



**King County**

2024 King County  
Comprehensive Plan Update

# Draft Environmental Impact Statement Public Comments Report

02/28/2024

## I. Overview

King County is updating its comprehensive plan consistent with the Washington State Growth Management Act (GMA), Revised Code of Washington (RCW) Chapter 36.70A. The King County Comprehensive Plan is the long-range guiding policy document for all land use and development regulations in unincorporated King County and for regional services throughout the County, including transit, sewers, parks, trails, and open space. King County uses the long-range comprehensive planning process to guide growth and protect natural resources. King County must complete the *2024 Comprehensive Plan Update* (“2024 Plan Update”) by December 31, 2024, and every 10 years thereafter (RCW 36.70A.130).

The current comprehensive plan consists of goals and policies related to regional growth management planning; urban communities; rural areas and natural resource lands; housing and human services; environment; shorelines; parks, open space, and cultural resources; transportation; services, facilities, and utilities; economic development; community service subarea planning; and plan implementation. The 2024 Plan Update is rooted in the value of making King County a welcoming community where every person can thrive. In support of this value, the 2024 Plan Update has three focus areas: equity, housing, and climate change and the environment.

**Scoping:** In August 2022, King County determined that the 2024 Plan Update had the potential to result in significant adverse impacts on the environment and therefore an environmental impact statement (EIS) was required, per RCW 43.21C.030 (2)(c). King County issued a *Determination of Significance and Request for Comments on the Scope of the Environmental Impact Statement* for public review and comment per the Washington State Environmental Policy Act (SEPA), and Washington Administrative Code (WAC) 197-11-410.

The purpose of scoping was to allow tribes, agencies, and members of the public to comment on the scope of the EIS for the 2024 Comprehensive Plan Update. The scoping comment period went from August 10 to August 31, 2022. People were invited to comment on the alternatives, mitigation measures, probable significant adverse impacts, and licenses or other required approvals.

Comments were received and King County issued a *Scoping Summary Report* in September 2022, using the comments and information received during the scoping public comment period to determine the elements of the environment and the range of alternatives to study in the EIS.

**Draft EIS:** In December 2023, King County released a *Draft Environmental Impact Statement* concurrent with transmittal of the 2024 Plan Update to the County Council. The public comment period on the Draft EIS went from December 7 to January 31, 2024. The Draft EIS analyzed the probable adverse environmental impacts of a range of reasonable alternatives, including a “no action” alternative and two “action” alternatives per WAC 197-11-402(1) and 197-11-060(3).

For nonproject proposals, such as the 2024 Plan Update, SEPA encourages agencies to describe the proposal in terms of alternative means of accomplishing a stated objective rather than a preferred solution (per WAC 197-11-442(2)). Accordingly, the alternatives evaluated in the Draft EIS were intended to illustrate alternate means of implementing the current, Multicounty Planning Policies, and the Countywide Planning Policies in order to align with, and advance, current plans, regulations, and practices. When adopted, the proposed amendments in the 2024 Plan Update may be one of the alternatives or may blend components of multiple alternatives together.

## II. Summary of Public Comment Period

**Summary of Participation:** King County received 13 comments: 1 comment from tribes, 6 comments from members of the public/private businesses, and 6 comments from community organizations/agencies.

**Summary of Comments:** Many of the comments submitted to the DEIS-designated email address were focused on policy proposals in the 2024 Plan Update, rather than on the DEIS itself. Comments submitted on the Draft EIS include the following:

- Technical corrections.
- Preferences and concerns regarding the policy proposals included in each of the action alternatives, rather than the DEIS.
- Suggested changes or additional policy proposals to include in the action alternatives and requests for the associated analysis in the FEIS.
- Encouraging the County to study additional topics.

All of the submitted comments are included in their entirety in Appendix A.

## III. Next Steps

A Final EIS will be developed based on public comments received, the County Council Committee-recommended version of the 2024 Comprehensive Plan, and any new amendment concepts to be considered by the County Council before final adoption. Amendment concepts raised after publication of the Draft EIS must be within the scope of the alternatives analyzed in the Draft EIS, otherwise a supplemental EIS may be required.

## **Appendix A: Public Comments**



**From:** [County Citizen](#)  
**To:** [Complan Sepa](#)  
**Subject:** Comment  
**Date:** Thursday, December 7, 2023 11:08:46 AM

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To whom it may concern,

SECTION 43 20.20.035 Establishes community meeting requirements for certain types of development permits, including allowing citizens to propose alternative sites for the development proposal Removes reference to "citizen"

Amendments propose removing references to the term "citizen" from the development regulations are proposed to be consistent with changes made with the 2016 Comprehensive Plan that reflect that **the County serves all members of the public, regardless of citizenship status.**

This is not true and totally irresponsible to spend our county tax money, generated by Citizens of the county, to be given to illegal invaders. The county is a mess and the county is concerned with giving away our tax dollars to invaders?

Then county has no duty nor a requirement to serve anyone who is not a Citizen of the County. You can not be a Citizen if you are an illegal invader. To pretend like we have some sort of responsibility to these invaders is ludicrous and laughable.

Oh and how about all your special POC only programs? What about the State Constitution?

SECTION 12 SPECIAL PRIVILEGES AND IMMUNITIES PROHIBITED. No law shall be passed granting to any citizen, class of citizens, or corporation other than municipal, **privileges** or immunities which upon the same terms shall not **equally belong to all citizens**, or corporations.

This is being totally ignored and infringed upon by the State and the County by allowing them privileges to monies not afforded to all citizens.

People are getting fed up with you.

-Citizen of King County (named for William Rufus de Vane King)

Sent with [Proton Mail](#) secure email.

**From:** [Diane Pottinger](#)  
**To:** [Compplan Sepa](#)  
**Subject:** Comments on the County's Plan  
**Date:** Tuesday, December 12, 2023 2:46:17 PM  
**Attachments:** [image001.png](#)

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To whom It May Concern.

In reviewing Appendix, A, Section I Capital Facilities, C Capital Facilities Inventories and Planning, 2 Facilities provided by other public entities.

The table of public water systems on page A-7 is missing our utility, North City Water District. We had previously been known as Shoreline Water District during the County's last water system plan but changed our name effective 1/1/2014. It was approved by Ordinance 19266 was approved on 4/15/2021.

We would appreciate getting it corrected in the final Comprehensive Plan.

Thank you.

Diane Pottinger, P.E.  
District Manager



1519 NE 177<sup>th</sup> Street | Shoreline, WA 98155  
p. 206.362.8100 | f. 206.361.0629

This e-mail message is a public document and may be subject to public disclosure if requested by another party.

**From:** [Peter Rimbos](#)  
**To:** [Ngo, Jenny](#); [Williams, Gabriela](#); [KCC - Legislative Clerks \(Email Group\)](#)  
**Cc:** [Perry, Sarah](#); [Dunn, Reagan](#); [Zahilay, Girmay](#); [Mosqueda, Teresa](#); [Miller, Ivan](#)  
**Subject:** Joint Team Oral Testimony for Tonight's LS&L-U Committee Meeting  
**Date:** Thursday, January 18, 2024 6:53:25 PM  
**Attachments:** [Joint Team Oral Testimony for at Tonight's Committee Meeting.pdf](#)

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KC Council Local Services & Land-Use Committee,

I was planning on providing an Oral Testimony at tonight's committee Special Meeting on the 2024 KCCP 10-Yr Major Update—specifically on the Draft EIS. Unfortunately, I took a tumble on the ice earlier today and have several bumps and bruises on my forehead and nose. I'm doing OK considering, but not in the right frame of mind to directly provide an Oral Testimony. Thank you for understanding.

Our Oral Testimony is attached on behalf of the entire Joint Rural Area Team.

We also have cc'ed Ivan Miller who managed the Draft EIS in the Executive's Office.

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

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

*Please consider our shared environment before printing.*

**January 18, 6:30 PM, Council Chambers  
LS&L-U Special Committee Meeting**

**Public Hearing on Draft EIS [Peter]**

My name is Peter Rimbos. I am the Coordinator for the Joint Team which consists of *Enumclaw Plateau Community Association, Friends of Sammamish Valley, Greater Maple Valley Unincorporated Area Council, Green River Coalition, Green Valley/Lake Holm Association, Hollywood Hill Association, Soos Creek Area Response, Upper Bear Creek Unincorporated Area Council, and Vashon-Maury Island Community Council*. We also have three Rural Technical Consultants: Ken Konigsmark—Growth Management Focal; Mike Birdsall—Transportation Focal; and Terry Lavender—Environment/Open Space Focal.

With respect to the *Draft EIS*, we support much of what is described in the **Extensive Change Alternative** considered, such as: *“Require cities to pay impact fees and implement traffic demand management strategies for large developments that impact unincorporated areas;”* however, we do have several concerns:

- (1) Greater land conversions in the Rural Area and Natural Resource Lands and urban development in the Rural Area.
- (2) *“... greater urban development within unincorporated rural areas. Tourism, resort, and economic development-oriented buildings ... allowed to a greater degree in the Rural Area, on Natural Resource Lands, and within agricultural zones...”*
- (3) *“Allow additional clearing of trees and vegetation in unincorporated King County, without a permit, for habitable structures and utilities.”*
- (4) *“Make substantive updates to the 4:1 program requirements, such as allowing for: a reduced open space ratio...noncontiguous open space...nonresidential projects...and projects not likely to be timely annexed.”*
- (5) *“Modify and expand the TDR program, such as ... allowing urban open spaces that were previously acquired using conservation futures tax funding ... to become TDR sending sites, removing specific goals for reduction of development potential outside the Urban Area, ... and allowing for payment into the TDR bank when TDRs are not available.”*
- (6) *“Make substantive updates to the existing land use designations and zoning classifications ... such as ... incentivizing agritourism....”*
- (7) *“Expand SEPA exemptions to the maximum allowed by WAC 197-11-800.”*
- (8) Several suggested *“land use designation and zoning classification changes.”*

Thank you.

**From:** [Rick Shrum](#)  
**To:** [Compplan Sepa](#)  
**Subject:** Comment on Draft Environmental Impact Statement (DEIS) for the 2024 Update  
**Date:** Friday, January 19, 2024 3:57:08 PM  
**Attachments:** [image.png](#)

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Hello. I have a comment regarding the DRAFT EIS. And actually it is a comment and a request not on what is in the plan but what is NOT in the plan.

I realize and read thru the information on non-project EIS work that is underway. I understand that not everything gets included and also that specific project based items are not included either. So, a line needs to be drawn, understood. I am here to make the case that if a new use, never before allowed, in the RA-5 zone is included in the comp plan update then that "breaking of the egg" for RA-5 should be significant enough and should trigger EIS study.

Specifically, heretofore RA-5 did allow some Retail Use; garden center, forest products but it did not allow Retail Food Stores. In this plan the Executive is proposing to allow for Retail Food Stores in RA-5. Retail Food stores potentially come with great amounts of latitude on hours (24 x7 ?), noise (dead drops and dumpsters), impacts to neighbors (parking, noise), etc. Here is the proposed change highlighted:

## A. Retail land uses.

P-Permitted Use C-Conditional Use S-Special Use		RESOURCE			RURAL	RESIDENTIAL			COMMERCIAL/INDUSTRIAL				
SIC#	SPECIFIC LAND USE	A	F	M	RA	UR	R1-8	R12-48	NB	CB	RB	O	I (((30)))
*	Building Materials and Hardware Stores		P23						P2	P	P		
*	Retail Nursery, Garden Center, and Farm Supply Stores	P1 C1			P1 C1				P31	P	P		

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*	Forest Products Sales	P3 and 4	P4		P3 and 4						P		
*	Department and Variety Stores						C14a	P14	P5	P	P		
54	Food Stores				C30		C15a	P15	P31	P	P	C	P6

Yes, there are limitations placed on this new use for sure. But why? If you are going to open up a new use why be so limiting, perhaps even so far as to make this change for Just One Property in all of KC?

In any event, the proposed code change should see the light of day and discussion and that discussion should be informed by an EIS study. From my perspective, I would guess that 50%+ of Vashon is RA-5 so this change opens the door to allowing this use in all of RA-5 over time. I believe opening this new use up is not a small change but a big one and one that if people knew about this (no seems to) they would have opinions.

thank you,

Rick Shrum  
206.856.2994

**From:** [Brian](#)  
**To:** [Compplan\\_Sepa](#)  
**Cc:** [CouncilDistrict9@subscriptions.kingcounty.gov](mailto:CouncilDistrict9@subscriptions.kingcounty.gov)  
**Subject:** 2024 Comprehensive Plan  
**Date:** Saturday, January 27, 2024 10:45:34 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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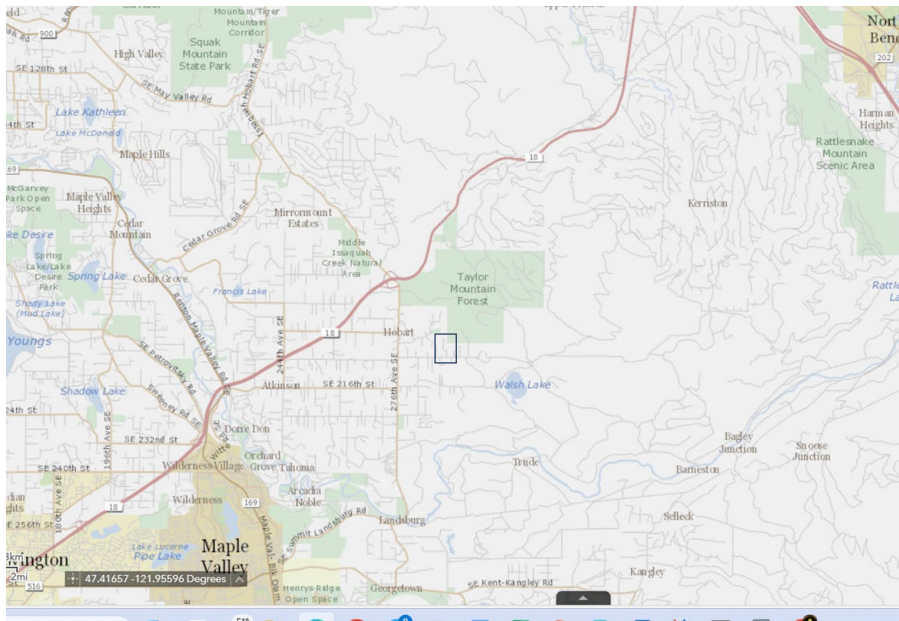
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Hello,

I am an owner of 5 acres zoned as RA-5 with private well in unincorporated King County. The majority of my neighbors have shared well & smaller parcels. Can I request that my parcel be included in this new King County Comprehensive Plan to be rezoned as R-1. This will allow for both growth & preservation of the area. My well will be split amongst the 5 properties.

Please advise. Thank you.

Brian Poggioli, parcel **0622079093**  
[pogg75@hotmail.com](mailto:pogg75@hotmail.com)






## King County Districts and Development Conditions for parcel 0622079093

Parcel number	0622079093	Drainage Basin	Issaquah Creek
Address	20525 292ND AVE SE	Watershed	Sammamish River
Jurisdiction	King County	WRIA	Cedar-Sammamish (8)
Zipcode	98038	PLSS	SE - 6 - 22 - 7
Kroll Map page	B33	Latitude	47.41862
Thomas Guide page	688	Longitude	-121.95693



### King County Electoral districts

<a href="#">Voting district</a>	HOBART	Fire district	King County Fire Protection District No. 43
<a href="#">King County Council district</a>	District 9, Reagan Dunn (206) 477-1009 	Water district	does not apply
Congressional district	8	Sewer district	does not apply
Legislative district	5	Water & Sewer district	does not apply
School district	Tahoma #409	Parks & Recreation district	does not apply
Seattle school board district	does not apply (not in Seattle)	Hospital district	does not apply
District Court electoral district	Southeast	Rural library district	King County Rural Library District
Regional fire authority district	does not apply	Tribal Lands?	No

### King County planning and [critical areas](#) designations\*

<a href="#">King County zoning</a>	RA-5	<a href="#">Urban Unincorporated Status</a>	does not apply
<a href="#">Development conditions</a>	None	<a href="#">Rural town?</a>	No
<a href="#">Comprehensive Plan Land Use Designation</a>	ra	<a href="#">Water service planning area</a>	Cedar River Water and Sewer District
<a href="#">Urban Growth Area</a>	Rural	<a href="#">Transportation Concurrency Management</a>	Pass - Lake Youngs/Hobart Travelshed
<a href="#">Community Service Area</a>	Greater Maple Valley/Cedar River Area	Forest Production district?	No
<a href="#">Community Planning Area</a>	Tahoma/Raven Heights	Agricultural Production district?	No
Coal mine hazards?	None mapped	<a href="#">Snoqualmie Valley watershed improvement district?</a>	No
Erosion hazards?	None mapped	<a href="#">Critical aquifer recharge area?</a>	None mapped
Landslide hazards?	None mapped	Wetlands at this parcel?	None mapped
Seismic hazards?	None mapped	<a href="#">Within the Tacoma Smelter Plume?</a>	Limited Data
100-year flood plain?	None mapped	<a href="#">Shoreline management designation</a> (% of parcel)	None mapped
<a href="#">Sea Level Rise Risk Area</a>	Does not apply	Wildland Urban Interface	Wildland Urban Interface

\*Most of these designations apply only to unincorporated areas

**From:** [Peter Rimbos](#)  
**To:** [Compplan Sepa](#)  
**Cc:** [Policy Staff, Council CompPlan](#); [KCC - Legislative Clerks \(Email Group\)](#); [Miller, Ivan](#); [Jensen, Chris](#); [Taylor, John - Dir](#); [Greg Wingard](#); [O'Brien \(EPCA\) Tim](#); [Lavender](#); [Tanksley \(HHA\) Michael](#); [Stafford \(UBCUAC\) Nancy](#); [Konigsmark Ken](#); [Eberle \(FCUAC\) Peter](#); [Benedetti \(GV/LHA\) Andy](#); [Buchanan \(GMVUAC\) Lark](#); [bencarr8](#); [Affolter \(V-MCC\) John](#); [Glover \(FoSV\) Serena](#); [Guddat \(SCAR\) Jeff](#); [Birdsall Mike](#)  
**Subject:** 2024 KCCP Major Ten-Yr Upd--DEIS--Joint Team Public Comment  
**Date:** Tuesday, January 30, 2024 11:13:43 AM  
**Attachments:** [KC Exec"s Recom"d Plan--DEIS Comments--1-30-24.pdf](#)

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Mr. Miller,

Please accept the attached Comments on the subject DEIS from the Joint Rural Area Team.

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

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

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**2024 KCCP Major Update  
Draft Environmental Impact Statement**

**JOINT RURAL AREA TEAM COMMENTS**

January 30, 2024

To: Ivan Miller, SEPA Official, King County Office of Performance, Strategy and Budget:  
[CompPlan.SEPA@kingcounty.gov](mailto:CompPlan.SEPA@kingcounty.gov); [CouncilCompPlan@kingcounty.gov](mailto:CouncilCompPlan@kingcounty.gov)

Re: **Public Comment— 2024 KCCP Major Update—Draft Environmental Impact Statement**

Please accept *Comments* herein on the subject **2024 King County Comprehensive Plan (KCCP) Major Update (Update)—Draft Environmental Impact Statement (DEIS)** from the Joint Team of King County Unincorporated Rural Area organizations (\*).

We have participated in the **Update** since the beginning of 2022 working with KCCP Manager, Chris Jensen. We provided detailed Comments on *Scoping*, *Conceptual Proposals*, *Environmental Impact Statement (EIS) Scoping*, and the *Public Review Draft*. We now are completing our in-depth review of the Executive's "*Recommended Plan*" (ERP).

Our Joint Team endeavors to review, consult, develop, and offer solutions on issues of interest to people who live in a wide expanse of King County's unincorporated Rural Area. Each of our organizations considers its work on the KCCP one of its most important duties and responsibilities. Indeed, our Joint Team has been through multiple successive KCCP Major Updates (including the *2020 KCCP Mid-Point Update*) with some of our member organization's work on same going back nearly 20 years to the *2004 KCCP Major Update* and others further back to the pre-Growth Management Act (GMA) days, when there were no formal KCCPs.

Please note that one of our Joint Team organizations, the *Vashon-Maury Island Community Council (V-MCC)*, due to limitations in its By-Laws, is unable to complete its DEIS review at this early stage and, hence, is *not* included in the approval "*signatures*" below.

Please contact us should any questions arise during the review of our Comments herein. Thank you.

(\*) *Joint Team*: *Enumclaw Plateau Community Association (EPCA)*, *Friends of Sammamish Valley (FoSV)*, *Greater Maple Valley Unincorporated Area Council (GMVUAC)*, *Green River Coalition (GRC)*, *Green Valley/Lake Holm Association (GV/LHA)*, *Hollywood Hill Association (HHA)*, *Soos Creek Area Response (SCAR)*, *Upper Bear Creek Unincorporated Area Council (UBCUAC)*, and *Vashon-Maury Island Community Council (V-MCC)*.

Coordinated by:

Peter Rimbo  
[primbos@comcast.net](mailto:primbos@comcast.net)  
Regional Coordinator, KCCP Updates, GMVUAC

**2024 KCCP Major Update  
Draft Environmental Impact Statement**

**JOINT RURAL AREA TEAM COMMENTS**

Coordinator, Joint Team Rural Area Team

Approved by:

LarKen Buchanan  
[Imbuch@outlook.com](mailto:Imbuch@outlook.com)  
“Acting” Chair, GMVUAC

Michael Tanksley  
[wmtanksley@comcast.net](mailto:wmtanksley@comcast.net)  
President, HHA

Nancy Stafford  
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Chair, UBCUAC

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[andyb929@gmail.com](mailto:andyb929@gmail.com)  
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Transportation Focal

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Rural Technical Consultant  
Environment/Open Space Focal

cc: King County Council, Local Services and Land-Use Committee: [kcccomitt@kingcounty.gov](mailto:kcccomitt@kingcounty.gov)  
Chris Jensen, King County Comprehensive Plan Manager: [chris.jensen@kingcounty.gov](mailto:chris.jensen@kingcounty.gov)  
John Taylor, Director, King County Department of Local Services: [john.Taylor@kingcounty.gov](mailto:john.Taylor@kingcounty.gov)

**2024 KCCP Major Update  
Draft Environmental Impact Statement**

**JOINT RURAL AREA TEAM COMMENTS**

**Draft EIS**  
[Draft Environmental Impact Statement](#)

We understand per **WAC 197-11-442(4)** an EIS for a comprehensive plan calls for a discussion of alternatives that:

*“...shall be limited to a general discussion of the impacts of alternate proposals for policies contained in such plans, for land use or shoreline designations, and for implementation measures. The lead agency is not required under SEPA to examine all conceivable policies, designations, or implementation measures but should cover a range of such topics.”*

With the above in mind, while we support much of what is described in the **Extensive Change Alternative** considered, such as “Require cities to pay impact fees and implement traffic demand management strategies for large developments that impact unincorporated areas,” we have highlighted several concerns, as detailed in the sections below.

**EXECUTIVE SUMMARY**

p. ES-4:

We have concern with the following statement in that “all unincorporated areas” includes, by definition, the Rural Area:

*“For example, the Extensive Change Alternative would seek to achieve the proposal objectives by expanding mandatory inclusionary housing to all unincorporated areas.”*

p. ES-6:

We have concerns with the following as related to greater: (1) Land conversions in the Rural Area and Natural Resource Lands and (2) Urban development in the Rural Area:

***“Extensive Change Alternative***

*The Extensive Change Alternative includes mandatory programs and requirements to implement more substantial changes related to land use, zoning classifications, and development standards compared to the Limited Change Alternative. The County would be expected to make progress in meeting its objectives to address equity, housing, and climate change and the environment under this alternative to a greater degree than under both the No Action Alternative and Limited Change Alternative. Following are **examples** of potential impacts from the Extensive Change Alternative, whether positive or negative.*

**2024 KCCP Major Update  
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**JOINT RURAL AREA TEAM COMMENTS**

*Natural Environment*

*In comparison to the Limited Change Alternative, the Extensive Change Alternative would help the County to a greater degree in meeting its greenhouse gas emissions reduction goals and protecting water resources, farmland, critical areas, and natural habitat from development. However, the Extensive Change Alternative could result in a greater conversion of Rural Area and Natural Resource Lands through policies that provide expanded allowances for the development of renewable energy, resorts, or industrial uses than the other alternatives. The Extensive Change Alternative would require, rather than incentivize, active production of farmland in agricultural zones, which could result in greater localized water quality impacts within areas zoned for agriculture as compared to the Limited Change Alternative.*

*Built Environment*

*The Extensive Change Alternative includes greater allowances for density and requirements for inclusionary housing than the Limited Change Alternative. It could increase the variety of housing options and lead to development patterns within and closer to existing urban areas and those served by public transit. This would support housing for a broader range of income levels and lead to a more efficient expansion of utility and public services than compared to the Limited Change Alternative. Substantial increases in allowances for temporary and emergency housing would support short-term housing needs, though could necessitate an increase in social service provider staff and resources.*

*The Extensive Change Alternative would conserve more land as rural through the TDR Program and make more substantive updates to the Four-to-One Program requirements, including changes that are more likely to increase participation. As with the Limited Change Alternative however, the Extensive Change Alternative could alter the geographic pattern of land designated for conservation, including greater urban development within unincorporated rural areas. Tourism, resort, and economic development-oriented buildings would be allowed to a greater degree in the Rural Area, on Natural Resource Lands, and within agricultural zones, which could result in development inconsistent with the existing character of those areas.”*

## **2. PROPOSED ACTION AND ALTERNATIVES**

Our comments on the **Table 2.3–1. Alternatives Examples Table** (pp. 2-5 thru 2-21) below only deal with the “Extensive Change Alternative” column.

**Equity** (pp. 2-5 thru 2-8):

(p. 2-5):

**2024 KCCP Major Update  
Draft Environmental Impact Statement**

**JOINT RURAL AREA TEAM COMMENTS**

***“Reduce housing and business displacement and advance equity for those who are Black, Indigenous, People of Color, immigrants, and/or refugees, especially those who also earn less than 80% of the AMI.”***

(p. 2-5): ***“Expand inclusionary housing or require mandatory inclusionary housing in all unincorporated areas, including Rural Towns.”***

***Climate Change and the Environment*** (pp. 2-11 thru 2-14):

(p. 2-11 to 2-12):

***“Align with and advance the King County 2020 Strategic Climate Action Plan to reduce GHG emissions, support sustainable and resilient communities, and prepare for climate change.”***

(p. 2-12): ***“Allow additional clearing of trees and vegetation in unincorporated King County, without a permit, for habitable structures and utilities.”***

(p. 2-13 to 2-14):

***“Increase the amount of land that is preserved for conservation.”***

(p. 2-13): ***“Make substantive updates to the Four-to-One program requirements, such as:***

- Using joint planning area boundaries.***
- Allowing for reduced open space ratio.***
- Allowing for noncontiguous open space.***
- Allowing urban-serving facilities in the Rural Area.***
- Allowing nonresidential projects.***
- Allowing projects not likely to be timely annexed.”***

(p. 2-14): ***“Modify and expand the TDR program, such as providing bonus TDRs for sending sites that are in the Forest zone or are vacant marine shoreline without bulkheads, allowing TDR sending sites on Vashon–Maury Island, allowing urban open spaces that were previously acquired using conservation futures tax funding or urban separators to become TDR sending sites, removing specific goals for reduction of development potential outside the Urban Area, allowing TDRs to be used for duplex units in the Urban Area and Rural Towns, and allowing for payment into the TDR bank when TDRs are not available.”***

***General*** (pp. 2-14 thru 2-21):

(p. 2-15 to 2-16):

***“Address the outcomes of the County Subarea Planning Program.”***



**2024 KCCP Major Update  
Draft Environmental Impact Statement**

**JOINT RURAL AREA TEAM COMMENTS**

(p. 2-16): *"Make substantive updates to the existing land use designations and zoning classifications in the Snoqualmie Valley/NE King County subarea, such as updating the allowed uses in the Fall City Business District Special District Overlay and removing some conditions to create parity with adjacent properties. For example:*

*...*

- *Incentivize agritourism, including options for compatible uses (education, experiences, value-add, processing, sales).*

(p. 2-17 to 2-18):

***"Update transportation policies."***

We suggest that all ten items listed under the ***"Extensive Change Alternative"*** column be moved to and replace the comparable ten items under the ***"Limited Change Alternative"*** column, as these all constitute activities we would like to see implemented.

(p. 2-18):

***"Improve regulations governing rural and natural resources."***

(p. 2-18): *"Expand SEPA exemptions to the maximum allowed by WAC 197-11-800."*

(p. 2-18 to 2-21):

***"Implement land use designation and zoning classification changes."***

(p. 2-18): *"Allow resorts in additional areas with limited development conditions, beyond the existing permitted use."*

(p. 2-18): *"Allow for additional material processing uses in additional zones, with limited development conditions."*

(p. 2-19): *"Make more extensive changes to manufacturing and regional land uses allowed in the Industrial zone and remove the prohibition outside the UGA or revise the uses that require a conditional or special use permit."*

(p. 2-19): *"Make more extensive changes to development standards in anticipation of new and innovative industrial uses."*

- *"Encourage rural economic development, rural economic strategies, and tourism in the rural area and on Natural Resource Lands."*
- *"Encourage agrotourism in the Rural Area, especially where there is the opportunity for compatible uses, such as educational experiences, value-added processing, and sales."*
- *"Modify the uses permitted in the Rural Area to implement rural economic development goals."*

(p. 2-19): *"Allow mineral extraction operations with fewer development conditions."*



**2024 KCCP Major Update  
Draft Environmental Impact Statement**

**JOINT RURAL AREA TEAM COMMENTS**

(p. 2-20): "...Consider how mixed-use developments, at an appropriate size and scale, could support rural economic and agritourism opportunities, the number of mixed use developments needed, and what uses would be allowed." **[This is in the "Limited Change Alternative" column.]**

(p. 2-20): "Allow food stores in the Rural Area zone with minimal development conditions."

(p. 2-20): "Make more extensive land use designations and zoning classification changes based on area- wide evaluation of the UGA and permitted densities, such as moving the UGA boundary and/or increasing the density and intensity of use."

(p. 2-21): "Allow for additional industrial zoning classification in the Rural Area and on Natural Resource Lands."

**From:** [Courtney Flora](#)  
**To:** [Compplan](#);  
**Cc:** [Clerk, King County Council](#); [Perry, Sarah](#); [Colin Cashel](#); [Vaughn Brock](#); [Jessica Clawson](#)  
**Subject:** 2024 Comp Plan Update DEIS Comment, Request to Adopt MFTE in White Center  
**Date:** Tuesday, January 30, 2024 3:01:22 PM  
**Attachments:** [King County 2024 Comp Plan DEIS, MFTE in White Center.pdf](#)

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Hello— Please see the attached comment letter on the draft EIS for the 2024 Comprehensive Plan Update.

On behalf of Five Point Capital Partners, developer of a new mixed-use housing project in White Center, we are requesting that the County study and implement the Multi Family Tax Exemption (MFTE) in the White Center neighborhood.

The state legislature expanded MFTE to include White Center in 2021, but the County has not acted to implement MFTE— despite the fact that it would incentivize investment necessary to combat the affordable housing crisis.

Thank you for your attention to this comment and please reach out with any questions.

Courtney Flora  
Partner  
**McCULLOUGH HILL PLLC**  
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Seattle, Washington 98104  
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# McCULLOUGH HILL PLLC

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January 30, 2024

VIA ELECTRONIC MAIL

King County Office of Performance, Strategy and Budget  
Attn: Ivan Miller  
401 Fifth Avenue, Suite 810  
Seattle, WA 98104  
[CompPlan.SEPA@kingcounty.gov](mailto:CompPlan.SEPA@kingcounty.gov)

Re: 2024 Comprehensive Plan Draft Environmental Impact Statement (“DEIS”) Comment  
Request to Study/Implement Multi-Family Tax Exemption (“MFTE”) in North Highline

Dear Ivan:

We appreciate the opportunity to comment on the Draft Environmental Impact Statement (“DEIS”) for King County’s 2024 Comprehensive Plan Update. We represent FivePoint Capital Management, developer of a mixed-use, 137-unit residential project located near 16<sup>th</sup> Avenue SW and SW 107<sup>th</sup> Street in the White Center neighborhood of unincorporated King County.

We request that the DEIS study implementation of the Multi-Family-Tax Exemption (“MFTE”) in the North Highline/White Center neighborhood. MFTE could occur with any of the three alternatives identified in the DEIS (including No Action). MFTE implementation does not require a Comprehensive Plan amendment, but given the County’s focus on incentivizing affordable housing production in the 2024 Update, it is appropriate to study and pursue MFTE as part of this process. It is a critical tool to increase the County’s affordable housing stock.

FivePoint elected to develop a project in White Center because it is a designated Qualified Opportunity Zone. This mixed-use project replaces an existing funeral home and car storage use with a vibrant mix of commerce, retail, employment opportunities and affordable housing— it is exactly the type of project the County’s land use policies envision for this neighborhood.

When FivePoint initiated this project, MFTE was not available in White Center due to restrictions in state statute. The lack of MFTE created concerns about the project’s economic viability, which remain today. In 2021, with FivePoint’s support, the state legislature adopted E2SSB 5297, which expanded the MFTE program to a greater number of cities and counties throughout Washington—to include the North Highline/White Center neighborhood. As of 2022, 55 communities in Washington have active MFTE programs. The exemptions issued in 2021 resulted in 7,759 new housing units, including 1,058 rent-restricted units for low-income households.

Inexplicably, King County has not taken action to implement MFTE anywhere— despite repeated requests from FivePoint over the past two years. King County’s failure to implement MFTE is even more inexplicable in light of the specific “Proposal Objectives” identified in the DEIS. Fourteen objectives are outlined, and the first six relate directly to affordable housing production:

- Reducing housing and business displacement and advancing equity for those who are Black, Indigenous, People of Color, immigrants, and/or refugees, especially those who also earn less than 80 percent of the Area Median Income (AMI)
- Integrating a pro-equity and anti-racist policy framework that improves outcomes for those who are Black, Indigenous, People of Color, immigrants, and/or refugees, especially those who earn less than 80 percent of the AMI
- Improving health equity outcomes in communities with the greatest and most acute needs
- Aligning housing policies and regulations with the CPPs and Washington State Engrossed Second Substitute House Bill 1220 (Chapter 254 Laws of 2021)
- Improving affordable housing supply, especially for those who are Black, Indigenous, People of Color, immigrants and/or refugees, especially those that earn less than 80 percent of the AMI
- Expanding housing options at all levels of affordability.

*2024 King County Comprehensive Plan Update, DEIS, Executive Summary, pp. ES-1 – ES-2, December 2023.*  
All of the objectives outlined above can be directly advanced through implementation of MFTE.

In September 2021, the County published the Skyway-West Hill and North Highline Anti-displacement Strategies Report (“Strategies Report”), which documents the affordable housing crisis in these communities. In 2018, White Center’s median income was \$51,898, which is significantly lower than the County median household income of \$89,418. *Strategies Report*, p. 18. The Report noted that “the combination of rising housing prices, the high rate of cost burdened households, and lower than average incomes put Skyway-West Hill and North Highline residents at increased risk of displacement.” Not surprisingly, the Report concluded that “the availability of affordable housing units reduces displacement.” *Id.*, pg. 31. Ultimately, the Report recommended that the County “develop more publicly subsidized affordable housing, especially for households below 60 percent of AMI.” *Id.*, p. 12.

Unfortunately, the Strategies Report was prepared in large part before the state legislature acted to expand MFTE. Community input was solicited from October 2020 through April 2021, and the Report was released in September— just months after MFTE was authorized for implementation in North Highline. Given this timing, the Report refers to MFTE as a “possible” future option, but it was given short-shrift:

King County retained Berk Consulting, Inc., to prepare a supplemental update to the Enterprise Community Partners and BERK Consulting, Inc., Affordable Housing Incentives Analysis: North Highline Skyway-West Hill analysis, to consider current housing market

conditions and the potential impact that the proposed inclusionary housing program and a possible Multifamily Tax Exemption (MFTE) program would have on development in the Skyway-West Hill and North Highline areas. This report update concluded that the proposed incentives for the inclusionary housing program balance the cost of providing the affordable housing at this time. Contributing factors to making this program work include reducing parking requirements, increasing allowed density, and increased market rent levels. **After passage of E2SSB 5287 during the 2021 Washington State legislative session, King County could implement an MFTE program in unincorporated King County. MFTE would further increase the economic viability of development projects with inclusionary housing units.**

*Strategies Report*, p. 36 (emphasis added). Subsequently, the North Highline Community Service Area Subarea Plan adopted in December 2022 emphasized the “inclusionary zoning” strategies discussed in the Strategies Report, largely ignoring the fact that the County now has the power to use MFTE.

The County is evaluating three options in the DEIS: “No Action,” “Limited Change,” and “Extensive Change.” With respect to housing displacement and affordability, the DEIS outlines a range of study options in Table 2.3-1:

Draft Environmental Impact Statement

Table 2.3-1. Alternatives Examples Table

Proposal Objectives	No Action Alternative	Limited Change Alternative	Extensive Change Alternative
<b>Equity</b>			
Reduce housing and business displacement and advance equity for those who are Black, Indigenous, People of Color, immigrants, and/or refugees, especially those who also earn less than 80% of the AMI.	No changes to existing goals and policies, land use designations, zoning classifications, or development regulations aimed at improving equity. Full implementation of existing adopted policies, land use designations, zoning classifications, and development regulations.	Support public financing techniques to promote stability, prevent displacement, and promote equitable development.	Require public financing techniques that will provide an advantage for projects that promote housing stability, prevent displacement, and promote equitable development.
		Increase bonuses and development capacity for inclusionary housing where already allowed.	Expand inclusionary housing or require mandatory inclusionary housing in all unincorporated areas, including Rural Towns.
		Stabilize economic displacement of businesses by supporting small businesses and home occupations to promote community stability and create opportunities.	Prevent economic displacement of existing businesses and promote new small businesses and home occupations to promote community stability and create opportunities.
		Make minor updates to implement the 2021 Anti-Displacement Report <sup>36</sup> in Skyway and North Highline, such as the following: <ul style="list-style-type: none"> <li>• Community preference/right to return.</li> <li>• Priority hire.</li> <li>• Tenant relocation assistance.</li> <li>• Community land trust.</li> <li>• Manufactured housing preservation.</li> <li>• Increased home ownership opportunities.</li> </ul>	Adopt all strategies in the 2021 Anti-Displacement Report for all unincorporated areas.
		Study the impact of a creative economy.	Adopt strategies and incentives that encourage a creative economy.

We are asking the County to evaluate MFTE implementation in the North Highline community as part of the DEIS/2024 Update, so that it can be designated as a “Residential Target Area” under the criteria in Chapter 84.14 RCW.

To be clear, MFTE can be implemented via ordinance, and it does not require action in the Comprehensive Plan. But it makes no sense for the County to engage in a Comprehensive Plan Update focused on affordable housing without evaluating the use of MFTE. The County is clearly committed to incentivizing affordable housing production— it should not continue to overlook MFTE as a key tool in achieving its housing goals.

We appreciate the opportunity to comment. Please do not hesitate to contact me should you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Courtney E. Flora', with a long horizontal flourish extending to the right.

Courtney E. Flora

cc: King County Councilmembers  
Lauren Smith, Deputy Director, Office of Performance, Strategy and Budget

**From:** [Todd Gray](#)  
**To:** [Compplan Sepa](#)  
**Subject:** Tulalip Tribes Comments on Draft Environmental Impact Statement for the 2024 King County Comprehensive Plan Update  
**Date:** Wednesday, January 31, 2024 9:23:12 AM  
**Attachments:** [KCCompPlan\\_DraftEIS\\_Comments\\_TTT\\_20240131.pdf](#)

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Please see the attached comments from The Tulalip Tribes.

Thank you,

**Todd Gray**

Environmental Protection Ecologist  
The Tulalip Tribes | Natural Resources Dept.  
360-716-4620 | [toddgray@tulaliptribes-nsn.gov](mailto:toddgray@tulaliptribes-nsn.gov)



Natural Resources Department  
Environmental Division  
6406 Marine DR NW  
Tulalip, WA 98271

.....

January 31, 2024

King County Office of Performance, Strategy and Budget  
Attn: Ivan Miller  
401 Fifth Ave, Suite 810  
Seattle, WA 98104

**Re: 2024 King County Comprehensive Plan Update Draft Environmental Impact Statement**

The Tulalip Tribes are federally recognized and are signatories to the Treaty of Point Elliott of 1855. The Tulalip Tribes retain constitutionally protected, treaty-reserved rights to harvest, consume, and otherwise manage fish, shellfish, and other treaty reserved resources within our usual and accustomed areas. These treaty rights and resources are integral to supporting our tribal economy, and furthermore play a vital role in ensuring the health, welfare, and cultural ways of life of our tribal nation and our members.

King County has long been recognized as a leader in environmental awareness and protection. The Tulalip Tribes appreciates and relies on King County's cooperation and shared commitment to conservation to uphold our treaty rights and maintain a healthy and productive natural environment. In support of these shared goals, the proposed objectives of the 2024 update include:

- Aligning with and advancing the King County 2020 Strategic Climate Action Plan<sup>1</sup> to reduce greenhouse gas emissions, support sustainable and resilient communities, and prepare for climate change.
- Integrating and implementing the County's Clean Water, Healthy Habitat goals.
- Increasing the amount of land that is preserved for conservation.
- Improving regulations governing rural and natural resources.

The 2024 King County Comprehensive Plan Update Draft Environmental Impact Statement (EIS) examines three alternate approaches to reaching these objectives: No Action Alternative, Limited Change Alternative, and Extensive Change Alternative. In all three of these alternatives, we see opportunities to advance our shared goals, and also some ideas proposed that may not be in alignment with these goals. It is from this perspective that we offer the following comments on language found in the Alternatives Examples Tables within the Draft EIS:

The Tulalip Tribes are federally recognized successors in the interest to the Snohomish, Snoqualmie, Skykomish, and other allied tribes and bands signatory to the Treaty of Point Elliott.





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### **Updating Critical Areas and Shoreline Regulations:**

- *Update critical areas regulations with best available science and make minor updates, such as clarifying changes, using updated terminology, and reflecting changes in state law.*

With both change alternatives, we see an opportunity to close certain loopholes, and improve upon certain aspects of current King County Critical Areas protections. For example, developers often take advantage of administrative buffer reductions, buffer averaging allowances, Innovative Development Design allowances, and other techniques that result in inadequate critical areas protections. Likewise, Critical areas themselves are too often allowed to be compromised (filling wetlands, moving streams, etc.) for the convenience of development, without demonstrating a true need. Language in the current code that is often taken advantage of should be carefully considered for changes.

### **Encouraging Development in Rural Areas:**

Several of the specific proposals outlined in the tables point to more development in rural areas. This change would result in more impervious surfaces, less native plant biomass, and increased pressure on the environment:

- *Broaden or change existing allowances for more permanent and temporary farmworker housing.*
- *Allow for additional types of housing and densities in low-density residential zones, with minimal development conditions.*
- *Modify regulations or allow resorts in additional areas with limited development conditions, beyond the existing permitted use.*
- *Allow for, or make minor changes to additional material processing uses in additional zones, with limited development conditions.*
- *Remove the prohibition outside the UGA or revise the uses that require a conditional or special use permit for manufacturing and regional land use.*
- *allow or encourage additional rural economic development, rural economic strategies, and tourism in the Rural Area and on Natural Resource Lands*



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- *Allow food stores in the Rural Area zone with minimal development conditions.*
- *Allowing for reduced open space ratio, noncontiguous open space, urban-serving facilities in the Rural Area, and nonresidential projects.*
- *Make more extensive land use designations and zoning classification changes based on areawide evaluation of the UGA and permitted densities, such as moving the UGA boundary and/or increasing the density and intensity of use.*
- *Allow for additional industrial zoning classification in the Rural Area and on Natural Resource Lands.*

The Tribes do not support expansion of UGA's, relaxing development conditions in rural areas, or otherwise increasing development opportunities in these areas. Language in the above proposals needs more clarification and further examination of potential impacts to the environment.

### **Relaxing permit requirements:**

Some proposals in the draft EIS indicate a lessening of oversight on certain activities that have the potential to negatively impact the environment:

- *Allow additional clearing of trees and vegetation in unincorporated King County, without a permit, for habitable structures and utilities.*
- *Allow management of beaver dams without a clearing and grading permit.*
- *Allow mineral extraction operations with fewer development conditions.*

Though the idea of relaxing regulations on some of these actions seems attractive, we believe some level of oversight should still be required. Notching or removal of beaver dams can cause serious environmental consequences, such as draining wetlands. Any such proposed activity should be reviewed by a qualified biologist or ecologist. Clearing of trees, if not carefully regulated, could result in rampant clearing within critical areas or their buffers, with little recourse.



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### **Increased Agricultural Allowances:**

- *Adopt different standards to promote and protect both small hobby farms and larger commercial farms.*
- *Make changes to the agriculture code by updating definitions and correcting inconsistencies.*
- *Encourage, incentivize or require active production of farmland in the Agriculture zones.*

Agriculture, though an important aspect of the rural landscape and economy, can pose significant threats to the environment through ground and surface water extractions, increased nutrients and contaminants entering surface waters, and inadequate critical areas protections. Language in the above proposals needs more clarification and further examination of potential impacts to the environment.

### **Conclusion:**

The Tulalip Tribes appreciates the opportunity to comment on the 2024 King County Comprehensive Plan Update Draft Environmental Impact Statement. Our natural resources are of paramount importance to us, and we strive to maintain, restore, and protect ecological processes in our watersheds wherever possible. We believe that with all land disturbing and development activities that may be allowed adjacent to critical areas, special care must be taken to maintain or restore the natural environment, to allow these processes to continue. The Tulalip Tribes encourages King County to consider environmental implications in protecting the water system for all our relations within the ecosystem.

Thank you for considering our concerns, and we look forward to continuing our shared commitment to conservation together.

Todd Gray  
Environmental Protection Ecologist  
The Tulalip Tribes | Natural Resources Dept.  
360-716-4620 | toddgray@tulaliptribes-nsn.gov

**From:** [Robinson, Patrick](#)  
**To:** [Compplan Sepa](#)  
**Cc:** [Ted.vanegas@commerce.wa.gov](mailto:Ted.vanegas@commerce.wa.gov); [thomas.buroker@ecy.wa.gov](mailto:thomas.buroker@ecy.wa.gov); [Liz Underwood-Bultmann](#)  
**Subject:** PSE comment son King County's 2024 Comp Plan DEIS  
**Date:** Wednesday, January 31, 2024 4:06:54 PM  
**Attachments:** [King County 2024 Comp Plan DEIS comment letter PSE 1.31.2024.pdf](#)

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Hello Mr. Miller,

Please find the attached pdf with PSE's comments on King County's Draft Environmental Impact Statement for the 2024 Comprehensive Plan update.

Best Regards,

**Patrick Robinson**  
Municipal Liaison Manager  
PUGET SOUND ENERGY  
425-424-7498



Puget Sound Energy  
P.O. Box 97034  
Bellevue, WA 98009-9734  
[PSE.com](http://PSE.com)

January 31, 2024

King County Office of Performance, Strategy and Budget  
Attn: Ivan Miller  
401 Fifth Ave, Suite 810  
Seattle, WA 98104  
[CompPlan.SEPA@kingcounty.gov](mailto:CompPlan.SEPA@kingcounty.gov)

Re: King County 2024 Comprehensive Plan – Draft Environmental Impact Statement

To Ivan Miller,

Thank you for the opportunity to comment on King County's Draft Environmental Impact Statement (DEIS), issued December 7, 2023, for the 2024 Comprehensive Plan update. Puget Sound Energy (PSE) appreciates the County's continued collaboration on topics pertaining to energy resource planning and policy. We would like to highlight two areas of the DEIS where potential impacts could be clarified, one on the topic of electrification and the phase out of fossil fuels and a second in the reliability and resilience of electrical service.

#### Electrification

The electrification of the building and transportation sectors will increase electric load in the County. Section 3.3.3.2 of the DEIS pertains to the topic of electric vehicle (EV) adoption and states that, "The construction of charging station infrastructure *may* [emphasis added] require more land development...". Similarly, under Section 4.1.3.2. Utilities, the DEIS states that the action alternatives include proposed policies "that support the use of renewable energy (e.g., solar, wind, or hydropower) and electrification of the transportation and energy sectors, which *may* [emphasis added] result in an increased demand for electricity." It is important to recognize that, as the County is reviewing impacts to the environment, the increase in electric demand due to electrification policies *will* increase demand and result in land development. Energy efficiency and conservation, including demand response technologies, will be important tools in managing electric energy consumption. However, these tools will not remove the need for additional electrical facilities in the County.

Additional electrical facilities will include local generation and energy storage. It will also include new and upsized transmission and distribution lines, transformers, and substations. It is important to be clear that there is no uncertainty on the need for this equipment to serve new electrical load. This increase in demand and the subsequent development from new electrical infrastructure will need to be balanced and consistent with many of the other policies contemplated in the proposed Comprehensive Plan. Misalignment of policies will not remove the need for continued growth of the electric distribution and transmission systems, however it will impact the reliability, the resiliency, the safety, the cost of those systems, and the effectiveness of King Counties electrification and decarbonization policies. A few examples of proposed Comprehensive Plan policies are provided below to illustrate our point.

T-327 states: King County supports expansion of private electric vehicle use and the necessary charging infrastructure, including opportunities to improve equitable access to the benefits of electric vehicle and geographically dispersed access to public vehicle charging.

If the County's strategy for EV charging calls for an increase in the geographic distribution of access to serve rural communities, then the capacity of electric lines that provide these services will need to follow concurrently.

E-211 states: King County shall develop and implement building and energy codes that reduce energy use and phase out fossil fuel use in the built environment within King County's jurisdiction.

For most utilities, there exists decades of infrastructure built up to provide service. These facilities were constructed in parallel with the local population and the development pattern established by local governments. For the electrification of transportation and buildings, and specifically to transition away from fossil fuels, we are fundamentally changing the types of service provided. This means that while King County's growth projections may not be numerically as significant as many other jurisdictions are seeing, there is still a lot of work necessary to change the existing infrastructure from a system based on fossil fuels to one that is solely based on electricity. In contrast to the standard model of utility growth being driven by population growth, the phase out of fossil fuels creates a demand for utility service within existing communities. Guided by electrification policies and codes, a neighborhood with little to no growth in population will still see significant growth in electric demand. In this situation development is not driven by the chosen growth strategy but by the chosen policy framework.

Section 4.1.3.2 of the DEIS states that while proposals that support the use of renewable energy and electrification of the transportation and energy sectors may result in an increased demand for electricity, any increase in electrical demand because of the action alternatives would represent a small fraction relative to the area served by Puget Sound Energy. This seems to draw the conclusion that there are therefore no impacts. The fact that we serve many of King County's neighbors does not change the fact that increased load in unincorporated King County calls for a corresponding increase in the development of electrical facilities in unincorporated King County. Further, in proposed policy E-213, King County would seek to work with other local jurisdictions to transition them from fossil fuels. This policy would drive increases in electric load throughout King County, not just in unincorporated areas, requiring the development and redevelopment of regional electric facilities like transmission lines and transmission switching stations. These are facilities that are currently sited in unincorporated King County that would need to be redeveloped.

One last comment on the development necessary to support electrification and a transition away from fossil fuels. An electric grid that supports the use of renewable energy like solar and wind also requires the installation of battery energy storage systems. King County's Strategic Climate Action Plan targets 100 MW of energy storage per utility serving King County by 2030 and an additional 100 MW by 2045. This is another example of required development necessary to serve increasing electric demand due to electrification and the phase out of fossil fuels.

PSE is committed to providing the necessary electrical service to meet growing demand in a safe, affordable and reliable manner. We also are committed to the transition to a decarbonized and carbon neutral energy future. We raise these comments here not in opposition to any potential policies. We share this information to make sure that there is a solid understanding of the impacts that these policies will bring. It is important to approach the energy transition with a full understanding of what will be needed to achieve these goals and policies. We ask that you do not underestimate the impacts of proposed policies and action alternatives, nor the need for new electrical facilities throughout unincorporated King County,

and we look forward to continued collaboration with the County to address policy and development challenges that come with the electrification and decarbonization.

#### Vegetation Management – Safety, Reliability and Resiliency

Local development has been referenced a few times above, and it is important to note that local development regulations will determine the speed and efficiency in which the above mentioned transition from fossil fuels will occur. Of particular importance to PSE is the continued safety, reliability and resiliency of its services. Policies that seek to block, limit or increase the cost of electric facilities (blanket tree retention or regulations that block local renewable generation and energy storage) will not mitigate the need for those facilities. We believe such policies will work against King County’s stated goals and policies regarding the resiliency and reliability of electric service. The Snoqualmie Valley/Northeast King County Community Service Area Subarea Plan specifically calls for supporting “utilities’ efforts to maintain a reliable electrical grid,” in policy SVNE-26.

PSE supports a strong focus on ‘Right Tree, Right Place’ policies to address tree protections. The DEIS provides example language regarding tree retention in Table 2.3-1 that states, “Adopt stringent tree retention standards ... with enforcement mechanisms to prohibit most healthy tree removals.” Trees in the right-of-way should not be prioritized over resilient, reliable energy transmission and distribution facilities. This is true in utility corridors as well. We believe that policies that seek to prohibit the removal of healthy trees will have a direct impact on the resiliency, reliability, safety, and the cost of electric service. Tree removal is necessary in two scenarios: the first for existing lines where there is no need to move electric facilities and trees are encroaching into and around the lines; and the second for the installation of lines in a new location, whether those are new facilities or existing lines that are required to move to meet current County development standards. Overly strict tree protection policies near rights-of-way and utility corridors will have a direct impact on electric service reliability, resiliency, safety, and cost.

Thank you again for your time and attention. If you have questions or need further clarification on the information provided here please do not hesitate to contact me at (425) 424-7498 or at [patrick.robinson@pse.com](mailto:patrick.robinson@pse.com).

Sincerely,



Patrick Robinson  
Municipal Liaison Manager

Cc: Ted Vanegas, WA Commerce  
Tom Buroker, WA Ecology  
Liz Underwood-Bultmann, PSRC

**From:** [Mark Swartz](#)  
**To:** [Compplan Sepa](#)  
**Subject:** Druids Glen- Comment on the King County 2024 Comprehensive Plan Update Draft Environmental Impact Statement  
**Date:** Wednesday, January 31, 2024 5:17:40 PM  
**Attachments:** [Druids Glen- Comment on the King County 2024 Comprehensive Plan Update Draft Environmental Impact Statement.pdf](#)  
[Attachment A.pdf](#)

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On behalf of Parks Legacy Project Druids Glen, LLC, please find our attached comment on the King County 2024 Comprehensive Plan Update Draft Environmental Impact Statement. Thanks.

Thank you and regards,

**Mark**

**Mark Swartz | Parks Legacy**  
**Director of Design and Entitlements**

14602 N. Tatum Blvd. | Phoenix, AZ 85032  
602-722-2441 Mobile



**PARKS  
LEGACY**

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January 31, 2024

King County Office of Performance, Strategy, and Budget  
Attn : Ivan Miller  
401 Fifth Ave, Suite 810  
Seattle, WA 98104  
Email : [CompPlan.SEPA@kingcounty.gov](mailto:CompPlan.SEPA@kingcounty.gov)

VIA EMAIL

Re : King County 2024 Comprehensive Plan Update  
Draft Environmental Impact Statement

Dear Mr. Miller:

On behalf of Parks Legacy Project Druids Glen, LLC ("Parks Legacy"), I am writing to comment on the King County 2024 Comprehensive Plan Update ("Major Comp Plan Update") Draft Environmental Impact Statement ("DEIS"). Parks Legacy is the owner of Druids Glen, the championship 18-hole golf course in Southeast King County ("Druids Glen").

We have been working with the County Executive and County staff to encourage the adoption of master planned resort (MPR) policies, as authorized by the Growth Management Act. *Attachment A*. As we previously described, MPR policies allow for the long-term preservation of Druids Glen's golf course and increased recreational and tourism opportunities in Southeast King County through the development of destination hotels and outdoor recreational resort facilities. Saving Druids Glen through a master planned resort development will provide open space, recreational, economic development, tax, and housing benefits that will flow to King County.

Without the adoption of MPR policies, Druids Glen is likely to be redeveloped with approximately 60-75 estate properties because the current uses are not economically viable. Such a development results in the loss of the golf course, 150+ acres of open space, and South County tourism and jobs. Parks Legacy believes this is not an outcome consistent with the County's goals.

Currently, the County proposes an outright prohibition of new MPRs in King County. *See* Executive's Proposal, Chapter 3 – Rural Areas and Natural Resource Lands Policy 329-a. We were surprised to see the Executive's proposal, which effectively deprives the County of use of a successful Growth Management Act tool for open space conservation and recreational tourism.

Clallam, Clark, Chelan, Douglas, Jefferson, Kittitas, Kitsap, San Juan, and Skagit County, among other counties, have adopted MPR policies and development regulations consistent with the Growth Management Act. Master planned resorts like Suncadia are regional tourism destinations and models of successful recreational and conservation strategies for rural economic development. We are unaware of a county that has voluntarily prohibited itself from using the MPR mechanism.



Accordingly, we were surprised that the DEIS did not specifically mention – much less evaluate the potential adverse environmental impacts and mitigation measures – the Executive’s proposal to prohibit the ability to use MPR as a planning tool in all unincorporated King County.

Specifically, we note that the DEIS failed to evaluate proposed Policy 329-a with regards to:

1. **Proposal.** State Environmental Policy Act (“SEPA”) regulations require the County to “[d]evote sufficiently detailed analysis to each reasonable alternative to permit a comparative evaluation...” WAC 197-11-440(5)(c)(v). But the DEIS fails to mention – much less evaluate the potential adverse environmental impacts of – proposed Policy 329-a’s prohibition on the potential for MPRs in the County. There is a brief mention that “[t]ourism, resort, and economic-development buildings would be allowed to a greater degree in the Rural Areas...” See DEIS, ES-6. We presume this is related to the Executive’s modifications of the “destination resort” standards. However, that is insufficient to describe the sweeping effect of an outright ban on MPR for the vast areas of the County that do not qualify as a “destination resort.” The County must update its EIS analysis to accurately disclose and study the broader impacts of Policy 329-a.
2. **Objectives.** The County describes the objectives of the Major Comp Plan Update, among other goals, as: (1) implementing the Countywide Planning Policies (“CPPs”); and (2) improving regulations governing rural and natural resources. As a non-project proposal, the County is encouraged to describe the proposal in the EIS in terms of alternative means to accomplish its stated objectives. WAC 197-11-44(2).

The King County CPPs include, among other relevant policies, the following:

**EN-21** Preserve and restore native vegetation and tree canopy, especially where it protects habitat and contributes to overall ecological function.

**EN-22** Provide parks, trails, and open spaces within walking distance of urban residents. Prioritize historically underserved communities for open space improvements and investments.

**EC-20** Promote the natural environment as a key economic asset and work to improve access to it as an economic driver. Work cooperatively with local businesses to protect and restore the natural environment in a manner that is equitable, efficient, predictable, and complements economic prosperity.

**EC-21** Encourage private, public, and non-profit sectors to incorporate environmental stewardship and social responsibility into their practices. Encourage development of established and emerging industries, technologies and services that promote sustainability, especially those addressing climate change and resilience.

The DEIS fails to evaluate how the Executive’s proposed Policy 329-a may “accomplish” its stated objectives of implementing the CPPs and “improving” rural lands regulations. In fact, Parks



Legacy believes the Executive's proposed Policy 329-a is directly in conflict with the adopted CPPs which emphasize preservation of vibrant native areas and parks and open space. The Druids Glen Property includes over 150+ acres of open space that may be made permanently accessible to the public with the creation of an MPR. An MPR at Druids Glen could become a regional model for sustainable recreational tourism and long-term conservation and environmental stewardship in Southeast King County. In contrast, the Executive's proposed Policy 329-a would establish a directive for the redevelopment of all 370+ acres into multi-million-dollar private estate properties. The result of the Executive's proposed Policy 329-a is to discourage the environmental stewardship of potential master planned resort opportunities with their corresponding open spaces, trails, and recreational benefits and, instead, expedite the conversion of existing, but economically challenged properties like Druids Glen to private, large estate residences. The County should include additional analysis of alternative ways to meet these CPPs, including use of the MPR as authorized by the Growth Management Act to support rural environmental tourism.

3. **Analysis.** For all the above reasons, the County's EIS must be updated to accurately disclose the scope of proposed Policy 329-a to allow informed analysis, including but not limited to analysis of the policy's potential impacts on Land Use, Housing, Parks, Open Space and Recreational, and Transportation elements, and where necessary, identify potential mitigation measures.

We encourage the Council to direct staff to remove the Executive's proposed Policy 329-a and include an alternative in further environmental analysis that allows for an MPR at Druids Glen.

Thank you for the opportunity to comment. Please feel free to contact me with any questions.

Sincerely,

s/Mark Swartz  
Parks Legacy Project Druids Glen, LLC

# Attachment A

February 14, 2023

King County Executive Dow Constantine  
401 5<sup>th</sup> Avenue #800  
Seattle, WA 98104

Dear Honorable Constantine:

Parks Legacy Project is the owner of the Druids Glen Golf Club and its associated 375 acres, of which 155 acres are the Golf Course. Our approach on all our projects is to be good stewards of the land while offering amenities as well as real estate assets that are contextually integrated and based on local community needs. To date we have invested over \$2 million into improving this course and have elevated it to one of the top 20 courses in the state.

As you know we made a proposal to amend the King County Comprehensive Plan to authorize use of the master plan resort provisions of RCW 36.70A.360. This would allow Druids Glen to further improve the Course with such amenities as a boutique resort Hotel with conference facilities, and other mixed-use assets such as smaller scale single family housing opportunities or attached townhomes.

This amazing property also provides us with the opportunity to create community assets and recreational amenities such as bike trails, fishing, camping, climbing and other environmentally friendly recreation. Our intention is to partner with the adjacent Kent Lake High School to support an environmental curriculum based on the on-site environment per our previously written and submitted comprehensive project narrative.

We are understandably disappointed to learn that we may be left out of the update of the King County Comprehensive Plan. That action could force us to a decision that we would rather not make: to terminate the golf course use and pursue our rights under the existing zoning of 1 dwelling unit per 5 Acres across the entire property, which will create approximately 60-75 (5 acre) estate properties in place of the existing golf course.

We have made it clear to our consultants that this is not our desired result. Our strong preference is to keep the golf course, preserve and enhance the open space, and add new environmentally sensitive recreational opportunities together with housing and hospitality components that match community needs and values while supporting local jobs and the economy.

While we respect the county's decision in this matter, it does force us to make this difficult business decision. We have a clear and required fiduciary responsibility to our investors to make business decisions in the best interest of their investment. Without the opportunity to create more income at Druid's Glen we see no alternative but to remove the property from current use taxation and utilize the existing underlying zoning to develop our property with five acre estates.

Even in compliance with King County development regulations, much of the land will need to be cleared and graded for home sites as well as the installation of roads, utilities, and other required infrastructure. The loss of the Druids Glen Golf Course and its open space will undoubtedly be met with disappointment by our neighbors in the nearby Remington subdivisions and by the players and friends of the golf club from Black Diamond, Maple Valley, Covington and Kent.

Perhaps we should have been clearer with county officials about the choices we face at Druid's Glen, however we thought the merits and public benefits of our proposal would earn us an opportunity to be included in the Comprehensive Plan update process. We respectfully request your reconsideration to allow us to be included in the initial SEPA process so that you can have the benefit of that additional information before deciding if our proposal should be in the ordinance that you will transmit to the County Council later this year. Additionally, by keeping our proposal in the process we would have the opportunity to address any concerns you or your staff may have.

Thank you for your consideration. We would welcome the opportunity to answer any questions or meet with you at any time to discuss this further.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan Mishkin". The signature is fluid and cursive, with a large initial "A" and a long, sweeping underline.

Alan Mishkin

Founder, Parks Legacy Project

Cc: Lauren Smith, Director of Regional Planning  
Shannon Braddock, Chief of Staff



Lauren Smith  
Mail Stop CNK-EX-0810  
401 Fifth Ave.  
Seattle, WA 98104

November 17, 2023

Dear Lauren:

I received your email of November 3 regarding our proposal to amend the King County Comprehensive Plan to create Master Planned Resort policies to authorize implementing development regulations.

Obviously, we are disappointed in your decision to reject our proposal and not provide any win-win suggestions. You state an unidentified "precedent" in the area and an existing code provision prohibiting clustering density on golf courses as your reasons. If the precedent you are concerned about is creating a boutique destination golf resort with the resultant economic and environmental benefits that also preserves approx. 300 acres as permanent dedicated open space, then I regard that as a missed opportunity rather than a precedent to be avoided. The code conflict you refer to is not a conflict, because the GMA's provision for rural Master Planned Resorts allows the County to write new rules that are specific to this property – the County is not bound by the existing code when adopting new code. The existing code, however, and its prohibition on transferring density from the golf course, will ensure that the golf course and the recreational open space it provides will go away with development under the existing code that your letter says the County prefers.

You stated that "If there are other improvements you are considering that don't rise to this level of urbanized development, we'd be happy to talk with you about those." We do not believe that a proposal that would dedicate approximately 65% of its land as open space can fairly be characterized as urbanized development.

Unfortunately, given our need to satisfy fiduciary investors, the County's decision to leave us out of the Comp Plan update would leave us with no option other than to pursue development of Druids Glen under the existing 5-acre zoning. While profitable, such development will result in elimination of the golf course and provide few environmental or public use benefits. The traffic issues will remain and the unfortunate result is the loss of the community, economic, environmental, and public use benefits of our proposal for a Master Planned Resort. The existing code mandates the development of housing that only the very well-to-do can afford, at a time when the Governor and the Legislature have finally recognized our housing crisis and the need for other, more affordable housing options. The existing code also eliminates the opportunity for a ten-fold increase in taxes to the County and significant job creation both temporary and permanent.





Our goal was to work with the County to design and develop a state-of-the-art, sustainable, self-sufficient and off-grid community of mixed assets, attainable housing, and a desirable and much needed boutique hotel and banquet facility.

After the first of the year, we will need to begin community outreach regarding the changes coming to Druids Glen. We would really prefer to have a plan that would include the golf and other amenities vs the 5 acre estates. Please let us know how we can work together to create a win-win-win. Win for the county, win for the community, and win for the owners. We are very open and adaptable.

As you may recall, we offered complete flexibility in our plan in order to meet the detailed needs of King County as we move through the process. This blanket rejection yields results that do not appear to benefit King County at all; loss of meaningful open space for public use and benefit, loss of significant tax base going forward, loss of an existing golf course serving the surrounding 8-10 miles and playing an average of 35,000 rounds of golf per year. Additionally, the loss of attainable housing options as well as visitor serving and job creating accommodations and banquet facilities.

This is truly a difficult decision to understand from our perspective and we look forward to brainstorming more positive options.

Sincerely,

Keith Mishkin  
Parks Legacy

cc.

- Dow Constantine
- Reagan Dunn
- Shannon Braddock
- Cody Eccles

14602 N Tatum Blvd.  
Phoenix, AZ 85032  
602-469-6600





# COMMUNITY AND ECONOMIC IMPACTS OF A DRUIDS GLEN MASTER PLANNED RESORT

DISCUSSION DRAFT

JANUARY 8, 2024



# BACKGROUND

Modern economics of the golf industry necessitate Druids Glen to ensure its financial viability of the golf operations.

However, redevelopment consistent with the current RA5 zoning would be a lost opportunity for the site and the community, requiring the closing of the golf course.

A thoughtful and environmentally sensitive redevelopment could transform the course into a successful, regional destination with significant tax, housing, employment, and recreational benefits using the Master Planned Resort (MPR) zoning designation.

## Research Statement

ECONorthwest was retained to prepare a tax and employment analysis of a potential redevelopment opportunity at Druids Glen on behalf of Parks Legacy Project.

For almost 50 years ECONorthwest has helped its clients make sound decisions based on rigorous economic, planning, and financial analysis. For more information about ECONorthwest, please visit [www.econw.com](http://www.econw.com).

This report was prepared by Morgan Shook, [shook@econw.com](mailto:shook@econw.com).



# Opportunity for Redevelopment

3

## **Lose Golf Course** Redevelop at RA5 Zoning

The current County Code does not currently contain a pathway to entitlement. The property's RA5 zoning authorizes low density development would not benefit the site or the environment, and does not permit hotel or motel uses, even as an accessory to the golf course. The project could not be permitted as a "Destination Resort" under KCC 21A.06.290 because such designation does not allow sewer outside the UGA. Under this code, the golf operation would cease and low-density housing of approximately 30 units could be constructed.

## **Keep Golf Course** Redevelop with MPR

Under the state Growth Management Act, an MPR is a large-scale, self-contained development based on an integrated, conceptual master plan, typically developed in stages depending on market demand or other factors. MPRs are Limited Areas of More Intensive Rural Development and may comprise urban densities and intensities of growth outside of Urban Growth Areas. Druids Glen is an ideal and unique location for the County's first MPR. Under this code, the following uses could be developed:

- Single Family Homes
- Middle Housing Homes
- Golf Chalets
- Wedding, Event, and Banquet Hall
- Boutique Hotel
- Recreational oriented retail
- Recreation and open spaces

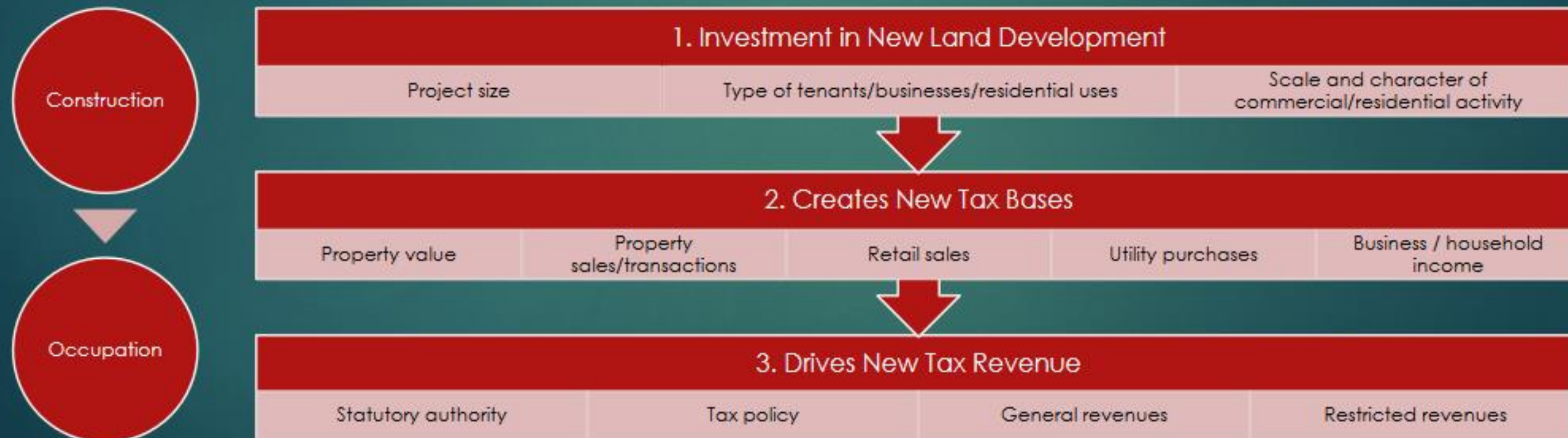


# How does development impact tax revenues?

4

Washington state tax policy has conditions that allow governments that grow their tax bases to collect additional revenues. This relationship creates a mutually reinforcing benefit of housing and commercial development with additional tax revenues.

As shown in the figure below, new land development represents a direct financial investment in land preparation and building structures. Those structures are then occupied by residential neighborhoods and businesses that increase the lands' productive economic capacity. That economic value generates taxable bases at the land, business operation, and transaction level, represented in land value, retail sales, business income, etc. State tax policy allows government jurisdictions to tax these bases to fund needed public services and infrastructure.





# TAX VALUE OF MPR ZONING

The use of the MPR allows for a range of uses and the continued operation of the golf course. If the MPR were to allow for a range of residential and commercial activity, it could deliver almost \$40 million in tax benefits to the county. This over 8 times the amount that would be enabled by the building on single family homes on the site.

(2023-2050)	No Golf - RA5 Zoning	With Golf - MPR Zoning
Property Tax	\$2,760,000	\$19,370,000
Sales Tax on Construction	\$780,000	\$5,720,000
On-going Sales Tax	\$70,000	\$5,990,000
Criminal Justice	\$200	\$1,900
State Shared Revenues	\$10,000	\$70,000
REET	\$1,190,000	\$8,350,000
Total	\$4,800,000	\$39,510,000

Tax revenues are generated through three major revenue streams:

1. The County collect property tax on its regional levies and the road levy for unincorporated area.
2. The county collects 2.2% of the total 8.7% sales tax (i.e., most of the sales tax flows to the state of Washington). It will also collect on series or dedicated sales taxes including for METRO.
3. The county will collect on the real estate excise tax (0.5%).





# EMPLOYMENT VALUE

Druids Glen currently employs golf professional staff in both full time and part time employment opportunities. Redevelopment at RA5 Zoning will mean that these job opportunities will go away.

The site can be a place of expanded economic opportunity with the MPR zoning. It both preserves the jobs from the current golf operations and expands jobs at the hotel venue.

With MPR zoning, the site would provide a different mix of jobs for residents in the local area.

## Hotel and Event Venue

A conference hotel would employ a range of skilled labor to operate the facility. Most of the jobs are full-time and come with benefits.

Total Jobs: 450

Industry Wages (Clerks, Cleaners): \$37,000 - \$66,000 / year

Management Wages: \$97,000 / year



# MPR HOUSING CHOICES

Due to this proximity to urban services and densities, the potential exists to develop Druids Glen at higher densities, served by municipal water and sewer and convenient to urban housing sufficient to support worker housing and commercial services for workers, residents, and guests in South King County, without the possibility of inducing sprawl in the rural areas.

The MPR development allows more affordable, attainable, and attractive housing. MPR development envisions multiple types of housing for different income levels in buildings designed and built according to the latest environmentally friendly techniques and materials.

King County needs to add 307,000 housing units to its urban area and 1,300 in its unincorporated areas by 2044. Current new housing in the area is affordable at 210% of the Area Median Income (income).

The MPR can allow for more attainable and attractive housing choices and address some the region's housing affordability challenges.

The current RA5 would only allow for 30 large 5-acre estates.

The inclusion of town homes, cottages, and clustered housing can come in a much more affordable price point than the existing zoning allows if the project can be developed under and MPR.

	Units	
	No Golf - RA5 Zoning	With Golf - MPR Zoning
Estates	30	0
Single Family	0	380
Town Houses	0	190
	Affordability	
	No Golf - RA5 Zoning	With Golf - MPR Zoning
Estates	210% AMI	N/A
Single Family	N/A	150% AMI
Town Houses	N/A	115% AMI



# OUTDOOR PURSUITS PLAN

The application of the MPR will allow Parks Legacy Project to:

- Create new recreational facilities like hiking trails, a mountain bike trail, fishing opportunities at Covington Creek.
- Connect new walking/hiking trail to the existing regional trail network on the north end of the site and provide a safe pedestrian route between Kent Lake High School and the Remington subdivision.
- Allow for a potential partnership with Kent Lake High School and area businesses catering to outdoor enthusiasts for a complete “Outdoor Pursuits” curriculum to include various skills training.

According to the Washington State Recreation and Conservation Office, trail users contribute over \$8.2 billion to Washington's economy and support over 81,000 jobs every year. Physical activity associated with trail use results in over \$390 million of health savings per year. The trails themselves and the ecological they provide are highly valued, providing Washingtonians with over \$8.5 billion in recreational-use value and \$5.9 billion in ecosystem services each year.



# SUSTAINABILITY

The application of the MPR will allow Parks Legacy Project to:

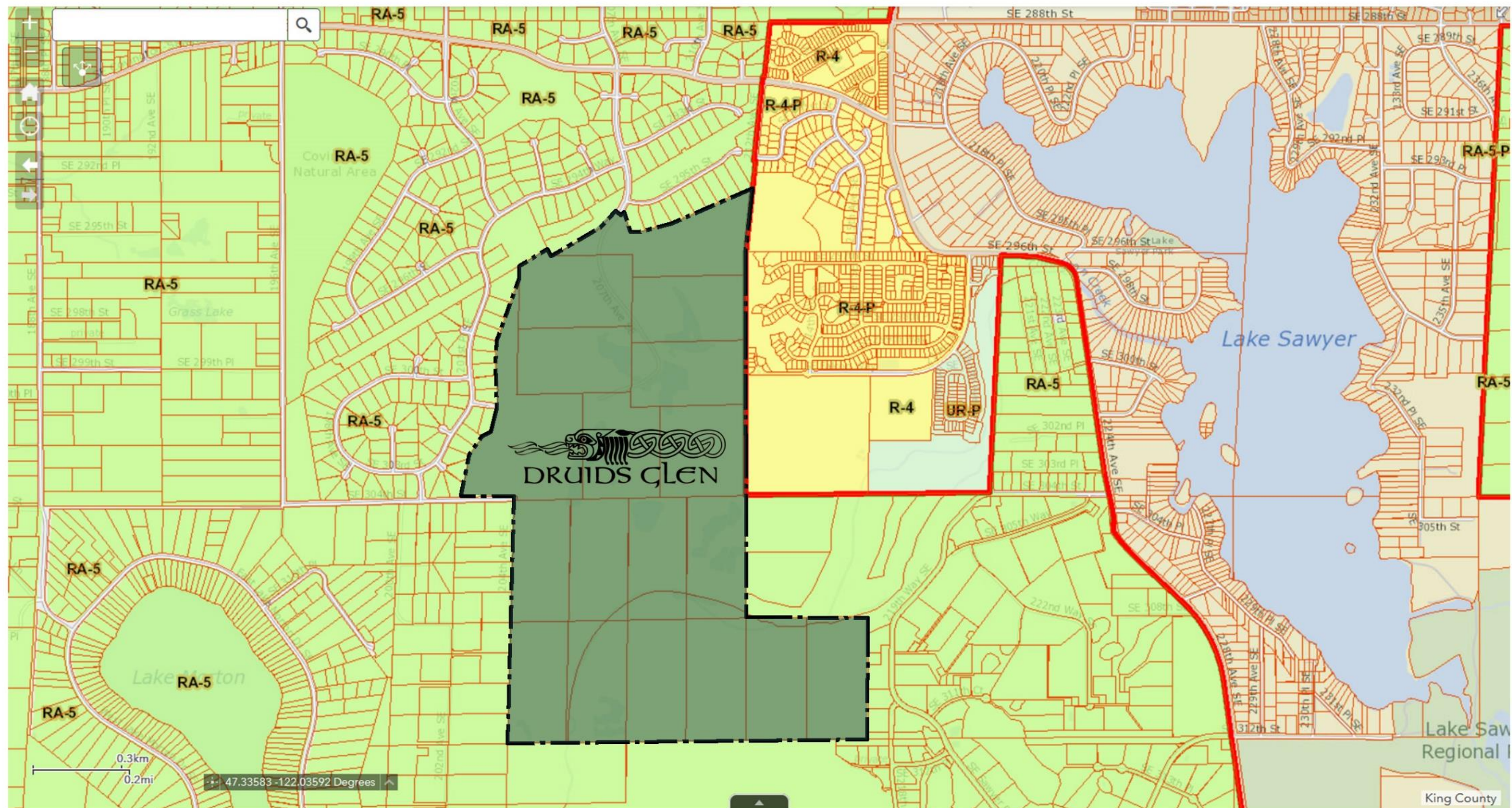
- Commitment to make the project "net zero" and produce no new greenhouse gases.
- Up to 70% of land maintained for community benefit in perpetuity.
- Retain native vegetation whenever possible in the development portions of the site.
- Provide additional protection to steep slopes, stream corridors, and wetlands, and allow them to be preserved as permanent open space.





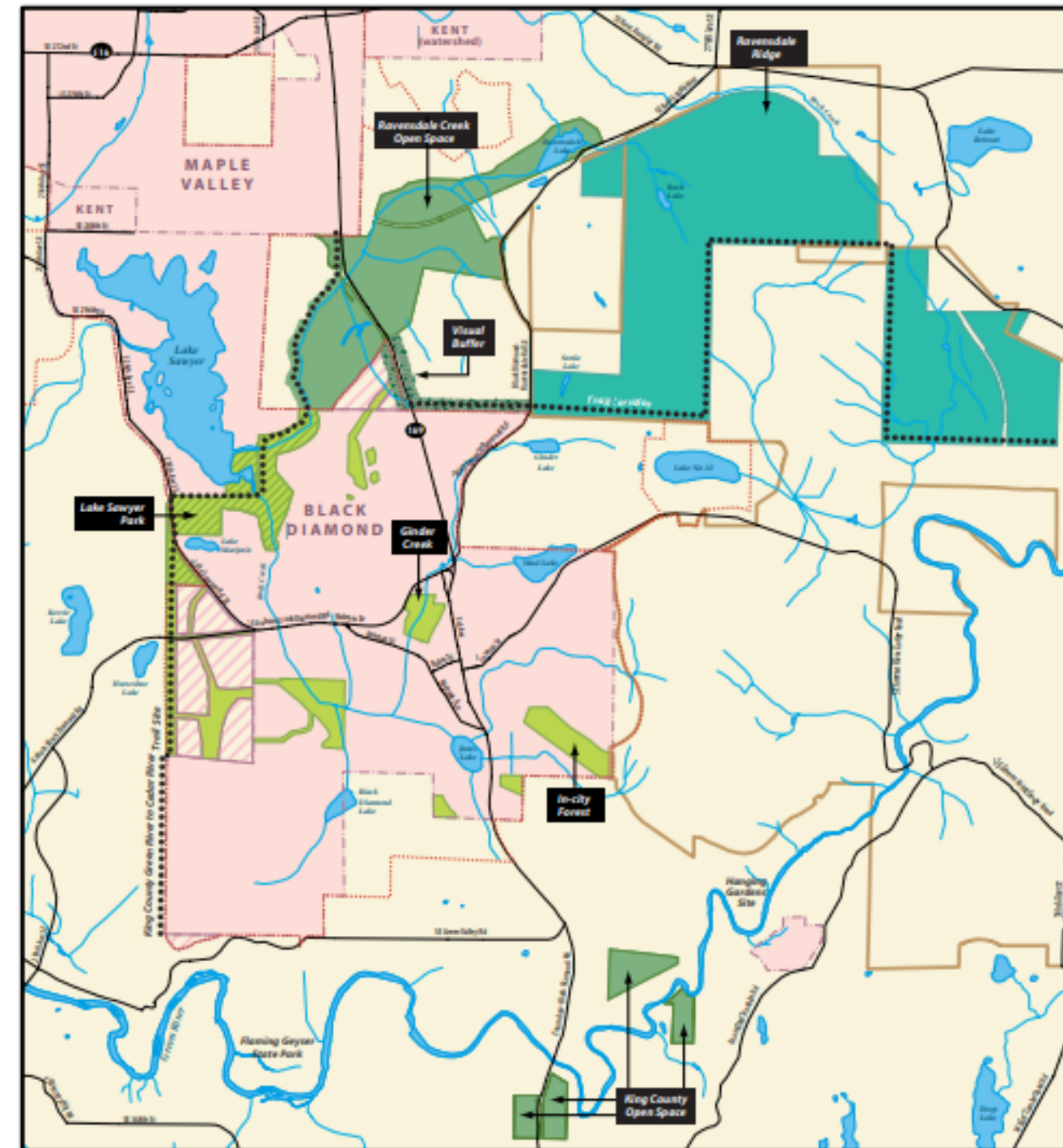








# Area Map Black Diamond Area Open Space Protection Agreement

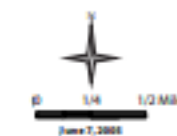


- |                          |                   |                                     |
|--------------------------|-------------------|-------------------------------------|
| Black Diamond Open Space | Streams           | Lake                                |
| King County Open Space   | Minor Road        | Incorporated Area                   |
| Conserved Forest Land    | Major Road        | Annexation Area                     |
| Visual Buffer            | Future Trail Site | Urban Growth Area Line              |
| Lake Sawyer Park         |                   | Forest Production District Boundary |

**Data Sources:**  
 Downloaded King County datasets: lakes, rivers/streams, urban growth area line, forest production district boundary.  
 Custom King County GIS Center datasets: in-city forest, annexation areas, King County open space, trails.  
 GIS Consulting Engineers, LLC (2008). In-City Open Space Forest, Gender O. Open Space, Section 2 Visual Buffer.

**Note:**  
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**Produced by:**  
 DWP GIS and W&P Visual Communications and Web Unit  
**Map File:**  
 06/07/11 Cart/Finished/0200P/0000\_BLACKDIAMOND/PLAND/LA 0108  
**GIS Data File:** (W&P GIS Archive)  
 0200P1/Projects/06/06/000000







## EXISTING CONDITION

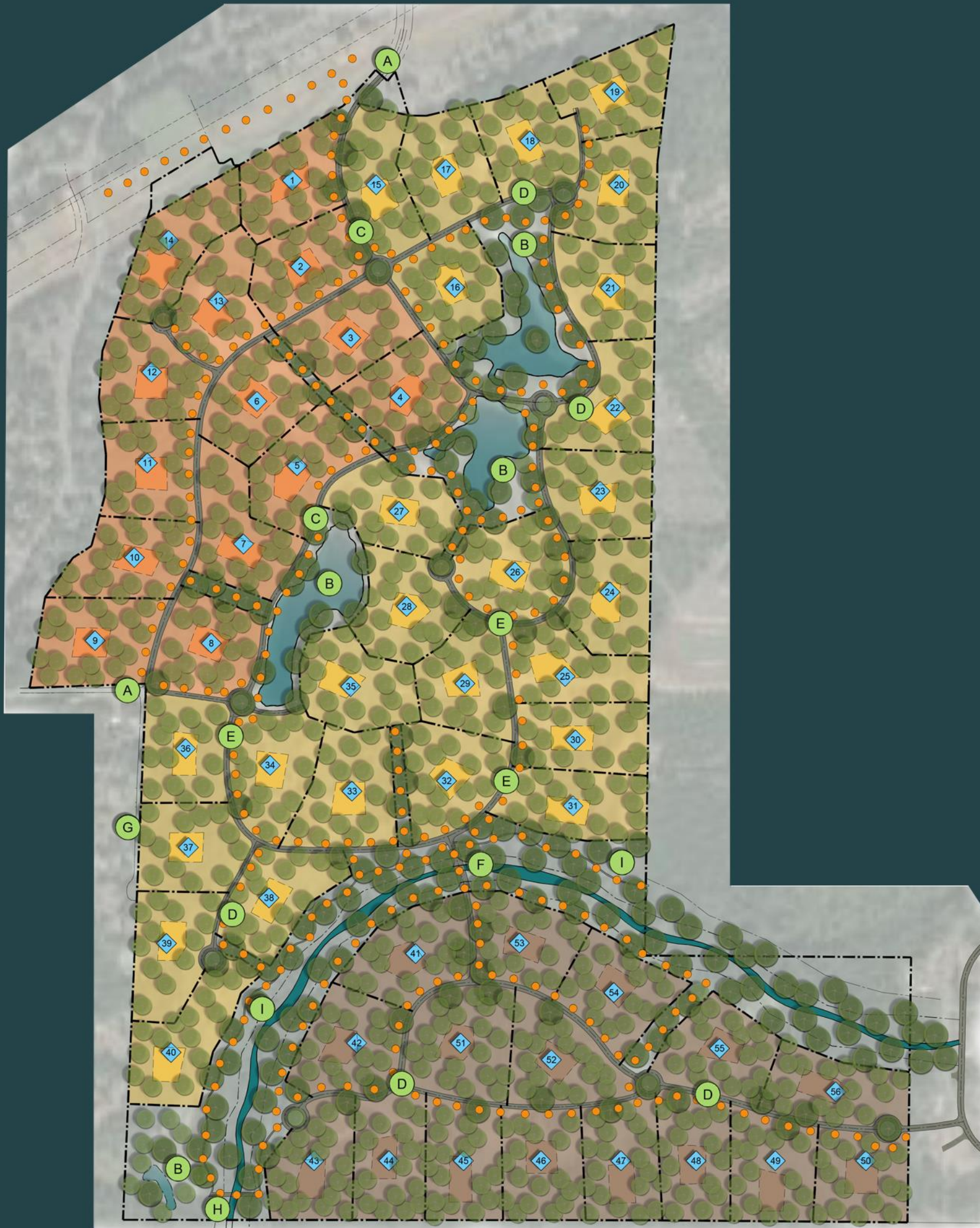
- A** EXISTING ENTRY
- B** EXISTING MAINTENANCE BLDG
- C** EXISTING GOLF POND (S)
- D** EXISTING VEHICULAR DRIVE
- E** EXISTING DRY POND
- F** EXISTING FAIRWAY
- G** EXISTING SAND TRAP
- H** EXISTING TEE BOX
- I** EXISTING PUTTING GREEN
- J** EXISTING WATER FEATURE / POND / LAKE
- K** EXISTING COVINGTON CREEK
- L** EXISTING ACCESS GATE
- M** EXISTING ACCESS EASEMENT
- G#** GOLF HOLE NUMBER

## PROPOSED IMPROVEMENT

- 1** ATTACHED TOWNHOMES
- 2** SINGLE FAMILY (8,000-10,000 S.F. LOTS)
- 3** SINGLE FAMILY (6,000 S.F. LOTS)
- 4** STAY & PLAY CHALETES
- 5** TOWNHOME 8-12 D,U./ACRE
- 6** 1 ACRE ESTATE LOTS
- 7** PROPOSED VEHICULAR BRIDGE OVER CREEK
- 8** PROPOSED RESIDENTIAL DRIVE
- 9** MOUNTAIN BIKE TRACK (VERTICAL OVER 100')
- 10** FISHING GOLF OVER GOLF POND
- 11** EXISTING GOLF CART BRIDGE OVER COVINGTON CREEK
- 12** FAUX BRIDGE OVER HOLE #3
- 13** RECREATIONAL BLDG - BIKE SHACK -
- 14** HOTEL & LODGE W/ MOUNT RANIER VIEW (2nd LEVEL ARRIVAL)
- 15** PEDESTRIAN / BIKE PATH (REGIONAL LINKAGE PROPOSED)
- 16** PROPOSED NEW MAIN DRIVE

COLOR MARK	MARK	AREA DESCRIPTION	D.U./AC OR S.F./U
	1	ATTACHED TOWHOMES	10 D.U./AC
	2	SINGLE FAMILY	9,000 S.F.
	3A	SINGLE FAMILY	6,000 S.F.
	3B	SINGLE FAMILY	6,000 S.F.
	3C	SINGLE FAMILY	6,000 S.F.
	4	TOWHOMES	12 D.U./AC
	5	RECREATIONAL VEHICULAR PARK	10 R.V./AC
	6	STAY & PLAY CHALETES	5 D.U./AC





MARK	TOTAL AREA AC	TOTAL AREA S.F.
1	5.3	230,008
2	5.3	230,009
3	5.3	230,008
4	5.3	230,007
5	5.3	230,006
6	5.3	230,008
7	5.7	252,636
8	5.3	230,006
9	6.3	276,734
10	5.3	230,007
11	5.3	230,009
12	5.3	230,008
13	5.3	230,009
14	5.3	230,006
15	5.3	230,006
16	5.3	230,004
17	5.3	230,008
18	5.3	230,006
19	5.3	230,009

MARK	TOTAL AREA AC	TOTAL AREA S.F.
20	5.3	230,004
21	5.3	230,008
22	5.3	230,006
23	5.3	230,008
24	5.3	230,009
25	5.3	230,005
26	6.1	267,462
27	5.3	230,009
28	5.3	230,006
29	5.3	230,009
30	5.3	230,009
31	5.4	237,087
32	5.7	248,363
33	6.1	268,635
34	5.4	251,340
35	5.3	231,039
36	5.3	230,009
37	5.3	230,007
38	5.3	230,006

MARK	TOTAL AREA AC	TOTAL AREA S.F.
39	5.3	230,007
40	5.7	250,009
41	5.8	252,903
42	5.7	248,424
43	5.3	230,008
44	5.3	230,005
45	5.3	230,005
46	5.3	230,006
47	5.3	230,009
48	5.3	230,008
49	5.3	230,005
50	5.3	230,005
51	6.7	293,342
52	5.8	255,373
53	5.3	230,005
54	5.3	230,008
55	5.3	233,734
56	5.2	230,360

NOTE:  
ALL BUILDING ENVELOPES TO BE SITED AMONG  
NATIVE VEGETATION NOT TO BE DISTURBED  
AT 20,000 S.F. BUILDABLE AREA AT GROUND  
FLOOR MAX

COLOR MARK	PRODUCT TYPE
	RANCHETTES
	EXECUTIVE ESTATES
	CREEK VIEW STATES

## LEGEND

- A EXISTING ENTRY
- B EXISTING GOLF POND (S)
- C EXISTING MAIN VEHICULAR DRIVE
- D PROPOSED RESIDENTIAL DRIVE
- E PROPOSED NEW MAIN DRIVE
- F PROPOSED VEHICULAR BRIDGE OVER CREEK
- G EXISTING PRIVATE DRIVE
- H EXISTING GOLF CART BRIDGE OVER COVINGTON CREEK
- I PEDESTRIAN / BIKE PATH (REGIONAL LINKAGE PROPOSED)



# Summary of Community Economic Benefits

# Comp Plan Changes CREATES Large Benefits

- **No Comp Plan Change:**  
Redevelop to Existing Housing Zoning

- 60 acre + housing units

- **Comp Plan Change:**  
Preserves golf and open space  
Creates resort and event space  
Provides a diversity of housing

- 200 key hotel
- 25,000 square foot event space
- 5,000 square foot outdoor retail
- 16 golf chalets
- 170 townhomes and attached housing
- 380 single family homes
- 4 acre + housing units



# Comp Plan Changes CREATES Large Benefits



**Hundreds of millions of investment in the unincorporated community**



**Creation of one-time construction jobs and on-going jobs related to the resort**



**Large tax benefits to the county - Approximately 10X impact over existing zoning**

Grows property taxes over 1% limit (general fund levy, road levy, dedicated levies)

Grows sales tax on construction and retail (county local option, METRO, and human services)



**Helps address housing shortages in the county – more housing opportunities**



**Diversity of housing types addresses affordability – more attainable price offerings**

# Housing development at Druids Glen will be an exemplar of Innovation in Sustainability and Energy Efficiency

- EPA WaterSense
  - Reducing water consumption by 50%
- EPA Energy Star
  - Reducing energy consumption by 50%
- DOE Zero Energy Ready Home (ZERH)
- Focus on adapting state of the art means and methods of construction at the height of sustainability



- WFPA
- Renewable energy
- Wildlife learning center
- Adaptive reuse of onsite lumber
- Potential commercial septic or packaged sewer plant
- Thermal properties of building envelope support “well” standards

# Druids Glen Estimate of probable Construction Cost-Option 1 and 2

## **Option 1- Outdoor Pursuits Plan**

1. Hotel-200 Keys at 350 SF +Banquet Facilities and common areas-assume 100,000SF at \$500/SF=\$50M
2. 350 Homes average SF of 1850 X \$300/SF= \$194 M
3. Infrastructure including streets/pads/utilities=\$25M
4. Community buildings, amenities, landscape, trails, paths, contingency-environmental-fees-tax= \$20M

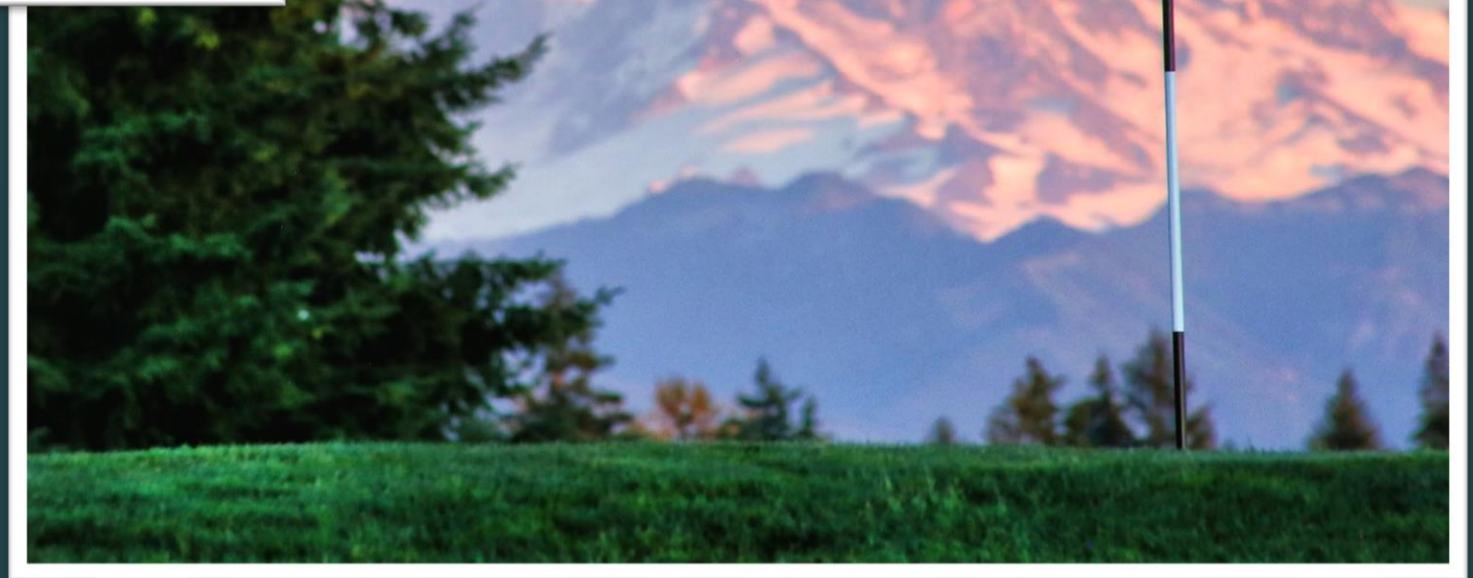
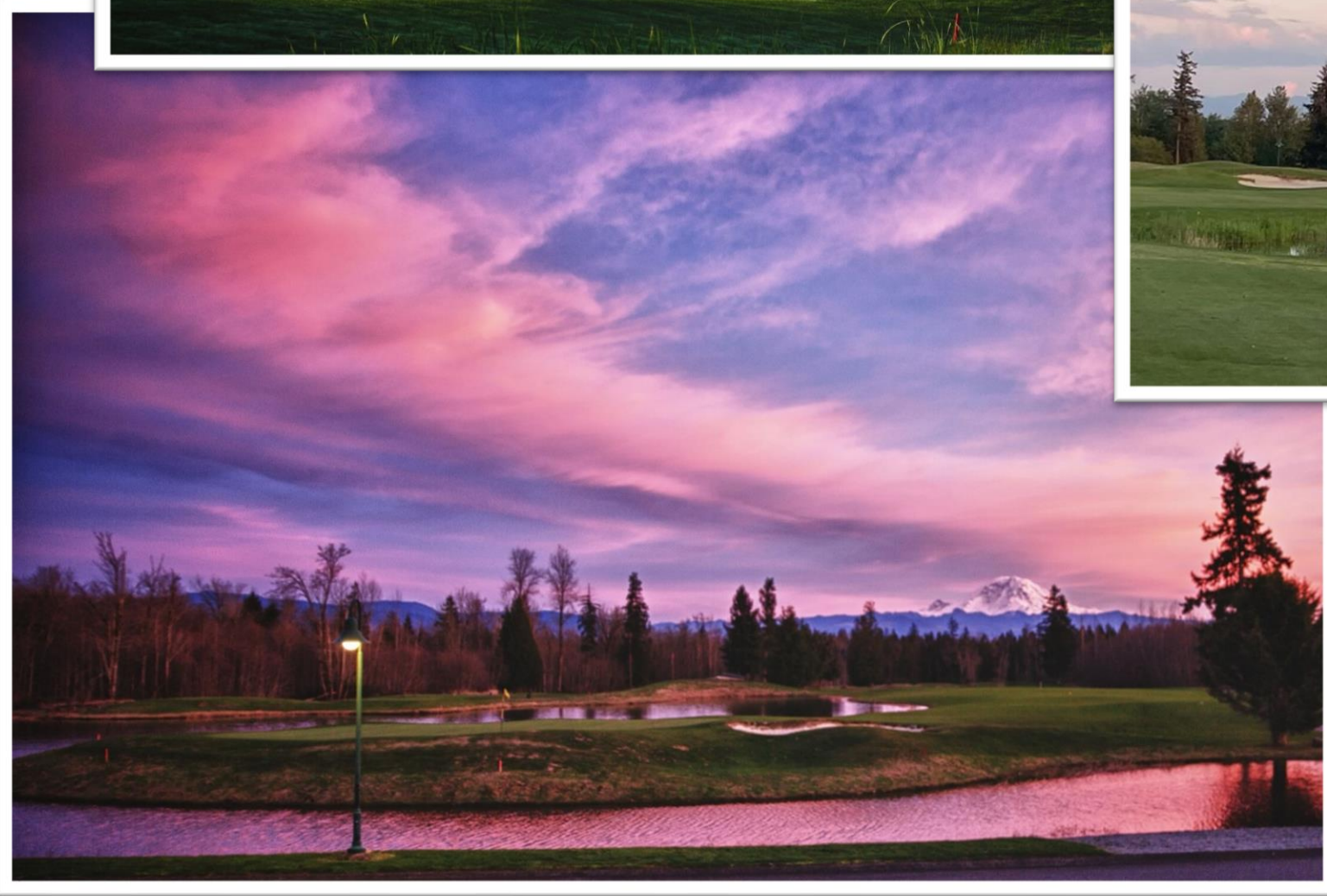
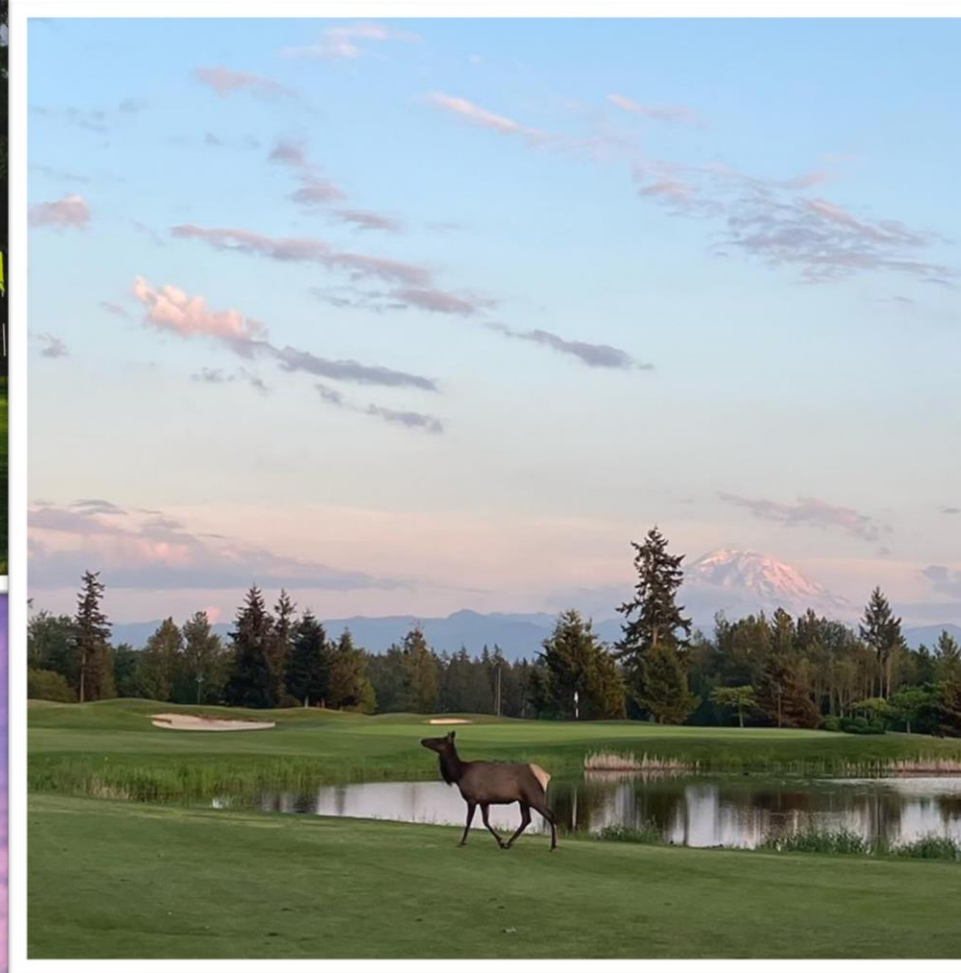
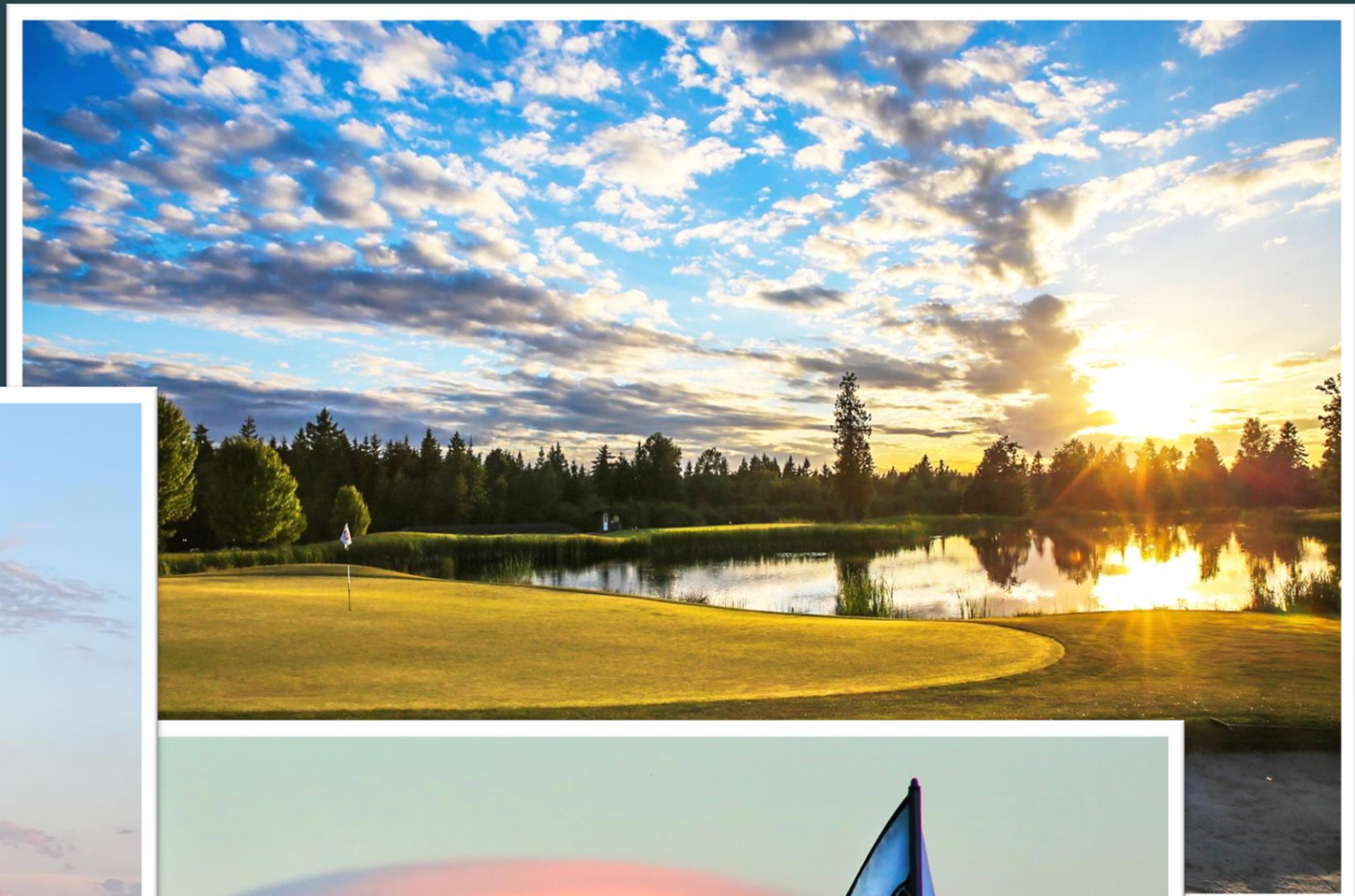
Total Project Cost (ROM) estimated at \$275,000,000-\$300,000,000  
Estimate of Job Creation 4,200- 6,000 Jobs

## **Option 2- 5 acre Estate Plan**

1. Clear and grub Golf Course @ \$10,000/Acre=\$1.5 M
2. Streets and Infrastructure-\$250K per plot x 56 Plots=\$14M
3. Landscape, Amenities, Community Buildings, Signage, Security=\$8M
4. Penalty/Back Tax for change of Land Use? (TBD)
5. Contingency \$3M

Total Project Cost=\$26.5M plus land use designation tax  
Estimate of Job Creation 350-500 Jobs







**From:** [Ian Morrison](#)  
**To:** [Compplan Sepa](#)  
**Subject:** DEIS comment  
**Date:** Wednesday, January 31, 2024 7:50:37 PM  
**Attachments:** [JK Morris LLC Periodic Update DEIS Comment 2024.01.31.pdf](#)

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

Dear Ivan,

Please see attached comment on the County's Draft EIS on the Comp Plan Update from JK Morris, LLC. Thank you for your consideration.

Ian

Ian S. Morrison  
Partner

**McCULLOUGH HILL PLLC**

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January 31, 2024

King County Office of Performance, Strategy, and Budget  
Attn: Ivan Miller  
401 Fifth Ave, Suite 810  
Seattle, WA 98104  
Email: [CompPlan.SEPA@kingcounty.gov](mailto:CompPlan.SEPA@kingcounty.gov)

VIA EMAIL

Re : King County 2024 Comprehensive Plan Update  
Draft Environmental Impact Statement

Dear Mr. Miller:

On behalf of JK Morris, LLC, thank you for the opportunity to comment on the Draft Environmental Impact Statement ("DEIS") for the 2024 King County Comprehensive Plan Update ("2024 Update") and the accompanying June 2023 Public Review Draft ("Public Review Draft") of the 2024 King County Comprehensive Plan ("Plan"). As you may already know, JK Morris, LLC owns the Seattle Pet Cemetery at 23646 Military Road South ("Property") in King County ("County"). The Property has long been used as a pet cemetery and is also the site of a permitted cell tower, the revenue from which is used to help maintain the King County landmarked Property.

The Public Review Draft includes a proposed amendment to the Plan's map, which would rezone the Property to the County's most restrictive urban zoning designation, R-1 ("Proposed Downzone"). This Proposed Downzone is based on a June 2023 County study titled "Kent Pet Cemetery Area Zoning and Land Use Study" ("Study"). We respectfully request that the Proposed Downzone not be incorporated into any Action Alternative included in the Final Environmental Impact Statement ("FEIS") for the 2024 Update or in the 2024 Update itself. As discussed in greater detail below, the Proposed Downzone conflicts with the language of the FEIS, the King County Code, and the Comprehensive Plan in its current and proposed versions. If adopted, the Proposed Downzone also appears to be at risk of violating Washington state case law against spot zoning.

### **The Proposed Downzone contradicts the requirements of the R-1 Zone.**

The current Plan and the Public Review Draft state that the County "should apply the urban residential, low land use designation in limited circumstances in unincorporated urban areas in order to protect: floodplains, critical aquifer recharge areas, high function wetlands and unstable slopes from degradation, and the link these environmental features have to a network of open space, fish and wildlife habitat and urban separators." (King County Comprehensive Plan Goal U-120)(emphasis added). The DEIS reaffirms the R-1 zone's limited application using Goal U-120's exact language. *See* pg. 133.

Instead, the DEIS notes: "The Current Plan includes a minimum density requirement for all new urban residential developments stipulating a zoned density of 4 or more homes per acre." *Id.*, pg. 125. Correspondingly, the Plan states that the County "should apply minimum density requirements to all unincorporated urban residential zones of four or more homes per acre, except under limited circumstances such as the: a. Presence of significant physical constraints such as those noted in policy U-120, or b. Implementation of standards applied to a property through a property-specific development condition, special district overlay, or subarea study." Both Plan policies

indicate that R-1 zoning is only warranted in limited circumstances to preserve critical areas or through a property-specific development condition, special district overlay, or subarea study.

Here, the Property does not meet any of the Code conditions required for an R-1 designation. The Study acknowledges the Property "...is relatively flat, and there (sic) no known environmental constraints on the site or in the immediate vicinity." This admission defeats the assertion that there are the "presence of significant physical constraints such as those noted in policy U-120." The Property is not subject to standards through a special district overlay or subarea study.<sup>1</sup> The Proposed Downzone does not seek to apply property-specific development conditions but instead seeks to impose an isolated application of general R-1 zoning standards. Therefore, the Property fails to meet the conditions required to overcome the Plan's presumption against R-1 zoning. Because the Property meets none of the conditions for an R-1 designation, the County should remove the Proposed Downzone in any documents related to the 2024 Update, including any Action Alternative incorporated into the FEIS, and not proceed with the Proposed Downzone.

### **The Proposed Downzone likely violates Washington laws against spot zoning.**

Under the Code, a "...zone reclassification shall be granted only if the applicant demonstrates that the proposal complies with the criteria for approval specified in K.C.C. 20.22.140 and 20.22.150 and is consistent with the Comprehensive Plan and applicable community and functional plans." K.C.C. 21A.44.060. The R-1 zone is appropriate primarily where environmental constraints require limited development. Here, the Property is subject to no such environmental constraints. R-1 designation is also appropriate in well-established R-1 subdivisions with sufficient public services. No properties adjacent to the Property are zoned R-1. Indeed, before it was designated Industrial, the Property was zoned Neighborhood Business, the same zoning designation as properties to the north and south. The Code does not support the Proposed Downzone.

Should the County elect to proceed with the Proposed Downzone, it may give rise to challenges for spot zoning. Spot zoning is a zoning action "by which a smaller area is singled out of a larger area or district and specially zoned for a use classification totally different from and inconsistent with the classification of surrounding land, and not in accordance with the comprehensive plan." See *Achen v. Clark Cnty.*, 112 Wn. App. 1034 (2002) (quotation omitted). A spot zoning is invalid if it grants a discriminatory benefit to one or a group of owners to the detriment of their neighbors or the community at large without adequate public advantage or justification. See *Vogel v. City of Richland*, 161 Wn. App. 1036 (2011) (citation omitted). "Actions are characterized as rezoning when there are specific parties requesting a classification change for a specific tract." *Cathcart-Maltby-Clearview Cmty. Council v. Snohomish Cnty.*, 96 Wn.2d 201, 212 (1981). Lastly, as the County is well aware, "neighborhood opposition alone may not be the basis of a land use decision." *Henderson v. Kittitas Cnty.*, 124 Wn. App. 747, 755 (2004) (citations omitted).

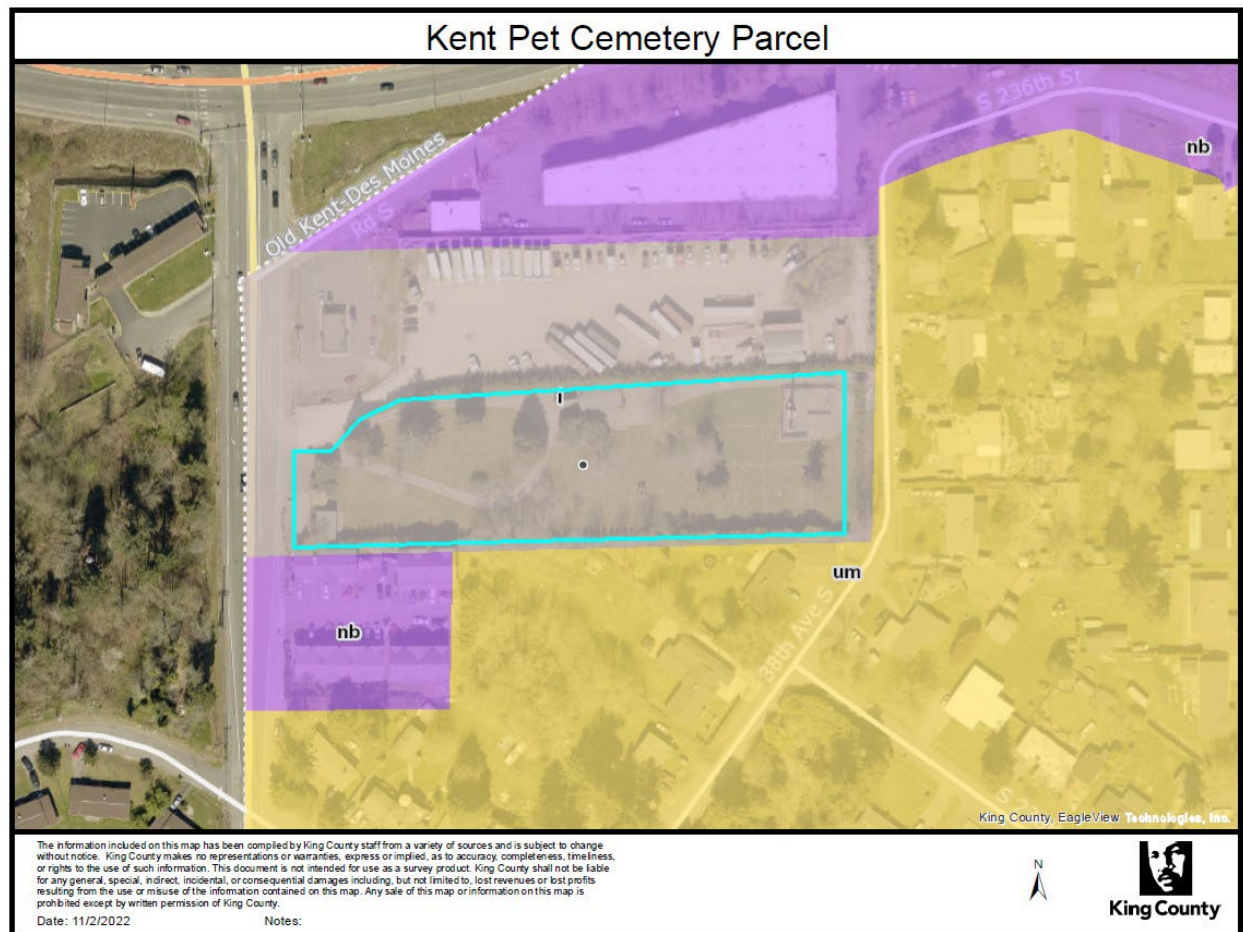
Here, the record is clear that the impetus for the Proposed Downzone is a small group's opposition to the cell tower that is legally permitted on the Property. See Hellmann, Melissa. "Pet Cemetery Patrons Neighbors Wage Lengthy Fight Against Kent Cell Tower," Seattle Times, Aug. 2., 2021, available at: [www.seattletimes.com/seattle-news/pet-cemetery-patrons-neighbors-wage-lengthy-fight-against-kent-cell-tower](http://www.seattletimes.com/seattle-news/pet-cemetery-patrons-neighbors-wage-lengthy-fight-against-kent-cell-tower) (last accessed on Jan. 31, 2024); see also Crowe, Michael. "A Fight to Stop a Cell Tower in a Pet Cemetery," KOMO News, Oct. 19, 2020, available at:

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<sup>1</sup> Per KCC 20.08.175, "Subarea studies' are separate from area zoning and land use studies defined in KCC 20.08.037."

[www.king5.com/article/news/local/a-fight-to-stop-a-cell-tower-in-a-pet-cemetery/281-42280a7f-930d-4057-8101-1048417d32e4](http://www.king5.com/article/news/local/a-fight-to-stop-a-cell-tower-in-a-pet-cemetery/281-42280a7f-930d-4057-8101-1048417d32e4) (last accessed on Jan. 31, 2024); Seitz, Julie. “Environmental Justice Scorecard’ and cell tower placement.” Letter to White House Environmental Justice Interagency Council, Aug. 18, 2022, available at: <https://ehtrust.org/letter-to-white-house-environmental-justice-interagency-council-calls-for-addressing-cell-tower-issues/> (last accessed on Jan. 31, 2024).

The County is well aware of Ms. Seitz’s advocacy against the Property’s permitted cell tower use. First, despite Ms. Seitz’s advocacy, the fact remains the cell tower facility was (and is) legally permitted. Second, Ms. Seitz’s advocacy is not a valid legal basis for the County to adopt the Proposed Downzone of Property. None of the surrounding properties are zoned R-1. Indeed, most are zoned for commercial or industrial use, as seen in the County’s own Study.



The Study itself notes that the Proposed Rezone would attempt to “resolve” the nonconforming status of one use, the pet cemetery, by turning an existing permitted cell tower use into a nonconforming use. The Study states that the Property’s current uses “are likely to continue” under the Property’s current zoning. The Study also states that the Proposed Downzone is “unlikely to impact the cell tower use.” Thus, the Study states that nothing about the Proposed Downzone will change the Property’s use. The Study’s only arguments for the Proposed Downzone are that allowing cemetery uses to be conforming “would also support the historic designation and be consistent with zoning on another cemetery in the urban unincorporated area.” These are not



reasons to justify the isolated designation of a property as R-1 when that property meets none of the Plan's or Code's requirements for a site-specific rezone. Moreover, where the impetus for the zoning change appears, in key part, to be driven by a small cohort of vocal opponents, the County is at increased risk of a spot zone challenge should it elect to proceed with the Proposed Downzone.

**The Proposed Downzone contradicts the Comp Plan's telecommunications goals.**

As the Plan notes, "Telecommunication systems will need to grow to continue to support government, business, resident, education, health, service sector, and mobile communication needs." In recognition of this need, Goal F-345 of the Public Comment Draft states, "Telecommunication services ~~((are to))~~ shall be encouraged ~~((as a means))~~ to mitigate the transportation impact of development and growth, including ~~((G))~~greenhouse ~~((G))~~gas ~~((E))~~emissions." Similarly, Goal F-346 of the Public Comment Draft states, "King County should encourage~~((s the))~~ telecommunication service providers to engage in long-term planning for telecommunications construction, reconstruction, and facility upgrades, including provisions to ensure that the system's capacity, design, and equipment will allow users to take advantage of innovative uses, services, and technology." The Proposed Downzone, which is admittedly crafted to convert the Property's legally established cell tower into a new nonconforming use, works to defeat these Comp Plan goals.

The DEIS fails to mention any environmental review of proposed map amendments, including the Proposed Downzone. It also fails to incorporate or even reference any such review outside the DEIS itself. The DEIS is silent on any analysis of the Proposed Downzone or its impacts or consistency with the current and future Comprehensive Plan goals and policies.

For all the above reasons, we respectfully request that the Kent - Pet Cemetery Amendment be removed from the 2024 Update as you proceed forward. Alternatively, we request that the EIS be updated to allow for accurate analysis of the County's proposed map amendments, including the Proposed Downzone and their respective potential impacts on the Land Use, Housing, Economic Development, and Services, Facilities and Utilities Elements, among others, and sufficient time be provided to review and comment on the adequate environmental analysis before the County proceeds with any legislative action.

Thank you for the opportunity to comment. Please contact me directly with any questions.

Sincerely,

s/Steve & Julie Morris  
Managers, JK Morris, LLC

**From:** [Nelson, Maxwell](#)  
**To:** [Legislative Staff, Council CompPlan](#)  
**Cc:** [Mayhew, Robin](#); [Leth, Mark](#); [Phelps, Travis](#); [Mike Swires](#); [Kenna, Matthew](#); [Storror, Jeff](#); [Smith, Lauren](#); [Miller, Ivan](#)  
**Subject:** WSDOT Comments on King County Comprehensive Plan and EIS  
**Date:** Thursday, February 1, 2024 8:42:38 AM  
**Attachments:** [WSDOT comments on King County comp plan and EIS.pdf](#)

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

To the King County Comprehensive Plan Update Team,

Please find attached: WSDOT's comments on the King County Comprehensive Plan and associated EIS

(I tried to send this by COB yesterday, according to Outlook it was "outboxed" rather than transmitted)

Thank you,

-Max

January 31, 2023

Chinook Office Building  
401 Fifth Ave, Suite 810  
Seattle, WA 98104

**Subject: WSDOT Comments on the King County Comprehensive Plan and EIS**

Dear Mr. Ivan Miller, Ms. Lauren Smith, and the King County Comprehensive Plan update team,

The Washington State Department of Transportation (WSDOT) appreciates the opportunity to review and comment on the King County's (county) draft Comprehensive Plan and the accompanying draft Environmental Impact Statement (EIS) and project list. WSDOT offers the following comments in support of the county's planning efforts.

**Draft EIS Alternatives**

WSDOT recognizes the importance of coordinated land use and transportation strategies to effectively manage demand and provide travel options for Puget Sound residents. We are pleased to see that the county is evaluating several alternatives. We are particularly interested in the county's Alternative 2 because of its potential to limit conversion of rural land, promote a land use pattern that provides for greater housing and employment opportunities within walking distance to transit, and promote the use of the regional and local transit system. For example, supportive policies are included that call for limiting the amount of residential development in rural areas and prohibiting new Fully Contained Developments.

Alternative 2 also aligns with the vision, mission, values, and goals included in [WSDOT's Strategic Plan](#). Alignment between these plans help advance our shared goal of providing the public with a safe, sustainable and integrated multimodal transportation system that meet the travel challenges of today and the growing demands of tomorrow. We look forward to continuing our partnership as the county works towards adopting and implementing its plans.

While Alternative 2 is an excellent starting point, WSDOT is concerned with some of its proposed policy changes. Page 44 of the draft plan suggests that Alternative 2 would include "substantive updates to the Four-to-One program requirements", including "Using joint planning area boundaries." This proposed change is inconsistent with the recommendations of the Growth Management Policy Council to use the original adopted UGAs as a baseline for proposed expansions. WSDOT provided comments throughout the GMPC's process to review the Four-to-One Program and supports the comprehensive plan incorporating the policy changes consistent with GMPC's final recommendations.

**Transportation Plan and Transportation Needs**

WSDOT appreciates the county's consideration of all travel modes in its project list. Promoting alternatives to single occupancy vehicle travel reduces demand on the transportation system and helps the county and the state achieve our shared goals of VMT and greenhouse gas reduction. The inclusive public outreach conducted by the county to generate the bike, pedestrian and shared streets sections of the plan is also invaluable for both the county and WSDOT's Complete Streets efforts to build a complete bike and pedestrian network across county and state facilities. As projects move forward, WSDOT encourages the county to design its facilities –

where appropriate—in keeping with state standards, specifically to a Level of Traffic Stress (LTS) 2 or better. For more information, see the WSDOT design manual, specifically [Chapters 1510 – Pedestrian Facilities](#), [1515 – Shared-Use Paths](#), and [1520 – Bicycle Facilities](#).

In 2022, the Washington State Legislature passed [Senate Bill 5974](#), the Move Ahead Washington package. The bill directs WSDOT to incorporate the principles of Complete Streets in most state transportation projects. More information, including staff contacts, can be found on WSDOT's [Complete Streets](#) webpage. WSDOT encourages local agencies to use their comprehensive plans as an opportunity to conduct inclusive community outreach and identify locations where state facilities present a barrier to nonmotorized connectivity. We encourage King County to consider how these facilities might fit into its broader active transportation network on County-owned roads and trails.

### **Other Comments**

Appendix D1 of the draft plan identifies jurisdictions with a potential inconsistency between capacity and projected growth, in both employment and housing. WSDOT appreciates the county's attention to detail in this matter. Jobs/housing balance is a key land use goal, and addressing mismatch in capability and need to accommodate growth is a key step toward achieving it.

WSDOT also concurs with the recommendations of the Snoqualmie Interchange Area Zoning and Land Use Study that is included in 2024 Comprehensive Plan appendices. As we communicated to the King County GMPC in 2023, we support maintaining the parcels adjacent to the new Interstate 90/Highway 18 Interchange in its current rural zoning classification, and that the UGA not be expanded in this area.

Finally, whichever of the alternatives in the draft EIS the county chooses to advance, WSDOT encourages the county to re-examine the projects in the Transportation Needs Report in the context of the newly adopted alternative. The three scenarios differ substantially in how they direct population and employment growth, which are key factors in determining which transportation investments should be prioritized.

### **WSDOT Planning Resources**

WSDOT's comprehensive planning resources for local agencies can be found on our [Land Use and Transportation Guidance](#) page. This includes a wealth of information on how WSDOT reviews local agency plans, our land use and transportation goals, best practices in building transportation efficient communities, and pertinent concurrency and SEPA guidance.

WSDOT's [Community Planning Portal](#) may be particularly helpful for local jurisdictions. The portal includes data on the state transportation system often needed to complete the transportation element inventory required by the Growth Management Act. In addition to the data included in the portal, local planners can add their own data to ArcGIS Online and create custom reports.

### **Further Engagement & Coordination**

WSDOT appreciates being included in King County's planning process. Please reach out if you would like to discuss opportunities for ongoing engagement and coordination, as well as technical assistance available during your work updating your plans.

Thank you again for the opportunity to review the King County Comprehensive Plan. We look forward to our continuing productive partnership.

Sincerely,

Jeff Storrar, Policy Manager  
WSDOT's Management of Mobility Division

CC:

Robin Mayhew, WSDOT Deputy Northwest Regional Administrator

Mark Leth, WSDOT Assistant Regional Administrator – Traffic

Travis Phelps, WSDOT Management of Mobility Director

Mike Swires, WSDOT Assistant Regional Administrator – Traffic

---

**From:** Compplan Sepa  
**To:** Tracy, Jake; Compplan; Compplan Sepa  
**Cc:** Auzins, Erin  
**Subject:** RE: Comp Plan EIS public comment

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**From:** Amy Taylor <[amycattaylor@gmail.com](mailto:amycattaylor@gmail.com)>  
**Sent:** Tuesday, February 13, 2024 1:46 PM  
**To:** Legislative Staff, Council CompPlan <[CouncilCompPlan@kingcounty.gov](mailto:CouncilCompPlan@kingcounty.gov)>  
**Subject:** Comp Plan EIS public comment

This is a very nit picky small comment, but on Figure 4.1-1 of the draft EIS, page 107 - In the North Highline/White Center area, Water District 45 no longer exists. That area was absorbed into Water District 20 a few years ago after residents voted to consolidate. Probably should update this map.

Thanks!  
Amy Taylor