

King County Comprehensive Plan 2024 Update - Comment Tracking

NOTE Full comment text can be found in accompanying PDF.					
#	Comment	Name of Commenter	Topic	Format	Date Received
1	<p>Please find my comments below on the referenced section of the Comprehensive Plan:</p> <p>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</p> <p>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.</p> <p>Please find my comments below on the referenced section of the Comprehensive Plan:</p> <p>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,</p>	Jeffery Longstead	Wetlands	Written	12/12/2024
2	Verbal comment available at this link: https://king.granicus.com/player/clip/10867?meta_id=709775	Sandeep Bisla	Notification to homeowners	Verbal	2/19/2025

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3	<p>Thank you for the opportunity to comment on King County’s proposed draft Critical Areas Ordinance (CAO) as part of the periodic update required by the Growth Management Act (GMA). We have reviewed the draft CAO uploaded to PlanView (Submittal ID 2024-S-7674) on 10/29/2024 for 60-day review as well as the other documents uploaded.</p> <p>We greatly appreciate the efforts taken by the County during the drafting process to meet with the Department of Ecology (Ecology) several times and allow us to provide feedback on previous versions of the draft. On 08/16/2024 Ecology sent comments on the CAO draft dated March 2024 to the County. We appreciate that the feedback we gave on wetland banking was taken into consideration. The new language added in SECTION 71 that amends K.C.C 21A.24.340 allows applicants proposing “direct impacts to wetlands and wetland buffers” to use ratios “consistent with the approved mitigation banking instrument”. This change addresses our earlier concerns about making mitigation banks more available for all applicants, small and large, and the new language is a good improvement. However, we do have some concerns with parts of the final draft CAO submitted to PlanView. We would like to provide the following feedback and recommendations for consideration by the County before final adoption.</p> <p>21A.24.170 Notice of critical areas.</p> <p>(D)(2) The addition of language regarding the use of critical area maps and classification are good additions. However, we would also recommend making it clear that site conditions should be the deciding factor in determining presence of critical area location and classification, regardless of what adopted maps might say. Site conditions can change over time and the existing maps for wetlands can be out of date or have potentially inaccurate data. We would recommend including the following language from Wetland Guidance for Critical Areas</p> <p>Chris Jensen March 14th, 2025 Page 2</p> <p>Ordinance (CAO) Updates: Western and Eastern Washington1 (Ecology Publication #22-06-014) for clarity:</p> <p>“The presence of critical areas on a parcel triggers the requirements of this chapter, regardless of whether or not a critical area or buffer is depicted on an official map.”</p> <p>21A.24.325 Wetlands – buffers</p> <p>(A)(2) In our wetland guidance for CAOs document we recommend buffer table options that are based on our interpretation of best available science (BAS). King County appears to use Option 2 in the CAO with sufficient buffers based on intensity of land use. In our 08/16/2024 feedback we recommended that the County add additional specific land uses to the land use intensity table based on our guidance. In the PlanView draft CAO we support railroads and high use roads being added to high impacts. However, we still have concerns regarding “agricultural impacts without an approved farm management plan” being listed as moderate impact land use. Our feedback noted that “there are many agricultural uses that we would consider to be high impact use” and that we “highly recommend</p>	Emily Atkins	Notice and Wetlands	Written	3/14/2025

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4	<p>The Joint Rural Area Team (*) has completed its review of the subject document, as part of the 2024 King County Comprehensive Plan (KCCP) Major Update. The document offers a greater level of protection to critical areas in the County. Throughout, Best Available Science (BAS) is explained clearly, along with how it informs the regulations and protections with BAS sources noted. If there is a conflict with CAO/BAS application and other Growth Management Act goals, this is noted and explained. For example, buffers are smaller in Urban Areas to allow for the density of housing required. It is noted that planting vegetation in buffers may mitigate for some of the reduced size.</p> <p>However, we are very concerned the promise of this required CAO update will fall short without urgently needed major reform in the Department of Local Services, Permitting Division (DLS-P).</p> <p>Careful application of code, landowner assistance, updated materials and maps, adequate staff, and reliable and effective code enforcement are all needed, but wanting.</p> <p>It is a challenge to truly protect Critical Areas and allow use of private property. This has been a tension in unincorporated urban and rural King County since the Sensitive Areas Ordinance (SAO) was adopted nearly three decades ago. This update recognizes both and attempts to ensure a high level of Critical Area protection, while recognizing appropriate use within the structure of Growth Management. However, much about this is hard for citizens to understand and apply. While Stream and Wetland layers have been updated on King County I-Map, much new mapping is needed and we fear is years away. Materials for citizens all will need to be updated, when the CAO passes. It is truly a huge task for citizens to know how to apply the regulations. In fact, many spend significant money hiring consultants, surveyors, and/or scientists to help them through the regulatory process. Methods to defray some of these costs should be considered to help ensure citizen compliance. Ideally this would include: (1) adequately staffing DLS-P to provide assistance and guidance and (2) updating educational materials to be truly useful.</p> <p>Good intentions fail terribly without careful and consistent implementation, much of which is done through the permitting and code enforcement process. We continue to be deeply concerned that these critical functions are fundamentally broken and further complicated by recently State-mandated permit streamlining (which actually was proposed and passed to streamline permitting of needed housing in Urban Areas, but is being applied throughout unincorporated King County). We also understand attempts at improvement are underway, which we applaud, but we have yet to see any positive results. If anything, in particular cases, issues with permitting and code enforcement in rural King County are getting worse. Yet effective permitting and code enforcement are essential County services on which we all depend.</p>	Peter Rimbos	Implementation	Written	3/17/2025

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5	<p>On behalf of the Snoqualmie Indian Tribe (Tribe), please accept these comments on the 2025 updates to the King County Comprehensive plan and proposed ordinance 2024-0408. We appreciate the opportunity to provide these comments.</p> <p>The Snoqualmie Tribe is a federally recognized sovereign Indian Tribe and a signatory to the Treaty of Point Elliott of 1855, in which it reserved to itself certain rights and privileges and ceded certain lands to the United States. As a signatory to the Treaty of Point Elliot, the Tribe specifically reserved to itself, among other things, the right to fish at usual and accustomed areas and the “privilege of hunting and gathering roots and berries on open and unclaimed lands” off-reservation throughout the modern-day state of Washington (Treaty of Point Elliot, art. V, 12 Stat. 928). The Tribe has lived on, tended, and managed this land since time immemorial and the rivers, lakes, and surrounding lands are vitally important both ecologically and culturally.</p> <p>We appreciate and support King County’s commitment to strengthening environmental protections for critical areas and the use of Best Available Science (BAS) to protect functions and cultural values of critical areas, including streams and wetlands, and reduce negative effects of development. We also recognize the County heeded tribal consultation and addressed Indigenous Knowledge (IK) in the BAS review to inform these updates. To reiterate the comments recorded from previous consultation, Indigenous Knowledge is an aspect of BAS (Kassi et al. 2022; Whyte et al. 2015), and should be included as a core aspect in the development of rules, regulations, and projects, rather than as a secondary opportunity to add value. IK is itself a form of science that offers depths of insights through deep time and deep space methodologies, concepts, training, and experience that the Tribe gathered from the stewardship and conservation of their resources for thousands of years that only the Tribe holds and can provide. This should be included alongside BAS, gathered through consultation, which may come in the form of comment letters such as this current letter.</p> <p>Docusign Envelope ID: 57C6E13B-DD52-44DD-A8CA-0A40218DB07D</p> <p>Post Office Box 969 Snoqualmie, WA 98065 P: 425.888.6551 www.snoqualmietribe.us</p> <p>In reviewing the proposed ordinance 2024-0408, we commend the County for the revisions to provide more clarity and consistency in regulations and reporting requirements. These protections are necessary to help conserve ecological and hydraulic function and habitat in critical areas, which are essential for maintaining important fish, wildlife, and plant species. These species and places are not only ecological resources but are important cultural resources for the Snoqualmie Tribe. We support the requirement of mitigation sequencing and measures to ensure no loss of ecological function, expanded wetland buffers and riparian areas, and the inclusion of additional fish species beyond salmonids in stream considerations and clarification on identifying Type F waters.</p> <p>We do, however, suggest that the County could improve its inclusion of BAS and its protection of water quality by linking buffers (or, “management zones”) around water bodies explicitly to Site Potential Tree Height (SPTH), as recommended by the most recent guidance provided by Washington Department of Fish and Wildlife (Quinn et al. 2020, Rentz et al. 2020). The SPTH for western Washington ranges from 100 feet to 240 feet and does not distinguish between non-fish and fish-bearing streams, as intact riparian areas are vital to protecting ecological function for all streams. We recommend the adoption of the BAS and thus the utilization of the</p>	Snoqualmie Tribe	Various	Written	3/27/2025
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