

**From:** [Jeffrey Longstead](#)  
**To:** [Legislative Staff, Council CompPlan](#)  
**Subject:** Comment on Comprehensive Plan  
**Date:** Friday, December 13, 2024 8:57:42 AM

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Please find my comments below on the referenced section of the Comprehensive Plan:

2710 ((E-483)) E-413 Wetland impacts ((should)) shall be avoided if possible, and

2711 minimized in all cases. Applicants shall demonstrate that impacts are

2712 unavoidable due to circumstances outside of the applicant's control,

2713 and not for the profit or convenience of development. Where impacts

2714 cannot be avoided, they should be mitigated on site if the proposed

Comment: This language is different from State or Federal regulatory guidance for avoidance and minimization of wetland impacts. “Outside of the applicant’s control, and not for the profit or convenience of development” is nebulous and does not make any sense within the context of growth management and watershed-based protection of aquatic areas. The writer of this section of the Comprehensive Plan is obviously ideologically opposed to “profit” and “convenience”, two things that are critical to making effective communities and planning for growth in our County. Zoning codes plan for development to occur in a specific way in the County, for the betterment of it’s citizens. Developers of suitable development projects and infrastructure must make a “profit” in order to stay in business and provide services and products to King County residents. This is not a dirty word. “Convenience” is also important for development projects who are tasked with meeting growth targets for things like housing and services on appropriately zoned parcels. Underutilizing zoning codes is counterproductive for planning for growth. It is critical in some cases to make development projects operate “conveniently” in the community for future use of these structures. There are many examples of development projects underutilizing current zoning designations to build a smaller or less operable project in order to avoid a low value wetland or aquatic area, when far superior options exist to mitigate for that wetland or aquatic area and build a better project. This language is short-sided and fails to take into account the options the county already has for highly functioning mitigation solutions like the Mitigation Reserves program and State and Federally Certified Wetland Mitigation Banks. I have toured these projects and they are far superior than avoiding a small low functioning wetland on a highly zoned multi-family parcel or industrial development that creates jobs and homes.

Thanks,

Jeff



**From:** [Jensen, Chris \(they/them\)](#)  
**To:** [Legislative Staff, Council CompPlan](#)  
**Subject:** FW: Ecology Comments on King County's Draft Critical Areas Ordinance Update  
**Date:** Friday, March 14, 2025 9:40:24 AM  
**Attachments:** [03142025\\_ECYLetter\\_KingCountyCAO.pdf](#)

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**Chris Jensen** – [they/them](#)

Comprehensive Planning Manager

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

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**From:** Atkins, Emily (ECY) <eatk461@ECY.WA.GOV>  
**Sent:** Friday, March 14, 2025 9:33 AM  
**To:** Jensen, Chris (they/them) <Chris.Jensen@kingcounty.gov>  
**Cc:** Proebsting, Robin <rproebsting@kingcounty.gov>; Opolka, Teresa (ECY) <topo461@ECY.WA.GOV>; Molstad, Neil (ECY) <NEMO461@ECY.WA.GOV>; jobu461 <jobu461@ECY.WA.GOV>; Aken, Jeff (COM) <jeff.aken@commerce.wa.gov>  
**Subject:** Ecology Comments on King County's Draft Critical Areas Ordinance Update

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Hello Chris Jensen,

Please see the attached letter from Ecology regarding comments on King County's proposed draft Critical Area Ordinance update submitted to PlanView (Submittal 2024-S-7674) on 10/29/2024.

Best,

Emily Atkins

*She/Her*

*Critical Areas Ordinance Coordinator*

*Shorelands and Environmental Assistance Program*

*WA State Dept of Ecology*

[emily.atkins@ecy.wa.gov](mailto:emily.atkins@ecy.wa.gov) | 360-628-6680

**From:** [Peter Rimbos](#)  
**To:** [Perry, Sarah](#); [Quinn, De"Sean](#); [Mosqueda, Teresa](#); [Dunn, Reagan](#)  
**Cc:** [Balducci, Claudia](#); [Barón, Jorge L.](#); [Dembowski, Rod](#); [Von Reichbauer, Pete](#); [Zahilay, Girmay](#); [Smith, Lauren](#); [Jensen, Chris \(they/them\)](#); [Smith, Megan \(DNRP\)](#)  
**Subject:** Joint Rural Team Review & Comment—KC Exec's 2024 Prop"d Upd to the KC CAO & BAS  
**Date:** Monday, March 17, 2025 10:38:57 AM  
**Attachments:** [KCCP CAO Upd-BAS--JRT Comments.pdf](#)

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KC Local Services and Land-Use Committee Chair Perry and Members,

Please accept the Joint Rural Team's **Comment Letter** (attached) on the King County Executive's **2024 Proposed Update to the King County Critical Areas Ordinance (CAO) and Best Available Science (BAS), October 2024**, as part of our continuing review of the *2024 KCCP Major Ten-Year Update*.

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

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

*Please consider our shared environment before printing.*

**From:** [Paige, Robby](#)  
**To:** [Legislative Staff, Council CompPlan](#)  
**Subject:** The Snoqualmie Tribe - CAO Comment Letter  
**Date:** Monday, March 31, 2025 2:28:39 PM  
**Attachments:** [2025\\_3\\_KC\\_CAO\\_STComments.pdf](#)

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Hello,

Providing a copy of The Snoqualmie Tribe's most recent comment letter for the Critical Areas Ordinance. They asked if this could be distributed to the rest of the Councilmembers.

Best,  
Robby

**Robby Paige**

Policy Analyst  
Councilmember Sarah Perry  
King County Council, District 3  
206-445-9246