King County Comprehensive Plan 2025 Update - Comment Tracking

*****NOTE*** Full comment text can be found in accompanying PDF.**

#	Comment	Name of Commente	Topic	Format	Date Received
1	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. 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	Jeffery Longstead	Wetlands	Written	12/12/2024
2	Verbal comment aviailable at this link: https://king.granicus.com/player/clip/10867?meta_id=709775	Sandeep Bisla	Notification to homeowners	Verbal	2/19/2025

King County Comprehensive Plan 2025 Update - Comment Tracking

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#	Comment	Name of Commente	Topic	Format	Date Received
3	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. 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. 21A.24.170 Notice of critical areas. (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 Chris Jensen March 14th, 2025 Page 2 Ordinance (CAO) Updates: Western and Eastern Washington1 (Ecology Publication #22-06-014) for clarity: "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." 21A.24.325 Wetlands – buffers (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	Emily Atkins	Notice and Wetlands	Written	3/14/2025

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4	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. 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). Careful application of code, landowner assistance, updated materials and maps, adequate staff, and reliable and effective code enforcement are all needed, but wanting. 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. 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	Peter Rimbos	Implementation	Written	3/17/2025

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#	Comment	Name of Commente	Topic	Format	Date Received
5	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. 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. 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. Docusign Envelope ID: 57C6E13B-DD52-44DD-A8CA-0A40218DB07D Post Office Box 969 | Snoqualmie, WA 98065 | P: 425.888.6551 | www.snoqualmietribe.us 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. 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	Snoqualmie Tribe	Various	Written	3/27/2025

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#	Comment	Name of Commente	Topic	Format	Date Received
6	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	Puget Sound Energy	Wildfires	Written	4/14/2025
6	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. [See Item 4 above]	Peter Rimbos	Implementation	Written	4/16/2025

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#	Comment	Name of Commente	Topic	Format	Date Received
7	Thank you for your work on the draft critical areas regulations and for the opportunity to comment. I would like to bring to your attention a section of the draft Critical Areas Regulations that will have negative effects upon wildlife - including anadromous fish. The draft includes a new definition: “Climate-smart plants: native plant species currently or prehistorically found within the surrounding ecoregion that are predicted to maintain their abundance under climate change, as identified by the department of natural resources and parks.” The definition unpacked: Climate smart plants are native plants, but then they can be plants that don’t even grow here now, such as prehistoric plants or plants from the vague “surrounding ecoregion”. They are identified by DNRP – instead of science - based upon how well they grow in a warming climate. What a departure for a department that has prided itself on good science and ecosystem protection over the decades! The rationale for climate-smart plants is to expand the list of allowable plant species for use in restoration and mitigation projects to improve survival in the face of climate change. Would that it were so simple as to swap out the plants for tougher ones! Would that “success” be defined as vigorous survival of plants without regard for the ecosystem! In reality, plants that have not co-evolved with local animals do not function as the foundation of the food web. Local insects are pretty picky about which plants they lay their eggs on. They have evolved so that their larvae can metabolize the myriad toxic substances in the leaves of local plants. When fewer native plants are present, insect populations decline, and every creature depending upon the insects, either directly, or in levels up, loses food. If this regulation is adopted, our fish and wildlife habitat conservation areas and our wetlands will be vegetated, at the discretion of permit holders, with sequoias, redwoods, gingkoes, and a whole collection of non-native plants each one relative non-participants in the local food web, depriving anadromous fish, birds, amphibians, birds, and mammals of their nutrition. No net loss? I doubt it. It was good news to read in the Seattle Times in March that foresters with DNRP have initiated a project to test the vigor of the tree seedlings that are native to King County but have been sourced from hotter, drier climates. The hope is that the trees will prove to be more resilient to the local climate of the future. This is a positive step that because it starts with seeking to support native species. It is consistent with the approach taken by federal and state land agencies for addressing stressed forests. This test should provide useful information for King County’s restoration regulations. But bottom line, functioning ecosystems must be the goal, not convenient non-native plant choices left up to permit holders. Executive staff-proposed changes to the definition do not lessen the harm of the proposed code amendment. The modifications don’t change the fact that DNRP proposes to upend the food chain. I recommend that the Council insist that DNRP staff detail the sections of the Best Available Science Report that support substitution of native plants with non-native plants in revegetating fish and wildlife habitat	Carolyn Boatsman	Climate-smart Plants	Written	4/16/2025

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#	Comment	Name of Commente	Topic	Format	Date Received
8	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?	Lauren Silver-Turner	Fish Farm Flood	Written	4/16/2025

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#	Comment	Name of Commente	Topic	Format	Date Received
9	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 mappjng 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 pand 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 methodolgy 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	Michael Thomas	CARAs	Written	4/16/2025
10	Verbal comment aviailable at this link: https://king.granicus.com/player/clip/10930?meta_id=715210	Erin Erickson	Fish Farm Flood	Verbal	4/16/2025
11	Verbal comment aviailable at this link: https://king.granicus.com/player/clip/10930?meta_id=715210	David Haakenson	Critical Area Buffers	Verbal	4/16/2025
12	Verbal comment aviailable at this link: https://king.granicus.com/player/clip/10930?meta_id=715210	Carolyn Boatsman	Climate-smart Plants	Verbal	4/16/2025
13	Verbal comment aviailable at this link: https://king.granicus.com/player/clip/10930?meta_id=715210	Michael Thomas	CARAs	Verbal	4/16/2025
14	Verbal comment aviailable at this link: https://king.granicus.com/player/clip/10930?meta_id=715210	Rachel Shepard	CARAs	Verbal	4/16/2025
15	Verbal comment aviailable at this link: https://king.granicus.com/player/clip/10930?meta_id=715210	Lauren Silver-Turner	Fish Farm Flood	Verbal	4/16/2025
16	Verbal comment aviailable at this link: https://king.granicus.com/player/clip/10930?meta_id=715210	Cory Hutichinson	Critical Area Buffers	Verbal	4/16/2025

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17	The Washington State Department of Transportation (WSDOT) appreciates the opportunity to provide additional comments on the proposed ordinance (2024-0408) that revises the King County's Critical Area Ordinance (CAO). WSDOT offers the following comments and recommendations on the proposed CAO revisions. Wetland Mitigation 1) Mitigation Banks and Advance Mitigation Ratios (Section 71 – K.C.C. 21A.24.340) WSDOT supports the proposed inclusion of mitigation bank ratios that are in line with a bank's approved Mitigation Banking Instrument (MBI). However, there are two issues that remain unresolved and require additional guidance. a. Bank ratios for Wetland Buffers. The proposed CAO updates state that direct impacts to wetland and wetland buffers shall be consistent with the MBI ratios, but that direct permanent wetland impacts would not be less than one credit to one acre of impact (Section 71, E.1.a). However, it is not clear if this 1:1 minimum threshold also applies to permanent direct wetland buffer impacts as well. This needs further clarification to avoid confusion. It is our recommendation that language be added that states compensatory buffer mitigation would follow what is recommended in the MBI. The approved mitigation banks in King County range from four to five acres of buffer mitigation per one credit. As written, it would be easy to misconstrue the code to be requiring a 1:1 minimum credit-to-acre mitigation for buffer impacts, which would result in at least a 4:1 acre-to-acre mitigation requirement. b. Ommission of Advance Mitigation. Permittee-responsible advance mitigation is a great tool for both applicants and regulators to expedite project review and permitting, while providing ecological benefits prior to project impacts. Like mitigation banks, advance mitigation sites are built at least two years prior to project impacts, if not further in advance, and replaces lost wetland functions sooner than concurrent compensatory mitigation, demonstrating site success prior to using credit generated from the site. Advance mitigation reduces temporal loss and risk of failure, which are the two key factors that define mitigation ratios. Currently, the proposed CAO updates do not provide any guidance on using advance mitigation. This omission discourages the use of this beneficial practice by WSDOT and many others developing projects in King County. We recommend adding language for reduced ratios that are in line with Chapter 4.2.2 Advance Mitigation in the Wetland Mitigation in Washington State: Part 1 – Agency Policies and Guidance (Version 2) (Ecology et al. 2021). 2) Credit-Debit Method for Permittee-Responsible Compensatory Mitigation (Section 71 - K.C.C. 21A.24.340) The proposed Section 51, D.5.b states that the Credit-Debit method may be used in the ecological critical area report to determine no net loss of functions and values. However, the mitigation section (Section 71) does not mention the Credit-Debit method at all. Ecology's development of this method was with the intention of it being used as a more accurate way of calculating the replacement of wetland impacts instead of using traditional compensatory mitigation ratios. This method represents the best available science from Ecology for determining functional replacement of impacts and accounts for temporal loss, risk of failure, functional lift of restoration, and other metrics that	WSDOT	Wetlands and Riparian Areas	Written	5/21/2025
	Verbal comment aviailable at this link: https://king.granicus.com/player/clip/10976?meta_id=718345	David Haakenson	Critical Area Buffers	Verbal	5/21/2025
	Verbal comment aviailable at this link: https://king.granicus.com/player/clip/10976?meta_id=718345	Lauren Silver-Turner	Fish Farm Flood	Verbal	5/21/2025

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#	Comment	Name of Commente	Topic	Format	Date Received
18	My name is Darya Kreymer, and I am a high school student at Cedarcrest High School, Duvall, and I am writing in support of Proposed Ordinance 2024-0408, which updates the Critical Areas Ordinance (CAO) and advances King County's 2025 Comprehensive Plan. As a resident of Duvall, who deeply values the environmental sustainability and responsible land use planning of our county, I believe this ordinance represents a necessary and science-driven step forward to protect our region's public health, safety, and natural ecosystems, and should be adopted and implemented. One of the key strengths of Proposed Ordinance 2024-0408 is its comprehensive approach to strengthening protections for King County's critical areas, places like wetlands, streams, steep slopes, and other high-risk or environmentally sensitive zones. These are the parts of our landscape that help prevent flooding, support biodiversity, and maintain water quality, yet they are often the most vulnerable to damage from development. I support this ordinance because it directly responds to those risks by expanding buffer zones around sensitive areas, increasing mitigation standards, and applying updated science to determine how these areas should be protected. These steps will help prevent irreversible environmental harm and ensure development happens responsibly. I also strongly agree with the inclusion of new hazard classifications like tsunamis and alluvial fan zones. These additions show that the County is planning for future risks, not just reacting to current ones. Including these areas in the code means future development will need to account for real geological dangers, protecting both people and property. It also shows that the County is taking seriously its responsibility to use the best available science to guide policy, something that I believe is crucial in an era of increasing climate uncertainty. Additionally, the added definitions and reporting standards help avoid confusion and give professionals the tools they need to do their work accurately. As someone who supports clear environmental policy, I think these updates make the code easier to follow while still holding projects to high standards. I'm also glad to see that the ordinance removes outdated or little-used programs like the Rural Stewardship Plans and instead offers updated tools that give flexibility to homeowners, farmers, and restoration efforts. This is a	Darya Kreymer	Support for Ordinance	Written	5/22/2025

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#	Comment	Name of Commente	Topic	Format	Date Received
19	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 or 425.435.8990. With nearly 2,500 members, the Master Builders Association of King and Snohomish Counties (MBAKS) is the largest local homebuilders' association in the United States, helping members provide a range of housing choice and attainability. MBAKS welcomes the opportunity to provide comments on the proposed draft ordinance 2024-0408 amending the King County Critical Area regulations. Balancing Critical Area Updates with GMA Goals The Growth Management Act (GMA) outlines 15 planning goals to help guide comprehensive plans and development regulations. These goals are not ranked by priority and are intended to be balanced to reflect each community's needs. MBAKS supports Goal 10: "Protect and enhance the environment and the state's high quality of life." However, as the Council considers updates to critical areas regulations, we urge you to also weigh how these changes could affect other key GMA goals, including: • Goal 1: Urban Growth. Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner. • Goal 4: Housing. Plan for and accommodate housing affordable to all economic segments of the population of this state, promote a	Master Builders Association of King and Snohomish Counties	Various	Written	5/28/2025

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#	Comment	Name of Commente	Topic	Format	Date Received
20	Thank you for the opportunity to provide comments regarding the proposed Striking Amendment S1 to King County's Critical Areas Ordinance in preparation for your discussion on the July 16 agenda. We appreciate the County's continued effort to modernize its critical areas regulations and the thoughtful work of the Local Services and Land Use Committee in developing the proposed amendment. Our letter acknowledges several positive elements in the striking amendment, including improved organization, procedural transparency around habitat updates, and the County's ongoing public engagement. At the same time, we outline a several remaining concerns about the potential impacts on housing feasibility, particularly in urban and infill areas. Key issues include: Expanded buffer widths that may reduce buildable land area without localized performance data Vague permitting language and unclear report standards that could delay project approvals A preference for on-site mitigation that diverges from current state and federal policy New hazard area restrictions that lack publicly available mapping or transparent criteria The absence of SEPA exemptions, which have proven effective in streamlining permitting in other jurisdictions MBAKS remains committed to working collaboratively with Council and staff to ensure the final ordinance supports both critical area protection and the production of attainable housing. If you have any questions, please don't hesitate to contact me at vshakotko@mbaks.com or 425.435.8990. The Master Builders Association of King and Snohomish Counties (MBAKS), with nearly 2,500 members, is the largest homebuilders' association in the U.S., helping to provide diverse housing choices and attainability. We aim to be the region's most trusted housing experts and believe everyone deserves a place to call home. MBAKS thanks you for your continued work to modernize King County's critical areas regulations. We appreciate the thoughtful effort behind the proposed Striking Amendment S1 and recognize the challenge of balancing environmental protection, legal compliance, and community needs. While we support the County's goal of aligning with best available science and state law, we remain concerned that several provisions in the revised draft could unintentionally hinder housing production, especially in urban and infill contexts. Growth Management Act (GMA) Balance	Master Builders Association of King and Snohomish Counties	Various	Written	7/15/2025
	Verbal comment avialable at this link: https://king.granicus.com/player/clip/11040?meta_id=723463	Mike Thomas	CARAs	Verbal	7/16/2025
	Verbal comment avialable at this link: https://king.granicus.com/player/clip/11040?meta_id=723463	Terry Lavender	Enforcment and	Verbal	7/16/2025
	Verbal comment avialable at this link: https://king.granicus.com/player/clip/11040?meta_id=723463	Evan Dulin (WSDOT)	Mitigation	Verbal	7/16/2025

King County Comprehensive Plan 2025 Update - Comment Tracking

NOTE Full comment text can be found in accompanying PDF.

#	Comment	Name of Commente	Topic	Format	Date Received
21	We have a few questions about the code change to the critical areas part of the plan. To give you background: We have a new house project that we are preparing to submit to the building department.. Critically, with this specific property and the impacts of the critical areas change, the property will become unbuildable after the code change. 1.Will the changes apply as of the day/time of the vote, or will they apply at some later date? If so, is there a specified later date yet? Is the vote expected to be delayed again? 2.Vesting. With the new law requiring permits to be processed faster, King County permit reviewers are now using the “screening” period (where they check for application completeness before they officially accept the permit) as a much longer and more ambiguous timeline where they could ask for all sorts of new things from the applicant that they normally would ask for during permit review time. We prepare very thorough applications, but with the recent staff changes, the items being asked for are not the same reviewer to reviewer, so we have not been able to adequately predict what they will expect on top of standard application items. This is a problem relating to the comp plan because a project is not “vested” into the current code until it passes screening. We are planning to submit in August to give it plenty of time to go through screening before the Dec 2nd vote, but we are concerned with the ambiguous amount of screening time, we will possibly lose the whole project if the screeners ask for something that we cannot produce in the time remaining (such as revisions to complex consultant reports, for instance). Until the code change is official, can Council either A) add an amendment that will allow for vesting at time of submittal for projects that will be adversely affected by the code change and have made a best effort to be accepted in time or B) permit the building officials to allow earlier vesting at their discretion during this time.	Nicole McKernan	Vesting	Written	7/16/2025

King County Comprehensive Plan 2025 Update - Comment Tracking

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#	Comment	Name of Commente	Topic	Format	Date Received
22	On behalf of the Muckleshoot Indian Tribe, I write to respectfully comment on the Striking Amendment to the 2025 Comprehensive Plan & Critical Areas Regulations Ordinance. Both the King County Comprehensive Plan and the Critical Areas Regulation Ordinance reference Indian tribes, and respectfully include tribes in planning related matters; however, neither clearly define Indian tribes as those that are federally recognized. The Muckleshoot Tribe encourages King County to define Indian tribes as "federally recognized Indian tribes" at the outset of the Critical Areas Regulations Ordinance, and to limit consultation and comment solicitation to tribes that are federally recognized. Tribes that are federally recognized retain certain rights as sovereign political nations that other groups do not. The rights reserved by the treaties and the principles of self-government are fundamentally linked to recognition as a sovereign political entity. Tribal heritage groups push to overlook established criteria for tribal recognition and equate their heritage-based voluntary groups with legitimate Indian tribes; doing so risks undermining the very principles of tribal sovereignty. This not only diminishes the inherent value of tribal governance but also jeopardizes the vital government-to-government relationship that exists between the County and legitimately recognized Indian tribes. Thus, we ask that King County defines Indian tribe in its Critical Areas Regulations Ordinance as "federally recognized Indian tribes," or change the language to "federally recognized Indian tribe" anywhere where "Indian tribe" is referenced. These references exist on the following pages of the Striking Amendment: Page 93, Section 45b editing KCC 21A.24.045 (here, in fact, the Striking Amendment proposes to strike "federally recognized tribe" and replace it with "Indian tribe".) Page 118, Section 51(C)(2)(a) Page 150, Section 63(C}{2)(a) Page 237, Section 96 (does reference treaty fishing rights) Page 241 (does reference treaty fishing rights) We appreciate your leadership and commitment to honoring tribal sovereignty and commend you on King County's current efforts to honor true government-to-government relations.	Muckleshoot Indian Tribe	Terminology	Written	8/5/2025

King County Comprehensive Plan 2025 Update - Comment Tracking

*****NOTE*** Full comment text can be found in accompanying PDF.**

#	Comment	Name of Commente	Topic	Format	Date Received
23	Thank you for your continued work on the Critical Areas Ordinance update. On behalf of the Master Builders Association of King and Snohomish Counties, I'm writing to share a supplemental comment letter (attached) in response to the August 20 LSLU packet and the latest version of Ordinance 2024-0408. We appreciate the County's effort to modernize these regulations and recognize the thoughtful refinements made throughout the process. However, we remain concerned that several provisions, if not further clarified or adjusted, could limit housing feasibility, especially for smaller, urban, and infill sites. Key concerns outlined in the attached letter include: •Expanded buffers that may significantly reduce buildable area, particularly on constrained urban parcels •Unclear or unmapped geologic hazard areas that could restrict development without sufficient transparency or predictability •Added septic regulations in aquifer recharge zones that go beyond state standards and may increase rural housing costs •Overreliance on onsite mitigation can block small projects where offsite mitigation tools are more viable •Unclear critical area reporting requirements that introduce cost and delay for homeowners and smaller builders •Lack of transition mapping or timing may result in confusion or project denial if standards shift mid-application As the Council moves toward final adoption, we urge further refinements to ensure the ordinance supports both environmental protection and housing opportunity across King County. Please don't hesitate to reach out if we can provide additional detail or serve as a resource. We look forward to continued collaboration.	Vanessa Shakoto	Various	Written	8/19/2025

King County Comprehensive Plan 2025 Update - Comment Tracking

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#	Comment	Name of Commente	Topic	Format	Date Received
24	Thank you for the opportunity to comment on Proposed Ordinance No. 2024-0408, an ordinance related to critical area regulations, the Striking Amendment S1, and other amendments. We appreciate the opportunity to comment on the proposed ordinance. Overall, Futurewise strongly supports the update. We do have some comments and suggestions below. It is important to remember that this is a once in ten years update to the critical areas regulations and we need to get the update right. Futurewise works throughout Washington State to support land-use policies that encourage healthy, equitable and opportunity-rich communities, and that protect our most valuable farmlands, forests, and water resources. Futurewise has members and supporters throughout Washington State including King County. Summary of the Recommendations □ Futurewise supports basing riparian buffers on the latest best available science to protect Chinook habitat and other aquatic habitats. We recommend incorporating the State of Washington Department of Fish and Wildlife's recommendations that the buffers for rivers and streams be one 200-year site-potential tree height (SPTH) in width on both sides of the water body and that this width should be measured from the edge of the channel, channel migration zone, or floodplain whichever is wider throughout unincorporated King Comments on Proposed Ordinance No. 2024-0408, an ordinance related to critical area regulations August 19, 2025 Page 2 County. 1 This buffer is necessary to prevent a loss of fish and wildlife habitat. Please see page 3 of this letter for more information. □ Retain the Executive recommended 15 foot setback in K.C.C. 21A.24.200 and increase it to 30 feet from critical areas buffers in areas susceptible to wildfire. These setbacks will protect people and property from wildfires by allowing clear zones to reduce the potential that wildfires will spread to homes. They will also protect critical area buffers from damage as residents try to protect their homes. Please see page 7 of this letter for more information. □ Designate and protect rare plant categories and listings from the Department of Natural Resources Natural Heritage Program as the GMA requires. This will protect rare plants and the animal species and people that depend on the plants. Please see page 7 of this letter for more information. □ Futurewise supports designating and regulating alluvial fans. Alluvial fans are hazardous locations on which to build. Designating them as geologically hazardous areas will protect people and property. Please see page 8 of this letter for more information. □ Require case-by-case determinations of landslide buffers based on the risk to the proposed development. This will better protect people and property. Please see page 8 of this letter for more information.	Tim Trohimovich	Various	Written	8/19/2025

King County Comprehensive Plan 2025 Update - Comment Tracking

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#	Comment	Name of Commente	Topic	Format	Date Received
25	I am writing regarding Proposed Ordinance 2024-0408, which updates critical area regulations for the 2025 Comprehensive Plan. The July 16, 2025, Local Services and Land Use Committee meeting packet outlines the ordinance's purpose but does not provide specific details about Striking Amendment S1 (released July 15, 2025) or the public line amendments (released August 15, 2025). I request the full text of these amendments, particularly details on changes to buffer widths and sizes for wetlands, streams, floodplains, and steep slopes. For example, I am interested in any modifications to minimum buffer requirements or conditions for buffer averaging, as these directly impact environmental protection and development. Please make these details available on the council's website. (https://kingcounty.gov/en/dept/council/governance-leadership/county-council/useful-links/comprehensive-plan/2025) or provide them upon request. Prior to final passage, comments and concerns of impacted property owners should be specifically addressed. In general, a perceived lack of engagement with various property owners and their concern for their property rights is not adequately considered or presented to property owners by the county. Concerns range from buffer widths through impact to farming, development, to concisely and accurately mapped CARAs, public line amendment availability is needed for an informed analysis by the public. Attending to the lack of readily available, accessible, and easily located information for the public would comply with the need to provide clear and specific details to documents that are placed on the county website. The lack of specifics in the information presently provided with an abundance of language (more than 800 pages in one document, and over 400 pages in another) in CAO update documents and related published documents is an oversight that must be rectified. With improvements, we could thank you for ensuring transparency in this process.	Cindy Alia	Buffers	Written	8/19/2025

King County Comprehensive Plan 2025 Update - Comment Tracking

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#	Comment	Name of Commente	Topic	Format	Date Received
26	On behalf of the Citizens' Alliance for Property Rights (CAPR), King County Chapter as the new President, I submit the following written comments to be entered into the record regarding the August 20, 2025 Local Services and Land Use Committee meeting packet and agenda. CAPR represents property owners and small business stakeholders across King County who are deeply concerned about the ongoing erosion of private property rights under the guise of "comprehensive planning," "equity," and "environmental stewardship." I. Accessibility and Transparency Failures The meeting materials for this agenda exceed 800 pages, filled with technical amendments to dozens of code provisions. This sheer volume and complexity makes it impossible for the average property owner to meaningfully participate. When King County produces documents of this size, written in bureaucratic and legal jargon, it effectively denies citizens the ability to understand or challenge the policies being advanced. Public comment under these circumstances becomes a hollow procedural checkbox, not a meaningful consultation. This lack of accessibility undermines public trust in the process and raises serious questions about whether the Council is meeting its obligations for transparency and fair notice. II. Predetermined Outcomes CAPR has observed that Comprehensive Plan amendments and Critical Areas Ordinance (CAO) updates follow a familiar pattern: lengthy public comment processes are held, yet the final outcome has already been decided. Language is adjusted for optics, but the core policy direction remains unchanged. This meeting continues that pattern. The Council has already signaled support for the 30-Year Forest Plan, the expansion of critical areas regulations, and new monitoring and adaptive management systems. Citizens are asked to engage, but the decisions are preordained. This undermines democratic legitimacy. III. Critical Areas Ordinance Expansion (Ordinance 2024-0408) The proposed amendments to K.C.C. 21A and related provisions represent a significant expansion of the CAO. Each update imposes greater restrictions: larger buffers, more setbacks, reduced buildable land, and heightened permitting requirements. Particularly troubling is the incorporation of "adaptive management" provisions, which allow unelected staff to impose further restrictions without direct Council vote or meaningful public oversight. This creates open-ended regulatory power over private property and amounts to a regulatory taking without compensation, contrary to both state and federal constitutional protections. For rural property owners in unincorporated King County, this translates into a loss of use, value, and economic opportunity. These	Domnique Scarimbolo	Various	Written	8/19/2025

King County Comprehensive Plan 2025 Update - Comment Tracking

*****NOTE*** Full comment text can be found in accompanying PDF.**

#	Comment	Name of Commente	Topic	Format	Date Received
27	Comments regarding the proposed Critical Areas Ordinance updates 2025 As farmers and property owners in unincorporated King County, we demand that the 2025 Critical Areas Ordinance (CAO) update, including Striking Amendment S1 to Proposed Ordinance 2024-0408, address our concerns to protect our livelihoods and property rights. As public servants, you are accountable to us, not to speculative environmental policies. The CAO's reliance on the precautionary principle, which imposes restrictions without proving specific harm from our land use, erodes the essential nexus test required by law, risking unconstitutional takings. Below are our concerns and demands for a fair and balanced CAO. CAPR Concerns: 1. Expanded Buffer Widths Reducing Usable Land Buffer increases (e.g., 100–225 feet for wetlands, 50–150 feet for streams) drastically cut arable and developable land, reducing a 10-acre farm's usable area by 30–50% and limiting construction. This threatens our $150 million agricultural economy and property values. The precautionary approach, lacking a clear cause-and-effect link to our activities, unjustly restricts our land. We demand site-specific buffer adjustments, universal flexibility beyond Agricultural Production Districts, and proof of harm per the essential nexus test. 2. Costly and Complex Permitting Processes Stricter permitting, with environmental assessments costing $5,000–$20,000, burdens small farmers and owners, delaying projects by 6–12 months. These costs, driven by precautionary regulations, hinder farm upgrades and development without proven necessity. Simplify permitting, provide subsidies, and ensure restrictions are tied to specific impacts, as required by law. 3. Economic Impacts on Property Value and Farm Profitability Buffer expansions and zoning restrictions reduce property values (e.g., 40% loss on a 5-acre parcel with a 2-acre buffer), threatening financial stability. Precautionary rules, lacking a nexus to our land use, risk takings without compensation. Implement tax relief or	Cindy Alia	Buffers	Written	9/1/2025
28	I have attached comments regarding the climate adaptive plants amendment in the critical areas update. I have testified several times over the past year in opposition to the proposed amendment. It would allow the substitution of non-native "climate adaptive" plants for native plants when revegetating critical areas where native plants are currently required. I regret that I was not able to testify at the Local Services and Land Use Committee regarding this topic in recent months. I was responsible for a person who had suffered a severe stroke. I have however carefully reviewed recent updates to the code language. Please feel free to contact me if you have questions regarding my comments or wish to request information or clarification.	Carolyn Boatsman	Climate-smart Plants	Written	9/22/2025

King County Comprehensive Plan 2025 Update - Comment Tracking

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#	Comment	Name of Commente	Topic	Format	Date Received
29	The attached comments are a revision of those I sent on 9/22/25. The revision is for clarification and ease of access to the topics addressed in the comments. The comments start out with a list of topics. Proposed amendments are attached as appendices to the comments. An informal compilation of federal and state agency views on assisted migration is included. I have done my best to effectively explain the downsides of the proposed amendment, lack of scientific support for it, and lack of conformance with the GMA. The key point, however, is that it would be the County's role to demonstrate that the the proposed amendment is scientifically supported does meet GMA requirements. I don't think that has been accomplished. Is a revised Best Available Science report likely to be released? If so, when would that likely occur? On what date will a revised amendment be released to the public? I would appreciate discussion with King County Council Members, Council staff, and department staff. These comments include: 1.Introduction 2.Recommendation 3.Washington Administrative Code (WAC) requirements compared to King County Best Available Science Report 4.State Guidance (Departments of Ecology and Fish and Wildlife) 5.Background regarding native plants and wildlife 6.Examples of insect productivity from native and non-native plants 7.A closer examination and critique of Section 63 in the draft critical areas update 8.Concerns with the definition for "Climate-adaptive plants" New Section 15 9.Integration of the climate adaptive plants amendment into CAO sections 10.Two different approaches in the Department of Natural Resources and Parks 11.Conclusion 12.Disclaimer 13.Appendices A, B, and C – Proposed amendments and context note	Carolyn Boatsman	Climate-smart Plants	Written	10/2/2025

King County Comprehensive Plan 2025 Update - Comment Tracking

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#	Comment	Name of Commente	Topic	Format	Date Received
30	Please accept the Joint Team [*] Comments (attached) regarding the proposed Critical Areas Monitoring and Adaptive Management Plan, part of the Critical Areas Ordinance (CAO) Update before you and soon to be the subject of a Public Hearing. Previously we provided you and your Local Services and Land-Use Committee both Oral and Written Comments on the CAO Update and Best Available Science (these included: Joint Team CAO/BAS Comments and Joint Team 2024 KCCP Major Update CAO/BAS Comments, when we were the Joint Rural Team before expanding to include three Urban Unincorporated Area Organizations earlier this year and becoming the Joint Team). Even though technically part of the 2025 King County Comprehensive Plan (KCCP) Annual Update, we consider the CAO Update an important last step of the 2024 KCCP Major Ten-Year Update, for which we began our participation, including thorough review and comment, back in early 2022. Thank you in advance for your due consideration of our attached Comments. The Joint Team represents ten Rural Area Organizations and three Urban Unincorporated Organizations throughout King County. Our organizations and their members have significant knowledge and history with past Critical Area regulations and their implementation. As a followup to our extensive work on the 2024 KCCP Major Ten-Year Update, we have reviewed the "Best Available Science Review and Updates to the Critical Areas Protection Report," "SEPA Checklist," "Riparian Analysis Process and Parameters," "SEPA Determination of Non-Significance," and other relevant materials associated with the CAO Update (Update). In general, the Update is very good and offers a greater level of protection to critical areas in the County. Best Available Science is clearly explained, along with how it informs the regulations and protections. If there is conflict with other Growth Management Goals, it is explained and noted. For example, buffers are smaller in urban areas to allow housing density, while increased vegetation in those buffers is recommended to improve the protection. We applaud the extensive use of non-regulatory measures throughout. These include new and improved mapping, the Land Conservation Initiative, Public Benefit Rating System (PBRS), and the reduction from 10 ac to five ac for Rural Open Space eligibility, stormwater management, flood management planning, Farm and Forest Management Plans, restoration of damaged critical areas, and other proven strategies. All of these measures have multiple benefits, yet provide some flexibility, while still ensuring compliance. We are especially pleased with the "Critical Areas Monitoring and Adaptive Management Program Plan (Plan)" as submitted to the Council on June 30th by the Executive. The Four Tasks outlined	Peter Rimbos	Support for Ordinance	Written	10/16/2025

King County Comprehensive Plan 2025 Update - Comment Tracking

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#	Comment	Name of Commente	Topic	Format	Date Received
31	Thank you again for sharing the essence of the Snoqualmie Tribe's comments regarding the draft amendment of the critical areas regulations, in which they requested; 1. Tribal consultation in the development of the climate-adaptive plant list; and 2. The requirement for revegetation with native species. In thinking about the Snoqualmie Tribe's requests, I wanted to point out that the amendment, as it stands, would not "require revegetation with native species", as they request. It is important to note that the amendment, though offering native plants as an option and a vaguely stated priority, does not require them. Here is the text in NEW SECTION 63: 4. Use only native or climate-adaptive plant species that are well suited to thrive in the current and future site conditions; 5. Prioritize the selection of native vegetation, with the use of climate-adaptive plants only when appropriate for site conditions; Wherever, throughout the critical areas regulations, when reference is made to revegetation, the two options are presented equally. I wanted to offer a possible amendment to the existing draft that might save a lot of confusion and work for staff and permit applicants. It would likely resolve concerns about undercutting the food web. It would result in a useful list, which you've mentioned Council Member Perry thinks a good idea. I think that it would allow an administrative rule for a list of plants rather than a public rule. NEW IDEA: Today I was researching the incidence of Puget Sound native plants that are also native to surrounding ecoregions. I used the National Wildlife Federation's Native Plant Finder and compared tree species that are favorites of moths (butterflies) and form the foundation of the food web. There is a lot of co-incidence of these plants, not new information for County ecologists. And I was only looking at trees. Yet, I was thinking about it in a new way. Roughly summarized, when comparing my zip code in King County to Wenatchee zip code 98801, I found 13 native trees in common	Carolyn Boatsman	Climate-smart Plants	Written	10/22/2025