

**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

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

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

**From:** [Vande Griend, Carryn](#)  
**To:** [KCC - Legislative Clerks - Distribution Group](#)  
**Subject:** April 16: Local Services and Land Use Committee  
**Date:** Monday, April 14, 2025 4:35:49 PM

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Hello,

My name is Carryn Vande Griend and I work at Puget Sound Energy. I'm sending in PSE's comments ahead of the Local Services and Land Use Committee's briefing on wildfire preparedness on April 16. Thank you for distributing to the committee.

Puget Sound Energy takes a holistic approach to the evolving risk of wildfires by operating and improving our infrastructure to create an electric system that is reliable, resilient, and above all, safe. PSE's Wildfire Risk Management Program includes our year-round work to prevent wildfires by investing in projects to strengthen our infrastructure, utilizing tools and new technologies to enhance our situational awareness, monitoring real-time conditions and operating the electric system at varying levels of sensitivity and partnering with emergency responders, local organizations, and our customers to build more resilient communities.

We also use weather forecasting and modeling tools to evaluate conditions, and we may operate our electric system more conservatively during critical fire weather conditions to prevent wildfires. This includes turning on Enhanced Powerline Settings (EPS) or using a Public Safety Power Shutoff (PSPS) to help keep our customers and communities safe. These measures can result in power outages, and we want you to be prepared.

We consider multiple factors when deciding which measures to use to safely operate the electric system, including wind speed, humidity, temperature, moisture levels in trees and brush, fire risk modeling, and observations from field crews and local emergency response partners.

During high-risk conditions, PSE uses [Enhanced Powerline Settings](#) on targeted lines to make the electric system more sensitive to potential hazards, such as a tree branch touching a line, and automatically turn power off to prevent sparks. Customers may experience [unplanned power outages](#) when these settings are in place, and can find restoration updates on the outage map.

When conditions threaten our ability to safely operate the electric system, we may use a [Public Safety Power Shutoff](#) to prevent wildfires from starting by proactively turning off power. We will notify impacted customers and emergency response partners in advance of a PSPS and provide updates throughout the event.

**As we approach the summer, here are some steps you can take to prepare for peak wildfire season:**

- Create and practice a household emergency plan and build an emergency kit.
- Learn more about how we operate the electric grid to prevent wildfires and keep communities safe, including using Public Safety Power Shutoffs: [pse.com/psps](https://pse.com/psps)
- Make sure your PSE account contact information is up to date: [pse.com](https://pse.com)
- If you use a medical device in your home that relies on electricity, apply for Life Support status on your account: [pse.com/medical](https://pse.com/medical)
- Get your free Wildfire Ready Plan and take action to make your home and community more resilient: [wildfireready.dnr.wa.gov](https://wildfireready.dnr.wa.gov)

We appreciate all the work King County has been doing to prepare for peak wildfire season, and look forward to working in partnership to keep our communities safe.

Thank you,  
Carryn

**Carryn Vande Griend**  
PSE Local Government Affairs

Central & Eastern Washington  
[Carryn.VandeGriend@pse.com](mailto:Carryn.VandeGriend@pse.com)  
509.218.9012

**From:** [Lauren Silver-Turner](#)  
**To:** [KCC - Legislative Clerks - Distribution Group](#)  
**Subject:** Public Comment - Proposed Ordinance 2024-0408  
**Date:** Wednesday, April 16, 2025 7:56:16 AM

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Good morning Councilmembers,

My name is Lauren Silver-Turner and I'm the Executive Director of the Snoqualmie Valley Preservation Alliance, a nonprofit working to protect and enhance the lives, livelihoods, lands, and waters of the Snoqualmie Valley. Farmland protection, agricultural viability, and a resilient local food system are core to our mission.

I am emailing to provide comment on the proposed critical areas ordinance updates.

To begin, I was surprised—and frankly disappointed—to hear that executive branch staff cited robust outreach and engagement of agricultural stakeholders for this update process. It was even suggested that the Fish, Farm, Flood Implementation Oversight Committee, or FFF IOC, was consulted. As a long-time IOC member and the current Farm Caucus Co-Chair, I must respectfully disagree. We had a single, presentation-style meeting on the Best Available Science report, but no opportunity was given to provide substantive input or collaboratively shape revisions.

To my knowledge, the Agricultural Commission also received only a high-level overview in Fall 2023. No drafts were shared, and while commissioners could ask questions, they were not given the opportunity to offer recommendations or raise concerns about potential impacts to agriculture.

My role at SVPA is centered on listening to and amplifying the voices of farmers. What I've consistently heard is that they did not feel meaningfully engaged in this process. And yet, these are the very people who manage the land and water every day—many of whom care deeply about ecological health and salmon recovery.

In fact, SVPA and the Snoqualmie Watershed Forum conducted a community-based social marketing study to understand farmers' motivations for riparian restoration. Nearly every participant cited environmental ethos and ecological function—such as habitat or water quality—as their primary motivator. These are not farmers who need to be coerced into stewardship; they are already participating, voluntarily, when engagement is collaborative and incentives are clear.

If SVPA, the FFF Farm Caucus, the Agricultural Commission, the Snoqualmie Valley Watershed Improvement District, SnoValley Tilth, and even King County Ag staff were not engaged—then I ask: who was?

Beyond the process, I want to raise a deeper concern about alignment with the collaborative Fish, Farm, Flood framework. Since 2013, the FFF caucuses and IOC have



worked together in good faith to balance agricultural viability, salmon recovery, and flood risk mitigation. That work led to Comprehensive Plan policies—including R-751—which direct King County, through this collaborative watershed planning process, to determine minimum acreage targets for agriculture and habitat in the Snoqualmie Valley Agricultural Production District (SVAPD), and to develop a tracking system to monitor land use.

Through years of work by the Buffers Task Force, the Buffer Implementation Task Force, and Agricultural Strategic Plan Task Force, we’ve identified how many acres are needed to maintain agriculture as the predominant land use in the SVAPD—while still meeting multi-benefit, variable-width buffer goals. What’s unclear is how this proposed ordinance—and the potential for mandatory buffer conversions—will be reconciled with those targets.

We urge the Council to ensure that any new buffer requirements are integrated into the existing framework, and that all land conversions—voluntary or mandated—are accurately tracked. If these regulatory changes are layered on without aligning with previous agreements, it risks unraveling over a decade of hard-won, consensus-based work.

Finally, I want to flag two outstanding concerns:

- The proposed definition of “commercial agriculture” is vague and the implications for farmers is unclear.
- And the new provisions could limit a farm’s ability to adapt to changing conditions—especially if adaptations aren’t already written into a farm plan. Since plans are tied to the individual, not the land, generational transitions could trigger new requirements, posing yet another hurdle for family farms.

Thank you for your time and your thoughtful consideration. We urge you to ensure this ordinance supports—not undermines—the future of agriculture in King County, and upholds the integrity of the collaborative processes that so many stakeholders have invested in.

Sincerely,  
Lauren

**Lauren Silver-Turner**  
*Executive Director*  
**Snoqualmie Valley Preservation Alliance**  
PO Box 1148, Carnation WA 98014  
c: (989) 464-1335 | o: (425) 549-0316 | w: [SVPA.us](http://SVPA.us)

**From:** [Peter Rimbos](#)  
**To:** [Legislative Staff, Council CompPlan](#)  
**Cc:** [Auzins, Erin](#); [Steadman, Marka](#); [Hollingshead, Libby](#)  
**Subject:** Public Comment--KCCP CAO Update  
**Date:** Saturday, April 12, 2025 11:21:04 AM  
**Attachments:** [KCCP CAO Upd-BAS--JRT Comments.pdf](#)

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KC Council KCCP Policy Staff,

On March 17 we submitted the attached **Written Comments** to the KC LS&L-U Committee. We are *re-submitting* the same comments in response to the April 16 Meeting Announcement on Committee's the Critical Areas Regulations Ordinance and Schedule Update, which we received yesterday, calling for Public Comment.

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

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**From:** [Carolyn Boatsman](#)  
**To:** [Legislative Staff, Council CompPlan](#); [KCC - Legislative Clerks - Distribution Group](#)  
**Cc:** [Proebsting, Robin](#); [Bowles, Mason](#)  
**Subject:** Comments draft critical areas regulations April 16, 2025 meeting of Local Services and Land Use Committee., Item 6  
**Date:** Wednesday, April 16, 2025 1:20:45 AM  
**Attachments:** [Comments LSLU meeting April 16 2025.docx](#)

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LSLU Committee Members:

My comments are attached. Thank you for considering!

Sincerely,

Carolyn Boatsman

**From:** [mthomas424](#)  
**To:** [Legislative Staff, Council CompPlan](#); [Communications, Comments](#)  
**Cc:** [Perry, Sarah](#); [Schneider, Lynn](#); [Marote, Corrina](#); [Mosqueda, Teresa](#); [Paige, Robby](#)  
**Subject:** Comment regarding Comp Plan Update: Critical Areas BAS Update Issues / Local Service & Land Use Committee 4/16 Comment  
**Date:** Wednesday, April 16, 2025 5:06:43 PM  
**Attachments:** [Objection to adoption of 2024 Comp Plan- .pdf](#)

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## Comment on Meeting on the Critical Areas Regulations Ordinance and Local Services and Land Use Committee 4/16

In furtherance to my verbal comment today (4/16)

There are problems with the critical areas update and critical aquifer recharge areas. The maps are in need of update, the methods behind the critical area definition are deficient and inconsistent with the Groundwater Management Plan in East King County such as rainfall, are questionable science by the updates own references, and implications of maps do not match actual experience and characteristics in the North Bend area.

Statements that critical aquifer recharge area maps do not need to be updated because the methodology King County uses has not changed does not consider the reality of well management and advances in wellhead protection mapping are questionable. Wells can be added, moved, changed, and abandoned. New mapping can become available changing to more advanced methods such as addressing topography and movement of groundwater. This means the underlying wellhead protection area may change and the critical aquifer recharge area change. The process by which wellhead protection areas are adopted is governed by WA DOH ODW as part of water system planning and the county reviews and approves water system plans which have wellhead protection as a component and subject to significant review.

There are expensive requirements to being mapped to a CARA; one of which from a septic system owners perspective is the requirement to reduce nitrates and arbitrarily set at <1 acre in KCC 21A.24.313-316; however, the method which is the basis of 1 acre is suspect... areas of the county get far more rainfall than the average used to make the 1 acre recommendation (and in East King County rainfall is part of the East King County Groundwater Management Plan), and areas such as North Bend (within East King County) are in topography (mountains) and have high horizontal movement of groundwater. There is no history of nitrate issues in public drinking water sources in North Bend and in the presence of 1000s of aging and basic septic systems that do little to address nitrates. Reducing nitrates in septic systems is expensive, and costs relative to very simple gravity systems owners currently have to one that reduces can be 10k's of dollars more... and not needed.

I attach an earlier memo which has additional information about the inadequacy of CARA methodology and BAS which are the basis of KCC 21A.24.313-316 and should be taken as comment on the land use and policy elements and critical area regulations update. It is very clear it is problematic and needs change to fairly address OSS costs and protect water resources.

Mrs. Perry's office has been previously contacted on the matter last year but there has been no followup. This issue can waste \$10k's per septic system and there are 1000s in North Bend

alone. I very much agree with remarks by the farmer who feels their rights are affected; septic owners in areas with no record of nitrate impacted public drinking water and supported by science and actual experience should not be faced with expensive requirements. An overarching theme expressed today by those speaking about the Snoqualmie Valley is the failure to engage those affected and I must agree.

Michael Thomas  
North Bend WA

**From:** [Auzins, Erin](#)  
**To:** [Legislative Staff, Council CompPlan](#)  
**Subject:** FW: 5-21-25 LSLU Written Public Comment - NONE  
**Date:** Wednesday, May 21, 2025 8:45:48 AM  
**Attachments:** [2024-0408 Dulin Written Comments.pdf](#)

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**From:** Steadman, Marka <Marka.Steadman@kingcounty.gov>  
**Sent:** Wednesday, May 21, 2025 8:36 AM  
**To:** Auzins, Erin <Erin.Auzins@kingcounty.gov>; Calderon, Angelica <Angelica.Calderon@kingcounty.gov>; Daly, Sharon <Sharon.Daly@kingcounty.gov>; Dunn, Reagan <Reagan.Dunn@kingcounty.gov>; Eccles, Cody <Cody.Eccles@kingcounty.gov>; Hollingshead, Libby <Libby.Hollingshead@kingcounty.gov>; House, Erin <Erin.House@kingcounty.gov>; Mosqueda, Teresa <Teresa.Mosqueda@kingcounty.gov>; Ngo, Jenny <Jenny.Ngo@kingcounty.gov>; Perry, Sarah <Sarah.Perry@kingcounty.gov>; Quinn, De'Sean <DeSean.Quinn@kingcounty.gov>; Steadman, Marka <Marka.Steadman@kingcounty.gov>; Swift, Bryndel (KCC) <Bryndel.Swift@kingcounty.gov>; Williams, Gabbi (she/her) <gabriela.williams@kingcounty.gov>  
**Subject:** 5-21-25 LSLU Written Public Comment - NONE

Attached is written public comment submitted in regard to today's Local Services and Land Use Committee meeting.

If part of the submission is an attachment to an email, double-click on the attachment to open it.

Marka

**From:** [Auzins, Erin](#)  
**To:** [Legislative Staff, Council CompPlan](#)  
**Subject:** FW: 5-21-25 LSLU Written Public Comment  
**Date:** Friday, May 23, 2025 8:43:59 AM  
**Attachments:** [2024-0408 Kreymer Comments.pdf](#)

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**From:** Steadman, Marka <Marka.Steadman@kingcounty.gov>  
**Sent:** Thursday, May 22, 2025 1:21 PM  
**To:** Auzins, Erin <Erin.Auzins@kingcounty.gov>; Calderon, Angelica <Angelica.Calderon@kingcounty.gov>; Daly, Sharon <Sharon.Daly@kingcounty.gov>; Dunn, Reagan <Reagan.Dunn@kingcounty.gov>; Eccles, Cody <Cody.Eccles@kingcounty.gov>; Hollingshead, Libby <Libby.Hollingshead@kingcounty.gov>; House, Erin <Erin.House@kingcounty.gov>; Mosqueda, Teresa <Teresa.Mosqueda@kingcounty.gov>; Ngo, Jenny <Jenny.Ngo@kingcounty.gov>; Perry, Sarah <Sarah.Perry@kingcounty.gov>; Quinn, De'Sean <DeSean.Quinn@kingcounty.gov>; Steadman, Marka <Marka.Steadman@kingcounty.gov>; Swift, Bryndel (KCC) <Bryndel.Swift@kingcounty.gov>; Williams, Gabbi (she/her) <gabriela.williams@kingcounty.gov>  
**Subject:** 5-21-25 LSLU Written Public Comment

Attached is an additional written public comment submitted in regard to yesterday's Local Services and Land Use Committee meeting.

Marka

**From:** [Auzins, Erin](#)  
**To:** [Legislative Staff, Council CompPlan](#)  
**Subject:** FW: MBAKS Written Comments re: Ordinance 2024-0408 (Critical Area Regulations)  
**Date:** Wednesday, May 28, 2025 3:57:40 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[2025\\_5-28 MBAKS King County LSLU Written Comments CAO BAS.pdf](#)

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**From:** Veronica Shakotko <Vshakotko@mbaks.com>  
**Sent:** Wednesday, May 28, 2025 3:56 PM  
**To:** Perry, Sarah <sarah.perry@kingcounty.gov>; Quinn, De'Sean <desean.quinn@kingcounty.gov>; Mosqueda, Teresa <teresa.mosqueda@kingcounty.gov>; Dunn, Reagan <reagan.dunn@kingcounty.gov>; KCC - Legislative Clerks - Distribution Group <kcccomitt@kingcounty.gov>  
**Cc:** Auzins, Erin <erin.auzins@kingcounty.gov>; Ngo, Jenny <jenny.ngo@kingcounty.gov>; Rowe, Mark <mrowe@kingcounty.gov>; Chan, Jim <Jim.Chan@kingcounty.gov>; Richardson, Leon <lrichardson@kingcounty.gov>  
**Subject:** MBAKS Written Comments re: Ordinance 2024-0408 (Critical Area Regulations)

Dear Chair Perry, Vice Chair Quinn, and Councilmembers,

Thank you for the opportunity to provide comments on Ordinance 2024-0408. As you consider updates to the Critical Areas Ordinance, we encourage you to carefully evaluate how the proposed changes may impact housing affordability, permitting timelines, and overall clarity in the development process.

MBAKS supports King County's efforts to update critical areas regulations in line with environmental goals. However, we also encourage the Council to consider how proposed changes may impact other key Growth Management Act (GMA) goals, including housing affordability, urban growth, timely permitting, and clarity in the development process.

In our attached comments, we raise concerns around implementation clarity, ambiguous language in key definitions, and the need for more predictable permitting requirements. We ask that the Council carefully evaluate proposed changes to setbacks, buffer widths, and mitigation standards—ensuring that any revisions are supported by best available science (BAS) and do not unintentionally increase housing costs or delays. We also want to express our strong support for the use of mitigation banks and other programmatic mitigation tools, which are recognized by state and federal agencies as more effective and predictable than traditional permittee-responsible approaches. Aligning with these modern practices would improve outcomes for both the environment and applicants.

We appreciate your work on this important update and are happy to serve as a resource as the process moves forward. If you have any questions, please don't hesitate to contact me at [vshakotko@mbaks.com](mailto:vshakotko@mbaks.com) or 425.435.8990.

Respectfully,  
Veronica



**Veronica Shakotko**  
Senior King County Manager  
Master Builders Association of King and Snohomish Counties  
m 425.435.8990  
335 116<sup>th</sup> Ave. SE, Bellevue, WA 98004

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