right way is something we wonder and have our opinions on. We believe this should not be shortcut to the benefit of only one parcel (and KC benefits, another issue is the obvious conflict of interest in rezoning your neighbor), start and have a sub-area plan area study and figure out the bigger picture and opportunities and have a bigger vision that one provided by one person for their own benefit.

We felt strongly then and feel even more strongly now that this change is too narrowly focused (applies to just one parcel in all of KC) and would be limiting in the future as the area is studied and gets appropriate attention and community input. There is momentum on the island to have a community-based discussion on the Northend, the parking lots, the ferry dock, and surrounding properties. We would welcome your involvement and leadership on this. It is currently a no-person's land in terms of planning. And this proposed change also removes housing potential on Vashon without declaring as such and while touting housing as a priority. The property should and could be used for housing, it is zoned RA-5 currently so no changes to the KC code are necessary for that use and this clearly benefits the island not just one party.

After the first two failed efforts, the item came out of the council's trash bin and landed, earlier this year in the course of just days (and unknown to us) in the KC Execs 2024 Comprehensive Plan as a KC Code amendment proposal. The way it is implemented (as a specific exception, C30, in KC Code, see snips below), people on Vashon do not even know about it as it does NOT show up in any documents related to Vashon (there are several as you will come to know) and was not presented in any way that anyone other than the proximal neighbor perhaps would notice. And it would allow, if passed, and would only ever allow one parcel only to benefit and use the zoning change. This document was just transmitted to the council and is awaiting you taking your seat in January for review and acceptance in 2024 (as we are sure you know.) and the link is below.

The bottom line is, there are many, many good reasons to deny this zoning change, that is why it has been rejected 2 times so far. The attached document produced by our attorneys outlines in detail the legal reasons underlying the first two rejections and is what we ask you and the council to consider as the basis for a 3rd rejection of this effort. In addition, the way this change has come about deserves to see the light of day and to be reviewed. To provide a single parcel carve out and foist retail grocery into RA-5 Zone is very extreme and to do so for just one parcel is very questionable. You can see that the C30 definition (snip below), provides a "magic" line zoning overlay (across space, 1000 feet) for one old Grange that has many other options for use, including as a clubhouse which is what it has been historically and is currently used for. The reasoning provided, benefit to unused Granges in KC does not hold up as this is the only one that would be included and none of the other Granges knew about this effort.

The spot zoning change is also not warranted from a few other perspectives, one being that bad actor properties should not benefit over time. This is a demonstrable bad actor property and these actions (illegal land use) have been with King County in the past too which is another reason to shut this effort down. We are not lawyers but clearly there are several grounds for opposing and reversing any action that the Exec or council take on this matter everything from KC Master plan violations to just plain old bad idea, wrong way to do this. We have no interest in spending money on lawyers OR opposing our neighbors in what they want to do but we will take this as far as necessary and have already invested way too much time and treasure in this effort. We welcome the opportunity to have you on our side on this topic.

And to be very, very clear, we, the neighboring properties (2 parcel sharing 2 of the 4 sides of this property, the only other landowner abutting is KC itself) to the property that would be rezoned, DO NOT oppose development, or changes of zoning and land use in and around the north end of Vashon where this property is located. Maybe a few properties should be rezoned. Maybe there should be some specific allowance for density of housing in this area which is so close to transportation. This area is and has been a "no-persons" land in terms of attention, change and vision for the future and in fact is a great area to study and leverage with smart zoning changes and other actions that would enhance and support 1) housing 2) transportation options 3) some forms of commerce. We are strongly and consistently and with full throated effort opposed to the way that this parcel owner and KC have gone about this effort for change and how they are attempting to force this one parcel change in this no-persons land and to create an impediment to any larger scale vision or plan for the area.

Thank you and please accept our apology for having to introduce ourselves while bringing you into this issue with so many details! And we ask for your support in stopping this effort and, also, most importantly for the future of this area on Vashon, for your support in getting attention to this area, doing a sub-area plan study around the parking lots and ferry dock area instead of this one parcel, one private landowner spot zoning gift. There is a lot of goodwill for an effort like this on Vashon right now and we are part of that goodwill.

And if the neighbor (and Vashon) ends up with a grocery store at the end of the day, so be it, as long as there is a larger, more inclusive, and more widely beneficial set of changes for the context not a one parcel spot zoning gift out of context and out of legal bounds and with opposition of most neighboring properties. We ask you to oppose and stop the current effort, the third effort, by getting this KC zoning code change removed from the plan AND also ask for you to see if you can support an effort for and of the community to look a the

Northend of Vashon and KC parking lots and WA State Ferry dock area for how it can better serve the community in the future. To make a plan for that area's future. It is a very integral, the most integral location on the island yet remains a no-person's land and deserves this level of attention, study and focus from KC and the people on Vashon.

Rick Shrum and Ginger Ferguson
206.856.2994
206.661.7568

Our Properties (shown in snip below)

HOUSE 8887000655

10967 103rd Ave SW

Vashon, WA 98070

and

SHED 8887000770

10967 103rd Ave SW

Vashon, WA 98070

King County Exec Comp Plan Details

[King County Comprehensive Plan - King County, Washington](#)

This is where the one parcel zoning change is implemented, as a KC Code change.

NOTE: it is completely absent from where one would expect to see Vashon related changes. Also, we are going to the EIS meeting on the 18th to inquire why a single parcel carve out hiding in a KC Zone change would not require an EIS. BTW, this property is an Oso 2016 map overlay and has been identified as steep slope. To build or rezone or anything really without an EIS given this designation is a big risk and is one of the reasons perhaps it was rejected already.

[King County Comprehensive Plan - King County, Washington](#)

Executive Recommended 2024 King County Comprehensive Plan

[Proposed Ordinance \(King County Code amendments\)](#)  (2.3 MB)

This spot zoning single property carve out is implemented as a KC Code amendment. Here are snips of the relevant sections:

A. Retail land uses.

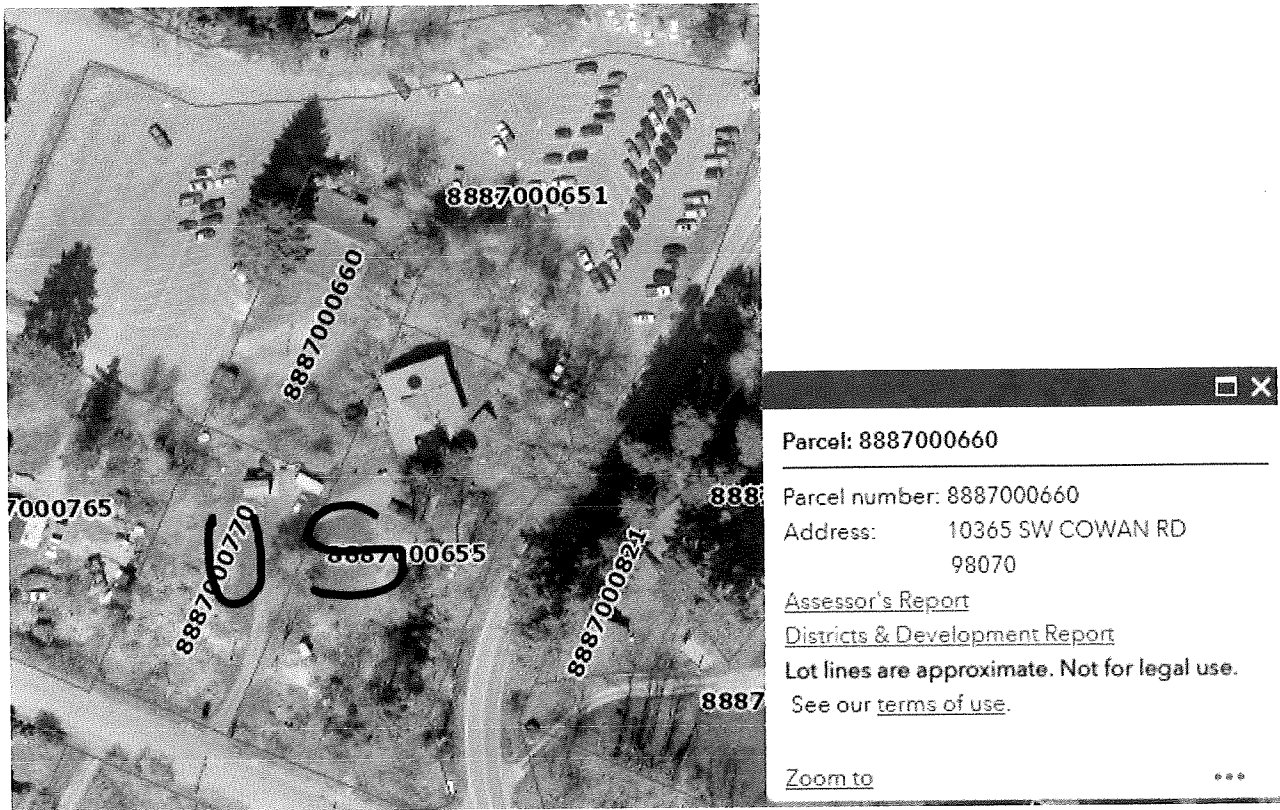
P-Permitted Use C-Conditional Use S-Special Use		RESOURCE			RURAL	RESIDENTIAL			COMMERCIAL/INDUSTRIAL				
SIC#	SPECIFIC LAND USE	A	F	M	RA	UR	R1-8	R12-48	NB	CB	RB	O	I (((30)))
*	Building Materials and Hardware Stores		P23						P2	P	P		
*	Retail Nursery, Garden Center, and Farm Supply Stores	P1 C1			P1 C1				P31	P	P		

*	Forest Products Sales	P3 and 4	P4		P3 and 4						P		
*	Department and Variety Stores						C14a	P14	P5	P	P		
54	Food Stores				<u>C30</u>		C15a	P15	<u>P31</u>	P	P	C	P6

30 Definition of C30. One parcel in the world fits this criteria or ever could fit this criteria, this is a spot zoning implemented in the KC code.

4718 30. Only within a former grange hall incorporated under chapter 24.28 RCW and
4719 listed in the National Register of Historic Places or designated as a King County landmark
4720 subject to K.C.C. chapter 21A.32 and if the parcel is located within one thousand feet of a
4721 Rural Neighborhood Commercial Center as designated by the King County Comprehensive
4722 Plan.

The Parcel in question:



From: [Carnation Community Alliance](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: 20240320-CCA Public Comment to KC LSLU Comm Mtg
Date: Wednesday, March 20, 2024 7:54:07 AM
Attachments: [20240320-CCA Public Comment to KC LSLU Comm Mtg.pdf](#)

Dear King County Clerk (or whoever is organizing this meeting),

Please see attached Public Comment from our organization.

Thank you for distributing to the Committee members and appropriate staff.

Have a great day,

Sincerely,

Jules Hughes
Carnation Community Alliance

From: [Deborah Hopkins](#)
To: [Carnation Community Alliance](#); [Constantine, Dow](#); [Chan, Jim](#); [Taylor, John - Dir](#); [KCC - Legislative Clerks \(Email Group\)](#); [Perry, Sarah](#); [Sullivan, Ted](#); [Mosqueda, Teresa](#)
Subject: Rural land use & character/Carnation/ large events
Date: Wednesday, March 20, 2024 2:55:15 AM

To whom it may concern, king county council and commissioners,

*With respect to LSLU Committee agenda– Briefing 5
- Chapter 3: Rural Areas and Natural Resource Lands
Opportunity for Public Comment – Remote and In-Person, please include this comment
in the meeting documents.*

It was very recently brought to my attention that a temporary use permit has been submitted for a concert venue designation at Carnation Farms in rural Carnation, WA. This surprises me as I am a client of a Carnation business that abuts this property, and I spend more than 20 hours a week at this property.

I am concerned that neighbors were not allowed sufficient voice in use of neighboring land for a purpose that will have significant impact on the environment and their livelihoods.

I would like to add my voice to the many voices that strongly oppose the incongruent use of rural lands for urban purpose here. Beyond the obvious environmental impacts, the stark safety concerns, and the loss of rapidly diminishing rural character is the hypocrisy in creating an Arts venue more than 40 min drive outside of Seattle. The venues in Seattle urban areas are already struggling to keep doors open post pandemic Just listen to KEXP for half a radio show and you will hear repeated call outs to support existing local music venues all around Seattle.

These events seem not to support a successful business plan unless you drastically increase scale. And increased scale is absurd with single lane roads and no other services to support it. Given that there are already area parks, the zoo and many urban private businesses devoted to these types of events it makes no sense to commit this rural and agricultural area to such a use.

In addition the development of such a site in Carnation would have big costs and very little benefit to the community. The proposed increase in visitors, vehicles, and noise pollution will disrupt wetlands and water tables, drive away wildlife, and destroy the culture of rural King County. Farm animals will be stressed. Wildlife viewing and hunting will be diminished. Flooding risk will increase. Planting cycles will be shifted. Do not let rural culture yet again be ignored in the pursuit of a fleeting and uncertain profit.

Please do not move forward with issuing this Temporary Use Permit. There is a vibrant and resilient community of people that live, work and recreate here. We count ourselves as part of a world that does not need or want the influx of Seattle Theater Group events and their aftermath.

*Best Regards,
Deborah Hopkins*

Deborah Hopkins, MS, MA

I acknowledge the original inhabitants of this place, the Sdohobsh (Snohomish) people and their successors the Tulalip Tribes, who since time immemorial have hunted, fished, gathered, and taken care of these lands. I respect their sovereignty, their right to self-determination, and honor their sacred spiritual connection with the land and water.

From: [Serena Glover](#)
To: [KCC - Legislative Clerks \(Email Group\)](#); [Perry, Sarah](#); [Zahilay, Girmay](#); [Mosqueda, Teresa](#); [Dunn, Reagan](#); [Rose, Terra](#); [Williams, Gabriela](#)
Subject: FoSV Testimony to LSLU Committee on Comp Plan Update for Event Centers
Date: Wednesday, March 20, 2024 10:36:05 AM
Attachments: [FoSV Testimony to LSLU Committee on Event Centers.pdf](#)

Hello,

Thank you for the opportunity to provide public testimony to the LSLU committee this morning on the Comp Plan Update. Please find attached a slightly more detailed written version of my striker amendment request for Event Centers.

Thank you,

Serena Glover
ED, Friends of Sammamish Valley (FoSV)
425-985-2992
GoFoSV.org

FOSV is also a member of Joint Rural Area Team

From: [MayIBorrowAPen](#)
To: [Mosqueda, Teresa](#)
Cc: [Legislative Staff, Council CompPlan](#); [Dembowski, Rod](#); [Zahilay, Girmay](#); [Perry, Sarah](#); [Barón, Jorge L.](#); [Upthegrove, Dave](#); [Balducci, Claudia](#); [Von Reichbauer, Pete](#); [Dunn, Reagan](#); [Bush, James](#); kcexec@kingcounty.gov
Subject: Proposed Drug Treatment Facility on Vashon Island
Date: Monday, April 1, 2024 11:42:43 PM
Attachments: [COUNTY EXEC EMAILS RE THUNDERBIRD.docx](#)
[PDF Change in Use Proposed VCC Building.pdf](#)
[2022lettertoKingCounty.ipq](#)
[2022letterfromCounty.ipq](#)

Dear Councilwoman Mosqueda -

First, congratulations on winning the election to represent Vashon on the King County Council.

I am writing on behalf of a large – and growing – group of Vashon residents comprised of mental health professionals, community activists, retirees, parents, and others, who are extremely concerned with the lack of public process and transparency surrounding the Thunderbird Drug Treatment Center, which is being proposed by the Seattle Indian Health Board (SIHB). After reading the information below, we hope to meet with you to discuss this matter in more detail.

Before I go into the reasons why this island cannot support the type of rehabilitation center being proposed, I want to stress that this community has shown itself to be incredibly supportive in terms of welcoming and sustaining social services for those who need help. A few examples, include:

- Vashon’s Interfaith Council works to feed and shelter homeless individuals on the island;
- The Vashon Health Care District is working to increase the availability of medical services that are woefully lacking here;
- Vashon Household is doing a terrific job of building low-income housing to help those who can’t afford to live here;
- Vashon Youth and Family Services is working hard to reduce the serious substance abuse prevalent on Vashon, as it is in so many rural communities; and
- Last but not least, the Dove Project works tirelessly to address the surprisingly large number of domestic violence cases here on the island.

These remarkable social service programs, which receive widespread community support, were established to help islanders who face very real problems. But the Thunderbird Drug Treatment Center will irreparably harm the island, its residents, and the patients they are charged with caring for – as we simply do not have the infrastructure to accommodate it.

The proposed location was spot zoned years ago when the community rallied for a facility for its elderly and disabled population, and opposed a similar proposed drug rehab at that time. In fact, community members contributed more than \$1.2 million dollars toward its construction back in 2001 (<https://www.seattlepi.com/seattlenews/article/vashon-residents-raise-1-2-million-to-save-a-1067898.php>). The one and only reason rezoning was allowed at that time was because of local community support for – *specifically and only* – the low impact use for long-term residential apartments for our elders and disabled who needed assisted living.

As I mentioned earlier, Vashon’s infrastructure and services cannot support or withstand the use by SIHB. And the patients, who are putting their trust into SIHB, will not have the best chance at recovery. As you are aware, we do not have reliable transportation on or off the island. Vashon has only two or three police officers assigned to protect a population of approximately 11,000 people at any given time. Our elderly and disabled residents are forced to go off island for any type of urgent medical care and would be forced to compete for life flights or emergency medical services with patients who will need them, too. Thunderbird would hurt those who live and work here by creating additional strains on our already troubled public transportation, public safety, social service and environmental

resources. The attached chart is a more comprehensive view of impacts the Thunderbird would have on the island community.

In September of 2022, before they bought the building, SIHB had a representative reach out to King County to ask if they would be permitted to run a drug rehab out of the Vashon Community Care building. They were told that could not operate in that building as it was zoned. But SIHB bought the building anyway. Ever since they've been trying to fit a square peg into a round hole.

The attached emails from Dow Constantine's Communications Specialist, James Bush, show that the County Department of Local Services Permitting Division does not approve of Thunderbird's proposed use as a drug rehabilitation center. As of March 26, 2024, Mr. Bush confirmed that neither the Local Services Department nor Comp Plan Manager ever received a request for a proposed change from the SIHB for the Thunderbird Rehab Center.

This leads our group of concerned residents to believe that the SIHB may be trying to bypass the normal review and public process by appealing directly to the County Council.

You should be aware that SIHB just submitted their application to the county a couple weeks ago. They are attempting to pass off their facility not as a drug treatment hospital, but simply as a community residential facility - something like low income housing. Based on consultation with mental health professionals, this is a grave mischaracterization given the needs of the individuals SIHB has communicated they intend to care for in the facility - like court ordered convicted criminals. This would put both patients and residents in danger, if they are approved as a CRF (community residential facility) as they would not be required by law to have 24-hour care. We all know that they are trying to open a residential treatment facility for drug addicts, and it should be treated as such, with required legal parameters for the safety of all. It appears they are trying to get any kind of permit so they can open their doors and then they will do whatever they want once they are inside.

On March 20, 2024, at a private meeting with only adjacent residents, SIHB let it slip that they may be doing detox in the future. I was not at the meeting, but you should meet with those who were. A resident, who took notes, reported to me that the group pressed the SIHB representatives about detox. They said they didn't have immediate plans but when pressed further, the response was quote, "But that doesn't mean we won't do detox in the future."

The people of Vashon have continuously been misled, manipulated and the tuned-in folks opposing the rehab have been intentionally controlled and silenced. For example, the last Vashon Community Council meeting was 30 minutes of pure propaganda for the rehab, followed up with clocked time for only 3 questions from residents, via a lottery system. Regardless of the illusion of this drug treatment center being supported by all islanders, the room was filled with people who oppose it, and who want to know the details.

And the details have been denied to all of us, including King County. In an email dated January 17, 2024 Jim Chan of King County code interpreter wrote, "*The consultants did reach out to me last month and we spoke about a code interpretation as a preliminary step. At that time, they were not prepared to share specifics on the project including description, scope, and location. They just wanted a general interpretation on Residential Treatment Facilities as exists in the code. They stated it may be controversial and were not ready to share specifics.*" This is clearly not meant to be a community residential facility.

Another example of how the community has been misled was through your predecessor. In the April 13, 2023 issue of our local paper The Beachcomber, they printed, "On the county level, [SIHB CEO] credited King County Councilmember Joe McDermott as having provided important support for the Health Board's plans." I sent Joe McDermott a copy of that article and his exact response was, "I have not advocated for the acquisition."

One of the PR slogans Thunderbird has repeated, "We haven't had a violent crime in 40 years." I have copies of past reviews from both patients and employees which indicate otherwise. And the health care expert I spoke to said that violent crimes are rarely reported to the police, instead they are filed as "incidents" within the files of the organization.

Councilmember Mosqueda, our group would very much like to earn your support in stopping this ill-advised project from being implemented on a rural island. Would you please meet with some of our group and drug addiction

mental health experts to learn of the actual facts that counter the carefully crafted drug treatment center PR slogans and misrepresentations?

Please feel free to call me at 310/980-2046 or email me and I will be happy to arrange a meeting with our group at your convenience.

Thank you in advance,

Katy Ballard

From: [ELIZABETH CIAPALA](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: FW: Comprehensive plan feedback
Date: Thursday, March 21, 2024 1:22:31 PM
Attachments: [Flood Control for Old Shake Mill Levee.eml](#)
[SnoVal-NE KC Community Needs List-ECT feedback.pdf](#)

Good afternoon, Per guidance from Councilmember Perry's office, please note my feedback on the documents related to the Comprehensive Planning initiative. If needed, I am happy to provide additional information or feedback on how difficult it is to navigate the different documents. My suggestion is to incorporate a "simplification initiative" within the planning process to make these documents digestible to any resident who needs to understand the guidelines.

Please do let me know if you have any questions would like more feedback on how to implement simplification work.

Thanks in advance, Elizabeth

From: Paige, Robby <Robby.Paige@kingcounty.gov>
Date: Wednesday, March 6, 2024 at 11:22 AM
To: ELIZABETH CIAPALA <ciapala@msn.com>
Cc: De Clercq, Danielle <ddeclercq@kingcounty.gov>, Lipsou, Penny <plipsou@kingcounty.gov>, Reynolds, Jesse <jesreynolds@kingcounty.gov>
Subject: RE: Comprehensive plan feedback

Hi Elizabeth,

Thank you for reaching out to Councilmember Perry to provide your feedback on the Comprehensive Plan process and to let us know about your priorities. We appreciate your sharing your concerns about the documents, including how they are organized and presented to the public. We agree with you wholeheartedly that the Comprehensive Plan could be easier to navigate and digest, and that as a public document that guides important policy for how our communities grow into the future, it should be accessible and inclusive. I would encourage you to provide this feedback directly to the Comprehensive Planning team by sending your comments to CouncilCompPlan@kingcounty.gov.

Regarding the Shake Mill levee project, I wanted to let you know that this was a King County Flood Control District project. The Flood Control District is a separate government from King County with its own Board of Supervisors (though the Board of Supervisors is comprised of King County Councilmembers). I should note that the project is not associated with the Comprehensive Plan or the Subarea Plan. That said, I wanted to pass along the email address of the Flood Control District Executive Director in case you are interested in providing this feedback on the project: michelle.clark@kingcounty.gov

Regarding the Subarea Plan, it looks like you are referring to the Community Needs List. Every 2-3 years, King County's Department of Local Services works with unincorporated area residents to identify the funding priorities for their communities, i.e. the Community Needs Lists. These lists are important for informing the planning and budgeting of King County's work in unincorporated King County. King County departments must identify which of their projects are related to the Community Needs Lists when they submit their budget requests to the King County Council. These Community Needs Lists inform the Subarea Plan, which is a guiding document that establishes the 20-year vision for the community (in this case, the Snoqualmie Valley/NE King County community). This list of priorities is community driven and there is an extensive process to engage the local community to help inform the list of project and funding priorities. I am cc'ing the Interim

Director of the Department of Local Services, Danielle DeClerq, who helped to manage the process around the Community Needs Lists, so she can get back to you directly about how you can provide your feedback on the list and participate in the future. She can also describe the community outreach process in a bit more detail to provide a better understanding of how this list is compiled. I hope this information helps. We appreciate hearing from you!

Sincerely,

Robby

Robby Paige

Legislative Aide

Councilmember Sarah Perry

King County Council, District 3

206-445-9246

From: ELIZABETH CIAPALA <ciapala@msn.com>

Sent: Wednesday, February 28, 2024 2:48 PM

To: Perry, Sarah <Sarah.Perry@kingcounty.gov>

Cc: ELIZABETH CIAPALA <ciapala@msn.com>

Subject: Comprehensive plan feedback

Good afternoon, Councilmember Perry, Nice to meet you virtually. I wanted to provide some feedback on the Comprehensive planning process and priorities. I am a 28-year resident of King County, currently residing in North Bend, RKC. Our address is 43302 SE 92nd Street, North Bend 98045.

I have spent a considerable amount of time reading through the previous plan(s) and some of the proposed updated plan(s). As a newcomer to these documents, I wanted to share it's difficult to follow progress through the many PDF documents. A suggestion might be to take on a "Simplification Initiative"—remove any superfluous language, name PDF files with more detail for searching, group and link ordinance documents so amendments or updates are easy to find, etc. A random data point: I have clicked 643 links on the website to find information related to the plan, roads, flooding, and I still don't know if I have all the latest information.

Onto my other feedback. I am attaching an email I sent regarding the Shake Mill levee project, which unfortunately was a complete failure. The riverbank has eroded significantly and will continue. The erosion is also causing damage to the road bridge. I have searched, but not found any initiatives to fix the failed levee which either wasn't executed correctly or was the wrong solution.

I don't quite understand the consideration criteria for the subarea plans. The projects listed in the subarea plans do not seem like a 10-year vision vs. tactical repairs. It would be helpful to know how a project is nominated for consideration. Do these projects roll-up into the broader KC Plan as many are transportation related and many projects are already outlined in that plan. In the attached SnoValley sub-area PDF I've added feedback using the comments feature in Acrobat. Many of my comments are related to road maintenance, usage, and safety.

Thank you for your time and service. Please reach out if you have any questions or require additional detail.

Regards,

Elizabeth Ciapala-Thompson

From: fallcityday@gmail.com
To: [Legislative Staff, Council CompPlan](#)
Cc: [Reynolds, Jesse](#); [Perry, Sarah](#)
Subject: Fall City SDO-260 et al
Date: Tuesday, March 19, 2024 5:21:23 PM
Attachments: [image001.png](#)
[FallCity_SubareaCommittee_AppendixB_11012022.pdf](#)
[FallCity_SubareaCommittee_Recommendations_11012022.pdf](#)
[NEKC_CommentHandouts2_03072024.docx](#)
[NEKC_CommentHandouts_03072024.docx](#)

Good afternoon,

Enclosed are copies of the exhibits and comments made at the March 7th, 2024 LSLU Public Meeting on the proposed comp plan and NEKC Subarea Plan.

Additionally, I've included a copy of the November 2022 recommendations made by the Fall City Subarea Steward Committee, submitted to the Executive on the proposed NEKC Subarea Plan, Comp Plan, scoping, map amendments and accompanying code.

Lastly, Can you please direct me to the proposed amendment Fall City's Business Special District Overlay in the upcoming plan update? Here is a link to the current ordinance: <https://kingcounty.gov/en/legacy/depts/local-services/permits/property-research-maps/property-specific-development-conditions/SDO/SO-260.aspx>

Specifically, on behalf of the Fall City Community, I need to ensure the three recommendations are included in the LSLU review process. The most substantive item is Automotive Repair & Service business **shall be included** under the allowable use under general services. This is an *essential business* to our rural town.



Angela Donaldson
Fall City Community Association
Subarea Steward Chair
425-770-8355

From: [Tim Trohimovich](#)
To: [Legislative Staff, Council CompPlan](#); [Compplan](#)
Subject: Comments on King County Comp Plan update Chapter 3 Rural Areas & Natural Resource Lands
Date: Tuesday, March 19, 2024 5:51:17 PM
Attachments: [image001.jpg](#)
[image002.gif](#)
[image003.png](#)
[2024-03-19 FW Comments Ord 2023-0440 Rural Element 2024 King Cnty Comp Plan Update.pdf](#)

Dear Council Members and Staff:

Enclosed please find Futurewise's comments on the Proposed Ordinance 2023-0440 – 2024 King County Comprehensive Plan update Chapter 3 Rural Areas and Natural Resource Lands. Thank you for considering our comments.

If you require anything else, please contact me.

[Tim Trohimovich, AICP \(he/him\)](#)
Director of Planning & Law



Futurewise
1201 3rd Ave #2200, Seattle, WA 98101
(206) 343-0681
tim@futurewise.org
futurewise.org
connect:

From: [Leila and George Gonzalez-Rigatto](#)
To: [Legislative Staff, Council CompPlan](#)
Cc: [Leila Gonzalez-Rigatto](#)
Subject: King County CAO 2024 Update
Date: Tuesday, April 2, 2024 5:12:30 PM

Hello,

Please, I request the Council to adopt the guidance provided by the WA State Department of Ecology published back in 2022 - incorporating BAS, which exempts low functioning Category IV Wetland of going through a mitigation sequencing process and opting immediately for a compensatory fee or credit.

Pursuant to WA State Department of Ecology (Department) Wetlands Guidance for Critical Areas Ordinance (CAO) Updates, published on October 2022, the Department proposed the adoption of an exemption process for certain low functioning Category IV wetlands. This would provide a better protection and certainty of improvement of more high functioning wetlands (categories I, II, and III) by preventing a net loss of wetland function.

After revising the proposal for updating the King County CAO submitted on March 1, 2024, I could not find any reference about adopting the guidance supra referred, which is informed by BAS and aim to provide a more uniform approach to wetlands across WA State. This also would be a more equitable approach to landowners within King County. In the same regional area, depending on the municipality boundaries, 3 neighboring lots may have to go to 3 different process, producing very inequitable result for the landowners.

Multiple municipalities and counties provide certain exceptions for Wetlands Category IV depending on its size varying from 1,000 sq ft to 5,000 sq ft. I believe, the size is not as relevant as the function. King County implemented the 2,500 sq ft mitigation sequence exception, but as stated by the Department, sq footage is not based on BAS.

This approach would (1) avoid further growth beyond the already established urban growth area, (2) increase housing, and (3) decrease investment in public transportation and utilities to serve far distant residences that keep encroaching on high functioning pristine wetlands.

Respectfully,

Leila Gonzalez-Rigatto

From: [Joe & Elizabeth](#)
To: [Dunn, Reagan](#)
Cc: [Eccles, Cody](#); [Kremen, Jordan](#); [Jensen, Chris](#); [Legislative Staff, Council CompPlan](#); [Auzins, Erin](#); [Jimenez, Warren](#); [Hodson, Doug](#); [Perry, Sarah](#)
Subject: RE: King County Comprehensive Plan
Date: Monday, March 25, 2024 7:03:46 PM
Attachments: [Reagan Dunn"s response to Joe Miles 02-08-2024.pdf](#)

Councilmember Reagan Dunn-

Pursuant to our discussion in February, regarding the Comprehensive Plan and future Park Levies (see attached), I propose the following new Comprehensive Plan Policy for Chapter 7 Parks:

The King County Parks Levy Oversight Board, comprised of citizen representatives from all Council Districts, shall review and provide comments on all future Park Levy proposals prior to adoption, with a detailed focus on equity and social justice, to ensure priority funding is directed to underserved communities.

Please contact me if you have any questions.

Joe Miles

(425) 523-5275

From: [Auzins, Erin](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: FW: MIT Fisheries Comments on King County Comprehensive Plan Update
Date: Thursday, March 28, 2024 2:06:10 PM
Attachments: [MIT Fisheries Comments on King County Comprehensive Plan Update 03.27.2024.pdf](#)

From: Nancy Rapin <NRapin@muckleshoot.nsn.us>

Sent: Thursday, March 28, 2024 2:05 PM

To: Auzins, Erin <Erin.Auzins@kingcounty.gov>

Cc: Smith, Megan (DNRP) <Megan.Smith@kingcounty.gov>; Isabel Tinoco <Isabel.Tinoco@muckleshoot.nsn.us>

Subject: MIT Fisheries Comments on King County Comprehensive Plan Update

Hi Erin,

Please see our attached comments on the 2024 King County Comprehensive Plan Update.

Thank you,

Nancy Rapin

Lead Fisheries Habitat Scientist

Muckleshoot Tribe Fisheries Division

39015 172nd Avenue SE

Auburn, WA 98092

(253) 876-3128

From: [Brian](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: 2024 Comprehensive Plan
Date: Friday, March 22, 2024 2:56:19 PM
Attachments: [image001.png](#)
[image002.png](#)
Importance: High

Hello,

I am an owner of 5 acres zoned as RA-5 with private well in unincorporated King County. The majority of my neighbors have shared well & smaller parcels. Can I request that my parcel be included in this new King County Comprehensive Plan to be rezoned as R-1. This will allow for both growth & preservation of the area. My well will be split amongst the 5 properties.

Please advise. Thank you.

Brian Poggioli, parcel 0622079093

pogg75@hotmail.com



From: [Mark Rettmann](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: Comments on King Co. Critical Area Ordinance for 2024
Date: Tuesday, March 26, 2024 1:15:41 PM

Applicants have had significant challenges with King County Department of Local Services (DLS) for over 15 years. Under existing code, DLS has refused to allow applicants to use a section of the current code that reduces mitigation ratios (if certain performance conditions are met) rather than apply “permittee-responsible mitigation ratios” to users of mitigation banks (banks). Banks meet all of the requirements for reducing mitigation ratios under the current King County code, but staff have refused this option to applicants saying recently to a government applicant that “banks aren’t best available science”. Under the new updated code proposal, the ratio reduction section has been completely eliminated and no bank specific language has been included. This is contrary to what King County staff had said that they would do under this update.

For some reason it seems that DLS staff have an adversarial and ideological opposition to mitigation banks or don’t understand them. DLS staff have refused meetings and code interpretations and refused any kind of common-sense approach to the reality that banks are apples and oranges different to permittee responsible mitigation, and, far superior for achieving no net loss, temporal loss, and reducing risk and failure, compared to typical permittee responsible mitigation projects. While King County has seen a high increase in failure in permittee-responsible mitigation projects they have not added any kind of clarification or direction for applicants to be able to use a mitigation bank, consistent with the intent of how banks operate, the rigor of the State and Federal mitigation bank program, guidance from Ecology on compensatory mitigation, alternative mitigation, or even best available science (BAS) updates. It appears that King County is arbitrarily picking BAS elements to increase typical mitigation ratios, made inaccurate or inappropriate equivalences between off-site mitigation and on-site mitigation reasons for failure, and completely left out the benefits of mitigation banking and code language related to alternative mitigation options.

Mitigation banks are more generally successful than permittee-responsible mitigation and provide predictable, cost-effective, and timely improvement to ecological functions, while supporting responsible and efficient development activities. Mitigation banks are an important component of Washington’s sustainable growth and ecosystem recovery. Wetland Mitigation Banking is the preferred form of mitigation in the Federal Rule on Compensatory Mitigation for Losses of Aquatic Resources (33 CFR Parts 325 and 332). Banks are a consolidated form of mitigation, whereby the bank sponsor receives agency review and approval of the mitigation site in advance of credit release. Once approved by the agencies, credits become available based on the ecological success of the bank site. Mitigation banks are prioritized in the Mitigation Rule as the best mitigation

option because they provide successful, predictable, cost-effective, and timely improvement to ecological functions, while supporting responsible and efficient development activities.

Alternative mitigation options like advance mitigation and mitigation banks have evolved specifically to reduce failure and improve no net-loss outcomes because onsite mitigation is generally difficult and ineffective. King County should adopt code recognizing mitigation banks as BAS and consistent with State and Federal guidance recognizing mitigation banks as the preferred mitigation approach which is similar to most other local jurisdictions in WA.

Mark

From: [Mark Rettmann](#)
To: [Legislative Staff, Council CompPlan](#); [Legislative Staff, Council CompPlan](#)
Subject: Comp Plan Comments
Date: Friday, March 29, 2024 8:02:50 PM

Please see below for additional comments on the comp plan.

Mark

1. Offsite wetland buffer mitigation ratio is being raised from 1:1 to 2:1. No emphasis on the value of type, quality, location of impacted buffer and/or buffer mitigation actions. One reference to being able to use a mitigation bank for buffer mitigation but only within the “sub-basin” not the watershed or service area. Mitigation bank use should be based upon watershed and the bank service area, whichever is larger.
2. Riparian buffer mitigation ratio is being raised from 2:1 to all higher ratios now based on stream type. It should remain the same.
3. Some of the standard ratios in the mitigation table (what are concurrent, permittee responsible mitigation ratios) have been increased for certain wetlands. However, no mention about the difference of mitigation banks and permittee responsible mitigation ratios, thus they would still be applying these ratios to mitigation banks and advance mitigation when these alternatives offer more ecological advantages.
4. Wetland ratio reduction criteria has been completely taken out. Previously, because a mitigation bank meets all of these criteria by definition many have advocated that this code should be applied to banks. However, it appears it has been removed completely.
5. No new language on alternative mitigation options (advance mitigation and mitigation banks based on best available science from Ecology, Corps, EPA etc.)
6. No language on preference or priority of mitigation actions (reestablishment, creation, preservation, enhancement) to combat no net-loss, or higher monitoring standards etc for PRM. Instead, the proposal increases ratios for general “mitigation” which is not best available science.
7. No acknowledgement or support for the benefits of alternative mitigation (advance, banks, etc.) to prevent no net-loss. This must be incorporated into the code, not removed or ignored.

From: [Auzins, Erin](#)
To: julieseitz.js@gmail.com
Cc: [Legislative Staff, Council CompPlan](#)
Subject: FW: Automatic reply: How long?
Date: Friday, March 29, 2024 8:35:49 AM

Hi Julie,

Currently, the Comprehensive Plan is in the Local Services and Land Use Committee. The Committee is expected to vote on June 5th.

The Full Council public hearing won't occur until November 19th, in order for the Executive to complete the Final Environmental Impact Statement. That will be the final opportunity to provide public comment on the Plan.

Erin

From: Rose, Terra <Terra.Rose@kingcounty.gov>
Sent: Friday, March 29, 2024 8:33 AM
To: Auzins, Erin <Erin.Auzins@kingcounty.gov>; Tracy, Jake <Jake.Tracy@kingcounty.gov>
Subject: FW: Automatic reply: How long?
KCCP Q that went to the Clerk's box...

From: Hay, Melani <Melani.Hay@kingcounty.gov> **On Behalf Of** Clerk, King County Council
Sent: Friday, March 29, 2024 7:43 AM
To: Rose, Terra <Terra.Rose@kingcounty.gov>
Subject: FW: Automatic reply: How long?

Hi Terra,

Would this question go to you?

Melani

From: Julie Seitz <julieseitz.js@gmail.com>
Sent: Thursday, March 28, 2024 4:47 PM
To: Clerk, King County Council <Clerk@kingcounty.gov>
Subject: Fwd: Automatic reply: How long?

Hello, we asked a question below. Can you answer?

“Hello, how long do we have before the public comments opportunities will close and the council votes? Thank you.”

----- Forwarded message -----

From: **Legislative Staff, Council CompPlan** <CouncilCompPlan@kingcounty.gov>
Date: Thu, Mar 28, 2024 at 4:45 PM
Subject: Automatic reply: How long?
To: Julie Seitz <julieseitz.js@gmail.com>

Hello,

Thanks for reaching out to the King County Council and your interest in the County's 2024 Comprehensive Plan update. Your comments have been received and will be shared with all Councilmembers. If you have asked a question about the update process, a member of the Council's staff will reach out to you shortly. Other comments may not receive a response but will be given to Councilmembers for their consideration.

If you would like to be added to the Comprehensive Plan email list to stay up to date on planning news and project milestones, please click [here](#).

More information on the Council's review of the 2024 Comprehensive Plan can be found at <https://kingcounty.gov/en/dept/council/governance-leadership/county-council/topics-of-interest/comprehensive-plan/2024>.

Thank you!

Council staff

Request language assistance in አማርኛ, العربية, 简体中文, 繁體中文, 한국어, Русский, Soomaali, Español, Tagalog, Українська, or Tiếng Việt by calling (206) 477-9259 or emailing tera.chea2@kingcounty.gov.

Request language assistance in Amharic, Arabic, Chinese, Korean, Russian, Somali, Spanish, Tagalog, Ukrainian, or Vietnamese by calling (206) 477-9259 or emailing tera.chea2@kingcounty.gov.

From: [David Vogel](#)
To: [Legislative Staff, Council CompPlan](#)
Cc: [David Vogel](#); [Diane Emerson](#); [Jensen, Chris](#)
Subject: Vashon Town Plan Committee Proposal
Date: Saturday, March 30, 2024 11:32:02 AM
Attachments: [Screenshot 2024-03-04 at 10.22.30 PM.png](#)

People,

On March 21, at the general meeting of the Vashon-Maury Community Council, the Vashon Town Plan Committee made the following motion, to be voted on at the next general meeting on April 18th:

"The Vashon Town Plan Committee recommends that the current Executive proposal, which gives density bonuses in Vashon Town exclusively to affordable housing be changed as below:

NEW SECTION. SECTION 23. There is hereby added to the chapter established in section 21 of this ordinance a new section to read as follows:

B. New or substantially improved residential or mixed-use developments shall provide affordable dwelling units, and may exceed the base density allowed in the zoning classification, in accordance with the standards listed below.

Screenshot 2024-03-04 at 10.22.30 PM.png

The Committee further recommends that the height restriction be changed from 35 feet to three stories."

King County and the Vashon community have made it clear that affordable housing in the Town of Vashon is a priority, but the current Executive proposal would limit density bonuses in Town to 100% affordable housing developments, and would limit the height of development to 35 feet.

Building 100% affordable housing developments in the Town of Vashon would not be feasible for private developers, and it would prevent the integration of affordable housing units with market rate housing. These goals would be better achieved by modifying the Executive proposal to incorporate the same density bonuses proposed in other Rural Towns in King County, without the use of TDRs, and with two modifications.

First, we would allow density bonuses for developments with 9 or fewer units, because the Town of Vashon comprises a small area where smaller developments should be encouraged.

Second, the greatest present housing need on Vashon is for the people who work on the Island, such as teachers, clerks and other workers whose incomes fall within the 80-120% AMI range. The Town Plan Committee's proposal would allow density bonuses for owner occupied units in the 80-120% AMI range (as opposed to 80% AMI), and would allow density bonuses for any combination of 80-120%AMI (Owner) (as opposed to 80% AMI), and 60% AMI (Rental). These modifications should make it easier to provide this much-needed middle income housing.

Limiting the height of construction to 35' would make it very difficult to build three-story mixed use developments, which are a much less expensive way to create affordable housing. Allowing three stories provides more flexibility to developers (including the placement of HVAC on the roofs of structures), while limiting building heights to acceptable levels.

This proposal, which has the unanimous support of the VMCC's Town Plan Committee, will be voted on by the VMCC at its April 18th general meeting.

David S. Vogel, Chair, Vashon Town Plan Committee
Phone: (206) 291-7494
Fax: (206) 219-6686
email: dsvogel.atty@gmail.com

From: [Drochak, Terry](#)
To: [Legislative Staff, Council CompPlan](#)
Cc: [Storarr, Jeff](#); [Kenna, Matthew](#); [Nelson, Maxwell](#); [Buis, Susan](#); [Riedmayer, Jennifer](#)
Subject: WSDOT comments on the current draft of proposed revisions to King County's Critical Area Ordinance
Date: Friday, March 29, 2024 11:13:30 AM
Attachments: [WSDOT_KC_CAO_Comment20240329.pdf](#)

Dear King County Council,

The Washington State Department of Transportation (WSDOT) appreciates the opportunity to review and comment on the current draft of proposed revisions to King County's Critical Area Ordinance (CAO). WSDOT offers the following comments and recommendations on the current draft of proposed CAO revisions—comment letter is attached to this email.

Thank you for the opportunity to review and comment on the current draft of the proposed revisions to King County's Critical Area Ordinance (CAO).

Terry

Terry Drochak - (He/Him)

Environmental Compliance Solutions Branch Manager

Washington State Department of Transportation

Cell: 360.628.1007

Email: Terry.Drochak@wsdot.wa.gov

From: [Michelle Bates](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: Vashon Heights Grocery
Date: Thursday, April 4, 2024 11:34:29 AM

I can't wait for the old Grange Hall to become alive again as Heights Grocery! Small, locally owned businesses are the lifeblood of communities. This one in particular will provide critical commodities, a community gathering space for a neighborhood that has none, resilience in the face of emergencies (from icy winter storms to earthquakes), and island jobs. The location is accessible by foot from probably the biggest concentrated population on the island (5 miles from town center and the main grocery store), and there is plenty of parking as well. Jennifer Potter is a stalwart member of the community, dedicated to providing for the community and making it a good time for everyone involved. She has put years of effort and money into securing this building, taking care of it (an island landmark), making it accessible for use in whatever ways are allowed, and she will be a stellar business owner. Please do what it takes to make Heights Grocery a reality! Vashon will thank you for it...

Michelle Bates
Vashon Island
206-795-3054

From: [Fran Brooks](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: Vashon Heights Grocery aka the old Vashon Grange
Date: Thursday, April 4, 2024 11:38:39 AM

To Whom it may concern:

The old Grange has served in bringing together this community over decades and we need it to continue in that vein. By providing grocery items and social space, it fills a critical role that is otherwise unavailable to residents within 5 miles of the venue. There is no compelling reason to restrain the opening of this business unless the aim is to cripple the owners and the community that supports them. I urge you to allow the business to proceed immediately.

Dr. Fran Brooks
206-228-2996

Neighbor and
Senior Center Village Manager (supported by King County VSHSL)

From: [Ture Brusletten](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: Re-zoning the Vashon Grange Hall
Date: Thursday, April 4, 2024 12:38:52 PM

To Theresa Mosqueda and the King County Council,

I am writing to urge the KCC to support and fully carry out the Re-zoning required to open a Heights Grocery Store in the historic Vashon Grange Hall. One thing I love about the owner's vision is that it honors and acknowledges the decades of historical and functional use of this building and space. It would be really sad if the building were either left, unused and abandoned, or demolished in favor of some concrete office park. The owner is not stopping at, or leaning on, the history piece, however.

The proposed plan for a grocery store/coffee shop answers so many functional and practical needs. Basic groceries for people living on the Northend of the island, commuting home, who won't pass through town. For people close enough, it's an option to pick up some essentials without driving - burning car fuel, joining the fray of car/ferry traffic. And finally, it's community. The intimate size, the coffee shop, etc, without the challenging parking situation down at the dock, will provide a Northend hub. The hub will promote all kinds of positive communal support. People talking, people helping one another (kids picking up eggs/bread for elderly neighbors, on foot), networking to solve problems, etc. Studies of the people who live longest show they live in communities where interdependence, inter-reliance are a mainstay. This grocery store/coffee shop would promote this.

Please consider!

Respectfully,
Ture Brusletten

From: [Laura Cherry](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: Heights Grocery
Date: Thursday, April 4, 2024 11:43:11 AM

To Whom It May Concern,

I am writing to let you know that, as a resident and community member of Vashon Island, I strongly support Jennifer Potter and her team in their proposal to renovate the old Grange Hall into a small grocery for our north end island neighbors. I believe this project is a fantastic way to restore that historic property, and provide a very much needed resource for the island, for the north end community in particular, as well as the many islanders that pass through that area on their way to and from the island.

My understanding is that this project would require some changes to the zoning for the parcel. I sincerely hope that this rezoning is incorporated into the upcoming comprehensive plan changes, so that this project can move forward.

Regards,
Laura

Laura Cherry (she/her)
206.724.3723
laura@dragonsheadcider.com

Dragon's Head Cider Uptown
9815 SW Bank Road
Vashon, WA 98070

Dragon's Head Cider (Orchard location)
18201 107th Avenue SW
Vashon, WA 98070

From: [Tom DeDonato](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: RE: 2024 King County Comprehensive Plan
Date: Wednesday, April 3, 2024 2:45:22 PM

More input from one of my partners:

“I think we need to discuss actual COSTS and not ratios. Ratios sound easy but the actual cost is astounding and they need to know what the numbers for mitigation actually are!”

Tom

THOMAS J. DEDONATO
(425) 417-3455

P.S. I AM MOVING MY EMAIL FROM DEDONATOGROUP TO GMAIL, SO PLEASE USE GMAIL FROM NOW ON.

From: Tom DeDonato [mailto:tomdedonato1@gmail.com]
Sent: Wednesday, April 03, 2024 2:35 PM
To: CouncilCompPlan@kingcounty.gov
Subject: 2024 King County Comprehensive Plan

Hello -

I am told that King County has just proposed updates to their critical area code in the Comprehensive Plan for 2024. The changes include increasing all ratios for mitigation and making it more difficult to do offsite mitigation. This is contrary to guidance from most other agencies and is not practical. I am involved in a few projects for which onsite mitigation is being required. In some of these cases it is not practical and in our opinion is overkill based on the low quality of the onsite sensitive areas. In one case the County is requiring offsite mitigation through the King County Reserves Program at arbitrary and unreasonable ratios. We are trying to counter that with a reasonable offer through another mitigation bank that does not cover that area but in which case we requested an exception.

We are not against keeping the planet green, but do want a realistic, reasonable, efficient approach on wetland mitigation which does not eliminate the motivation to create additional lots for housing.

If you would like this in letter form, please let me know.

Thank you.

Tom

THOMAS J. DEDONATO
(425) 417-3455

P.S. I AM MOVING MY EMAIL FROM DEDONATOGROUP TO GMAIL, SO PLEASE USE GMAIL FROM NOW ON.

From: [Tom DeDonato](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: 2024 King County Comprehensive Plan
Date: Wednesday, April 3, 2024 2:34:45 PM

Hello -

I am told that King County has just proposed updates to their critical area code in the Comprehensive Plan for 2024. The changes include increasing all ratios for mitigation and making it more difficult to do offsite mitigation. This is contrary to guidance from most other agencies and is not practical. I am involved in a few projects for which onsite mitigation is being required. In some of these cases it is not practical and in our opinion is overkill based on the low quality of the onsite sensitive areas. In one case the County is requiring offsite mitigation through the King County Reserves Program at arbitrary and unreasonable ratios. We are trying to counter that with a reasonable offer through another mitigation bank that does not cover that area but in which case we requested an exception.

We are not against keeping the planet green, but do want a realistic, reasonable, efficient approach on wetland mitigation which does not eliminate the motivation to create additional lots for housing.

If you would like this in letter form, please let me know.

Thank you.

Tom

THOMAS J. DEDONATO
(425) 417-3455

P.S. I AM MOVING MY EMAIL FROM DEDONATOGROUP TO GMAIL, SO PLEASE USE GMAIL FROM NOW ON.

From: [Sasha Elenko](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: In Support of Heights Grocery
Date: Thursday, April 4, 2024 12:44:26 PM

Hello,

I was born and raised right up the hill from the old Grange building. I cannot overstate how much a grocery store would benefit the neighborhood. It would be far more preferable to do my grocery shopping a short walk away in our beautiful neighborhood rather than driving ten minutes to Thriftway.

In addition the Grange is an incredible, historic building that has lurked in the shadows for too long. It is long past time that this building be put into the service of our community. The Wild Mermaid provides an excellent case study in the value of revitalizing the few remaining historic buildings on Vashon. These buildings are not "preserved" in any meaningful sense by being left vacant.

Please allow our neighborhood to become the vibrant community that it can and should be. There is no course of development more natural and healthy than this.

Sasha Elenko, lifelong neighbor
(206)369-2638

From: [Katy Ellis](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: Heights Grocery
Date: Thursday, April 4, 2024 12:07:51 PM

Hello,

I am writing to seek your approval of Heights grocery store at the Old Grange location on the north end of Vashon Island. I live nearby and would love to have a walkable grocery store by our house. It would be a resource for the community, and could draw more tourists to the area who could walk off the boats , and this would help save gas and pollution. This could also be a wonderful gathering spot for the community. Please consider this request and thank you for your time.

Katy Ellis

206-934-9027

Sent from my iPhone

From: barneydgill@mail.com
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: Vashon Island Heights Grocery Store
Date: Thursday, April 4, 2024 11:29:14 AM

Please allow this grocery store to move ahead! Having a small grocery store on the north end of Vashon would be a great addition to the community.

Having this available would save the five mile drive to town to get last minute or forgotten items. It would be so great (for my body and the environment) to eliminate these drives in a car!

Barney Gill
10525 SW Cowan Rd
Vashon WA 98070
206-579-5861

Sent using the free mail.com iPad App

From: [Hannah Ink](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: Vashon North End Zoning
Date: Thursday, April 4, 2024 11:43:19 AM

Dear King County & Rep. Mosqueda,

Please accept this note as my formal comment for tonight's meeting regarding the Vashon Comprehensive Plan:

As a resident of the Island's North End, I, like my neighbors, spend considerable time, gas and fossil fuel emissions going to Vashon town for quick grocery runs, meetings, and social engagements. The Grange Hall is an historic location that has been repurposed and preserved as a meeting, rehearsal and even theatrical venue. As a grocery store and gathering place, it will serve the Island even better by reducing our currently outsized carbon footprint and amplifying our neighborhood cohesion. Please do all you can to make Heights Grocery a reality.

Thank you,

Susan McCabe, Principal

Hannah, Ink

206-852-3942

Putting your best ideas into words that work

From: [Tami Brockway Joyce](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: Vashon Grange
Date: Thursday, April 4, 2024 11:49:34 AM

Hello, King County!

I write to you as a 3rd generation Vashon Islander urging you to support bringing community back to the old Grange Hall on the north end of Vashon. That great old building brought people together for decades. By allowing this historic place to become a grocery and coffee shop you will breathe new life into the building and the neighborhood. Please help remedy this food desert and revive this once lively gathering place for neighbors by approving this project!

Sincerely,
Tami Brockway Joyce

From: [Dan Kopsak](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: Vashon Heights Grocery
Date: Thursday, April 4, 2024 11:32:49 AM

Hi there,

PLEASE, PLEASE rezone the building on the North End of Vashon so Jennifer can finally open up the LONG awaited Heights Grocery.

It would definitely be a positive use of the building and would help support the North End community. It would also serve as a great stop going to and leaving the ferry parking lot.

All wins to an otherwise unused building

Please make this happen - they have waited far too long!!!

North Ender of Vashon,
Danny Kopsak

From: [Lisa Lenihan](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: Heights Grocery Vashon
Date: Thursday, April 4, 2024 1:16:44 PM

Dear committee members,

I have lived on the north end of Vashon Island for nearly 30 years. Allowing the Heights Grocery to become a neighborhood grocery store would add immense value the north end neighbors and commuters that park nearby. Please consider approving Heights Grocery!

Lisa Lenihan
Vashon Island

From: [Jennifer Loomis](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: The Grange
Date: Thursday, April 4, 2024 11:41:57 AM

I am writing in support of Vashon Island's Grange. As our island grows ever more populous, we need to have a small local grocery store at the north end. The old Grange has served in bringing together this community over decades and we need it to continue in that vein. By providing grocery items and social space, it fills a critical role that is otherwise absent within 5 miles of the venue.

Thank you for your consideration.

Jennifer Loomis
Vashon Island resident

From: [mary marin](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: Vashon Grange / Grocery Store
Date: Thursday, April 4, 2024 11:48:31 AM

Please help us enhance our neighborhood experience on Vashon.

The old Grange has served in bringing together this community over decades and we need it to continue in that vein. By providing grocery items and social space, it fills a critical role that is otherwise absent within 5 miles of the venue....

Thank you,
Mary Marin

From: [Linda Martinez](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: Vashon Grocery/Grange
Date: Thursday, April 4, 2024 12:47:27 PM

Please help us enhance our neighborhood experience on Vashon.

The old Grange has served in bringing together this community over decades. We need it to continue in that vein. By providing grocery items and social space, it fills a critical role that is otherwise absent within 5 miles of the venue....

Sincerely,

Linda Martinez
206-612-4614

From: [Libby McCullagh](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: Vashon heights grocery
Date: Thursday, April 4, 2024 11:36:22 AM

Hello,

I am writing to express my hopes and desire for the north end grocery store on Vashon to get the go ahead.

My family live on the North end of Vashon with three small children and feel that a small store and meeting place would greatly benefit our lives. I'd love to be able to walk and get some milk and bread, meet my community and grab coffee without having to get us all in the car and drive to and from town.

Without this essential community connection the North end can be very isolating. I'd love this to change and fully support Jennifer Potter's hard work and endeavor to make this happen!

Please say yes and push for the rezoning
Kind regards
Libby McCullagh

From: [M.J. "LUKE" MCQUILLIN](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: VASHON - GRANGE TO GROCERY
Date: Thursday, April 4, 2024 11:34:30 AM

Hello,
My name is Michael McQuillin
I live at 10723 SW Cowan Road and owned and lived here for 23 years
Vashon, WA
I support the idea of a store at the old Grange Property at 10365 SW Cowan Road,
Vashon, WA.

206.251.9922

From: [Lmoe](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: Grange Hall/grocery store
Date: Thursday, April 4, 2024 11:42:59 AM

I would like to show my 110% support in the Grange hall becoming a community grocery store. It is something that would be an asset and a beautiful addition to our community. That building has shared many benefits and memories in our community for many many years. It would be nice for it to be an interracial part of the community again. Specially in that area, it would service a large range of people. They have worked so hard to restore and make the building come alive again. Let's help it become a staple for the north end of Vashon Island for decades to come.

Lisa Moe
Co-founder and teacher at Vashon Explorers Preschool
vashonexplorerspreschool@gmail.com
206-463-9797

Please excuse any typos this was sent from LMoe's iPhone

**BLACK LIVES MATTER | NO HUMAN IS ILLEGAL | LOVE IS LOVE
| WOMENS RIGHTS ARE HUMAN RIGHTS | KINDNESS IS EVERYTHING**

From: [Cate O'Kane](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: Support for Rezoning - Vashon Heights Grocery.
Date: Thursday, April 4, 2024 12:51:15 PM

To whom it may concern:

As residents of the Vashon North End, we are writing to voice our support for, and passionate desire for, a local food store and community place as proposed by the Heights Grocery.

Having a place close by to buy staples vs needing to drive into town for that one missing ingredient, or meet up with neighbors over coffee and cakes would make such a difference.

After a long day of work schlepping out again to get groceries is exhausting but right now our only option. At the weekend being able to just wander down the hill for fresh bread or bacon, or that missing Parmesan for pasta would be amazing.

The Grange has been a part of this community for a long time but lies empty much of the time. Giving it new life would give our community new life and new energy.

Please consider rezoning as an urgent priority so we can make it a central part of our lives. Our community is supportive.

Thank you,
Cate OKane and Trey McBride
Cowan Rd, Vashon

From: [Carl Olsen](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: Heights grocery, Vashon Island: I support this.
Date: Thursday, April 4, 2024 12:33:40 PM

Hi,

I am just writing to express my support for Heights Grocery on Vashon Island.

I live on the Northend of Vashon, not far from the proposed location. I have been at this location for the last 20 years. I also grew up on Vashon, starting 1969 to 1990, along with much of my extended family.

I believe Heights Grocery would be an excellent improvement to our local community, and I support whatever is needed to make it happen.

Thank you!

Carl Olsen
9916 SW 112th St, Vashon, WA 98070
206 795 9238

From: [Jennifer Potter](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: endorsement for amendment to 21A.08.070 of the King County Land Use Code
Date: Thursday, April 4, 2024 12:48:42 PM

Hello!

I am writing with my whole-hearted endorsement for the project colloquially known as Heights Grocery Store, which will occupy the former Grange Hall building once a special zoning overlay is approved.

We northend residents of Vashon Island live in a dense, tight-knit food desert zone. We have to use a vehicle to drive miles away from our neighborhood for the most basic groceries or ingredients. We also yearn for a place to meet one another for a cup of coffee - or for a quick chat in the aisle. Also, preserving our old buildings is a must. If we can repurpose them for a more sustainable use, this should be a priority to maintain our unique island flavor. In addition, small family-owned businesses create more economic stability during an unstable era.

Please support this amendment to the Code!

Thank you,
Jennifer

[Jennifer Potter](#)
Court Reporter
206 979-7306
JenniferPotterCCR@gmail.com

From: [Riedmayer, Jennifer](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: King County CAO Updates
Date: Wednesday, April 3, 2024 2:14:03 PM
Attachments: [image001.png](#)

Hello,

I am reaching out to inquire about what listserv to register to track any updates to the CAO. I have signed up for the comp plan emails but wanted to see if there is an additional resource I should register for as well?

Thank you,

Jennifer Riedmayer

Pronouns: she/her

Multi-Agency Permit Program– HPA Permit Lead

Environmental Services Office | Washington State Department of Transportation

Cell (360) 800-7446 | Email: Jennifer.Riedmayer@wsdot.wa.gov



**Washington State
Department of Transportation**

From: [heather russell](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: Vashon Grange zoning update
Date: Thursday, April 4, 2024 1:22:50 PM

To whom it may concern:

The old Grange has served in bringing together this community over decades and we need it to continue in that vein. By providing grocery items and social space, it fills a critical role that is otherwise absent within 5 miles of the venue.

Please consider amending the zoning to accommodate this vital asset and piece of Vashon's history so it can serve the community once again!

Thanks for your consideration!

Heather
Sent from my iPhone

From: [Melissa Schafer](#)
To: [KCC - Legislative Clerks \(Email Group\)](#); [Melissa Schafer](#)
Subject: Grange Hall Vashon
Date: Thursday, April 4, 2024 12:50:41 PM

The old Grange has served in bringing together this community over decades and we need it to continue in that vein. By providing grocery items and social space, it fills a critical role that is otherwise absent within 5 miles of the venue. Please consider amending the zoning to accommodate this vital asset and piece of Vashon's history so it can serve the community once again!

From: [Rick Shrum](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: KC zoning code to RA allowing food stores
Date: Thursday, April 4, 2024 7:56:50 AM

I am writing in opposition to this change.

The change has been put in for one parcel owner and hidden from view in the way it has been done.

Vashon did not notice. The rural KC councils did not notice. This was intended as the change is a case of illegal spot zoning at its worst.

This change carries with it huge costs. To the proximal neighbors, and to the community. This totally out of context magic grant of retail uses into the RA zones will tie the hands of the future and misses a great opportunity to actually do the work that is within the bounds of the laws of land use, zoning and growth management.

Please do the right thing and drop this one off, spot zoning effort and support Vashon in creating a sub-sub area study area and plan for the north end of vashon.

The code change action violates zoning laws, the growth management act and is totally opposed by the proximal properties.

Rick Shrum
Vashon

From: [Tammi Sims](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: Vashon Comprehensive Plan: Heights Grocery
Date: Thursday, April 4, 2024 11:46:38 AM

Hello,

I am a resident of Vashon Island. I am writing in FULL-THROATED support of the Heights Grocery Store proposal for the former Vashon Grange Hall.

From an island community perspective, food access and a community gathering space on the north end have been sorely needed for years. The owner, Jennifer Potter, has been vigilant with her planning and community engagement and has a compelling and inclusive vision that has amassed enthusiastic support for her project.

Thank you,

Tammi Sims

From: [Heidi Skrzypek](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: KC Plan: Vashon needs Heights Grocery
Date: Thursday, April 4, 2024 12:30:33 PM

Hello King County, please be sure the new plan includes provisions that allow Heights Grocery on the north end of Vashon Island to be permitted, constructed, and operating. Thank you.

Heidi Skrzypek

Sent from my mobile (please forgive Siri-induced typos)!

Cell: 206.276.7846

From: [Sophia de Groen Stendahl](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: THE GRANGE ON VASHON!
Date: Thursday, April 4, 2024 12:55:13 PM

The old Grange has served in bringing together this community over decades and we need it to continue in that vein. By providing grocery items and social space, it fills a critical role that is otherwise absent within 5 miles of the venue. Please consider amending the zoning to accommodate this vital asset and piece of Vashon's history so it can serve the community once again!

Thank you!

Sophia de Groen Stendahl (She/Her)

Agent/Broker



WINDERMERE VASHON

Sophias@windermere.com

MOBILE 206-992-4636 I

OFFICE 206-463-9148 I

17429 Vashon Hwy SW / PO Box 1867 / Vashon, WA, 98070

From: [Steven Sterne](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: Please rezone for the Vashon North End Grocery
Date: Thursday, April 4, 2024 11:56:46 AM

As a recent Vashon resident, I ask that you allow the former Vashon Maury Island Grange building near the ferry terminal be converted to a grocery store. I understand that you have to change the zoning for that area, but it is a good change to add a much needed retail outlet to the North end of the island.

Thank you,

Steven

Steven Sterne
he-him
Photographer, Actor, Teacher, Director

From: [Marla Tuchak](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: Heights grocery on Vashon
Date: Thursday, April 4, 2024 12:16:39 PM

Please allow the Grange, which is a great building that We all love and respect to be used and loved once again by offering staples to a community who would definitely support this grocery store. We have a few grocery stores on Vashon, but having a neighborhood store where you can rely on staples and running into your neighbor for coffee is great for the community .

It's a beautiful building that deserves to be used and not just sitting there rotting. They've done a beautiful job of cleaning it up and we all love to be able to buy coffee or milk etc. when it's just one thing we forgot from the store a few miles away.

On behalf of our communities, healthfulness and wellness. Thank you for considering.

Please please please please.

Marla Tuchak
-Neighbor in the north end of Vashon

From: [Sean Waldron](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: King County Comp Plan 2024 Update - Grange Hall
Date: Thursday, April 4, 2024 11:01:05 AM

Hello -

I'm writing ahead of tonight's (April 4th) Local Services and Land Use Committee meeting to provide my full-throated support for the proposed changes to 21A.08.070 of the King County Land Use Code that will open the possibility of operating a general store at Vashon Island's north end.

The property has historically been a gathering space, not only for Vashon's north end but, for the island in general. Unfortunately, the Grange Hall - the historic node of the north end - has fallen into disrepair over the past few decades. However, the new owner brings a wonderful vision, passion for the neighborhood, and desire to honor the building and community that has been dormant for a long time. Further, many of the island's north end residents are desperate for food and gathering options that don't require them to go miles out of their way. Given the owner's passion, the building's history, and the overwhelming support from the community, it's easy to imagine everyone benefitting from this change and we thank you for considering it.

I urge you to preserve the amendment referenced above to reinvigorate this part of Vashon Island and provide residents with better, more sustainable options for food and community. Thank you!

SEAN WALDRON, LEED AP

ARCHITECT, PARTNER - WALDRON DESIGNS, LLC

(206) 408-7322 sean@waldrondesigns.com

17205 Vashon Hwy SW, Ste D1 - Vashon, WA 98070



From: [Samantha Weigand](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: Old Grange Hall
Date: Thursday, April 4, 2024 1:00:53 PM

The old Grange has served in bringing together this community over decades and we need it to continue in that vein. By providing grocery items and social space, it fills a critical role that is otherwise absent within 5 miles of the venue. Please consider amending the zoning to accommodate this vital asset and piece of Vashon's history so it can serve the community once again!

Samantha Weigand

From: [Rusty Willoughby](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: Heights Grocery
Date: Thursday, April 4, 2024 12:06:00 PM

Hello and thank you in advance for your time. I'm writing about the future of Heights Grocery, a community food market and gathering space planned for - but not exclusive to - Vashon's north end residents.

Vashon Island's north end is currently a food desert. Folks who live on the north end and who commute into the city must drive 12 miles round trip if they need an item from the grocery store after work. And the elderly folks in our neighborhood don't like to drive into town when they just want to gather with their neighbors. A modest grocery store and coffee stand that is easily walkable and has plenty of parking is something we've needed here for decades. Please consider green lighting the Heights Grocery store so we can remedy what is missing in our neighborhood. We desperately need a food store and gathering space just like what Jennifer Potter and I have been dreaming of creating for the last 6 years.

Sincerely,
Rusty Willoughby
206 399 4348
rustywilloughby@gmail.com

From: [Nancy Wolff](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: North end grocery, Vashon Island
Date: Thursday, April 4, 2024 12:09:53 PM

I am sending this text in support of the Northend Grocery proposal to be located in the historic Grange Hall on Vashon Island. I am supporting this for 3 reasons:

1. Community: this will provide our neighborhood a place to gather, increase awareness of who our neighbors are and improve community safety through this knowledge. Our neighborhood has been victim to home invasions, car theft and prowling.
2. Convenience/ energy conservation: currently the only option for northerners who may need a quick trip to the grocery store for a couple of items is an 8 mile round trip.
3. Conservation : the Grange Hall has provided a gathering place for islanders for years. It is part of our history and , with this project it will continue into our future.

Thank you for your consideration

Nancy Wolff

Sent from my iPhone

From: [Vanessa Wood](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: Vashon north end store! Yes!
Date: Thursday, April 4, 2024 12:31:08 PM

To whom it may concern,

Please rezone the Vashon Island north end building so that Ms. Jennifer Potter can open her long awaited grocery store. The north end of the island is truly in need of such a store. The location is very convenient for islanders who live on the north end as well as ferry commuters. This store will help the community to have better access to food and household needs.

Thank you for your quick action in favor of rezoning the building for Ms. Potter's future store. Our island community needs this service!

Thank you,
Vanessa Wood•island resident
somavashon@gmail.com
Sent from my iPhone

From: [Diane Emerson](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: Feedback on April 4 meeting on Vashon
Date: Wednesday, April 10, 2024 7:17:22 PM

I attended the comprehensive plan update meeting on April 4th on Vashon island. A lot of work went into preparing the graphics along the sides of the room. But relevant details were not included on those graphics. For example, a proposal to add a maximum height limit did not say what that maximum height limit would be. How is someone to know their opinion on these issues if the relevant details aren't included?

Please carefully think about what a typical member of the public would want to know when preparing the graphics for the public meetings.

Thank you.

Diane Emerson

Land Line Phone: (206) 567-5492
Cell Phone: 206-234-4813
DianeEmerson@yahoo.com
PO Box 2315, Vashon WA 98070

From: [ginger ferguson](#)
To: [Legislative Staff, Council CompPlan](#)
Cc: [ginger ferguson](#)
Subject: FW: Code to make a Food Store in RA zone / Land Use / Vashon Island
Date: Thursday, April 4, 2024 7:38:24 AM
Attachments: [2023 11 13 Newman to Jensen \(3\).pdf](#)

Members of the KC Council land use committee,

I am writing to oppose the zoning code change that introduces the retail use category of Food Stores into the RA zone.

This action by the KC Executive is a textbook example of illegal spot zoning. A legal opinion outlining the 4 areas where this change violates WA state laws is attached.

This method of granting one parcel is also fully opposed by all proximal neighbors except KC. The conflict of interest in this case is also appalling.

As the proximal owner on two sides of this property and with the master bedroom of my house being only 40 feet from the potential entrance the impacts are significant and permanent.

Finally, if this change goes thru KC opens itself up to a lawsuit that, according to my council, is very winnable. I ask you factor this in as you weigh your choice to remove this zoning code change from the plan.

Ginger Ferguson

From: [Compplan](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: FW: Grange Hall Vashon, WA 98070 - Rezoning/Spot Zoning
Date: Monday, April 15, 2024 11:43:08 AM

King County Comprehensive Planning Team

[Sign up](#) for email news about the 2024 King County Comprehensive Plan Update.

From: hans.hahne@att.net <hans.hahne@att.net>
Sent: Sunday, April 14, 2024 5:57 PM
To: Compplan <compplan@kingcounty.gov>
Cc: Kristine.gregonis@gmail.com
Subject: Grange Hall Vashon, WA 98070 - Rezoning/Spot Zoning

[EXTERNAL Email Notice!] External communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

RE: Grange Hall Vashon – Rezoning

To Whom It May Concern:

My wife, Kristine Gregonis, and I have the following comments/concerns regarding the proposed Grange Hall Spot Zoning:

1. No need for a grocery store on the North End. We won't patronize the business.
2. Against spot zoning approval for a "historic" Grange Hall grocery store. [To my knowledge the building is not registered as a historic building.]
3. Concerned about increased traffic and impervious surface area.
4. Ferry Parking lots were built in 1941-1942 when Vashon's population was around +/- 3000. Parking lots fill up on commuter days and vehicles spill over onto Cowan Rd., 104th Ave SW, 110th Street SW regularly.
5. Flag down King County / Metro bus system provides access to Vashon Town grocery stores for neighbors without vehicles.

Sincerely,

Hans J Hahne
10400 SW Cowan Rd
Vashon, WA 98070
Tel 407/924-7102

From: bonnibusmaximus@aol.com
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: Public Comment - LSLU Committee Special Meeting April 17th
Date: Wednesday, April 17, 2024 12:55:41 AM

For record -

To whom it may concern,

In regards to the KCCP 2024 update review and proposed ordinance.

Utilities -

Line 3157, strike this section in its entirety:

"E. If a proposed land use subject to subsection D. of this section is an essential public facility under the Washington state Growth Management Act, it shall be evaluated using the special use permit process and consistent with the Washington state Growth Management Act, the King County Countywide Planning Policies, and the King County Comprehensive Plan."

At bare minimum the council should enact the extensive recommendations under the DEIS and Executive's amendments related to BESS. Further, I challenge the notion that a privately owned BESS would qualify as a utility or justify the use of "eminent domain" as suggested by council chair Sarah Perry when I spoke to her at the Vashon meeting.

Please see below a letter signed by 27 members of congress that was sent to Secretary of Defense Lloyd Austin detailing concerns related to the security and safety of BESS. This is dated December 1st, 2023 and includes sources that you must consider before enacting amendments for the Comprehensive Plan that will be in effect for the next 20yrs.

<https://www.rubio.senate.gov/wp-content/uploads/2023/12/12.01.23-Rubio-Gallagher-letter-to-SecDef-re-CATL.pdf>

I sent another source in public comment that was regarding accidents with BESS and that was mentioned in a prior meeting by council chair. Please also address the congressional members' concerns that are also shared by members of your community.

Development Regulations -

In the proposed ordinance, there is frequent mention of the word "green," I assume as a metaphorical term for environmentally friendly. While you are considering development regulations for our county, please remember the real reason we are the Evergreen State and Seattle is the Emerald City: the trees. Please enact measures to preserve the oceanic rainforest. It is THE most "green" thing you can do. Since

climate change, carbon footprint and the environment are of key importance, it is your required duty to enact the most extensive recommendations in the DEIS and Executive's amendments to ensure the longterm preservation of our forests. This must come first. Avoid development of forest and rural areas above all.

Line 3188, how is this to be determined? There needs to be specific measures to be able to assess this and none are listed. You are required to elaborate on such a monumental change to rural zoning:

"c. this residential density would not harm or diminish the surrounding area, burden infrastructure, increase development pressure, and be inconsistent with the development patterns promoted by the Comprehensive Plan;"

Line 3258, do not strike about clustering away from axis of corridor as there is no justification for LESS clarity in regards to protecting wildlife AND people

Sections 54 and 55 wording must be reconsidered in regards to using a VAGUE term of "development" versus the specific terms of "housing and retail/service" as there is no clarity on type of development and that is a requirement of the KCCP, to be clear and precise.

Section 102, housing types larger than fourplexes should be limited to URBAN and R1-8 areas only to avoid sprawl and population growth beyond the growth targets set forth in the plan. Also the related four-to-one rules should be struck and only include urban and R1-8 areas.

Line 6607, must define the number of trips that would qualifu as "substantial" on terms of volumes of heavy gross weight truck trips when investing in infrastructure in the rural industrial areas.

Line 8311, after the line "department may limit the scope of the required critical area report to include only that part of the site that is affected by the development proposal," please specify that the department may but (is not required) to limit the scope, and also include considerations for effects on the nearby critical areas of the proposed project and require mitigation.

Four to One-

Line 2402, drainage facilities should not be exempt: "6. Land added to the urban growth area for drainage facilities in support of its development shall not require dedication of permanent open space;"

Line 2489, accessory dwelling units should be able to be used for affordable housing as this is a rapidly growing industry in Washington with a variety of applications and desired by people who are of all income levels. Limiting housing options is in direct opposition to the directive to solve the housing crisis.

Line 2495, the effective date MUST be longer than 60 days, at minimum 90 days, but

to ensure public awareness, engagement and involvement in the KCCP as directed, time must be given for the non-technical public to navigate the political process to ensure our forest and farm lands are not permanently removed from production by housing.

Implementation -

In proposed ordinance:

Line 2318, it is not necessary to remove: "C. ((When technical matters are considered with regard to docketed issues, or to evaluate public testimony, due consideration shall be given to technical testimony from the public and third party analysis may be sought when appropriate.))"

Line 2267, do not remove the annual schedule component as this is indicative of encouraging less public engagement with the process, less availability to resources and less interest in transparency, which would be in opposition to your KCCP directives.

Section 91 - if requiring permanent assistance with housing, services provided should not be voluntary to ensure success of this housing type

Line 6063, "safe parking" should be set back no less than 50ft from any residence

Line 10347, You MUST protect the water and environment by continuing to exclude the uses within the area of the ground water protection special district that are in place now. This section should NOT be altered. It is not "green" and references no BAS for this idea.

Line 11188, there is no BAS to show to determine social costs of carbon, this line must be struck until BAS is available.

Section 129 there is a typo in the title using the word recreational in the graph

Thank you for your time.

Sincerely,

Bonnie Helms
Auburn, WA
253-632-6085

From: [Peter Rimbos](#)
To: [Perry, Sarah](#); [Zahilay, Girmay](#); [Dunn, Reagan](#); [Mosqueda, Teresa](#)
Cc: [Smith, Lauren](#); [Jensen, Chris](#); [Hollingshead, Libby](#); [Paige, Robby](#); [Eccles, Cody](#); [Kremen, Jordan](#); [Lewis, Rhonda](#); [Nunez Pargas, Graciela](#); [House, Erin](#); [Kray, Melanie](#); [Legislative Staff, Council CompPlan](#); [KCC - Legislative Clerks \(Email Group\)](#)
Subject: April 3, Briefing #6--Written Copy of Joint Team Oral Testimonies
Date: Friday, April 5, 2024 12:03:01 PM
Attachments: [KC C LS&L-U Comm Briefings--Jt Tm Oral Testimonies--4-4-24.pdf](#)

KC Council Local Services & Land-Use Committee,

Thank you for providing members of the Public the opportunity to address you this past Wednesday (April 3) morning during the Committee's **Briefing #6** on the *2024 KCCP Major 10-Year Update*.

Attached please find the five [Oral Testimonies](#) provided by members of the Joint Team.

We have started to prepare multiple Oral Testimonies to address the following Topics that will be covered during the upcoming April 17 **Briefing #7**:

- Chapter 9: Services, Facilities, & Utilities
- Capital Facilities and Utilities Appendix
- Chapter 10: Economic Development
- Chapter 12: Implementation, Amendments, and Evaluation
- Development Regulations
- Four-to-One Program

Peter Rimbos
Coordinator, Joint Rural Area Team--*KCCP*, *CPPs*, and *VISION 2050*
Greater Maple Valley Unincorporated Area Council (GMVUAC)
primbos@comcast.net

"To know and not to do is not to know."-- Chinese proverb

Please consider our shared environment before printing.

Comment Form



King County 2024 King County Comprehensive Plan Update

Name: Bob Katrea

Email: bobkat4pha@gmail.com

Check to receive email updates on the 2024 Comprehensive Plan Update

Which best describes your interest in the 2024 King County Comprehensive Plan Update?

I live in King County I work in King County Professional interest

ABOUT THE 2024 KING COUNTY COMPREHENSIVE PLAN UPDATE

The King County Comprehensive Plan is the guiding policy document for land use and development in unincorporated King County. The 2024 Comprehensive Plan Update includes substantive policy changes, map amendments, and development regulation updates. It includes updates to comply with state law changes and updates to underlying data in the Comprehensive Plan.

The 2024 Comprehensive Plan Update also includes a subarea plan for the Snoqualmie Valley/Northeast King County area and updates to Countywide Planning Policies around the Four-to-One Program.

Use the space below to comment on the 2024 King County Comprehensive Plan Update.

- VS-P28 No. Floors/Height: concerns that
designs of mixed-use/housing may take
advantage of 3-story development
well beyond 35 ft stated limit. ^{who} monitors
this?
- Will a design review be required for
all development w/ or w/o urban rural
town area?

From: [Joe & Elizabeth](#)
To: [Dunn, Reagan](#)
Cc: [Eccles, Cody](#); [Kremen, Jordan](#); [Jensen, Chris](#); [Legislative Staff, Council CompPlan](#); [Auzins, Erin](#); [Perry, Sarah](#)
Subject: RE: King County Comprehensive Plan
Date: Monday, April 8, 2024 5:13:14 PM

Councilmember Dunn-

Could you give me the status of this proposed Comp Plan Policy?

Thank you,

-Joe Miles

(425) 523-5275

From: Joe & Elizabeth <milesje@q.com>
Sent: Monday, March 25, 2024 7:03 PM
To: 'Dunn, Reagan' <Reagan.Dunn@kingcounty.gov>
Cc: 'Eccles, Cody' <Cody.Eccles@kingcounty.gov>; 'Kremen, Jordan' <Jordan.Kremen@kingcounty.gov>; 'Jensen, Chris' <Chris.Jensen@kingcounty.gov>; 'CouncilCompPlan@kingcounty.gov' <CouncilCompPlan@kingcounty.gov>; 'Erin.Auzins@kingcounty.gov' <Erin.Auzins@kingcounty.gov>; Wjimenez@kingcounty.gov; 'Hodson, Doug' <Doug.Hodson@kingcounty.gov>; 'sarah.perry@kingcounty.gov' <sarah.perry@kingcounty.gov>
Subject: RE: King County Comprehensive Plan

Councilmember Reagan Dunn-

Pursuant to our discussion in February, regarding the Comprehensive Plan and future Park Levies (see attached), I propose the following new Comprehensive Plan Policy for Chapter 7 Parks:

The King County Parks Levy Oversight Board, comprised of citizen representatives from all Council Districts, shall review and provide comments on all future Park Levy proposals prior to adoption, with a detailed focus on equity and social justice, to ensure priority funding is directed to underserved communities.

Please contact me if you have any questions.

Joe Miles

(425) 523-5275

From: [CLARK & SUE NEBEKER](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: Comprehensive Plan for Vashon-Maury Island
Date: Friday, April 5, 2024 1:17:45 PM

At the meeting last night I spoke about community concerns regarding the Thunderbird treatment center. I was promptly informed that this question was not to be considered as part of the agenda. I indicated that I thought zoning issues were covered under the maps posted, and it was pointed out later that the treatment center was not covered by the shaded areas on these maps. I guess that was my error and I realize I should have reviewed the maps more closely.

But I still have questions and I hope you can provide some clarification:

1. It appears that the comprehensive plan proposed last December did not propose any refinements or changes for areas on the Island outside of the shaded areas of the Amendment 9 maps.
2. If the plan does not include these excluded areas, how will zoning requests for revision be handled? As exceptions to the current or proposed Comprehensive plan?
3. If King County considers any zoning changes, will community input be considered? (This was really the point about concerns and community input that I requested from the Council.)

Thank you for listening and I look forward to your response.

Clark Nebeker

Comment Form



King County 2024 King County Comprehensive Plan Update

Name: CHRIS QUOTE

Email: me@chrisquote.com

Check to receive email updates on the 2024 Comprehensive Plan Update

Which best describes your interest in the 2024 King County Comprehensive Plan Update?

- I live in King County I work in King County Professional interest

ABOUT THE 2024 KING COUNTY COMPREHENSIVE PLAN UPDATE

The King County Comprehensive Plan is the guiding policy document for land use and development in unincorporated King County. The 2024 Comprehensive Plan Update includes substantive policy changes, map amendments, and development regulation updates. It includes updates to comply with state law changes and updates to underlying data in the Comprehensive Plan.

The 2024 Comprehensive Plan Update also includes a subarea plan for the Snoqualmie Valley/Northeast King County area and updates to Countywide Planning Policies around the Four-to-One Program.

Use the space below to comment on the 2024 King County Comprehensive Plan Update.

CONSIDER A DARK SKY ORDINANCE
STIMULATE THE DENSITY OF HOUSING
ACTIVITY INCREASE IN VASSTON TOWN

From: [Angela Donaldson](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: Fwd: ADU minimum lot size changes for upcoming comprehensive plan
Date: Tuesday, April 16, 2024 10:47:19 AM

Resending

Begin forwarded message:

From: "Reynolds, Jesse" <jesreynolds@kingcounty.gov>
Date: October 26, 2022 at 10:31:59 AM PDT
To: ilovefallcity@gmail.com, "Reid, Jacqueline" <jreid@kingcounty.gov>
Subject: RE: ADU minimum lot size changes for upcoming comprehensive plan

Thanks, Angela. We do want to explore ways to add affordable housing in the area. I just suggested to Jason we could have it as a topic for discussion during a Fall City focus group, or a housing-specific meeting.

From: ilovefallcity@gmail.com <ilovefallcity@gmail.com>
Sent: Tuesday, October 25, 2022 5:16 PM
To: Reid, Jacqueline <jreid@kingcounty.gov>; Reynolds, Jesse <jesreynolds@kingcounty.gov>
Subject: FW: ADU minimum lot size changes for upcoming comprehensive plan

[EXTERNAL Email Notice!] External communication is important to us. Be cautious of phishing attempts. Do not click or open suspicious links or attachments.

Heads up... several committee members agreed that this is an issue would support this request, however as a committee, we did not do any community outreach on it and we will not promote increasing density without outreach.

From: Jason Refsland <jason.refsland@gmail.com>
Sent: Monday, October 24, 2022 7:34 PM
To: Angela Donaldson <ilovefallcity@gmail.com>
Subject: Fwd: ADU minimum lot size changes for upcoming comprehensive plan

This is what I sent to Sarah Perry.

----- Forwarded message -----

From: Jason Refsland <jason.refsland@gmail.com>
Date: Tue, Oct 18, 2022 at 12:08 PM
Subject: ADU minimum lot size changes for upcoming comprehensive plan
To: <sarah.perry@kingcounty.gov>

Dear Councilmember Perry-

My name is Jason Refsland, I'm a resident of unincorporated King County. Though I'm currently an active member of the Fall City Community Association and a Sub Area Plan committee member, I'm writing to you as a private citizen and not on behalf of that organization. Thank you for taking a moment to hear my proposed changes to the minimum lot size requirements for an ADU.

I live in a RA 2.5 zone and recently learned that though I own .75 acres I can't have a detached ADU because I need to have a minimum of 1.875 acres in my zone. The RA 5 zone requires 2.5 acres. In nearby Fall City, the minimum lot size requirement is 3,200 sqft for R-4. The size disparity between these minimum lot sizes seems quite out of proportion for adjacent areas.

I thought perhaps it's a building to land ratio issue, but I am allowed to build a garage. I just can't put an ADU in the attic above. This rule doesn't make sense and is actively working against the council's effort to supply more affordable housing options in the valley.

ADU's not only provide an effective way of increasing the number of affordable housing units in the area, they also help owners subsidize the expense of owning property in such an expensive area. This is a win-win for affordable housing. An increase in supply lowers rental costs and the additional rental income helps those with less means afford to live here. ADU's are also a simple way to allow growth without creating major changes in density in a rural area.

Please consider changing the lot size minimum requirements for RA 2.5 and RA 5 to match the urban and rural town requirement of 3,200 sq ft. I appreciate your time and consideration.

Sincerely,
Jason Refsland

From: [Rick Shrum](#)
To: [Legislative Staff, Council CompPlan](#)
Subject: Fwd: KC zoning code to RA allowing food stores
Date: Thursday, April 4, 2024 8:05:37 AM

>

> I am writing in opposition to this change.

> The change has been put in for one parcel owner and hidden from view in the way it has been done.

> Vashon did not notice. The rural KC councils did not notice. This was intended as the change is a case of illegal spot zoning at its worst.

> This change carries with it huge costs. To the proximal neighbors, and to the community. This totally out of context magic grant of retail uses into the RA zones will tie the hands of the future and misses a great opportunity to actually do the work that is within the bounds of the laws of land use, zoning and growth management.

>

> Please do the right thing and drop this one off, spot zoning effort and support Vashon in creating a sub-sub area study area and plan for the north end of vashon.

>

> The code change action violates zoning laws, the growth management act and is totally opposed by the proximal properties.

>

> Rick Shrum

> Vashon

>

>

Comment Form



King County

2024 King County Comprehensive Plan Update

Name: Tammi Sims

Email: simstammi@gmail.com

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- I live in King County Washon I work in King County Professional interest

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Use the space below to comment on the 2024 King County Comprehensive Plan Update.

Up to the Heights Grocery Store
at the Washon Grange Hall.

Comment Form



King County 2024 King County Comprehensive Plan Update

Name: Joe Yarkin

Email: solarjoe@gmail.com

Check to receive email updates on the 2024 Comprehensive Plan Update

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I live in King County I work in King County Professional interest

ABOUT THE 2024 KING COUNTY COMPREHENSIVE PLAN UPDATE

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Use the space below to comment on the 2024 King County Comprehensive Plan Update.

for shoreline properties - is there
any changes to the lot size for
septic allowances. New minimums
for example. Thank You

Joe

From: [Tim Trohimovich](#)
To: [Legislative Staff, Council CompPlan](#); [Compplan](#)
Cc: [Brooke Frickleton](#)
Subject: Comments on Four to One Program and Critical Areas Policies Comp Plan Update
Date: Tuesday, April 16, 2024 2:04:51 PM
Attachments: [image003.png](#)
[2024-04-16 FW Comments Ord 2023-0440 Four to One 2024 King Cnty Comp Plan Draft Final.pdf](#)

Dear Council Members and Staff:

Enclosed please find Futurewise's comments on the Proposed Ordinance 2023-0440 – 2024 King County Comprehensive Plan update Four to One Program and Proposed Ordinance 2023-0438 and Attachment A to GMPC Motion 23-4: GMPC Recommended Amendments to the Countywide Planning Policies related to Urban Growth Area Amendments through the Four-to-One Program, and critical areas policies.

Thank you for considering our comments.

If you need anything else, please let me know.

Tim Trohimovich, AICP (he/him)
Director of Planning & Law



Futurewise
1201 3rd Ave #2200, Seattle, WA 98101
(206) 343-0681
tim@futurewise.org
futurewise.org
connect: [Twitter](#) [Facebook](#)

From: bonnibusmaximus@aol.com
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: Re: Public Comment - LSLU Committee Special Meeting April 17th
Date: Thursday, April 18, 2024 6:32:12 AM

Please note error in previous comment about Section 102, I have corrected it below:

Section 102, housing types larger than fourplexes should be limited to URBAN and R9-48 areas only to avoid sprawl and population growth beyond the growth targets set forth in the plan. Also the related four-to-one rules should be struck and only include urban and R9-48 areas.

On Wednesday, April 17, 2024 at 12:55:11 AM PDT, bonnibusmaximus@aol.com <bonnibusmaximus@aol.com> wrote:

For record -

To whom it may concern,

In regards to the KCCP 2024 update review and proposed ordinance.

Utilities -

Line 3157, strike this section in its entirety:

"E. If a proposed land use subject to subsection D. of this section is an essential public facility under the Washington state Growth Management Act, it shall be evaluated using the special use permit process and consistent with the Washington state Growth Management Act, the King County Countywide Planning Policies, and the King County Comprehensive Plan."

At bare minimum the council should enact the extensive recommendations under the DEIS and Executive's amendments related to BESS. Further, I challenge the notion that a privately owned BESS would qualify as a utility or justify the use of "eminent domain" as suggested by council chair Sarah Perry when I spoke to her at the Vashon meeting.

Please see below a letter signed by 27 members of congress that was sent to Secretary of Defense Lloyd Austin detailing concerns related to the security and safety of BESS. This is dated December 1st, 2023 and includes sources that you must consider before enacting amendments for the Comprehensive Plan that will be in effect for the next 20yrs.

<https://www.rubio.senate.gov/wp-content/uploads/2023/12/12.01.23-Rubio-Gallagher-letter-to-SecDef-re-CATL.pdf>

I sent another source in public comment that was regarding accidents with BESS and that was mentioned in a prior meeting by council chair. Please also address the

congressional members' concerns that are also shared by members of your community.

Development Regulations -

In the proposed ordinance, there is frequent mention of the word "green," I assume as a metaphorical term for environmentally friendly. While you are considering development regulations for our county, please remember the real reason we are the Evergreen State and Seattle is the Emerald City: the trees. Please enact measures to preserve the oceanic rainforest. It is THE most "green" thing you can do. Since climate change, carbon footprint and the environment are of key importance, it is your required duty to enact the most extensive recommendations in the DEIS and Executive's amendments to ensure the longterm preservation of our forests. This must come first. Avoid development of forest and rural areas above all.

Line 3188, how is this to be determined? There needs to be specific measures to be able to assess this and none are listed. You are required to elaborate on such a monumental change to rural zoning:

"c. this residential density would not harm or diminish the surrounding area, burden infrastructure, increase development pressure, and be inconsistent with the development patterns promoted by the Comprehensive Plan;"

Line 3258, do not strike about clustering away from axis of corridor as there is no justification for LESS clarity in regards to protecting wildlife AND people

Sections 54 and 55 wording must be reconsidered in regards to using a VAGUE term of "development" versus the specific terms of "housing and retail/service" as there is no clarity on type of development and that is a requirement of the KCCP, to be clear and precise.

Section 102, housing types larger than fourplexes should be limited to URBAN and R1-8 areas only to avoid sprawl and population growth beyond the growth targets set forth in the plan. Also the related four-to-one rules should be struck and only include urban and R1-8 areas.

Line 6607, must define the number of trips that would qualifu as "substantial" on terms of volumes of heavy gross weight truck trips when investing in infrastructure in the rural industrial areas.

Line 8311, after the line "department may limit the scope of the required critical area report to include only that part of the site that is affected by the development proposal," please specify that the department may but (is not required) to limit the scope, and also include considerations for effects on the nearby critical areas of the proposed project and require mitigation.

Four to One-

Line 2402, drainage facilities should not be exempt: "6. Land added to the urban growth area for drainage facilities in support of its development shall not require dedication of permanent open space;"

Line 2489, accessory dwelling units should be able to be used for affordable housing as this is a rapidly growing industry in Washington with a variety of applications and desired by people who are of all income levels. Limiting housing options is in direct opposition to the directive to solve the housing crisis.

Line 2495, the effective date MUST be longer than 60 days, at minimum 90 days, but to ensure public awareness, engagement and involvement in the KCCP as directed, time must be given for the non-technical public to navigate the political process to ensure our forest and farm lands are not permanently removed from production by housing.

Implementation -

In proposed ordinance:

Line 2318, it is not necessary to remove: "C. ((When technical matters are considered with regard to docketed issues, or to evaluate public testimony, due consideration shall be given to technical testimony from the public and third party analysis may be sought when appropriate.))"

Line 2267, do not remove the annual schedule component as this is indicative of encouraging less public engagement with the process, less availability to resources and less interest in transparency, which would be in opposition to your KCCP directives.

Section 91 - if requiring permanent assistance with housing, services provided should not be voluntary to ensure success of this housing type

Line 6063, "safe parking" should be set back no less than 50ft from any residence

Line 10347, You MUST protect the water and environment by continuing to exclude the uses within the area of the ground water protection special district that are in place now. This section should NOT be altered. It is not "green" and references no BAS for this idea.

Line 11188, there is no BAS to show to determine social costs of carbon, this line must be struck until BAS is available.

Section 129 there is a typo in the title using the word recreational in the graph

Thank you for your time.

Sincerely,

Bonnie Helms
Auburn, WA
253-632-6085

From: [ilgatto39](#)
To: [KCC - Legislative Clerks \(Email Group\)](#)
Subject: Rest rooms at trailheads
Date: Tuesday, April 30, 2024 8:10:31 PM

Sent from my Verizon, Samsung Galaxy smartphone

There is still no regular maintenance!!! Vandalism and graffiti a critical issue. Full time security recommended. Picnic tables at High Point need replacement.

From: [Peter Rimbos](#)
To: [Perry, Sarah](#); [Zahilay, Girmay](#); [Dunn, Reagan](#); [Mosqueda, Teresa](#)
Cc: [Smith, Lauren](#); [Jensen, Chris](#); [Miller, Ivan](#); [Hollingshead, Libby](#); [Paige, Robby](#); [Eccles, Cody](#); [Kremen, Jordan](#); [Lewis, Rhonda](#); [Nunez Pargas, Graciela](#); [House, Erin](#); [Kray, Melanie](#); [Auzins, Erin](#); [Legislative Staff, Council CompPlan](#); [KCC - Legislative Clerks \(Email Group\)](#)
Subject: April 17, Briefing #7--Written Copy of Joint Team Oral Testimonies
Date: Thursday, April 18, 2024 9:55:12 AM
Attachments: [KC C LS&L-U Comm Briefings--Jt Tm Oral Testimonies--4-17-24.pdf](#)

KC Council Local Services & Land-Use Committee,

Thank you for providing members of the Public the opportunity to address you this past Wednesday (April 17) morning during the Committee's Briefing #7 on the 2024 KCCP Major 10-Year Update.

Attached please find a total of seven Testimonies—five Oral Testimonies that were provided by members of the Joint Team and two Testimonies two of our members planned to give, but had day/time conflicts, which we include for completeness. Our Testimonies cover the following Topics:

- Chapter 9: Services, Facilities, & Utilities
- Chapter 10: Economic Development
- Chapter 12: Implementation, Amendments, & Evaluation
- Development Regulations
- Four-to-One Program [*We refer to Testimonies we provided in 2023 to the GMPC on this topic*]

Thank you to your attention to these topics, issues, and potential solutions.

Peter Rimbos
Coordinator, Joint Rural Area Team--KCCP, CPPs, and VISION 2050
Greater Maple Valley Unincorporated Area Council (GMVUAC)
primbos@comcast.net

"To know and not to do is not to know."-- Chinese proverb

Please consider our shared environment before printing.

From: [Todd Gray](#)
To: [Legislative Staff, Council CompPlan](#); [Paige, Robby](#); [Williams, Gabriela](#); [Auzins, Erin](#)
Cc: [Aaron Jones](#); [Tyler Eastman](#); [Kurt Nelson](#)
Subject: Comments Re: 2024 King County Comprehensive Plan Update – Chapter 5, Environment
Date: Friday, April 19, 2024 10:00:28 AM
Attachments: [TTT Comments 2024KingCoComp_CH5_20240419.pdf](#)

Please see the attached comment letter from The Tulalip Tribes.

Thank you,

Todd Gray

Environmental Protection Ecologist
The Tulalip Tribes | Natural Resources Dept.
360-716-4620 | toddgray@tulaliptribes-nsn.gov

From: [Jessica Anakar](#)
To: [Jensen, Chris](#); [Mosqueda, Teresa](#); [Perry, Sarah](#); [De Clercq, Danielle](#); [StoDomingo, Bong](#); [Legislative Staff, Council CompPlan](#)
Cc: [David S. Vogel](#); [jacobmiddling@icloud.com](#); [mrstearns@comcast.net](#); [Deborah Reilly](#); [kim@goforthgill.com](#); [tanyainvashon@gmail.com](#); [rcollen@comcast.net](#); [kimkambak@gmail.com](#); [Morgan Brown](#); [Jim Garrison](#); [tooz@oceanatlas.com](#); [Amy Drayer](#); [Diane Emerson](#)
Subject: V-MCC King County Comprehensive Plan
Date: Monday, April 29, 2024 1:58:55 PM



V-MCC

Vashon-Maury Community Council
PO Box 2315
Vashon, WA 98070
www.v-mcc.org

Dear King County Representatives,

Vashon-Maury Community Council members voted and approved the recommendation to King County's Comprehensive Plan of the Vashon Town plan committee on April 18, 2024.

Recommendations to King County for the King County Comprehensive plan are included in this document: [Vashon Town Plan Recommendation](#)

Thank you for your time and Public Service.

Sincerely,

The Vashon-Maury Community Council Board

Diane Emerson
Debra Gussin
Jamilla Stigall
Ben Carr
Tammi Dye
Jessica Anakar