

# King County Comprehensive Plan 2025 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</p>	Jeffery Longstead	Wetlands	Written	12/12/2024
2	Verbal comment available at this link: <a href="https://king.granicus.com/player/clip/10867?meta_id=709775">https://king.granicus.com/player/clip/10867?meta_id=709775</a>	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.</p> <p>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 Washington<sup>1</sup> (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</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</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   <a href="http://www.snoqualmietribe.us">www.snoqualmietribe.us</a></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</p>	Snoqualmie Tribe	Various	Written	3/27/2025

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6	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>As we approach the summer, here are some steps you can take to prepare for peak wildfire</p>	Puget Sound Energy	Wildfires	Written	4/14/2025
6	<p>On March 17 we submitted the attached Written Comments to the KC LS&amp;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.</p> <p>[See Item 4 above]</p>	Peter Rimbo	Implementation	Written	4/16/2025

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7	<p>Thank you for your work on the draft critical areas regulations and for the opportunity to comment.</p> <p>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.</p> <p>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."</p> <p>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!</p> <p>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!</p> <p>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, ginkgoes, 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.</p> <p>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.</p> <p>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</p>	Carolyn Boatsman	Climate-smart Plants	Written	4/16/2025

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8	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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?</p>	Lauren Silver-Turner	Fish Farm Flood	Written	4/16/2025

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9	<p>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.</p> <p>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.</p> <p>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 &lt;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.</p> <p>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.</p> <p>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;</p>	Michael Thomas	CARAs	Written	4/16/2025
10	Verbal comment available at this link: <a href="https://king.granicus.com/player/clip/10930?meta_id=715210">https://king.granicus.com/player/clip/10930?meta_id=715210</a>	Erin Erickson	Fish Farm Flood	Verbal	4/16/2025
11	Verbal comment available at this link: <a href="https://king.granicus.com/player/clip/10930?meta_id=715210">https://king.granicus.com/player/clip/10930?meta_id=715210</a>	David Haakenson	Critical Area Buffers	Verbal	4/16/2025
12	Verbal comment available at this link: <a href="https://king.granicus.com/player/clip/10930?meta_id=715210">https://king.granicus.com/player/clip/10930?meta_id=715210</a>	Carolyn Boatsman	Climate-smart Plants	Verbal	4/16/2025
13	Verbal comment available at this link: <a href="https://king.granicus.com/player/clip/10930?meta_id=715210">https://king.granicus.com/player/clip/10930?meta_id=715210</a>	Michael Thomas	CARAs	Verbal	4/16/2025
14	Verbal comment available at this link: <a href="https://king.granicus.com/player/clip/10930?meta_id=715210">https://king.granicus.com/player/clip/10930?meta_id=715210</a>	Rachel Shepard	CARAs	Verbal	4/16/2025
15	Verbal comment available at this link: <a href="https://king.granicus.com/player/clip/10930?meta_id=715210">https://king.granicus.com/player/clip/10930?meta_id=715210</a>	Lauren Silver-Turner	Fish Farm Flood	Verbal	4/16/2025
16	Verbal comment available at this link: <a href="https://king.granicus.com/player/clip/10930?meta_id=715210">https://king.granicus.com/player/clip/10930?meta_id=715210</a>	Cory Hutchinsonson	Critical Area Buffers	Verbal	4/16/2025