



King County

2016

King County Comprehensive Plan Update

Executive Recommended Plan

PUBLIC PARTICIPATION REPORT

March 1, 2016

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I. OVERVIEW OF PUBLIC COMMENT PERIOD

The **2016 Comprehensive Plan Update** included a strong and on-going public engagement process. This process included the following components:

- Meetings with community groups, interested parties, County Commissions, the Planning Directors groups, and others in multiple stages of the update process.

<ul style="list-style-type: none"> • King County Planning Directors (2/26) – 30 attendees 	<ul style="list-style-type: none"> • Four Creeks/Tiger Mountain CSA Open House (5/12) – 40 attendees
<ul style="list-style-type: none"> • Greater Maple Valley UAC (3/1) – 10 attendees 	<ul style="list-style-type: none"> • Maple Valley CSA Open House (5/19) – 70 attendees
<ul style="list-style-type: none"> • Skyway-West Hill Technical Advisory Committee (3/13) – 15 attendees 	<ul style="list-style-type: none"> • West Hill/Skyway CSA Open House (5/21) – 35 attendees
<ul style="list-style-type: none"> • Four Creeks/Tiger Mountain CSA (3/18) – 10 attendees 	<ul style="list-style-type: none"> • SE King County/Green Valley CSA Open House (6/2) – 85 attendees
<ul style="list-style-type: none"> • Bear Creek / Sammamish CSA Open House (4/13) – 16 attendees 	<ul style="list-style-type: none"> • Rural Forest Commission (7/9) – 15 attendees
<ul style="list-style-type: none"> • Snoqualmie Valley/NE King County CSA Open House (4/21) – 52 attendees 	<ul style="list-style-type: none"> • Greater Maple Valley UAC (8/24) – 8 attendees
<ul style="list-style-type: none"> • North Highline/White Center CSA Open House (April 23) – 25 attendees 	<ul style="list-style-type: none"> • Agricultural Commission (9/17) – 20 attendees
<ul style="list-style-type: none"> • Vashon-Maury Island CSA Open House (4/28) – 32 attendees 	<ul style="list-style-type: none"> • King County Planning Directors (10/22) – 30 attendees
<ul style="list-style-type: none"> • Fairwood/Renton CSA Open House (5/5) – 55 attendees 	<ul style="list-style-type: none"> • Rural Forest Commission (11/12) – 15 attendees

Approximately 560 residents and stakeholders attended these meetings.

- Stakeholders were informed that comments would be accepted throughout the process, rather than solely during public comment period. That led to a significant amount of early public comments which allowed some issues to be resolved and included in the Public Review Draft.
- Updates to the Comprehensive Plan website to make commenting and joining an e-mail list easier; the email list grew to almost 600 contacts.
- Distributed a series of "eNewsletters" that helped those on the e-mail list remained informed of milestones in the update process. This included every group listed in the Adopting Scope of Work Motion 14351, all the email contacts from the 2012 Comprehensive Plan update list, contacts for community weekly newspapers, contacts provided by the Office of Equity and Social Justice in the Executive's Office, and others.

- Placed advertisements in community papers advertising Community Meetings; six community meetings were held and were attended by almost 300 participants. Meetings were held as follows:

Vashon-Maury Island (Nov. 9) – Ten attendees	Snoqualmie Valley – Bear Creek – Sammamish Area (Dec. 2) – One-hundred ten attendees
Four Creeks – Maple Valley (Nov. 17) – Fifteen attendees	Vashon-Maury Island (follow-up Meeting on Dec. 14) – Forty attendees
West Hill / North Highline/ Urban Annexation Areas (Nov. 19) – Thirty-five attendees	East Cougar Mountain Potential Annexation Area (Jan. 28) – Seventy attendee

- Attended and presented at all of the Community Service Area Open Houses; these meetings allowed the Comprehensive Plan to be presented at high-level to a much wider audience. At these meetings, names were added to the email list.
- Provided a 2-month public comment period between November 6, 2015 and January 6, 2016. This comment period was extended to solicit public comment on an Area Zoning and Land Study that began later in the process, and this comment period went from January 27 to February 3, 2016. During these, nearly 90 comment letters/emails/comment cards were submitted, containing hundreds of individual comments that were used in the development of the draft Plan.

These techniques, some of which are shown in Section V of this report, allowed for an ongoing dialogue with community members.

II. COMMENTS BEFORE RELEASE OF PUBLIC REVIEW DRAFT

A

B

MAX BEERS – POLICY E-497 (RURAL GROUNDWATER PROTECTION AND MONITORING)	
COMMENT	RESPONSES
<p><i>From: Max Beers [mailto:maxbeers@hotmail.com], Rural Water System Protection Committee, Green Valley/Lake Holm Association</i></p> <p><i>Sent: November 5, 2015</i></p> <p>Thanks so much for making this significant change. This should be a great step forward to assist in protecting our rural water supplies. Your rewording of E-497 goes a long way to address our basic concerns as we have expressed to you.</p> <p>Please let us know what we can do further to help ensure these proposed changes are included in the 2016 King County Comprehensive Plan update.</p>	<p>We appreciate the acknowledgement and the Association's early comments to help us craft this policy. Water and Lands Resource Division staff worked collaboratively with Mr. Beers and members of the Green Valley/Lake Holm Association to arrive at the language in Policy E-497.</p>

C

TOM CARPENTER – TRANSPORTATION CONCURRENCY METHODOLOGY	
COMMENT	RESPONSES
<p><i>From: Tom [mailto:TDCarp@comcast.net]</i> <i>Sent: Tuesday, November 17, 2015 10:57 PM</i></p> <p>INITIAL COMMENT</p> <p>I'd like to make it clear that my comments on seams between jurisdictions that included a concurrency example were not critical of the county's TC program. I was a charter member of the TCERP, and served at a time when Roads implemented the Travel Shed approach.</p> <p>I've looked at a few jurisdictions, with a close look at Renton, analyzing their TC programs. Renton is of particular importance because it's PAA on the plateau east of the city is within Travel Shed 12, which is appropriately failing concurrency. Unfortunately, Renton has a TC program that looks at the city holistically; unless the entire city fails, none of it fails. In our opinion, this is very weak, and we've challenged the city on a number of occasions about how permitting in the area is highly problematic.</p> <p>Just want [King County] to know that we have far, far, less concern with the county's approach to TC than we do Renton.</p> <p>There was, however, a proposal that went to the Council TREE Committee, ruled to be significant enough of a change to TC to defer to the comp plan update.</p> <p>The proposal had two parts: 1) was to use urban LOS in unincorporated urban areas, and 2) to move those areas into a separate travel shed. This is one of the topics I'm looking for in the detail of the comp plan PRD.</p> <p>Using an urban LOS in an unincorporated urban area makes sense. However, separating the area into a unique travel shed makes no sense, and actually moves the county away from the travel shed concept. We've been lobbying that the travel sheds be recognized across jurisdictional boundaries.</p> <p>On the Plateau, this would mean that both Renton and the county would recognize the boundary of TS</p>	<p>Comment noted. King County appreciates the time you spent working on the TCERP.</p> <p>After review, these proposals are not included in the Comprehensive Plan update.</p> <p>A policy has been included committing to re-examine the County's transportation concurrency methodology.</p>

TOM CARPENTER – TRANSPORTATION CONCURRENCY METHODOLOGY	
COMMENT	RESPONSES
<p>12, which very appropriately extends to SR 169.</p> <p>FOLLOW-UP COMMENT I'm not sure I see the complicated issues and constraints that [King County] does, but, then I don't have to do the work.</p> <p>For what it's worth, "systems" have capabilities. Capabilities can be measured and managed. Our transportation is a system and therefore has measurable capabilities. Capability maturity models are a common approach to that measurement and management. Almost all CMMs have two key parts: one is focused on management/organizational support and the other is on pervasiveness. Pervasiveness has three levels: unit, integrated, and cross-functional. Unit is simply the number of units (in a business) participating at a quality level. Integrated is focused on the handoffs between units. And cross-functional is end-to-end outcome. If we use music as an analogy, unit is [King County staff] all mastering our individual instruments. Integrated means we tune them to each other. Cross-functional is we play the same music. When an organization (or orchestra) moves from unit to integrated, or from integrated to cross-functional, there is a radical shift in the value produced by the capabilities of the system. We get harmony when integrated. We get music when cross-functional.</p> <p>The seams between jurisdictions, certainly including concurrency, are major inhibitors to a regions ability to manage the capability of systems that cross jurisdictional boundaries.</p> <p>It's a frustrating tragedy (in my experience) to see the potential but hear about issues and constraints. KC Roads can't cause integration and/or harmony (cross-functional) across jurisdictions.</p>	<p>Comments noted.</p> <p>The jurisdictions in the County have not expressed a desire to work together on concurrency integration and King County's authority for concurrency management is limited to the unincorporated area.</p>

D

E

F

G

GREATER MAPLE VALLEY UNINCORPORATED AREA COUNCIL – COMMENTS ON DOCKET SUBMITTALS	
COMMENT	RESPONSES
<p><i>From: Peter Rimbos [mailto:primbos@comcast.net]</i> <i>Sent: Tuesday, September 15, 2015 8:19 AM</i></p> <p>Please accept this as our formal submittal of COMMENTS related to the 2016 KCCP Update’s Docket Items.</p> <p>Docket Item #15 — “Eliminate KCCP policy T-224 which allows the purchase of Transfer of Development Rights to satisfy Transportation Concurrency requirements in the Rural Area.”</p> <p>This is in complete agreement with RECOMMENDATIONS the GMVUAC previously submitted on Transportation Policy T-224. At our August 24 Special Meeting we stated to Ivan we fully support Tom Carpenter’s submittal.</p> <p>Docket Item #16 — “Extend public sewer service into the rural unincorporated area adjacent to the urban growth area to prevent waste water runoff into farmable land and to enable local niche business development.”</p> <p>The GMVUAC strongly opposes this request. Such extension is in direct conflict with the</p>	<p>This request is not reflected in the 2016 Comprehensive Plan. King County believes the current approach, which reduces overall development potential in rural areas by extinguishing development rights through TDR. Edits to the text are included in the 2016 plan to clarify the rationale for this policy.</p> <p>This Docket Request was denied for</p>

GREATER MAPLE VALLEY UNINCORPORATED AREA COUNCIL — COMMENTS ON DOCKET SUBMITTALS	
COMMENT	RESPONSES
<p>following State, Regional, and County policies:</p> <p>State Growth Management Act (GMA): RCW 36.70A.070, etc. Puget Sound Regional Council's (PSRC's) VISION 2040 (pp. 46, 89, 91, etc.) County-Wide Planning Policies (CPP's): DP-51, PF-12, etc.</p> <p>King County Comprehensive Plan (KCCP) Policies: R-326, R-327, R-403, R-508, R-655, F-255, F-264, etc.</p> <p>The request provides no supporting rationale and no background information. This request should be summarily rejected.</p> <p>Thank you.</p> <p>GMVUAC</p>	<p>some of the reasons noted in these comments.</p>

GREATER MAPLE VALLEY UNINCORPORATED AREA COUNCIL – MAPLE VALLEY AREA STUDY	
COMMENT	RESPONSES
<p><i>From: Peter Rimbo [mailto:primbos@comcast.net]</i> <i>Sent: Thursday, August 27, 2015 9:57 AM</i></p> <p style="text-align: center;">SITUATION</p> <p>The May 11 KC Council-approved “Scope of Work” for the 2016 KCCP Update included an additional item on the Area Zoning and Land-Use Proposals list directing the KC Executive to look at the Cedar Hills/Maple Valley area in conjunction with long-term planning for the Cedar Hills Landfill (GMVUAC emphases):</p> <p>Cedar Hills/Maple Valley:</p> <ol style="list-style-type: none"> a. Initiate a subarea plan for the "Cedar Hills/Maple Valley" area. b. Review land use designations and implementing zoning on parcels 2823069009, 2923069019, 2923069080, 2923069082, 2923069083, 2923069084, 3223069001, 3223069003, 3223069068, 3323069027, 3323069030, and 3323069042 <u>and the surrounding area</u>, which has long-standing industrial and resource material processing uses. c. Study and make recommendations on the <u>potential long-term land uses for this area</u>, including coordination with the County's planning on future closure of the adjacent Cedar Hills landfill. d. Evaluate options for land uses other than mining, including <u>residential uses, non-residential uses, and whether a four-to-one proposal is appropriate for this area.</u> <p>This boils down to: Prepare a Subarea Plan that evaluates and recommends potential long-term land uses, which could include a 4:1 scenario.</p> <p style="text-align: center;">BACKGROUND</p> <p>Subarea planning is governed by KC Code Title 20.08 -- PLANNING (our emphases):</p> <p>Title 20.08.060 -- Subarea plan. "Subarea plan" means detailed local land use plan which implements and is an element of the comprehensive plan containing specific policies, guidelines and criteria adopted by the council to guide development and capital improvement decisions within specific subareas of the county. The subareas of the county shall consist of distinct communities, specific geographic areas or other types of districts having unified interests or similar characteristics</p>	<p>This study has been included in the Community Service Area Planning Scheduled (noted in Chapter 11) for review in the future. These comments should be shared again as part of that future planning process.</p>

GREATER MAPLE VALLEY UNINCORPORATED AREA COUNCIL – MAPLE VALLEY AREA STUDY	
COMMENT	RESPONSES
<p><i>within the county. Subarea plans may include: community plans, which have been prepared for large unincorporated areas; potential annexation area plans, which have been prepared for urban areas that are designated for future annexation to a city; neighborhood plans, which have been prepared for small unincorporated areas; and plans addressing multiple areas having common interests. The relationship between the 1994 King County Comprehensive Plan and subarea plans is established by K.C.C. 20.12.015.(Ord. 13147 § 5, 1998: Ord. 11653 § 3, 1995: Ord. 3669 § 2, 1978: Ord. 263 Art. 1 (part), 1969).</i></p> <p>We assume the Subarea Plan contemplated falls under the item: “<i>neighborhood plans, which have been prepared for small unincorporated areas.</i>”</p> <p style="text-align: center;">INTERESTS</p> <p>The Subarea Plan contemplated here is of great interest to us for several reasons:</p> <p>1. DEMONSTRATION PROJECT</p> <p>We have not found any “Demonstration Projects,” “Pilot Projects,” or “Project Overlays” that make sense in light of King County policies for the Rural Area (e.g., KCCP Chapter 1--REGIONAL PLANNING: “...to preserve the Rural Area, conserve the natural environment and designate resource lands for long-term agriculture and forest production;” “Protect Rural, Resource and ecologically fragile areas for future generations by maintaining low residential densities in the Rural Area and in areas containing regionally and nationally important ecosystems for fish and wildlife and by recognizing that resource lands, such as farms and forests, provide economic, social and environmental benefits;” “RP-101 -- King County shall strive to provide a high quality of life for all of its residents by working with cities, special purpose districts and residents to develop attractive, safe and accessible urban communities, retain rural character and rural neighborhoods, support economic development, maintain resource lands preserve the natural environment, and to protect significant cultural and historic resources;” etc.). “Demonstration Projects” appear to be a way of circumventing all the rules (some good, some bad) King County imposes on everybody else.</p> <p>2. REGIONAL VIEW</p> <p>We consider this issue “Regional,” and, thus, of importance to all UACs. There is very little infrastructure in the area surrounding and including the Cedar Hills Landfill, Cedar Grove Compost, and Stoneway operation to support a “Demonstration Project.” Consequently, “<i>if you can do it here, you can do it anywhere.</i>”</p>	

GREATER MAPLE VALLEY UNINCORPORATED AREA COUNCIL – MAPLE VALLEY AREA STUDY	
COMMENT	RESPONSES
<p>Should King County seek a way to maximize the potential return on its property, it will undoubtedly include rezoning surrounding industrial properties. However, several problems arise as the new uses that might be contemplated would require infrastructure, which is currently near non-existent in the area, and the current population density is too low to support some potential uses envisioned to make it attract investors/developers.</p> <p>3. PROXIMITY</p> <p>The area to be subject to Subarea Planning is directly adjacent to our GMVUAC territory and, thus, will directly and indirectly affect our constituents.</p> <p style="text-align: center;"><u>CONCERNS</u></p> <p><i>We consider this issue to be multifaceted:</i></p> <ol style="list-style-type: none"> 1. <i>It's a Growth Management issue due to potential rezoning changes and land-use designation changes.</i> 2. <i>It's a Transportation issue, because quite a bit of transportation infrastructure would need to be added to make any Commercial/Residential plan palatable.</i> 3. <i>It's an Environmental issue due to all the cleanup that would first have to be done due to the long-term dumping and use of toxic chemicals, solvents, oil, etc. at multiple sites including the Queen City Farms Superfund site.</i> 4. <i>It's an Economic issue as a commercial component possibly is contemplated.</i> <p><i>With the King County Unincorporated Area tax base slowly disappearing due to annexations and the structure of the State's tax system (an ongoing, and apparently long term trend), we are concerned King County has substantial incentive to cooperate with resource extractors in both the mining and forestry sectors to convert "under-taxed" properties into potentially higher tax categories.</i></p> <p style="text-align: center;"><u>RECOMMENDATIONS</u></p> <p><i>We recommend the Subarea Planning exercise to be described in the KCCP Update Public Review Draft (PRD) strictly adhere to the State's Growth Management Act, Countywide Planning Policies, and Comprehensive Plan itself. When it comes to proposing "Demonstration Projects," from the Rural Area citizens' perspective, we expect the County to adhere to these laws and policies, as well as its own Code</i></p>	

GREATER MAPLE VALLEY UNINCORPORATED AREA COUNCIL – MAPLE VALLEY AREA STUDY	
COMMENT	RESPONSES
<p><i>as stipulated under Title 21A.55 -- DEMONSTRATION PROJECTS:</i></p> <p>Title 21A.55.010 Purpose. <i>Purpose. The purpose of this section is to provide for "demonstration projects" as a mechanism to test and evaluate alternative development standards and processes prior to amending King County policies and regulations. Alternative development standards might include standards affecting building and/or site design requirements. Alternative processes might include permit review prioritization, alternative review and revision scheduling, or staff and peer review practices. All demonstration projects shall have broad public benefit through the testing of new development regulations and shall not be used solely to benefit individual property owners seeking relief from King County development standards. A demonstration project shall be designated by the Metropolitan King County Council. Designation of each new demonstration project shall occur through an ordinance which amends this code and shall include provisions that prescribe the purpose(s) and location(s) of the demonstration project. Demonstration projects shall be located in urban and/or rural areas which are deemed most suitable for the testing of the proposed alternative development regulations. Within such areas development proposals may be undertaken to test the efficacy of alternative regulations that are proposed to facilitate increased quality of development and/or increased efficiency in the development review processes. (Ord. 12627 § 1, 1997).</i></p> <p>While the given purpose of “Demonstration Projects” in the above is to: “evaluate alternative development standards and processes prior to amending King County policies and regulations” and “test the efficacy of alternative regulations that are proposed to facilitate increased quality of development and/or increased efficiency in the development review processes;” such projects still must adhere to:</p> <p>Title 21A.55.030 Demonstration project - general provisions. B. <i>Demonstration projects must be consistent with the King County Comprehensive Plan. Designation of a demonstration project and its provisions to waive or modify development standards must not require nor result in amendment of the comprehensive plan nor the comprehensive land use map.</i></p> <p>We expect the PRD to adhere to these stipulations in framing the contours of the Subarea Plan contemplated.</p>	

GREATER MAPLE VALLEY UNINCORPORATED AREA COUNCIL – MULTIPLE TOPICS	
COMMENT	RESPONSES
<p><i>From: Peter Rimbos [mailto:primbos@comcast.net]</i> <i>Sent: Thursday, August 27, 2015 9:57 AM</i></p> <p>CHAPTER 2</p> <p>Urban Separators and the Four-to-One Program</p> <p>U-185 Through the Four-to-One Program, King County shall actively pursue dedication of open space along the original Urban Growth Area line adopted in the 1994 King County Comprehensive Plan. Through this program, one acre of Rural Area land may be added to the Urban Growth Area in exchange for a dedication to King County of four acres of permanent open space. Land added to the Urban Growth Area for naturally appearing drainage facilities in support of its development does not require dedication of permanent open space.</p> <p><u>QUESTIONS:</u></p> <p><i>1. Besides the Open Space gain, why allow Rural Area acreage to be annexed into the UGA when it is not part of a recognized Potential Annexation Area (PAA)?</i></p> <p><i>2. Please explain the rationale for the last sentence regarding “naturally appearing drainage facilities” and what the definition is thereof?</i></p> <p>U-189 Land added to the Urban Growth Area under the Four-to-One Program shall have a minimum density of four dwellings per acre and shall be physically contiguous to the original Urban Growth Area, unless there are limitations due to the presence of critical areas, and shall be able to be served by sewers and other efficient urban services and facilities; provided that such sewer and other urban services and facilities shall be provided directly from the urban area and shall not cross the open space or rural area. Drainage facilities to support the urban development shall be located within the urban portion of the development. In some cases, lands must meet affordable housing requirements under this program. The total area added to the Urban Growth Area as a result of this policy shall not exceed 4,000 acres.</p> <p><u>QUESTION: 4,000-ac is a large amount of land to be annexed from the Rural Area into the UGA--is it a total or an annual limitation?</u></p>	<p>King County appreciates the time and effort the Greater Maple Valley UAC has put into working on the Comprehensive Plan in this and previous cycles. The early input in the 2016 cycle was very helpful in developing the Public Review Draft.</p> <p>The origin of this provision is unclear, but the rationale may have been that Stormwater facilities such as ponds, engineered wetlands, or LID facilities take up significant area but provide water quality, flow control, or habitat benefits and thus should not count toward the 4/1 calculation. The language has also been clarified in the 2016 update.</p> <p>There is not an annual limit. Based on analysis by Council staff, just over 1000 total acres have been added.</p>

GREATER MAPLE VALLEY UNINCORPORATED AREA COUNCIL – MULTIPLE TOPICS	
COMMENT	RESPONSES
<p>II. Potential Annexation Areas</p> <p>U-207 King County shall work with cities to develop pre-annexation agreements to address the transition of services from the county to the annexing cities. The development of such agreements should include a public outreach process to include but not be limited to residents and property owners in the PAAs, as well as residents and property owners in the surrounding areas. Pre-annexation agreements may address a range of considerations, including but not limited to:</p> <p>e. Establishing a financing partnership between the county, city and other service providers to address needed infrastructure;</p> <p><i>Bonded Debt: State law (RCWs 35.13.110; 35.13.270, and 35A.14.801) is rigid here.</i></p> <p><i>RECOMMENDATION: Revisit State law (RCWs 35.13.110; 35.13.270, and 35A.14.801) so that Counties and Cities have the opportunity to “negotiate” any transfer of bonded debt incurred within the annexed area. Approval of County bonded debt could be similar to how cities do so upon annexation by offering a vote to the annexing residents and allow the county to require a disapproval of the annexation should residents vote against the bonded debt continuance.</i></p>	<p>Comments noted; see the Workplan section of Chapter 12. It includes a workplan to revisit the Annexation Areas Map and Countywide Planning Policies. This type of analysis may be an important part of this future work.</p>
<p>CHAPTER 3</p> <p>A. Rural Legacy and Communities</p> <p>R-101 King County will continue to preserve and sustain its rural legacy and communities through programs and partnerships that support, preserve, and sustain its historic, cultural, ecological, agricultural, forestry, and mining heritage through collaboration with local and regional preservation and heritage programs, and other interested stakeholders.</p> <p><i>RECOMMENDATION: Add the following to the end of the last sentence: “--unincorporated area councils, community organizations, rural residents, and rural business owners, including forest and farm owners, and rural communities, towns, and cities”</i></p> <p>II. Rural Designation</p>	<p>Language added to policy.</p>

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<p>A. Rural Area Designation Criteria</p> <p>R-201 It is a fundamental objective of the King County Comprehensive Plan to maintain the character of its designated Rural Area. The GMA specifies the rural element of comprehensive plans include measures that apply to rural development and protect the rural character of the area (RCW 36.70A.070(5)). The GMA defines rural character as it relates to land use and development patterns (RCW 36.70A.030(15)). This definition can be found in the Glossary of this Plan. Rural development can consist of a variety of uses that are consistent with the preservation of rural character and the requirements of the rural element. In order to implement GMA, it is necessary to define the development patterns that are considered rural, historical or traditional and do not encourage urban growth or create pressure for urban facilities and service. Therefore, King County’s land use regulations and development standards shall protect and enhance the following components of the Rural Area:</p> <ul style="list-style-type: none"> a. The natural environment, particularly as evidenced by the health of wildlife and fisheries (especially salmon and trout), aquifers used for potable water, surface water bodies including Puget Sound and natural drainage systems and their riparian corridors; b. Commercial and noncommercial farming, forestry, fisheries, mining and cottage industries; c. Historic resources, historical character and continuity, including archaeological and cultural sites important to tribes; <p><i>RECOMMENDATION: Replace from “Therefore, King County...” through “...important to tribes” with:</i></p> <p><i>“Therefore, King County’s land use regulations and development standards shall be designed, intended and applied to appropriately protect and enhance family farms, forestry, fisheries, mining, home occupations, and cottage industries suitable for the Rural Area; and in so doing, State water quality standards for both surface water and ground water, including environmentally sensitive areas ordinances, will be observed and reasonably enforced to protect and enhance the natural environment, wildlife, fisheries, and aquifers used for potable water. Furthermore, land use regulations and development standards will</i></p>	<p>Policy revised.</p>	

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<p><i>protect and enhance archaeological and cultural sites important to tribes, as well as historic resources, historical character and continuity important to neighborhood groups. Land use regulations and development standards will not be designed, intended or applied to deny residents of the Rural Area, or in any manner or way diminish, the attributes and enjoyment associated with a rural lifestyle.”</i></p> <ul style="list-style-type: none"> d. Community small-town atmosphere, safety, and locally owned small businesses; e. Economically and fiscally healthy Rural Towns and Rural Neighborhood Commercial Centers with clearly defined identities compatible with adjacent rural, agricultural, forestry and mining uses; f. Regionally significant parks, trails and open space; g. A variety of low-density housing choices compatible with adjacent farming, forestry and mining and not needing urban facilities and services; and h. Traditional rural land uses of a size and scale that blend with historic rural development. <p><u>CONCERN: Siting of Urban facilities in the Rural Area: Policies must be strengthened to forbid siting and approval of urban or largely urban-serving facilities in Unincorporated or Rural Areas. As an example, the following King County Code should be amended:</u></p> <p><u>KCC 21A.08.060 A. Government/business services land uses, under “Specific Land Use” – “Utility Facility” by adding Note #38 as a Development Condition to all Zoning Designations.</u></p> <p><u>Note #38: Utility Facilities consisting of regional surface water flow control and water quality facilities that are proposed to be wholly located within a Resource or Rural-designated area and associated in whole or in part with an existing or new proposed private residential development that is located wholly within an Urban-designated area are prohibited. Where such conditions are proposed for a new facility or where substantial facility or service area modifications to an existing regional surface water flow control and water quality facility are proposed, the requirements under Note #8 shall apply to Utility</u></p>	<p>This policy has been revised to address this issue.</p>

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<p style="text-align: center;"><i>Facilities.</i></p> <p><i>RECOMMENDATION: Add item “i” to R-201 as follows:</i> <i>“i. Rural uses not including urban or largely urban-serving facilities.”</i></p> <p style="text-align: center;">III. Rural Densities and Development</p> <p>B. Residential Densities</p> <p>R-304 Rural area residential densities shall be applied in accordance with R-305 – R-309. Individual zone reclassifications are discouraged and should not be allowed in the Rural Area. Property owners seeking individual zone reclassifications should demonstrate compliance with R-305 – R-309.</p> <p><i>QUESTION: What is an “individual zone reclassification”?</i></p> <p>R-309 The RA-2.5 zone has generally been applied to rural areas with an existing pattern of lots below five acres in size that were created prior to the adoption of the 1994 Comprehensive Plan. These smaller lots may still be developed individually or combined, provided that applicable standards for sewage disposal, environmental protection, water supply, roads and rural fire protection can be met. A subdivision at a density of one home per 2.5 acres shall only be permitted through the transfer of development rights from property in the designated Rural Forest Focus Areas. The site receiving the density must be approved as a Transfer of Development Rights receiving site in accordance with the King County Code. Properties on Vashon-Maury Islands shall not be eligible as receiving sites.</p> <p><i>In order to make it perfectly clear that R-309 pertains only to RA-2.5-zoned properties, the following should be added to the beginning of the third sentence: “In the RA-2.5 zone...”</i></p> <p><i>QUESTION ASKED OF KAREN WOLF (3/31/15):</i></p> <p><i>1. Why is KC approving <u>new</u> RA-2.5 subdivision zoning in the Rural Area and why are such “subdivisions” allowed RA-2.5 zoning through a 5:1 TDR agreement from the “Rural Forest Focus Areas” (KCCP definition: “Rural Forest Focus Areas are identified geographic areas where special efforts are necessary and feasible to maintain forest cover and the practice of sustainable forestry. King County shall target funding, when available, new economic incentive programs, regulatory actions, and additional technical assistance to the</i></p>	<p>This refers to a rezoning of an individual property.</p> <p>The text preceding this policy has been revised to address this issue.</p>	

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<p><i>identified Rural Forest Focus Areas. Strategies specific to each Rural Forest Focus Area shall be developed, employing the combination of incentive and technical assistance programs best suited to each focus area.”)?</i></p> <p><u>ANSWER FROM KAREN WOLF (4/1/15):</u></p> <p><i>1. “Long, long history to this policy. This has evolved over many years. The Rural Area originally had two zones: RA-5 & RA-10. But, since the Rural Area was created after much platting had been done, there were lots smaller than 5 acres. Consequently, you could have a subdivision with some 2.5 acre lots and 5 acre lots mixed together. In order to allow the 5-acre lots to be split similar to the neighboring lots, the Council created the RA-2.5 zone. At first, subdividing down to 2.5 acre lots was only allowed if the lot was surrounded on 3 sides by lots of 2.5 acres or smaller. As you can imagine, this difficult to implement and became known as the “3-sided” provision. Over the years, us planners on the Executive side have tried to eliminate the 2.5 acre zone altogether. This had proven to be extremely difficult, as you can imagine. We were finally to get a tightening up of the 2.5 acre zone either in the 2008 or 2012 plan (can’t quite remember which one.) Now, you can only subdivide down to 2.5 acre lots if and only if TDRs are purchased from a Rural Forest Focus Area.”</i></p> <p><u>CONCERNS:</u> <i>We still have two major concerns:</i></p> <p><i>1. Allowing such 2.5 zoning perpetuates existing traffic flow issues, consequently, identifying a viable plan to address the traffic issue should be part of any subdivision adjustment, not just TDR agreements. To address Transportation Concurrency we recommend the language be changed to require all the TDRs to not only be purchased from the Rural Area, but also from the same Travel Shed. To do this, we recommend the following be added to the end of the third sentence: “...within the same Travel Shed.”</i></p> <p><i>2. That said, Rural Area properties should <u>not</u> serve as receiving sites for any TDRs.</i></p> <p><u>RECOMMENDATION:</u> <i>The third sentence in R-309 should be modified as follows:</i></p>	<p>According to staff at the Department of Permitting and Environmental Review, no new RA-2.5 zoning has been created since their initial establishment in 1994.</p>

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<p><i>“In the RA-2.5 zone aA subdivision at a density of one home per 2.5 acres shall only be permitted through the transfer of development rights from property in the designated Rural Forest Focus Areas <u>within the same Travel Shed.</u>”</i></p> <p>C. Transfer of Development Rights Program</p> <p>R-315 To promote transfers of development rights, King County shall:</p> <ul style="list-style-type: none"> a. Facilitate transfers from private property owners with sending sites to property owners with receiving sites; b. Operate the King County TDR Bank to facilitate the TDR market and bridge the time gap between willing sellers and buyers of TDRs through buying, holding, and selling transferable development rights; <p><i>The County should provide the Public with access to maps showing all TDR-banked properties--both sending and receiving sites.</i></p> <p><i>RECOMMENDATION: Add a second sentence to R-314 b. as follows:</i></p> <p><i>“Maps showing all TDR-banked properties--both sending and receiving sites--shall be updated semiannually and made available to the Public.”</i></p> <ul style="list-style-type: none"> c. Work with cities to develop interlocal agreements that encourage transfers of development rights from Rural and Resource lands into cities; d. Work with cities regarding annexation areas where TDRs are likely to be used; e. Work with communities and seek funding and other means to provide public amenities to enhance the livability of incorporated and unincorporated area neighborhoods accepting increased densities through TDR; and f. Work with the Washington State Department of Commerce, PSRC, and King County cities to implement Washington State Regional TDR legislation. <p>1. Sending and Receiving Sites</p> <p>R-317 For transfer of development rights purposes only, qualified sending sites are allocated development rights as follows:</p> <ul style="list-style-type: none"> a. Sending sites with Rural Area or Agricultural zoning shall be allocated one TDR for every five acres of gross land area; b. Sending sites with Forest zoning shall be allocated one TDR for every 	<p>See comment above. The portion of the policy related to “within the same travel shed” has not been included as it would preclude the use of this tool on the existing, legal lots.</p> <p>The Department of Natural Resources and Parks tracks all sending and receiving sites for TDR credits. Maps are updated continuously, and are available to the public through DNRP’s website. King County does not believe that this language is necessary.</p>	

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<p>eighty acres of gross land area;</p> <p>c. Sending sites with Urban Separator land use designation shall be allocated four TDRs for every one acre of gross land area;</p> <p>d. If a sending site has an existing dwelling or retains one or more development rights for future use, the gross acreage shall be reduced in accordance with the site’s zoning base density for the purposes of TDR allocation; and</p> <p>e. King County shall provide bonus TDRs to sending sites in the Rural Area as follows:</p> <ol style="list-style-type: none"> 1. The sending site is a vacant RA zoned property and is no larger than one-half the size requirement of the base density for the zone; and 2. The sending site is a RA zoned property and is located on a shoreline of the state and has a shoreline designation of conservancy or natural. <p><u>QUESTIONS:</u></p> <ol style="list-style-type: none"> 1. <i>How is R-317 consistent with R-309 above?</i> 2. <i>What about Rural Area receiving sites--there is no mention?</i> 3. <i>What about Rural Forest Focus Areas--there is no mention--how many TDRs are required?</i> <p>2. Rural and Resource Land Preservation TDR Program</p> <p>R-323 The Rural and Resource Land Preservation TDR Program shall include, but is not limited to, the following:</p> <ol style="list-style-type: none"> a. In addition to the density that is allowed on a receiving site in the urban growth area from the purchase of TDRs, the county shall evaluate the climate change benefits achieved by reducing transportation related greenhouse gas emissions that result from the transfer of development rights from the sending site, provided that such consideration is not precluded by administrative rules promulgated by the state; b. In order to satisfy transportation concurrency requirements in the Rural Area in a transportation concurrency travel shed that is non-concurrent, a development proposal for a short subdivision creating up to four lots may purchase TDRs from other Rural Area properties in the same travel shed, 	<p>As noted previously, no new RA-2.5 zoning has been created since 1994 so the reference to R-309 is moot.</p> <p>R-317 discusses potential <i>sending</i> areas and R-309 discusses RA 2.5 zoned areas as potential <i>receiving</i> areas. In some cases an RA zoned property could qualify <i>either</i> as a sending site or receiving site. Rural Area TDR receiving sites are discussed further in the answer below.</p> <p>There are very few cases in which rural zoned properties can be TDR receiving areas since the overarching policy intent is to steer new growth away from rural areas and into urban areas. Allowed uses of TDRs at Rural Area receiving sites include:</p> <p>To realize 1 du/2.5 ac in RA 2.5 zones (TDRs have been used this way twice);</p> <p>To increase the size of an allowed Accessory Dwelling Unit from 1000sf to 1500sf. (TDRs have been used this way four times);</p> <p>To allow a detached ADU (rather than only and attached ADU) on certain size RA-5 properties; and</p> <p>To satisfy traffic concurrency requirements for subdivisions in rural zones of failing travelsheds. (TDRs have never been used for this purpose.)uses of The inclusion of Rural TDR</p>	

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<p>or from the TDR Bank from credits from Rural Area properties in the same travel shed. The transfer shall not result in an increase in allowable density on the receiving site. A short subdivision creating two lots where the property has been owned by the applicant for five or more years and where the property has not been subdivided in the last ten years shall satisfy the transportation concurrency requirements without having to purchase TDRs;</p> <p><i>QUESTION: Why is such a “short subdivision.” which will generate more traffic, <u>not</u> required to purchase TDRs to satisfy transportation concurrency requirements?</i></p> <p>c. King County shall provide an added density bonus of up to a 100% increase above the base density allowed in K.C. Code 21A.12.030, when TDRs are used for projects within any designated commercial center or activity center within the Urban Growth Area that provides enhanced walkability design and incorporates transit oriented development;</p> <p><i>QUESTION: This “added density bonus” does not any affect on the TDR Bank and, thus no affect on the sending site?</i></p> <p>d. King County may allow accessory dwelling units in the Rural Area that are greater than one thousand square feet, but less than 1,500 square feet, if the property owner purchases one TDR from the Rural Area; and</p> <p>e. King County may allow a detached accessory dwelling unit on a RA-5 zoned lot that is two and one-half acres or greater and less than three and three-quarters acres if the property owner purchases one TDR from the Rural Area.</p> <p>D. Nonresidential Uses</p> <p>R-326 Except as provided in R-327:</p> <p>a. New schools and institutions primarily serving rural residents shall be located in neighboring cities and rural towns;</p> <p>b. New schools, institutions, and other community facilities primarily serving urban residents shall be located within the UGA; and</p> <p>c. New community facilities and services that primarily serve rural residents shall be located in neighboring cities and rural towns, with limited exceptions when their use is dependent on a rural location and their size</p>	<p>How many TDRs result from a particular sending site is sometimes called the “allocation ratio.” The allocation ratio for RFFA sending sites is the same as allocation ratios for other RA zones (1 TDR per 5 ac in RA-5 or RA-10 zones or 1 TDR/2.5 ac in the RA-2.5 zone).</p> <p>As for how TDRs originating from the RFFA can be used...for RA-2.5 zoned properties to realize density of one dwelling unit per 2.5ac (base density is 1du/5ac), one TDR must be purchased from an RFFA sending site for each new lot created in a subdivision in the RA-2.5 zone.</p> <p>The removal of this provision (transportation concurrency and TDRs) is not reflected in the 2016 Comprehensive Plan. King County believes the current approach, which reduces overall development potential in rural areas by extinguishing development rights through TDR. Edits to the text are included in the 2016 plan to clarify the rationale for this policy.</p> <p>Correct. Once TDRs are transferred away from a sending site, they are effectively “decoupled” from that sending site and how they are used or how much bonus density results does not affect the sending site from which they originated. How many units or square feet of additional density a TDR translates to at a receiving site sometimes referred to as the “transfer ratio.” This ratio is establish</p>	

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<p>and scale supports rural character.</p> <p><u>CONCERN:</u> See comments under R-201.</p> <p><u>RECOMMENDATION:</u> Add item “d” to R-326 as follows:</p> <p><i>“d. New stormwater facilities primarily serving urban needs shall be located within the UGA.”</i></p> <p>E. Character/Development Standards</p> <p>R-334 To maintain traditional rural development patterns and assure continued opportunities for resource activities in the Rural Area, large lot development is preferred in the Rural Area. Clustering of lots is permitted when:</p> <ol style="list-style-type: none"> a. The development provides equal or greater protection of the natural environment, natural resource lands, historic resources or archaeological sites; b. Clusters are limited in size to be compatible with surrounding large lots or nearby agricultural and forestry uses; c. The clustered development is offset with a permanent resource land tract preserved for forestry or agriculture, as designated by the owner at time of subdivision or short subdivision, or a permanent open space tract. Under no circumstances shall the tract be reserved for future development; and d. The development can be served by rural facility and service levels (such as on-site sewage disposal and rural fire protection). <p><u>RECOMMENDATION:</u> Add to the parenthetical expression in item “d” the following:</p> <p><i>“private well(s) for on-site water supply”</i></p> <p>R-336 King County shall continue to support the rural development standards that have been established to protect the natural environment by addressing seasonal and maximum clearing limits, impervious surface limits, surface water management standards that emphasize preservation of natural drainage systems and water quality, groundwater protection, and resource-based practices. These standards should be designed to provide appropriate exceptions for lands that are to be developed for kindergarten through twelfth grade public schools and school facilities, provided that the school project shall comply at a minimum with the requirements of the King County Surface Water</p>	<p>based on policy goals, as in the case above where the transfer ratio can be increased to further incentivize projects in highly urbanized areas with walkable design and easy access to transit. How many TDRs result from a particular sending site is sometimes called the “allocation ratio,” which can also be adjusted based on conservation policy goals (e.g. to offer greater incentive for enrolling certain types of conservation land), but are not typically adjusted based on the amount or nature of development at receiving sites.</p> <p>This policy (R-326) reflects extensive work by the School Siting Task Force and no edits are proposed in the 2016 plan.</p> <p>The 2016 Plan has been revised to include this language.</p>	

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<p>Design Manual.</p> <p><i>Rural Area design standards (e.g., KCC Title 21A.16--DEVELOPMENT STANDARDS - LANDSCAPING AND WATER USE) could be cited here, as well as any specific design standard manuals, etc.</i></p> <p><i>RECOMMENDATION: Add specific King County Code Title cites, as appropriate.</i></p> <p style="text-align: center;">V. Rural Commercial Centers</p> <p>C. Cities in the Rural Area</p> <p>R-510 The cities in the rural area and their Potential Annexation Areas are part of the overall Urban Growth Area for purposes of planning land uses and facility needs. King County should work with cities in the rural area to encourage the provision of affordable housing, to minimize the impacts of new development on the surrounding rural land and to plan for growth consistent with long-term protection of significant historic resources, the surrounding Rural Area and Resource Lands.</p> <p><i>CONCERN: King County has little to no power to influence development in Cities located within the Rural Area or substantially surrounded by the Rural Area (case in point: Black Diamond). Because of this, how does the County intend to “minimize the impacts of new development on the surrounding rural land...”?</i></p> <p>D. Non-Resource Industrial Uses and Development Standards in the Rural Area</p> <p>R-512 The creation of new Industrial-zoned lands in the Rural Area shall be limited to those that have long been used for industrial purposes, do not have potential for conversion to residential use due to a historic designation and that may be accessed directly from SR-169.</p> <p><i>QUESTION: How is this consistent with the proposed “Demonstration Project” at Pacific Raceways? If the land is in the Rural Area and not zoned “Industrial,” then this policy should preclude consideration of such a “Demonstration Project.”</i></p> <p>R-514 Development regulations for new industrial development in the Rural Area shall require the following:</p> <p>a. Greater setbacks, and reduced building height, floor/lot ratios, and maximum impervious surface percentage standards in comparison to</p>	<p>Comment noted; some additional cross-referencing and citations are added in the 2016 Plan.</p> <p>This policy describes intent.</p> <p>Comment noted. The County Council has determined that marijuana processing facilities are appropriate in industrial areas. The permit for this particular site is legal, vested and complies with the King County Code as adopted by the Council.</p>	

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<p>standards for urban industrial development;</p> <ul style="list-style-type: none"> b. Maximum protection of sensitive natural features, especially salmonid habitat and water quality; c. Building and landscape design that respects the aesthetic qualities and character of the Rural Area, and provides substantial buffering from the adjoining uses and scenic vistas; d. Building colors and materials that are muted, signs that are not internally illuminated, and site and building lighting that is held to the minimum necessary for safety; e. Heavier industrial uses, new industrial uses producing substantial waste byproducts or wastewater discharge, or new paper, chemical and allied products manufacturing uses in the urban industrial zone shall be prohibited; and f. Industrial uses requiring substantial investments in infrastructure such as water, sewers or transportation facilities shall be scaled to avoid the need for public funding of the infrastructure. <p><i>CONCERN: Industrial uses that include newly generated heavy-gross-weight truck traffic should require specific mitigation for road repairs. Although such vehicles pay taxes on a gross weight basis, most, if not all, of that tax money goes to the State and then only a small portion finds its way back to the County, thus there are many County roads that suffer undue heavy-gross-weight truck damage that cannot be repaired (if at all) in a timely matter.</i></p> <p>VI. Resource Lands</p> <p><i>CONCERN: This section does not address resource-based businesses in unincorporated areas, such as Marijuana production, processing and retail uses. Policies should preclude siting of Marijuana production, processing, and retail uses in residential areas in the Rural Area. SEPA reviews should ensure the particular issues associated with such businesses, such as Public Safety, are included and fully addressed. An excellent example in the Rural Area is the proposed Marijuana Processing Facility at the end of 200th Ave SE, a narrow (18 ft at its worst), unshouldered one-lane country road that is bordered by residences on both sides. The Commercial Site Development Permit Application already was found complete by</i></p>	<p>Policy revised to address this issue.</p>	

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<p><i>KC DPER and the KC PAO has provided an opinion that all future permit applications are fully vested. The GMVUAC discussed this issue with Deputy KC Executive Fred Jarrett at its May 19 CSA Meeting and he requested full documentation, which the GMVUAC provided to Mr. Jarrett, DPER Director John Starbard, and the KC Ombudsman Office.</i></p> <p>B. Resource Conservation Strategy</p> <p>R-607 Land uses, utilities and transportation facilities adjacent to Designated Agricultural and Forest Production Districts and Designated Mineral Resource Sites, shall be sited and designed to ensure compatibility with resource management.</p> <p><i>CONCERN: Such “compatibility” is nigh impossible when such designated Districts or Sites are adjacent or in near proximity to Cities. Case in point: the Green Valley Agricultural Production District adjacent to the soon-to-quintuple-in-population City of Black Diamond.</i></p> <p>R-611 King County should develop and employ effective means to inform affected property owners about nearby resource management activities. This may include, but not be limited to:</p> <p>a. Notice on title for properties within five hundred feet of designated agriculture, forestry, and mineral resource lands;</p> <p><i>CONCERN: “Five hundred feet” is wholly inadequate for resource management activities--case in point: the Quality Aggregates operation near Lake Francis. A square 5-ac parcel is less than 500 ft on a side, such that the parcel adjacent to it on the other side could receive <u>no</u> notification at all. In all such cases KC Code 20.20.060(H): “Mailed notice for a proposal shall be sent by the department within fourteen days after the department’s determination of completeness: 1. By first class mail to owners of record of property in an area within five hundred feet of the site. <u>The area shall be expanded when the department determines it is necessary to send mailed notices to at least twenty different property owners.</u>” (underlined added.) We believe even twenty is insufficient in many regions of the Rural Area.</i></p> <p><i>RECOMMENDATION: Modify Policy R-611a. to read: “Notice on title for properties within <u>one thousand five hundred</u> feet of designated agriculture, forestry, and mineral resource lands <u>or the surrounding fifty (50) distinct</u></i></p>	<p>Comment noted. The County Council has determined that marijuana processing facilities are appropriate in industrial areas. The permit for this particular site is legal, vested and complies with the King County Code as adopted by the Council.</p> <p>Comment noted. This policy describes intent in how the County will manage its own practices and how it will approach working with cities.</p> <p>This policy has been revised to include the current code standard; note that this requires that a minimum of 20 property owners are notified.</p>	

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<p><i><u>property owners, whichever is greater;</u></i></p> <ul style="list-style-type: none"> b. Signage; and c. Community meetings and other public notification tools. <p>2. Promoting Forest Management <u>QUESTION: Why is there no discussion of “Rural Forest Focus Areas”?</u></p> <p>D. Agriculture 1. Protecting Agricultural Lands</p> <p>R-652 King County commits to preserve APD parcels in or near the Urban Growth Area because of their high production capabilities, their proximity to markets, and their value as open space. King County should work with cities adjacent to or near APDs to minimize the operational and environmental impacts of urban development on farming, and to promote activities and infrastructure, such as farmers’ markets and agriculture processing businesses, that benefit both the cities and the farms by improving access to locally grown agricultural products.</p> <p><u>QUESTION: What “local services” does King County contract for with cities?</u></p> <p>R-655 Public services and utilities within and adjacent to APDs shall be designed to minimize significant adverse impacts on agriculture and to maintain total farmland acreage and the area’s historic agricultural character:</p> <ul style="list-style-type: none"> a. Whenever feasible, water lines, sewer lines and other public facilities should avoid crossing APDs. Installation should be timed to minimize negative impacts on seasonal agricultural practices; b. Road projects planned for the APDs, including additional roads or the widening of roads, should be limited to those that are needed for safety or infrastructure preservation and that benefit agricultural uses. Where possible, arterials should be routed around the APDs. Roads that cross APDs should be aligned, designed, signed and maintained to minimize negative impacts on agriculture, and to support farm traffic; and <p><u>CONCERN: The approved 6,050-home Master-Planned Developments in the City of Black Diamond will render Green Valley Road a parking lot during peak commuting hours and adversely affect the Upper Green Valley APD and threaten Public safety.</u></p> <ul style="list-style-type: none"> c. In cases when public or privately owned facilities meeting regional needs must intrude into APDs, they should be built and located to minimize 	<p>Rural Forest Focus Areas are addressed in other sections of the Comprehensive Plan.</p> <p>This policy addresses preservation of APD parcels and to work with cities to minimize urban impacts which can harm them. It does not discuss “local services.”</p> <p>Comment noted.</p>	

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<p style="text-align: center;">disruption of agricultural activity.</p> <p>E. Mineral Resources <i>CONCERN: “Demonstration Projects” must not be used to convert resource-based lands into housing subdivisions, as has been proposed in the past (e.g., Reserve Silica site in Ravensdale). King County Code Title 21A.55 -- DEMONSTRATION PROJECTS (.010 and .030) should be strictly adhered to. The Code states the purpose of “Demonstration Projects” as to: “...evaluate alternative development standards and processes prior to amending King County policies and regulations” and “test the efficacy of alternative regulations that are proposed to facilitate increased quality of development and/or increased efficiency in the development review processes;...”</i></p> <p>R-687 King County should prevent or minimize conflicts with mining when planning land uses adjacent to Designated and Potential Mineral Resource Sites. Subarea plans may indicate areas where mining is an inappropriate land use. Designated and Potential Mineral Resource Sites and nonconforming sites should be shown on Mineral Resources Map and subarea plan maps in order to notify nearby property owners and residents of existing and prospective mining activities.</p> <p><i>CONCERN: Policies should include <u>abandoned mine shaft identification and mapping</u>, not just “existing and prospective mining” areas.</i> <i>RECOMMENDATION: Add a 4th sentence to Policy R-687 to read: “Mapping also should identify abandoned mine-shafts to ensure safety for subsequent land uses.”</i></p> <p>Technical Appendix D -- Growth Targets & The Urban Growth Area <u>QUESTIONS:</u> <i>1. Why doesn’t Technical Appendix D reflect the 6,050 housing units for the two Master-Planned Developments approved in 2010 & 2011 by the City of Black Diamond--it only shows 1,900?</i> <i>2. When will the 2013 version be updated?</i></p>	<p>A code amendment to delete the “Reserve Silica” demonstration project is part of the proposed Comp Plan implementing ordinance. The point of demonstration projects is to test new ways of regulating development; if they don’t work or don’t achieve the desired results, they are then not included in the King County Code.</p> <p>Mapping of these properties is conducted by state and federal agencies; this would not be an activity undertaken by the County.</p> <p>The Appendix reflects the adopted growth targets; this is the framework for planning for growth under the Growth Management Act which establishes growth targets as a floor, not a ceiling. Growth targets will be updated in approximately 2019.</p>	
<p>CHAPTER 5</p> <p style="text-align: center;">I. Natural Environment and Regulatory Context</p> <p>A. Integrated Approach</p>		

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<p>E-106 <i>QUESTION: With respect to Critical Areas, does KC (DNRP, DPER, etc.) maintain sufficient information, such that, when new permit applications are reviewed, approved, or rejected, a continuously updated publicly available Critical Areas database is maintained?</i></p> <p><i>QUESTION: What selection process is used to identify and score potential Critical Area sites (e.g., for the Mitigation Reserves Program), whether it may relate to wetlands, streams, etc., or geological concerns such as abandoned coal mines, scarps, faults, etc., and how are these features periodically inspected and status updated?</i></p> <p><i>CONCERN: We understand the need for protection of critical areas for all of us. However, we also recognize the need for citizens to be treated fairly and equally. We do not support special breaks for large developers, who are allowed to mitigate buffer zones with the use of “in-lieu fees” or simply pay minor (to them) fines. These hurt all of us in the long run, especially the regular citizen who has some land he or she lives on and protects. We see education, assistance, and incentives as the best way to engage regular citizens in preserving and perpetuating our critical areas.</i></p> <p>The protection of lands where development would pose hazards to health, property, important ecological functions or environmental quality shall be achieved through acquisition, enhancement, incentive programs and appropriate regulations. The following critical areas are particularly susceptible and shall be protected:</p> <ul style="list-style-type: none"> a. Floodways of 100-year floodplains; b. Slopes with a grade of 40 percent or more or landslide hazards that cannot be mitigated; c. Wetlands and their protective buffers; <p><i>CONCERN: As Wetland buffers must be protected, we remain concerned with the use of “in-lieu fees” in wetland buffer mitigation policies, because major developers, who typically can have a large impact on the nearby environment, shouldn’t be able to “buy their way” out of important and necessary environmental requirements.</i></p> <p><i>RECOMMENDATION: “In-lieu fees” shall not be a mitigation method.</i></p> <ul style="list-style-type: none"> d. Aquatic areas, including streams, lakes, marine shorelines and their protective buffers; e. Channel migration hazard areas; 	<p>The experience of the staff operating the Mitigation Reserve Program has been that when the County aggregates the resources of multiple permit applicants and applies the funds collected through in-lieu fees we are able to undertake far more ambitious and significant habitat restoration projects.</p> <p>See comment above.</p>	

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<p>f. Critical Aquifer Recharge Areas; g. Fish and Wildlife Habitat Conservation Areas; and h. Volcanic hazard areas.</p> <p>E-107 Regulations to prevent unmitigated significant adverse environmental impacts should be based on the importance and sensitivity of the resource. <i>QUESTION: What methodology/measures are used to determine the “importance and sensitivity of the resource”?</i></p> <p>E-109 King County should promote efficient provision of utilities and public services by exempting minor activities from its critical areas regulations, if the agency has an approved best management practice plan approved by King County, and the plan ensures that proposed projects that may affect habitat of listed species be carried out in a manner that protects the resource or mitigates adverse impacts. <i>QUESTION: Define “Minor activities”?</i></p> <p>B. Policy and Regulatory Context 5. Puget Sound Partnership</p> <p>E-114 King County should collaborate with other watershed forum partners to ensure that recommendations of watershed-based salmon recovery plans for King County are integrated with the Puget Sound Partnership recommendations. <i>QUESTION: Who are the “watershed forum partners”?</i></p> <p style="text-align: center;">II. Climate Change</p> <p><i>QUESTION: Why is there no mention of the King County Strategic Climate Action Plan and how the policies in this section tie into it?</i> <i>QUESTION: Will the recently (August 3) announced Federal EPA regulations on greenhouse gas emissions from power-generating facilities affect the policies in this section?</i></p> <p>E-203 King County should collaborate with other local governments regionally, nationally and internationally to set transparent standards to account for the net energy and greenhouse gas emissions impacts of government actions such as constructing transportation infrastructure and providing services such as recycling and transit and should assess and publically publicly report these impacts as practicable.</p> <p>B. Reducing Greenhouse Gas Emissions Countywide</p> <p>E-212 King County will work with its cities and other partners to establish a</p>		<p>This is based on analysis by County staff.</p> <p>The County Code does not include a definition of “minor activities” in Title 21A. Using the dictionary, they are activities of a lesser or smaller amount, size or importance.</p> <p>Watershed Forum Partners are the member jurisdictions that comprise each of the Water Resource Inventory Areas statewide.</p> <p>The King County Strategic Climate Action Plan is mentioned in the Climate Change Section of the Environment chapter and recommendations from the SCAP are embedded throughout this chapter.</p> <p>Thank you for noting this error.</p> <p>The SCAP is now represents the operational plan for King County, and policy decisions relative to the County's approach to addressing GHG reductions in detail will be reflected there. The</p>

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<p>greenhouse gas emissions inventory and measurement framework for use by all King County jurisdictions to efficiently and effectively measure progress toward countywide targets.</p> <p><i>QUESTION: Has this started and what has been done so far?</i></p> <p>New Development</p> <p>E-215 King County shall evaluate proposed actions subject to the State Environmental Policy Act (SEPA) for their greenhouse gas emissions. King County may exercise its substantive authority under SEPA to condition or deny proposed actions in order to mitigate associated individual or cumulative impacts to global warming. In exercising its authority under this policy, King County should consider project types that are presumed to be not significant in generating greenhouse gas emissions and do not require review for their greenhouse gas emissions. Any standards related to consideration of greenhouse gas emissions through the SEPA process shall be subject to council review and adoption by ordinance.</p> <p><i>QUESTION: Has the County Council passed any such Ordinances?</i></p> <p>C. Adaptation</p> <p><i>CONCERN: “Adaptation” simply is a backup to not taking significant actions to reduce Greenhouse Gas Emissions to help stem Climate Change.</i></p> <p>D. Collaboration with Others</p> <p>E-227 King County should support appropriate comprehensive approaches to reducing greenhouse gas emissions, such as market-based emissions reduction programs and products, renewable energy standards for electricity production, and vehicle efficiency performance standards.</p> <p><i>QUESTION: Does the County have the authority to establish Carbon Trading or Carbon Taxes, so as to truly price the true cost of Carbon emissions?</i></p> <p>E-229 King County shall work with the business community to support efforts that reduce energy use and greenhouse gas emissions, and to promote King County and the Puget Sound region as a center for green manufacturing. The county shall also work with community groups, consumers, and the retail sector to promote the consumption of green-manufactured products.</p> <p><i>RECOMMENDATION: Add the following Policy as E-230 (or whatever): “The County should actively seek and share lessons learned with other</i></p>	<p>Comprehensive Plan will provide high-level policy direction to inform and drive those policies.</p> <p>Through the King County-Cities Climate Collaboration (K4C), King County and K4C partners are developing a “Scope 5” online reporting system, which is focused on implementing a web-based greenhouse gas emissions measurement platform for K4C partners that is transparent, current, and provides consistency across agencies. This City of Bellevue is in a leadership role for this project. So far, project partners have been identifying relevant reporting criteria and collecting performance information to be reported through the collaborative effort.</p> <p>At this time the County does not have the authority to establish Carbon Trading or Carbon taxes.</p>

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<p><i>jurisdictions around the country and throughout the world.”</i></p> <p style="text-align: center;">III. Air Quality</p> <p style="text-align: center;">B. Ozone, Fine Particulate, Toxics</p> <p><i>CONCERN: Large “slash burns” in the Rural Area produce fine-particle pollution that is a threat to Public health--County Code should address this issue.</i></p> <p style="text-align: center;">IV. Land and Water Resources</p> <p>3. Biodiversity Conservation Approaches</p> <p>a. Landscape Context</p> <p>E-408 King County should carry out conservation planning efforts in close collaboration with other local governments, tribes, state and federal governments, land owners, and other conservation planning stakeholders.</p> <p><i>RECOMMENDATION: Add “community groups” to the list of those with which KC will collaborate.</i></p> <p>E-409 King County should develop a countywide landscape characterization system based on ecoregions as a key tool for assessing, protecting, and recovering biodiversity.</p> <p><i>QUESTION: What are a “countywide landscape characterization system” and “ecoregions”?</i></p> <p>d. Decisions in the Face of Uncertainty</p> <p>E-417 King County should take precautionary action informed by best available science where there is a significant risk of damage to the environment. Precautionary action should be coupled with monitoring and adaptive management.</p> <p><i>QUESTION: “Precautionary action” is part of good policy, but how do the other Policies herein tie into such action?</i></p> <p>f. Integrated Land and Water Management and Planning</p> <p>E-422 King County’s land use planning, regulatory, and operational functions related to environmental protection, public safety, and equity should be closely coordinated across departments and with other applicable agencies and organizations to achieve an ecosystem-based approach.</p> <p><i>QUESTION: What is the definition of “equity” in this context?</i></p>	<p>This policy has been revised.</p> <p>These terms reflect the state of the practice among ecologists and scientists focused on habitat restoration. The Washington State Department of Ecology has developed a statewide landscape characterization, and groups such as the Nature Conservancy use the term “ecoregions.”</p> <p>Generally County environmental and health regulations are based on the precautionary principle - that policies and regulations should be based on the best available science and avoid adverse environmental impacts.</p> <p>Equity in this context refers to the County's commitment to Equity and Social Justice.</p>

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<p>g. Habitat and Development</p> <p>E-425 Stream and wetland buffer requirements may be increased to protect King County species of Local Importance and their habitats, as appropriate. Whenever possible, density transfers, clustering and buffer averaging should be allowed.</p> <p><i>CONCERN: Successful implementation depends on thorough commitment, follow-through, and monitoring. While we see some such inter-departmental coordination, it must become part of the culture of operation--as departments should not, and cannot, operate at cross purposes.</i></p> <p><i>CONCERN: Buffers and control of development along waterways are required to reduce sedimentation in water, but this requires both consistency in permitting and subsequent enforcement.</i></p> <p><i>CONCERN: Compensation to private property owners should be considered.</i></p> <p><i>RECOMMENDATION: Add the following to Policy E-425 at the end of the first sentence: “but should be applied in such a way as to protect adjacent wetlands and not degrade aquatic habitat.”</i></p> <p>h. Non-Native Species</p> <p>E-429 King County should provide incentives for private landowners who are seeking to remove invasive plants and noxious weeds and replace them with native plants.</p> <p><i>RECOMMENDATION: Add the following to Policy E-429 as a second sentence: “Incentives should include the County providing the native plants.”</i></p> <p>4. Fish and Wildlife Habitat Conservation Areas</p> <p>b. Species and Habitats of Local Importance</p> <p>E-442 King County should conserve and restore salmonid habitats by ensuring that land use and facility plans (transportation, water, sewer, electricity, gas) include riparian and stream habitat conservation measures developed by the county, cities, tribes, service providers, and state and federal agencies. Project review of development proposals within basins that contain hatcheries and other artificial propagation facilities that are managed to protect the abundance, productivity, genetic diversity, and spatial distribution of native salmon and provide harvest opportunities should consider significant adverse impacts to those facilities.</p> <p><i>CONCERN: It was not apparent this was done in late 2013 / early 2014 when</i></p>	<p>Thank you for your comment - this language was added to the Comprehensive Plan.</p> <p>Thank you for your comment - this language was added to the Comprehensive Plan.</p>	

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<p><i>King County and Yarrow Bay negotiated and signed a Development Agreement for the 77-unit Reserves at Woodland upland from the Muckleshoot hatchery west of the City of Black Diamond.</i></p> <p>B. Stormwater Quality</p> <p>E-445 Stormwater runoff shall be managed through a variety of methods, with the goal of protecting surface water quality, in-stream flows, and aquatic habitat; promoting groundwater recharge while protecting groundwater quality; reducing the risk of flooding; protecting public safety and properties; and enhancing the viability of agricultural lands.</p> <p><i>CONCERN: Why is there no stated coordination with KCDOT/RSD (see Policies T-307 and T-326)?</i></p> <p>C. Upland Areas</p> <p>1. Forest Cover</p> <p>E-449 The county shall promote retention of forest cover and significant trees using a mix of regulations, incentives, and technical assistance.</p> <p><i>CONCERN: It appears the County through its “mix of regulations, incentives, and technical assistance” must provide consistent direction to protect upland forest cover to help prevent downslope disaster.</i></p> <p>2. Soils and Organics</p> <p>E-460 King County shall promote livestock waste management that keeps waste out of stormwater runoff and from infiltration to groundwater, and enhances soil health by methods such as combining livestock waste with other plant and animal waste material for incorporation into crop soils.</p> <p><i>CONCERN: King County should provide an incentive program here.</i></p> <p>D. Aquatic Resources</p> <p>E-462 Development shall occur in a manner that supports continued ecological and hydrologic functioning of water resources and should not have a significant adverse impact on water quality or water quantity, or sediment transport, and should maintain base flows, natural water level fluctuations, unpolluted groundwater recharge in Critical Aquifer Recharge Areas and fish and wildlife habitat.</p> <p>1. Watersheds</p> <p><i>QUESTION: How does the planning mentioned herein all tie together?</i></p> <p>2. Wetlands</p>		<p>King County coordinates with Washington DOT on a regular basis.</p> <p>King County provides technical assistance to livestock farmers through the County's agricultural program and the Water Quality Cost Share program. Additionally, King County farmers also receive significant assistance from the King Conservation District in developing Farm Plans for best management practices and technical assistance in a number of areas including water quality and nutrient management.</p> <p>DNRP has multiple programs and staff work to coordinate among them.</p>

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<p>E-481 Alterations to wetlands may be allowed to:</p> <ul style="list-style-type: none"> a. Accomplish a public agency or utility development; b. Provide necessary crossings for utilities, stormwater tightlines and roads; or c. Allow constitutionally mandated “reasonable use” of the property, provided all wetland functions are evaluated, the least harmful and reasonable alternatives are pursued, affected significant functions are appropriately mitigated, and mitigation sites are adequately monitored. <p><i>RECOMMENDATIONS: Rewrite Policy E-481 as follows:</i></p> <p><i>E-481 “Provided that all wetland functions are evaluated, the least harmful and reasonable alternatives are pursued, affected significant functions are appropriately mitigated, and mitigation sites are adequately monitored-- alterations to wetlands may be allowed to:</i></p> <ul style="list-style-type: none"> <i>a. Accomplish a public agency or utility development;</i> <i>b. Provide necessary crossings for utilities, stormwater tightlines and roads; or</i> <i>c. Allow constitutionally mandated “reasonable use” of the property.”</i> <p>E-488 King County should be a regional service provider of compensatory mitigation through the Mitigation Reserves Program by working with local cities, other counties, and state agencies to establish partnerships for implementation of inter-jurisdictional in-lieu fee mitigation.</p> <p><i>CONCERN: (See CONCERN under E-106) Wetland buffers must be protected and we remain concerned with the use of “in-lieu fees” in wetland buffer mitigation policies, because major developers, who typically have a large impact on the environment, shouldn’t be able to “buy their way” out of important and necessary environmental requirements.</i></p> <p>3. Lakes</p> <p>E-492 Swimming beaches on lakes should be monitored for bacterial contamination and algal toxins. When data shows public health to be at risk, Public Health -- Seattle & King County should take appropriate action to address public health risks.</p> <p><i>RECOMMENDATION: Add the following Policy (somewhat similar to Policy E-499j):“King County should work with landowners, the state Department of Health, and Public Health -- Seattle & King County to develop more cost-</i></p>		<p>Thank you for your comment - this policy was revised.</p> <p>See previous comments regarding mitigation banking and in-lieu fees.</p> <p>This policy is implemented through the Stormwater Code and Land Use Development Code. King County is working with 10 other coastal counties to create a robustly funded low interest loan program</p>

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<p><i>effective strategies and additional resources for addressing failing septic systems in constrained shoreline environments.”</i></p> <p>4. Groundwater Resources</p> <p>E-497 King County should protect groundwater in the Rural Area by:</p> <p><u>QUESTION: How is this Policy implemented?</u></p> <p>a. Preferring land uses that retain a high ratio of permeable to impermeable surface area, and that maintain and/or augment the natural soil’s infiltration capacity and treatment capability for groundwater; and</p> <p>b. Requiring standards for maximum vegetation clearing limits, impervious surface limits, and, where appropriate, infiltration of surface water.</p> <p>5. Rivers and Streams</p> <p>E-499a When King County places large wood in rivers and streams for habitat restoration or enhancement, it should do so in a manner that minimizes danger to the public.</p> <p><u>RECOMMENDATION: Add “and assume liability” after “...danger to the public.”</u></p> <p>E-499c The designation of buffers for aquatic areas, including rivers and streams, should take into account watershed-scale actions to mitigate the impacts of upland development on flooding, erosion, and habitat.</p> <p><u>CONCERN: (See comments under E-425) Buffers and control of development along waterways are required to reduce sedimentation in water, but this requires both consistency in permitting and subsequent enforcement.</u></p> <p><u>RECOMMENDATION: Add the following as a second sentence to Policy E-499c: “Buffers should be applied in such a way as protect adjacent wetlands and not degrade aquatic habitat.”</u></p> <p>6. Puget Sound</p> <p>E-499i King County should work with landowners, the state Department of Health, sewer districts, and the Puget Sound Partnership to develop more effective strategies and additional resources for addressing failing septic systems in constrained shoreline environments.</p> <p><u>CONCERN: This could be cost prohibitive.</u></p> <p>V. Geologically Hazardous Areas</p> <p>A. Erosion Hazard Areas</p> <p>E-503 Slopes with a grade of 40 percent or more shall not be developed unless the</p>	<p>to address failing systems. The program’s repayment structure is scaled dependent on income. For property owners in the low income bracket, there is an option to repay the loan at time of sale. We anticipate the program will be available in King County by early 2017.</p> <p>This request is not included in the 2016 Plan. County practices already reflect liability issues.</p> <p>The language as proposed in the Public Review Draft reflects the County's commitment to undertake habitat restoration work, while minimizing danger to the public.</p> <p>See response above re: E-492.</p>	

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<p>risks and adverse impacts associated with such development can be reduced to a nonsignificant level. No-disturbance zones shall be designated where basin plans identify the need to prevent erosion damages in areas that are extremely sensitive to erosion impacts. Properly designed stormwater tightlines may be allowed within designated no-disturbance zones.</p> <p><i>QUESTION: What is a “stormwater tightline”?</i></p> <p>E. Coal Mine Hazard Areas E-513 King County shall allow development within coal mine hazard areas if the proposal includes appropriate mitigation for identified, mine-related hazards using best available engineering practices and if the development is in compliance with all other local, state and federal requirements.</p> <p><i>QUESTION: Why?</i></p> <p>VI. Monitoring and Adaptive Management D. Effectiveness of Critical Areas Regulations E-608 King County should develop and implement a framework for effectiveness monitoring of critical areas regulations, and use monitoring data to inform the future review and updates of its critical areas policies and regulations.</p> <p><i>QUESTION: How is this data collected and published?</i></p>	<p>A Stormwater Tightline is a continuous length of pipe used to convey flows down a steep or sensitive slope.</p> <p>This allows for a reasonable use of private property.</p>
<p>CHAPTER 6 - PARKS, OPEN SPACE AND CULTURAL RESOURCES</p> <p><i>QUESTION: Why are there no Policies that address the included Regional Trails Needs Report (P-120 is the only policy that even mentions it).</i></p> <p>I. Parks, Recreation and Open Space</p> <p>A. The Regional Open Space System of Parks, Trails, Natural Areas and Working Resource Lands <i>CONCERN: We have had concerned citizens voice problems they have repeatedly encountered including: multiple users of combined or adjacent facilities, inadequate parking, little to no rule enforcement, and Public safety.</i></p> <p>B. Components of the Regional Open Space System 1. Regional Recreation Sites, Multiuse Sites and Trails P-108 King County will continue to provide and manage a backcountry trail system on</p>	<p>Many of the policies reflect the findings of the Regional Trails Needs, while not referencing it explicitly. The report forms the foundation of many of the County's policies and operational practices.</p> <p>King County Parks is currently working to expand the parking lot located on county-owned land off of 276th Ave SE. We do work with Seattle Public Utilities on supporting public access on trails in the 208th area. However, Seattle Public Utilities as the landowner of the 208th/Watershed Gate lands ultimately determines access to their properties.</p>

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<p>its lands in collaboration with other public and private landholders.</p> <p><i>CONCERN:</i> <i>King County owns, operates, and maintains the Taylor Mountain Park. Many people use this facility for trail hiking and horseback riding. One historical access to this Park and its many miles of trails has been an entrance on SE 208th St--owned by the City of Seattle (Seattle Public Utility Department) as part of its Cedar River Watershed. This entrance provides access to several major trails and roads that in turn access the many trails in the Park. The County has been trying to buy up all private land ownerships since it acquired the Park from Manke Lumber Co back in the 1990s. Recently, the last remaining landowner sold his property to the County following the settlement of a lawsuit. Although this particular dispute was settled, the larger concern still looms; namely, closure of this access will deny individuals access to the County Park from this point. The lawsuit and settlement agreement did not address nor resolve several issues.</i></p> <p><i>QUESTION:</i> <i>Will King County Parks work with the City of Seattle Public Utility Department to ensure the SE 208th St access to Taylor Mountain Park via the Seattle Watershed will remain open to the Public for hiking and horseback riding? There also is a large off-road parking area at stake here, again, all on the Seattle Watershed property.</i></p> <p>4. Working Resource Lands Forestland</p> <p>P-118 Forest land owned by King County shall provide a balance between sustainable timber production, conservation and restoration of resources, and appropriate public use.</p> <p><i>QUESTIONS:</i> <i>How is this “balance” achieved? How is progress towards that balance measured?</i></p> <p>5. Other Open Spaces C. Achieving the Open Space System Priorities</p> <p><i>CONCERN:</i> <i>Policies should not allow siting and approval of urban or largely urban-serving facilities in Unincorporated or Rural Areas as a <u>tradeoff</u> to secure additional Open Space and/or Trail Connections, as was partly done through the Development Agreement between the County and Yarrow Bay concerning the Reserves at Woodlands just west of the City of Black</i></p>	<p>King County works with staff from Water and Land Resource and Parks to manage forest land, and ensure that our forests remain healthy, while providing habitat and public recreation benefits. Management within DNRP is responsible for striking the correct balance between those three policy objectives.</p>	

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<p><i>Diamond in early 2014. In this case the “urban-serving facility” was a massive Stormwater Retention “Lake” (~20-ac in size with a 40-ac footprint) to serve (and help enable) the adjacent Yarrow Bay Master-Planned Developments wholly contained with the City of Black Diamond.</i></p> <p>Managing the System</p> <ul style="list-style-type: none"> <i>RECOMMENDATION: The update to the 2012 King County’s Open Space System Map should include Parks, Farmland Preservation properties, and Transfer of Development Rights (TDRs) easements.</i> <p>II. Cultural Resources</p> <p><i>QUESTIONS: While the Policies herein comprise laudable goals, what means does the County use to follow-through in identifying and preserving such cultural resources?</i></p> <p>P-202 King County shall consider equity and social and environmental justice in its promotion and protection of cultural resources.</p> <p><i>QUESTIONS: How does KC define “equity and social and environmental justice”? What resources/references (e.g., Strategic Plans, etc.) can we review to better understand such definitions?</i></p>	<p>The Open Space Map does not provide the level of detail suggested in this comment. However, maps showing FPP and TDR properties are available from the County.</p> <p>The County has a Historic Preservation Program housed within the Department of Natural Resources and Parks (http://www.kingcounty.gov/property/historic-preservation.aspx). Among the resources available is the County's Strategic Plan for Historic Preservation and the Landmarks Commission.</p> <p>Through adoption of the King County Strategic Plan 2010-2014: Working Together for One King County, King County has transformed its work on equity and social justice from an initiative to an integrated effort that applies the countywide strategic plan's principle of "fair and just" intentionally in all the county does in order to achieve equitable opportunities for all people and communities. To read more about the County's ESJ Program go to http://www.kingcounty.gov/elected/executive/equity-social-justice.aspx</p>
<p>CHAPTER 7 -- TRANSPORTATION</p> <p><i>Several of the comments below have been provided to KCDOT Director Taniguchi both in-person (9/16/14 Transportation Forum) and in writing (detailed Issue/Solutions Papers). The aforementioned Forum, organized by the three Rural Area UACs plus the new GV/LHA organization, specifically addressed Unincorporated and Rural Area transportation issues and</i></p>	

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<p><i>solutions. The Forum included KC Council people and staff, KCDOT Director and staff, PSRC, and State Legislators including the Chairwoman of the House Transportation Committee, Judy Clibborn.</i></p> <p>E. General Policy Guidance</p> <p>T-102 As a transportation provider and participant in regional transportation planning, King County should support, plan, design, and implement an integrated, coordinated and balanced multimodal transportation system that serves the growing travel needs of the county safely, effectively and efficiently and promotes a decrease in the share of trips made by single occupant vehicles.</p> <p><i>CONCERN: Regional policies should explore the establishment of County road “networks,” which know no jurisdictional boundaries (similar to State roads), funded by all County taxpayers.</i></p> <p><i>RECOMMENDATION: A second sentence should be added to T-102: “King County should explore establishing county-wide “road networks,” which know no jurisdictional boundaries, or a Transportation Benefit District, both funded by all County taxpayers.”</i></p> <p>II. Providing Services and Infrastructure that Support the County Land Use Vision</p> <p>D. Road System</p> <p>T-208 King County shall not add any new arterial capacity in the Rural Area or natural resource lands, except for segments of rural regional corridors that pass through rural or resource lands to accommodate levels of traffic between urban areas. Rural regional corridors shall be identified in the Transportation Needs Report (Appendix C) and shall meet all of the following criteria:</p> <ol style="list-style-type: none"> Connects one urban area to another, or to a highway of statewide significance that provides such connection, by traversing the Rural Area; Classified as a principal arterial; Carries high traffic volumes (at least 15,000 ADT); and At least half of P.M. peak trips on the corridor are traveling to cities or other counties. <p><i>CONCERN: Such “rural regional corridors,” so designated “to accommodate levels of traffic between urban areas,” cannot be sustainably funded simply by Rural Area property taxes. T-208 simply provides a means of identifying such “corridors,” but provides no solutions.</i></p>	<p>See Comprehensive Plan Chapter 8, section B. Road Related Funding Capabilities, for information related to the Bridges and Roads Task Force recommendations on road funding.</p> <p>Please note that county-wide road networks are not one of the recommendations of Task Force.</p> <p>A Transportation Benefit District is just one of many funding options that are being explored by the county.</p> <p>See Chapter 8, section B. Road Related Funding Capabilities, for additional information related to the Bridges and Roads Task Force recommendations on road funding. County-wide road networks were not one of the recommendations of Task Force. A Transportation Benefit District is just one of many funding options that are being explored by the county.</p>

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<p><i>RECOMMENDATIONS:</i> Besides <i>RECOMMENDATIONS</i> given under T-102 above, to begin to address the Rural road usage/funding imbalance problem State laws (RCWs 36.78, 46.68, 120-124, & 84.52) could be reviewed for opportunities to enable a more transportation-sustainable allocation of gas tax monies and provide more flexibility in revenues used. Working with the State, some mechanism should be developed, along with incentives, for cities to share revenues with Counties, possibly tied to growth that occurs in the absence of job opportunities.</p> <p><i>Policies should explore the Puget Sound Regional Council’s (PSRC’s) Transportation 2040 user-pays model by providing authority for usage charges, such as tolling key roads and methods to implement such strategies.</i></p> <p>T-209 King County shall avoid construction of major roads and capacity expansion on existing roads in rural and resource areas. Where increased roadway capacity is warranted to support safe and efficient travel through rural areas, appropriate rural development regulations and strong commitments to access management should be in place prior to authorizing such capacity expansion in order to prevent unplanned growth in rural areas.</p> <p><i>CONCERN:</i> Unfortunately, where “increased roadway capacity is warranted” is on County rural roads that bridge urban areas and are primarily used during peak hours by urban commuters (defined as “rural regional corridors” in T-208). Consequently, should any “increased roadway capacity” be contemplated, it should be paid proportionally by those Urban residents, not primarily fall on the backs of Rural Area property taxpayers (see <i>CONCERNS AND RECOMMENDATIONS</i> under R-208).</p> <p>H. Concurrency <i>CONCERN:</i> Concurrency must have an enforcement mechanism and be linked to a public dialog.</p> <p><i>Infrastructure needs should be identified as early and accurately as possible, with implementation of identified improvements truly concurrent, otherwise the development approval must be delayed or denied.</i></p> <p>T-224 In the Rural Area, the concurrency test may include a provision that allows the</p>	<p>T-403 and T-407 address this issue.</p> <p>Comments noted. State law changes are outside the scope of the Comprehensive Plan update.</p> <p>Tolling and usage fee concepts are addressed under congestion pricing in T-250, 251, 252.</p> <p>T-403 and T-407 address this issue.</p>

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<p>purchase of Transferable Development Rights in order to satisfy transportation concurrency requirements.</p> <p>CONCERN: <i>Within a failing Travel Shed purchasing TDRs should not allow granting of a Concurrency certificate, since traffic is still being <u>added</u> to a failing area.</i></p> <p>QUESTION: <i>Do examples exist where T-224 was applied?</i></p> <p>KCDOT's Ruth Harvey responded to our QUESTION above by saying the Policy has never been applied. Also, in collaboration with the FCUAC's Tom Carpenter, we have communicated with KC DNRP's Darren Greve regarding the TDR program. Consequently, we developed the following:</p> <p>RECOMMENDATION: <i>Eliminate Policy T-224, as TDRs should not be used to satisfy Concurrency testing anywhere within the Rural Area. Concurrency is a tool used to ensure infrastructure keeps up with development. The use of TDRs to satisfy Concurrency testing does nothing to help reach that goal and, in fact, can hinder reaching that goal.</i></p> <p>RECOMMENDATION: <i>Add a new Policy under Concurrency to address the item the KC Council added to "Scope of Work" as follows:</i></p> <p>T-xxx <i>When conducting concurrency testing, King County shall collaborate with other jurisdictions to ensure infrastructure improvement strategies help prevent travel shed failure caused by unfunded city and state projects and traffic generated outside the unincorporated area.</i></p> <p>T-251 King County supports variable tolling strategies as a means to optimize transportation system performance, generate revenues and reduce vehicle miles traveled, and reduce greenhouse gas emissions. <i>(See CONCERNS and RECOMMENDATIONS under T-208)</i></p> <p>IV. Financing Services and Facilities that Meet Local and Regional Goals C. Funding priorities consistent with transit and road strategic plans</p> <p>T-403 The unincorporated county road system provides transportation connections for large numbers of users that travel through the Rural Area to reach adjoining cities, other counties or regional destinations. King County should seek and</p>	<p>See comments above regarding Concurrency and TDRs.</p> <p>Comment noted.</p> <p>Edits make to this section, however, as noted above, the policy is not revised as requested.</p> <p>Comment noted. The County has no authority, and little to no influence, over city/state infrastructure improvements or traffic generated in other jurisdictions.</p>	

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<p>support regional funding sources that could be used to repair and maintain the arterial system. (see <i>CONCERNS</i> and <i>RECOMMENDATIONS</i> under T-208)</p> <p>D. Revenue Shortfall T-409 King County shall maximize its efforts to obtain federal and state funding for its transportation services, infrastructure and facility improvements. (see <i>CONCERNS</i> and <i>RECOMMENDATIONS</i> under T-208)</p> <p>V. Coordination and Public Outreach A. Regional Coordination (see <i>CONCERNS</i> and <i>RECOMMENDATIONS</i> under T-208)</p> <p>Technical Appendix C -- Transportation & Transportation Needs Report <u>CONCERNS:</u> <i>The Growth Management Act (GMA) created a framework for the management of population growth within the State of Washington. Each County administers the GMA in concert with State and regional organizations, such as the Puget Sound Regional Council (PSRC). One of the goals of the GMA is to ensure infrastructure requirements are identified early, are part of the Comprehensive Plan process, and are met in a timely fashion. Accurately assessing future transportation needs is key to viable and sustainable growth within the State and, in particular, within King County--one of the fastest growing counties in the country. The GMA requires jurisdictions to establish growth targets: “A growth target is the minimum number of residents or jobs that a jurisdiction must accommodate and will strive to absorb in some future year. Growth targets reflect aspirational goals, but must be rooted in objective analysis....They are a primary input to developing a comprehensive plan, with the target impacting or guiding nearly every plan element, particularly the land use, housing, and transportation elements. This in turn guides the development regulations, as they are required to be consistent and implement the comprehensive plan policies.” (Ref. 3, p. 5.)</i></p>	<p>Tolling and usage fee concepts are addressed under congestion pricing in T-250, 251, 252.</p> <p>Comments noted.</p> <p>The concerns and recommendation raise important points. However, state law changes are outside the scope of the Comprehensive Plan update. That said, the County does participate in regional forums such as the Planning Directors, Interjurisdictional Team, Growth Management Planning Council, Puget Sound Regional Council, and others. These issues are discussed in these forums.</p>

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<p><i>Currently, “No direction is given in the GMA as to the methodology for setting growth targets. Cities and counties have a duty to accommodate the targets, but are provided broad discretion on how they do so.” (Ref. 3, p. 11.) This can result in an opaque process through which cities utilize selective criteria to furnish information they deem relevant or advantageous. Further, jurisdictions can grossly exceed their growth targets. This was the case in 2012, as a small city in Southeast King County, in one of the fastest growing and heavily congested areas in the State, with a growth target of 1,900 people, signed Development Agreements that would eventually bring an additional 6,050 residences, or approximately 20,000 people, into the city. This scenario could easily repeat itself throughout the county and state as long as it remains to each county and its cities to determine what is relevant in developing such projections.</i></p> <p><i>To compound the problem, another disconnect occurs when King County uses adopted growth targets for both the cities and the unincorporated areas to forecast future traffic loads, which then are used to identify road capacity needs on unincorporated area roads.</i></p> <p><i>A great dichotomy exists between growth targets, which are <u>not</u> forecasts, and identifying and addressing transportation needs. Such a gap complicates planning efforts and, as more development occurs, could result in inadequate infrastructure to meet GMA Concurrency requirements.</i></p> <p><i>It is desired forecasts, not allocated growth targets, be the primary information that supports Comprehensive Planning and the identification of infrastructure needs.</i></p> <p><i>RECOMMENDATIONS: Potential solution paths for discussion: State law could be revised to establish criteria to ensure forecasting, not growth targets, inform Comprehensive Planning and Transportation Needs Reports. The following RCWs could provide such opportunities:</i></p> <p><i>RCW 43.62 -- DETERMINATION OF POPULATIONS -- STUDENT ENROLLMENTS</i></p> <p><i>43.62.035 -- Determining population -- Projections</i></p> <p><i>RCW 36.70A -- GROWTH MANAGEMENT -- PLANNING BY SELECTED COUNTIES & CITIES.</i></p>	

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<p style="text-align: center;">36.70A.040 -- Who must plan -- Summary of requirements– <i>Development regulations must implement comprehensive plans [Requires cities and unincorporated areas to plan for future growth through formation of Comprehensive Plans. In King County, Comprehensive Plans are reviewed/revised every four years with the current target year of 2025. Many King County cities currently are updating their Comprehensive Plans to be completed by June 2015.]</i> <i>[References: 1. Vision 2040, PSRC, December 2009.; 2. Transportation 2040 Plan Update, PSRC, May 29, 2014; 3. “Growth Management by the Numbers,” PSRC, July 2005; 4. “The First Round of Growth Targets Since VISION 2040 Adoption,” PSRC, Presentation to the Growth Management Policy Board, March 2014.]</i></p>	
<p>CHAPTER 8 -- SERVICES, FACILITIES & UTILITIES</p> <p>II. Facilities and Services</p> <p>F. Financing Strategies</p> <p>F-224 King County shall work with the cities to create a financing partnership for areas of the Urban Growth Area that the cities will annex. This includes determining county/regional and city/municipal facilities and services and then committing to a shared financing strategy to build or provide these infrastructure improvements or services.</p> <p><i>(Similar to comment provided on Ch. 2, Sec. II, U-207) Bonded Debt: State law (RCWs 35.13.110; 35.13.270, and 35A.14.801) is rigid here.</i> RECOMMENDATION: <i>Revisit State law (RCWs 35.13.110; 35.13.270, and 35A.14.801) so that Counties and Cities have the opportunity to “negotiate” any transfer of bonded debt incurred within the annexed area. Approval of County bonded debt could be similar to how cities do so upon annexation by offering a vote to the annexing residents and allow the county to require a disapproval of the annexation should residents vote against the bonded debt continuance.</i></p> <p>G. Essential Public Facilities</p> <p>F-230 Siting analysis for proposed new or expansions to existing essential public facilities shall consist of the following:</p>	<p>Comments noted; see the Workplan section of Chapter 12. It includes a workplan to revisit the Annexation Areas Map and Countywide Planning Policies. This type of analysis may be an important part of this future work.</p>

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<p>a. An inventory of similar existing essential public facilities in King County and neighboring counties, including their locations and capacities;</p> <p>b. A forecast of the future needs for the essential public facility;</p> <p>c. An analysis of the potential social and economic impacts and benefits to jurisdictions receiving or surrounding the facilities;</p> <p>d. An analysis of the proposal’s consistency with policies F-226 through F-229;</p> <p>e. An analysis of alternatives to the facility, including decentralization, conservation, demand management and other strategies;</p> <p>f. An analysis of economic and environmental impacts, including mitigation, of any existing essential public facility, as well as of any new site(s) under consideration as an alternative to expansion of an existing facility;</p> <p>g. Extensive public involvement; and</p> <p>h. Consideration of any applicable prior review conducted by a public agency, local government, or citizen’s group.</p> <p><i>(Similar to comment provided on Ch. 3, Sec. II, Subsec A, R-201) <u>Siting of Urban facilities in the Rural Area: Policies must be strengthened to forbid siting and approval of urban or largely urban-serving facilities in Unincorporated or Rural Areas. As an example, the following King County Code should be amended:</u></i></p> <p><i><u>KCC 21A.08.060 A. Government/business services land uses, under “Specific Land Use” – “Utility Facility” by adding Note #38 as a Development Condition to all Zoning Designations.</u></i></p> <p><i><u>Note #38: Utility Facilities consisting of regional surface water flow control and water quality facilities that are proposed to be wholly located within a Resource or Rural-designated area and associated in whole or in part with an existing or new proposed private residential development that is located wholly within an Urban-designated area are prohibited. Where such conditions are proposed for a new facility or where substantial facility or service area modifications to an existing regional surface water flow control and water quality facility are proposed, the requirements under Note #8 shall apply to Utility Facilities.</u></i></p>	<p>While revisions to policies have been included in multiple locations, this section of Code has not been deleted given the current and ongoing activities related to the stormwater detention issue near the master planned development.</p>

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<p><i>RECOMMENDATION: Add item “i” to R-301 as follows:</i> <i>“i. Rural uses not including urban or largely urban-serving facilities.”</i></p> <p>II. Facilities and Services H. Water Supply 5. Resource Management and Protection</p> <p>F-254 Groundwater-based public water supplies should be protected by preventing land uses that may adversely affect groundwater quality or quantity to the extent that the supply might be jeopardized. The county shall protect the quality and quantity of groundwater used as water supplies through implementation of Policies E-493 through E-497 where applicable.</p> <p><i>QUESTION: How are Policy F-254, along with Policy E-497 (“King County should protect groundwater in the Rural Area...”) implemented?</i></p> <p>I. Public Sewers and On-Site Wastewater Treatment and Disposal Systems</p> <p>F-259 Sewer facilities such as pump stations, force mains and trunk lines that do not provide connections to the Rural Area may be located in the Rural Area only when they are identified in a King County-approved comprehensive sewage system plan and upon a finding by King County that it is technically necessary in providing service to the Urban Growth Area.</p> <p><i>QUESTIONS: Under what conditions would “a King County-approved comprehensive sewage system plan” find it necessary to locate such “sewer facilities” in the Rural Area? What criteria are used to determine “technical” necessity?</i></p> <p>F-261 King County should monitor onsite systems that have shown evidence of failure or potential for failure. The data should be used to correct existing problems and prevent future problems. King County should analyze public funding options for correcting on-site wastewater system failures which may include, where feasible and otherwise consistent with this plan, conversion to community sewage systems or installation of public sewers.</p> <p><i>CONCERN: This should only apply to the UGA, except where there is a documented threat to Public health.</i></p>	<p>Please see response to earlier comment on R-301.</p> <p>Policies with respect to protecting groundwater are implemented through the Public Health Code, Stormwater Code and Land Use Development Code.</p> <p>There are several circumstances where an approved comprehensive sewer plan would recommend sewer facilities be located in the rural area. One is to protect public health and safety. In this case the sewer facilities would be located in the rural area in response to an identified public health need. An example of this is failure of onsite septic systems where there is no practical solution other than sewer facilities. Another circumstance is a sewer traversing the rural area. This occurs when topography or avoidance of environmental impacts make it more practical to connect two urban areas with sewer service by crossing the rural area with a sewer pipe. In this case the sewer in the rural area must be “tightlined” or otherwise subject to access restriction precluding service to adjacent rural area. In either of these cases the approved sewer comprehensive plan must present the project and any supporting document must demonstrate the public health or technical rationale for locating a sewer facility in the rural area. Also, King County is working with a group of stakeholders to update</p>

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<p>K. Surface Water Management F-274 In the Rural Area, King County shall minimize the use of constructed facilities for surface water management and maximize the use of natural systems, provided that the ecological functions of the natural systems are not harmed. The county should provide incentives to keep these natural systems intact. Natural systems are also preferred in the Urban Growth Area, but it is recognized that structural systems will be needed to realize urban growth and density goals.</p> <p><i>CONCERN: As mentioned under Chapter 3’s R-201 and R-326, Policies must be strengthened to forbid siting and approval of urban or largely urban-serving facilities in Unincorporated or Rural Areas. As an example, the following King County Code should be amended:</i></p> <p><i>KCC 21A.08.060 A. Government/business services land uses, under “Specific Land Use” – “Utility Facility” by adding Note #38 as a Development Condition to all Zoning Designations:</i></p> <p><i>Note #38: Utility Facilities consisting of regional surface water flow control and water quality facilities that are proposed to be wholly located within a Resource or Rural-designated area and associated in whole or in part with an existing or new proposed private residential development that is located wholly within an Urban-designated area are prohibited. Where such conditions are proposed for a new facility or where substantial facility or service area modifications to an existing regional surface water flow control and water quality facility are proposed, the requirements under Note #8 shall apply to Utility Facilities.</i></p> <p><i>RECOMMENDATION: Add a 4th sentence to F-274 to read:</i> <i>“New stormwater facilities primarily serving urban residents shall be located within the UGA.”</i></p>	<p>the King County On-Site Septic System Management Plan. The plan will go to the Board of Health for approval. King County uses a risk based approach to address failing systems in locations with known pollution problems and high risk drinking water aquifers.</p> <p>This policy has been revised to address this issue.</p> <p>See comments above. King County believes the language in the 2016 draft is adequate, and that the issue of concern has been addressed elsewhere in the Comprehensive Plan.</p> <p>See previous comments regarding stormwater facilities in rural areas.</p>
CHAPTER 9 -- ECONOMIC DEVELOPMENT	
<p>I. Overview C. General Economic Development Policies ED-102 The focus for significant economic growth will remain within the Urban Growth</p>	

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<p>Area, while within the Rural Area, the focus will be on sustaining and enhancing prosperous and successful rural businesses as well as encouraging new businesses that support and are compatible with the rural economic clusters.</p> <p>CONCERN: <i>There are five rural economic clusters identified: (1) Agriculture, (2) Forestry, (3) Equestrian, (4) Home-Based Businesses, (5) Recreation and Tourism, and (6) Commercial/Industrial Rural Neighborhood Commercial Centers, Rural Towns, and Rural Cities. Our concern lies with the last “cluster” listed “Commercial/Industrial Rural Neighborhood Commercial Centers.” Other than those which already exist, we would have a concern if policies herein allow, or direct, establishment of new such clusters.</i></p> <p>RECOMMENDATION: <i>Insert: “and new businesses which may form new rural economic clusters “after “.... with the rural economic clusters. “</i></p> <p>ED-103 King County policies, programs, and strategies shall recognize the importance of, and place special emphasis on, retaining and expanding homegrown firms in basic industries that bring income into the county and increase the standard of living of our residents.</p> <p>QUESTION: <i>How does the County “retain and expand homegrown firms”?</i></p> <p>RECOMMENDATION: <i>Insert “encouraging start-ups and” after “...., and place special emphasis on,”</i></p> <p>ED-104 King County policies, programs, and strategies shall recognize the importance of a diversified economic base to provide a continuum of job opportunities to meet the skill levels of all workers.</p> <p>QUESTION: <i>How does the County define “diversified”?</i></p> <p>RECOMMENDATION: <i>Insert “, evolving” after “....the importance of a diversified...” and after “skill levels” to “skill-level demands.” Industry, technology, and skills needs required of the workforces change over time as one level of technology is replaced by another (requiring workforce re-training and adaptation.</i></p> <p>ED-105 King County recognizes the environment as a key economic value that must be protected.</p> <p>CONCERN: <i>The term “environment” by itself, makes no statement about metrics nor sets goals for stability or improvement(s), but seemingly is accepting of the new state of things without regard for where these changes</i></p>	<p>Comment noted, however, this policy was not revised and this issue is partly addressed in revisions to other policies.</p> <p>This policy in the 2016 Plan has been revised to address this request.</p> <p>This policy in the 2016 Plan has been revised to address this request.</p>	

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<p><i>may be going. However, ecosystem interactions and interdependencies are important. These can be measured over time. Ecosystems analysis, environmental planning, and other disciplines help identify, study, propose, and plan for any needed corrective action strategies.</i></p> <p>RECOMMENDATION: Insert “and ecology” after “...recognizes the environment.”</p> <p>ED-106 King County shall protect cultural resources and promote expanded cultural opportunities for its residents and visitors in order to enhance the region’s quality of life and economic vitality.</p> <p>CONCERN: Promoting cultural resources aids in protecting history and heritage, which includes people (and dress), culture, artifacts, etc. and related preservation gatherings and festivals. Promoting legacy and loyalty has historically been important to bringing in resources for survival, and for producing and protecting a communities identity and well being.</p> <p>RECOMMENDATION: Insert “promote and” after “King County shall...”</p> <p>ED-107 At the multicounty level, King County should partner with other counties, regional entities and the state, as appropriate, to devise and implement economic development policies, programs and strategies to provide for sustainable and equitable growth throughout the Puget Sound region.</p> <p>RECOMMENDATION: Insert “and federal agencies” after “...and the state...”</p> <p>ED-109 Within the unincorporated areas, King County should partner and engage with local businesses, the Agriculture and Rural Forest Commissions, community service areas, adjacent cities, other organizations and residents, as appropriate, to develop and implement policies, programs, and strategies that promote compatible local economic development.</p> <p>RECOMMENDATION: Insert “the Fish and Wildlife Commissions” after “...engage with local businesses,”</p> <p>II. Business Development</p> <p>GENERAL CONCERN: Business development could be better served should the County proactively promote and support such enterprises. This is especially the case with small start-ups and small businesses. One simple strategy could be to start a Newsletter describing new business-to-business opportunities, as well as services provided by various County agencies to</p>	<p>This policy in the 2016 Plan has been revised to address this request.</p> <p>This policy is not revised as the County no longer has a program to promote these issues.</p> <p>The County works with federal partners on these issues. This revision does not appear to be necessary.</p> <p>The County works with state partners on these issues. This revision does not appear to be necessary.</p>

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<p>resources.</p> <p>QUESTION: How is this accomplished, e.g., through “education” programs?</p> <p>ED-503 King County shall identify and evaluate potential changes to land use development regulations and building codes to support and promote sustainable development.</p> <p>QUESTION: How is this accomplished?</p> <p>RECOMMENDATION: Insert “, as well as time-dependent ecosystems and economic impacts,” in front of “to support and promote”.</p> <p>ED-504 King County should participate in the development of national standards for measuring sustainability at the community scale and the breadth and effectiveness of county policies and practices that improve community-scale sustainability.</p> <p>RECOMMENDATION: Insert “and goals” in front of “for measuring”.</p> <p>VI. The Rural Economy</p> <p>ED-601 King County is committed to a sustainable and vibrant rural economy that allows rural residents to live and work throughout the Rural Area and Natural Resource Lands. County policy, regulations, programs should be reviewed and developed in partnership with rural businesses, the Agriculture and Rural Forest Commissions, the community service areas, the unincorporated area councils, and others to support the preservation and enhancement of traditional rural economic activities and lifestyles, while supporting evolving compatible commercial uses and job opportunities.</p> <p>QUESTIONS: What is meant by “enhancement of traditional rural economic activities”? What are “evolving compatible commercial uses”? What is intended by putting the two concepts together?</p> <p>CONCERN: The Rural Area includes communities fronting estuaries, lakes, rivers, streams, and wetlands. The plants, animals, and various natural; heritage elements within these communities are important to the rural economy, such as fisheries, tourism, and equipment development in support of these industries (pollution control, police interdiction, first responder, etc.).</p> <p>RECOMMENDATION: Insert “the Fish and Wildlife Commissions,” after “...partnership with rural businesses,”.</p>	<p>See previous comments regarding the County's capacity for economic development planning.</p> <p>Policy revised to reflect the use of existing standards.</p> <p>Comment noted.</p> <p>The County already works with state and federal partners. This revision does not appear to be necessary.</p>

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<p>ED-602 King County shall use the Rural Economic Strategies to guide future rural economic development and will modify and add strategies as needed to reflect the evolving nature of the rural economy, while protecting the traditional rural economic clusters.</p> <p>a. King County recognizes the value of the agriculture and forestry clusters for both their economic contribution and for their natural, educational, and recreational benefits to the county as a whole. The county will work with the Agriculture Commission, Rural Forest Commission, and other related organizations on strategies and programs to strengthen and enhance the economic viability of these clusters and the evolving value-added industry that helps sustain the county’s legacy of raising crops and livestock and managing and harvesting forestlands.</p> <p>b. King County recognizes the value of home-based business, recreation and tourism, and commercial/industrial clusters for their ability to provide job opportunities in the rural area and help sustain the rural economic base. The county will continue to work with chambers of commerce and other organizations that support these rural businesses to help ensure the continued viability and economic health of new and existing businesses in these clusters.</p> <p><i>QUESTION: How does the County define “commercial/industrial clusters” and scales envisioned and how they relate to the Rural Area and its Rural Character?</i></p> <p><i>RECOMMENDATION: Insert: “promote, develop, and” after “support these rural businesses to help”.</i></p> <p>c. King County recognizes the importance of the equestrian cluster for its diversity of business and recreation related operations which combine to provide jobs and income opportunities within the rural economy. The county will continue to work with equestrian related organizations on business and recreation aspects of the equestrian cluster and with organizations that represent the various trail user groups to help ensure the continued viability and economic health of equestrian and related recreation businesses.</p> <p>d. King County is committed to ensuring that all economic development,</p>	<p>See previous comments regarding the County’s capacity for economic development planning.</p>

GREEN VALLEY LAKE HOLMES ASSOCIATION – POSITION PAPER REGARDING PROTECTION OF RURAL WELLS AND SPRINGS (PRIVATE AND CLASS B WATER SYSTEMS)	
COMMENT	RESPONSES
<p><i>From: Judy Carrier (Officer at Large). E-Mail: GVLHAssn@gmail.com</i> <i>Sent: 5/26/2015 9:18 PM (Position Paper Date: September 21, 2014)</i></p> <p>SITUATION: Our concern is the protection of rural wells and springs. After several years of pleading with Washington State and King County agencies, we feel our water systems are still vulnerable.</p> <p>Since 2011, a number of rural residents downstream of Black Diamond have been involved in the public review of the massive development projects wherein upwards of twenty-thousand new residents will be added to the small rural town of Black Diamond. In addition, the adjacent Reserve at Woodlands King County development project will add seventy-seven homes with individual septic systems and a lake-sized storm water detention pond servicing both developments.</p> <p>Soliciting State and County agencies to protect our rural water systems from these development impacts resulted in little or no help. Their answers included: we don't have budget, or it's not our responsibility. A small Class B system, whose neighbor plumbed into their main water line, received similar answers when requesting assistance. To compound the problem, in the spring of 2014, without thorough studies and without informing rural residents of potential impacts to their drinking water systems, King County pumped flood waters from Horseshoe Lake into a gravel pit instead of an engineered storm water detention pond. Such large scale urbanization with major clear cutting, septic tanks, and urban chemical leaching into soils clearly could have significant impact on ground water flows and put at risk our rural wells and springs. Adding the periodic threats of smaller actions further increases these risks.</p> <p>Despite being comprehensive and well-intended, current state and county laws are inadequate to protect private and Class B water systems. For example, in state law chapter 246-291 WAC, there is no water system plan to protect our rural water systems beyond a small protective radius around the water source. King County Title 13 and other regulations and programs do not provide for specific protections for rural water systems receiving ground water from surrounding lands that may be</p>	<p>Comments and research noted.</p> <p>Water and Land Resources and PSB Staff worked collaboratively with the members of the Green Valley/Lake Holms Association to develop the policy language in Policy E-497. We believe it addresses the concerns raised by Ms. Carrier in her comment.</p>

affected by development.

Without assurances of protection and full mitigation we feel vulnerable and fear violation.

PROPOSALS: To receive assurance our essential rural wells and springs are protected from decreased quality or quantity by any land use change or water resource activity, we propose the following:

Risk assessment using best science: In any land use change or water resource activity approval process, there should be a condition included to identify and provide periodic impartial risk assessments, using best science techniques, for the rural water systems which could be affected by the proposed action. Depending on the level of risks, appropriate quality and quantity monitoring should be conducted plus potential impact mitigation identified, e.g., water purification systems or alternative water sources.

Communication and coordination with rural property owners: Early in the approval process, all rural property owners whose wells or springs could be affected by the proposed action should be notified and involved when addressing potential risks and when considering associated monitoring and mitigations. Ongoing property owner support should be provided by coordinated and funded government agencies with well-defined and communicated responsibilities, so rural property owners know where to go for assistance with water issues.

REQUEST: We request that the Growth Management Act, the County and City Comprehensive Plans, and associated regulating documents be updated per our proposals and adhered to meticulously--the goal being to maintain the distinct character of our rural areas and to protect our chosen rural life style.

GREEN VALLEY LAKE HOLMES ASSOCIATION – SUPPORT FOR GMVUAC RECOMMENDATIONS ON CH. 8	
COMMENT	RESPONSES
<p><i>From: GreenValleyLakeHolmAssn [mailto:gvlhassn@gmail.com]</i> <i>Sent: Friday, September 04, 2015 5:28 PM</i></p> <p>The Green Valley/Lake Holm Association (GV/LHA), part of the SE King County Community Service Area, has been working on recommendations for the KCCP 2016 Update concerning policies that affect our area. We are in communication with the Greater Maple Valley Unincorporated Area Council from whom you have received many well-considered and researched recommendations. Our organizations are in close proximity and have some similar concerns.</p> <p>The GV/LHA has reviewed and discussed the GMVUAC’s recommendation, concerns, and notes for policy F-274 (KCCP Ch.8—Services, Facilities, & Utilities, Section II. Facilities and Services at K. Surface Water Management (attached). This policy (as well as many, many others) contains language for the protection of the county’s rural areas. With those numerous references in mind, the GMVUAC’s recommendations for both F-274 and KCC 21A.08.060 A. Government/Business Services and Land Uses in <u>Specific Land Use—Utility Facility</u> are critical.</p> <p>In 2014, King County entered into a development agreement concerning Yarrow Bay’s Reserve at Woodlands development in <u>the GV/LHA area</u> in the <u>unincorporated area</u> west of Yarrow Bay’s vast (4,800 units) The Villages MPD in Black Diamond. Because of the existing KCCP and KCC language, a key part of that agreement is to allow the developer to build <u>a regional stormwater detention facility (40-acre “footprint”)</u> to receive occasional flood waters from the rural Horseshoe Lake neighborhood, but, <u>more importantly to Yarrow Bay and more critical for the GV/LHA area</u>, the much greater volume of stormwater from The Villages and The Reserve at Woodlands. This was estimated by King County and Yarrow Bay to be about a 10% Horseshoe Lake/90% Yarrow Bay split.</p> <p>Our Association supports the concerns and recommendations the GMVUAC has provided for F-274 to prevent urban or primarily urban-serving facilities such as this from setting a precedent elsewhere in the Rural Area.</p> <p>Respectfully, Gwyn Vukich, President</p>	<p>Water and Land Resources Division and the Office of Performance, Strategy and Budget staff met with community members from the Green Valley/Lake Holm Association to develop the language in policy F-274. We believe that the policy language as proposed addresses the concerns expressed by the community.</p>

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KEN KONIGSMARK –URBAN GROWTH AREA BOUNDARY CHANGES, SNOQUALMIE INTERCHANGE AREA ZONING STUDY	
COMMENT	RESPONSES
<p><i>From: kenkonigsmark [mailto:kenkonigsmark@yahoo.com]</i> <i>Sent: Saturday, October 24, 2015 9:33 AM</i></p> <p>My comments relate to all requests for upzoning or movement of parcels into the UGA. As a matter of policy, King County should NOT approve any such requests simply because an owner or entity wishes to gain significant increased value for their property through zoning changes.</p> <p>Instead, given existing King County programs such as 4:1 and Transfer of Development Rights, NO free upzones or UGA additions should be approved except through use of these programs. That is the purpose of having these programs. Landowners should be required to utilize these programs if they wish to change their zoning or UGA status.</p> <p>Specifically, docket request #7 by the City of Snoqualmie, which was similarly requested and rejected four years ago, should not be considered again unless there is a specific proposal to employ the 4:1 and/or TDR programs as the method for adding these parcels to the UGA. Further, any proposed change must be required to protect the visual quality of the Mountains to Sound Greenway corridor so that no urban or retail development or advertising signage is seen from the SR-18/I-90 interchange.</p>	<p>Comments noted. Revisions to the Urban Growth Boundary are mitigated through Four to One transactional dedications of permanent open space. Unmitigated UGA changes are not included in the 2016 Plan.</p> <p>Comments noted. These are consistent with the recommendation in the Area Zoning Study and Docket Report.</p>

KING COUNTY AGRICULTURAL COMMISSION – DOCKET REQUEST # 13 (WOODINVILLE AREA)	
COMMENT	RESPONSES
<p><i>From: Barrentine, Patrice (King County Staff to Agricultural Commission)</i> <i>Sent: Wednesday, September 23, 2015 5:03 PM</i></p> <p>Re: Zante's request to rezone from APD to City of Woodinville</p> <p>Commission does not support this request</p> <ul style="list-style-type: none"> • While the letter says it is not commercially farmed, it is currently farmed by several farmers • This property has an active farm stand where produce is sold to the public • Is it in Current Use Tax Incentive Program? Yes, Ted Sullivan checked and it is meeting commercial farming requirements for this incentive. • Commission states that this property is viable for agriculture and states the letter has several inaccuracies. • Numerous farms in King County are viable at this size by direct marketing • Recommend contacting 21 Acres for their comprehensive plan <p>Attachments.</p>	<p>Comments noted. These are consistent with the recommendation in the Docket Report.</p>

KING COUNTY RURAL FOREST COMMISSION – MULTIPLE TOPICS (FORESTRY)	
COMMENT	RESPONSES
<p><i>From: Vane, Linda (King County Staff to Commission)</i> <i>Sent: Thursday, December 31, 2015 12:03 PM</i></p>	

KING COUNTY RURAL FOREST COMMISSION – MULTIPLE TOPICS (FORESTRY)			
COMMENT			RESPONSES
Chapter 3: Rural Area and Natural Resource Lands			
RFC comments	Edits	Staff comments	
<p>R-336 p. 3-27, bottom of page</p> <p>a) Add the words “<u>and encourage</u>”</p> <p>b) See comment on R-636 above.</p>	<p>R-336 King County shall continue to support the rural development standards that have been established to protect the natural environment by addressing seasonal and maximum clearing limits, impervious surface limits, surface water management standards that emphasize preservation of natural drainage systems and water quality, groundwater protection, and resource-based practices. These standards should be designed to provide appropriate exceptions for lands that are to be developed for kindergarten through twelfth grade public schools and school facilities, provided that the school project shall comply at a minimum with the requirements of the King County Surface Water Design Manual. Stormwater management practices should be implemented that emphasize preservation of natural drainage systems, protect water quality and natural hydrology of surface waters and groundwater. Rural development standards should also, where feasible, incorporate and encourage Low Impact Design principles for managing stormwater onsite by minimizing impervious surfaces, preserving onsite hydrology, retaining native vegetation and forest cover, capturing and reusing rainwater, controlling pollution at the source, and protecting groundwater. King County shall take care that requirements for onsite stormwater management complement requirements for onsite wastewater management.</p>	<p><u>Edit proposed by staff based on commissioner comment (L. Vane)</u></p> <p>b) Add the words “<u>and forest cover</u>” per commissioner comment on R-636 above.</p>	<p>Comments noted. Edits made in 2016 Plan that are consistent with the recommendations, as revised by DNRP staff, suggested by the Rural Forest Commission.</p>

KING COUNTY RURAL FOREST COMMISSION – MULTIPLE TOPICS (FORESTRY)			
COMMENT		RESPONSES	
<p>p. 3-44, R-622 and associated narrative</p> <p>Comments:</p> <p>a) Language encouraging KC collaboration with Mt. Baker-Snoqualmie National Forest land managers should be strengthened.</p> <p>b) Add “other public values present on our public forests such as water storage, recreation” ...i.e., “multiple values.”</p>	<p>a) p. 3-44, first paragraph of narrative preceding R-622</p> <p>About 70% of the FPD is in public ownership, including parts of the Mt. Baker Snoqualmie National Forest, including wilderness areas, state and county parks, Washington State Department of Natural Resources (WDNR) lands, and watersheds for the cities of Seattle and Tacoma. Public land management affects the region’s economy, recreation, fish and wildlife habitat, forest health, stream flows, water supply, flood control and climate change mitigation capabilities. <u>The county should take advantage of opportunities to collaborate with public land managers such as the Forest Service at Mt. Baker-Snoqualmie National Forest, and other stakeholders, to manage forests for multiple public values.</u></p> <p>b) R-622 King County recognizes the many values provided by the public forestland in the county, and encourages continued responsible forest management on these lands. King County should collaborate with other public land managers in planning for the conservation, use, and management of forest resources on public lands <u>for multiple public values.</u></p>	<p>Edit proposed by staff based on commissioner comment (L. Vane)</p> <p>a) Note that R-622 references the “many values” listed in the introductory paragraph shown in a).</p>	

KING COUNTY RURAL FOREST COMMISSION – MULTIPLE TOPICS (FORESTRY)			
COMMENT		RESPONSES	
<p>p. 3-45, last paragraph Change acreage to: <u>116,790</u> acres</p>	<p>Much of the 116,790 <u>93,000</u> acres of forestland managed by WDNR in King County are trust lands that raise <u>generate</u> income from the sale of timber and other resources <u>for the beneficiaries, such as schools, universities and counties.</u> and <u>These lands</u> also provide wildlife habitat and recreational opportunities are heavily used for recreation.</p>	<p>Per Doug McClelland, WDNR</p>	
<p>p. 3-48, R-636 Comments: Make sure are consistent in references to forest functions and values and soil health throughout Comp Plan. Include forest cover, healthy soils as components of stormwater management. Compare to the language used in Ch.5, p. 5-3 below.</p>	<p>R-636 King County promotes forest management that achieves long-term forest health; protection of watersheds, critical areas and habitat to support fish and wildlife populations; protection of threatened and endangered species; <u>management of stormwater runoff and associated pollutants</u>; conservation and economic viability of working forests; carbon sequestration and reduction in greenhouse gas emissions; and adaptation to climate change.</p>	<p>No additional change needed in R-636. The subject of this policy is promoting forest management and the many benefits achieved thereby. A representative list seems OK here to me. <i>(L. Vane)</i></p>	

KING COUNTY RURAL FOREST COMMISSION – MULTIPLE TOPICS (FORESTRY)			
COMMENT		RESPONSES	
<p>p. 3-50, top of page, following R-641</p> <p>Add the words “<u>and sequestration</u>.”</p>	<p><u>King County’s 2015 Strategic Climate Action Plan calls for the county to manage and restore its forested parks and natural lands in ways that maximize biological carbon storage and sequestration and increase resilience to changing climate conditions. To help guide forest management activities, in 2012 the Parks Division completed an initial assessment of the forest types on all of Parks’ forested acreage. Additional assessment will continue to be conducted on newly acquired forested properties as well. Parks will develop and implement stewardship plans on all forested properties of 200 acres or more in size, which will result in healthier and forests that are more resilient to climate change. The Parks and Water and Land Resources Divisions will also continue to develop opportunities for volunteers to plant native trees and shrubs and remove invasive species from County-owned lands and have established an ambitious goal for the planting of new trees in the county.</u></p>		
Chapter 5: Environment			
RFC comments	Edits	Staff comments	
<p>p. 5-3</p> <p>Comment: See comment on R-636 above, where the language used in this section is praised.</p>	<p>p. 5-3, 3rd paragraph</p> <p>New approaches for stormwater management that mimic the natural functions of soil and forest cover in slowing and filtering stormwater runoff, known as Low Impact Development (LID) techniques, are providing additional options for stormwater management, especially in site development. In conjunction with a comprehensive stormwater management program of structural controls and best management practices, LID techniques can result in reduced impacts from stormwater runoff and protection of the ecological functions of the landscape and surface waters. LID techniques work in tandem with</p>		

KING COUNTY RURAL FOREST COMMISSION – MULTIPLE TOPICS (FORESTRY)			
COMMENT			RESPONSES
	<p>structural controls and other best management practices to meet other objectives such as retention of canopy cover, riparian habitat and native soils that help protect biodiversity, improve air quality, and create a better and more sustainable environment and quality of life for King County citizens. <u>Low Impact Development Best Management Practices can mimic the natural functions of soil and forest cover in slowing and filtering stormwater runoff by infiltrating or dispersing stormwater onsite, or by capturing and reusing it. Used exclusively, or in conjunction with a comprehensive stormwater management program of structural controls and other best management practices. Low Impact Development Best Management Practices can reduce environmental impacts from stormwater runoff. Low Impact Development techniques also work in tandem with other strategies like retaining forest cover, preserving native plants and preserving native soil. These techniques help to meet other objectives such as retention of canopy cover, protection of riparian habitat and preservation of native soils that help protect biodiversity, improve air quality, and protect the ecological functions of the landscape and surface waters. These approaches help create a more sustainable environment and create a better quality of life for King County residents.</u></p>		
Chapter 7: Parks and Cultural Resources			
RFC comments	Edits	Staff comments	

KING COUNTY RURAL FOREST COMMISSION – MULTIPLE TOPICS (FORESTRY)			
COMMENT		RESPONSES	
<p>p. 7-9, Forestland section intro and P-116</p>	<p>p. 7-9 Forestland</p> <p>One element of the King County Forestry Program is the conservation of forestland through acquisition to allow continued forest management on the property. One goal of the King County Open Space System is the conservation of forestland through acquisition of land or conservation easements to decrease threat of conversion resulting from development and fragmentation, as well as promote the understanding of the importance of forest management, including restoration of the forests to more natural conditions. The working forests owned by King County are generally very large parcels of land (several hundred acres or more) that support sustainable forest management practices and contribute to the retention of a contiguous forest. These properties contribute to environmental protection, high-quality passive recreation, the public understanding of forestry, and scenic vistas. These properties contain valuable fish and wildlife habitat, provide environmental services (such as stormwater management, clean air/water and carbon sequestration), help mitigate the impacts of climate change as well as provide high-quality passive recreation, scenic vistas and educational/interpretation opportunities.</p> <p>P-116 <u>Working forest land and conservation easements</u> owned by King County shall provide large tracts of forested property in the Rural Forest Focus Areas, and the Forest Production District (FPD) <u>and Rural Area</u> that will remain in active forestry, protect areas from development or provide a buffer between commercial forestland and adjacent residential development.</p>		
Chapter 12: Implementation, Amendments and Evaluation			
RFC comments	Edits	Staff comments	

KING COUNTY RURAL FOREST COMMISSION – MULTIPLE TOPICS (FORESTRY)		
COMMENT		RESPONSES
<p>Comment: Make it clear that a Resource land use change would also be considered substantive and subject to the 4-year cycle. E.g., a change in the FPD boundary.</p>	<p><i>Deletes 2012 amendment to allow Reserve Silica mine site development pilot project.</i> <i>Purpose: Further defines what can be done in the annual Comp Plan cycle</i></p> <p>I-203 Except as otherwise provided in this policy, the annual cycle shall not consider proposed amendments to the King County Comprehensive Plan that require substantive changes to comprehensive plan policies and development regulations or that alter the Urban Growth Area (UGA) Boundary. Substantive amendments and changes to the UGA Urban Growth Area Boundary may be considered in the annual amendment cycle only if the proposed amendments are necessary for the protection and recovery of threatened and endangered species, or to implement</p> <p>a. A proposal for a Four-to-One project; or b. Changes related to a mining site conversion demonstration project. The demonstration project shall evaluate and address:</p> <ol style="list-style-type: none"> 1. potential options for the use of a reclaimed mine site, including the feasibility of residential use and/or long-term forestry on the demonstration project site; 2. the impacts to carbon sequestration as a result of reforestation, and for residential use, the impacts to carbon sequestration when implementing modified standards for lot clustering or transfer of development rights; 3. the need for a site design that compatibly integrates any proposed residential development on the demonstration project site with uses occurring on the adjacent rural or forest production district lands, especially if the proposed residential development utilizes modified standards for lot clustering and/or transfer of development rights; 4. the levels and standards for reclamation of mining sites that are appropriate to their use either for long-term forestry and/or for residential development; and 5. the need to ensure that the demonstration project provides an overall public benefit by providing permanent protection, as designated park or open space, of lands in 	

KING COUNTY RURAL FOREST COMMISSION – MULTIPLE TOPICS (FORESTRY)			
COMMENT			RESPONSES
	<p>the vicinity of the demonstration project site that form the headwaters of critical, high valued habitat areas; or that remove the development potential from nonconforming legal parcels in the forest production district; or that provide linkages with other forest production district lands.</p>		
	<p>Attachment: Area Zoning Studies (excerpts)</p>		
<p>Comment: Q&A. Agreed. Was zoned to protect</p>	<p>Area Zoning Study #4 - Allison SDO Removal Request Recommendations: Remove this condition from the Allison property and the application of this SDO to the other three RA-5 (SO) zoned properties south of I-90. In practical terms, this will affect only the</p>		

KING COUNTY RURAL FOREST COMMISSION – MULTIPLE TOPICS (FORESTRY)			
COMMENT			RESPONSES
forestland; remove special overlay.	Allison property because it has additional development potential and the others are already developed.		
Comment: Discussion: KC should consider rezoning forested land along the interchange to Forest. The public has invested a lot of \$ in the area to retain forests and forestry use.	Area Zoning Study #6 - Snoqualmie Interchange Recommendation: Do not expand the Urban Growth Area at this site as it does not meet a number of the existing policies.		
Comment: Q&A. No one disagreed.	Area Zoning Study #13 - North Bend Urban Growth Boundary Expansion Recommendation: Do not expand the UGA boundary at this time, but consider a Four-to-One proposal should the property owner(s) apply.		
Comment: Was zoned to protect forestland; remove special overlay – recommend yes	Taylor Mountain Forest Area Zoning and Land Use Study This is an internal request to rezone ten parcels within King County Parks' Taylor Mountain Forest from RA 10, and one parcel from RA-5, to F zoning and include those parcels in the Forest Production District. Two parcels will have their land use category changed from "Rural		

KING COUNTY RURAL FOREST COMMISSION – MULTIPLE TOPICS (FORESTRY)		
COMMENT		RESPONSES
	Area" to Open Space, consistent with the land use on the remaining parcels.	
	Other comments/questions (not chapter-specific)	
RFC comments	----- <i>Staff comments and edits (L. Vane)</i> -----	
<p>Comment: Make sure there is an overarching policy regarding Integrated Pest Management (IPM) in the Comp Plan. There does not seem to be one.</p>	<p>LV emailed staff proposed edits to John Taylor with cc' to Ivan Miller 12/10/15.</p> <p>WLRD and Parks staff collaborated on the following proposed edits:</p> <ol style="list-style-type: none"> 1) Chapter 3 Rural Area and Resource Lands – Add to II.B.1. Forestry, g.: <ul style="list-style-type: none"> g. Provide education and assistance in the control of noxious and invasive weeds, including information on integrated pest management in accordance with the best management practices established by the King County Noxious Weeds Program. 2) Create an overarching IPM policy in Chapter 5 Environment by moving existing IPM policy E-505 from the 'Erosion Hazard Areas' section to follow E-430 in Part IV.3.h. Non-Native Species and add a sentence as shown: <p>E-430 King County shall implement its strategy to minimize impacts of noxious weeds to the environment, recreation, public health and the economy on all lands in the County. This includes preventing, monitoring and controlling infestations of state-listed noxious weeds and other non-native invasive weeds of concern on county-owned and managed lands.</p> <p>E-505xxx Through training and other programs, King County should actively encourage the use of environmentally safe methods of vegetation control. Herbicide use should be restricted to low toxicity products applied by trained</p> 	

KING COUNTY RURAL FOREST COMMISSION – MULTIPLE TOPICS (FORESTRY)		
COMMENT	RESPONSES	
	<p><u>and licensed staff or contractors, and unnecessary use avoided.</u></p> <p>King County should be a good steward of public lands and protect water quality, by reducing the use of insecticides, herbicides and fungicides through the use of integrated pest and vegetation management practices.</p> <p>3) Chapter 7 Parks – Add new policy P-128b that reiterates the IPM policy SO-112 in the Parks Division’s Open Space Plan:</p> <p><u>P-128 b Use of pesticides and fungicides will be based on integrated pest management principles.</u></p>	
<p>Comment: Make sure concepts of stewardship & incentive-based programs for private landowners are strong throughout the document on a policy level.</p>	<p>L. Vane comment:</p> <p>Note that the Rural Forest Commission and Forestry staff made extensive edits to the stewardship and incentives content in Chapters 3 and 5 during the 2012 Comp Plan update process.</p> <p>There are numerous references to stewardship and incentives for private landowners in Chap. 3 Rural Area & Resource Lands and Chap. 5 Environment. E.g., in Chap. 3 see pages 3-10 to 3-11 and paragraph preceding R-335 on page 3-27.</p> <p>Also, there is an extensive discussion of the county’s “integrated approach” to environmental protection efforts, beginning on p. 5-4, Chapter 5, which includes financial incentives and free technical assistance to encourage stewardship of private lands.</p>	
<p>Question: Has there been any movement on</p>	<p>L. Vane comment:</p> <p>Yes, there has been progress on this point. I have had a number of discussions with Parks staff on this. Parks had also identified Four-to-One policies as needing review and possible updating. Parks staff developed revisions to the criteria for evaluating open</p>	

KING COUNTY RURAL FOREST COMMISSION – MULTIPLE TOPICS (FORESTRY)		
COMMENT		RESPONSES
<p>identifying high conservation value lands to consider in Four-to-One projects? This was discussed at commission meetings.</p>	<p>space that have been under internal discussion for some time. They intend to have decided on a course of action by the first week of January. Connie Blumen has taken the lead on this and Monica Leers has been involved. Ultimately the approach is likely to involve process improvements at DNRP and DPER as well as changes in the criteria for evaluating proposals.</p> <p>Note: Four-to-One Program policies are included in Chapter 2 Urban Communities. See pp. 2-32 to 2-34 of the Public Review Draft. Policies U-186 and U-187 outline the criteria for evaluating open space in Four-to-One proposals.</p>	

TONY KUSAK – NORTH BEND AREA ZONING STUDY		
COMMENT		RESPONSES
<p><i>From: Tony Kusak, SIOR [mailto:Tony.Kusak@comre.com]</i> <i>Sent: Thursday, October 01, 2015 1:41 PM</i></p> <p>RE: Comments to King County Comprehensive Plan Update (2016) Review of Land Use Designations and Implementing Zoning Kusak Family Trust Property, North Bend, Washington</p> <p>As the owners of the Kusak Family Trust Property, we would like to thank you for your letter dated July 1, 2015 regarding our parcels located near North Bend, Washington.¹</p> <p>[¹ 2223089049, 2223089019, 2223089002, 2223089026, 2223089055, 1523089018, 1523089147, 1523089039, 1523089132, 1523089194, 1523089170, 1523089019, 1523089124, and 1523089133]</p>		<p>Comments noted. We appreciate your interest in development of this property. Your comments raise a number of important and relevant points.</p>

TONY KUSAK – NORTH BEND AREA ZONING STUDY	
COMMENT	RESPONSES
<p>The Kusak family is interested in developing these parcels, and we are supportive of converting these parcels from rural to urban. Reviewing the current land use designations and implementing zoning in anticipation of the 2016 King County Comprehensive Plan updates is very timely and we appreciate the opportunity to comment.</p> <p>Converting these family parcels from rural to urban will enable a development pattern consistent with the surrounding area and the long-range plans of the City of North Bend. The parcels immediately to the north and east of our land in the city of North Bend are currently zoned Low Density Residential 4 Units/Acre, whereas our zoning currently allows for one home for every 5 acres, which results in an inconsistent growth pattern. A continuation of North Bend's growth pattern better serves its citizens and the City, especially where the south fork of the Snoqualmie River constitutes a natural barrier on the south side of the property.</p> <p>The current north boundary line (Interstate 90) provides access to the area and abuts the Cascade Golf Course, an existing activity area for residents. The close proximity to Interstate 90 supports the regions and the city of North Bend's traffic policies by locating growth near transportation. These parcels are located in the southwest quadrant of the I-90/436th Avenue S.E. interchange. All other quadrants of this interchange are inside the North Bend city limits. Sanitary sewer is available just north of the freeway in the city of North Bend and all quadrants are served with public water by Sallal Water Association. The close proximity of these utilities as well as the adjacent city limits makes this property an ideal candidate for conversion to urban uses, while the natural barrier of the river on the south line also represents a natural logical limit to the proposed annexation.</p> <p>The City of North Bend recently stated that "annexing raw land appears to be more desirable for the City than annexing populated areas with failing infrastructure or a high demand for operating services such as public safety."²</p> <p>[² North Bend City Council Agenda Packet, June 17, 2014, pg 114.]</p> <p>When annexing raw land, the City also has the opportunity to collect water, sewer, and storm drainage general facility charges to help build the infrastructure required. Increased density will distribute the costs associated with facility extensions, making the expansion of any necessary infrastructure more feasible</p>	<p>The Area Zoning Study identifies that the properties are eligible, if combined with those to the immediate north (i.e., the Golf Course) for a Four to One application. The Area Zoning Study also identifies, preliminarily, some of the County's interests were a Four to One application to be submitted.</p>

TONY KUSAK – NORTH BEND AREA ZONING STUDY	
COMMENT	RESPONSES
<p>and cost effective if done in conjunction with an annexation to a higher density.</p> <p>Revising the current designation is also consistent with King County Planning Policies, which explicitly address unincorporated areas as directed by the Growth Management Act. The proposed revision promotes the annexation of all unincorporated areas within the urban growth boundary within 20 years and creates a compact development with dedicated open spaces. The subject properties are generally free of critical areas other than the required buffer along the south fork of the Snoqualmie River, which can be preserved as permanent open space for the public benefit when the property is developed after annexation. This proposed dedication of permanent open space to the King County Open Space System permanently preserves a high quality habitat with critical areas and unique features along the Snoqualmie River.</p> <p>The Kusak family is looking forward to working with King County and the City of North Bend to evaluate potential development options for the property through the annexation and rezoning process. Thank you for the opportunity to provide our comments on the proposed King County Comprehensive Plan Update.</p> <p>Sincerely,</p> <p>Chuck Kusak Trustee Chuck@kusak.com</p> <p>Jim Kusak Trustee Jim.Kusak@gmail.com</p> <p>TK/ps , 17503c.002 , enc: As Noted</p> <p>cc: Mr. Tony Kusak, Cushman & Wakefield King County Council Mr. Ivan Miller, King County Office of Performance, Strategy and Budget Ms. Karen Wolf, King County Office of Performance, Strategy and Budget</p>	

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MICHAEL MAGNANI – DOCKET REQUEST #5	
COMMENT	RESPONSES
<p><i>From: Michael Magnani [mailto:mdmagnani@outlook.com]</i> <i>Sent: Monday, October 05, 2015 8:46 PM</i></p> <p>Dear King County Council,</p> <p>Our region’s vibrant economy has led to a growing and affluent population and along with that, a need for new (and affordable) housing and services. Much of King County is faced with a difficult balance of supporting a growing population and trying to accommodate the desire of residents to maintain the character of existing neighborhoods. I moved to the Lake Kathleen neighborhood in East Renton in the spring of 2013. East Renton has some of the last undeveloped land that also boasts a short commute to Seattle and Bellevue. Since I moved in, I have witnessed East Renton and the surrounding areas significantly grow and change for the positive, but I am concerned that the proposal in Docket #5 for the 2016 King County Comprehensive Plan is not compatible with the recent evolution in the East Renton. I empathize with the petitioner about maintaining the character of East Renton and preventing fractured neighborhoods, but I also think that we need to find a way to balance those issues with the inevitable growth. I am concerned about a potential lack of foresight in the proposal. The proposal does not seem to recognize the recent and future growth in East Renton or the impact that this growth will have on the neighborhoods and the need for additional services to support a growing population. As a result, I would like to make a counterproposal to Docket #5:</p> <ul style="list-style-type: none">• Expand the Urban Growth Area to all neighborhoods with a Renton address• Rezone all property that is currently zoned RA-5 to R-4, recognizing that much of the land cannot or will not be developed for various reasons• Grandfather land use practices allowed under RA-5 zoning and existing minimum lot size	<p>Comments noted.</p> <p>This comment raises interesting and relevant issues. While Docket Request #5 is denied, the 2016 Plan includes a Workplan item to engage</p>

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<p>requirements associated with the corresponding land use practices to those areas that are being rezoned to R-4</p> <ul style="list-style-type: none"> • Explore annexation into Issaquah and Newcastle, in addition to Renton, to provide the adequate levels of services that are needed by a growing population as well as the amenities that can and should be provided for more densely populated areas <p>Docket #5 proposes moving the Urban Growth Area back to the current Renton City Limits, but recent and future growth suggest that the Urban Growth Area should be expanded rather than contracted. As such, it seems logical to expand the Urban Growth Area to cover all neighborhoods with a Renton address. The expansion would cover a relatively small area overall (mainly May Valley and Lake Kathleen), but could provide new opportunities to meet the demand for housing. The proposal in Docket #5 references the last vote to annex the Urban Growth Area into the Renton City Limits, which occurred in 2007. The measure did not pass at that time, but a lot has changed in nearly a decade. The affordability of housing is on the minds of many residents in King County as they see the median sales price of houses in the county at approximately \$500,000. Many worry that the region may face a housing affordability crisis.</p> <p>In the last two years, I have watched a significant amount of undeveloped land in the area turn into new neighborhoods with what many would consider expensive houses. While these new houses are out of the reach of many, increasing the supply of homes should help temper the rise in prices in existing homes and help maintain housing affordability for as much of the population as possible. The proposal of Docket #5 to contract the Urban Growth Area would reduce the development of new neighborhoods, which may be appealing to some existing residents, but would likely worsen the affordability of housing in the region by limiting the supply as demand for housing continues to increase. Expanding the Urban Growth Area would provide significant benefits, but rezoning certain portions of East Renton would need to accompany that expansion to provide any meaningful benefit.</p> <p>Currently, the portion of East Renton outside of the Urban Growth Area is zoned RA-5 (one dwelling unit per five acres), but a change to R-4 (four dwelling units per acre) zoning could likely be achieved without destroying the character of the areas, which is most residents' top concern. Much of the undeveloped land in the area is either wetlands or hillside that would be difficult, if not impossible, to build on. Additionally, many houses in East Renton were built prior to current zoning laws. The houses were built on relatively small lots that are more consistent with R-4 zoning. The size of lots created under R-4</p>	<p>in discussions with King County cities to revisit the Potential Annexation Area map and annexation countywide planning policies. The issues you raise are likely to be part of this future project.</p>

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<p>zoning is still large, relative to many of the new housing developments around the Puget Sound region. Setback requirements further ensure that lot sizes will be larger than average. The change in zoning would concern residents who have livestock. It seems like a practical solution to grandfather the land use practices allowed under RA-5 zoning and the existing minimum lot size requirements associated with the corresponding land use practices to the areas that are rezoned. This would allow and encourage people to continue to raise livestock if they so desire so the area can maintain its character, even as new houses are built. The combination of these factors ensures that a zoning change will have a much smaller impact on the area than most people would expect. Even so, the population of the area will continue to grow as will the need for the additional services and amenities that annexation into one of the nearby cities could provide.</p> <p>As the boundaries of the Urban Growth Area exist today, Renton is the only logical choice for annexation, but expanding the Urban Growth Area to cover a larger area could open up the opportunity to annex into Newcastle or Issaquah instead, since the boundaries of the expanded Urban Growth Area would be contiguous to the boundaries of Issaquah and Newcastle. Some residents fear that incorporating into Renton, with its residential urban feel would erode the rural character of East Renton over time. Some residents may be concerned that the big city problems of Renton, such as higher crime rates, could spread to East Renton. Whether or not these are valid concerns, the top concern of East Renton residents is what annexation would mean for their children who attend Issaquah schools. Incorporating into Issaquah would assuage all of those concerns. Issaquah boasts a small-town-feel that is consistent with the rural character than many residents love about East Renton and would eliminate any concerns over school district boundaries. Annexation into Issaquah would also be practical from an economic perspective, since many East Renton residents do their shopping and errands in Issaquah. That same logic also makes Newcastle a possibility. Even if annexation into Issaquah is not a possibility, Newcastle shares many similarities with East Renton due to the rapid population and housing growth that both areas are experiencing. Perhaps it makes sense to pair up the communities and allow them to grow together. If it turns out that annexation into Issaquah or Newcastle is not practical, annexation into Renton for the entire expanded Urban Growth Area should still be considered, because of the need for services to support a growing population.</p> <p>Recently, East Renton has grown significantly, almost as if it is anticipating an eventual annexation by the city of Renton, which is why I am so concerned with Docket #5's proposal to move the Urban Growth Area back to the Renton City limits. In time, the growth of the area will mean that residents require more</p>	

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<p>services and more amenities, and the current arrangement with King County may not be able to satisfy those needs. King County has done an excellent and admirable job providing police, fire and road services, but eventually a population grows to a certain size and density that they need more than just the basic necessities and East Renton is approaching that point. Cities like Renton or Issaquah have the experience and resources to provide the necessary services to support the area as the population density grows. Annexation would improve the services and reduce costs for most residents since the cities would be better equipped to provide services to a growing population. Those services may include better transportation options, lower costs for services such as garbage and increased recreation options. Annexation would have a positive impact on the area, but it needs to be inclusive of all residents of East Renton. If the current Urban Growth Area was annexed, without the expansion of the Urban Growth Area I proposed earlier, it would have a significant adverse impact on the residents of May Valley and Lake Kathleen, who live just outside the Urban Growth Area. The remaining unincorporated area would lose its most densely populated area, and as a result, lose its negotiating power and economies of scale to provide favorable rates for services like garbage. Police response times would likely be reduced for residents as well, since the concentration of the population within the patrol area will move eastward. Residents of May Valley and Lake Kathleen may also see a decline in services such as road maintenance or increases in taxes, since significant tax revenues would be lost. It is important to provide the services that residents need, but it has to be ensured that all residents of East Renton have the opportunity to benefit from the growth in the area.</p> <p>Looking towards the future, it will be a challenge to provide enough housing to support the vibrant economy and growing population, maintain the quality of existing services and provide new services to allow residents to enjoy the high quality of life in western Washington. We need more housing and we need to acknowledge the growth that has already occurred and the growth that will continue into the future. Part of that acknowledgement needs to include providing big city services to the residents of East Renton. At the same time, we also need to listen to residents' concerns about losing the character of their neighborhoods. The proposal of Docket #5 to move the Urban Growth Area back to the Renton City Limits will only worsen many of the problems that East Renton residents and the population of King County may encounter in the next few years. To proactively address the likely issues before they occur, I believe it is worth evaluating my counterproposal. Expanding the Urban Growth Area in East Renton, rezoning rural areas to allow for higher population densities, annexation of the expanded Urban Growth Area in to nearby cities, and grandfathering current land use practices can address the concerns of residents and the challenges the region will face in the next few years. I hope these proposal and my</p>	

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insights are valuable as you look to plan for the future. Please let me know if you have any questions. Thank you very much for your time.	

BONNIE MORRISON – CARNATION AREA ZONING STUDY	
COMMENT	RESPONSES
<p><i>From: Bonnie Morrison [mailto:bon@bonniestlc.com]</i></p> <p><i>Sent: Monday, November 09, 2015 8:02 AM</i></p> <p>I live adjacent to a rural, farm property just outside Carnation, newly purchased by Millionaire Gary Remlinger. The land he bought borders the town on Carnation on the North side. We have submitted a petition to stop development of the remaining farm lands in the area, which he is pushing to do. There are many properties already zoned for development that have not yet been used. I am desperately hoping that people in power will listen to those of us trying to preserve what has been a farming, rural area of extraordinary beauty in the Snoqualmie Valley.</p> <p>It is true that we do not have the immense finances and huge financial ability that has allowed the Remlinger family to buy up huge amounts of land surrounding Carnation. We farmers and small land owners have worked extraordinarily hard all our lives to live in this rural beauty and hope with all our hearts that big money is not allowed to change it in unnecessary ways. Please help us preserve our farm lands from developments.</p>	<p>King County strongly agrees that the preservation of farming and rural areas is a priority.</p> <p>At the same time, the conclusion of the Carnation Area Zoning Study is that the property is eligible to use the Four to One program as it is rural (not agriculture) and adjacent to the original 1994 Urban Growth Area boundary. The Area Zoning Study identifies a set of interests the County has were a proposal to be submitted.</p> <p>Please note that the Four to One program is discretionary, and the County Council will act on the proposal, and provide future opportunities for public comment if a proposal were to be submitted.</p>

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THOMAS QUIGLEY – CODE ENFORCEMENT	
COMMENT	RESPONSES
<p><i>(also, see Michael Tanksley – Code Enforcement)</i> <i>Date: Apr 30, 2015, at 3:47 PM, Thomas Quigley wrote:</i></p> <p>Mr. Garnett, I again write to you regarding the above referenced case. Unpermitted construction continues at this site, now new decks are being added to the structure. This is resulting in additional impervious coverage and is clearly a violation of code. I do not understand why a Stop Work Order has not been issued for this project and property. A walk-about the property makes it very clear that this is a commercial endeavor with multiple suites and parking for many vehicles.</p> <p>I would appreciate understanding how this is allowed to go on. It creates such pressure on our valuable agricultural resource lands because others have and will continue to develop without permitting.</p> <p>Tom Quigley, President, Olympic Nursery, Inc.</p>	<p>Please see response to <i>Tanskley – Code Enforcement</i> below.</p>

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PERRY RESNICK – RAINIER CHRISTIAN SCHOOL SITE	
COMMENT	RESPONSES
<p><i>From: Perry Resnick [mailto:pjresnickone@yahoo.com]</i> <i>Sent: Thursday, May 14, 2015 6:03 AM</i></p> <p>I understand the Christian Rainier School may submit a plan to build a high school behind the Woodside development in the area formerly a missile site. The previous plan included a stadium and creating access in two areas through Woodside.</p> <p>I am adamantly opposed to the county creating new access points through our development, which would increase through traffic.</p>	<p>As of March 1, 2016, there has been no proposal submitted in the 2016 Plan process for this property.</p>

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MICHAEL TANKSLEY (HOLLYWOOD HILLS ASSOCIATION) – CODE ENFORCEMENT (ENFR 15-0287)	
COMMENT	RESPONSES
<p><i>From: Michael Tanksley [mailto:wmtanksley@comcast.net]</i> <i>Sent: Friday, May 01, 2015 4:00 PM</i></p> <p>[DPER Code Enforcement] It should go without saying, but needs to said here, that we have now amassed quite a trail of messages that clearly shows that the County is failing to do its fundamental duty to protect the larger</p>	<p>The County has begun a study of the</p>

MICHAEL TANKSLEY (HOLLYWOOD HILLS ASSOCIATION) – CODE ENFORCEMENT (ENFR 15-0287)	
COMMENT	RESPONSES
<p>community's legal property rights and legal businesses from interests which are happy to trample on those rights, codes and zoning in pursuit of their own profits.</p> <p>I stopped by "Jacks" a few weeks ago - before the NO TRESPASSING signs went up. I spoke with an older guy in coveralls who was clearly not interested in talking about what was going on there. When I asked him what the lovely exposed wood beam and finished dry walled inside of the back barn was for, he said he didn't know - "maybe a studio or something." Never mind the 4 pending applications for liquor licenses for various businesses planned for the property.</p> <p>These people know what they are doing is illegal. And the County has essentially been supportive by not acting on the various reported violations.</p> <p>Why has this property's un-permitted construction not been red tagged? Has there been some sort of directive to stop enforcing the zoning and associated codes around here?</p> <p>The activity at "Jack's" (parcel # 1526059051) is only one of numerous egregious violations of King county zoning and codes in this vicinity. Numerous code violation reports have been filed, but with no enforcement, other similar uses are springing up like mushrooms.</p> <p>Here is a sample of four open cases in our area, filed by 3 different people. There could be many more cases, but why bother reporting them if the County won't address these most egregious examples?</p> <ul style="list-style-type: none"> - ENFR15-0287 - "Jack's" - ENFR12-0239 - Otis-Rubstello LLC's property, where Matthews winery and an illegal B&B are operating - ENFR15-0295 - illegal kitchen, wine tasting and a business office in an otherwise quiet neighborhood - not the business owners primary residence. - ENFR14-0888 - illegally stored junk vehicles and piles of material piled around the exterior and yard of a house. <p>These violations, most of which have been ongoing for years (some "closed" cases had to be re-opened as they were inexplicably closed without the problem(s) having been resolved), appear to have NO recent activity by the County nor by the owners in terms of bringing the properties into compliance.</p>	<p>wine and adult beverage industry and has hired a consultant to identify best management practices in areas such as tasting rooms, home occupations and rural/urban interface. Recommendations are expected to be transmitted to the Council in Summer, 2016. Additionally, the County has hired a consultant to identify best management practices for code enforcement and help it restructure its code enforcement function. These recommendations are also expected in Summer, 2016.</p>

MICHAEL TANKSLEY (HOLLYWOOD HILLS ASSOCIATION) – CODE ENFORCEMENT (ENFR 15-0287)	
COMMENT	RESPONSES
<p>This is our community. We live here and have great motivation in getting to the bottom of this.</p> <p>Sincerely,</p> <p>Michael Tanksley, President Hollywood Hill Association</p>	

MICHAEL TANKSLEY (HOLLYWOOD HILL ASSOCIATION) – COMMENTS ON DOCKET REQUESTS 12 TO 16	
COMMENT	RESPONSES
<p><i>From: Michael Tanksley [mailto:wmtanksley@comcast.net]</i> <i>Sent: Wednesday, October 21, 2015 9:57 PM</i></p> <p>Docket item 12 This request should be denied.</p> <p>The subject road, 140th Place NE, is a Rural road that extends along the east edge of the Agriculturally zoned Sammamish Valley with RA---2.5 parcels on the other side. It is a key element of the local Rural community and is on the front lines in our efforts to contain urban sprawl.</p> <ol style="list-style-type: none"> 1. The suggested infrastructure would be highly inconsistent with maintaining Rural Character and incompatible with Agricultural activities along this road. 2. The suggestion that 140th Place NE is an extension of SR---202 is fundamentally flawed. SR---202 transits the west side of the Sammamish Valley, parallel to the subject road. Any future capacity improvements should be focused on the existing SR---202. 3. The north end of the subject road feeds into a congested part of the City of Woodinville. Increased traffic capacity on this road would serve only to exacerbate that congestion. 	<p>These comments are consistent with the county recommendation on this Docket Request.</p>

MICHAEL TANKSLEY (HOLLYWOOD HILL ASSOCIATION) – COMMENTS ON DOCKET REQUESTS 12 TO 16	
COMMENT	RESPONSES
<p>4. The south end of this road intersects SR---202 at the Hollywood Hill roundabouts. This intersection is already near maximum capacity during busy periods. Traffic is often backed up to the roundabouts from another major intersection—SR 202 and NE 124th Street. Increasing traffic on this road would not improve traffic flow through the Valley, but would add to the existing congestion.</p> <p>5. The subject road has been the focus of numerous attempts to incorporate adjacent parcels into the Urban Growth Area. After much County, City and citizen time and energy discussing this over the decades, the result has been consistent: this area should stay Rural. Thus the infrastructure should remain of rural character as well.</p> <p>Docket item 13 This request should be denied.</p> <p>The subject property is an A---10 zoned farm inside the Sammamish Valley Agricultural Production District. The proponent’s supporting document misrepresents the physical characteristics of the subject parcel and its surroundings. It is clear the proposal does not satisfy the criteria for moving the UGA boundary established by the GMA, Countywide Planning Policies (CPP) and the King County Comprehensive Plan (CP). Earlier this year, this proposal was submitted to the Woodinville Planning Commission and City Council. The Hollywood Hill Association submitted an analysis to the City Council in opposition to the proposal in a letter dated May 4, 2015, a copy of which is attached. (For more background on the history of repeated attempts to convert Sammamish Valley farmland and Rural buffers to urban uses, see the HHA Comments on Motion 13475, attached).</p> <p>Key reasons this proposal must be denied include the following: The Washington State Growth Management Act (GMA) was adopted in response to widespread concerns over the effects of uncoordinated and unplanned growth, including loss of farmland and forests due to urban sprawl. The fundamental components of the law directed at stemming loss of these irreplaceable lands include: the mandate that agricultural and forest lands be permanently protected; the designation of Urban Growth Areas (UGAs) within which urban growth is encouraged; and designation of rural and natural resource areas where urban growth is prohibited. These are intended as long---term actions to provide permanent protection of natural resources, industries and the environment.</p> <p>Countywide Planning Policy FW---1 establishes a multi---step process for countywide planning, including Step 8. a., which provides criteria for amending the Urban Growth Area:</p>	<p>These comments are consistent with the county recommendation on this Docket Request.</p>

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<p>Amendments shall be based on an evaluation of the following factors:</p> <ul style="list-style-type: none"> • The criteria in policies LU---26 and LU---27; • The sufficiency of vacant, developable land and redevelopable land to meet projected needs; • The actual and projected rate of development and land consumption by category of land use including both development on vacant land and redevelopment projects; • The capacity of appropriate jurisdictions to provide infrastructure and service to the Urban Growth Areas; • The actual and projected progress of jurisdictions in meeting their adopted 20--year goals and targets of number of households and employees per acre; • The actual and projected rate of population and employment growth compared to adopted 20-year goals and target ranges, and compared to revised projections from the Washington State Office of Financial Management; • The actual and projected trend of economic development and affordable housing indicators, as reported annually through the adopted monitoring and benchmarks program; • Indicators of environmental conditions, such as air quality, water quality, and wildlife habitat, and others. <p>Even a cursory review of these legal criteria clearly demonstrates that this proposal must be denied.</p> <p>Docket item #14 This request should be denied. The subject property is zoned RA---2.5 within an equestrian overlay area. The densest zoning permitted in Rural Unincorporated King County is RA---2.5, thus the request for R---1 is unreasonable. Existence of non---conforming lots and/or uses is not a basis for permitted new subdivision or uses not permitted under current policies. New subdivisions in this area of King County are not permitted at this time due to local the traffic concurrency status of RED.</p> <p>Docket item #15 The HHA supports this proposed policy change.</p>	<p>These comments are consistent with the county recommendation on this Docket Request. The property owner has the potential to use the County's Transfer of Development Rights program to realize allowed densities under the existing zoning.</p>

MICHAEL TANKSLEY (HOLLYWOOD HILL ASSOCIATION) – COMMENTS ON DOCKET REQUESTS 12 TO 16	
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<p>A primary philosophy of the GMA and King County's planning policies is to focus growth within the Urban areas (UGA) while defending the open space and lower density development that characterizes the Rural areas. Allowing the use of TDRs to increase development density in the Rural areas is contradictory to this overarching philosophy. We are beginning to see the benefits of holding to this long---term planning principle, especially in our corner of King County where the burgeoning "wine tourism" industry is flourishing alongside the rebirth of active farming of some of the most fertile soils in the State. Removing the possibility of TDRs being used in a fashion contrary to this principle is in the best interests of our Rural communities.</p> <p>Docket item #16 This request should be denied.</p> <p>This is yet another case of a small group of landowners attempting to urbanize their Rural parcels. The subject properties' owners have made numerous attempts to incorporate themselves into the Urban Growth Area. After much County, City and citizen time and energy discussing this over the decades, the result has been consistent: this area should stay Rural. King County policy is clear that sewer service shall not be extended into Rural areas. As the subject properties are outside the UGA, the application of policy to deny this request should be clear in this case.</p>	<p>This request is not reflected in the 2016 Comprehensive Plan. King County believes the current approach, which reduces overall development potential in rural areas by extinguishing development rights through TDR. Edits to the text are included in the 2016 plan to clarify the rationale for this policy.</p> <p>These comments are consistent with the county recommendation on this Docket Request.</p>

MICHAEL TANKSLEY (HOLLYWOOD HILL ASSOCIATION) – FURTHER COMMENTS ON DOCKET REQUEST 13	
COMMENT	RESPONSES
<p><i>From: Michael Tanksley [mailto:wmtanksley@comcast.net]</i> <i>Sent: Wednesday, October 21, 2015 9:57 PM</i> NOTE: Forward of Comments Submitted to Woodinville City Council (May 4, 2015)</p> <p>RE: E---P and Companies of Nevada, Inc. request for City of Woodinville support to move the Urban Growth Boundary to locate the Zante Farm inside the Urban Growth Area</p> <p>Dear [Woodinville City] Councilmembers:</p>	<p>NOTE: This letter is a forward of comments made to the City of Woodinville; hence, no response is included herein.</p>

MICHAEL TANKSLEY (HOLLYWOOD HILL ASSOCIATION) – FURTHER COMMENTS ON DOCKET REQUEST 13	
COMMENT	RESPONSES
<p>As you continue the process of updating the City’s Comprehensive Plan, you will be making decisions that will impact the future of the City and, by close association, the greater Woodinville area. Unfortunately, history continues to repeat itself with yet another attempt to move the Urban Growth Boundary (UGB). E---P and Companies of Nevada, Inc. (E---P) proposes to move the UGB so that an urban development can be constructed on the Zante Farm, which is zoned Agriculture and located within the King County Agricultural Production District (APD). The E---P proposal should be rejected. It violates the State Growth Management Act (GMA), the Countywide Planning Policies, and the King County Comprehensive Plan. It is also simply put, bad planning. As the Council is well aware, the Sammamish Valley is an incredible amenity to the City and its pastoral beauty attracts thousands of visitors each year because of the ambiance that has helped foster the unique business and cultural phenomenon of the “wine tourism” industry. Paving over 15 acres of the beautiful Sammamish Valley and replacing them with apartments would negatively impact this business.</p> <p>There have been multiple similar requests to move the UGB over the past few decades. As recently as 2012, proposals to include farmland in the Urban Growth Area (UGA) were debated extensively. After considerable expenditure of both public and private resources, the result then, and in the case of all prior requests, has been consistent: there is no basis to move the UGB. This proposal is no different.</p> <p>The Hollywood Hill Association (HHA) has for decades supported protection of the Sammamish Valley and since the adoption of the 1990 Growth Management Act, the HHA has supported maintenance of the UGB in its current configuration. The HHA has also consistently defended the protections afforded the designated Agricultural Resource lands in the Valley. The HHA was one of the parties to the Supreme Court case <i>King County v. Hearings Board</i>, 142 Wn. 2d 543 in which the Court held that the proposal to locate active recreational facilities on agricultural land within the APD violated the Growth Management Act stating in part:</p> <p style="padding-left: 40px;">The soils of the Sammamish Valley APD have the unique characteristics of prime farmland. The APD includes some of the most productive agricultural land in the state, but it is also among the areas most impacted by rapid population growth and development. Even though the properties in this case lie in the APD, there is pressure to convert the land to nonagricultural uses. . . . When read together, RCW 36.70A.020 (8), .060(1), and .170 evidence a legislative mandate for the conservation of agricultural land. Further, RCW 36.70A.177 must be interpreted to harmonize with that mandate. Nothing in the Act permits recreational facilities to supplant agricultural uses</p>	

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<p>on designated lands with prime soils for agriculture.</p> <p>The County's amendments, which allow active recreational uses on designated agricultural lands, do not comply with the GMA, and the land in question does not qualify for innovative zoning techniques under RCW 36.70A.177. Although the GMA encourages recreational uses of land, there is no conservation mandate for recreational use as with agricultural use. In this case, the GMA mandates conservation of the APD's limited, irreplaceable agricultural resource lands. There are still thousands of acres suitable for athletic fields---outside the APDs.</p> <p>The current proposal is one more attempt to argue that the valuable resource lands of the Sammamish Valley should be replaced with a different use – in this case by apartments. The land E---P would have you designate for apartment development is part of the Sammamish Valley Agricultural Production District. This designation is based on the fact that the Valley soils are among the most productive in the State of Washington. Apartments can be built just about anywhere. Farming can only occur on farmland.</p> <p>Point---by---Point Rebuttal of the E---P Request</p> <p>The E---P request demonstrates a lack of understanding of legal and factual issues. It misrepresents what has, and continues to transpire along this critical boundary between urban development and important agricultural lands. We will address these points generally in the order and under the title in which they appear in the E---P request document.</p> <p>Introductory Discussion</p> <p>The Zante Farm is not within the King County's Urban Growth Area and the City does not have the legal authority to include the property within "<i>the City's UGA in the Comprehensive Plan Update</i>". The Zante Farm is also not within the City's potential annexation area and there is no legal basis "<i>to direct staff to designate a pre---annexation zoning of CBD for the property</i>".</p> <p>History of Prior Considerations of UGA Expansion</p> <p>E---P misrepresents the City Council's position with respect to Resolutions Nos. 414 (2012) and 447 (2014). Resolution 447 rescinded Resolution 414. Resolution 414 supported a prior proposal for moving the UGB in the Sammamish Valley to include Rural properties, including agricultural land. Contrary to the statement in the E---P letter, there is nothing in Resolution 447 that suggests any continued interest in moving the UGB in the Sammamish Valley on the part of the Woodinville City Council. Furthermore, the</p>	

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<p>proposed expansion in 2012 died not because of the need for infrastructure expansion on the part of the properties involved in the 2012 proposal, but because the body making the decision --- the King County Council – denied the proposal which clearly violated the Washington State GMA, the Countywide Planning Policies and the King County Comprehensive Plan.</p> <p>King County did not “<i>seize 5 acres</i>” of the Zante property. King County purchased 1.7 acres from the Zantes for \$80,000 in 1992 in order to build the south bypass road. The Zantes built a new 3,000 sf house on the property the same year.</p> <p>E---P states that “<i>the property has not been commercially farmed since 1985</i>”. Yet, the Zantes have been operating a farm stand every summer that sells flowers and produce grown on the property. (See attached pictures from the Zante Farm Facebook page and King County iMap.) Furthermore, regardless of how one defines “commercially farmed”, the critical point is that individual property owners do not determine whether land is or is not protected farmland. In 1998, the Washington State Supreme Court in <i>Redmond v. Growth Management Hearings Board</i>, 136 Wn.2d 38, also referred to as the Benaroya Decision, held that it is irrelevant whether or not an individual property designated as Agricultural Resource land is cultivated. It is the physical features of the land itself-----soil type in particular-----that determines whether land falls into the rare category of farmland. The Growth Management Act clearly recognizes this important, irreplaceable resource by mandating that local governments must designate and protect Agricultural Resource Land. The Court stated in part:</p> <p style="padding-left: 40px;">A stated legislative intent of the GMA is to maintain and enhance agricultural land. RCW 36.70A.020(8). One cannot credibly maintain that interpreting the definition of "agricultural land" in a way that allows land owners to control its designation gives effect to the Legislature's intent to maintain, enhance, and conserve such land. Indeed, the Board's interpretation is likely to have exactly the opposite effect. We decline to interpret the GMA definition in a way that vitiates the stated intent of the statute.</p> <p style="padding-left: 40px;">We hold land is "devoted to" agricultural use under RCW 36.70A.030 if it is in an area where the land is actually used or capable of being used for agricultural production. . . The land in this case was set apart for agricultural use by longstanding zoning. While the land use on the particular parcel and the owner's intended use for the land may be considered along with other factors in the determination of whether a parcel is in an area primarily devoted to commercial agricultural</p>	

MICHAEL TANKSLEY (HOLLYWOOD HILL ASSOCIATION) – FURTHER COMMENTS ON DOCKET REQUEST 13

COMMENT

production, neither current use nor land owner intent of a particular parcel is conclusive for purposes of this element of the statutory definition.

E---P states: “*the ground is no longer suitable for farming*”. This is simply false. The soils on the property are considered to be among the most productive in the State. The property is under cultivation at this time. (See photo on following page).



Zante Farm looking southwest, May 2015.

In this section, E---P also states: “*the farm is unable to compete with larger farms*”. The economic performance of any particular farming activity or farm operator is not the issue when it comes to the long-term resource protection mandated by the GMA and Countywide Planning Policies. Demand and pricing of urban farm products is dynamic and rapidly changing. The demand for locally produced agricultural products is seeing strong increases across King County and throughout the country. Not only do consumers desire the fresher, tastier produce that local farms can supply, food security concerns in the face of drought, salinization of irrigated desert soils and transportation costs add additional dimensions to

RESPONSES

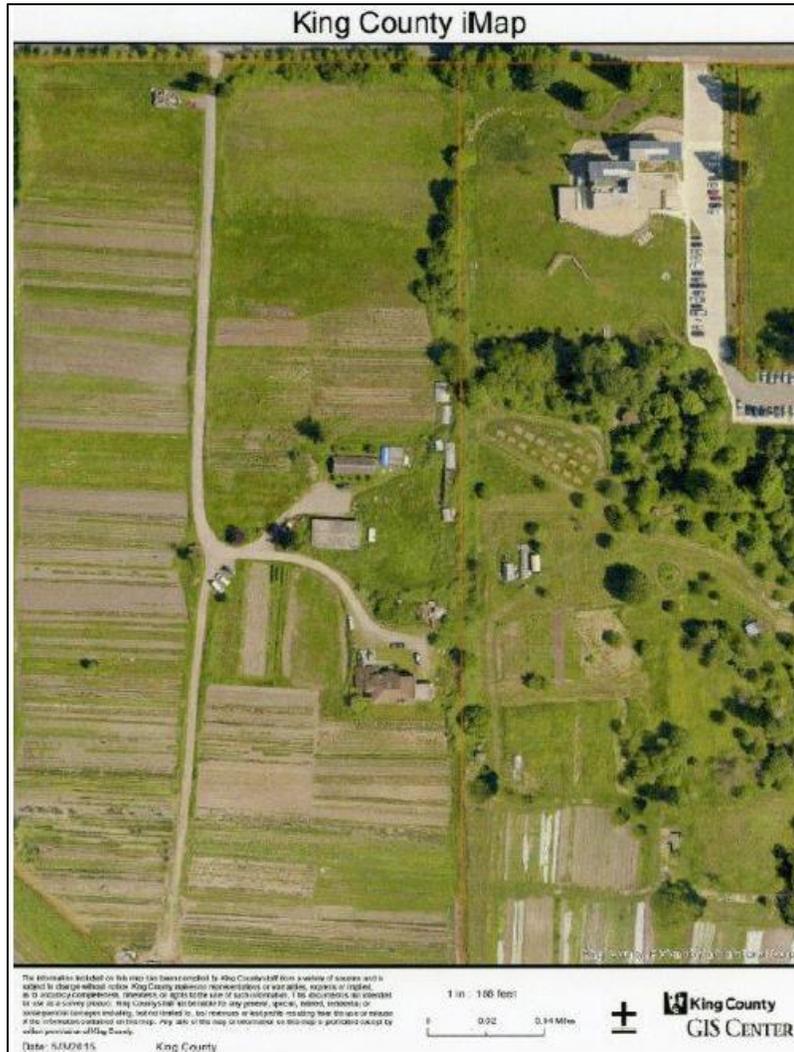
MICHAEL TANKSLEY (HOLLYWOOD HILL ASSOCIATION) – FURTHER COMMENTS ON DOCKET REQUEST 13	
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<p>the importance of long-term protection of our local farmland.</p> <p>ROW Dedication The apparent impact of plans to narrow NE 171st Street will be to calm traffic and improve the transition from the Urban side of the street to the Rural Agricultural (Zante) side of the street. This is likely to be more compatible with all uses in the area, including agricultural uses, than is the existing 5 lane speedway. (The plans for the road rebuild are continuing to be modified for a number of reasons and are by no means finalized. It is likely that the current drawings will be significantly modified, particularly in regards to the infrastructure on the south sides of the planned roundabouts.)</p> <p>Comprehensive Plan Support E---P claims that turning the Zante farm into an urban development will somehow help in “<i>protecting the agrarian rural character of the Valley</i>”. It boggles the mind to imagine how anyone could seriously believe that turning a highly visible farmland into an urban development could improve on Woodinville’s “agrarian character”. E---P also mentions additional access to the waterfront. However, there is currently ample access to the river through numerous public spaces and trails in the immediate vicinity.</p> <p>E---P states here that the Zante property is “<i>surrounded by urban uses</i>”. In reality, only one of the five Zante property lines borders on an ‘Urban’ use—a multi-unit residential development buffered by a row of trees. The property is bordered on two sides by Rural/Agricultural properties and uses, and the area abutting King County’s Sammamish River Park forms a third border. The north border is along NE 171st Street.</p> <p>E---P claims that Woodinville will need the property inside the Rural Area in order to meet GMA growth targets. This claim is speculative at best. Woodinville has a tremendous amount of land area in its CBD that can soak up its population growth needs for the foreseeable future. Per State law, in order for King County to consider moving the UGB as proposed by E---P, it must be demonstrated that the greater King County Urban Growth Area has run out of room to meet its growth needs – NOT just Woodinville.</p> <p>Agricultural Land Use Designation This section of the E---P letter attempts to offer a summation of E---P’s arguments in favor of the referenced request. Their inaccurate statements concerning soil and marketing conditions and adjacent urban uses have been addressed above. They make a new point concerning 21 Acres, falsely claiming it is an urban use. The property is zoned A---10 (Agriculture) and is under active agricultural uses.</p>	

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<p>Regardless of what one may think of the street---side building’s design, it is used to directly promote sustainable agriculture in our region.</p> <p>E---P wraps up page 3 with the statement: “<i>Future development of agricultural land in the Valley will not occur.</i>” This statement will come true only if we continue to stop misguided efforts such as this request from E---P to convert Rural and Agricultural parcels to Urban uses.</p> <p>E---P’s concern over the “<i>highest and best use of the property</i>” would be well applied toward protecting the continued use of the property as farmland, thus providing the increasingly valuable and irreplaceable benefits, from fresh food to pleasant ambiance, that the property offers by remaining in its longstanding status as Agricultural Resource land in Rural King County.</p> <p>Our Concluding Statement</p> <p>The single overriding factor that most threatens the survival of agriculture in the Sammamish Valley is land price inflation due to speculative pressures. For farming to survive, farmers must be able to realize a viable economic model through the business of farming. Farming is a tough business, but the single biggest challenge for farmers in our region is the price of land and proposals like the one before the Council. Farmers need stability and the assurance that they will be able to invest in farmland and be able to continue to farm without constant threats such as this one. If we allow proposals such as E---P’s to go forward, the prices of farmland all across the Valley will go ever higher, effectively barring new farmers from coming onto the land.</p> <p>The GMA mandate for long---term preservation of Agricultural Lands was enacted for good reason. It was enacted to prevent short---sighted decisions—to stop the “death by a thousand cuts” history of farmland May 4, 2015 Woodinville City Council Page 6 loss we have experienced in the Puget Sound Region. This is a proposal by a Nevada company, based in California, purporting to tell us what is good for Woodinville and Washington. Let’s think for ourselves. Let’s follow our law. Let’s reject this proposal.</p> <p>Hollywood Hill Association, Mike Tanksley, President</p> <p>Attachments:</p>	

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Aerial view of the Zante farm, which occupies the left half of this photo.



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COMMENT

Fred Zante Farm's current Facebook page



RESPONSES

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COMMENT

A posting on the Fred Zante Farm Facebook page from last year.



RESPONSES

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<p><i>From: Michael Tanksley [mailto:wmtanksley@comcast.net]</i> <i>Sent: Wednesday, October 21, 2015 9:57 PM</i></p> <p style="text-align: center;">Comments on Motion 13475 Sammamish Valley Area Comprehensive Plane Designation and Zoning Study December 12, 2011</p> <p>The following comments are submitted by the Hollywood Hill Association in support of the recommendation of the Executive to retain the current Comprehensive Plan (“CP”) land use designations and zoning on those parcels located in the Sammamish Valley referenced in Motion 13475.</p> <p>Motion 13475 directed the Executive to conduct a study of ten parcels and two tracts located within the Sammamish Valley that are zoned Agricultural or Rural to determine whether they should be included in the Urban Growth Area for the purpose of annexation by the City of Woodinville. Testimony offered at the time of the County Council’s consideration of Motion 13475 was that the City of Woodinville wants to add these properties to the City to allow urban development that will generate sales tax revenue and promote economic development.</p> <p>The City offered no analysis of how its proposal is consistent with the Growth Management Act, the Countywide Planning Policies or the King County Comprehensive Plan. As noted in the Executive’s recommendation, this proposal falls far short of the requirements that must be met to change the County’s Urban Growth Boundary. Retention of the existing CP designations and zoning of these Agricultural and Rural buffer properties is crucial to the preservation and protection of the valuable and irreplaceable Sammamish Valley farmlands.</p> <p style="text-align: center;">Description of Parcels Included In Study Area</p> <p>The study area includes ten parcels and two tracts (Map 1). The “Northern Parcels” (Map 3) consist of</p>	<p>NOTE: This letter is a resubmission of comments made previously regarding development in the Sammamish Valley; hence, no response is included herein.</p>

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<p>seven parcels located south of NE 171st Street and west of 140th Place NE. The largest parcel (Parcel 1026059031) is approximately 8 acres in size. The majority of this parcel is designated Agricultural in the CP and zoned Agricultural. The Agricultural zoned portion is located in the Sammamish Valley Agricultural Production District. The remainder of this parcel is designated Rural in the CP and is zoned Rural 2.5. About half of the parcel lies within a large wetland identified by the National Wetland Survey (Map 5). The remaining six Northern Parcels are designated Rural and zoned Rural-2.5. The northern five of these parcels are shown as wholly or partly within the large wetland area designated by the National Wetland Inventory Survey.</p> <p>The “Southern Parcels” (Map 4) consist of the remaining three properties located just north of NE 145th Street on the west side of 148th Ave NE. The Southern Parcels are zoned Agricultural-10. Two of the three parcels are designated as having wetlands by the King County Wetlands Survey. Derby Creek, proposed for restoration by King County, runs through one of the Southern Parcels.</p> <p>All of the properties in the study area are located in a category 2 Critical Aquifer Recharge Area (CARA) (Map 6). With the exception of two parcels, all of the Northern and Southern Parcels directly abut Agricultural zoned land located in the Sammamish Valley Agricultural Production District.</p> <p style="text-align: center;">Historical Background</p> <p>There has been constant pressure over the years to allow urban development in the Sammamish Valley. This was one of the factors that led to passage of the 1979 Farmland Preservation Program (“FPP”). The Sammamish Valley was then zoned General – a catch all zone that allowed most of the types of uses now seen in the Kent Valley. Implementation of the FPP in the Sammamish Valley took many years, including multiple King County purchases of development rights from owners of land on the Sammamish Valley floor (Map 2). However, several property owners chose not to sell their development rights and development pressures have continued. Because of the continued pressure and threats to the farmland, most of the west side of the Valley located in unincorporated King County south of SR 202 and the east side of the Sammamish Valley was rezoned from General to Agricultural.</p> <p>The pressure to urbanize the Valley continued with the third and successful incorporation effort of the City</p>	

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<p>of Woodinville. The City of Woodinville and a small number of property owners and other interested parties have continued to propose expansion of Woodinville’s boundaries to include more of the Sammamish Valley in an effort to develop Valley land for urban uses. Pressure to expand the urban area continues to the present day as evidenced by Motion 13475.</p> <p>What follows is a brief summary of the conflict between attempts to urbanize the Sammamish Valley and farmland preservation efforts over the last 30+ years.</p> <ul style="list-style-type: none"> • 1979 – The Farmland Preservation Program is approved by King County voters. • 1987 – A proposal to change the zoning code that would allow a large commercial development on the northeast corner of SR 202 and NE 124th (the Molbak greenhouse property) is withdrawn when the King County Hearing Examiner issues a decision requiring an Environmental Impact Statement for the proposed zoning change. • 1990 – Washington adopts the Growth Management Act (“GMA”) to preserve resource lands and prevent sprawl. • 1991-1992 - The City of Woodinville’s third attempt to incorporate includes the industrial portion of the Sammamish Valley and a large part of the agricultural and rural eastern portion of the Sammamish Valley (including the properties now at issue). King County, the Hollywood Hill Association, and many citizens opposed inclusion of the eastern Valley parcels. The Boundary Review Board (“BRB”) removed the maximum land area allowed by statute (10%) from the proposed incorporation boundaries, including most of the area located within the eastern portion of the Sammamish Valley. All of the properties included within Motion 13475 were part of the original properties included within the proposed City boundaries and removed by the BRB. • 1992 – Attempts to re-designate property in the Sammamish Valley and adjacent properties to commercial and multi-family in the Northshore Community Plan (the Plan covering the Sammamish Valley prior to adoption of the County’s GMA Comprehensive Plan), including the “Schiesl Property”, now known as the South 47 Farm, were denied. The County subsequently acquired the development rights to the South 47 Farm which is very actively farmed today. 	

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<ul style="list-style-type: none"> • 1993 – An amendment to Ordinance 91-346 is proposed to study inclusion of the Northern Properties now included within the present Motion 13475 within the Urban Growth Area (“UGA”). These properties were not included in the UGA. • 1994 – The BRB denied the proposed annexation of 4 properties located on the Rural side of King County’s interim UGA. This was the first test of the application of the prohibition against annexation of properties located on the Rural side of the UGA line to an interim UGA boundary. The decision effectively killed annexation requests of 6 other King County properties located on the Rural side of the line. The proposed annexations included properties in the Rural Area near some of the Motion 13475 properties. Subsequently King County adopted the permanent Urban Growth Boundary excluding those properties from the UGA. • 1997 – 2000 - Proposed amendments to the County’s Comprehensive Plan that would have allowed conversion of farmland located in the northeastern Sammamish Valley (in the APD) to a large sports field complex that would be used by thousands of people were ultimately defeated by a decision of the State Supreme Court in <u>King County v. Central Puget Sound Growth Management Hearings Board</u> 142 Wn.2d 543 (2000). The Court in holding that the proposed uses would violate the GMA stated: • <i>In summary, the agricultural lands provisions (RCW 36.70A.020(8), .060, and .170) direct counties and cities (1) to designate agricultural lands of long-term commercial significance; (2) to assure the conservation of agricultural land; (3) to assure that the use of adjacent lands does not interfere with their continued use for agricultural purposes; (4) to conserve agricultural land in order to maintain and enhance the agricultural industry; and (5) to discourage incompatible uses.</i> . . . <i>"Natural resource lands are protected not for the sake of their ecological role but to ensure the viability of the resource-based industries that depend on them. Allowing conversion of resource lands to other uses or allowing incompatible uses nearby impairs the viability of the resource industry." City of Redmond, 136 Wn.2d at 47 (quoting Richard L. Settle & Charles G. Gavigan, <i>The Growth Management Revolution in Washington: Past, Present, and Future</i>, 16 U. PUGET SOUND L. REV. 867, 907 (1993)).</i> 	

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<p>.....</p> <p>CONCLUSION</p> <p><u>The soils of the Sammamish Valley APD have the unique characteristics of prime farmland. The APD includes some of the most productive agricultural land in the state, but it is also among the areas most impacted by rapid population growth and development. Even though the properties in this case lie in the APD, there is pressure to convert the land to nonagricultural uses.</u></p> <p>.....</p> <p><u>When read together, RCW 36.70A.020(8), .060(1), and .170 evidence a legislative mandate for the conservation of agricultural land.</u></p> <p>(Emphasis added).</p> <ul style="list-style-type: none"> • 2004 – A proposed amendment to allow large “Horticulture Centers” (commercial/retail feed, garden and florist sales building with no size limit, plus a 3,500 SF restaurant and 8,000 SF conference center) in the Rural Area and to exempt them from compliance with Rural area traffic concurrency standards was defeated. This proposal, if adopted, would have allowed a large commercial use attracting thousands of people to be located within the Rural Area on the Molbak greenhouse property (NE corner of SR 202 and NE 124th St.) which is directly adjacent to the APD. • 2003-2005 – As part of the 2004 update to the Comprehensive Plan several property owners in the northeastern Sammamish Valley (including some owners of properties subject to Motion 13475) filed a comprehensive plan docket request to change property designations from Rural and Agricultural to Urban. These docket requests were consolidated and heard by a hearing examiner who did not support the proposed amendments. At approximately the same time, a challenge was filed with the Growth Management Hearings Board alleging Rural zoned properties should not be included in the Sammamish Valley APD. The Board’s 2005 decision agreed that properties located in the APD were required to have Agricultural zoning. A review of the 129 Rural zoned properties included in the Sammamish Valley APD was conducted to determine whether any Rural zoned properties needed to be removed or whether they should remain in the APD and be zoned to Agricultural. The County conducted 	

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<p>a thorough review of the affected properties, including all of the Northern Parcels. The County Council approved the removal of 35 acres from the APD that were developed with permanent non-agricultural structures and those parcels retained their Rural zoning. The other 94 acres were re-designated from Rural to Agricultural in the Comprehensive Plan, zoned to A-10 and remained in the APD.</p> <ul style="list-style-type: none"> • In 2005 policies were adopted as amendments to the 2004 Comprehensive Plan to address the process of removal of the 35 acres from the APD. Policy-R 548 and 548A (subsequently re-numbered as Policy R-654 and 655) provided in part that <u>“the land to be removed from the APD shall retain rural zoning and shall not be rezoned to urban zoning”</u>. See Policies R-654 and R-655 cited and discussed below and in the Executive’s recommendation. The owners of these parcels now want to violate this policy by again asking for urban zoning. • 2010-2011– Woodinville proposes amending the Urban Growth Boundary and Motion 13475 is passed. <p style="text-align: center;">Threats to Agriculture</p> <p>These continued attempts to urbanize portions of the Valley are detrimental to the farming community on multiple levels. Urban uses are incompatible with farming. Stormwater run-off from impervious surfaces creates saturated soil conditions. Night lighting is detrimental to crops. Allowing urban uses causes land values to escalate because of speculation that further urban uses will be allowed. This causes property values to increase to a level that farmers cannot afford. The prospect of conversion of close-in Agricultural and Rural buffer land to urban uses dissuades owners from devoting their land to agricultural or low intensity uses. With hopes of high land sale prices on the horizon, owners will not sell or lease at market prices for agricultural or low intensity rural uses. Farmers and those engaged in rural uses in these bordering areas are not able to get long-term control of property through purchases or long-term leases. They are reluctant to make capital investments such as installation of drainage and irrigation systems, or to invest in purchases of equipment without long-term control of the land.</p> <p>Farming is thriving in the Sammamish Valley, but the continued vitality of agriculture requires consistency and predictability that incompatible uses will not be allowed and that land values will remain at an</p>		

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<p>affordable level. We believe it is time for the Council to end the continued efforts to urbanize the Valley once and for all by denying this proposal to move the Urban Growth Boundary and by establishing, as a prerequisite for Council consideration of any future proposal to move the UGA boundary, that the proponent demonstrate all requirements of the GMA, CPPs and CP for considering such action have been met.</p> <p style="text-align: center;">Criteria for Moving Urban Growth Boundary</p> <p>The City of Woodinville has proposed moving the urban growth boundary in the Sammamish Valley to permit annexation of Rural and Agricultural lands. Its motivation is to generate more sales tax revenue and encourage economic development, including expansion of the Woodinville Tourist District. This proposal completely fails to address, and certainly does not satisfy, the criteria for moving the UGA boundary established by the GMA, Countywide Planning Policies (CPP) and the King County Comprehensive Plan (CP).</p> <p style="text-align: center;">Growth Management Act</p> <p>The Washington State Growth Management Act (GMA) was adopted in response to widespread concerns over the effects of uncoordinated and unplanned growth, including loss of farmland and forests due to urban sprawl. The fundamental components of the law directed at stemming loss of these irreplaceable lands include: the mandate that agricultural and forest lands be permanently protected; the designation of Urban Growth Areas (UGAs) within which urban growth is encouraged; and designation of rural and natural resource areas where urban growth is prohibited. These are intended as long-term actions to provide permanent protection of natural resources, industries and the environment. Planning and land use regulation on a state-wide and regional basis in order to protect broad public interests has replaced prior eras of uncoordinated land use decisions based solely on parochial political and economic interests. The GMA and regional planning efforts have put in place procedures, rules and criteria for considering changes to UGAs. These requirements are particularly important in the case of proposed changes to UGAs that would convert Agricultural and buffering Rural lands to urban. As held by the Washington State Supreme Court in <u>King County v. Central Puget Sound Growth Management Hearings Board</u> (more fully discussed in the Historical Background section):</p> <p style="text-align: center;"><i>. . . the agricultural lands provisions (RCW 36.70A.020(8), .060, and .170) direct counties and</i></p>	

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<p><i>cities (1) to designate agricultural lands of long-term commercial significance; (2) to assure the conservation of agricultural land; (3) to assure that the use of adjacent lands does not interfere with their continued use for agricultural purposes; (4) to conserve agricultural land in order to maintain and enhance the agricultural industry; and (5) to discourage incompatible uses. . . .</i></p> <p><u>When read together, RCW 36.70A.020(8), .060(1), and .170 evidence a legislative mandate for the conservation of agricultural land.</u></p> <p style="text-align: center;">Countywide Planning Policies</p> <p>Countywide Planning Policy FW-1 establishes a multi-step process for countywide planning, including Step 8. a., which provides criteria for amending the Urban Growth Area:</p> <p>Amendments shall be based on an evaluation of the following factors:</p> <ul style="list-style-type: none"> • The criteria in policies LU-26 and LU-27; • The sufficiency of vacant, developable land and redevelopable land to meet projected needs; • The actual and projected rate of development and land consumption by category of land use including both development on vacant land and redevelopment projects; • The capacity of appropriate jurisdictions to provide infrastructure and service to the Urban Growth Areas; • The actual and projected progress of jurisdictions in meeting their adopted 20-year goals and targets of number of households and employees per acre; • The actual and projected rate of population and employment growth compared to adopted 20-year goals and target ranges, and compared to revised projections from the Washington State Office of Financial Management; • The actual and projected trend of economic development and affordable housing indicators, as 	

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<p>reported annually through the adopted monitoring and benchmarks program;</p> <ul style="list-style-type: none"> Indicators of environmental conditions, such as air quality, water quality, and wildlife habitat, and others. <p>Woodinville has provided no analysis of these factors. The development scenarios cited in support of the proposal focus upon medical office uses for the northern parcels and wine tasting and/or wineries for the southern properties. Even without inquiry certain obvious factors show consideration of expanding the UGA based on lack of alternative sites for these uses is not warranted:</p> <ul style="list-style-type: none"> The 24-acre “Woodinville Wine Village” located just south of the southern parcels inside Woodinville’s Tourist District has been approved for mixed-use winery related development for several years, but no development has occurred; Just north of the Northern Parcels across NE 171st Street, there are large areas of underutilized property zoned Central Business District and Office. The current City of Woodinville Comprehensive Plan, Appendix 3, page 11 states: “After deducting constraints, Woodinville has nearly 174 net acres of vacant and redevelopable commercial and industrial land. After adjusting for market factors, about 141 acres are potentially available for development during the planning period.” <p style="text-align: center;">King County Comprehensive Plan</p> <p>The King County Comprehensive Plan provides that the boundary between UGAs and Rural Areas is intended as a long-term boundary that can only be reviewed under tightly controlled conditions:</p> <p>RP-107 The line is considered long-term and can only be amended consistent with Countywide Planning Policy FW-1, and comprehensive plan policies contained in this plan.</p> <p>R-203 King County’s Rural Area is considered to be permanent and shall not be redesignated to an Urban Growth Area until reviewed pursuant to the Growth Management Act (RCW 36.70A.1130</p>	

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<p>(3)) and Countywide Planning Policy FW-1</p> <p>The County is required by the GMA to preserve and protect resource lands. Policy R-650 recognizes this commitment.</p> <p>R-650 King County commits to preserve APD parcels in or near the Urban Growth Area because of their high production capabilities, their proximity to markets, and their value as open space. King County should work with cities adjacent to or near APDs to minimize the operational and environmental impacts of urban development on farming, and to promote activities and infrastructure, such as farmers' markets and agriculture processing businesses, that benefit both the cities and the farms by improving access to locally grown agricultural products.</p> <p>The proposal to move the Urban Growth boundary would require the removal of the majority of Parcel 1026059170 from the Sammamish Valley APD for the purpose of annexing it to Woodinville. There is absolutely no basis for removing this Agricultural zoned land from the APD, placing it in the UGA and allowing annexation to Woodinville. Doing so would violate the following policies:</p> <p>R-613 Designated Forest and Agricultural Production District lands shall not be annexed by cities.</p> <p>R-654 Lands can be removed from the APDs, except as provided in R-655, only when it can be demonstrated that:</p> <ol style="list-style-type: none"> a. Removal of the land will not diminish the productivity of prime agricultural soils or the effectiveness of farming within the local APD boundaries; and b. The land is determined to be no longer suitable for agricultural purposes. <p>In addition to meeting these two tests, removal of the land from the APD may only occur if it is mitigated through the addition of agricultural land abutting the same APD of equal acreage and of equal or greater soils and agriculture value.</p> <p>Policy R-655 cited below was adopted to authorize removal of parcels from the APD in order to implement the Growth Management Hearings Board decision requiring all properties in the APD to be zoned Agricultural (discussed in the Historical Background – Years 2003-2005). Policy R-655 mandates</p>	

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<p>that the properties removed remain Rural. This particular policy applies to all of the Northern Parcels that were removed from the APD in 2005.</p> <p>R-655 Land that is zoned rural and has permanent non-agricultural structures can be removed from the Sammamish APD only when a subarea plan demonstrates that removal of the land will not diminish the productivity of prime agricultural soils or the effectiveness of farming within the APD. <u>Land to be removed from the APD shall retain rural zoning and shall not be rezoned to urban zoning.</u> The removal of land zoned rural from the Sammamish APD shall not be contingent on the addition of land to the APD.</p> <p>The proposed amendment is manifestly inconsistent with these policies. No attempt has been made by the City to establish the requisite requirements to move the Urban Growth Boundary.</p> <p style="text-align: center;">Conclusion</p> <p>The GMA, CPPs and King County Comprehensive Plan mandate a very rigorous and methodical process to determine whether a change in the Urban Growth Boundary is required. Woodinville’s proposal is unsupported by the facts or the law. The County has reviewed and rejected similar proposals over the last several years and the facts have not changed. The need to expand the Urban Growth Area has not been established and cannot be justified because the requisite criteria have not and cannot be met. This proposal must be rejected.</p> <p>The Agricultural land in the Sammamish Valley is a natural resource of Statewide Significance. The adjacent Rural land buffers the Agricultural land from encroaching urban development. The GMA mandates that this Agricultural and Rural buffer land be permanently protected.</p> <p>The King County Council needs to establish a high threshold for considering proposals to expand a UGA, particularly when Agricultural and/or Rural buffer lands would be affected. Repeated consideration of UGA expansion fosters land speculation that is detrimental to Agricultural and Rural uses. Future proposals to expand the UGA should not be considered by the Council without a clear showing by the proponent that the criteria in the GMA, CPPs and the King County CP have been analyzed and satisfied.</p>	

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<p>Respectfully submitted,</p> <p><i>(Attachments in 2011 Transmittal – not included herein)</i></p> <ul style="list-style-type: none"> Map 1 - Study Area Overview Map (Northern and Southern Parcels) Map 2 - Farmland Preservation Properties Overview Map Map 3 - Northern Parcels Map 4 - Southern Parcels Map 5 – Wetland Map Map 6 - Critical Aquifer Recharge Areas Map 	

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UPPER BEAR CREEK COMMUNITY UNINCORPORATED AREA COUNCIL – SUPPORT FOR GREATER MAPLE VALLEY UAC COMMENTS	
COMMENT	RESPONSES
<p><i>From: Nancy Stafford [mailto:nancy@go2email.com]</i></p> <p><i>Sent: Friday, September 11, 2015 9:16 AM</i></p> <p>Please note: the Upper Bear Creek Community Unincorporated Area Council endorses this¹ action</p> <p>¹[The GMVUAC COMMENTS related to the 2016 KCCP Update's Docket Items. – Shown below].</p>	<p>Staff from the Water and Land Resources Division and the Office of Strategy Performance and Budget worked collaboratively with the members of the Green Valley/Lake Holms Association to develop the</p>

UPPER BEAR CREEK COMMUNITY UNINCORPORATED AREA COUNCIL – SUPPORT FOR GREATER MAPLE VALLEY UAC	
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Nancy Stafford	policy language in Policy E-497 and F-274.

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DAN WILLIAMS – NORTH BEND AREA LAND USE AND ZONING PROPOSAL	
COMMENT	RESPONSES
<p><i>From: Dan Williams [mailto:rustedvan@gmail.com]</i> <i>Sent: Friday, July 31, 2015 2:45 PM</i></p> <p>I would like to quickly comment on the rezoning of the following parcels.</p> <p>2223089049, 2223089019, 2223089002, 2223089026, 2223089055, 1523089018, 1523089147 , 1523089039, 152308932, 1523089194, 1523089170, 1523089019, 1523089124, and 1523089133</p> <p>As a small business owner in the upper Snoqualmie Valley, it is nice to see some growth, however rezoning these parcels from rural to urban is a step in the wrong direction. I am going to highlight three reasons to say no to the urbanization of parcels listed above.</p> <ol style="list-style-type: none"> 1. Strain on our aquifer. With climate change upon us, year's such this year will become more common. So drought, once rather uncommon, may become more common. This will increase the strain on our aquifer in the valley. Unchecked growth may result in additional strain and depletion of our aquifer. 	<p>Comments noted. These are consistent with the recommendation in the Area Zoning Study.</p> <p>The Area Zoning Study identifies that the properties are eligible, if combined with those to the immediate north (i.e., the Golf Course) for a Four to One application.</p>

DAN WILLIAMS – NORTH BEND AREA LAND USE AND ZONING PROPOSAL	
COMMENT	RESPONSES
<p>2. Promoting the building of single family homes 15 miles or more from most job centers is irresponsible. It only encourages the burning of fossil fuels, especially since there is very limited bus service in East King County. This will only exasperate the effects of climate change. We should be leading the charge for responsible locally sourced living, and not continuing down the path of irreparable destruction of our planet.</p> <p>3. The world is changing and it is time to change our way of thinking. Mid-twentieth century growth models are no longer valid, so they shouldn't be used. Instead a progressive plan that accounts for changing demographics, climate change and responsible develop should be employed. Increasingly, younger generations want to live in cities. If they do move to the suburbs they want to still be close to the city center and within walking distance of a bus line. They simply do not share the driving habits of their elders. As we move beyond fossil fuels, local sourcing will become more important. So the rural nature of East King County will be even more desirable. Finally, because of changing demographics and fossil fuel depletion any rezoning would only be for the short-term benefit of builders and landholders. Long term, as our earth changes and our urban areas shrink, the vast tracks of empty single family homes will serve only as a reminder to the ineffective and pandering governments of the late twentieth and early twenty-first centuries.</p> <p>Thank you,</p> <p>Dan Williams</p>	<p>The Area Zoning Study also identifies, preliminarily, some of the County's interests were a Four to One application to be submitted.</p> <p>As these comments go beyond just this one area zoning study, King County notes that there are policies throughout the 2016 Plan that address climate change.</p>

DAVID C. WINANS – RAINIER CHRISTIAN SCHOOL SITE	
COMMENT	RESPONSES
<p><i>From: David C. Winans [mailto:DWinans@GGLO.com]</i> <i>Sent: Monday, May 18, 2015 9:12 AM</i></p> <p>My wife and I live in Woodside and would like to be notified of any proposed changes to the Rainier</p>	<p>As of March 1, 2016, there has been</p>

DAVID C. WINANS — RAINIER CHRISTIAN SCHOOL SITE	
COMMENT	RESPONSES
<p>Christian School site next to the Woodside neighborhood.</p> <p>One of the topics covered in the 5/5/15 town meeting, with Reagan Dunn and other King County officials, was the 2016 update to the King County Comprehensive Plan. This plan controls how development in unincorporated King County will be controlled. In the past updates Rainier Christian Schools have proposed converting the property next to the Woodside Community and build a high school, including a stadium, on the property. Among the proposed access to the high school were entrances off Parkside at 170th Place and another off Parkside at 168th Terrace SE. Possible impacts would include increased traffic on our narrow streets. Also the site is an Nike missile site that was abandoned in the 1950s. What was left behind is unknown. It may be contaminated toxic site that will need to be thoroughly inspected and possibly require a major cleanup.</p> <p>Currently the high school proposal is not in the plan, but the county personnel have heard rumors that a proposal will be submitted. In the past a proposal has been presented at least twice and defeated by community response.</p>	<p>no proposal submitted in the 2016 Plan process for this property.</p>

X

Y

Z

III. COMMENTS AFTER RELEASE OF PUBLIC REVIEW DRAFT

A

EMMA AMIAD – VASHON ISLAND HOUSING	
COMMENT	RESPONSES
<p><i>From: Emma Amiad [mailto:eamiad@vashonislandrealestate.com]</i> <i>Sent: Wednesday, January 06, 2016 11:31 AM</i></p> <p>I am very impressed with the comp plan updates as presented by the County stand. I am particularly pleased with the alternative housing ideas. On Vashon we have high rents, very few rentals, and a desperate need for a large number of low income workers and low income retired folks to find housing. I want to see accessory dwelling units on every property possible to give our seniors and low income folks an option for staying on the island. Accessory units can answer that need. I am also in support of the environmental section of the plan and the idea that property owners with slide or erosion hazards are made aware of the problems.</p>	<p>Accessory dwelling units (ADUs) can be done and can be expanded on Vashon if there is a strong interest in doing so by residents. King County is looking forward to working with Vashon on its sub-area plan, and incorporating a special Vashon ADU pilot project, if there is indeed such an interest.</p>

ANONYMOUS – SKYWAY WEST HILL ACTION PLAN	
COMMENT	RESPONSES
<p><i>West Hill / North Highline / Urban Annexation Areas Community Meeting Comment Card</i></p> <p>Important issues for skyway:</p> <ol style="list-style-type: none"> 1. Zoning changes as per Skyway-West Hill Action Plan to improve our commercial area 2. No more pot shops in our community! We need more diverse businesses. 	<ol style="list-style-type: none"> 1. The Council will consider the SWAP during its review of the 2016 Comprehensive Plan update. Any zoning changes will flow from that review. 2. The State controls the issuance of marijuana retail licenses, not the County. The County appreciates the

ANONYMOUS — SKYWAY WEST HILL ACTION PLAN	
COMMENT	RESPONSES
	<p>need for and community concern around a diverse business community, but, as a regional government, does not have economic development functions. The City of Seattle is a provider of local government services and has an office of economic development to help its neighborhoods.</p>

B

DAVID BADER — DUTHIE HILL NOTCH AREA ZONING STUDY	
COMMENT	RESPONSES
<p><i>Snoqualmie Valley – Bear Creek – Sammamish Community Meeting Comment Card</i></p> <p>I just purchased a home in the Duthie Hill Notch and moved in two weeks ago. We purchased this with the love of having a dead-end street. Because we have a two-year old son and five year old, having a major street is not something a parent wants in their front yard. If a road is put in, sidewalks and street lights are required and the Plan/Rules don't have that incorporated. If this road is built, my property value is going to drop. Who is going to compensate the homeowners for this? If I knew this was going to happen I would not have purchased this property.</p>	<p>Comments noted.</p> <p>The Area Zoning Study does not at this time recommend that the area be recategorized to urban.</p> <p><i>See responses at Darin Goehner (Moss Adams) below.</i></p>

CAROLYN BOATSMAN – MULTIPLE TOPICS	
COMMENT	RESPONSES
<p><i>From: Carolyn Boatsman [mailto:c.boatsman@comcast.net]</i> <i>Sent: Wednesday, January 06, 2016 4:59 PM</i></p> <p>Put growth in high opportunity locations with good transit service. This will make it more affordable to live, work, and commute. This is particularly important for those of modest means, who always seem to take the brunt of the changes in the booming metropolis.</p> <p>Invest in transportation choice: we have plenty of cars and roads and pollution and global warming. We need more transit, bike lanes, and sidewalks.</p> <p>Continue to preserve natural resources and rural area. No to moving back the boundaries of the urban area. Keep it rural. The humans will just have to figure out how to squish into the land area they have now allotted to urban. Maybe they will be smart enough to have less babies. Maybe with more crowded cities, people won't move to this place. That's good, we have enough people.</p> <p>Monitor our progress and make changes quickly if we've got it wrong as we go forward.</p>	<p>The policies focus on placing growth in areas with good transit service. This means focusing growth within cities and centers and supporting transit oriented development.</p> <p>Multiple chapters have been updated with policies related to Climate Change and reference the work of the Strategic Climate Action Plan and King County Cities Climate Collaboration (the K4-C).</p> <p>Chapter 12 includes a new Workplan section that includes an Action to develop a Performance Measures Program that is specifically related to the goals, and timeframes, of the Comprehensive Plan.</p>

ROBERT BRAEUTIGAM — DUTHIE HILL NOTCH AREA ZONING STUDY	
COMMENT	RESPONSES
<i>Snoqualmie Valley – Bear Creek – Sammamish Community Meeting – Comment Letter, Dec 2, 2015</i>	

ROBERT BRAEUTIGAM – DUTHIE HILL NOTCH AREA ZONING STUDY		
COMMENT	RESPONSES	
<p>Comprehensive Plan Public Meeting <i>12/02/2015</i></p> <p>My name is Robert Braeutigam and I reside at 2640 271st Ave SE, Issaquah, which is within the Duthie Hill Notch.</p> <p>I would like to address Area Zoning Study 7 – Duthie Hill Notch, which addresses revision to the Urban Growth Boundary to move the notch within the Urban Growth Area..</p> <p>I fully support the conclusion that “ based on existing policies, and the proposal as it is structured in Motion 14351, the UGA boundary should not be expanded at this time.” However, I equally do not support the recommendation to “consider a Four to One proposal developed through the GMPC process or through direct application to the program.”</p> <p>As noted in the study, per DP16, a Four to One exchange is to be allowed only when such area is “contiguous with the Urban Growth Area with at least a portion of the dedicated open space surrounding the proposed Urban Growth Area expansion.” Those conditions do not exist for the Duthie Hill Notch. Any exchange imaginable would involve land within the City of Sammamish removed from the Notch and would require an amendment to County Policy. I further submit that any attempt to negotiate such a transfer places those residents of the Notch who oppose such action at a disadvantage. We are not members of the GPMC, whereas the City of Sammamish is. Allowing us to speak for two minutes at a GPMC meeting is far overshadowed by the time and opportunity the City would have to discuss and negotiate such an agreement. This is far removed from the transparency and accessibility the County local governments purport to support.</p> <p>But these are just process issues, and not the heart of the matter. I would be disingenuous to not admit that time and financial considerations have altered our neighbors’ position such that now 10 of 17 property owners favor or no longer oppose incorporation into the UGA and ultimate annexation to Sammamish. But numbers do not tell the whole story. The largest drivers behind the effort to</p>	<p>Comments noted. These are consistent with the recommendation in the Area Zoning Study.</p> <p>Note that the Area Zoning Study has been updated to reflect the work done by the Interjurisdictional Team. As directed by the Growth Management Planning Council (a multi-jurisdictional body that is further described in the Area Zoning Study), the Interjurisdictional Team worked with staff from the City of Sammamish to identify possible approaches to the Duthie Hill Notch situation – these include Transferable Development Rights Program and the Four to One Program.</p> <p>As noted in the updated Area Zoning Study, the City considered the options developed by the Interjurisdictional Team and choose not to move forward with any of these. At the time of release of the 2016 Executive Recommended Plan, no further discussions are scheduled between the City and the Interjurisdictional Team.</p>	

ROBERT BRAEUTIGAM – DUTHIE HILL NOTCH AREA ZONING STUDY		
COMMENT		RESPONSES
<p>change the UGA are owners of three 5 acre lots, one of which is actually titled to a development LLC. Their intents are not to add homes consistent with the development of the Notch, 1 home per acre, but rather exploit the allowances within City codes and erect 4 houses per acre. This will completely alter and endanger the character of our neighborhood. The requirements that accompany such development will include upgrade to our gravel roads, with the attendant higher speed and denser traffic flow, and the likely inclusion of a connector road between the bordering developments running through the Notch. None of these elements are in keeping with the philosophy of maintaining local environment. Further, added housing will contribute to the pollution and degradation of the Patterson Creek 23 Wetlands noted in the King County Wetlands Inventory. The 4 acre pond in this wetland already suffers from runoff from the surrounding development which is of much lower density and further removed.</p> <p>The Notch is not some undeveloped section of land ripe for development. Its lineage can be traced back to the original homestead patent in 1894. It reached its current lot configuration by 1979 (one transfer between lots excluded). It contains 21 homes, all but 2 of which were built before 1980. This predates the city of Sammamish and the developments that surround it. The cited non-compliance with the existing RA-5 zoning stems from the fact that that zoning was imposed after the lots existed.</p> <p>The intent of the Comprehensive Plan as part of the Growth Management Process is to do just that – manage growth, not facilitate development. The City of Sammamish has the necessary area to accommodate development through 2035. It does not need this land. The ancillary issues of control and maintenance of Duthie Hill Road could be resolved via an interlocal agreement with King County., Change to the UGA and inevitable annexation to Sammamish is not needed.</p>		<p><i>See responses at Darin Goehner (Moss Adams) below.</i></p>

ROBERT BRAEUTIGAM – DUTHIE HILL NOTCH AREA ZONING STUDY	
COMMENT	RESPONSES
<p><i>From: Robert E. Braeutigam [mailto:rebraeutigam@comcast.net]</i> <i>Sent: Tuesday, January 05, 2016 11:41 AM</i></p> <p>We agree whole heartedly with the staff recommendation in the Area Zoning Study #7 of the Draft 20106 King County Comprehensive Plan dealing with a proposal to change to Urban Growth Area to include the Duthie Hill Notch - “Do not go forward with this proposed unmitigated change to the UGA line.”</p> <p>However, we just as whole heartedly disagree with the subsequent part of the recommendation – “but consider a Four to One proposal developed through the GMPC process or through direct application to the program.”</p> <p>Our objections and concerns might best be summarized by the following excerpt from the January 3 editorial in the Seattle Times, opposing change to the UGA in general: “<i>So there’s not a shortage of space to build homes. Changes are sought because developers would prefer to build in more lucrative areas, where they’re now limited by land-use rules.</i></p> <p style="padding-left: 40px;">As long as the region has capacity for all growth insight, elected officials should stand firm and uphold the Growth Management Act. Its principles are needed now more than ever.”</p> <p>In the following material we would like to outline the background of our area and then address the procedural and technical objections we have to incorporation into the Urban Growth Area, which make it vulnerable to inevitable annexation by the City of Sammamish. We would also like to address some misrepresentations of our area that have been presented at various County Council meetings and committee meetings and public hearings.</p> <p>History <i>(note: maps shown following the text)</i> It has been stated that the Notch was formed for political reasons to oppose annexation to the City of Sammamish. In fact, the Notch began as an undefined portion of a land patent for a quarter section (160 acres) granted to J.R. Dobson in 1894. Ownership of 80 acres subsequently passed through the Allen and Nelson Mill Company and the Bratenober Lumber Company. As indicated on the enclosed Kroll Co. map of 1930 other individuals purchased the remaining 80 acres. In 1951 a 46 acre portion of the land with the current boundaries of the area that came to be known as the Notch was sold to Henry C. and Elsie B. Glein. The remaining portions were sold to four other buyers as noted on a Kroll Co map of</p>	<p>Comments noted; see response above and see <i>responses at Darin Goehner (Moss Adams) below.</i></p>

ROBERT BRAEUTIGAM – DUTHIE HILL NOTCH AREA ZONING STUDY	
COMMENT	RESPONSES
<p>1958. Between 1963 and 1965 the area was sold in 5 parcels to 4 buyers, with the parcels ranging in size from 4.8 to 18 acres. By 1968 it had had been subdivided into 16 parcels ranging from .94 to 7.14 acres. By 1979 further subdivision resulted in 20 parcels, ranging in size from .62 to 7.14 acres. Transfer of land from one parcel to another resulted in the final lot configuration in 1993.</p> <p>The entirety of that quarter section was zoned F- Forestry Land, as indicated on zoning maps as late as 1940. We have not been able to locate zoning maps for the period between 1940 and 1978, however in 1978 the entire area north of Duthie Hill Road was zoned “G-(Potential SR)”. The G classification allowed for lot sizes of 35,000 square feet. In 1983 it was rezoned as G5 (Potential SE) by enactment of an ordinance of the King County Council adopting the East Sammamish Community Plan. That zoning specified a maximum density of one house per five acres but allowed for rezoning as Suburban Estates with an approved Master Plan for developments over 500 acres or a Planned Unit Development for a development under 500 acres. At this point all lots were at their current sizes with the exception noted above of two parcels which exchanged 2 acres resulting in both becoming 5 acre parcels. The zoning of GR-5P was confirmed in King County Resolution 9365.</p> <p>Much has been said or implied about the fact that some of the existing parcels are not compliant with the current one house per five acre zoning, RA-5. This progression in zoning is pointed out to establish the fact that all the lots were legally established within the extant zoning codes. The fact that some lots do not comply with the current RA-5 zoning stems from the fact that that zoning was applied after the existence of the lots.</p> <p>In 1993 the Trossach’s development was plated. With it came a zoning request that would have rezoned the Notch at RS15000. Hearings were held over the course of 3 days in May 1993. As a result, Trossachs received a zoning of RS-15000-P and the Notch a zoning of AR-5-P following the definitions of King County Resolution 25789 and subsequently as RA-5-P in accordance with the 1993 Zoning Code, the zoning designations being equivalent. By 1994 Trossachs was zoned as R-4 as it remains today. The Notch is designated as RA-5.</p> <p>Designation as the Duthie Hill Notch</p> <p>Even at this point the Duthie Hill Notch had no specific name nor was there a defined homeowners group or association. Some property owners did participate in an informal group known as the Ridge Runners, comprising property owners along Duthie Hill Road and Issaquah Fall City Road who were interested in land related issues on the southern extent of the Sammamish Plateau, most specifically Grand Ridge. The designation as the Duthie Hill Notch emerged in the fall of 2007 when the City of Sammamish began its first efforts to change the UGA and annex our area. With those efforts the property owners within the</p>	

ROBERT BRAEUTIGAM – DUTHIE HILL NOTCH AREA ZONING STUDY	
COMMENT	RESPONSES
<p>Notch coalesced into two groups, either opposing or favoring a change in the UGA and annexation.</p> <p>Shift In Attitude on Annexation When annexation was first discussed, the majority of the property owners opposed the idea by a margin of 11 owners of 13 parcels opposing and 7 owners of 7 parcels favoring. Since then deaths in two families, purchase of a parcel by an LLC, and a simple change of position have altered that balance. Now, the owners of 7 parcels oppose annexation while the 11 owners of 13 parcels favor it. The balance by land area is 21.6% opposed and 78.4% in favor and by land value 38.1% opposed and 61.9% favor.</p> <p>But the numbers do not tell the complete story. The major drivers behind the UGA change and annexation are the owners of 2 five acre parcels and an LLC which owns the third 5 acre parcel and in which a resident of the Notch is a participant. Those three individuals have expressed an intent to develop at an intensity similar to Trossachs, namely R4 or more. They have rejected any discussion of limiting development to 1 home per acre, consistent to the rest of the Notch. A fourth parcel of 7.37 acres is held by a family trust. A death in the family has led them to seek ways to divide the property and settle the estate, hence they favor annexation which would permit them zoning to do just that. The owner of a 3 acre lot which has one house on it was adamantly opposed to annexation. Unfortunately she has passed away and her son is seeking other long term options. The owner of a 3.7 acre parcel has not been committal on plans but does want the option open to develop her property. Her former husband had been very active in opposing Trossachs and the infringement upon our neighborhood. The other lots are owned by those who wish to draw maximum financial benefit from their properties; some are non-resident realtors, others are resident builders, and still others property owners who simply want to see if there is benefit to the change.</p> <p>Why Do We Oppose a UGA Change? In the end, approving this change in the UGA is tantamount to approving annexation to the City of Sammamish.</p> <p>If the change in the UGA boundary is approved our area will be identified as a Potential Annexation Area for the City of Sammamish. The City has made it clear they desire to annex our area. Those in favor of annexation hold a sufficient majority to implement annexation via the Direct Petition Method (60% Petition). That would require submittal by the property owners of two petitions for annexation. They must first submit a petition signed by the owners of at least 10% of the total property value.. The city would accept, reject or modify the annexation. A second petition, signed by the owners of 60% of the total property value would then be required. The city would hold a public hearing and then accept or reject that petition. Given the position and actions the City has taken to date it is doubtful they would reject either</p>	

ROBERT BRAEUTIGAM – DUTHIE HILL NOTCH AREA ZONING STUDY	
COMMENT	RESPONSES
<p>petition. The petition is then reviewed by the Boundary Review Board which may expand or contract the area. Given we are surrounded on three sides by the City and on the fourth side by rural land and a county park, it is not likely they would recommend any changes. Assuming this is no obstacle, the annexation would be finalized by adoption of an ordinance by the Sammamish City Council.</p> <p>What Do We Object to In the Current Process to Change the UGA? As well documented in the Area Zoning Study #7, expansion of the UGA to include the Duthie Hill Notch fails to meet any of the three criteria of County Wide Planning Policy DP-16. 1) The land is not necessary to meet the growth requirements of Sammamish, as acknowledged in the City’s consultant’s own report to the City. 2) There is no land available for a Four-to-one exchange that meets the requirements of DP-16. Specifically, there is no open space contiguous to the Notch within the City. 3) Finally, the Notch is not a park to be transferred to the city.</p> <p>The expansion of the UGA to include the Notch fails to meet criteria (f) of DP-17. Namely, the Notch is not “free of environmental constraints to be able to support urban development without significant adverse environmental impacts.” The pond within the Notch noted in Area Zoning Study #7 is listed in the King County Wetlands Inventory as Patterson Creek 23, a category 2 wetland. The portion of the pond within the Notch is in fact approximately 4 acres of the noted 7.6 acres in the Wetlands Inventory. The pond drains to the south onto the Mystique Ranch, 16.6 acres of rural land where livestock are kept. It then continues through Duthie Hill Park and down to Patterson Creek.</p> <p>The pond already exhibits contamination from runoff from the High Country development in the form of a thin oil sheen on the surface. A five acre lot northeast of the pond was cleared in preparation for construction that did not come about. That has resulted in excess run off into the pond as well as onto the property just north of it. That has caused moisture damage to the house on that lot as well as additional runoff into the pond. The amount of clearing that would come with the planned development would dwarf these effects, both on the pond and the neighboring property. It certainly will jeopardize the livestock on the Mystique Ranch.</p> <p>Harder to quantify or describe is the impact on wildlife. The Notch is a wild life corridor. Flocks of ducks and geese regularly fly through our neighborhood, land and feed in our yards. Deer frequently rest among the trees on our properties and feed on the shrubbery. There is even the occasional bear that passes through. Fish populate the pond, otter can be found playing in it, and eagles nest in nearby trees. . All of this will be sorely disrupted, if not halted, when additional housing is added to our neighborhood.</p>	

ROBERT BRAEUTIGAM – DUTHIE HILL NOTCH AREA ZONING STUDY	
COMMENT	RESPONSES
<p>Why Do We Oppose Annexation?</p> <p>The Notch now consists of 18 homes and 1 mobile home on 20 lots covering 46 acres. With the R4 zoning that is allowed by Sammamish ordinances and process, combined with the intent of the property owners there is the potential for the addition of 60 to 100 homes, dependent upon any constraints uncovered during the permitting process or complications uncovered during the planning. This will increase the housing density in the Notch 4 to 6 fold. That increased density will bring several problems, besides the environmental ones already cited.</p> <p>The necessity to bring in public water and sewer will likely dictate construction of a road connecting SE 25th St in Trossachs with SE 25th Street in Windsor Heights (High Country). This is strengthened by the fact that the City of Sammamish has stated a preference for connecting these two stub roads. This will The Duthie Hill Land Use Study, prepared by 3MW, consultant to the City of Sammamish, included a traffic analysis of the flow on such a connector road. Using an assumption of only 14 or 55 new residential homes (consistent with R1 or R4 density) the study nonetheless predicted traffic flow of from 410 to 1290 trips per day along such a road by 2035. That level of traffic will have a significant effect on the residents along 25th St in High Country. That road is not designed to handle that level of traffic.</p> <p>Should that road not be developed then different problems arise with 268th Pl SE, 270th Ave SE and 271st Ave SE. All are private, gravel roads, defined by easements on private property. Current County and City of Sammamish ordinances require improvement of those roads should any development occur along them. The cost of any improvements would fall on the developers, however, the negative impact of those roads would be borne by all the residents along them. If the roads were improved that would increase both the level and speed of the traffic along them. This will create a safety hazard for those who live along the roads, especially where high embankments and denser trees impede visibility. It will also introduce a temptation for residents of Trossachs to use 271st Ave SE as a shortcut to Trossachs, as some already do.</p> <p>Should a 25th St connection be built it will be accompanied by pressure to link 271st Ave and possibly 270th Ave to it to provide emergency access to Trossachs. This potential has already been raised in early discussions with emergency services personnel. Once done, that would guarantee heavy and fast traffic in front of our homes.</p> <p>No matter the configuration, if any additional homes are added to the current three access roads they will introduce an increase traffic hazard along Duthie Hill Road. The Notch is located on a very dangerous curve in the road. Site lines are at their lowest limit. Cars already exiting the Notch face lengthy delays for traffic to clear and the additional hazard that cars exiting the turn have not seen them in time. It is</p>	

ROBERT BRAEUTIGAM – DUTHIE HILL NOTCH AREA ZONING STUDY	
COMMENT	RESPONSES
<p>exactly this hazard that caused the County to build a new parking lot for the Duthie Hill Bike Park to a location a mile away along Issaquah Fall City Road.</p> <p>Admittedly, the exact road configuration cannot be known until planning proceeds to a point of better definition. However, it is certain that homeowners will be faced with legal costs to defend and protect their property and safeguard against traffic hazard and nuisance noise.</p> <p>Larger Traffic Issue and Sammamish’s Justification The City of Sammamish and Council Member Lambert have stated the reason for annexation is to make sense of the UGA boundary and to place Duthie Hill Road under the jurisdiction of the City.</p> <p>On the first point, there are numerous examples of irregularities of the UGA boundary throughout the County. There is no reason to adjust the boundary for that reason. . To do so for the Duthie Hill Notch would, and must open the question for the other approximately 25 notches that exist.</p> <p>On the second issue – it has been stated that the County does not have the funding to maintain or upgrade the portion of Duthie Hill Road that fronts the Notch and that the only way to secure that funding is by placing the road within the jurisdiction of the City of Sammamish. The City has similarly said they would not take responsibility for the road unless it, and the Notch were annexed to the City. They would then upgrade the road and improve traffic flow. The City is faced with a similar situation in the planned improvement of Sahalee Way as it approaches SR 202. The County owns the portion of the road between Sammamish and SR 202. Improvement of Sahalee Way within Sammamish would do no good if it terminates in an unimproved bottle neck at the County portion of the road. According to a report in the Sammamish Comment on July 14, 2015 a Sammamish Council Member reported after meeting with a County Council Member that grants could be obtained to improve the county’s portion of the road. If the City and County can work together there why can they not do so on Duthie Hill Road?</p> <p>The City’s prime motivation appears to be improving traffic flow along Duthie Hill Road, which is driven primarily from traffic generated by the over 1100 homes in Trossachs, Aldarra and Montaigne. This problem was caused by the platting of these developments such that they each have one, and only one, common outlet/inlet – Duthie Hill Road. The solution to the traffic issue is not to increase speed and capacity on Duthie Hill, but rather to pursue other avenues of ingress and egress to those development. Before the County commits to a change in the UGA for the sake of improving this road a serious study of the other alternates should be undertaken. We do not claim these would be either easy or inexpensive but a large problem was created by the siting of these developments and it should be expected it would take some effort to correct it.</p>	<p>Discussions are continuing between the county and city regarding other options for Duthie Hill Rd.</p> <p>Comments noted</p>

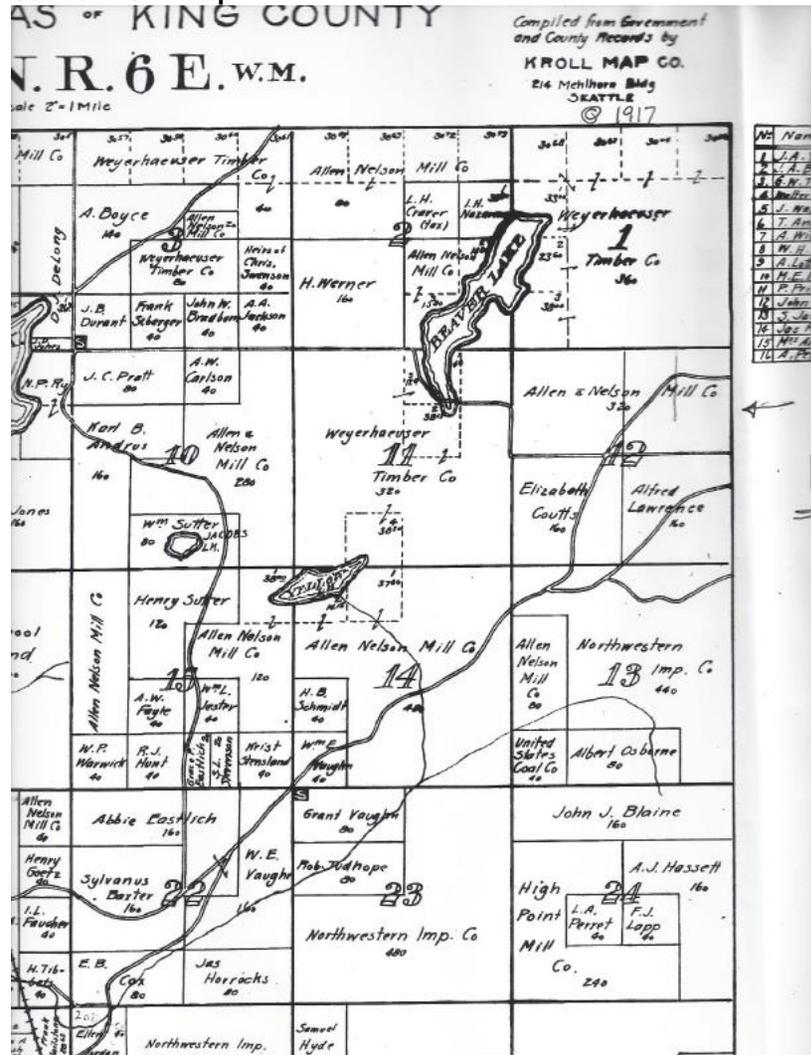
ROBERT BRAEUTIGAM – DUTHIE HILL NOTCH AREA ZONING STUDY	
COMMENT	RESPONSES
<p>Property Tax Concerns Much has been by the City of Sammamish about how our taxes would go down. And it is true that the rates in the City are slightly lower than in the County. However, nothing has been said about the effect of annexation and rezoning on the assessed value of our land and houses. It is not possible to get a forecast of property values from the County Assessor's Office that address potential property assessments should our area be rezoned as R-4. We have made that request, as well as has the City of Sammamish. However, assessed values for the small lots in Trossachs run very close to the assessed values for the larger lots in the Notch. We are confident that our land values will increase as development encroaches, and with it, our taxes. It stands to reason that an acre of land would have a higher assessed value if that land can accommodate 4 houses rather than just one. That has been the experience of every property owner we have talked with who has experience with similar situations.</p> <p>Transparency and Community Involvement We have concern that the attempts by the City of Sammamish to find alternate ways to justify a change in the UGA and facilitate annexation to be less than transparent and are being approached in a manner that puts a property owner at a disadvantage to follow.</p> <p>In July the City of Sammamish presented the Growth Management Planning Council with an approach that would have made the change to the UGA a minor adjustment, not subject to the Comprehensive Plan process. That plan was to revise DP-16 to add a fourth criteria that would justify a change in the UGA. To wit,</p> <p style="padding-left: 40px;">d) The area is less than 50 acres and is surrounded on at least three sides by urban area and the fourth side by a natural or manmade barrier to further UGA expansion, such as an arterial roadway.</p> <p>Human error caused us to miss the Sammamish meeting at which this was discussed, and consequently the GPMC meeting that followed. However, we did attend the Nov GPMC meeting at which it was established that the GPMC deferred action on this approach and instead directed that the City work with County Staff to investigate a Four-to-One Exchange. Nonetheless, this amendment was clearly tailored to address the Notch, despite potential application to the numerous other notches that exist. Attempting to inject a change outside the Comprehensive Plan process in which it would receive full and public scrutiny violates the principle of transparency.</p> <p>The GMPC direction to study the application of the allowable Four-to One provision of DP-16 (b) is</p>	

ROBERT BRAEUTIGAM – DUTHIE HILL NOTCH AREA ZONING STUDY	
COMMENT	RESPONSES
<p>similarly less transparent than is expected and done so at the disadvantage of the homeowners involved in this case. The city has no land to exchange that meets the requirements of DP-16(b) and appeared to be unwilling to exchange and/or purchase land to exchange located elsewhere within the city to effect such a change. Had the established Four- to- One requirements been adhered to there could be no argument over the process. However, to simultaneously seek a revised process to permit the exchange of non-contiguous land is again outside the desired transparent process. The City of Sammamish is represented on the GMPC, those of us who are vitally interested in this issue, are not. This imbalance of representation and participation does not align with the stated intent for transparent processes. We have relied on the Comprehensive Plan revision process to track this issue that is so important to us. We have waited patiently for the steps to unfold. We should not have to track another, albeit related, process as well.</p> <p>Conclusion</p> <p>We are not opposed to inclusion in the UGA and annexation in themselves. Nor are we attempting to deny others opportunity to live in our neighborhood, or, for that matter sell their land to others who wish to live here. It is the changes annexation and development will bring about in terms of damaging the environment and the atmosphere of our neighborhood that we object to. Our neighborhood will go from a rural environment to another hard surfaced development designed to accommodate a lot of people and traffic. We all bought our properties for the environment they provided. In fact, some of those now in favor of annexation bought their properties for the same reason. We would like to be able to retain what we bought.</p> <p>Robert E. Braeutigam <i>Also sent on behalf of Peggy Braeutigam, Vincent and Martha Learnard, Elke Lewis, Kim and Lidia Wiersum, Terrance and Kari Kuhn, Harry Strouse and Susan Brantley</i></p>	

ROBERT BRAEUTIGAM – DUTHIE HILL NOTCH AREA ZONING STUDY

COMMENT

Section 1912 Map



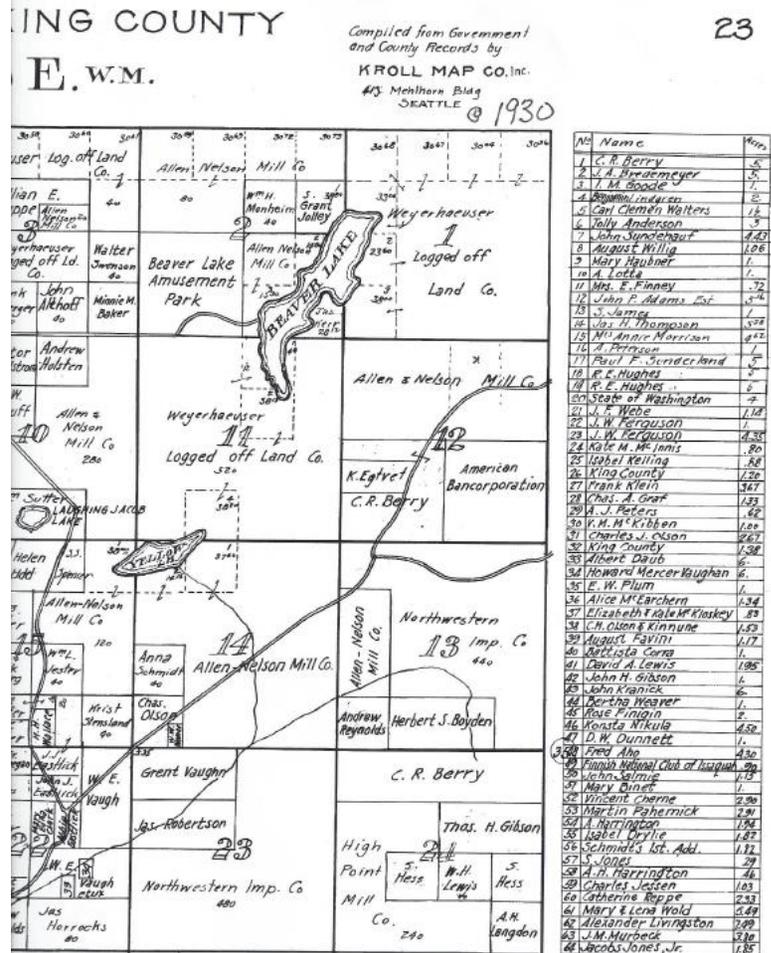
RESPONSES

ROBERT BRAEUTIGAM — DUTHIE HILL NOTCH AREA ZONING STUDY

COMMENT

RESPONSES

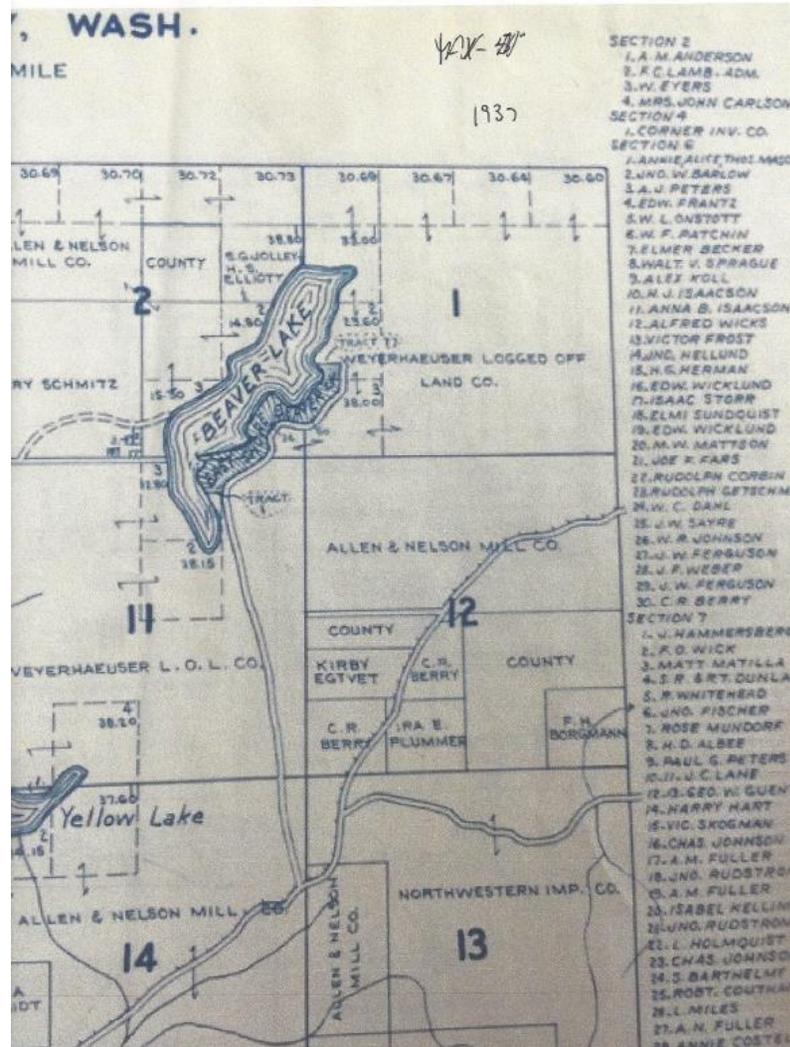
Section 1930 Map



ROBERT BRAEUTIGAM — DUTHIE HILL NOTCH AREA ZONING STUDY

COMMENT

Section 1937 Map



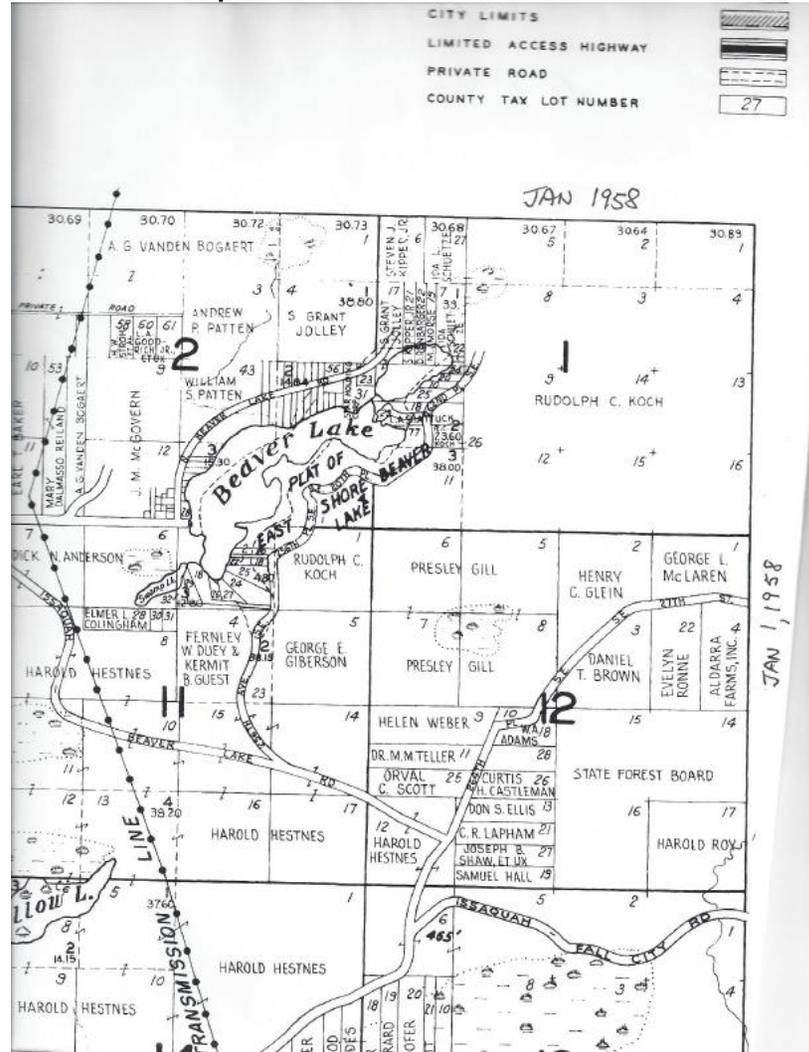
RESPONSES

ROBERT BRAEUTIGAM — DUTHIE HILL NOTCH AREA ZONING STUDY

COMMENT

RESPONSES

Section 1958 Map

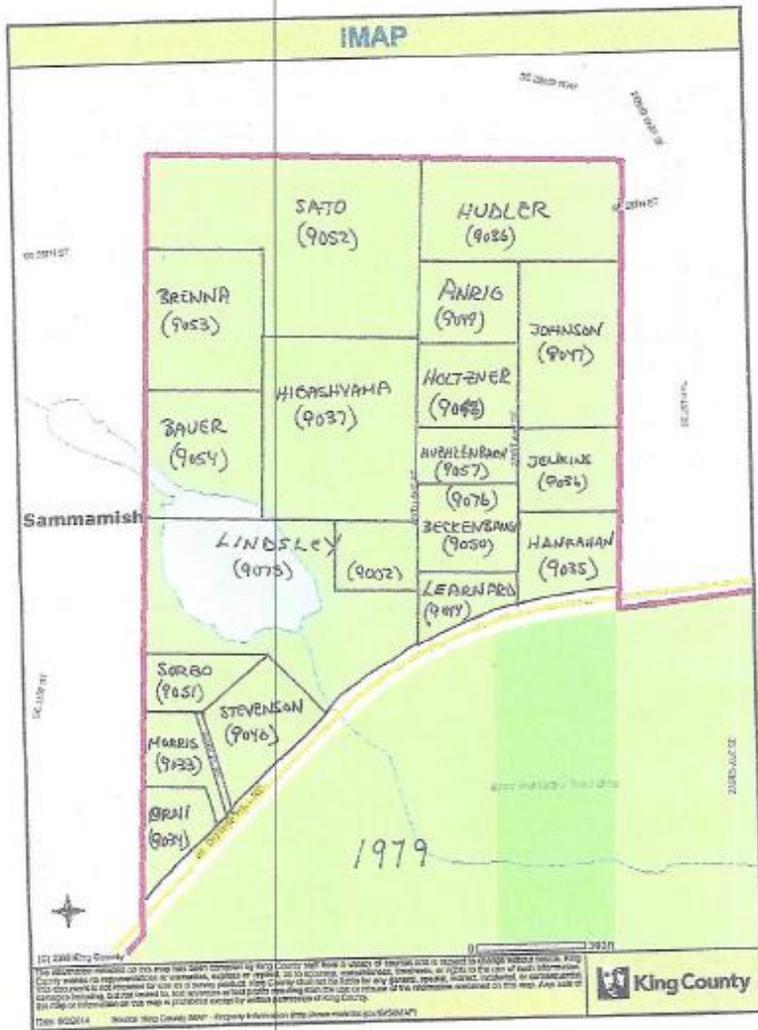


ROBERT BRAEUTIGAM – DUTHIE HILL NOTCH AREA ZONING STUDY

COMMENT

RESPONSES

Section 1979 Map



SONJA AND BILL BOWDEN — ENDORSEMENT OF SKYWAY WEST HILL ACTION PLAN, WITH CAVEATS	
COMMENT	RESPONSES
<p><i>From: Sonja Bowden [mailto:sonja@vegcat.me] – West Hill Association</i> <i>Sent: Tuesday, January 05, 2016 8:14 PM</i></p> <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>January 5, 2016</p> <p>To: King County Executive Dow Constantine Re: SWAP Endorsement</p> <p>Dear Executive Constantine:</p> <p>The board members of the West Hill Community Association appreciate the considerable effort by Skyway Solutions that went into creating and drafting the plan known as SWAP. The West Hill Community Association supports the efforts of all the organizations and King County agencies that have been working to bring investment and revitalization to the West Hill, especially to our dying business district.</p> <p>WHCA has been active in this community for 25 years, and as an organization it has considerable historical insight, having been a quasi-governmental organization for most of those years. The West Hill Community Council, now known as WHCA, helped draft the 1994 Comprehensive Plan Update so we are well-aware of current issues and what has and hasn't been accomplished since then.</p> <p>In sum, while the WHCA board has voted to endorse the overall effort to create the SWAP, individuals on the board have added caveats about content and/or process:</p> <p>The SWAP was written by Skyway Solutions in their own language according to their organization's individual agenda, then presented to the community for buy-in via a survey. The SWAP wasn't drafted through an all-inclusive process designed to engage residents in all the existing neighborhoods from the ground up. There are undoubtedly residents and neighborhoods that haven't heard anything about the SWAP, because publicity was extremely weak.</p> <p>The survey itself did not capture a representative, statistically-valid sample of the demographic makeup of the community. It was weighted towards women and it didn't adequately include nor represent Hispanics or Asians, two of our fastest-growing populations. Categories such as "residents" didn't distinguish between renters and homeowners. Homeowners have a different stake than renters. In the 4th table, the "other" category isn't defined. A comprehensive plan needs to be fully inclusive of the entire community, not targeted to specific groups, economic levels or other limiting factors, and it should not incorporate personal ideology. It should also be formulated by residents, not those living outside the community.</p> <p>Following is the chart provided by Skyway Solutions that indicated that the survey wasn't weighted evenly to all groups, categories or neighborhoods.</p> </div>	<p>Comments noted regarding the efforts of the process that led to the creation of the SWAP.</p> <p>As you are aware, staff from the Department of Planning and Environmental Review provided support, via Motion 14221 that directed the department to be involved in the community planning process.</p> <p>Staff worked in recent months with the leadership of Skyway Solutions and County departments to develop an implementation matrix that creates clearer expectations for how the Plan gets implemented. We appreciate that the West Hill Community Association is able to support the adoption of the SWAP.</p>

SONJA AND BILL BOWDEN — ENDORSEMENT OF SKYWAY WEST HILL ACTION PLAN, WITH CAVEATS

COMMENT

RESPONSES



The SWAP calls for increased low income housing, which often means tax-exempt development. It also calls for free public services with little in the way of tax-revenue providing businesses.

While we can back the desire for affordable housing, we need to be sure that the tax structure supports what is built so that services provided by the Fire District don't get stretched too thin. Currently, 20% of medical calls responded to by Fire District 20 go to Creston Point, a tax-exempt housing complex. We also have Greentree and Park Hill Apartments, which are tax-exempt. Both Fire District 20 and King County Sheriff's Office devote a disproportionate amount of resources to these subsidized-rent complexes. The Fire District budget can't afford to take on any more of this type of housing without additional financial support. Additionally, low-income housing should be spread throughout the region, not concentrated in places with the most limited financial and social resources (urban unincorporated) rather than in cities that enjoy greater sources of taxation along with requirements for developers to contribute financially to maintain viability.

The SWAP talks about keeping market rate housing rates low so that all can afford homes. While this sounds appealing at first glance, we already have some of the lowest housing prices in the Puget Sound. Property owners are investors and they have a reasonable expectation to see values appreciate, which also contributes revenue to county tax coffers.

Comment noted regarding the affect of low-income housing on revenues. This will be an important issue to be aware of as the plan moves into adoption.

SONJA AND BILL BOWDEN — ENDORSEMENT OF SKYWAY WEST HILL ACTION PLAN, WITH CAVEATS		
COMMENT	RESPONSES	
<p>through property taxes. It isn't realistic to think that the Comprehensive Plan can control market rates. The affordable housing issue is something that needs to be addressed at higher levels of government with grander solutions such as better education leading to jobs and improved wages. Some of the issues in the SWAP are more suitable to be handled region wide through policy changes.</p> <p>The SWAP is explicitly anti-gentrification. Gentrification can be looked at as displacement or improvement or both. We have a business district in desperate need of outside investment which the anti-gentrification message might well discourage. If local owners were interested in maintaining and improving their buildings, it would have happened by now. We need a study to analyse what was originally here, why it left, and what would make this area thrive once again.</p> <p>One of the unique assets about this area both historically and currently is that we have fairly good-sized yards, which are highly-coveted. Residential lots in Seattle tend to be much smaller. The SWAP calls for greater density on single family lots in order to keep this area affordable. Adding density to single family residential lots by encouraging more accessory dwelling units and home additions will increase the need for parking and utilities and other services while shrinking yard, garden, green space and trees and reduce the unique character of this community. Greater density is more appropriate for the business district, where there can be Smart Growth, with retail below, ample parking and housing units built vertically.</p> <p>We would like to see some language in the SWAP addressing local initiatives to combat climate change in a 20-year plan.</p> <p>Marijuana stores are a reality now. The SWAP should address a reasonable concentration of retail stores in proportion to our population and revenue taking into consideration the extra law enforcement services required to provide security since the legal trade also brings illegal trade along with it. An oversaturation of pot stores is a matter of equity and public health.</p> <p>The SWAP calls for building a Community Center. Estimated cost by Skyway Solutions for construction alone was \$14M. It would be desirable to have a community center, but it isn't realistic. Skyway had a community center that was sold to the Boys and Girls Club because the county didn't have the resources to sustain it. Our new library will function well as a community center.</p> <p>In the plan, the names "West Hill", "Skyway", "Skyway/West Hill", "Skyway-West Hill", "Skyway West Hill" & etc., are used interchangeably. While sources such as the Urban Unincorporated designation, the CDP designation and local vernacular differ widely, the primary designation of this unincorporated area is "West Hill". West Hill is defined as the eight neighborhoods of Bryn Mawr, Campbell Hill, Earlington, Hilltop, Lakeridge, Panorama View, Skycrest and Skyway which comprise the unincorporated portion of King County situated between Renton, Seattle and Tukwila. Skyway is but one neighborhood amongst many, and limiting the focus and emphasis to one neighborhood neglects and undervalues the several other neighborhoods</p>	<p>The County appreciates the need for and community concern around a diverse business community, but, as a regional government, does not have direct economic development functions. The City of Seattle is a provider of local government services and has an office of economic development to help its neighborhoods.</p> <p>Comments noted regarding climate change. Importantly, a wide range of new policies have been added to the 2016 Plan to address this topic and reflect the County's work on the Strategic Climate Action Plan and King County Cities Climate Collaboration (K4C).</p>	

SONJA AND BILL BOWDEN — ENDORSEMENT OF SKYWAY WEST HILL ACTION PLAN, WITH CAVEATS		
COMMENT	RESPONSES	
<p>which also contribute to making our community strong and vibrant. Without strong, consistent and accurate naming, there are significant consequences which result in weakened communication, confusion amongst neighbors, a sense of disunity and even a disconnect between local officials and their constituency, as has been demonstrated time and again. The plan's stated goals of promoting the neighborhood via concerted marketing efforts, improving community-wide communication and others directly conflict with the widely inconsistent naming. This update to the plan should serve to strengthen our understanding and sense of identity, and act as a tool to aid in growing and improving communication both within and outside our community so that we can continue to move forward together effectively.</p> <p>This area above all needs strengthened code enforcement and improved security. It also needs strong urban planning for the business district. None of these areas were emphasized in the SWAP.</p> <p>Last but not least, we want you to be aware that all the board members support a strong plan and funding for this community, but there have been recent concerns about ethics that caused some of us to want to withdraw support for SWAP altogether.</p> <p>Sincerely,</p> <p>Bill Bowden President, West Hill Community Association</p>	<p>Comments noted regarding the important of Code Enforcement. The Department of Permitting and Environmental Review is working to improve their code enforcement process.</p>	

C

TOM CARPENTER – INTERJURISDICTIONAL ISSUES	
<i>Four Creeks -- Maple Valley – SE King County Area Community Meeting Comment Card</i>	
COMMENT	RESPONSES
<p>Some very encouraging topics being included in the KCCP (e.g. subarea planning, PAAs, etc.).</p> <p>Seams between jurisdictions are sub-optimizing efforts in area that don't respect jurisdictional boundaries (water, mobility, etc.) Need stronger leadership; like KCCP statements to lessen the negative impacts of jurisdictional seams.</p>	<p>Comments noted. Agree that many of the challenges to implementing GMA relate to interjurisdictional issues (i.e., the "seams" between jurisdictions). Additional responses shown below.</p>

TOM CARPENTER – MULTIPLE TOPICS	
COMMENT	RESPONSES
<p><i>From: Tom Carpenter [mailto:tdcarp@comcast.net]</i></p> <p><i>Sent: Wed., January 13, 2016 12:00 PM (NOTE: This is a resend of multiple emails transmitted prior to January 6, 2016)</i></p> <p>RURAL AREA</p> <p>REMOVE CONFUSION OVER THE USE THE TERMS “RURAL AREA”, “RURAL AREA”, “RURAL”, ETC. There were inconsistencies in the PRD regarding the use of terms to describe the area outside the urban growth boundary. Adding to the confusion is the term “Rural Area” used to describe the RA land use code. (See KCCP Land Use maps)</p> <p>Some discussion was to modify the 2016 KCCP to use Rural Area (capitalized) vs. rural area (lower case) to differentiate between the uses of the term. This might work, but perhaps it would be better to rename the Rural Area (RA) land use code.</p> <p>WHAT’S THE PURPOSE OF THE RURAL AREA (RA) LAND USE? The rural area of King County is dominated by four land uses: RA, FPD, APD, and Mineral, the last three grouped as Resource lands.</p>	<p>As you are aware, this bullet is included in the Scope of Work because the current plan uses the term "rural areas" to reference at least three things: the larger geographic area, the specific zoning categories, and the specific land use categories. The use of all of these terms has been updated throughout the entire plan.</p> <p>The Comprehensive Plan includes a significant number of policies that describe the low-density, mixed-use nature of the Rural Area, and</p>

TOM CARPENTER – MULTIPLE TOPICS	
COMMENT	RESPONSES
<p>King County Resource land uses are well defined, with clear objectives and policies that support their intent. The same cannot be said for the Rural Area (RA) land use. In the 2016 KCCP, the RA land use is grouped with the other rural lands, but receives no other attention.</p> <p>RA zoning includes RA 2.5, RA 5, RA 10, and RA 20 minimum, which describes the density, but little, if any, policies exist beyond the zoning permitted uses. Unfortunately, the perception is that the RA land use area is a property bank for urban expansion.</p> <p>Add text to the KCCP to 1) describe the purpose of the RA land use, and 2) define policies in support of the purpose.</p>	<p>specifically defines the different RA zones that you references as well as the Rural Town and Rural Neighborhood Commercial Center. Policy R-201 is includes perhaps the strongest statement of intent for these areas as a whole. That said, the intent of each of the specific zoning categories is found in multiple locations including the Zoning Code.</p>
<p>TDR</p> <p>SIGNIFICANTLY MODIFY THE TDR RECEIVING SITE POLICIES.</p> <p>From discussions with cities (e.g. Seattle), the TDR program has learned the following are required for TDR receiving sites:</p> <ul style="list-style-type: none"> • The location for the increased density must be planned, • There must be local resident support, and • There must be amenities as described in a community plan. <p>None of these conditions were even discussed for unincorporated urban areas that have received TDR density bonuses. The plateau east of Renton is a good example. Modify the TDR receiving site policies to guide the required criteria for locating density bonuses anywhere inside the urban growth boundary, whether the jurisdiction of a city or the county.</p> <p>Note that “amenities” include more that financing from sources like conservation futures dollars. Changes in priorities for things like CIPs or budget, if aligned to community needs, are acceptable “amenities”.</p> <p>T 224</p> <p>Remove any incentive for relief from obtaining a transportation concurrency certificate for development permitting based on the purchase of Transfer Development Rights. This was submitted as a docket and rejected. The reason seems to come down to the fact that this method for relief from Transportation Concurrency has never been used. It’s also debated that this will result in no net increase in traffic in the</p>	<p>See responses at <i>Tom Carpenter – TDR</i> below.</p> <p>This request is not reflected in the 2016 Comprehensive Plan. This request denied not because it has not been used, but rather because King</p>

TOM CARPENTER – MULTIPLE TOPICS	
COMMENT	RESPONSES
<p>Travel Shed eventually.</p> <p>It's assumed this policy is being supported for political reasons. However, it makes no sense to give relief for concurrency in any way.</p> <p>GENERAL TDR COMMENTS</p> <p>There are questions about the fairness and design of the TDR program. Please add a “check” policy to evaluate the TDR program as a whole.</p> <p><i>(See next comment letter with a list of some of the concerns about the TDR program in general)</i></p>	<p>County believes the current approach, which reduces overall development potential in rural areas by extinguishing development rights through TDR. Edits to the text are included in the 2016 plan to clarify the rationale for this policy.</p>
<p>FRINGE</p> <p>Lands in the urban growth boundary fringe are transition areas between two distinct land uses: urban and rural. Analogous to the natural resource “ecotone”, it's an area where these two land uses are in tension.</p> <p>There are unique transition areas along the fringe, defined by the multiple combinations of rural and urban land uses and zoning. Add text that recognizes the uniqueness of these areas and add policies that support the unique planning needed to support them.</p> <p>PAA</p> <p>Many, if not all, of the urban unincorporated areas are not getting the attention they deserve in the KCCP and in the business priorities that result from it.</p> <p>Looking just at the Renton PAAs, it's a pretty good bet that these 3 large areas will not annex to Renton any time soon.</p> <p>For years, King County has had policies to get areas annexed, but the efforts appear to be focused on working the rules on annexation with WA State. There are policies about working cooperatively with PAA cities, but that is not happening.</p> <p>If the county is not motivated to move UGBs back to current city boundaries because the cities have no interest in annexation, then county cannot continue to provide services to these area at the low level they are today.</p>	<p>Comments noted; the pressures for development and impacts from development in Cities in the Rural Area can be intense in these areas. They are where many of the Four to One transactions occur as well.</p> <p>At this time, the policies that exist in the plan speak to minimizing development pressure, reducing impacts, and permanently protecting these areas. Programs such as the Urban Separators program are intended to positively affect outcomes and protections in these areas.</p> <p>A number of changes are made related to potential annexations. The map has been clarified, policies call for quality development in these areas, support for joint planning in areas committed for annexation, and more. The plan also includes</p>

TOM CARPENTER – MULTIPLE TOPICS	
COMMENT	RESPONSES
<p>Add policies that prevent the county from treating the urban unincorporated areas, particularly the PAAs with any less attention than any other unincorporated area.</p> <p>ILA Provide a policy that states that there must be a planning ILA between the county and any PAA city. Make sure that ILA is developed with maximum opportunity for local resident input.</p> <p>UGB MOVE TO CITY BOUNDARIES Issaquah has recently determined they no longer have interest in a PAA near Cougar Mtn. The county is paying attention to the determination, but rejects resident requests to move the UGB back to the city boundary.</p> <p>The comments about annexation reviews in the 2016 KCCP need to be aggressively addressed and quick determinations need to be made if the UGB is going to be moved back. There's no doubt that the PAA on the plateau (the subject of the docket) will not be annexed anytime soon.</p>	<p>The 2016 Plan includes a Workplan item to engage in discussions with King County cities to revisit the Potential Annexation Area map and annexation countywide planning policies. The issues you raise are likely to be part of this future project.</p> <p>Comments noted regarding the challenges to having the Renton PAAs annexed. See responses to later comments on the East Cougar Potential Annexation Area request from the City of Issaquah.</p>
<p>SUBAREA PLANNING The county is to be acknowledged for the emphasis on subarea planning in the 2016 KCCP. However, the definition of “subarea” planning is questionable.</p> <p>LAND USE PLANNING In the PRD is the comment that subarea planning used to be called area zoning study. With the assignment of subarea planning to DPER, its apparent that the county is thinking of subarea planning as primarily focused on land use and zoning.</p> <p>This is not the definition used in the community. Useful subarea, community, and neighborhood planning need to be more comprehensive. The reference to the Skyway Solutions pilot is evidence of this recognition. The Skyway Solutions is far more comprehensive that just land use and zoning.</p> <p>SEQUENCE It's not clear what criteria are being used to determine the sequence for subarea planning. Places like Four Creeks/Tiger Mtn won't be up for such planning until 2023. It could be argued that because of things like the last plan being in 1985, the fact that the area has urban/rural fringe and a PAA, the work</p>	<p>The structure of the new subarea plans is much broader than the Area Zoning Studies. The Council specifically defined DPER to be the lead department for the new subarea planning program.</p> <p>In consultation with the departments, the 2016 Plan uses the Community Service Area boundaries. CSA Plans will include higher-level planning "profiles" as well as more specific "subareas" within the CSA. The focus will be on actionable items, across an shorter time-frame, and a broader higher-level vision for the</p>

TOM CARPENTER – MULTIPLE TOPICS	
COMMENT	RESPONSES
<p>already done on subarea, community, and neighborhood planning should be part of the sequencing criteria.</p> <p>CSA BOUNDARIES The CSA boundaries don't make sense as the area definition for subarea planning. It's not clear what criteria were used to create these boundaries, but it can be assumed it was not in preparation for subarea planning.</p> <p>Not unlike Travel Sheds, the boundaries for subarea, community, and neighborhood planning should have some integrating attribute. Unless changed now, the use of the CSAs will require an additional integration step to deal with land uses that cut across the CSAs.</p> <p>RB REZONE I challenge the RB zoning on parcel 1457500005. <i>(See separate comment letter on this parcel below)</i></p>	<p>area as a whole.</p> <p>The CSA boundary is used already in a number of programs and, given the staffing levels for the new subarea planning program, it will be important to leverage existing programs and networks. The issues of "integrating attributes" is important and the program will seek to address that in the smaller-scale subarea elements of the larger CSA Plan. Contact DPER for additional details.</p>

TOM CARPENTER – TRANSFER OF DEVELOPMENT RIGHTS PROGRAM COMMENTS	
COMMENT	RESPONSES
<p><i>From: Tom Carpenter [mailto:tdcarp@comcast.net]</i> <i>Sent: Wed., January 13, 2016 12:00 PM</i> <i>(NOTE: This is a resend of multiple emails transmitted prior to January 6, 2016)</i></p>	
<p>1. The TDR program continues the trend toward making the predicted expectation behind zoning less meaningful.</p>	<p>There are a variety of Residential Density Incentives (RDI) and commercial bonus density included in zoning codes – TDR is but one of these. Inclusion of RDI and commercial density bonus incentives is relatively common – albeit following the thread back to intent can sometimes be confusing and hard to follow.</p> <p>A proposed update to the 2016 Comp Plan (proposed after issuance of the Public Review Draft)</p>

TOM CARPENTER – TRANSFER OF DEVELOPMENT RIGHTS PROGRAM COMMENTS	
COMMENT	RESPONSES
	includes changes to text to clarify the intent of the use of TDRs to meet traffic concurrency requirements for subdivisions in failing travelsheds.
2. TDRs move an important density decision further away from open public debate.	Any substantive code updates related to the use of TDRs to achieve bonus density occur in context of Comprehensive Plan update cycle which has public review and debate opportunities. Development proposals using TDRs must also go through public review during permitting process.
3. TDRs are being used to bypass zoning.	TDR <i>relies</i> on zoning for the program to work, and the use of TDRs does not change or bypass any zoning rules. As mentioned above, TDR is one of a variety of bonus density options available to developers; the use of any types of bonus density incentives must comply with zoning codes.
4. TDRs are not being used for development in the areas intended.	<p>More than 500 TDRs are committed toward development projects in Seattle’s South Lake Union/Denny Triangle/Downtown areas – the most urban neighborhoods in the region. TDR agreements with other cities delineate receiving areas in urban center receiving areas. The Growth Management Act clearly establishes policy goals for steering new growth away from rural areas and into urban areas; TDR does this. In the life of the program there have been six Rural Area receiving sites for TDRs; four of these were used to increase accessory dwelling units by 500 sf, and two were sites where TDRs were used to achieve one dwelling per 2.5 acres in the RA 2.5 zone (and for both RA-2.5 uses, permitting was initiated for those short plats over 15 years ago.)</p> <p>Of the 392 TDRs redeemed at receiving sites to date, six have been used in the Rural Area.</p>
5. TDR development rights are not being purchased in the areas intended.	<p>Developers purchase of TDRs for use in receiving areas is described in the response above. “Sending sites” protected through certification of TDRs are reviewed carefully by TDR program staff to ensure they meet the open space criteria in the Revised Code of WA and are consistent with King County’s conservation goals and policies.</p> <p>In the last several years, revenue from TDR Bank sales has been used to protect more than 900 ac of farmland in King County. Total acreage of forest, farm, and rural areas lands protected exceeds 141,000 ac.</p>
6. TDR program implementation is inconsistent with comprehensive and community plans.	TDR policies and implementation are guided by the Growth Management Act and the Comprehensive Plan. The 2016 Comprehensive Plan proposes updates to include additional study of unincorporated urban TDR receiving sites before allowing developers to use TDRs in their projects.
7. How much conservation easement land is enough?	Permanent protection of rural and resource lands has innumerable benefits for the integrity of the landscape and the well-being of human society. Exactly how much is enough is a debatable question, but King County carefully considers public benefits associated with each potential TDR sending site.

TOM CARPENTER – TRANSFER OF DEVELOPMENT RIGHTS PROGRAM COMMENTS	
COMMENT	RESPONSES
8. Will TDRs actually preserve farmland?	Yes. To date, more than 900 acres of farmland has been preserved through TDR. The agreement with Seattle is likely to generate an additional \$12 million to \$15 million in the next several years, much of which will be directed towards additional farmland protection.
9. Are the sending sites targeted by conservation organizations like Forterra actually conservation priorities?	To answer the question KC would need to review specific sending sites proposed by other entities.
10. The distribution of development rights is the distribution of wealth, and wealth distribution formulas raise equity issues at least as severe as those involved in rezoning.	The TDR program model does not <i>generate</i> the development rights being traded (i.e. does not establish the “distribution of wealth”), only provides a voluntary market-based means for TDRs to be exchanged through time and place.
11. The TDR program is an “artificial” market and therefore the natural balancing forces of a free market do not have an effect.	Demand in environmental markets is usually driven by regulations, but voluntary and free market principles do still apply. For example, if TDR prices are set at amounts developers are not willing to pay, they will not purchase TDRs.
12. TDRs have a negative effect on housing affordability.	Use of TDRs generally results in additional housing stock (more units) and also smaller units (more compact developments). Smaller units are likely to be more affordable, and increase in supply is also likely to increase housing affordability.
13. The economic model on which the TDR program is based places the financial burden for funding the land conservation on those that can least afford it.	In the TDR model the cost of conservation is largely covered by developers (i.e. conservation is achieved using revenue of TDR sales to developers). If developers couldn’t afford to buy TDRs, they wouldn’t (use of TDRs is voluntary).
14. The TDR program hides the actual costs of conservation.	The TDR website has data regarding all TDR Bank purchases: http://www.kingcounty.gov/environment/stewardship/sustainable-building/transfer-development-rights/bank/bank_purchases.aspx
15. The TDR “system” is highly complex which makes it difficult to understand and analyze.	TDR Program staff provide technical assistance upon request. Also, the TDR website has a great deal of information: www.kingcounty.gov/tdr
16. TDR advocates are proposing more rural receiving sites which impacts the fragile rural economics, lifestyle, and	There is no KC proposal for more Rural TDR receiving sites. Adding Rural receiving site options would be inconsistent with the intent of the TDR program. There are three existing potential uses for TDRs at rural receiving sites:

TOM CARPENTER – TRANSFER OF DEVELOPMENT RIGHTS PROGRAM COMMENTS	
COMMENT	RESPONSES
infrastructure.	<p>(1) To realize 1 du/2.5 ac in RA 2.5 zones (TDRs have been used this way twice);</p> <p>(2) To increase the size of an allowed Accessory Dwelling Unit from 1000 sf to 1500 sf. (TDRs have been used this way four times);</p> <p>(3) To allow a detached ADU (rather than only and attached ADU) on certain size RA-5 properties; and</p> <p>(4) To satisfy traffic concurrency requirements for subdivisions in rural zones of failing travelsheds. (To date, TDRs have never been used for this purpose.)</p>
17. King County is providing incentive funding to cities to accept TDR receiving site but ignores its own urban unincorporated areas.	There is a proposed policy update in the 2016 Comp Plan (added after release of the Public Review Draft) to provide amenities to unincorporated urban area receiving communities at levels commensurate with the number of TDRs used in the community. The Work Plan proposes a pilot study in the East Renton Plateau area to identify and provide amenities for that particular TDR receiving area.
18. Unscrupulous owner/developers are now using TDRs as a punishment list item with community residents.	TDR program staff are unaware of this issue. To address this, TDR program staff would need specific examples and contact information for the developers in question.
19. Cities don't have a need for density credits.	Cities may choose to include TDR as one type of bonus density incentive because regional conservation is of importance to city leaders and city residents.
20. City incentives to use TDRs in receiving sites impacts King County's general fund.	Predominantly, amenity funding to cities has been and will be from Conservation Futures funds and TDR bank funds. For the LCLIP agreement with Seattle (the only such agreement at this point), revenue from TDR sales for use in county-led conservation of forest and farmland will be roughly equal to (and possible greater than)the share of the property tax (i.e. general fund) provided to Seattle over the 25-yr period of the agreement.
21. King County is paying at least double what's being paid for private TDR development right purchases.	King County is required to base the prices paid to rural landowners on appraisals of fair market value. In the private TDR model (i.e. <i>not</i> the TDR Bank)Rural landowners wishing to protect their land do not receive money upfront, but are issued TDRs they can later voluntarily sell to developers seeking TDRs. King County cannot control the sale price of private TDRs since those are transacted in voluntary private-to-private transactions.
22. TDRs are the only density credits that do not provide a local benefit.	The conservation resulting from TDRs has a benefit that accrues to all residents of the region. The "value" of conservation of open space and resource lands is becoming increasingly clear (e.g. in scientific literature). While TDRs protect land that is usually far afield from receiving sites, the regional benefits of conservation are real and lasting. Also, TDR agreements can result in local benefits through provision of amenities to receiving area communities.

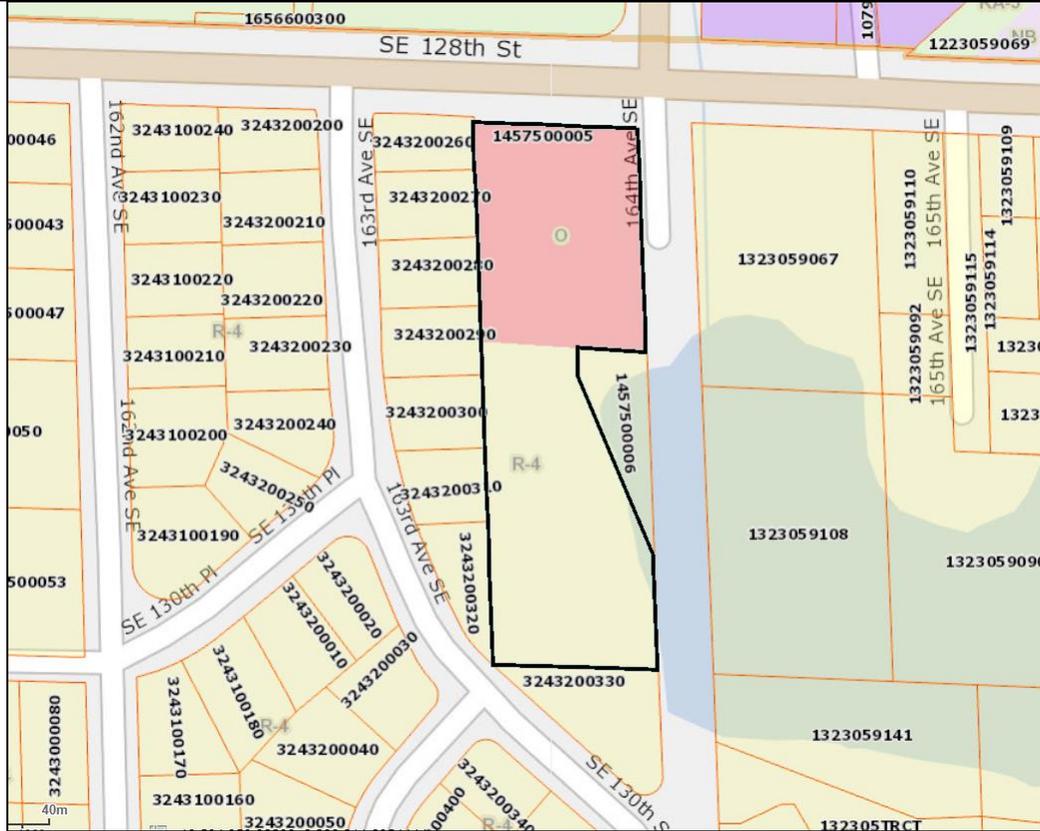
TOM CARPENTER – TRANSFER OF DEVELOPMENT RIGHTS PROGRAM COMMENTS		
COMMENT		RESPONSES
23. The overall TDR program has insufficient data transparency necessary to perform a meaningful analysis of results.	King County’s TDR Program website has extensive data on sending and receiving site locations, TDR market transactions and pricing, agreements with cities and other general information about the program: www.kingcounty.gov/tdr	
24. The price being paid some rural land owners may be unrealistically low.	All TDR transactions are voluntary, including the purchase of TDRs from rural landowners at values determined through appraisals of fair market value; if TDR purchase prices are too low for rural landowners to accept, they can choose not to complete a transaction.	

TOM CARPENTER – ZONING ON PARCEL 1457500005		
COMMENT		RESPONSES
<p><i>From: Tom [mailto:TDCarp@comcast.net]</i> <i>Sent: Wed., January 13, 2016 12:00 PM (NOTE: This is a resend of multiple emails transmitted prior to January 6, 2016)</i></p> <p>I challenge the RB (Regional Business) zoning on parcel 1457500005.¹ There are only [a few]Regional Business zoned parcels in the county and the parcel doesn’t comply with the conditions for a Regional Business zone. [Additionally], 1) it appears inappropriate to put an RB on the urban/rural fringe, and 2) given how few parcels are zoned RB, what’s the definition and should the zone stay in existence?</p> <p>Require an area zoning study of all RB zoned parcels with the view to determine if RB is an appropriate land use designation. If none of the parcels with RB land use in the county are not appropriate for the vision of RB land use, the RB land use should be removed from the land use list.</p>		<p>The zoning change for this property was approved as part of the 2012 Comprehensive Plan update (Ordinance 17485, enacted December 13, 2012). The time period for appeal to this decision has passed and it is too late to challenge the zoning change. The CARE group (Citizen’s Alliance to Reach Out & Engage) submitted an extensive challenge to the Growth Management Hearings Board, but the rezone was upheld. There are no additional avenues to appeal available.</p>

TOM CARPENTER – ZONING ON PARCEL 1457500005

COMMENT

RESPONSES



¹ KC GIS does not have the property on the plateau zoned RB. I have an email into a contact to find out why. It's shown as O(Office). A 2012 rezone made part of the parcel Office and Regional Business and the remainder R-4 (Residential Four).

Zoning	Residential 4 and Office (Current), Regional Business (Potential)
Land Use	co (Commercial Outside a Center) and um (Urban Medium)

TOM CARPENTER – ZONING ON PARCEL 1457500005	
COMMENT	RESPONSES
<p>Without additional comment, I'm worried that the Exec transmittal will not include that recommendation.</p> <p>The implementation of GMA created the initial land use and zoning designations for the county. The Parcel was designated Office with the potential for Regional Business.</p> <p>“Potential” land use designations usually came with an area zoning study requirement, which was the case for the Parcel.</p> <p>Three rezone attempts have been made for the Parcel. The first two were administrative (submitted to DDES/DPER); the third was legislative.</p> <p>The first rezone was denied by DDES/DPER. The second went to the Hearing Examiner who ruled against the application mainly on the grounds that the requirements for an Regional Business designation were not satisfied by the property. The Council unanimously agreed with the Hearing Examiner ruling.</p> <p>In 2012 the property owners requested a legislative rezone, which was approved in spite of the conditions ruled on by the Hearing Examiner were still appropriate. In order to avoid that decision from happening again, the Council had to change Comprehensive Plan policy to remove the requirement for the area zoning study in the case of the Parcel. Had the Area Zoning Study been done, it is highly probable that the rezone would not have been approved.</p> <p>The net is that a completely inappropriate land use designation exists on the Parcel, which lies inside a Renton Potential Annexation Area. The letter sent by Renton during the consideration of the rezone requesting the rezone be denied, was ignored.</p> <p>If the Exec puts the reversal of the rezone into the transmittal, we'll have a much better chance of being able to influence the Council to reverse the 2012 rezone decision.</p> <p>Although legal, an RB zone is completely inappropriate for the Parcel.</p>	

REBECCA CHANEY — MULTIPLE TOPICS	
COMMENT	RESPONSES
<p><i>From: Becky Chaney [mailto:becky@chaney.org]</i> <i>Sent: Wednesday, January 06, 2016 5:03 PM</i></p> <p>Thank you for the opportunity to comment on proposed updates to the 2016 King County Comprehensive Plan. I comment as an interested rural King County resident actively serving as a King County representative to the Snoqualmie Watershed Forum. I am a certified NRCS Trained Service Provider and have written accepted forest stewardship plans for Snoqualmie Valley farms and residents. I also take an active interest in our state’s native plants and serve as the conservation chair for the Washington Native Plant Society. I appreciate the effort and thought taken by King County staff in this ongoing effort to keep the comprehensive plan consistent with current science and practice. My specific comments will be limited to sections of my highest interest and knowledge: Chapter 3 Rural Areas and Natural Resource Lands, Chapter 5 Environment.</p> <p>Overall, I find that this four-year update primarily consists of small wording changes that clarify or better match existing practices and current science. It also incorporates changes recognizing the need to address climate change and carbon sequestration along with equity and social justice in ways that support or do not profoundly impact rural and natural resource areas.</p> <p>Chapter 4.</p> <ul style="list-style-type: none"> • This chapter omits critical information on endangered, threatened and sensitive species, identified at the state level, which the plan rightfully recognizes as required by the GMA. Washington Department of Fish and Wildlife only recognizes certain animals and no plants or other at risk species. The comprehensive statewide list (and King County sub-list) is available through the Washington Department of Natural Resources Natural Heritage program. It needs to be either specifically included or referenced. I am sending a copy of the list for King County along with this letter. • Otherwise and overall the proposed changes to this chapter are all positive. <p>Chapter 3.</p> <ul style="list-style-type: none"> • The section on Equity and Social Justice is very limited and should be more carefully considered 	<p>Comments noted and appreciated.</p> <p>There are a number of minor wording changes, however, these are intended to make the document more user-friendly, along with the new table of contents, executive summary and other minor but useful changes.</p> <p>King County DNRP will continue to work on Climate Change, and evaluate soil amendments as a means to increase carbon storage.</p> <p>Chapter 4 Washington GMA requires that each jurisdiction designate fish and wildlife habitat conservation areas. King County's are described in Section 4 and listed in policy E-432. Further, all species the County has designated as species of local importance are listed in policy E-435.</p> <p>Chapter 3 We appreciate the comment on how stormwater is treated in the Rural Chapter. The County balances the requirements of our National Pollutant</p>

REBECCA CHANEY – MULTIPLE TOPICS	
COMMENT	RESPONSES
<p>in future updates. It may match regional statistics, but does not recognize the very real need of some of low-income or aging rural community members.</p> <ul style="list-style-type: none"> • Addressing stormwater and impervious surface concerns throughout this chapter is appropriate to the needs of the rural community. • The emphasis on soil amendments to increase carbon storage is of interest and possible concern. This is a very specific directive and consideration of impacts to soil structure and biota should be closely monitored. • I find the intent of R-319a, regarding removal of urban unincorporated areas as eligible TDR receiving sites confusing. I would think that rather than “remove” it should read “retain” but this is not my area of expertise and I may be misunderstanding the intent. R-320a, in contrast, makes complete sense. <p>Rebecca Chaney, Resident of Rural King County</p>	<p>Discharge Elimination System permit with the challenges of farmers and foresters in meeting requirements that are geared toward highly developed/impervious areas.</p> <p>The intent of Policy R-319a is to make clear under what circumstances the County should remove urban unincorporated areas as eligible TDR receiving sites for subdivisions of projects that create 10 or more new lots. This policy has been updated in the Executive Recommended Plan.</p>

PAT COLLIER – SHORELINES	
COMMENT	RESPONSES
<p><i>From: Pat Collier [mailto:pcollier000@centurytel.net]</i> <i>Sent: Tuesday, January 05, 2016 1:18 PM</i></p> <p>It is regrettable that the 2 month public comment period for the draft Comprehensive Plan occurred November- January 6. The December enewsletter shows it was obvious that the County was aware it was the holiday season. It was difficult to adequately review even the one chapter I have the most concerns about - Chapter 6, Shorelines.</p> <p>Human modifications of the nearshore and marine riparian habitat are a major cause of the decline in the health of the Puget Sound ecosystem. Scientists say this wonderfully rich, diverse, intricate web of life is</p>	<p>King County was aware that the public comment period occurred during the holidays, which is why it provided an extended comment period of 2-months, which is significantly longer than what is required in state law. Also, please see Section I of this report that provides and overview of the public engagement on the update as a</p>

PAT COLLIER — SHORELINES	
COMMENT	RESPONSES
<p>on the brink of, or is already experiencing, an ecosystem wide collapse. Several levels of the food chain are affected. The most obvious signs of loss include:</p> <ul style="list-style-type: none"> • listed as threatened under the Endangered Species Act the Puget Sound chinook, bull trout, and the system’s top predator, the orca whale; • decline of numerous other species that live in Puget Sound, including Pacific herring, rockfish, coho salmon, scoters, Western grebes and great blue herons. <p>As of 2013 there were 119 species at risk in the Salish Sea, almost twice the number of species that were at risk in 2002. Clearly the incremental damage to our shorelines must be stopped and degraded habitats restored. Riparian habitats play a critical role in maintaining healthy populations of marine life. If we do not want a dead sea, such as Chesapeake Bay and portions of the Gulf of Mexico, we must protect and restore what little marine riparian function there is left on the shores of Puget Sound.</p> <p>Although the Comprehensive Plan acknowledges that "[e]ver increasing pressures of additional use are being placed on the shoreline jurisdiction," I did not see substantial changes in the draft that would reduce or reverse the continued incremental damage to Puget Sound shorelines. I did not see changes that make this “updated” Plan more consistent with the best available science. Cosmetic changes that would improve readability:</p> <ul style="list-style-type: none"> • after spelling out at first mention in a section use acronyms, as was done on page 6-3, C. 1. Use of SMP and SMA should be consistent; • the flow chart on page 6-30 might be easier for some of us old folks who no longer have the eyesight we once had if it were turned 90 degrees and enlarged, with a legend to explain acronyms. <p>Please do all you can to protect Puget Sound riparian habitat from further damage and to restore as much as possible. Please make the Plan as beneficial to the health of Puget Sound as is possible. Thank you for giving these comments careful consideration.</p>	<p>whole.</p> <p>Protecting and restoring the Puget Sound Nearshore is a very high priority in both the Puget Sound Action Agenda and in the Salmon Recovery Plans for the Green/Duwamish & Central Puget Sound Watershed (WRIA 9) and the Lake Washington/Cedar/Sammamish Watershed (WRIA 8) which cover all of King County’s nearshore. These Plans, which the King County Comprehensive Plan strongly supports, include actions to protect existing high quality shoreline habitat and to restore nearshore habitat by removing existing shoreline armoring and restoring shoreline function where possible. These plans also include outreach and incentive programs to encourage property owners to not harden their shorelines and to use softer more habitat friendly methods of erosion prevention if necessary. There are also recommendations related to strengthening regulations and stronger enforcement of existing regulations related to shoreline armoring. One of the Puget Sound Partnership’s vital signs to measure our effectiveness in restoring Puget</p>

PAT COLLIER — SHORELINES	
COMMENT	RESPONSES
	Sound is amount of shoreline armoring.

D

KATE DELAVAN (AMERICAN FARMLAND TRUST) — TRANSFER OF DEVELOPMENT RIGHTS, FARMLAND	
COMMENT	RESPONSES
<p><i>From: Kate Delavan [mailto:kdelavan@farmland.org]</i></p> <p><i>Sent: Wednesday, December 30, 2015 4:41 PM</i></p>	

KATE DELAVAN (AMERICAN FARMLAND TRUST) — TRANSFER OF DEVELOPMENT RIGHTS, FARMLAND

COMMENT

RESPONSES



December 30th, 2015

Mr. Ivan Miller
Comprehensive Planning Manager
King County Office of Performance, Strategy and Budget
401 5th Ave. Suite 810
Seattle, WA 98104

Dear Mr. Miller,

Thank you for the opportunity to comment on the 2016 Public Review Draft of the Comprehensive Plan. The mission of American Farmland Trust is to protect farmland, promote sound farming practices, and keep farmers on the land. We are a national non-profit organization with a regional office located in Seattle. Our diverse membership includes residents of King County. In general, we are pleased to see that the Draft Comprehensive Plan includes several additions to support the viability of farming in King County. Our comments on specific policies are as follows:

Rural Areas and Natural Resource Lands, III Rural Densities and Development, C. Transfer of Development Rights Program

R-314 King County supports and shall work actively to facilitate the transfer of Rural Area and Natural Resource Lands development rights to:

f. "Provide mitigation for the impacts of urban development on global climate change by simultaneously reducing transportation-related greenhouse gas emissions and sequestering carbon through retention of forest cover and conserving agricultural lands through zoning, land use planning, transfer of development rights and similar tools."

We support the inclusion of agricultural lands in this policy statement. A recent American Farmland Trust study conducted in California found that urban areas emit 58 times more greenhouse gasses per acre than the state's farmland.¹ Protecting agricultural lands from development is an important climate change mitigation strategy.

Rural Areas and Natural Resource Lands, VI Resource Lands, D. Agriculture

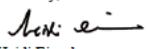
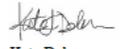
R-642a King County should develop a long term strategy for financing protection of sufficient farmland to significantly expand and retain food production, including improving the farmability of protected farmland, and ensuring that the easements are well-managed for the long-term.

¹ Shaffer and Thompson, "A New Comparison of Greenhouse Gas Emissions from California Agricultural and Urban Land Uses" May 2015, American Farmland Trust, Retrieved from: <http://www.farmlandinfo.org/new-comparison-greenhouse-gas-emissions-california-agricultural-and-urban-land-uses> on 12/29/2015

Comments noted and appreciated.

The County Executive and staff at the Department of Natural Resources and Parks view AFT as a valued member of the "Kitchen Cabinet" and a partner in the County's farmland preservation efforts.

Policies R-314, R-642A, and R-661A were added to the comprehensive plan to reflect the recommendations of the Kitchen Cabinet.

KATE DELAVAN (AMERICAN FARMLAND TRUST) — TRANSFER OF DEVELOPMENT RIGHTS, FARMLAND		
COMMENT	RESPONSES	
<p><u><i>R-661a To help make more farmland accessible to beginning and low-income farmers, King County should expand its leasing of agricultural land to farmers where appropriate and should encourage private farmland owners to lease unused land to farmers.</i></u></p> <p>As a member of Executive Constantine’s 2014 Kitchen Cabinet, we are heartened to see the incorporation of many of the group’s recommendations. We support the County’s goal of adding 400 net new acres in food production and 25 new food farmers per year over the next ten years. Given trends in regional growth, development pressure on farmland in King County is only going to increase and may make meeting these goals even more difficult in the future. R-642a and R-661a recognize that meeting these targets will require innovative thinking as well as new resources. We support these additional policies.</p> <p>2015 Docket Report, King County Comprehensive Plan, December 2015</p> <p><u>We agree with the Executive’s Recommendation to not support Docket Item #13.</u> This request proposes to amend the Urban Growth Area to include land currently in the Sammamish Agricultural Production District (APD) to allow for annexation by the City of Woodinville. We do not believe de-designating this parcel is appropriate under the de-designation eligibility criteria included in R-656 in the Comprehensive Plan. This land is currently being leased to farmers and removing it would diminish agricultural production in the Sammamish APD. Annexing and developing this property runs contrary the County’s goal to increase land in agricultural production.</p> <p>Thank you for the opportunity to comment on the 2016 Draft Comprehensive Plan. If you have any questions, please do not hesitate to reach out to us by email kdelavan@farmland.org or telephone 206-860-4222.</p> <p>Sincerely,</p> <div style="display: flex; justify-content: space-between;"> <div style="text-align: center;">  Heidi Eisenhour Regional Director </div> <div style="text-align: center;">  Kate Delavan Policy and Planning Manager </div> </div> <p style="font-size: small; text-align: center;">1402 3rd Avenue • Suite 1325 • Seattle, Washington 98101 • 206-860-4222 • www.farmland.org</p>	<p>Comments noted. These are consistent with the recommendation in the Area Zoning Study.</p>	

E

DIANE EMERSON – WATER QUALITY AND EFFICIENCY	
COMMENT	RESPONSES
<p><i>Vashon-Maury Island Community Meeting Comment Card</i></p> <p>Septic Systems and Water Efficiency</p> <ul style="list-style-type: none"> • CP 1241 – Add water conservation to the list of topics covered in the education program. Water conservation is generally cheaper than rainwater, greywater, reclaimed water or desalinization. • CP 1243 – Instead of the word "encourage," use "fully embrace and support". Also, Why? The use of these new and alternative on-site septic treatment technologies are currently being actively discouraged in the Bellevue office of Seattle/King County Public Health. <p>An area not covered anywhere yet:</p> <ul style="list-style-type: none"> • When people increase their water efficiency, they should be given credit for this when calculations are made for the required size of their septic system. • CP 1239 – 1234: The Vashon water utilities should be encourage to treat water conservation as a full-scale legitimate water supply option. Conservation is cheaper and more reliable than developing <u>new</u> water sources. The last failed well which was dug by District 19 was a good example. 	<p>Yes, water conservation is generally less expensive than alternative methods of capturing water. Because it seems obvious, this topic may be addressed by educational programs without adding it to the list of covered topics.</p> <p>New and alternative on-site septic treatment technologies need to meet Public Health standards before they can be promoted.</p>

F

FUTUREWISE – MULTIPLE TOPICS	
COMMENT	RESPONSES
<i>From: Tim Trohimovich [mailto:Tim@futurewise.org]</i> <i>Sent: Thursday, January 07, 2016 1:57 PM</i>	

FUTUREWISE — MULTIPLE TOPICS		
COMMENT	RESPONSES	
 <p>January 6, 2016</p> <p>Mr. Ivan Miller, AICP, Comprehensive Planning Manager Ms. Karen Wolf, AICP, Senior Policy Analyst King County Office of Performance, Strategy and Budget 401 5th Avenue, Suite 800 Seattle, Washington 98104</p> <p>Subject: Comments on the Public Review Draft of the 2016 Comprehensive Plan Sent via email to: compplan@kingcounty.gov and hand delivered</p> <p>Dear Mr. Miller and Ms. Wolf:</p> <p>Thank you for the opportunity to comment on the <i>Public Review Draft of the 2016 Comprehensive Plan</i>. As the draft documents, King County has a long history of excellence and innovation in comprehensive planning. Our review of the Public Review Draft of the 2016 Comprehensive Plan shows that this version continues this long history, and we strongly support the update. While there are too many good features for us to single them all out, this letter does identify some of the features we strongly support. We also briefly comment on several of the area zoning studies and include recommendations to strengthen the 2016 comprehensive plan update.</p> <p>Futurewise is working throughout Washington State to create livable communities, protect our working farmlands, forests, and waterways, and ensure a better quality of life for present and future generations. We work with communities to implement effective land use planning and policies that prevent waste and stop sprawl, provide efficient transportation choices, create affordable housing and strong local businesses, and ensure healthy natural systems. We are creating a better quality of life in Washington State together. We have members across Washington State including King County.</p> <p>2016 Comprehensive Plan Provisions We Strongly Support</p> <ul style="list-style-type: none"> ■ The comprehensive plan's analysis and policies addressing health disparities, equity, and social and environmental justice, such as Policies U-201a, ED-303a, and ED-303b. See pages 1-18 to 1-22 and page 2-36 of the Public Review Draft. We are particularly impressed by RP-121 and the County's commitment to the assessment and review of disparities in the development, implementation and funding of projects and programs. Addressing these important topics is important to addressing the needs of the entire community. We strongly support them. <p>816 Second Avenue, Suite 200 Seattle, WA 98104 www.futurewise.org phone 206 343 0681</p>	<p>Comments noted; we appreciate the recognition of changes in the Comprehensive Plan that the organization strongly supports.</p>	

FUTUREWISE — MULTIPLE TOPICS		
COMMENT	RESPONSES	
<p>Comments on the Public Review Draft of the 2016 Comprehensive Plan January 6, 2016 Page 2</p> <ul style="list-style-type: none"> ■ Policies directing urban or largely urban-serving facilities away from rural areas and resource lands. This keeps rural areas rural and will make urban-serving facilities more convenient and accessible for the residents of cities, towns, and the unincorporated urban area. It will also reduce greenhouse gas pollution and transportation costs. ■ Policies that support the annexation of unincorporated urban areas, see Policies U-201 to U-208. This is particularly important in unincorporated urban areas with significant health, social and economic disparities which could be improved with the facilities or services which not possible in unincorporated areas. ■ Proposed Policy R-642a which calls on King County to develop a long term strategy for financing protection of sufficient farmland to significantly expand and retain food production. We agree that the continuation of the county's ground breaking agricultural purchase of development rights program is an effective way of preventing farmland from being paved over. ■ Proposed Policy R-661a which encourages making more farmland accessible to beginning and low-income farmers and proposed Policy R-661b which calls on King County to expand representation of low income and socially disadvantaged farmers within King County agricultural processes. This will both help conserve working farms and enhancing social equity. ■ Proposed Policy R-668a which calls on the county to continue to support drainage improvements through its Agricultural Drainage Assistance Program. We agree this is a valuable program that has both benefited agriculture and fish and wildlife habitat. We also agree that drainage will become even more important as sea levels rise and storms increase in ferocity due to global warming. ■ Proposed Policies H-204 through H-208 which include many provisions to create thriving and healthy communities and increase involvement by those who currently have suboptimal health outcomes. These policies will improve social equity and the health of King County residents. ■ We strongly support the proposed narrative and policies addressing greenhouse gas pollution and global warming. These policies include updated Policies E-206, E-210, and E-224 and proposed Policies E-206a through E-206c, E-215a and E-215e, E-221a and b, and E-226a. We agree that this is the most serious environmental problem currently facing King County and its residents. ■ Proposed Policies E-499q1, E-499q2, and modified Policy E-499r. These policies will help protect people and property from flood damage. 	<p>Thank you.</p>	

FUTUREWISE — MULTIPLE TOPICS

COMMENT

RESPONSES

Comments on the Public Review Draft of the 2016 Comprehensive Plan
January 6, 2016
Page 3

- We strongly support the new "Planning for Disasters" narrative and proposed Policy E-499u. Planning in advance for the inevitable disasters that occur in King County will help protect people and property, speed recovery, and help protect the county and state economy.
- Proposed Policies E-507a, E-507b, and E-508a. These policies incorporate some of the lessons of the Oso disaster. However, we do recommend improvements to the proposed revisions to Policy E-508.
- We strongly support modified Policy F-228 which will increase protection for working farms.

Comments on the Area Zoning Study Recommendations

We strongly support not including Area Zoning Study No. 6, the Snoqualmie Interchange, in the Urban Growth Area

We strongly support the recommendation not to expand the urban growth area to include Area Zoning Study No. 6, the Snoqualmie Interchange. We agree that the urban growth area expansion (UGA) violates the Growth Management Act and the King County Comprehensive Plan. The Washington State Supreme Court has held that an "UGA designation cannot exceed the amount of land necessary to accommodate the urban growth projected by the Washington State Office of Financial Management (OFM), plus a reasonable land market supply factor."¹ Accord to *The King County Buildable Lands Report 2014*, the City of Snoqualmie has a 2012-2031 employment target of 313 jobs and a capacity of 1,993 jobs.² Since the City has a surplus capacity of 1,680 jobs,³ the proposed UGA expansion violates the Growth Management Act. It also violates several *King County Comprehensive Plan* policies, such as current policy U-202, proposed to be RP-106, which prohibits urban growth area expansions except through the 4 to 1 program. Since the 4 to 1 program only allows residential expansions, this proposal also violates the King County Comprehensive Plan.

In addition, we are concerned about the greenhouse gas pollution that will result from the commercial uses contemplated for this expansion. If this expansion is given further

¹ *Thurston County v. Western Washington Growth Management Hearings Bd.*, 164 Wn.2d 329, 351 – 52, 190 P.3d 38, 48 – 49 (2008) (emphasis added).

² *The King County Buildable Lands Report 2014* p. 126 (Approved by King County Growth Management Planning Council July 23, 2014) accessed on Dec. 29, 2015 at:

http://www.kingcounty.gov/~media/property/permits/documents/GrowthManagement/FINAL_King_County_Buildable_Lands_Report_2014_0721.aspx?amen

³ *Id.*

Thank you.

Comments noted. These are consistent with the recommendation in the Area Zoning Study.

FUTUREWISE — MULTIPLE TOPICS		
COMMENT		RESPONSES
<p>Comments on the Public Review Draft of the 2016 Comprehensive Plan January 6, 2016 Page 4</p> <p>consideration, its greenhouse gas pollution should be modeled to see if it is consistent with the county's greenhouse gas reduction requirements.</p> <p>We support <u>not</u> including Area Zoning Study No. 7, the Duthie Hill Notch, in the Urban Growth Area</p> <p>We strongly support the recommendation not to expand the UGA to include Area Zoning Study No. 7, the Duthie Hill Notch. We agree that the UGA expansion violates the Growth Management Act and the King County Comprehensive Plan. The Washington State Supreme Court has held that an "UGA designation <i>cannot exceed</i> the amount of land necessary to accommodate the urban growth projected by the Washington State Office of Financial Management (OFM), plus a reasonable land market supply factor."⁴ Accord to <i>The King County Buildable Lands Report 2014</i>, the City of Sammamish has a 2012-2031 housing target of 3,379 housing units and a capacity of 5,466 housing units.⁵ Since the City has a surplus capacity of 2,087 housing units,⁶ the proposed UGA expansion violates the Growth Management Act. We do not believe that using a 4 to 1 proposal to expand the UGA can override this GMA requirement.</p> <p>We support the recommendation not to expand the Fall City Business District until planning for a solution to the waste water problem in the area is further defined</p> <p>We support the recommendation not to expand the Fall City Business District, Area Zoning Study No. 8, but instead conduct further analysis of solutions to the waste water issues for this area before considering any expansions.</p> <p>We strongly support <u>not</u> including Area Zoning Study No. 12, the Carnation Urban Growth Area Boundary Expansion, in the Urban Growth Area</p> <p>We strongly support the recommendation not to expand the UGA to include Area Zoning Study No. 12, the Carnation Urban Growth Area Boundary Expansion. We agree that the UGA expansion violates the Growth Management Act and the King County Comprehensive Plan. The Washington State Supreme Court has held that an "UGA designation <i>cannot exceed</i> the amount of land necessary to accommodate the urban growth projected by the Washington State Office of Financial Management (OFM), plus a reasonable land market supply factor."⁷ Accord to <i>The King County Buildable Lands Report</i></p> <p>⁴ <i>Thurston County v. Western Washington Growth Management Hearings Bd.</i>, 164 Wa.2d 329, 351 – 52, 190 P.3d 38, 48 – 49 (2008) (emphasis added). ⁵ <i>The King County Buildable Lands Report 2014</i> p. 99 (Approved by King County Growth Management Planning Council July 23, 2014). ⁶ <i>Id.</i> ⁷ <i>Thurston County v. Western Washington Growth Management Hearings Bd.</i>, 164 Wa.2d 329, 351 – 52, 190 P.3d 38, 48 – 49 (2008) (emphasis added).</p>		<p>Comments noted. These are consistent with the recommendation in the Area Zoning Study.</p> <p>Comments noted. These are consistent with the recommendation in the Area Zoning Study.</p> <p>Comments noted. These are consistent with the recommendation in the Area Zoning Study. This area is eligible to come forward as a Four to One application.</p>

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<p>Comments on the Public Review Draft of the 2016 Comprehensive Plan January 6, 2016 Page 5</p> <p>2014, the City of Carnation has a 2012-2031 housing target of 330 housing units and a capacity of 800 housing units.⁸ So the City has a surplus capacity of 470 housing units.⁹ Further, the City of Carnation has a 2012-2031 employment target of 531 jobs and a capacity of 1,731 jobs.¹⁰ So the City has a surplus capacity of 1,200 jobs.¹¹ Since the City has substantial housing and job surpluses, any urban growth area expansion violates the Growth Management Act.</p> <p>Further, we are concerned about an UGA expansion adjacent to the Agricultural Production District. Urban development and agriculture are not compatible.¹² If there is a public benefit to an UGA expansion, which we do not believe has been documented, it would be preferable to expand the UGA onto rural land that does not abut the Agricultural Production District.</p> <p>In addition, we are concerned about the greenhouse gas pollution that will result from the urban uses contemplated for this expansion. If this expansion is given further consideration, its greenhouse gas pollution should be modeled to see if it is consistent with the county's greenhouse gas reduction requirements including the loss of carbon sequestration that would result from the conversion of the farmland.</p> <p>We strongly support <u>not</u> including Area Zoning Study No. 13, the North Bend Urban Growth Boundary Expansion, in the Urban Growth Area</p> <p>We strongly support the recommendation not to expand the UGA to include Area Zoning Study No. 13, the North Bend Urban Growth Boundary Expansion. We agree that the UGA expansion violates the Growth Management Act and the King County Comprehensive Plan. The Washington State Supreme Court has held that an "UGA designation <i>cannot exceed</i> the amount of land necessary to accommodate the urban growth projected by the Washington State Office of Financial Management (OFM), plus a reasonable land market supply factor."¹³ Accord to <i>The King County Buildable Lands Report 2014</i>, the City of North Bend has a 2012-2031 housing target of 648 housing units and a capacity of 1,583</p> <p>⁸ <i>The King County Buildable Lands Report 2014</i> p. 112 (Approved by King County Growth Management Planning Council July 23, 2014). ⁹ <i>Id.</i> ¹⁰ <i>Id.</i> ¹¹ <i>Id.</i> ¹² Arthur C. Nelson, <i>Preserving Prime Farmland in the Face of Urbanization: Lessons from Oregon</i> 58 JOURNAL OF THE AMERICAN PLANNING ASSOCIATION 467 pp. 468 – 69 (1992) enclosed with the paper original of this letter. The Journal of the American Planning Association is a peer-reviewed journal, see the Instructions for Authors p. 4 of 9, enclosed with the paper original of this letter and accessed on Dec. 29, 2015 at: http://www.tandfonline.com/action/authorSubmission?journalCode=tjpa20&page=instructions#VofMfAElH13 ¹³ <i>Thurston County v. Western Washington Growth Management Hearings Bd.</i>, 164 Wn.2d 329, 351 – 52, 190 P.3d 38, 48 – 49 (2008) (emphasis added).</p>		<p>Comments noted. These are consistent with the recommendation in the Area Zoning Study. This area is eligible to come forward as a Four to One application.</p>

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<p>Comments on the Public Review Draft of the 2016 Comprehensive Plan January 6, 2016 Page 6</p> <p>housing units.¹⁴ So the City has a surplus capacity of 935 housing units.¹⁵ Further, the City of North Bend has a 2012-2031 employment target of 609 jobs and a capacity of 7,319 jobs.¹⁶ So the City has a surplus capacity of 6,710 jobs.¹⁷ Since the City has very substantial housing and job surpluses, any urban growth area expansion violates the Growth Management Act.</p> <p>Further, the area proposed for the UGA expansion has very significant natural hazards, such as being located in a floodway.¹⁸ Expanding the urban growth area in such hazardous and environmental sensitive area is a poor idea.</p> <p>In addition, we are concerned about the greenhouse gas pollution that will result from the urban uses contemplated for this expansion. If this expansion is given further consideration, its greenhouse gas pollution should be modeled to see if it is consistent with the county's greenhouse gas reduction requirements.</p> <p>We support <u>not</u> changing the zoning or development conditions applicable to Area Zoning Study No. 15, the Maple Valley Industrial Area, at this time</p> <p>We support the recommendation not to change the zoning of Area Zoning Study No. 15, the Maple Valley Industrial Area at this time. We agree that a more in depth study is needed to determine the best zoning for this land. Until that study is done, we also agree that the development conditions should not be modified or repealed.</p> <p>We strongly support the proposed Taylor Mountain Forest comprehensive plan amendments and rezones</p> <p>We strongly support rezoning eleven RA-10 parcels within King County Parks' Taylor Mountain Forest from RA-10 to F and include those parcels in the Forest Production District. We also support changing the land use category on parcels 3223079014, 3223079015 and 3223079009 to Open Space System. These changes are consistent with the current use of this land and its conservation easements.</p> <p>¹⁴ <i>The King County Buildable Lands Report 2014</i> p. 123 (Approved by King County Growth Management Planning Council July 25, 2014). ¹⁵ <i>Id.</i> ¹⁶ <i>Id.</i> ¹⁷ <i>Id.</i> ¹⁸ Zoning Study No. 13 North Bend Urban Growth Boundary Expansion p. 5.</p>		<p>Comments noted. These are consistent with the recommendation in the Area Zoning Study.</p> <p>Comments noted. These are consistent with the recommendation in the Area Zoning Study.</p>

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<p>Comments on the Public Review Draft of the 2016 Comprehensive Plan January 6, 2016 Page 7</p> <p>We strongly support the proposed Tall Chief Farm comprehensive plan amendments and rezones</p> <p>We support the recommendation to change the comprehensive plan designation of the Tall Chief Farm from rural to Agriculture and to add it to the Agriculture Production District. This is consistent with the proposed use of property for agricultural production. We agree parcel 052407-9002 qualifies to be zoned A-35 and the other two parcels should be zoned the A-10. The conservation of this land is another example of King County's excellent work conserving agricultural land.</p> <p>We support including SE 240th Street from the western city limits to 180th Avenue SE and 248th Avenue SE from the north city limits to SE 433rd Street in the urban growth areas</p> <p>These comprehensive plan amendments will allow the cities to annex these streets as they annex the adjacent urban growth areas. This is consistent with the Growth Management Act and the King County Comprehensive Plan.</p> <p>Suggestions to Improve the 2016 Comprehensive Plan Update</p> <p>Require more affordable and transit-supportive densities in the urban growth areas</p> <p>Density can help bring important benefits to a community. Higher densities are cheaper to serve with public facilities, saving taxpayers money.¹⁹ To provide transit supportive densities, at least seven homes per acre is necessary.²⁰ In most communities, to provide housing affordable for working families also requires higher housing densities. We are concerned that the densities in Policy U-123 are so low that public facilities and services will not be able to be efficiently provided and that much of the UGA will suffer from inefficient transit service or a lack transportation choices. So we recommend that Policy U-123 on page 2-12 be updated to call for a minimum density of seven dwelling units per acre outside areas with significant environmental limitations. Our additions are underlined and our deletions are struck through.</p> <p><small>¹⁹ Robert W. Burchell, Naveed A. Shad, David Listokin, Hilary Phillips, Anthony Downs, Samuel Seskin, Judy S. Davis, Terry Moore, David Helton, and Michelle Gail, <i>The Costs of Sprawl—Revisited</i> pp. 46–52 (Transit Cooperative Research Program Report 39, Transportation Research Board, National Research Council, 1998) accessed on Dec. 9, 2015 at: http://www.trb.org/Main/Blurbs/153808.aspx please see "Part B."</small></p> <p><small>²⁰ Boris Pushkarev & Jeffrey Zupan, <i>Public Transportation and Land Use Policy</i> p. 30 (Indiana University Press, Bloomington, Indiana, 1977) (public transit use is minimal below a net residential density of seven dwelling units an acre) cited page enclosed with the paper original of this letter.</small></p>		<p>Comments noted. These are consistent with the recommendation in the Area Zoning Study.</p> <p>Comments noted. These are consistent with the recommendation in the Area Zoning Study.</p>

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- U-123 King County should apply minimum density requirements to all urban residential zones of ~~four~~ seven 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 plan.

Clarify Policy R-309 on page 3-18

For many years, we have been concerned that rural King County cannot support densities of one dwelling unit per 2.5 acres. These densities, for example, can lead to ground water contamination. Marylynn Yates, in a peer reviewed scientific journal, analyzed ground water pollution from septic tanks. She concluded that septic tanks are major contributors of waste water, septic tanks are the most frequently reported cause of ground water contamination, and the most important factor influencing ground water contamination from septic tanks is the density of the systems.²¹ Lot sizes associated with ground water contamination cases ranged from less than a quarter acre to three acres.²² More recent studies support these conclusions. For example, an “observational study identified septic system density as a risk factor for sporadic cases of viral and bacterial diarrhea in central Wisconsin children.”²³ The greater the density of septic tanks the greater the likelihood of diarrheal disease.²⁴ And the highest septic tank densities studied were one septic tank per 11 acres.²⁵ Densities of one dwelling unit per 2.5 acres also have other adverse impacts. So we would prefer the elimination of that zone.

²¹ Marylynn V. Yates, *Septic Tank Density and Ground-Water Contamination* 23 GROUND WATER 586, p. 590 (1985) accessed most recently on Dec. 29, 2015 at: <http://info.ngwa.org/gwol/pdf/852537546.PDF> and enclosed with the paper original of this letter. Ground Water is a peer reviewed scientific journal. See the Ground Water Peer Review enclosed with the paper original of this letter.

²² Marylynn V. Yates, *Septic Tank Density and Ground-Water Contamination* 23 GROUND WATER 586, p. 590 (1985).

²³ Mark A. Borchardt, Po-Huang Chyou, Edna O. DeVries, and Edward A. Belongia, *Septic System Density and Infectious Diarrhea in a Defined Population of Children* 111 ENVIRONMENTAL HEALTH PERSPECTIVES 742, p. 745 (2003) accessed most recently on Dec. 29, 2015 at: <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC1241485/pdf/ehp0111-000742.pdf> and enclosed with the paper original of this letter. Environmental Health Perspectives is a peer reviewed scientific journal. See the Environmental Health Perspectives Journal Information accessed on Dec. 29, 2015 at: <http://ehp.niehs.nih.gov/journal-information> and enclosed with the paper original of this letter.

²⁴ Mark A. Borchardt, Po-Huang Chyou, Edna O. DeVries, and Edward A. Belongia, *Septic System Density and Infectious Diarrhea in a Defined Population of Children* 111 ENVIRONMENTAL HEALTH PERSPECTIVES 742, pp. 745 – 47 (2003).

²⁵ *Id.* at 747.

King County does not, at this time, support changing the minimum density requirements to seven or more homes per acre.

This is a minimum density for unincorporated areas; the County has the ability to negotiate higher densities with a city when an Interlocal Agreement (ILA) is developed to address annexation. Cities want the ability to determine where growth is located within their own boundaries and we respect that.

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Requiring the density to be achieved through density transfers from the Rural Forest Focus Areas was an improvement since the higher rural densities would be compensated somewhat by reduced densities in the Rural Forest Focus Areas. While we read the proposed amendment to R-309 as limiting the one dwelling unit per 2.5 acre density to the existing RA-2.5 zones, which would also be an improvement, it can also be read as allowing the one dwelling unit per 2.5 acre density in new RA-2.5 zones without the need to participate in the transfer of development rights program. So we recommend the following revisions to clarify that the one dwelling unit per 2.5 acres can only be achieved in currently existing RA-2.5 zones. Our additions are underlined and our deletions are struck through.

R-309 ~~The RA-2.5 zone has generally been applied to rural areas with an existing pattern of lots below five acres in size that were created prior to the adoption of the 1994 Comprehensive Plan. These smaller lots may still be developed individually or combined, provided that applicable standards for sewage disposal, environmental protection, water supply, roads and rural fire protection can be met. In the existing RA-2.5 zone, a subdivision at a density of one home per 2.5 acres shall only be permitted through the transfer of development rights from property in the designated Rural Forest Focus Areas in an area zoned RA-2.5 in 2015. The site receiving the density must be approved as a Transfer of Development Rights receiving site in accordance with the King County Code. Properties on Vashon-Maury Islands shall not be eligible as receiving sites.~~

We strongly support Policy R-668 on page 3-60 and its recommended improvements. We also recommend that it be enhanced to protect water availability for agriculture

We agree that the availability of water for irrigation, stock watering, and value added agricultural products is important to maintaining the agricultural industry.²⁶ One additional step that King County should take is to prohibit the transfer of water from agricultural operations to serve new developments. This is one of the greatest threats to maintaining water for agriculture. King County, through its development regulations, can prohibit these transfers to development in unincorporated King County and can work with other water providers to discourage them from acquiring agricultural water and converting it to other uses. So we recommend the following addition to Policy R-668 with our addition underlined.

R-668 ~~The county, King County shall work with federal, state, local, and private agencies to ensure and maintain adequate water for the needs of agriculture~~

²⁶ See for example, the Washington State Department of Agriculture, *Washington Agriculture Strategic Plan 2020 and Beyond* pp. 55 – 56 (2009) accessed on Dec. 29, 2015 at: <http://ser.wa.gov/fof>.

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Thank you for your comments on R-309. RA-2.5 zoning has a base density of .2 du per acre so the effective density is 1 du per 5 acres. The exception to this is to use TDRs to bring additional density in from Rural Forest Focus Areas up to a maximum of .4 du per acre; then the effective density is 1 du per 2.5 acres. (KCC 21A.12.030) The use of TDRs is allowed as one of two options on existing lots zoned RA-2.5 and any future lots zoned RA-2.5 when the owner wishes to build at an actual density of 1 du per 2.5 acres. (KCC 21A.12.030.B.1) These changes should not be made. The Executive Recommended Plan does revise this language as well as the preceding text.

We appreciate the intent of the change proposed by Futurewise, and King County supports a predictable water supply, particularly for Agricultural Enterprises. We agree with the first portion Futurewise’s proposed changes relating to water rights and agriculture lands. We have concerns that the second sentence can be implemented unless the County were to adopt legislation giving DPER the authority to deny development applications if water... *continued below*

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improve the availability and efficiency of water for agriculture by expanding the availability of recycled water to farms, offering incentives for irrigation efficiency, support mechanisms for water rights banking and trading that will give farmers greater certainty for water rights while protecting instream flows. King County shall not approve new developments that propose to transfer water from agriculture and the county shall work with cities, towns, and special districts to prevent such transfers. Assessments of future surface and groundwater availability for agriculture should consider projected impacts of climate change.

King County should designate mineral resource lands in advance of their need for mining

Skagit and Snohomish Counties have undertaken studies to identify the best available gravel deposits, designated them, and then protect them from incompatible uses. This will better protect an important economic resource and reduce land use conflicts. So we recommend that King County include a policy to undertake this work over the six or so years.

Retain and improve former Policy E-219 on page 5-30

While we support the new and improved climate change policies, we disagree with the recommendation to delete Policy E-219. This policy gives valuable guidance to the County's planning activities and should be retained.

In 2012 the National Research Council concluded that global sea level had risen by about seven inches in the 20th Century and would likely rise by 24 inches on the Washington coast by 2100 including Puget Sound.²⁷ The general extent of the two feet of sea level rise currently projected for coast can be seen on the NOAA Coastal Services Center Sea Level Rise Viewer available at: <http://coast.noaa.gov/digitalcoast/tools/slr/>

Ecology writes that "[s]ea level rise and storm surge[s] will increase the frequency and severity of flooding, erosion, and seawater intrusion—thus increasing risks to vulnerable communities, infrastructure, and coastal ecosystems."²⁸ Not only our marine shorelines

²⁷ National Research Council, *Sea-Level Rise for the Coasts of California, Oregon, and Washington: Past, Present, and Future* p. 23 & p. 128 (2012) accessed on Nov. 24, 2015 at: http://www.nap.edu/catalog.php?record_id=13389

²⁸ State of Washington Department of Ecology, *Preparing for a Changing Climate Washington State's Integrated Climate Response Strategy* p. 90 (Publication No. 12-01-004, April 2012) accessed on Feb. 17, 2015 at: http://www.ecy.wa.gov/climatechange/ipa_responsestrategy.htm

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were to be transferred from agriculture to other purposes. It is difficult to transfer irrigation water rights which are seasonal to year-round domestic uses. Most agriculture water rights are "lost" not because the water is transferred to supplying new houses, but are lost because the land is fallow and water right is not maintained under the "use or lose it" aspect of water law.

Further, County lacks both the authority to do as you requested. The approval of a change to a water right is exclusively done by the Washington State Department of Ecology.

King County has already done this kind of study to identify future sites. Large landowners were reluctant to identify possible future mining areas. In response, the County's Zoning Code allows mining uses in Forest Protection Districts (FPDs) and individual sites are reviewed when permit applications are submitted.

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<p>Comments on the Public Review Draft of the 2016 Comprehensive Plan January 6, 2016 Page 12</p> <p>Homes built today are likely to be in use in 2100, and new lots created today will almost certainly be in use in 2100. This is why the Washington State Department of Ecology recommends “[l]imiting new development in highly vulnerable areas.”³⁵ Therefore we recommend that new lots and new buildings be located outside the area of likely sea level rise. So we recommend that Policy E-219 include specific direction to update the County’s development regulations to direct development away from these hazardous areas. Our recommended addition is underlined below.</p> <p>E-219 <u>King County shall consider projected impacts of climate change, including more severe winter flooding and heat events, when updating disaster preparedness, levee investment, and land use plans; siting King County infrastructure; and updating development regulations. Update the County’s development regulations to direct development, including the creation of new lots, away from areas particularly sensitive to the effects of climate change such as sea level rise, areas into which wetlands will migrate, and flood plains.</u></p> <p>Update the water resources policies on pages 5-69 to 5-70 to comply with the requirements of the Growth Management Act, to protect senior water rights holders, instream flows, and water quality and quantity</p> <p>The Growth Management Act, in RCW 36.70A.070(1), requires in relevant part that “[t]he land use element shall provide for protection of the quality and quantity of groundwater used for public water supplies.” Further, the Growth Management Act, in RCW 36.70A.070(5)(c)(vi) also requires that “[t]he rural element shall include measures that apply to rural development and protect the rural character of the area, as established by the county, by: ... (iv) Protecting critical areas, as provided in RCW 36.70A.060, and surface water and groundwater resources...” In analyzing these requirements the Washington State Supreme Court wrote that</p> <p>¶ 58 In fact, several relevant statutes indicate that the County <i>must</i> regulate to some extent to assure that land use is not inconsistent with available water resources. The GMA directs that the rural and land use elements of a county’s plan include measures that protect groundwater resources. RCW 36.70A.070(1), (5)(c)(iv). Additional GMA *179 provisions, codified at RCW 19.27.097 and 58.17.110, require counties to assure adequate potable water is available when issuing building permits and</p> <p>Feb. 17, 2015 at: http://www.coastalwatershedinstitute.org/Final%20Report_Citallam%20County%20Bluffs%202014_Final%20Revised.pdf</p> <p>³⁵ State of Washington Department of Ecology, <i>Preparing for a Changing Climate Washington State’s Integrated Climate Response Strategy</i> p. 90 (Publication No. 12-01-004, April 2012). Accessed on Feb. 17, 2015 at: http://www.ecy.wa.gov/climatechange/ipa_responsestrategy.htm</p>		<p>King County appreciates Futurewise’s perspective on this difficult issue, and King County is working to address impacts and reduce emissions through the Strategic Climate Action Plan and Comprehensive Plan policies. This language is not included as the County does not allow development in the floodplain without meeting standards that accommodate sea level rise, climate change, etc. County policies allow development at base flood +3 feet, a very conservative number that significantly reduces potential risk.</p> <p>Comments noted.</p>

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approving subdivision applications. See *Swinomish Indian Tribal Cmty.*, 138 Wn. App. at 780, 158 P.3d 1179 (“We agree that the County is legally required to follow the dictates of [RCW 19.27.097].”).³⁶

Much of the water in King County “is already legally spoken for.”³⁷ Many of the sub-basins in the county are closed to new appropriations and even in those not formally closed to new, year-round appropriations are not available unless mitigated - the person seeking the water right mitigates the appropriation by acquiring a senior water right.³⁸

Unfortunately, King County’s comprehensive plan does not adequately address the lack of water resources in the County and the requirements of the Growth Management Act. As the above quotes document, the Growth Management Act uses the mandatory “shall.”³⁹ Many of King County’s policies related to surface and ground water use the much weaker “should.” Policies E-494, E-495, E-496, and E-497 all suffer from this defect. Policy E-495 is also inconsistent with the current municipal storm water permit which *requires* low impact development in many areas of the county, not *encouraging* it. These policies also lack effective measures, and where they have measures, they sometimes do not apply to all development. For example, Policy E-496 provides that “[i]n making future zoning and land use decisions that are subject to environmental review, King County shall evaluate and monitor groundwater policies, their implementation costs, and the impacts upon the quantity and quality of groundwater.” But why are SEPA-exempt developments, such as short subdivisions relying on permit-exempt wells, excluded and why focus on the impacts of policies rather than the impacts of the developments authorized by zoning and

³⁶ *Kittitas Cty. v. E. Washington Growth Mgmt. Hearings Bd.*, 172 Wn. 2d 144, 178 – 79, 256 P.3d 1193, 1209 (2011).

³⁷ State of Washington Department of Ecology Water Resources Program, *Focus on Water Availability Snohomish River Watershed, WRL4 7* p. 1 (Publication Number: 11-11-012, Revised August 2012) accessed on Dec. 31, 2015: <https://forress.wa.gov/ecy/publications/summarypages/1111012.html> and enclosed with the paper original of this letter; State of Washington Department of Ecology Water Resources Program, *Focus on Water Availability Cedar-Sammamish Watershed, WRL4 8* p. 1 (Publication Number: 11-11-013, Revised August 2012) accessed on Dec. 31, 2015:

<https://forress.wa.gov/ecy/publications/summarypages/1111013.html> and enclosed with the paper original of this letter; State of Washington Department of Ecology Water Resources Program, *Focus on Water Availability Duwamish-Green Watershed, WRL4 9* p. 1 (Publication Number: 11-11-014, Revised August 2012) accessed on Dec. 31, 2015: <https://forress.wa.gov/ecy/publications/summarypages/1111014.html> and enclosed with the paper original of this letter; State of Washington Department of Ecology Water Resources Program, *Focus on Water Availability Puyallup-White Watershed, WRL4 10* p. 1 (Publication Number: 11-11-015, Revised August 2012) accessed on Dec. 31, 2015:

<https://forress.wa.gov/ecy/publications/summarypages/1111015.html> and enclosed with the paper original of this letter; State of Washington Department of Ecology Water Resources Program, *Focus on Water Availability Kitsap Watershed, WRL4 15* p. 1 (Publication Number: 11-11-020, Revised August 2012) accessed on Dec. 31, 2015: <https://forress.wa.gov/ecy/publications/summarypages/1111020.html> and enclosed with the paper original of this letter.

³⁸ *Id.* at pp. 1 – 3.

³⁹ RCW 36.70A.070(1); (5)(c).

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Comments noted.

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<p>Comments on the Public Review Draft of the 2016 Comprehensive Plan January 6, 2016 Page 14</p> <p>land use decisions? The Growth Management Act requires that the measures apply to rural development,⁴⁰ not the County's policies.</p> <p>Requiring that new developments have the legal right to use their water source and an adequate and clean water supply is basic consumer protection. If you buy a lot or buy or rent a home you should be able to rely on it having a safe water supply that the occupants can use. Unfortunately, the proposed comprehensive plan fails to protect this basic human right. It is often historically disadvantaged populations that end up with the polluted drinking water supplies.</p> <p>To correct these problems and better protect surface and ground water quality, we recommend the following revisions to the comprehensive plan's ground water resources policies on pages 5-69 to 5-70. Our recommended additions are underlined and our recommended deletions are struck through.</p> <p>E-494 King County shall <u>should</u> protect the quality and quantity of groundwater countywide by:</p> <ul style="list-style-type: none"> a. Implementing adopted Groundwater Management Plans; b. Reviewing and implementing approved Wellhead Protection Programs in conjunction with cities, state agencies and groundwater purveyors; c. Developing, with affected jurisdictions, best management practices for development and for forestry, agriculture, and mining operations based on adopted Groundwater Management Plans and Wellhead Protection Programs. The goals of these practices should be to promote aquifer recharge quality and to strive for no net reduction of recharge to groundwater quantity; d. Refining regulations to protect Critical Aquifer Recharge Areas and well-head protection areas. <u>The Critical Aquifer Recharge Areas regulations shall require existing uses and new developments to implement best management practices and other actions to protect surface and ground water quality for all allowed uses;</u> e. Educating the public about Best Management Practices to protect groundwater; f. Encouraging forest retention and active forest stewardship; g. Incorporating into its land use and water service decisions consideration of potential impacts on groundwater quality and quantity, and the need for long-term aquifer protection; h. Coordinating groundwater management efforts with cities, water districts, groundwater committees, and state and federal agencies; i. Requiring the proper decommissioning of any well abandoned in the process of connecting an existing water system to a Group A water system; and <p>⁴⁰ RCW 36.70A.070(5)(c).</p>		<p>Thank you for your comments related to water resources and the requirements of the Growth Management Act with regard to the rural element. In general we agree with your thoughts albeit not to the extent portrayed in your letter. Ecology's in stream flow rules for King County watersheds or water resource inventory areas are not models of clarity. To what extent the basins are closed and what that means for ground water wells asserted for use under the groundwater permit exemption is open to debate. The County is well aware of the ongoing litigation in Whatcom County regarding the impact of that basin's in stream flow rule on planning under GMA and the pending Supreme Court decision.</p> <p>Further, comments on some sub-bullets:</p> <p>d. County regulations are already based on BMPs and there is no need to duplicate this; this addition should be removed</p>

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<p>Comments on the Public Review Draft of the 2016 Comprehensive Plan January 6, 2016 Page 15</p> <p>j. <u>Update the comprehensive plan and development regulations to match the allowed densities and uses with available water supplies; and</u> k. <u>When funding is available, monitoring groundwater status and trends, especially for the groundwater protection planning areas established by King County, and evaluating the groundwater monitoring results, along with groundwater monitoring performed by public water systems, plus their annual quantities of groundwater pumped over the five year period. Findings as an indicator of environmental quality should be reported for each groundwater management area.</u></p> <p>E-495 King County should protect groundwater recharge quantity by <u>requiring promoting</u> low impact development and other methods that infiltrate <u>stormwater</u> runoff where site conditions permit and where pollution source controls and stormwater treatment can prevent potential groundwater contamination.</p> <p>E-496 In making future <u>comprehensive plan, zoning, and land use decisions that are subject to environmental review</u>, King County shall evaluate and monitor groundwater <u>resource policies, their implementation costs, and the impacts upon the quantity and quality of groundwater. The depletion or degradation of aquifers needed for potable water supplies shall should</u> be avoided or mitigated, and the need to plan and develop feasible and equivalent replacement sources to compensate for the potential loss of water supplies should be considered.</p> <p>E-497 King County <u>shall should</u> protect groundwater in the Rural Area by: a. Preferring land uses that retain a high ratio of permeable to impermeable surface area, and that maintain and/or augment the natural soil's infiltration capacity and treatment capability for groundwater; and b. <u>Requiring risk assessments and monitoring, where appropriate, of rural potable water supplies in groundwater subareas, and coordinate findings with local and state governments, agencies, districts and local property owners to monitor potable water supplies at high-risk and develop plans to mitigate for the loss or serious impairment of domestic water supply from wells and springs; and</u> c. <u>Requiring standards for maximum vegetation clearing limits, impervious surface limits, and, where appropriate, infiltration of surface water.</u></p> <p>E-497a <u>Applicants for building permits, subdivisions, short subdivisions, and other divisions of land not served by a public water system shall:</u> a. <u>demonstrate that the potable water needed to support the new development is physically available taking into account all water needs including firefighting, that the applicant has the legal right to use that water, and the water meets drinking water standards.</u> b. <u>As required by state law, applications for water rights or a permit-exempt well is not evidence of the legal right to use the water.</u></p>		<p>j. This policy is not needed, as the County already requires proof of water availability for new development.</p> <p>Further, King County believes it is prudent to await the Court's guidance that may address many of the issues you raised in comments on policies E-494, E-496, existing E-497, and proposed E-497 prior to making many of the changes you suggested.</p> <p>Additionally on E-495, This amendment is not needed. As a condition of the County's Municipal NPDES permit, we are now required to promote and use LID methods as the preferred method.</p>

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<p>Comments on the Public Review Draft of the 2016 Comprehensive Plan January 6, 2016 Page 16</p> <p><u>c. If the proposed water source is a permit-exempt well system, the applicant shall identify all land in a common ownership currently and before any land divisions and document that the proposed use and any other uses of the land currently or formerly in a common ownership will not exceed the daily maximum withdrawal authorized by a permit-exempt well system.</u></p> <p><u>d. If the proposed water source is in an area mapped by the Washington State Department of Ecology as susceptible to salt water intrusion, the well shall be tested and if it does not meet drinking water standards for chloride concentrations it may not be used as a water source.</u></p> <p>Proposed E-497a b and c require more explanation. RCW 19.27.097 requires applicants for building permits for buildings that need potable water to provide evidence of an adequate water supply. RCW 19.27.097(1) provides:</p> <p>(1) Each applicant for a building permit of a building necessitating potable water shall provide evidence of an adequate water supply for the intended use of the building. Evidence may be in the form of a water right permit from the department of ecology, a letter from an approved water purveyor stating the ability to provide water, or another form sufficient to verify the existence of an adequate water supply. In addition to other authorities, the county or city may impose conditions on building permits requiring connection to an existing public water system where the existing system is willing and able to provide safe and reliable potable water to the applicant with reasonable economy and efficiency. An application for a water right shall not be sufficient proof of an adequate water supply.</p> <p>RCW 19.27.097(1) requires as evidence a “water right permit.” That a water right application is not sufficient proof of an adequate water supply shows that the legislature intended that building permit applicants must have the legal right to use the water. The Attorney General agreed with this reading writing that:</p> <p>In our opinion, an “adequate” water supply is one that is of sufficient quality and sufficient quantity to satisfy the demand created by the new building.</p> <p>....</p> <p>The pertinent exception to the permitting requirements is found in RCW 90.44.050, which allows the withdrawal of up to 5,000 gallons a day of ground water for specified purposes without a permit. If ground water is regularly used beneficially as provided in that statute, then the appropriator will be entitled to a “right equal to that established by a permit issued under the provisions” of chapter 90.44 RCW. <i>Id.</i></p>		<p>In relation to these items (bullet C) reflecting State Supreme Court’s decisions, the County believes this issue relatively setting in the case law and other provisions of the Plan are consistent, making this edit not necessary.</p> <p>Comments noted.</p>

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<p>Comments on the Public Review Draft of the 2016 Comprehensive Plan January 6, 2016 Page 17</p> <p>Consequently, any applicant for a building permit who claims that the building's water will come from surface or ground waters of the state, other than from a public water system, must prove that he has a right to take such water.⁴¹</p> <p>RCW 58.17.110 also requires King County to assure adequate potable water supplies are available when approving subdivision applications. Further, the County must assure that proposed developments proposing to use exempt wells are within the withdrawal limits applicable to those wells. As the Washington State Supreme Court has written:</p> <p style="padding-left: 40px;">¶ 61 Without a requirement that multiple subdivision applications of commonly owned property be considered together, the County cannot meet the statutory requirement that it assure appropriate provisions are made for potable water supplies. Instead, nondisclosure of common ownership information allows subdivision applicants to submit that appropriate provisions are made for potable water through exempt wells that are in fact inappropriate under <i>Campbell & Gwinn</i> when considered as part of a development, absent a permit. To interpret the County's role under RCW 58.17.110 to only require the County to assure water is physically underground effectively allows the County to condone the evasion of our state's water permitting laws. This could come at a great cost to the existing water rights of nearby property owners, even those in adjoining counties, if subdivisions and developments overuse the well permit exemption, contrary to the law.⁴²</p> <p>Proposed E-497a b and c implement these requirements.</p> <p>Adopt better protections from landside hazards for people and property. See Policy E-508 on page 5-86</p> <p>The <i>King County Regional Hazard Mitigation Plan</i> documents that landslides occur frequently in Pacific County.⁴³ So do avalanches.⁴⁴ In fact "[s]everal landslides occur in King County every year."⁴⁵</p> <p>⁴¹ AGO 1992 No. 17 accessed on Dec. 31, 2015 at: http://www.atg.wa.gov/ago-opinions/requirement-adequate-water-supply-building-permit-issued</p> <p>⁴² <i>Kititas County v. Eastern Washington Growth Management Hearings Bd.</i>, 172 Wn.2d 144, 178 – 81, 256, p.3d 1193, 1209 – 10 (2011) footnote omitted.</p> <p>⁴³ <i>King County Regional Hazard Mitigation Plan Update Volume 1: Planning-Area-Wide Elements</i> pp. 12-4 – 12-5 (July 2015) accessed on Dec. 31, 2015 at: http://www.kingcounty.gov/safety/prepare/EmergencyManagementProfessionals/Plans/RegionalHazardMitigationPlan.aspx; and the cited pages are enclosed with the paper original of this letter.</p> <p>⁴⁴ <i>Id.</i> at p. 8-2.</p> <p>⁴⁵ <i>Id.</i> at p. 12-7.</p>		<p>Comments noted; the referenced policy (E-508) has been updated in the Executive Recommended Plan.</p>

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The *King County Regional Hazard Mitigation Plan* also states that “[e]ngineering solutions to protect structures on or adjacent to large active landslides are often extremely or prohibitively expensive.”⁴⁶ If anything this overstates our ability to mitigate landslides. On a practical level, most landslides cannot be mitigated except through avoidance.⁴⁷ Recent research shows that long runout landslides are more common in Cascade foothills than had been realized.⁴⁸ This research documents that over the past 2000 years, the average landslide frequency in the area near the Oso landslide is one landslide every 140 years.⁴⁹ Given all of this data, we are concerned that modified Policy E-508 over emphasizes mitigation and underemphasizes avoidance. We are also concerned that the revised policy deletes references to avalanches which the *King County Regional Hazard Mitigation Plan* documents are a real hazard in King County.⁵⁰

We are also concerned that Policy E-508 only calls for reviewing developments in or adjacent to landslide hazards. Landslide hazards are capable of damaging property much farther away than adjacent properties. The 2014 Oso slide ran out for over 6,562 feet even through the slope height was 600 feet.⁵¹ The runout distances for 24 other landslides recently identified in the Oso vicinity ranged from a low of 525 feet to 6,496 feet.⁵² A 2006 landslide at Oso traveled over 300 feet.⁵³ The 2013 Ledgewood-Bonair Landslide on Whidbey Island extended approximately 300 feet into Puget Sound.⁵⁴ In a

Comment noted.

⁴⁶ *Id.* at p. 12-4.

⁴⁷ Lynn M. Highland and Peter Bobrowsky, *The Landslide Handbook—A Guide to Understanding Landslides* pp. 14 – 24 (U.S. Geological Survey Circular 1325, Reston, Virginia: 2008) accessed on Dec. 31, 2015 at: <http://pubs.usgs.gov/circ/1325/>.

⁴⁸ Sean R. LaHusen, Alison R. Duvall, Adam M. Booth, and David R. Montgomery, *Surface roughness dating of long-runout landslides near Oso, Washington (USA), reveals persistent postglacial hillslope instability* GEOLOGY pp. *2 – 3, published online on 22 December 2015 as doi:10.1130/G37267.1; Geological Society of America (GSA) Data Repository 2016029, Data repository for: Surface roughness dating of long-runout landslides near Oso, WA reveals persistent postglacial hillslope instability p. 4 both included with the paper original of this letter.

⁴⁹ Sean R. LaHusen, Alison R. Duvall, Adam M. Booth, and David R. Montgomery, *Surface roughness dating of long-runout landslides near Oso, Washington (USA), reveals persistent postglacial hillslope instability* GEOLOGY p. *2, published online on 22 December 2015 as doi:10.1130/G37267.1.

⁵⁰ *King County Regional Hazard Mitigation Plan Update Volume 1: Planning-Area-Wide Elements* p. 8-2 (July 2015).

⁵¹ GSA Data Repository 2016029, Data repository for: Surface roughness dating of long-runout landslides near Oso, WA reveals persistent postglacial hillslope instability p. 4.

⁵² *Id.*

⁵³ Jeffrey R. Keaton, Joseph Wartman, Scott Anderson, Jean Benoit, John deLaChapelle, Robert Gilbert, David R. Montgomery, *The 22 March 2014 Oso Landslide, Snohomish County, Washington* p. 1 (Geotechnical Extreme Events Reconnaissance (GEER): July 22, 2014). Accessed on Jan. 5, 2016 at: http://www.geerassociation.org/GEER_Post%20EQ%20Reports/Oso_WA_2014/ and enclosed with the paper original of this letter.

⁵⁴ Stephen Slaughter, Isabelle Sarikhan, Michael Polenz, and Tim Walsh, *Quick Report for the Ledgewood-Bonair Landslide, Whidbey Island, Island County, Washington* pp. 3 – 4 (Washington State Department of Natural Resources, Division of Geology and Earth Resources: March 28, 2013). Accessed on Nov. 30, 2015 at: http://www.dnr.wa.gov/publications/ger_qr_whidbey_island_landslide_2013.pdf

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study of shallow landslides along Puget Sound from Seattle to Everett, the average runout length was 197.5 feet (60.2 m) and the maximum runout length was 771 feet (235 m).⁵⁵ So we recommend that all landslides with the potential to harm people and property be identified and proposed developments only allowed if they would be safe from the adverse impacts of those landslides.

It is important to understand that homeowners insurance does not cover the damage from landslides. "Insurance coverage for landslides is uncommon. It is almost never a standard coverage, and is difficult to purchase inexpensively as a policy endorsement."⁵⁶

None of the Oso victims' homes were covered by insurance for landslide hazards.⁵⁷ And that is common when homes are damaged by landslides.⁵⁸ For example, on March 14, 2011, a landslide damaged the home of Rich and Pat Lord.⁵⁹ This damage required the homeowners to abandon their home on Norma Beach Road near Edmonds, Washington. Because their homeowners insurance did not cover landslides, they lost their home.⁶⁰ This loss of what may be a family's largest financial asset is common when homes are damaged or destroyed by landslides and other geological hazards.

Landslide buyouts are rare and when they occur the property owner often only recovers pennies on the dollar. The property owners bought out after the Aldercrest-Banyon landslide in Kelso, Washington destroyed their homes received 30 cents on the dollar.⁶¹ This is underlines why preventing development in landslide hazards is ordinary consumer protection.

⁵⁵ Edwin L. Harp, John A. Michael, and William T. Laprade, *Shallow-Landslide Hazard Map of Seattle, Washington* p. 17 (U.S. Geological Survey Open-File Report 2006-1139: 2006) accessed on Nov. 30, 2015 at: <http://pubs.usgs.gov/of/2006/1139/>

⁵⁶ Robert L. Schuster & Lynn M. Highland, *The Third Hans Cloos Lecture: Urban landslides: socioeconomic impacts and overview of mitigative strategies* 66 BULLETIN OF ENGINEERING GEOLOGY AND THE ENVIRONMENT 1, p. 22 (2007) accessed on April 2, 2015 at: http://193.134.202.10/pub/TRAMM/Workshop_EWS/Literature/Schuster_and_Highland_2007_Bulletin_of_Engineering_Geology_and_the_Environment.pdf

⁵⁷ Sanjay Bhatt, *Slide erased their homes, but maybe not their loans* *The Seattle Times* (April 2, 2014) accessed on March 27, 2015 at: http://old.seattletimes.com/html/latestnews/2023278858_mudslidefinancial.html

⁵⁸ *Id.*

⁵⁹ Ian Terry, *Abandoned and trashed after mudslide, Edmonds house now for sale* *The Herald* (Feb. 11, 2015). The house is for sale after the bank who held the Lord's mortgage took ownership of the home. *Id.* accessed on April 2, 2015 at: <http://www.heraldnet.com/article/20150211/NEWS01/150219829>

⁶⁰ *Id.* at p. 26.

⁶¹ Isabelle Sarikhan, *Sliding Thought Blog, Washington's Landslide Blog* Landslide of the Week – Aldercrest Banyon Landslide July 29, 2009 accessed on April 3, 2015 at: <https://slidingthought.wordpress.com/2009/07/29/landslide-of-the-week-aldercrest-banyon-landslide/>

Comments noted.

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<p>Comments on the Public Review Draft of the 2016 Comprehensive Plan January 6, 2016 Page 20</p> <p>So to protect subsequent purchasers and residents in areas subject to landslide and avalanche hazards, we recommend the following revisions to Policy E-508 with our additions underlined and our deletions struck through.</p> <p>E-508 Avalanche or Landslide Hazard Areas<u>Avalanche and Landslide hazard areas, including areas subject to the runoff from a landslide, shall</u> should not be developed unless the risks and adverse impacts associated with such development can be reduced to a non-<u>minimized so that they are at a non-</u>significant level. Development proposed in <u>areas likely to be affected by a landslide adjacent to or avalanche or landslide hazard areas</u> shall be adequately reviewed and mitigated <u>as needed to eliminate or minimize risk to the development as well as to ensure the</u> development does not increase landslide or erosion hazards that would adversely impact <u>downstream adjacent</u> properties or natural resources.</p> <p>Include Transportation Element Requirements in the Comprehensive Plan Update</p> <p>The Growth Management Act, in RCW 36.70A.070(6)(iii) and (iv), provides in part that a transportation element shall include:</p> <p>(E) Forecasts of traffic for at least ten years based on the adopted land use plan to provide information on the location, timing, and capacity needs of future growth;</p> <p>(F) Identification of state and local system needs to meet current and future demands. Identified needs on state-owned transportation facilities must be consistent with the statewide multimodal transportation plan required under chapter 47.06 RCW;</p> <p>iv) Finance, including:</p> <p>(A) An analysis of funding capability to judge needs against probable funding resources;</p> <p>(B) A multiyear financing plan based on the needs identified in the comprehensive plan, the appropriate parts of which shall serve as the basis for the six-year street, road, or transit program required by RCW 35.77.010 for cities, RCW 36.81.121 for counties, and RCW 35.58.2795 for public transportation systems. The multiyear financing plan should be coordinated with the ten-year investment program developed by the office of financial management as required by RCW 47.05.030;</p>		<p>Thank you for the information and suggested revisions. While not identical to what was proposed, the policy is revised in Executive Recommended Plan.</p> <p>The transportation element requirements noted are included in the Executive Recommended plan chapter as well as the related transportation appendices.</p>

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<p>Comments on the Public Review Draft of the 2016 Comprehensive Plan January 6, 2016 Page 21</p> <p>We were unable to find these provisions in the proposed update. We recommend they be included.</p> <p>Include the required six year funding plan in the Capital Facility Element</p> <p>RCW 36.70A.070(3)(d) provides in relevant part that a “capital facilities plan element” shall include an “at least a six-year plan that will finance such capital facilities within projected funding capacities and clearly identifies sources of public money for such purposes ...” We were unable to find the funding plan and recommend it be included.</p> <p>Recommendations for Advancing Health and Equity in King County through the Comprehensive Plan Update.</p> <p>A comprehensive plan can be a vehicle for connecting the departments by which local government is organized to achieve broad goals of environmental, economic and social equity and health in a community. Incorporating race and social equity goals and objectives for each element of the comprehensive plan reflect the ways issues of access to opportunity, displacement, and inclusion will be addressed in each issue area. Ideally, the different issue areas will work together to achieve the larger race and social justice goals that the County has set.</p> <p>With these opportunities in mind, we offer below a set of overarching and specific recommendations for incorporating health and equity in the comprehensive plan update. The Public Review Draft of the 2016 Comprehensive Plan makes significant improvements in policies that will address the existing disparities in health and equity throughout King County. The inclusion of equity, social and environmental justice, addressing health disparities and expanding transportation choices as guiding principles and objectives, and the related goals and policies furthers King County’s commitment to race and social justice in accordance with its Equity and Social Justice ordinance.</p> <p>Overarching Recommendations</p> <ol style="list-style-type: none"> 1. Set up front the current conditions in King County on issues of race and social equity and use supportive data to illustrate equity concerns, recommendations and potential implications. 2. Integrate a clear vision and components for an equitable future throughout the Comprehensive Plan. 3. Frame each element with the role that element plays in achieving equity. 4. Set forth measurable objectives to review and track the effectiveness of each goal and proposed policy. 		<p>The Capital Facilities Appendix addresses these requirements with further detail found in King County Functional Plans that are referenced within this appendix and the Transportation Appendix.</p> <p>The Executive Recommended Plan incorporates many suggestions with respect to the new Housing, Health and Human Services Chapter, as follows: H-105, staff added verbiage concerning engagement of marginalized populations in development, implementation and evaluation of countywide affordable housing goals, policies and programs; H-108, staff added verbiage for family-sized and market rate housing concerning universal design; H-118, staff added verbiage suggested to fair housing policy; H-144, staff added verbiage to encourage inclusionary incentives with mandatory policies in market rate housing projects; H-155 staff added verbiage regarding coordination of community development plans and investments in support of the plans and desires of communities located in the 20% to 30% of the County with the most disparate health and well-being outcomes; H-174, staff added verbiage concerning “cultural relevance” needs in homebuyer assistance and financing programs.</p>

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<p>Comments on the Public Review Draft of the 2016 Comprehensive Plan January 6, 2016 Page 22</p> <p>Specific Recommendations</p> <p>The following items should be included or strengthened to further improve the County's commitment to race and social justice. Our additions are underlined and our deletions are struck through. We label new proposed policies as "new policy."</p> <p>Regional Planning</p> <p>Strengthen Existing Policies:</p> <p>RP-206 King County will protect, restore and enhance its natural resources and environment, encourage sustainable agriculture and forestry, reduce climate pollution and prepare for the effects of climate change, including consider of addressing the inequities and disparities that may be caused by climate change <u>or adaptation and mitigation policies and programs.</u></p> <p>Urban Communities</p> <p>Strengthen Existing Policies:</p> <p>U-106 Most population and employment growth should locate in the contiguous Urban Growth Area in western King County, especially in cities and their Potential Annexation Areas, <u>and look for ways to achieve equitable outcomes for all county residents.</u> Cities in the Rural Area should accommodate growth in accordance with adopted growth targets.</p> <p>U-108 King County should support the development of Urban Centers to meet the region's needs for housing, jobs, services, culture and recreation and to promote healthy, <u>equitable</u> communities; improving access to these services helps address social and economic needs of all residents, including disadvantaged communities. Strategies may include exploring opportunities for joint development or transit-oriented development, siting civic uses in mixed-use areas, <u>increasing employment growth in areas that are convenient to residential populations; community benefit agreements to incorporate affordable housing and living wage career path jobs for marginalized populations,</u> and leveraging or utilizing existing county assets in urban centers.</p> <p>New Urban Communities Policies:</p> <p>New Policy: <u>Strive to eliminate known race and social disparities by addressing the inequitable distribution of opportunity throughout the county that limits marginalized populations ability to reach their full potential.</u></p> <p>New Policy: <u>Coordinate planning and community development investments in areas with high displacement risks to support marginalized communities as communities</u></p>		<p>Thank you for comments and suggested policies. We agree with all of your comments. We have incorporated all of your concepts within the framework of the Housing, Health and Human Services Chapter, which covers both the urban communities in King County and also rural pockets of poverty in the County that also need attention in our equity and social justice work (see the following policies in that chapter, H –110,118,124,155,202 and 201 thru 208; see also U-108 and U-122a). In addition, we also included policy edits addressing equity in Chapter 10, Economic Development (see ED-101,211a&b,302,303).</p>

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<p>Comments on the Public Review Draft of the 2016 Comprehensive Plan January 6, 2016 Page 23</p> <p><u>experience changes in their demographics, built environment, and real estate markets.</u></p> <p><i>New Policy:</i> <u>Coordinate planning and community development investments in areas where access to opportunities are limited to support marginalized communities so that quality of life outcomes are equitable distributed for all people.</u></p> <p><i>New Policy:</i> <u>Quantifiable indicators of race and social equity will be measured over time and reported annually as part of the County's ongoing monitoring of the Plan's effects on race and social equity over time. Equity measurements will track growth, displacement, and access to determinants of race and social equity and be disaggregated by race, ethnicity and income when possible.</u></p> <p><i>New Policy:</i> <u>Encourage more affordability and variety of housing types in urban centers that have higher access to opportunity and access to services.</u></p> <p><i>New Policy:</i> <u>Increase growth in middle-income jobs and educational opportunities in areas that are convenient to marginalized populations as a way to promote economic mobility and reduce commutes.</u></p> <p><i>New Policy:</i> <u>Track growth rate of housing unit size and affordability levels, as well as growth rate of jobs across income quintiles.</u></p> <p>Housing and Human Services</p> <p>Strengthen Existing Policies:</p> <p>H-108 King County shall work with other jurisdictions to encourage the use of universal design in the development of affordable, family-sized, and market-rate housing.</p> <p>H-144 King County will ensure that required and/or incentivized affordable housing unit created through its land use policies and regulations is of generally the same quality and design as market housing of a similar size and density. <u>King County will encourage on-site performance of incentivized affordable housing units.</u></p> <p>H-174 King County should work with local lenders and non-profit organizations providing home ownership assistance to expand assistance for first-time eligible income-qualified homebuyers, including homebuyer education and counseling, mortgage default and foreclosure counseling, <u>culturally-competent</u> low-cost financing and assistance with down payments and closing costs, and alternative ownership housing models such as land trusts, co-housing, etc.</p> <p>New Housing and Human Services Policies</p>		<p>See response on previous page</p>

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<p>Comments on the Public Review Draft of the 2016 Comprehensive Plan January 6, 2016 Page 24</p> <p>New Policy: <u>King County shall work with residents and stakeholders to understand the rights protected by federal, state, and local fair housing laws and to promote equitable housing practices for protected classes through fair housing education and enforcement.</u></p> <p>New Policy: <u>Align affordable housing investments and policies with infrastructure investments that increase the quality of life of disinvested communities, especially transit investments.</u></p> <p>New Policy: <u>Engage marginalized populations in the development, implementation, and evaluation of county-wide affordable housing goals, policies and programs.</u></p> <p>Parks, Open Space and Cultural Resources</p> <p>Strengthen Existing Policies:</p> <p>P-105 King County should facilitate <u>affordable and culturally-accessible</u> educational, interpretive and aquatic programs on county-owned properties that further the enjoyment, understanding and appreciation of the natural, cultural and recreational resources of the park system and the region.</p> <p>Transportation</p> <p>New Transportation Policies:</p> <p>New Policy: <u>Prioritize transit service to meet the diverse needs of marginalized populations, including access between high poverty neighborhoods and key services: healthy foods, health clinics, job centers, and schools.</u></p> <p>New Policy: <u>Transportation policies and investments are informed by engaging marginalized populations in their planning, implementation, and evaluation.</u></p> <p>New Policy: <u>Provide opportunities for marginalized communities to inform and participate in auto-trip reduction programs.</u></p> <p>Economic Development</p> <p>New Economic Development Policies:</p> <p>New Policy: <u>Address the needs of culturally relevant businesses most vulnerable to displacement due to redevelopment pressure through policies and funding decisions.</u></p> <p>New Policy: <u>King County shall assist businesses, property owners and other jurisdictions in meeting the needs of marginalized populations in multi-cultural business districts where small businesses are at risk of displacement, through incentives</u></p>		<p>A new policy T-253a has been added to address auto trip reduction program comment.</p> <p>Transit/transportation policies and transit plans already emphasize equity considerations.</p> <p>New policy T-104 emphasizes equity considerations, and T-511 has been edited to call out inclusion of low income communities, people of color, and immigrant and refugee populations.</p> <p>Comment noted re: P-105. While King County believes that already address the affordable language through the County's feewaiver/scholarship-setting rules codified in Title 7, the County agrees that this addition strengthens the policy and enhances the County's efforts to get more diverse youth out on our sites through various educational, environmental and recreation opportunities.</p>

FUTUREWISE — MULTIPLE TOPICS

COMMENT

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and economic development measures. County programs and incentives for economic development shall support and be coordinated with preservation of multi-cultural business districts.

New Policy: Encourage a business climate that supports new investment, job creation, resilience and that values cultural diversity and inclusion.

New Policy: Encourage industry clusters to grow and expand in low-income communities to train and hire local residents.

New Policy: Assess new taxes, regulations, incentives, and other government policies and investments to determine the benefits and burdens on marginalized populations.

Recommended Code Changes

Generally we support the staff recommendations for the Code Changes. We are concerned about the recommendation that Chapter 21A.42 KCC be amended to establish “criteria for director approval of expansions of agricultural use or development beyond the criteria in K.C.C. 21A.08.090 and establishing criteria for director approval for siting of agricultural support facilities on properties on or adjacent to the agricultural production districts where agriculture is not the existing primary use of the property.” While we support agricultural support facilities that are accessory to agricultural uses as RCW 36.70A.172 allows, we are concerned that allowing certain types of use may raise the cost of agricultural lands beyond what farmers can afford.⁶² This is already a problem in many areas of King County. We urge caution in drafting this amendment.

We also recommend that the counties regulations for landslide hazard areas be updated. The County’s current regulations are inadequate to prevent a tragedy such as occurred at Oso in Snohomish County.

We also recommend that the development regulations related to water supplies for land divisions and building permits be updated to reflect our policy recommendations above. This is necessary to comply with the Growth Management Act.

If you have any questions or require additional information please contact me at 206-343-0681 Ext. 118 or tim@futurewise.org. Thank you for considering our comments.

⁶² Dennis Canty, Alex Martinsons, and Anshika Kumar, *Losing Ground: Farmland Protection in the Puget Sound Region* pp. 21 – 22 (American Farmland Trust, Seattle Washington, Jan. 2012) accessed on Jan. 5, 2016 at <https://dan2dc132bb150caff1aa-7bb737f4349b47aa42dce777a7245264.s1.cf5.rackcdn.com/Losing-Ground-Farmland-Protection-in-the-Puget-Sound-Region.pdf> and enclosed with the paper original of this letter.

RESPONSES

Comments noted. Policies have been revised in the Economic Development chapter that address many of these topics.

Comment noted regarding KCC 21.A.08.090 and establishing criteria for director approval for siting of agricultural support facilities on properties on or adjacent to the agriculture production districts where agriculture is not the existing primary use of the property. The support facilities contemplated under this provision and the associated allowable uses would be limited to land that is poor quality for farming or already in existing structures such as a garage or outbuilding. The County Agricultural Program and the Agricultural Commission reviewed the code changes, and staff and commissioners are well aware of the issue regarding cost of land – residential use, which we already allow, is greater driver of increasing land value than the changes contemplated by the policy and associated code changes. As an example, a livestock slaughter facility in the Snoqualmie Valley, located on a very small parcel, provides much needed services to farms. At this point we do not allow the use because it is not accessory to farming on the parcel. The administrative process envisioned would enable a landowner to seek permission for such a use, taking into account issues such as appropriateness of the site for the use.

FUTUREWISE — MULTIPLE TOPICS		
COMMENT	RESPONSES	
<p>Comments on the Public Review Draft of the 2016 Comprehensive Plan January 6, 2016 Page 26</p> <p>Very Truly Yours,</p>  <p>Tim Trohimovich, AICP Director of Planning & Law</p> <p>Enclosures</p>		

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NONA GANZ – MULTIPLE TOPICS	
COMMENT	RESPONSES
<p><i>From: Nona Ganz [mailto:Nonaganz@frontier.com]</i> <i>Sent: Wednesday, January 06, 2016 1:41 PM</i></p> <p>Thank you for the opportunity to comment on the King County 2016 Comprehensive Plan Draft. Here are my priorities for the future of King County:</p> <p>Make King County more affordable. People should be able to live close to where they work. Parts of our County are becoming less affordable, forcing more families to move farther away from where they work, leading to significant negative social, economic and environmental impacts. We need the Comprehensive Plan to support strategies that create greater affordability near key transit centers and employment centers. It should include more funding for affordable housing, and it should include policies that increase the supply of market rate, family size, and affordable units.</p> <p>Put growth in high opportunity locations with good transit service. With the expansion of light rail and bus rapid transit, we should implement an urban communities strategy, which will help the region grow efficiently and responsibly over the next twenty years. We need to have a strategy in place so that increased growth around transit centers does not lead to displacement of people and small businesses. We should have policies, programs and investments that help people and businesses stay in their neighborhoods if they choose.</p> <p>Keep investing in our transportation system with innovative, multi-modal strategies that will keep us moving affordably, safely and sustainably. As King County continues to grow, we must change the way that we move around or we will become mired in gridlock and increased greenhouse gas emissions. Smart, strategic use of our limited roadways will be required to keep King County moving as we add more people and jobs over the next 20 years. We need investments in bike lanes, transit and sidewalks to give people many ways to get around safely while protecting our air and our environment.</p> <p>King County must continue to be a leader in addressing climate change. We need aggressive, bold action to meet our climate goals. Our transportation, land use, capital facilities and environmental goals and</p>	<p>Thank you for the comments regarding affordable housing. The 2016 Plan includes a new chapter on housing and human services; the policies therein have been strengthened to reflect the importance and challenges the region faces in meeting the housing need.</p> <p>The policies focus on placing growth in areas with good transit service. This means focusing growth within cities and centers and supporting transit oriented development.</p> <p>Comprehensive plan policies support multimodal transportation.</p> <p>Multiple chapters have been updated with policies related to Climate Change and reference the work of the Strategic Climate Action Plan and King County Cities Climate Collaboration (the K4-C).</p> <p>Policies related to landslide mapping and notification as well as emergency response have been updated and</p>

NONA GANZ – MULTIPLE TOPICS	
COMMENT	RESPONSES
<p>policies should work together to protect our natural environment and to prevent climate change. We need to prepare for climate impacts and be sure to protect our most vulnerable residents who are most at risk.</p> <p>Protect our natural resource areas and our rural communities. King County is home to some of the most beautiful farmlands and forest lands. We need to protect these areas to ensure local food sources, wildlife habitat, clean water resources, and recreation.</p> <p>Better Protect People and Property From Natural Hazards. The Oso disaster has underscored the need to better protect people and property from landslides and other natural hazards. Recent research has shown that Oso scale landslides are more common than previously believed. Improve comprehensive plan policies and regulations to protect people and property from natural hazards.</p> <p>Work towards a more equitable future for all. Not all of our residents and communities have the same access to opportunity. The County should be proactive and intentional about advancing race and social justice through its policies, programs and investments.</p> <p>Accountability and measurement. Quantifiable goals will help us track how we are doing. We should expand our metrics and make sure that we are moving in the right direction. It is critical that our tracking and accountability not just focus on county-wide results, but also on specific populations so that no one is getting left behind.</p>	<p>included in the 2016 Plan. The landslide policies were further refined, based on public comment, between the Public Review Draft and Executive Recommended Plan.</p> <p>Policies have been added and updated throughout the 2016 Plan related to equity and social justice; further, mapping data has been included to help explain the relationship of ESJ to the geographies of the Growth Management Act.</p> <p>Chapter 12 includes a new Workplan section that includes an Action to develop a Performance Measures Program that is specifically related to the goals, and timeframes, of the Comprehensive Plan.</p>

RUDY GARZA – SUPPORT FOR WHITE CENTER CHAMBER COMMENTS	
COMMENT	RESPONSES
<p><i>From: Rudy Garza [mailto:Rudy.Garza@navos.org]</i> <i>Sent: Thursday, January 07, 2016 8:36 AM</i></p> <p>The comments presented by Elizabeth Gordon regarding the KC Draft Comprehensive Plan effectively</p>	<p>Comments noted.</p>

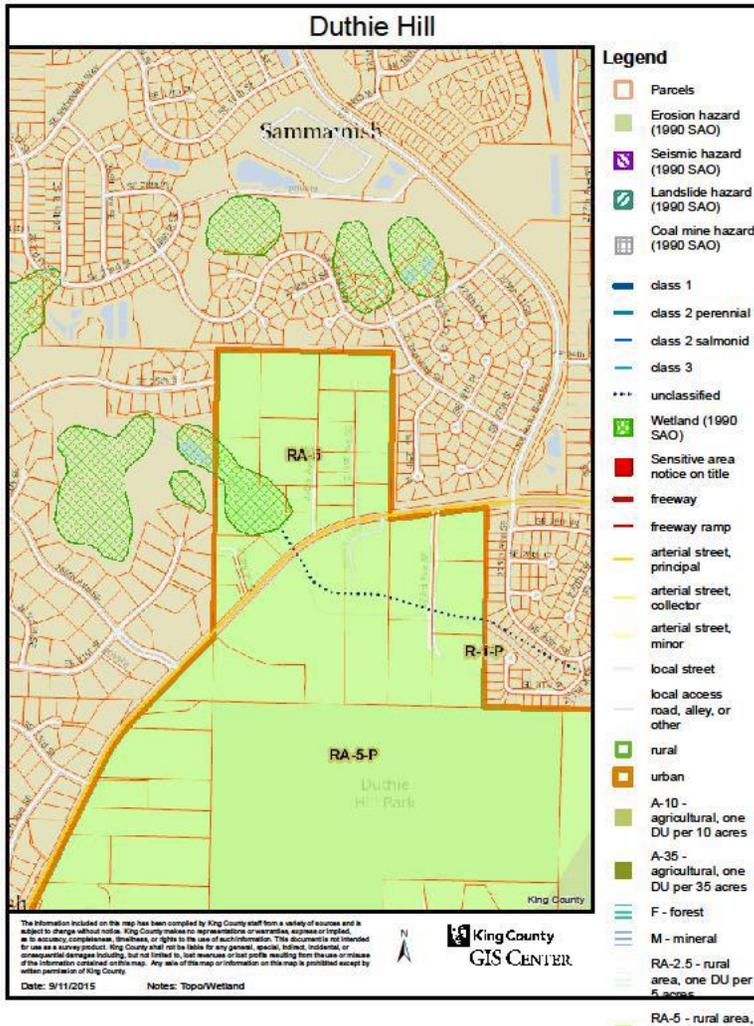
RUDY GARZA – SUPPORT FOR WHITE CENTER CHAMBER COMMENTS	
COMMENT	RESPONSES
<p>identify the areas where the Plan can be strengthened as well as issues that should be further studied and addressed. As coordinator of a community coalition in White Center, I fully endorse the recommendations identified by Elizabeth Gordon and look with anticipation that the County will take a serious look at these.</p>	

DARIN GOEHNER (MOSS ADAMS) – DUTHIE HILL NOTCH AREA ZONING STUDY	
COMMENT	RESPONSES
<p><i>From: Darin Goehner [mailto:Darin.Goehner@mossadams.com]</i> <i>Sent: Saturday, December 12, 2015 8:08 AM</i></p> <p>RE: Sammamish Request – Duthie Hill Notch Growth Management Planning Council</p> <p>Dear King County Executive Constantine,</p> <p>We are writing to you in regards to the King County’s 2016 Comprehensive Plan Update recommendation to explore the Duthie Hill Notch (Duthie Notch) four to one proposal. On 12/2/15, I attended the King County 2016 Comprehensive Plan Update forum in Fall City. I had an opportunity to make a few, brief comments at the meeting, but we are concerned that my comments, as well as the opinions of several others, were not heard by the King County staff and Kathy Lambert. This letter shall serve as written evidence of our concerns with the current four to one proposal in the 2016 Comprehensive Plan Update.</p> <p>Direct connection to larger rural area – currently contiguous. Proposal for Four to One would separate contiguous rural/open space.</p> <p>We found it interesting that at the beginning of the King County 2016 Comprehensive Plan Update on 12/2/15, King County showed a very nice video of the intention of UGA and all that has been accomplished to protect rural land. Yet, immediately after showing the video about “putting a fence</p>	<p>Comments noted; these are consistent with the recommendations in the Area Zoning Study.</p>

DARIN GOEHNER (MOSS ADAMS) – DUTHIE HILL NOTCH AREA ZONING STUDY	
COMMENT	RESPONSES
<p>around the urban property to the west as to not encroach on rural property to the north, south, and east”, the Duthie Notch four to one proposal was presented. <u>The four to one proposal for the Duthie Notch is in direct conflict with the beautiful video developed by King County.</u></p> <p>The Duthie Notch proposal calls for a four to one with none of the rural property retained within the Duthie Notch...rather, the 80% rural exchange will be “somewhere else” in Sammamish. Again, the required 80% rural property is currently proposed to be separate from the Duthie Notch property. This is a problem in the current four to one proposal as all 26 acres of current rural property (contiguous to massive rural property to the south – see below) are proposed to become zoned as urban.</p>	<p>To clarify, there is NO Four to One proposal at this time. As noted in the updated Area Zoning Study, a group of planning director-level staff called the Interjurisdictional Team discussed options with the City of Sammamish's staff.</p>

DARIN GOEHNER (MOSS ADAMS) – DUTHIE HILL NOTCH AREA ZONING STUDY

COMMENT



RESPONSES

This was done at the direction of the direction of the Growth Management Planning Council, a multijurisdictional group that helps the cities and county collaborate. The results of these discussions are elaborated upon in the Area Zoning Study. In short, none of the options developed by Interjurisdictional Team are supported by the City of Sammamish and as of the time of printing of the Executive Recommended Plan, the work of the Interjurisdictional Team is complete.

DARIN GOEHNER (MOSS ADAMS) – DUTHIE HILL NOTCH AREA ZONING STUDY	
COMMENT	RESPONSES
<p>We're not sure we understand the need to rezone a rural piece of property that is already clearly connected to a massive rural area. It's a slippery slope, as once you give up rural property connected to other large rural property, what's to prevent the urban sprawl that the UGA was founded to prevent? <u>The four to one proposal of the Duthie Notch is in direct conflict with the tenets of the UGA as none of the rural area is maintained in the Duthie Notch.</u></p> <p>Environmental issues</p> <p>The following provides additional details and evidence for each of the above reasons. Much of supporting documentation is sourced from prior King County Executive Office studies and testimony.</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p>1 – Adverse environmental impacts to the neighboring wetlands and Patterson Creek, a natural bearing salmon stream. UGA lands must be free of environmental constraints and that is not the case the Notch.</p> </div> <p>The Duthie Hill Notch includes a pond and wetlands that flow from two locations into Patterson Creek, a natural bearing salmon stream. Future development in the notch threatens both the environmentally sensitive wetlands in the Notch and Patterson Creek.</p> <p>The following studies and King County Executive staff public comments provide evidence of the potential <u>negative environmental impacts</u>:</p> <ul style="list-style-type: none"> • 2012 King County Comprehensive Plan Update, Sammamish UGA, Area (August 29, 2012) <ul style="list-style-type: none"> ○ The study recommends “against” the annexation of the Notch to the City of Sammamish. <p style="margin-left: 40px;"><i>“A re-designation to urban would require improvement in the road infrastructure and may impact the pond and mapped wetland. KCCP policy U-102(d) calls for UGA lands to be free of environmental constraints. The pond, stream and wetland make re-designation of the study area to urban inconsistent with this policy.”</i></p> <p style="margin-left: 40px;"><i>Executive Staff Recommendation – “Make no adjustment to the King County Comprehensive Plan (KCCP) Land Use Map and zoning for the Duthie Hill Road study.</i></p> 	<p>The presence of environmental features is not disallowed on the Urban portion of a Four to One proposal; the criteria and adjustments related to this are discussion in the policies and King County Code.</p>

DARIN GOEHNER (MOSS ADAMS) – DUTHIE HILL NOTCH AREA ZONING STUDY	
COMMENT	RESPONSES
<p><i>(Appendix A, page 3)</i></p> <ul style="list-style-type: none"> King County Executive Staff, Lauren Smith, comments to the King County Council on December 3, 2012 regarding the Notch proposal – clearly outline the concerns associated with the environmentally sensitive features of the Notch and this was a major reason for the Executive’s opposition to the proposal in 2012. <p>Below are several of Ms. Smith’s comments outlining the reasons the Executive opposed the proposal.</p> <ul style="list-style-type: none"> <i>“In this case the Notch contains the headwaters of Patterson Creek, which is an important salmon bearing stream; it was left out of the UGA for that reason.”</i> <i>“the water system feeds a major salmon bearing system in Unincorporated King County, those types of lands are not appropriate for inclusion in the Urban Growth Area.”</i> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p>2-The City of Sammamish has not provided evidence that the additional urban lands are required to support their adopted growth rate targets. This is a key criteria for moving lands from rural to urban. As a result, annexation of the Duthie Hill Notch is in inconsistent with the County’s UGA policies.</p> </div> <p>The City of Sammamish has not demonstrated a lack of buildable lands for increased density or jobs. This is a key criteria in moving lands from rural to urban and the city has not satisfied this requirement.</p> <ul style="list-style-type: none"> Growth Management Planning Council Meeting, Presentation by Paul Reitenbach – September 11, 2012 “The reasons this proposal are not supported by the Executive include: <ul style="list-style-type: none"> <i>“No evidence has been submitted by the City of Sammamish that additional urban land is needed to accommodate their adopted growth targets.” (Appendix B, page 5)</i> 	<p>Comments noted. Please note that Four to One proposals allowed the urban growth area boundary to be moved even if there is sufficient capacity. This approach has been upheld at by the courts as a valid innovative land use tool and public benefit.</p>

DARIN GOEHNER (MOSS ADAMS) – DUTHIE HILL NOTCH AREA ZONING STUDY	
COMMENT	RESPONSES
<p data-bbox="205 321 1423 391">3-UGA Border Irregularities and Notches are common in the UGA and not adequate reason to transfer lands from rural to urban.</p> <ul style="list-style-type: none"> <li data-bbox="237 428 1434 529">• The request to amend the Countywide Planning Policy DP-16 and annex the Duthie Hill Notch into Sammamish to address irregularities in borders in <u>not appropriate</u> or <u>adequate</u> rationale to amend the Countywide Planning Policy. <li data-bbox="237 570 1434 808">• King County Executive Staff, Lauren Smith, Comments to the King County Council on December 3, 2012 regarding the Notch proposal <ul style="list-style-type: none"> <li data-bbox="331 672 1434 808">○ <i>“Little notches like this are all up and down the Urban Growth Boundary, these are either environmentally sensitive areas or areas that lack sewers or other criteria why it’s not appropriate to include in the Urban Growth Area. In this case, the Notch contains the headwaters of Patterson Creek which is an important salmon bearing stream”</i> <p data-bbox="191 846 1241 873">Do you approve of how one of your council members is representing your council?</p> <p data-bbox="191 914 1434 1409">At the meeting on 12/2/15, Kathy Lambert passionately made the comment that the original exclusion of the Duthie Notch in the City of Sammamish incorporation was “wrong”. Kathy Lambert appears to be personally upset with the original carve out of the Notch and bent on changing the original decision of the property owners, King County and the City of Sammamish at all costs. We encourage Ms. Lambert and others to analyze the proposal on behalf of their constituents rather than their personal agendas/beliefs. Ms. Lambert continued to shake her head in disagreement to each constructive comment from anyone opposing the Notch rezoning proposal, made incorrect statements regarding property owners’ support of the four to one proposal, and appears to be bullying others to achieve her personal agenda. It is clear that Ms. Lambert is not listening with an open mind to the attendees at the meeting (two of them property owners within the Duthie Notch) and their concerns. <u>Modifying the UGA may benefit three private parties in the Duthie Notch, but it clearly damages over 200 families in four congruent communities given the City of Sammamish traffic study of 2015.</u> The 200 families in four congruent communities only accounts for those communities along SE 25th Street to the west of the Duthie Notch. There are many more families that would be adversely affected by the proposed UGA modification to the north, east and south of the Duthie Notch as well.</p>	<p data-bbox="1457 354 1892 483">This is correct. An illustrative analysis of this issue was conducted and the results are included in the updated Area Zoning Study.</p>

DARIN GOEHNER (MOSS ADAMS) – DUTHIE HILL NOTCH AREA ZONING STUDY	
COMMENT	RESPONSES
<p>Further, negotiations for the four to one proposal are occurring between King County and the City of Sammamish <u>without</u> the inclusion of the property owners who are directly affected. In our opinion, <u>government should not be working behind the scenes to the exclusion of their constituents and owners of properties affected by two governmental agencies' decisions.</u> As Lincoln reminded us in the Gettysburg address, "government of the people, by the people, for the people"...those property owners directly affected by King County and City of Sammamish should not be excluded from the discussion or the decision.</p> <p>Conflict of Interest It is well known that Ben Yazici's girlfriend lives in the Duthie Hill Notch. He has delayed his retirement from the City of Sammamish and continues to be involved in negotiations with King County regarding the Duthie Notch rezoning and potential annexation to the City of Sammamish. <u>Negotiating with the City of Sammamish, which includes a city manager whose girlfriend owns property in the Duthie Notch, is clearly a conflict of interest.</u> The city employee's interest, and possibly he as well, stand to directly gain financial windfall if the four to one swap is approved. King County could open itself to a lawsuit if this conflict is not addressed.</p> <p>Is this about the City of Sammamish controlling Duthie Hill Road?</p> <p><u>If all of this is being done for 1500 feet of Duthie Hill Road, common sense would suggest that the same objective can be achieved without undermining the purpose of the UGA to the direct detriment of your constituents.</u> Please, don't rezone, swap land, or take any other unnecessary measures if the City of Sammamish only wants rights to improve and maintain Duthie Hill Road. We implore you, please do not throw the baby out with the bathwater.</p> <p>Thank you very much for your consideration and prior support in opposing this proposal.</p> <p>We are asking for your help.</p> <p>Sincerely,</p> <p>Darin, Dawn, Christian and Nathan Goehner</p>	<p>King County held public meetings to discuss the area zoning study. Staff also met with multiple parties on this topic – including those supporting the expansion of the urban growth area and those opposed.</p> <p>Discussions are underway between the county and city regarding other options for Duthie Hill Rd.</p>

ELIZABETH GORDON (WHITE CENTER CHAMBER OF COMMERCE) – NORTH HIGHLINE	
COMMENT	RESPONSES
<p><i>From: E Gordon [mailto:unclemikes.bbq.backoffice@gmail.com]</i> <i>Sent: Wednesday, January 06, 2016 10:34 PM</i></p> <p>These comments have been endorsed by the White Center Chamber of Commerce as well as members of the North Highline Unincorporated Area Council. Other individuals and organizations may also contact you in support of these comments.</p> <p>These comments are not as in-depth as we had hoped - time to review and analyze the draft was limited. Regarding opportunity planning and mandatory inclusionary zoning for development, please see the two attached reports that may assist in plan policy development.</p>	<p>Comment noted.</p> <p>Thank you for including these two reference documents.</p>
<p style="text-align: center;"><u>Comments on the 2016 King County Draft Comprehensive Plan</u></p> <p>The opportunity to comment on the 2016 King County Draft Comprehensive Plan is much appreciated. The comments below focus on three important aspects of the plan that must be changed if the county’s principles of Social Equity and Justice are to be truly integrated into the 2016 Comprehensive Plan. These aspects include economic development, Community Service Areas, and departmental coordination and evaluation.</p> <p><u>North Highline Economic Development Sub-Area Planning</u></p> <p>One of the significant omissions from the Draft Comp Plan is the lack of an economic development sub-area plan for the North Highline Unincorporated Area:</p> <ul style="list-style-type: none"> – The last sub-area plan was developed over 20 years ago in 1994. – Over the last 20+ years, the <u>poverty rate has increased</u> in the North Highline UA despite the development by the county of a White Center Community Plan, substantial housing development and new school construction. – North Highline <u>meets the county criteria for economic development</u> found in the draft plan: low income population, recent immigrant groups, and lack of local employment opportunities. 	<p>The sub-area plan for North Highline/White Center (NH/WC) is scheduled in 2017, which is the second subarea planning process and is, in part, driven by the potential to work with the City of Seattle on planning for this area.</p> <p>Also, King County did receive and fund a “Letter of Interest” from the White Center Community Development Association and a coalition of CDA partners to participate in the Communities of Opportunity (COO) program, a joint program founded by King County and the Seattle Foundation.</p> <p>Communities of Opportunity has</p>

ELIZABETH GORDON (WHITE CENTER CHAMBER OF COMMERCE) – NORTH HIGHLINE	
COMMENT	RESPONSES
<ul style="list-style-type: none"> – Research indicates that <u>the lack of economic opportunity is a factor that contributes locally to poor school attendance, youth substance abuse, and other negative social indicators</u>. Local surveys among residents and youth support this research. – Without an economic development plan, <u>government agencies continue to take actions with a negative economic impact on White Center businesses</u>. These actions have included the relocation of the Metro transit center to Westwood Village in Seattle, lack of parking enforcement, construction of a street median that blocks emergency vehicles and traffic flow in the business district, and failure to coordinate traffic signals with Seattle at Roxbury resulting in traffic flows slowing to 1 block/10 minutes. – The White Center business district is again experiencing a <u>high vacancy rate</u> as there is <u>no unified planning and economic vision</u> for the area that includes residents, business owners, and commercial property owners. This roller coaster economic cycle destabilizes any progress that is made in the area. – For at least the last two years, the North Highline Unincorporated Council has stated the need for an economic development plan to the King County Council members, the Community Service Area department, and other county agencies. <u>County representatives have acknowledged the need for economic development</u> planning. – The Draft Comprehensive Plan places a <u>high priority on making food more accessible and developing food innovation districts</u>, yet due to the lack of economic development in White Center, in <u>the last year two halal food shops</u> – important to the local Muslim community – <u>have been forced to close</u> thus depriving local residents of easy accessibility to halal food items. <p>Community Service Area Priorities Chapter 11 focuses on the Community Service Areas and sub-area planning. Another significant omission from the Draft Comprehensive Plan is any priority given to the North Highline UA despite recognition by the legislative and executive branches of the county sub-area planning is badly needed.</p> <ul style="list-style-type: none"> – In the draft plan, the North Highline UA is not designated for sub-area planning until 2017. Vashon Island and Skyway are given higher priority without any reason given. – Economic development planning began in Skyway in 2015 even though a pre-existing, higher 	<p>made a three to five year commitment to this North Highline/White Center partnership to work through a co-design process to provide technical support and funding for strategies that address the intersections of health, housing, economic prosperity and community connections.</p> <p>The strategies will be specifically tailored to the North Highline/White Center sub-area, while using a strong results-oriented framework across the three areas chosen for Communities of Opportunity place-based grants. The Communities of Opportunity work will serve as a good platform to get started with some strategies and get prepared for sub-area planning in 2017.</p> <p>King County has supported mixed-income housing solutions in the North Highline/White Center area for many years through financial support to two HOPE VI projects that are transforming former exclusively public housing communities into vibrant mixed-income communities; and King County has funded affordable home ownership opportunities at more moderate income levels in the White Center area.</p>

ELIZABETH GORDON (WHITE CENTER CHAMBER OF COMMERCE) – NORTH HIGHLINE	
COMMENT	RESPONSES
<p>priority need had already been identified in North Highline UA. Again, no reason is given for the basis of the county’s priorities in sub-area planning.</p> <ul style="list-style-type: none"> – The only basis that has been given for the county’s lack of action in the North Highline UA has been its status as a Potential Annexation Area for Seattle in 2017 and the county’s reluctance to spend resources if the annexation goes through. <p>Interdepartmental Coordination and Evaluation</p> <p>In addition to emphasizing the importance of Social Equity and Justice Principles, the Draft Plan emphasizes the importance of interdepartmental coordination. The only way that the county will know whether these principles are being upheld or if county departments are collaborating effectively will be if there is adequate evaluation. Chapter 12 refers to Evaluation but it is not clear how this is supposed to happen, what the measurable outcomes of the Plan are, or how the county will be held accountable.</p> <ul style="list-style-type: none"> – The need for effective evaluation is evident from the impact of recent county actions where the importance of public transportation and physical activity are emphasized, yet two zone bus fares and scheduling still negatively impact North Highline UA residents. The Draft Plan states that economic development should be prioritized where there are transit centers, yet no mention is made that North Highline UA had a transit center that was taken away. – The Draft Plan mentions coordination of interlocal agreements between cities and the county for annexation of potential unincorporated areas, however it does not contain any criteria to measure the transparency of such discussions or the efforts to include interested parties in the community, including local elections. – The Draft Plan emphasizes the need for affordable housing and opportunity planning, yet does not address anywhere what the focus will be in areas such as North Highline UA where there is a need to increase incomes and encourage economic diversity by bringing in residents with higher incomes. The Plan does not mention the impact of the lack of economic diversity on school age children or residents of housing developments or how the Plan will be measured and evaluated to ensure that Social Equity and Justice Principles will increase in the lives of children in the North Highline UA. – The Draft Plan could be improved by county efforts to increase cross-cultural community engagement in the North Highline UA, such as the Dick Thurnau Memorial Park Celebration held 	<p>In addition, King County provides housing repair assistance to lower income homeowners in the area.</p> <p>Chapter 12 includes a new Workplan section that includes an Action to develop a Performance Measures Program that is specifically related to the goals, and timeframes, of the Comprehensive Plan.</p> <p>Comment noted. King County anticipates this will be a major issue when the subarea planning work begins in earnest in the 2017 Community Service Area Planning process.</p> <p>Comments noted regarding the importance of transparency in annexation processes.</p> <p>See comments above.</p> <p>The Community Service Area Planning process will include broad engagement with the community and build on established networks that are engaged with the current Community</p>

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<p>in November 2015.</p> <p>Attachments:</p> <ul style="list-style-type: none"> – Housing Policy Levers to Promote Economic Mobility. Urban Institute. Pamela Blumenthal, John McGinty. October 2015. – An Opportunity Agenda for Renters: The Case for Simultaneous Investments in Residential Mobility and Low-income Communities. Center for American Progress. David Sanchez, Tracey Ross, and Julia Gordon, with Sarah Edelman, Michela Zonta, and Andrew Schwartz. December 2015. 	<p>Service Area program.</p>

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<p><i>From: Peter Rimbos [mailto:primbos@comcast.net]</i></p> <p><i>Sent: Tuesday, January 05, 2016 11:10 AM</i></p> <p>At our January Monthly Meeting last night the full GMVUAC finalized and approved our KCCP PRD comments.</p> <ol style="list-style-type: none"> 1. The <u>second</u> of two formal sets of PRD Comments (see attached), which deal with <u>Economic- and Environment-related PRD Chapters/Sections</u>. 2. An amended (changes are shown in yellow background highlighting) set of part of our December 8, 2015, input which dealt with <u>Growth Management-related PRD Chapters/Sections</u> (see attached) 3. For your convenience, we've combined <u>all our PRD Comments into one file</u> for your convenience (also attached). 	<p>Comments noted. As these duplicate those shown above, responses are only provided for those new comments highlighted in yellow.</p>

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<p>As with all our formal inputs, we have cc'ed the Chairs/Presidents of the other Rural Area UACs/Associations to keep everyone informed.</p>	
<p>[Please Note: Included below is one correction and two additions in Chapter 3 and one addition in Chapter 9, all shown in yellow background, that amend our December 8, 2015 submittal]</p> <p>CHAPTER 1—REGIONAL PLANNING (No comments)</p> <p>CHAPTER 2—URBAN COMMUNITIES</p> <p>1. U-207 Earlier we submitted the following: <i>RECOMMENDATION: Revisit State law (RCWs 35.13.110; 35.13.270, and 35A.14.801) so that Counties and Cities have the opportunity to “negotiate” any transfer of bonded debt incurred within the annexed area. Approval of County bonded debt could be similar to how cities do so upon annexation by offering a vote to the annexing residents and allow the county to require a disapproval of the annexation should residents vote against the bonded debt continuance.</i> <i>QUESTION: Does the new R-320a policy in CHAPTER 3 take care of this?</i></p> <p>CHAPTER 3—RURAL AREA AND NATURAL RESOURCE LANDS</p> <p>1. R-201 [Typo, should have referred to R-101]. Earlier we submitted an addition, which we believe better captures Rural Character by defining the “other interested stakeholders.” Consequently, we resubmit the following for consideration: <i>RECOMMENDATION: Add the following to the end of the last sentence:</i> <i>“--unincorporated area councils, community organizations, rural residents, and rural business owners, including forest and farm owners, and rural communities, towns, and cities”</i></p> <p>NEW.R-201 a. <i>“The natural environment, particularly as evidenced by the health of wildlife and fisheries (especially salmon and trout), aquifers used for potable water, surface water bodies including Puget Sound and natural drainage systems and their riparian corridors; ”</i> <i>RECOMMENDATION: Strike parenthetical expression “(especially salmon and trout)” as no other item listed is so further defined.</i></p> <p>2. II. Rural Designation/B. Forestry and Agriculture in Rural King County/1. Forestry “a. Conduct projects on King County park lands to demonstrate sustainable forestry practices,” <i>QUESTION: What does this entail?</i></p>	<p>Typo in comment noted; policy R-101 has been revised to address this issue.</p> <p>Comment noted, but King County believes removal of the parentheses would confuse the meaning as these are sub-items to the prevailing item, i.e., fisheries.</p>

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<p>NEW.P. 3-15 (5th paragraph): <i>“The application of lower-density zoning or more restrictive standards could reduce the creation of new lots, but there are limited opportunities to address development of existing legal lots. One measure that would slow the growth rate on existing lots would be the establishment of an annual limit on the number of building permits to be issued in the Rural Area. This alternative would be more palatable if it were linked to a transfer of development rights program or a development rights purchase program.”</i></p> <p>RECOMMENDATION: <i>Strike the 2nd and 3rd sentences and add the following to the end of the 1st sentence: “, including transfer of development rights program or a development rights purchase program.” Our Rationale: Citizen Surveys we have conducted and published over the past decade continually indicate people do not want an annual limit on building permits in the Rural Area. In addition, the preceding paragraph states “The current rate of 200 homes per year could continue for decades.”</i></p> <p>3. R-309 We believe the primary part of our earlier submitted RECOMMENDATION was ignored: Obtaining TDRs from the same Travel Shed (and <u>not</u> having Rural Area serve as a receiving site for <u>any</u> TDRs). Consequently, we provide the following for consideration: RECOMMENDATION: <i>Add new sentence to be consistent with the intent of C. Transfer of Development Rights Program (immediately below R-311): “Rural Area properties should not serve as receiving sites for any TDRs.”</i> [this would probably necessitate changes to other PRD sections, most notably, CHAPTER 8--TRANSPORTATION]</p> <p>4. R-315b Earlier we submitted the following RECOMMENDATION, which we request be reconsidered for inclusion: RECOMMENDATION: <i>Add a second sentence to R-315 b. as follows: “Maps showing all TDR-banked properties--both sending and receiving sites--shall be updated semiannually and made available to the Public.”</i></p> <p>5. R-317 We do not believe our earlier QUESTIONS were answered: QUESTIONS: <ol style="list-style-type: none"> 1. <i>How is R-317 consistent with R-309 above?</i> 2. <i>What about Rural Area receiving sites--there is no mention?</i> 3. <i>What about Rural Forest Focus Areas--there is no mention--how many TDRs are required?</i> </p> <p>6. R-326c Earlier we submitted the following RECOMMENDATION, which we request be reconsidered for inclusion: RECOMMENDATION: <i>Add item “d” as follows: “New stormwater facilities primarily</i></p>	<p>This paragraph shows a range of options and is beneficial for future consideration; language retained.</p> <p>See previous answers in GMVUAC – Multiple Topics above.</p>

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<p><i>servicing urban needs shall be located within the UGA.</i></p> <p>There appears there was an attempt to address this in CHAPTER 9, F-230, by adding a new subsection: <i>“i. To the extent allowable under the Growth Management Act, the locational criteria in policy R-326.”</i> However, the problem actually stems from King County Code. We are on record recommending a change to: KCC 21A.08.060 A. Government/business services land uses. under “Specific Land Use” – “Utility Facility” by adding a Note #38 as a Development Condition to all Zoning Designations:</p> <p><i>Note #38: Utility Facilities consisting of regional surface water flow control and water quality facilities that are proposed to be wholly located within a Resource or Rural-designated area and associated in whole or in part with an existing or new proposed private residential development that is located wholly within an Urban-designated area are prohibited. Where such conditions are proposed for a new facility or where substantial facility or service area modifications to an existing regional surface water flow control and water quality facility are proposed, the requirements under Note #8 shall apply to Utility Facilities.</i></p> <p>7. R-512 We do not believe our earlier QUESTION was answered: <i>QUESTION: How is this consistent with the proposed “Demonstration Project” at Pacific Raceways? If the land is in the Rural Area and not zoned “Industrial,” then this policy should preclude consideration of such a “Demonstration Project.”</i></p> <p>8. P. 3-50: <i>“The Parks and Water and Land Resources Divisions will also continue to develop opportunities for volunteers to plant native trees and shrubs and remove invasive species from County-owned lands and have established an ambitious goal for the planting of new trees in the county.”</i> <i>QUESTION: Was the intent to place a number between the words “of” and “trees” at the end of the sentence?</i></p> <p>9. R-687 Earlier we submitted the following RECOMMENDATION, which we request be reconsidered for inclusion: <i>RECOMMENDATION: Add a 4th sentence to read: “Mapping also should identify abandoned mine-shafts to ensure safety for subsequent land uses.”</i></p> <p>10. “Natural Resource Lands” Comments forthcoming on January 5, 2016.</p>	

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<p>CHAPTER 4—HOUSING AND HUMAN SERVICES (No review)</p> <p>CHAPTER 5—ENVIRONMENT</p> <ol style="list-style-type: none"> E-203 (GHG impacts): Still has a typo: “publicallylypublicly” [Note: the addition to E-204 uses the correct spelling]. E-215 (GHG & SEPA review): Our QUESTION on the Executive Order was not answered: <u>QUESTION: Has the County Council passed any such Ordinances?</u> <p>CHAPTER 6—SHORELINE MASTER PROGRAM (No review)</p> <p>CHAPTER 7—PARKS, OPEN SPACE, & CULTURAL RESOURCES</p> <ol style="list-style-type: none"> P-118a (Backcountry trails; was P-108): Our <u>CONCERNS/QUESTIONS</u> regarding access to Taylor Mountain Park were not addressed: <u>QUESTION: Will King County Parks work with the City of Seattle Public Utility Department to ensure the SE 208th St access to Taylor Mountain Park via the Seattle Watershed will remain open to the Public for hiking and horseback riding? There also is a large off-road parking area at stake here, again, all on the Seattle Watershed property.</u> P-124 (Trades for Open Space lands): Our CONCERN regarding allowing the siting and approval of urban or largely urban-serving facilities in Unincorporated or Rural Areas as a tradeoff to secure additional Open Space and/or Trail Connections was not addressed: <u>RECOMMENDATION: Add a third sentence to P-124 as follows: “Open Space and/or Trail Connections land trade agreements should not allow siting and approval of urban or largely urban-serving facilities in Unincorporated or Rural Areas.”</u> [Example: In early 2014, a Development Agreement between King County and YarrowBay concerning the Reserves at Woodlands just west of the City of Black Diamond permitted, in exchange for Open Space and some trail connections, an “urban-serving facility”--a massive Stormwater Retention “Lake” (~20-ac in size with a 40-ac footprint)--to serve (and help enable) the adjacent YarrowBay Master-Planned Developments wholly contained within the City of Black Diamond.] <p>CHAPTER 8—TRANSPORTATION</p> <ol style="list-style-type: none"> T-102: Our <u>CONCERNS/RECOMMENDATIONS</u> regarding establishing County road “networks” to help alleviate the long-term County transportation funding shortfall were not addressed in the PRD, 	

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<p>consequently, we resubmit the following:</p> <p><i>CONCERN:</i> <i>Regional policies should explore the establishment of County road “networks,” which know no jurisdictional boundaries (similar to State roads), funded by all County taxpayers.</i></p> <p><i>RECOMMENDATION:</i> <i>A second sentence should be added to T-102: “King County should explore establishing county-wide “road networks,” which know no jurisdictional boundaries, or a Transportation Benefit District, both funded by all County taxpayers.”</i></p> <p>2. T-208: Our CONCERNS/RECOMMENDATIONS regarding establishing County road “networks” were not addressed in Policy statements. Although, they were described very well in the text on p. 8-16, we strongly recommend Policies are needed that address this major problem. Consequently, we resubmit the following:</p> <p><i>CONCERN:</i> <i>Such “rural regional corridors,” so designated “to accommodate levels of traffic between urban areas,” cannot be sustainably funded simply by Rural Area property taxes. T-208 simply provides a means of identifying such “corridors,” but provides no solutions.</i></p> <p><i>RECOMMENDATIONS:</i> <i>Besides RECOMMENDATIONS given under T-102 above, to begin to address the Rural road usage/funding imbalance problem State laws (RCWs 36.78, 46.68,120-124, & 84.52) could be reviewed for opportunities to enable a more transportation-sustainable allocation of gas tax monies and provide more flexibility in revenues used. Working with the State, some mechanism should be developed, along with incentives, for cities to share revenues with Counties, possibly tied to growth that occurs in the absence of job opportunities. Policies should explore the Puget Sound Regional Council’s (PSRC’s) Transportation 2040 user-pays model by providing authority for usage charges, such as tolling key roads and methods to implement such strategies.</i></p> <p>3. T-224: We wholly concur with Docket Item #15 to eliminate T-224 as TDRs should not be used to satisfy Concurrency testing anywhere within the Rural Area. Concurrency is a tool used to ensure infrastructure keeps up with development. The use of TDRs to satisfy Concurrency testing does nothing to help reach that goal and, in fact, can hinder reaching that goal. Consequently, we resubmit the following:</p> <p><i>RECOMMENDATION:</i> <i>Add a new Policy under Concurrency to address the item the KC Council added to “Scope of Work” as follows:</i></p> <p><i>T-xxx</i> <i>When conducting concurrency testing, King County shall collaborate with other</i></p>	

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<p><i>jurisdictions to ensure infrastructure improvement strategies help prevent travel shed failure caused by unfunded city and state projects and traffic generated outside the unincorporated area.</i></p> <p>4. <u>P. 8-27: IV. Financing Services and Facilities that Meet Local and Regional Goals/B. Road- Services Policies and Priorities.</u> The opening text in this section has been changed. The Strategic Plan for Road Services lays out the priorities for the Road Services Division funding decisions. The 5th (lowest) priority is stated as: “Address roadway capacity when necessary to support growth targets in the urban area.” We strongly oppose this language (BTW, the old language simply was: “Capacity improvements.”) and recommend the following as the 5th priority: <i>RECOMMENDATION: On p. 8-27, first paragraph, change the 5th priority for the SPRS for RSD to read: “Address roadway capacity.”</i></p> <p>Rural Area taxpayers should <u>not</u> be providing diminishing tax monies any more than they already are to enhance or expand urban-to-urban travel corridors.</p> <p>5. <u>P. 8-36: IV. Financing Services and Facilities that Meet Local and Regional Goals/ B. Road- Related Funding Capabilities.</u> King County must adopt a long-term vision that recognizes the reality of long-term road revenue shortfalls and act proactively to avoid decreases in future funding levels. Policies herein should be based on such realities in order to be successful. Consequently, we recommend the following : <i>RECOMMENDATION: On p. 8-36, first paragraph, make the following changes: “King County receives road revenues from a variety of sources, including a dedicated unincorporated King County property tax, federal and state grants, gas tax, local taxes and road mitigation payments from private developments. The dedicated property tax and gas tax provide the largest portion of funding for the Road Services Division (71% in 2014). The property tax is tied to the assessed value of properties in unincorporated King County.” While property values in recent years since the 2007-2008 recession have been increasing in King County, Statewide voters have approved placing a 1% cap on annual property tax increases, effectively limiting funding available for Roads. Fuel-efficient vehicles have cut down the amount of funding available from gas taxes and the trend toward fuel-efficient cars will continue. Annexations will continue, or, at minimum, remain the same. Without a major revision to our statewide tax code or the State gas tax jurisdictional distribution formula being modified to reflect the reality that</i></p>	

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<p><i>many County roads are used by Urban commuters, it is highly predictable that the tax base for Roads funding will never return to pre-recession values in real terms. During the recession, property values in unincorporated King County dropped sharply. While the economy has shown signs of recovery, it will be years before the tax base for roads funding returns to pre-recession values in real terms. Gas tax revenues have been flat, in part because of vehicles that are more fuel efficient, lower sales of gas due to the economic conditions and a decline in the allocation to King County due to reduction in road miles from recent annexations.”</i></p> <p>CHAPTER 9—SERVICES, FACILITIES, & UTILITIES</p> <p>1. F-224 Earlier we submitted the following RECOMMENDATION, which we request be reconsidered for inclusion (similar to comment provided on Ch. 2, Sec. II, U-207) Bonded Debt: State law (RCWs 35.13.110; 35.13.270, and 35A.14.801) is rigid here.):</p> <p><i>RECOMMENDATION: Revisit State law (RCWs 35.13.110; 35.13.270, and 35A.14.801) so that Counties and Cities have the opportunity to “negotiate” any transfer of bonded debt incurred within the annexed area. Approval of County bonded debt could be similar to how cities do so upon annexation by offering a vote to the annexing residents and allow the county to require a disapproval of the annexation should residents vote against the bonded debt continuance.</i></p> <p>2. F-230 Please see RECOMMENDATION under R-326c above.</p> <p>NEW.F-240. <i>“King County shall require any new or expanding Group B water system to have a totalizing source meter and make information from the meter available upon request of King County.”</i></p> <p><i>RECOMMENDATION: Strike in its entirety. Our Rationale: Citizen Surveys we have conducted and published over the past decade continually indicate people do not want their wells metered.</i></p> <p>3. F-274 Earlier we submitted the following RECOMMENDATION, which we request be reconsidered for inclusion:</p> <p><i>RECOMMENDATION: Add a 4th sentence to F-274 to read: “New stormwater facilities primarily serving urban residents shall be located within the UGA.”</i></p>	<p>One of the ways the County can ensure lawful use of water by a Group B under the ground water permit exemption of RCW 90.44.050 is to require the metering. This policy should be retained.</p> <p>Addressed previously.</p>
<p>CHAPTER 10--ECONOMIC DEVELOPMENT</p> <p>1. I. Overview / B. General Economic Development Policies</p> <p>“King County partners with businesses, economic development organizations, and other</p>	<p>NOTE: Some of these comments were not include in the previous Greater Maple Valley UAC letters and</p>

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<p>jurisdictions in efforts to grow the economy to ensure the elements for a prosperous and successful economy are provided. The county also provides infrastructure, business, and workforce development products and services as part of its regional responsibilities; and it makes many other contributions to sustain the quality of life that makes the region a desirable place to live and work.”</p> <p><i>CONCERN: The County does not have in place an Economic Development Organization that can coordinate, execute, and implement policies and deploy resources herein.</i></p> <p><i>CONCERN: It appears this Chapter ignores research and development activities, patentees, individuals with granted Federal exclusive rights, etc.</i></p> <p><i>QUESTION: What happened to section A?</i></p> <p>2. ED-107 “At the multicounty level, King County should partner with other counties, regional entities and the state, as appropriate, to devise and implement economic development policies, programs and strategies to provide for sustainable and equitable growth throughout the Puget Sound region.”</p> <p><i>RECOMMENDATION: Add “Federal government” after “and the state.”</i></p> <p>3. ED-202 “King County shall emphasize continued support for the aerospace and information technology industrial clusters as well as industrial clusters offering the best opportunities for business development, job creation, and economic growth including those identified in the Puget Sound Regional Council’s Regional Economic Strategy for urban areas and the King County Rural Economic Strategies for rural areas (including resource lands).”</p> <p><i>RECOMMENDATION: Add “, maritime” between “aerospace” and “and information technology industrial clusters...”</i></p> <p><i>RECOMMENDATION: Add “(e.g., transportation equipment, such as truck, rail, marine, etc.)” after “as well as industrial clusters....”</i></p> <p><i>RECOMMENDATION: Add “and home-based businesses” within parenthetical expression “(including resource lands).”</i></p> <p>4. ED-206 “King County shall promote and help position small and midsize businesses to gain greater participation in the supply chains of large companies and the military located in the region.”</p> <p><i>RECOMMENDATION: Add “start-up,” after “help position small...”</i></p> <p><i>RECOMMENDATION: Add “, government,” after “large companies...”</i></p> <p>5. ED-211b “King County shall coordinate with a broad range of partners, organizations, businesses and public sector agencies to support the development of business innovation districts and related programming in lower income communities, with an emphasis on food innovation</p>	<p>are responded to below.</p> <p>While the County no longer has a fully staff economic development team, it continues to participate in a variety of regional forums related to economic development.</p> <p>Section A was deleted to streamline the overall length of the document.</p> <p>Comments addressed in previous Greater Maple Valley UAC Comment Letter.</p> <p>Since the policy reference the work of the PSRC, it is not revised and the recognition of multiple clusters is left within the PSRC's regional economic strategy process.</p> <p>Other policies reference start-up companies.</p>

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<p>districts, in particular. Food innovation districts may encompass anchor food businesses, small food business incubation, food industry education and training, markets and food hubs, food programs and partnerships with urban and rural food growers and cooperatives, and food aggregation and processing.”</p> <p>RECOMMENDATION: Add after “food aggregation and processing” the following: “including related support equipment.”</p> <p>QUESTION: Why are there two sets of Policies ED-211a and ED-211b?</p> <p>6. ED-402 “King County will support programs and partnerships to facilitate the efficient movement of freight to promote global competitiveness for business and industry.”</p> <p>RECOMMENDATION: Add “people and” after “efficient movement of...”</p> <p>7. ED-403 “King County shall partner, where feasible, with jurisdictions and other stakeholders to develop subarea economic development strategies to promote development and redevelopment in areas that can accommodate growth.”</p> <p>QUESTION: How are “areas that can accommodate growth” determined?</p> <p>8. VI. The Rural Economy</p> <p>CONCERN: This entire section should include both aquaculture and fisheries.</p> <p>9. ED-602 c. “King County recognizes the importance of the equestrian cluster for its diversity of business and recreation related operations which combine to provide jobs and income opportunities within the rural economy. The county will continue to work with equestrian related organizations on business and recreation aspects of the equestrian cluster and with organizations that represent the various trail and user groups to help ensure the continued viability and economic health of equestrian and related recreation businesses.”</p> <p>RECOMMENDATION: Add “open-land (e.g., equestrian dressage)” after “various trail...”</p> <p>CHAPTER 11—COMMUNITY SERVICE AREA PLANNING (No comments)</p> <p>CHAPTER 12—IMPLEMENTATION</p> <p>1. I-203 Item b. appears to eliminate our past and ongoing concerns related to the proposed Reserve Silica Demonstration Project. We <u>strongly</u> support such a change.</p> <p>Attachment—AREA ZONING STUDIES</p> <p>1. Cedar Hills/Maple Valley--Future Subarea Plan: The greater community (unincorporated area</p>	<p>Each of the policies address different topics.</p> <p>Movement of people is addressed in multiple other topics.</p> <p>The County determines this through its long-range and short-range planning activities.</p> <p>Request is too specific for this policy and is left to programmatic activities of the department.</p> <p>Comments noted; thank you for supporting this change.</p> <p>A broad solicitation for involvement will be included in each of the CSA</p>

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<p>councils, community organizations, rural residents, and rural business owners, including forest and farm owners, and rural communities, towns, and cities) must be involved with such Subarea planning, not just the owners of the twelve specific properties identified. Future changes in this subarea could have major impacts on the quality of life of surrounding residences and greatly increase traffic on Cedar Grove Rd, Lake Francis Rd, and SR-169. In addition, the Public should be provided with and fully aware of the formal process the County uses to define Subarea Plans.</p>	<p>Plans. Chapter 11 broadly defines the new subarea planning programs; specific components are available through the Dept. of Permitting and Environmental Review.</p>
<p>Attachment—CODE CHANGES</p> <p>1. Amendments Related to Proposed Comprehensive Plan Policy Changes TITLE 14. ROADS AND BRIDGES Transportation Concurrency: Modify KCC 14.70, Transportation Concurrency Management, to revise testing methodology consistent with the comprehensive plan update. <u>QUESTION: “What changes are proposed in the Concurrency Testing Methodology under KCC 14.70?”</u></p> <p>2. To address the RECOMMENDATIONS we have made under Policies R-326c and F-224, we recommend a change to King County Code: KCC 21A.08.060 A. Government/business services land uses. under “Specific Land Use” – “Utility Facility” by adding a <u>Note #38</u> as a Development Condition to all Zoning Designations.</p> <p>Technical Appendix A—CAPITAL FACILITIES (No review.)</p> <p>Technical Appendix C1—TNR & ARTERIAL CLASSIFICATION CHANGES</p> <p>1. We have several overall QUESTIONS related to the TNR: <u>QUESTION: How is the TNR developed?</u> <u>QUESTION: Are TNR needs prioritized and, if so, how?</u> <u>QUESTION: Is the Public involved in the TNR development process?</u> <u>QUESTION: Is the KCCP Update the only opportunity available to the Public to provide TNR Comment?</u></p> <p>2. Pp. 4-5: In Chapter 1: Planning Context and Introduction it states the following: <i>“Development Review: The TNR serves as a source of information in the review of proposed land developments and in determining appropriate mitigation measures required as a condition of new development approval. The County’s Mitigation Payment System (MPS) uses the TNR to help identify growth-related projects for the impact fee system, however given the lack of funding for capacity improvements; the MPS system is undergoing a major overhaul.”</i> <u>QUESTION: What aspects of the MPS are being changed? When will those changes be</u></p>	<p>This was included in error in the public review draft. Code changes to revise concurrency testing methodology will not be included with the comprehensive plan transmittal. In a separate effort, a consultant will be retained to assist in updating the County's transportation concurrency methodology.</p> <p>These issues are addressed in the TNR attachment to the Executive Proposed plan.</p> <p>The public is involved in the TNR through the Comprehensive Plan update process, including the docket process. In addition, the information used by the Road Services Division to develop the TNR may include capital needs previously identified by the public in various communications with the agency.</p> <p>No policy changes to the MPS are</p>

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<p><i>available for Public review?</i></p> <p>Technical Appendix C2—REGIONAL TRAILS NEEDS REPORT (No comments)</p>	<p>being proposed in the comprehensive plan update. The MPS program will be assessed at a later date. This has been reflected in edited TNR text.</p>

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STEVE HEISTER – GREATER MAPLE VALLEY UAC – LETTER TO THE EDITOR OF SEATTLE TIMES	
COMMENT	RESPONSES
<p><i>From: Peter Rimbos [mailto:primbos@comcast.net]</i> <i>Sent: Tuesday, January 05, 2016 8:47 AM</i></p> <p>The letter was approved unanimously by our full GMVUAC at our Monday, January 4, meeting. As a result, it was signed by Steve, as Chair, and I [<i>Peter Rimbos</i>] was authorized, as our Corresponding Secretary, to officially submit it to the Seattle Times and other interested parties such as yourself, other UACs, etc.</p> <p>Thus, it represents official GMVUAC policy and we would be happy if you could include with our other KCCP Update PRD comments, as it certainly is pertinent to the update and completely consistent with our other comments and our GMVUAC mission.</p> <p>NOTE: The following letter was submitted to the Seattle Times in response to a January 2, 2016 editorial entitled: Reject change of King County's urban-growth boundary.</p> <p>http://www.seattletimes.com/opinion/editorials/reject-change-of-king-countys-urban-growth-boundary/</p>	<p>Comments noted. King County appreciates the support for retaining the Urban Growth Area boundary.</p>

STEVE HEISTER – GREATER MAPLE VALLEY UAC – LETTER TO THE EDITOR OF SEATTLE TIMES	
COMMENT	RESPONSES
<p>Editor,</p> <p>The Times is to be commended for addressing one of most important quality of life issues facing us today and into the future (“Reject change of King County’s urban-growth boundary,” January 3, 2016)</p> <p>The Greater Maple Valley Unincorporated Area Council (GMVUAC) has been diligently working for nearly 40 years to “keep the Rural Area rural.” Since the 1990 passage of the nationally acclaimed Growth Management Act, there has been continual pressure exerted along the Urban-Growth Boundary fringe.</p> <p>As your editorial rightly states, the quality of life that attracts and helps King County retain so many good, thriving businesses, along with so many well-educated people, is built on the foundation of the Growth Management Act and the integrity of the Urban-Growth Boundary.</p> <p>Endless sprawl hurts everyone. It reduces our quality of life. It causes the need for endless roads to be built and maintained. It requires further extension of expensive infrastructure, such as sewers and water mains. It requires more schools to be built. Endless sprawl would result in a much larger tax burden on both people and businesses. Who wins? Developers, builders, and realtors--the very same who are exerting pressure on the Urban-Growth Boundary. Who loses? Everyone else.</p> <p>The fight to keep urban-serving facilities within the Urban-Growth Boundary continues. Clearly, the vast majority of the people on both sides of the Urban-Growth Boundary want to keep urban facilities within urban communities and out of rural areas. The people we serve in the greater Maple Valley area continually implore us to maintain the integrity of the Urban-Growth Boundary.</p> <p>Finally, we concur with the Times editorial when it states there is plenty of room for population growth within the Urban-Growth Boundary. The Puget Sound Regional Council, along with the Countywide Planning Policies, and the Comprehensive Plans of King County and its cities, all project and review growth patterns in a methodical way which is well documented. We work with King County on its Comprehensive Plan to ensure citizen voices are heard. All of us are very fortunate such thoughtful and well-informed planning is done to ensure a good quality of life for us and our children.</p> <p>Steve Hiester, Chair, GMVUAC</p>	

LINDSAY HOFMAN – VASHON ISLAND DENSITY AND WATER AVAILABILITY	
COMMENT	RESPONSES
<p><i>Vashon-Maury Island Community Meeting Comment Card</i></p> <p>I have understood that our zoning of the island was determined by what density could be served by the water available. How could we increase density in the face of predictions of a drier climate?</p>	<p>Thank you for your comment. Rural densities comport with rural water resources given the majority of rural water is provided for by dispersed, low density, low volume ground water wells in the surficial aquifers, aquifers charged by the winter rains. In rural areas of the County without adequate groundwater resources, the water supply is generally imported from a regional supplier.</p>

MARK HOFMAN (CITY OF SNOQUALMIE) — SNOQUALMIE INTERCHANGE AREA ZONING STUDY

COMMENT

From: Mark Hofman [mailto:mhofman@ci.snoqualmie.wa.us]

Sent: Wednesday, January 06, 2016 4:16 PM



OFFICE OF THE CITY ATTORNEY
Bob C. Sterbank
38624 SE River Street
PO Box 967
Snoqualmie, WA 98065
Office: 425-831-1888
Cell: 425-890-0232
Fax: 425-831-6041
www.ci.snoqualmie.wa.us
bsterbank@ci.snoqualmie.wa.us

January 6, 2016

The Honorable Dow Constantine, Executive
King County Chinook Building
401 5th Avenue, Suite 800
Seattle, WA 98104

Re: Public Review Draft, 2016 Comprehensive Plan

Dear Executive Constantine:

I write at the request of Mayor Matthew R. Larson, to convey the City of Snoqualmie's comments concerning the Public Review Draft of the 2016 King County Comprehensive Plan.

The Public Review Draft wrongly fails to include the City's and the County Council Scoping Motion's proposal to modestly adjust the UGA boundary by adding approximately 90 acres of property along both sides of Snoqualmie Parkway and adjacent to the I-90/SR 18 interchange ("the Snoqualmie Interchange"). The so-called "Area Zoning Studies" prepared in response to the docket request and scoping motion both give short shrift to the UGA proposal, and fail to consider how basic adjustments to the County's CPPs and Comp Plan policies could be made to allow approval of the proposal. Further, the Public Review Draft proposes inappropriate and/or illegal adjustments to the text of Comp Plan policies. These changes, if implemented, would inappropriately further cement a UGA boundary-setting process, in complete disregard of the text of the GMA as recently interpreted by Judge Tabor in ongoing litigation in *City of Snoqualmie v. Central Puget Sound Growth Management Hearings Board*, Thurston County Superior Court Cause No. 13-2-01841-9.

For these reasons, as explained in more detail below, the City respectfully requests that the Executive direct his staff to review and revise the draft Comp Plan, as outlined below, prior to the Comp Plan's transmittal to the King County Council in March, 2016.

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Comments noted. The edits to the Comprehensive Plan are consistent with the December 4, 2015 ruling, which address the multiple issues raised in this letter:

CITY OF SNOQUALMIE,
Petitioner,
vs.
CENTRAL PUGET SOUND
GROWTH MANAGEMENT
HEARINGS BOARD and KING
COUNTY
Respondents

SUPERIOR COURT NO.
13-2-01841-9

MARK HOFMAN (CITY OF SNOQUALMIE) – SNOQUALMIE INTERCHANGE AREA ZONING STUDY

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- **Adding the Snoqualmie Interchange Parcels to the UGA Is Consistent With Substantive Existing and Proposed King County Comp Plan Policies.**

Addition of the Snoqualmie interchange parcels into the UGA, and allowing for institutional and commercial uses in Snoqualmie to support the significant residential growth on Snoqualmie Ridge, is consistent with multiple King County adopted and/or proposed Comp Plan policies that are not addressed in the County's Area Zoning Studies.

First, King County's Comp Plan calls for the County to work with the city to "provide a high quality of life for its residents" "to develop attractive, safe and accessible urban communities," "support economic development," to "strive to balance the differing needs" identified in the City of Snoqualmie's Comprehensive Plan, and to "strengthen communities by addressing all the elements, resources and needs that make a community whole, including: economic growth and the built environment . . ." See proposed RP-101, 104 and 110. Adding the Snoqualmie interchange parcels into the UGA, so that they can be developed with commercial/institutional uses to support Snoqualmie's residential growth, is consistent with all of these policies.

The Public Review Draft Comp Plan also calls for the County to "reduce per capita greenhouse gas emissions," (Draft at 1-15; also 1-25), and states that "King County shall incorporate approaches to reduce greenhouse gas emissions and prepare for the impacts of climate change into its land use and transportation planning and economic development efforts. . . ." RP-112. Adding the Snoqualmie Interchange parcels into the UGA will:

- reduce vehicle miles traveled by Snoqualmie residents
- reduce greenhouse gas emissions, and
- reduce traffic congestion.

These results are consistent with the GMA and the Public Review Draft's proposed text and policies that call for a reduction of VMT, reduction of greenhouse gas emissions, and avoidance of unnecessary traffic congestion. See Draft at 5-18 – 5-19; 5-23 – 5-24; and policies E-210 – E-214.

- **Adding the Interchange Parcels to the UGA Is Consistent With the City of Snoqualmie's Comp Plan Policies.**

The City's Comp Plan vision is based on a "Livable and Complete Community," where our citizens can live, work, socialize, and recreate, but that is also sustainable and that reduces greenhouse gas emissions. The City's Comp Plan also contains specific policies advocating adjustment of the UGA boundary to allow for development at the interchange to serve the needs of City residents. See Snoqualmie Vision 2032 at Vision and Policy Plan p. 1-21, Policies 7.1.2 – 7.1.5

MARK HOFMAN (CITY OF SNOQUALMIE) – SNOQUALMIE INTERCHANGE AREA ZONING STUDY

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- **Keeping the Snoqualmie Interchange Parcel's Zoning as "Rural" Is Not Consistent With King County's Rural Comp Plan Policies.**

The site's current condition and developments in the vicinity make the current rural zoning inconsistent with King County Comp Plan Rural policies:

The properties have been extensively logged, and the logged portion of the parcels were essentially clear-cut. The only remaining vegetation on the parcels is contained in non-logged "buffer" areas. This is true both of the Puget Western parcels on the east side and the Griffith parcels on the west side of Snoqualmie Parkway. Photos submitted at the April 29, 2015 County Council TrEE Committee meeting, and that are in the litigation record of *Snoqualmie v. Growth Board*, graphically illustrate this. While some previous correspondence to the County contended that the adding the Snoqualmie Interchange parcels would "reduce forest cover in the basin," the photographs demonstrate that the forest cover has already been removed, pursuant to permits granted by King County.

The properties' owners are preparing them for development. Puget Western, Inc., the owner of approximately 51 acres on the east side of the Parkway, is the development arm for PSE. Puget Western's stated mission is "is to maximize the value of real estate assets and other assets through active management, development and timely disposition." <http://www.pugetwestern.com/aboutus.asp>. PWI is actively marketing its lots for development. http://www.pugetwestern.com/docs/project_portfolio/Echo_Lake_Site.pdf. King County Public Hospital District No. 4 is using its 20.85 acres, also on the east side of the Parkway, as the Hospital's administrative offices. The Hospital District plans to continue and expand that use. See attached Declaration of Rodger McCollum.

The Public Review Draft Comp Plan contains rural policies, but the Snoqualmie Interchange parcels – which border the compact, developed Snoqualmie Ridge neighborhood, the busiest freeway in the State (I-90) and Snoqualmie Parkway do not fit the characteristics by which the rural policies define "rural" lands.

For example, proposed King County Comp Plan Policy R-201 calls for the County to protect and enhance the following attributes associated with the rural lifestyle and the Rural Area:

- The natural environment, aquifers used for potable water, surface water bodies including Puget Sound and natural drainage systems and their riparian corridors;
- Farming, forestry, fisheries, mining, home-based businesses and cottage industries;
- Historic resources, historical resources and continuity important to local communities, as well as archaeological and cultural sites important to tribes;

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- Community small-town atmosphere, and locally owned small businesses;
- Rural Towns and Rural Neighborhood Commercial Centers with clearly defined identities compatible with adjacent rural, agricultural, forestry and mining uses;
- Regionally significant parks, trails and open space;
- A variety of low-density housing choices compatible with adjacent farming, forestry and mining and not needing urban facilities and services;
- Traditional rural land uses of a size and scale that blend with historic rural development; and
- Rural uses that do not include urban or largely urban-serving facilities.

The Snoqualmie Interchange parcels do not possess any of the above characteristics.

Similarly, proposed King County Comp Plan Policy R-202 indicates that a rural designation protects “areas that are rural in character and meet one or more of the following criteria:

- Opportunities exist for significant commercial or noncommercial farming and forestry (large-scale farms and forest lands are designated as Resource Lands);
- The area will help buffer nearby Natural Resource Lands from conflicting urban uses;
- The area is contiguous to other lands in the Rural Area, Resource Lands or large, predominantly environmentally critical areas;
- There are major physical barriers to providing urban services at reasonable cost, or such areas will help foster more logical boundaries for urban public services and infrastructure;
- The area is not needed for the foreseeable future that is well beyond the 20-year forecast period to provide capacity for population or employment growth;
- The area has outstanding scenic, historic, environmental, resource or aesthetic values that can best be protected by a Rural Area designation; or

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- Significant environmental constraints make the area generally unsuitable for intensive urban development.

Again, the Snoqualmie Interchange parcels do not meet the above criteria.

Given the foregoing, keeping the Snoqualmie Interchange parcels “rural” – which is the effect of denying addition of the Interchange parcels to the UGA – does not advance any of the County’s own planning goals for the Rural Area.

- **Snoqualmie’s Existing Environmentally Critical Areas Regulations Will Protect Any Environmentally Critical Areas on the Site.**

To the extent that there are environmentally critical areas on the site (e.g., steep slopes, wetlands, or streams), the City has GMA-compliant environmentally critical areas. These provisions, codified at Chapter 19.12 of the Snoqualmie Municipal Code, will protect any environmentally critical areas on the Snoqualmie Interchange parcels.

- **The Lawsuit Over King County’s 2012 Comp Plan Amendments Could Require King County To Address Commercial, Institutional and Nonresidential Needs On a City-By-City Basis Throughout the County.**

The City of Snoqualmie challenged King County’s 2012 Comp Plan Amendments on the grounds that RCW 36.70A.110(2) required King County to analyze whether the City of Snoqualmie “include[s] areas sufficient to accommodate the broad range of needs and uses that will accompany the projected urban growth including, as appropriate, medical, governmental, institutional, commercial, service, retail, and other nonresidential uses.”

The City’s lawsuit remains pending. At a recent hearing on the merits, the Honorable Thurston County Superior Court Judge Gary Tabor ruled that the 2009 amendments to RCW 36.70A.110(2) broadened the scope of what the County must take into account when considering a UGA boundary change. Judge Tabor rejected the argument that the statute requires that commercial and institutional uses be considered only with a city’s corporate boundaries, but that a county must consider a city’s need for commercial and institutional uses *outside* of that city, on a city-by city basis. Judge Tabor also ruled that a county may not override the wishes of a city seeking a UGA change without some process, and that, instead, a collaborative planning process involving give and take between a county and city is required.

In light of Judge Tabor’s ruling, the Public Review Draft’s proposed references in U-102 and U-115 to “countywide” rather than city-by-city calculations of commercial, institutional, and other non-residential growth are erroneous and inconsistent with the Growth Management Act, specifically, RCW 36.70A.110(2).

MARK HOFMAN (CITY OF SNOQUALMIE) – SNOQUALMIE INTERCHANGE AREA ZONING STUDY

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Multiple layers of judicial review remain following the Superior Court’s decision: review by the Court of Appeals is available as of right, with subsequent discretionary review by the Supreme Court. In the end, if the City prevails, the County will be required to conduct this type of analysis not just in Snoqualmie, but in each city in King County every time a UGA boundary change is sought.

On the other hand, a revised Draft Comp Plan that incorporates an agreement with Snoqualmie on the Interchange parcels would provide a basis for resolution of the lawsuit, and avoid this possible outcome, all without adversely affecting the County’s other rural planning goals set forth above.

- **Important Highway Work At SR 18/I-90 Will Also Affect the Snoqualmie Interchange Parcels**

Further underscoring the changing and non-pristine nature of the parcels at issue, an important project needed to address traffic congestion on I-90 and SR 18 was funded in the 2015 State Legislative budget. Both the County and City publicly supported the transportation package at the Legislature, which ultimately included \$150 million for flyover ramps at the SR 18/ I-90 improvements to address existing safety, traffic congestion and freight mobility deficits at the interchange. Construction of this project will itself involve significant development on one or more of the Snoqualmie Interchange parcels, further highlighting the inappropriateness of preserving the parcels’ rural zoning designations.

- **The Snoqualmie Interchange Parcels Can Be Developed In a Way That Mitigates Impacts to Views Along the Mountains to Sound Greenway.**

The Snoqualmie interchange can be developed in a way that also mitigates impacts to views along the Mountains to Sound Greenway. The City has previously submitted to the County Council’s TrEE Committee, and included in the litigation record of *Snoqualmie v. Growth Board*, various photographs of the Preston and North Bend interchanges, both of which have major commercial developments adjacent to them (Commercial development at the Preston Interchange was permitted by King County). Developments at both interchanges are also generally screened from view from I-90 by grade changes and/or vegetation. Impacts to the Mountains to Sound Greenway, if any, can be mitigated at the Snoqualmie Interchange in the same fashion as they have been mitigated at the Preston Interchange.

- **Allowing Snoqualmie Residents to Meet Their Commercial Needs Close to Home Is Fair.**

Addition of the Snoqualmie interchange parcels into the UGA, and development with nonresidential uses, is fair to Snoqualmie residents, who should be able to serve their needs close to home rather than driving 10 miles or more to nearby communities.

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And, the City is not pursuing a Walmart-style development, as was stated by one Council member during a previous TrEE Committee meeting. The City's adopted Comp Plan contains policies encouraging jobs with salaries matching housing costs, and zoning controls to limit lower wage jobs.

Conclusion

The foregoing points support inclusion of the Snoqualmie interchange in the scope of work for the 2016 amendments to the Comp Plan and related Countywide Planning Policies. The City of Snoqualmie urges the Executive to direct staff to review and revise the Area Zoning Studies, to include adjustment of the UGA boundary to include the Snoqualmie Interchange parcels, and to include minor amendments of Comp Plan policies and CPPs as necessary to accomplish this result.

Sincerely,

CITY OF SNOQUALMIE



Bob C. Sterbank, City Attorney

c: Darren Carnell
Jennifer Stacy

The County is interested in continuing to work with the City and the surrounding property owners under the existing land use framework.

LYNN HYERLE – MULTIPLE TOPICS	
COMMENT	RESPONSES
<p><i>From: Lynn Hyerle [mailto:lynn@nosprayzone.org]</i> <i>Sent: Wednesday, January 06, 2016 4:44 PM</i></p> <p>Thank you for the opportunity to comment on the King County 2016 Comprehensive Plan Draft. Here are my priorities for the future of King County:</p> <p>Make King County more affordable. People should be able to live close to where they work. Parts of our County are becoming less affordable, forcing more families to move farther away from where they work, leading to significant negative social, economic and environmental impacts. We need the Comprehensive Plan to support strategies that create greater affordability near key transit centers and employment centers. It should include more funding for affordable housing, and it should include policies that increase the supply of market rate, family size, and affordable units.</p> <p>Put growth in high opportunity locations with good transit service. With the expansion of light rail and bus rapid transit, we should implement an urban communities strategy, which will help the region grow efficiently and responsibly over the next twenty years. We need to have a strategy in place so that increased growth around transit centers does not lead to displacement of people and small businesses. We should have policies, programs and investments that help people and businesses stay in their neighborhoods if they choose.</p> <p>Keep investing in our transportation system with innovative, multi-modal strategies that will keep us moving affordably, safely and sustainably. As King County continues to grow, we must change the way that we move around or we will become mired in gridlock and increased greenhouse gas emissions. Smart, strategic use of our limited roadways will be required to keep King County moving as we add more people and jobs over the next 20 years. We need investments in bike lanes, transit and sidewalks to give people many ways to get around safely while protecting our air and our environment.</p> <p>King County must continue to be a leader in addressing climate change. We need aggressive, bold action to meet our climate goals. Our transportation, land use, capital facilities and environmental goals and policies should work together to protect our natural environment and to prevent climate change. We need to prepare for climate impacts and be sure to protect our most vulnerable residents who are most at risk.</p>	<p>Thank you for the comments regarding affordable housing. The 2016 Plan includes a new chapter on housing and human services; the policies therein have been strengthened to reflect the importance and challenges the region faces in meeting the housing need.</p> <p>The policies focus on placing growth in areas with good transit service. This means focusing growth within cities and centers and supporting transit oriented development.</p> <p>Comprehensive plan policies support multimodal transportation.</p> <p>Multiple chapters have been updated with policies related to Climate Change and reference the work of the Strategic Climate Action Plan and King County Cities Climate Collaboration (the K4-C).</p> <p>Policies related to landslide mapping and notification as well as emergency response have been updated and included in the 2016 Plan. The landslide policies were further refined,</p>

LYNN HYERLE – MULTIPLE TOPICS	
COMMENT	RESPONSES
<p>Protect our natural resource areas and our rural communities. King County is home to some of the most beautiful farmlands and forest lands. We need to protect these areas to ensure local food sources, wildlife habitat, clean water resources, and recreation.</p> <p>Better Protect People and Property From Natural Hazards. The Oso disaster has underscored the need to better protect people and property from landslides and other natural hazards. Recent research has shown that Oso scale landslides are more common than previously believed. Improve comprehensive plan policies and regulations to protect people and property from natural hazards.</p> <p>Work towards a more equitable future for all. Not all of our residents and communities have the same access to opportunity. The County should be proactive and intentional about advancing race and social justice through its policies, programs and investments.</p> <p>Accountability and measurement. Quantifiable goals will help us track how we are doing. We should expand our metrics and make sure that we are moving in the right direction. It is critical that our tracking and accountability not just focus on county-wide results, but also on specific populations so that no one is getting left behind.</p> <p>Thank you!</p>	<p>based on public comment, between the Public Review Draft and Executive Recommended Plan.</p> <p>Policies have been added and updated throughout the 2016 Plan related to equity and social justice; further, mapping data has been included to help explain the relationship of ESJ to the geographies of the Growth Management Act.</p> <p>Chapter 12 includes a new Workplan section that includes an Action to develop a Performance Measures Program that is specifically related to the goals, and timeframes, of the Comprehensive Plan.</p>

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MARGO JASUKAITIS (THE KELLER GROUP) – CARNATION AREA ZONING STUDY	
COMMENT	RESPONSES
<p><i>From: Margo Jasukaitis [mailto:Margo@thekellergroup.com]</i> <i>Sent: Wednesday, January 06, 2016 4:15 PM</i></p> <p>Attached is a letter voicing support for the 4:1 proposal for property in unincorporated King County purchased by Gary Remlinger, David Remlinger, David Hopkins and Vern Tillman. 78 King County residents signed the letter in support of the annexation of the three parcels in King County to the City of Carnation.</p> <p>Please don't hesitate to let us know if you have any questions or need more information.</p>	<p>Comments noted.</p>

MARGO JASUKAITIS (THE KELLER GROUP) – CARNATION AREA ZONING STUDY

COMMENT

RESPONSES

Carnation Fields

PO Box 177
Carnation, WA 98014

January 6, 2016

To King County Executive Dow Constantine:

We're writing in support of the Four to One Program proposal for the property in Unincorporated King County purchased by Gary Remlinger, David Remlinger, David Hopkins and Vern Tillman.

As lifelong residents of the Snoqualmie Valley, we see many advantages to moving forward with the project, which was brought before the King County Council in early December, 2015.

The undersigned support the annexation of parcels 152507-9005-03, 152507-9010-06, 152507-9049-01 in King County, WA to the City of Carnation. These parcels - Carnation Fields - are owned by Gary Remlinger, David Remlinger, Vern Tillman and David Hopkins. The property is 25 acres. Our vision for the land is to preserve 20 acres in the low-lying area as active farmland, while clustering homes on the five hillside acres. We intend to use the Four to One Program allowed under existing County Code.

The benefits of moving forward with this project include:

*Provision of homes to entice new residents to move here; the city needs more residents to support city services and its business district.

*The city already has sewer, water and infrastructure in place to support development on this parcel.

*By expanding the UGA, 4/5 of the property will be preserved, protected and owned by King County with no cost to the taxpayer.

*The farmable land can be leased for farming.

*The city will collect revenues of the development every year to support essential city services.

*Homeowners will have the opportunity to be adjacent to active farmland without having to be a farmer.

We believe this project will help ensure Carnation's long term health while honoring its tradition of active farming. We also want to create a space to share the area's traditions with a new generation in a way that would entice them to live, work and play here in the valley.

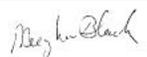
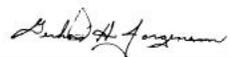
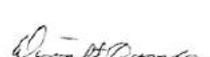
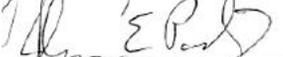
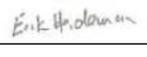
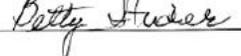
Respectfully,

Carnation Fields LLC

MARGO JASUKAITIS (THE KELLER GROUP) – CARNATION AREA ZONING STUDY

COMMENT

RESPONSES

	
Nicole Piorada	Michelle Kelly
	
Meghan Black	Mark G.
	
John Ross	Susan A. Ferguson
	
D. King	Sharon Zucchi
	
Taylor Adams	Amy M. Adams
	
Kevin Patuski	Colin Quade
	
Tom Hult	Fran E. Pardy
	
Bob	Rickon E. Gault
	
Cheryl A. Carlson	Darren D. Brink
	
Erik Holman	Paul D. Piquet
	
Jim MEEHAN	Erik Stender
	
Scott Schiller	Betty Huxler

MARGO JASUKAITIS (THE KELLER GROUP) – CARNATION AREA ZONING STUDY

COMMENT

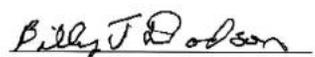
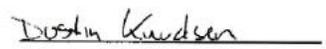
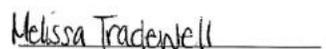
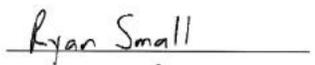
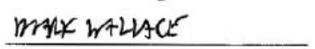
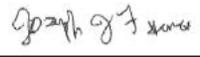
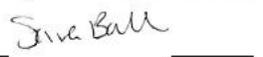
RESPONSES

<u>Rydzka Glenn</u>	<u>Janet Keller</u>
<u>Van Allen</u>	<u>Don Allen</u>
<u>Elizabeth Allen</u>	<u>Larry J. Bacon</u>
<u>Larry Downer</u>	<u>Barbara J. Green</u>
<u>Pete Truman</u>	<u>Suzanne Patten</u>
<u>Carlson Down</u>	<u>Chevy Paquette</u>
<u>Deis Golan</u>	<u>Don Golan</u>
<u>Wan Dwyer</u>	<u>James Cooper</u>
<u>W.D. Fu</u>	<u>David Remlinger</u>
<u>Brenden</u>	<u>A. J. Fu</u>
<u>Penelope Cook</u>	<u>Bonnie J. Dombing</u>
<u>James Richter</u>	<u>Wald R</u>
<u>Bonnie M. Richter</u>	<u>Mike Busch</u>

MARGO JASUKAITIS (THE KELLER GROUP) – CARNATION AREA ZONING STUDY

COMMENT

RESPONSES

	
Chris Day	
Lucy M Rusch	
	
	
	
	
Angel Lamar	
	
	
Alicia Taylor	
	

MARGO JASUKAITIS (THE KELLER GROUP) – CARNATION AREA ZONING STUDY		
COMMENT	RESPONSES	
<p style="text-align: center;">Addresses of Signees</p> <p>Sharon Quaale 5721 320th Ave NE Carnation, WA 98014</p> <p>Dwight Quaale 5721 320th Ave NE Carnation, WA 98014</p> <p>John Quaale 32527 NE 46th Pl. Carnation, WA 98014</p> <p>John Parkey 33105 NE 24th St. Carnation, WA 98014</p> <p>Ruben Cortez 3030 Fall City Carnation Rd NE Carnation, WA 98014</p> <p>Darren Burke 32609 NE 32nd St. Carnation, WA 98014</p> <p>Roger Paquette 32715 NE 32nd St. Carnation, WA 98014</p> <p>Trudie Glenn P.O. Box 817 Carnation, WA 98014</p> <p>Dan Tachell 2416 293rd Pl NE Carnation, WA 98014</p> <p>Peter Iversen 33320 NE 32nd St. Carnation, WA 98014</p>		

MARGO JASUKAITIS (THE KELLER GROUP) – CARNATION AREA ZONING STUDY

COMMENT

RESPONSES

Larry Doneen
32820 NE 24th
Carnation, WA 98014

Steve Keller
1931 W. Snoqualmie River Rd SE
Fall City, WA 98024

Carleen Doneen
32820 NE 24th
Carnation, WA 98014

Larry Green
11714 E Lake Joy Dr. NE
Carnation, WA 98014

Denis Gunderson
13520 322nd Ave NE
Duvall, WA 98019

Barbara Green
11714 E Lake Joy Dr. NE
Carnation, WA 98014

Karen Gunderson
13520 322nd Ave NE
Duvall, WA 98019

Susan Porter
P.O. Box 913
Carnation, WA 98014

William Hart
4625 Tolt River Road NE
Carnation, WA 98014

Cheryl Paquette
32715 NE 32nd St
Carnation, WA 98014

Jennifer Bandow
27520 SE 31st Place
Sammamish, WA

George Smith
P.O. Box 1164
Fall City, WA 98024

Rosalba Cortez
32608 NE 24th
Carnation, WA 98014

Betty Studer
2313 344th Ave NE
Carnation, WA 98014

James Richter
2610 Fall City Carnation Rd SE
Fall City, WA 98024

Eric Studer
2313 344th Ave NE
Carnation, WA 98014

Bonnie Richter
2610 Fall City Carnation Rd SE
Fall City, WA 98024

Jaimie Cortez
32608 NE 24th St.
Carnation, WA 98014

Janet Keller
1931 W. Snoqualmie River Rd SE
Fall City, WA 98024

David Remlinger
12525 Old Snohomish Monroe Rd
Monroe, WA 98290

MARGO JASUKAITIS (THE KELLER GROUP) – CARNATION AREA ZONING STUDY		
COMMENT	RESPONSES	
<p>B. Lawrence Carlson 2412 Neal Rd SE Fall City, WA 98024</p> <p>Cheryl A. Carlson 2412 Neal Rd SE Fall City, WA 98024</p> <p>Erik Heidenen 12321 218th Pl SE Snohomish, WA 98296</p> <p>Kim Meehan 218 Maple Ave #1 Snohomish, WA 98290</p> <p>Chris Day 2310 122nd St SW Everett, WA 98204</p> <p>Alicia Taylor 9417 NE 149th Ct. Apt 8102 Bothell, WA 98011</p> <p>Scott Schille 23708 107th Pl W Edmonds, WA 98020</p> <p>Angel Lamar 16708 Fremont Ave N Shoreline, WA 98133</p> <p>Steve Ball 9810 164th St. SE Snohomish, WA 98296</p> <p>Lee Keller 7900 W Snoqualmie Valley Road NE Carnation, WA 98014</p> <p>Maggie Tillman 10008 161st Pl NE Redmond, WA 98052</p> <p>Vern Tillman 10008 161st Pl NE Redmond, WA 98052</p> <p>Bill Dodson 9923 161 Ave Redmond, WA 98005</p> <p>Raleigh Knudsen 22215 Dome Donne Rd Maple Valley, WA 98038</p> <p>Dustin Knudsen 8215 384th Ave SE Snoqualmie WA 98065</p> <p>Melissa Tradewill 15016 Macadam Rd S #19 Tukwila, WA 98188</p> <p>Ryan Small 21329 6th Ave W Bothell, WA 98021</p> <p>Kirk McCoy 19129 74th Ave W Lynnwood, WA 98036</p> <p>Mark Wallace 10848 32 S.W. Seattle, WA 98146</p> <p>Tom Button 14455 59th Ave S Tukwila, WA 98168</p> <p>Mike Rusch 7900 W Snoqualmie Valley Road NE Carnation, WA 98014</p> <p>Lois Rusch 7900 W Snoqualmie Valley Road NE Carnation, WA 98014</p>		

MARGO JASUKAITIS (THE KELLER GROUP) – CARNATION AREA ZONING STUDY		
COMMENT	RESPONSES	
<p>Gary Remlinger 32610 NE 32nd St Carnation, WA 98014</p> <p>Bonnie Remlinger 32610 NE 32nd St Carnation, WA 98014</p> <p>Kerrie Ratusnindy P.O. Box 549 Carnation, WA 98014</p> <p>Tim Ratusnindy P.O. Box 549 Carnation, WA 98014</p> <p>Arnold Pretz 22121 W. Lake Kayak Dr. Monroe, WA 98272</p>		

DICK JONES – CARNATION AREA ZONING STUDY	
COMMENT	RESPONSES
<p><i>From: Dick Jones [mailto:dedwardjones5@gmail.com]</i> <i>Sent: Monday, January 04, 2016 10:20 AM</i></p> <p>Dear King County Executive Constantine,</p> <p>Attached you will find our letter of opposition to the annexing of farm properties listed in the letter.</p> <p>I trust you will find all the information needed to enable your staff to consider reaching out to myself and others potentially effected by the upcoming King County Comprehensive Plan 2016 Update of Implementing zoning changes.</p> <p>If you or your staff have any questions please contact me at either my email or my phone.</p>	<p>Comments noted.</p>

DICK JONES – CARNATION AREA ZONING STUDY		
COMMENT	RESPONSES	
<p>January 3, 2016</p> <p>King County Executive Constantine King County Chinook Building 401 5th Ave Suite 800 Seattle, WA. 98104</p> <p>kcexec@kingcounty.gov</p> <p>Dear County Executive Constantine,</p> <p>I'm writing this letter in opposition to the proposed King County Comprehensive Plan 2016 Update of implementing zoning changes on parcels 15250790, 1525079005, and L525079010 from rural to urban near Carnation</p> <p>These parcels border my 12 acre farm and other 75 acre farms. I leased and farmed these parcels for the past 40 years. They recently were sold to the Remlinger Investment Group who are requesting the zoning changes. It is my understanding that they are asking to preserve 20 of the lower acres and cluster 19 homes on 5 acres on the hill side. I have worked with King County for the past 40 years to protect our farm lands as a member of the King County Ag Commission, Chairman of the East King County Ground Water Advisory Committee, and King County Flood Advisory Committee, and Carnation City Council. I have activity been involved in protecting our rural lands. One of the major reasons is I'm opposed to the zoning is the impact it will have on the surrounding farms. When Carnation annexed the Clinton property into the city for the 75 homes that they have been building we have seen an increase in water runoff on our properties. To allow 19 homes on the hill side will create a major impact to our properties. It is my understanding that King County staff has visited the properties and have met with the Remlinger group. No one has contacted me or my neighbor's farm considering the proposal. I am requesting county staff contact us before his proposal is submitted to the king county counsel.</p> <p>I am including pictures of recent water runoff and also I'm including the petition against the proposal. I would appreciate your consideration in this matter</p> <p>Sincerely</p> <p>Dick Jones PO Box 244 Carnation WA. 98014 425-333-4795</p>	<p>Comments noted. King County appreciates the time Mr. Jones on these important civic activities.</p> <p>King County staff emailed Mr. Jones on the day after this letter was received but did not receive a reply. King County staff did however hold a public meeting in the area and many residents attended to discuss this Area Zoning Study; a summary of the comments is shown in Section V of this report.</p> <p>Thank you for submitting the photographs.</p>	

DICK JONES – CARNATION AREA ZONING STUDY		
COMMENT	RESPONSES	
		

DICK JONES – CARNATION AREA ZONING STUDY

COMMENT

RESPONSES



DICK JONES – CARNATION AREA ZONING STUDY		
COMMENT	RESPONSES	
 <p>The top photograph shows a wide, flat field with patches of snow and some green grass. In the background, there are several evergreen trees and a house with a blue roof. The bottom photograph shows a similar field, but with a line of trees in the background, including some evergreens and some bare deciduous trees.</p>		

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M. LEONARD (ENTERPRISE COMMUNITY PARTNERS) – MULTIPLE TOPICS	
COMMENT	RESPONSES
<i>From: Leonard, M. A. [mailto:mleonard@enterprisecommunity.org] Sent: Wednesday, January 06, 2016 10:10 PM</i>	

M. LEONARD (ENTERPRISE COMMUNITY PARTNERS) – MULTIPLE TOPICS

COMMENT

RESPONSES



January 6, 2016

Mr. Ivan Miller *Comprehensive Planning Manager* Performance, Strategy and Budget
401 5th Ave.
Seattle, WA 98104

RE: Enterprise Community Partners Comments on the King County Comprehensive Plan Update

Dear Mr. Miller:

Thank you for the opportunity to comment on King County's Comprehensive Plan update.

Enterprise is a national intermediary delivering capital, developing the programs and advocating for the policies needed to create and preserve homes that people can afford. Since 1982, we have created nearly 340,000 homes and invested \$18.6 billion across the county. Our Pacific Northwest office, based in Seattle, is one of ten regions in the country where we focus our work. Current priorities in King County are centered on addressing the mounting affordability challenges, as well as on the regional equitable development initiative (REDI), a key component of which, the REDI Acquisition Fund, is launching early this year.

We greatly appreciate King County's long commitment to policies and programs that address the housing needs for all county residents. And we applaud policies in the Plan update which address emerging issues associated with rapid economic expansion, population growth and income disparity. Housing is a household's largest expenditure, and it is also the platform from which county residents access the opportunities they need to reach their full potential. Place of residence matters. The Comprehensive Plan plays a critical role in determining whether residents of all incomes can find affordable homes near work, school, transit, and other important services.

We strongly support the promotion of a diversity of housing densities and types, including multi-family housing, in the Urban Communities chapter. Connected, urban centers are critical and desirable, and we must ensure a diversity of housing types are provided in these communities of opportunity. Affordability in Seattle is forcing many people to move further from their jobs, and as families and individuals migrate away from the city center, housing prices in smaller communities are rising, particularly in the areas near light rail stations. The County must aggressively pursue incentives like density bonuses and tax policies in these areas to ensure that affordable housing is expanded low-wage workers who are the backbone of the County's service industry. The Urban Communities chapter should provide more specific affordability goals, to address the needs of this population.

Sites for affordable housing are so very critical, and the County's commitment to prioritize surplus public lands for affordable housing, as demonstrated through H-157 is an excellent approach. Capital external to the region, including foreign capital, is a major factor in both rent escalation, and displacement. Public resources and preferences, like those for surplus property, should be provided explicitly for those developers that commit to including affordability for low-income households.

Policies addressing housing quality are also a strong addition. Housing quality and condition vary considerably in different parts of the County, but your commitment to healthy, affordable housing as expressed in the Urban Communities and Housing & Human Services chapters, is particularly important in areas like south King

ENTERPRISE
2025 First Avenue • Suite 1250 • Seattle, WA 98121 • www.enterprisecommunity.org • www.enterprisecommunity.com

Comments noted; thank you for your support of the housing and affordable housing related provisions in the 2016 Plan.

M. LEONARD (ENTERPRISE COMMUNITY PARTNERS) – MULTIPLE TOPICS		
COMMENT	RESPONSES	
<p>County, where lower income residents have few choices, and housing conditions have been shown to pose health risks. Policies that support a housing code and implementing applicable inspections (H-113), relocation assistance funding (H-161), private development loans and financing for maintenance (H-162), Preservation Tax Exemption (H-141), Just Cause Eviction (H-172).</p> <p>Lastly, King County's monitoring and data capacity will be critical to holding jurisdictions accountable to the new Countywide Planning Policies housing requirements. H-106 & H-110b provide some commitment to this work. It will be useful to work cooperatively with the State's new Housing Needs Study to ensure data consistency.</p> <p>Thank you for your consideration.</p> <p>Sincerely,</p> <p> M.A. Leonard Pacific Northwest Market Leader & Vice President Enterprise Community Partners</p> <p style="text-align: right;">2</p>	<p>Comments noted regarding the importance of monitoring and data, and consistency with related monitoring programs.</p>	

EMMA NEWBY LETESTU — RURAL DEVELOPMENT	
COMMENT	RESPONSES
<p><i>From: renewby@centurytel.net [mailto:renewby@centurytel.net]</i></p> <p><i>Sent: Monday, January 04, 2016 6:02 PM</i></p> <p>As you intend to extend the urban areas and even in the rural ones which become more dense in population. I suggest that more regulations should be enforced regarding noise, light and air pollution with a strong regard concerning energy reduction.</p>	<p>Comments noted. King County agrees that these are important issues in both rural and urban areas and has multiple programs and regulations that guide development impacts in these areas.</p>

ELKE LEWIS — DUTHIE HILL NOTCH AREA ZONING STUDY	
COMMENT	RESPONSES
<p data-bbox="191 337 842 363"><i>Comprehensive Plan Community Meeting – Hardcopy Submittal</i></p> <div data-bbox="191 423 1001 1360" style="border: 1px solid black; padding: 10px;"> <p data-bbox="260 532 506 610">Elke Lewis 2618 - 271st Avenue S.E. Issaquah 98029</p> <p data-bbox="260 646 936 672">I am against annexing with the City of Sammamish for several reasons.</p> <p data-bbox="260 701 915 808">No. 1 is that this would open us up to high density development. I believe there is already so much developing going on on the Plateau, that developing our area is totally unnecessary. There is no need to disturb our area.</p> <p data-bbox="260 837 957 915">No. 2 We have sensitive wetland areas, a pond and a wildlife corridor running through The Notch. Construction here would greatly compromise these sensitive areas that have been unhampered for decades.</p> <p data-bbox="260 945 905 1023">No. 3 With construction comes making our roads have to be at city code (270th and 271st). There is already enough traffic congestion. Upgrading these roads will just create more traffic problems.</p> <p data-bbox="260 1058 785 1084">I stand firm against annexation and changing our UGA.</p> <p data-bbox="260 1114 386 1166">Respectfully, Elke Lewis</p> </div>	<p data-bbox="1457 711 1839 850">Comments noted; these are consistent with the recommendations in the Area Zoning Study.</p> <p data-bbox="1457 932 1850 1036"><i>(See additional responses at Darin Goehner (Moss Adams) above).</i></p>

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SUSAN MARKS — EAST RENTON ANNEXATION AREA, DOCKET REPORT # 5						
COMMENT	RESPONSES					
<p><i>From: S Marks [mailto:seattlequilter@msn.com]</i> <i>Sent: Tuesday, January 05, 2016 7:00 PM</i></p> <p>Thank you for the opportunity to comment on the Comprehensive Plan.</p> <p>If I understand the proposal correctly to the Comprehensive Plan (see copy from the proposal below), I feel an immediate re-evaluation of the Urban Growth Area planning for this area is critical. Currently large trees are being stripped haphazardly for fast development without consideration for the environment. There is more street flooding than I have ever seen. In addition, it does not appear there is good planning of roads/traffic. Traffic is a mess, disorganized without thought to growth and/or businesses. I highly urge the Executive Recommendation to consider a HALT to further Growth Management in the Renton area and allow a separate period of time for public comment on what is needed before moving forward on additional plans.</p> <p>This topic needs to be heavily socialized, not just on the King County Government Comprehensive Planning site, but other social methods – Facebook, Radio, Newspapers, Mailing flyers, etc. before going forward with any other Urban Growth actions. If we do not stop and re-evaluate this destructive expansion, Renton will soon be a place that is in chaos, and no longer a beautiful area. Please accept my recommendation.</p> <p style="text-align: center;">[NOTE: Table from 2015 Comprehensive Plan Docket Report]</p> <table border="1" data-bbox="281 1263 1339 1403"> <tr> <td data-bbox="281 1263 340 1403">5</td> <td data-bbox="340 1263 422 1403">Peter Eberle</td> <td data-bbox="422 1263 470 1403">CD9</td> <td data-bbox="470 1263 1339 1403"> Request: To move the Urban Growth Area back to the current Renton City Limits on the East Renton Plateau. Or, to disallow small annexations until entire PAA choose to annex. </td> </tr> </table>	5	Peter Eberle	CD9	Request: To move the Urban Growth Area back to the current Renton City Limits on the East Renton Plateau. Or, to disallow small annexations until entire PAA choose to annex.	<p>Comment noted.</p> <p>There is no subarea planning scheduled for this area in the near term, although the 2016 Plan includes a policy (U-208) stating its support to partner with a potential annexing city or to use city development standards if the sign commits to future annexation.</p> <p>Note that with the re-establishment of the Community Service Area Planning Program, the potential annexation areas will be reviewed once every four years. The next cycle for these areas is 2020. Additionally, Chapter 12 of the 2016 Plan includes a Workplan item to engage in discussions with King County cities to revisit the Potential Annexation Area map and annexation</p>	
5	Peter Eberle	CD9	Request: To move the Urban Growth Area back to the current Renton City Limits on the East Renton Plateau. Or, to disallow small annexations until entire PAA choose to annex.			

SUSAN MARKS – EAST RENTON ANNEXATION AREA, DOCKET REPORT # 5			
COMMENT			RESPONSES
		<p>In addition to the Comprehensive Plan, the Countywide Planning Policies guide the establishment of the urban growth area – both for expansions and contractions. The majority of this area does not meet the requirements for contracting the urban growth area.</p> <p><u>Executive Recommendation:</u> Do not support request. However, given the importance of the issues and the challenges that remain in the existing potential annexation areas, initiate work with the Growth Management Planning Council and other relevant stakeholders such as a special purpose districts to the reconsider the Potential Annexation Area designations.</p>	<p>countywide planning policies. The issues you raise are likely to be part of this future project.</p>

ERIN MCINTYRE – VASHON-MAURY ISLAND SUBAREA PLANNING			
COMMENT			RESPONSES
<p><i>From: Erinn McIntyre [mailto:erinnmcintyre@yahoo.com]</i> <i>Sent: Wednesday, January 06, 2016 6:25 PM</i></p> <p>I have been trying to submit comments to the Comprehensive Plan Update, but consistently get "Error 404, File not Found" when I try to submit a comment on-line. I hope this email will suffice for comments to the overall plan, and to the Vashon-Maury Island Sub-plan.</p> <p>I am a life-long, environmentally conscious, King County resident. Yesterday, I was at DPER to discuss a property I recently bought on Vashon Island. Having spent significant time talking with an engineering/permit expert there, I am quite concerned by the lack of planning around issues we all face in living in a world with limited resources. While we are blessed with significant rainfall (and not blessed with last summer's serious drought), I am taken aback by what appears to be a lack of focus in this Plan Update on environmentally progressive problem solving.</p>			<p>King County regrets that you had trouble accessing the document during the update process. Note that the pages have all been fixed and are now back online.</p>

ERIN MCINTYRE – VASHON-MAURY ISLAND SUBAREA PLANNING	
COMMENT	RESPONSES
<p>In providing this comment to the Comprehensive Plan Update and the Vashon-Maury Island Sub-plan, I ask that the County not just start to look at, but actually take steps towards, new, updated, environmentally relevant and green resource, building, health department and code issues, by initiating pilot projects and limited variances. I propose that pilot projects and site-specific variances be allowed to deal with the following issues: 1) alternatives to on-site septic systems, particularly to bring existing structures into or closer to building code compliance by exploring and allowing alternatives to the current health department requirements for large on-site septic systems and drain fields (composing toilets, incinerating toilets, and the like); 2) water conservation (rain water, run-off, graywater reuse, support for and assistance with on-site cisterns for irrigation, etc.); 3) a focus on and openness to dealing with arsenic and lead through new, novel, and environmentally "friendly" approaches (ie pilot projects for bio-remediation and the like); 4) solar or other renewable energy approaches (which would likely consequently result in a variance to that structure's energy code requirements; 4) a general and genuine effort by the County to help bring properties and existing structures with code problems or defects into safe and reasonable condition -- not by specific compliance with existing or antiquated Codes and methods, but rather by site-specific solutions that are geared towards helping people achieve safe and reasonable properties by allowing site-specific, environmentally progressive alternatives.</p> <p>I understand this may cost a little more money than enforcing strict compliance with existing code, but the time to move forward into the future and solve our environmental problems is now. We have to start somewhere. There must be latitude granted to try new things. This need not be County-wide, code-wide, nor does it require years of studying and thinking about it. It's been done -- just not by us. Please, just be willing and supportive of trying some new things, and allow for environmentally responsible, innovative problem solving in our County's Comprehensive Plan. Others are doing this, and we are needlessly lagging behind, in no small part because it has not been a priority.</p> <p>Last week, I toured the Bullitt Center in Seattle and was astounded by the conservation and novel approaches in place there. I believe it is long past time to initiate some pilot projects or allow variances for King County residents who are committed to find ways to lower their resource use and carbon footprint. <i>We could use the County's help in doing this.</i> (I had quite a chuckle with the DPER specialist yesterday when he tried to pull up with Green Building Manual on-line and the link results in "Error 404 - file not found".) I also understand that there is no "expert" or point person for the Green Building Program, nor is there anyone who deals with novel environmental solutions at DPER. That is indeed</p>	<p>These are great ideas and this is a very thoughtful letter. The County is willing to work with those who propose development through pilot or demonstration projects; to do this, applicants must be willing to show how safety standards will be met and, possibly, back up systems in case they don't. The County is interested in learning about about projects you may know of or are working on. As a County, we want to increase the use of green building techniques and have all new structures be sustainable. We need someone like you who is willing to help us learn and try new approaches.</p>

ERIN MCINTYRE – VASHON-MAURY ISLAND SUBAREA PLANNING	
COMMENT	RESPONSES
<p>unfortunate.</p> <p>Vashon is unique within King County. I am delighted to see that there is a sub-plan being developed for Vashon for this very reason. Vashon has limited water resources, significant on-site septic issues, in terms of environmental impacts and compliance (or lack thereof) with current outdated health department codes and approaches. Regarding the arsenic and lead plume, because it is an island, remediation is difficult and prohibitively expensive. Planting grass is not a sufficient solution, and some types of grass uptake arsenic and allow it to enter the food chain when deer and other critters eat it. I recently started looking into bio-remediation, and while there are particular plants that efficiently uptake these toxic elements, there appears to be no existing project to try this, nor do there appear to be available disposal options for the resulting toxic biomass. I would like to try bio-remediation, and I'm sure others would as well, but I believe the County should be involved in providing guidance for disposal of the resulting toxic biomass. It cannot be burned (arsenic will go into the air); it should not be buried on-site (will enter water); it should not be composted (will recontaminate soil and enter food chain).</p> <p>Please understand that I appreciate the work the County is doing and the steps it has taken to encourage green building, raising awareness about arsenic and lead, the endless quest to address failing septic systems, dealing with noxious weeds, and the like. And, I certainly believe it is in the public interest to have building codes that keep us safe and provide standards that are both necessary and reasonable. That being said, I believe it is time the County is open to trying some new things now, being more open to solving site-specific problems with current and novel technology and approaches, not just identifying problems and demanding strict compliance or saying "no" because something has not been allowed before. I really believe we need to be a <i>leader in innovation and prioritizing where we want to be environmentally</i>, not where we have been or are now.</p>	

BERNIE MCKINNEY – INTEGRATED PEST MANAGEMENT	
COMMENT	RESPONSES
<p><i>From: B.mckinney@comcast.net</i> <i>Sent: Thursday, November 12, 2015 3:30 PM</i></p> <p>I have been reading the current comp plan and the 2016 updates. I do not see anything about Integrated Pest Management when referring to landscape management/forestry or parks or noxious weed management. I think it should mention IPM in multiple places in all aspects of land management.</p>	<p>Thank you for your comments. Edits have been made to reflect this issue in multiple locations, including Chapter 3 section II.B.1. Forestry, Chapter 5 section IV.3.h and policies E-430 and E-506</p>

JOHN MILESKI – DUTHIE HILL NOTCH AREA ZONING STUDY	
COMMENT	RESPONSES
<p><i>From: John Mileski [mailto:john.mileski@hotmail.com]</i> <i>Sent: Friday, December 11, 2015 8:31</i></p> <p>Dear King County Executive Constantine,</p> <p>On behalf of the High Country Homeowners Association Board, attached is a letter outlining our opposition of the proposed amendment to the Countywide Planning Policy DP-16 to annex the Duthie Hill Notch.</p> <p>In 2012, the King County Executive Staff and yourself opposed this proposal. Attached and cited in my letter, I have included Executive Office studies and staff comments to the King County Council that outline the reasons for the Executive Office's opposition to transferring the Notch from rural to urban:</p> <ol style="list-style-type: none"> 1) 2012 King County Comprehensive Plan Update, Sammamish UGA study (08/29/12), 2) Growth Planning Council Meeting, presentation by Paul Reitenbach (09/11/12) 3) Lauren Smith, Deputy Director Regional Planning, King County Council comments opposing the proposal (12/3/2012). 	<p><i>Comments noted. As these raise similar points, please see the responses at Darin Goehner (Moss Adams) above.</i></p>

JOHN MILESKI – DUTHIE HILL NOTCH AREA ZONING STUDY	
COMMENT	RESPONSES
<p>Similar to the Executive's Office, we oppose this proposal due to:</p> <ol style="list-style-type: none"> 1) The adverse environment impact this proposal presents to the protected wetlands contained in the Notch and to Patterson Creek, a natural bearing salmon stream. 2) The City of Sammamish has not provided evidence that it requires the re-designation of rural lands to urban to accommodate it's long term growth plans. 3) The City's rationale for this proposal is to correct a UGA boarder irregularity; this is not appropriate rationale to re-designate the lands from rural to urban; boarder irregularities we're thoughtfully planned for a purpose, in this instance to protect the wetlands and Patterson Creek. <p>Attached is a letter detailing our position and supporting King County Executive staff studies supporting our position.</p> <p>Thank you very much for your consideration.</p> <p>John A. Mileski High Country HOA, Past President</p>	
<p>December 11, 2015</p> <p>RE: Sammamish Request – Duthie Hill Notch Growth Management Planning Council</p> <p>Dear King County Executive Constantine,</p> <p>I am writing to you in regards to the City of Sammamish's July 22, 2015 request to amend the Countywide Planning Policy DP-16 and annex the Duthie Hill Notch into Sammamish.</p> <p>As past president of the High Country HOA, on behalf of our association and our 115 residents we oppose this proposal. The Duthie Hill Notch borders the High Country community on two sides and the proposed planning policy amendment adversely impacts our community and presents <u>significant environmental risks</u> to the <u>adjacent wetlands and Patterson Creek</u>.</p>	

JOHN MILESKI – DUTHIE HILL NOTCH AREA ZONING STUDY	
COMMENT	RESPONSES
<p>In 2012 and 2015, residents from our community and the adjacent Windsor Heights HOA have met multiple times with Sammamish city leaders to express our concerns. However, there was little flexibility in the city’s position and in our view, the July 22, 2015 request to amend the Planning Policy is an attempt to bypass the UGA procedures and policies.</p> <p>We oppose the proposed amendment to the Countywide Planning Policy DP-16 and annex the Duthie Hill Notch into Sammamish for the following reasons:</p> <ol style="list-style-type: none"> 1. Adverse environmental impacts to the neighboring protected wetlands and Patterson Creek, a natural bearing salmon stream. UGA lands must be free of environmental constraints and that is <u>not</u> the case with the Notch. 2. The City of Sammamish has not provided evidence that additional urban lands are required to support their adopted growth rate targets. This is a key criteria for moving lands from rural to urban. As a result, annexation of the Duthie Hill Notch is in <u>inconsistent</u> with the County’s UGA policies. 3. The city contends they are attempting to correct a border irregularity. However, UGA border irregularities and notches are <u>very common</u> and <u>originally planned for a reason</u>. Boarder irregularities are <u>not a reason</u> for annexation or Policy Planning amendments <p>The following provides additional details and evidence for each of the above reasons. Much of supporting documentation is sourced from prior King County Executive Office studies and testimony.</p> <div data-bbox="191 1084 1423 1182" style="border: 1px solid black; padding: 5px;"> <p>1 – Adverse environmental impacts to the neighboring wetlands and Patterson Creek, a natural bearing salmon stream. UGA lands must be free of environmental constraints and that is not the case the Notch.</p> </div> <p>The Duthie Hill Notch includes a pond and wetlands that flow from two locations into Patterson Creek, a natural bearing salmon stream. Future development in the notch threatens both the environmentally sensitive wetlands in the Notch and Patterson Creek.</p> <p>The following studies and King County Executive staff comments to the King County Council provide evidence of the potential <u>negative environmental impacts</u>:</p>	

JOHN MILESKI – DUTHIE HILL NOTCH AREA ZONING STUDY	
COMMENT	RESPONSES
<ul style="list-style-type: none"> • 2012 King County Comprehensive Plan Update, Sammamish UGA, Area (August 29, 2012)(Appendix A, page 3) <ul style="list-style-type: none"> ○ The study recommends “against” the annexation of the Notch to the City of Sammamish. <p><i>“A re-designation to urban would require improvement in the road infrastructure and may impact the pond and mapped wetland. KCCP policy U-102(d) calls for UGA lands to be free of environmental constraints. The pond, stream and wetland make re-designation of the study area to urban inconsistent with this policy.”</i></p> <p>Executive Staff Recommendation – <i>“Make no adjustment to the King County Comprehensive Plan (KCCP) Land Use Map and zoning for the Duthie Hill Road study.</i></p> • King County Executive Staff, Lauren Smith, comments to the King County Council on December 3, 2012 regarding the Notch proposal – clearly outlines the concerns associated with the environmentally sensitive features of the Notch and this was a major reason for the Executive’s opposition to the proposal in 2012. <p>Below are several of Ms. Smith’s comments outlining the reasons the Executive opposed the proposal.</p> <ul style="list-style-type: none"> ○ <i>“In this case the Notch contains the headwaters of Patterson Creek, which is an important salmon bearing stream; it was left out of the UGA for that reason.”</i> ○ <i>“ the water system feeds a major salmon bearing system in Unincorporated King County, those types of lands are not appropriate for inclusion in the Urban Growth Area.”</i> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p>2-The City of Sammamish has not provided evidence that the additional urban lands are required to support their adopted growth rate targets. This is a key criteria for moving lands from rural to urban. As a result, annexation of the Duthie Hill Notch is in inconsistent with the County’s UGA policies.</p> </div> <p>The City of Sammamish has not demonstrated a lack of buildable lands for increased density or jobs. This is a key criteria in moving lands from rural to urban and the city has not satisfied this requirement.</p> • Growth Management Planning Council Meeting, Presentation by Paul Reitenbach – September 11, 2012 (Appendix B, page 5) 	

JOHN MILESKI – DUTHIE HILL NOTCH AREA ZONING STUDY	
COMMENT	RESPONSES
<ul style="list-style-type: none"> • “The reasons this proposal are not supported by the Executive include: <ul style="list-style-type: none"> ○ <i>“No evidence has been submitted by the City of Sammamish that additional urban land is needed to accommodate their adopted growth targets.”</i> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p>3-UGA Border Irregularities and Notches are common in the UGA and not adequate reason to transfer lands from rural to urban.</p> </div> <ul style="list-style-type: none"> • The request to amend the Countywide Planning Policy DP-16 and annex the Duthie Hill Notch into Sammamish to address irregularities in borders in <u>not appropriate</u> or <u>adequate</u> rationale to amend the Countywide Planning Policy. • King County Executive Staff, Lauren Smith, Comments to the King County Council on December 3, 2012 regarding the Notch proposal <ul style="list-style-type: none"> ○ <i>“Little notches like this are all up and down the Urban Growth Boundary, these are either environmentally sensitive areas or areas that lack sewers or other criteria why it’s not appropriate to include in the Urban Growth Area. In this case, the Notch contains the headwaters of Patterson Creek which is an important salmon bearing stream”</i> <p>Thank you very much for your consideration and prior support in opposing this proposal.</p> <p>John A. Mileski, Past President, High Country HOA</p> <p>Attachments:</p> <ul style="list-style-type: none"> – 2012 Growth Management Planning Council Staff Report on Countywide Planning Policy Map Amendments Related to the King County Comprehensive Plan – 2012 Sammamish Urban Growth Area – Area Zoning Study 	

DEL MOORE – FALL CITY AREA ZONING STUDY	
COMMENT	RESPONSES
<p><i>From: fallcity@yahoogroups.com On Behalf Of del@ironree.com</i></p> <p><i>Sent: Saturday, November 21, 2015 10:28 AM</i></p> <p>I thought it was illogical during the last review of the comprehensive plan that the properties on the north side of SR-202 (Barfuse et al) were not included in the CBD since the area has been largely commercial for a long time.</p> <p>Possible inclusion of the FCES in the CBD has been discussed in the context of being "deep pockets" with regard to the wastewater system (ULID). It's my understanding that the school's existing onsite system is maxed out and a sizable chunk of money has been set aside by the district to upgrade the system. It would make more sense to just include it in an expanded business district ULID.</p> <p>I attended the meeting between Kathy Lambert and a large number of the CBD property owners. There seemed to be some skepticism about the project when the meeting started but at the end a show of hands overwhelmingly indicated support for continuing to pursue the project. Of course, no one has been asked to write a check yet so further support is going to depend on getting grants to reduce the cost to the property owners. Including the FCES property in the ULID could bring a chunk of money to help in this regard.</p> <p>It's disappointing if the entire Rainier property (three parcels) was excluded from consideration for inclusion in the CBD. It seems at least one of the parcels might be a candidate for rezoning making inclusion in the CBD possible.</p> <p>I've watched channel 22. (makes me sleepy).</p>	

ARVIA MORRIS – SUSTAINABLE INFRASTRUCTURE	
COMMENT	RESPONSES
<p><i>From: Arvia Morris [mailto:morris358@zipcon.com]</i> <i>Sent: Wednesday, January 06, 2016 12:52 PM</i></p> <p>Dear Dow Constantine,</p> <p>I am glad to be able to comment on the King County 2016 Comprehensive Plan Draft. Here are my priorities for the future of King County:</p> <p>Addressing Climate change and developing a sustainable infrastructure should be at the heart of the Comprehensive plan.</p> <p>Sustainability and climate change are mentioned in the Draft plan, but only generally. Specific goals should be included. For example King County should be planning to use 100% renewable sources of electricity in the next 20 years. This can be done with Solar and wind.</p> <p>Electrification of as much of our transportation grid as possible should be stated as a goal. Though improved mass transit and concentrated urban villages can reduce congestion, there will still be as much driving around in 20 years as there is today. That driving needs to happen in cars that are electric and we need the charging stations to support them.</p> <p>The mass transit system should be powered 100% by renewable carbon neutral energy. This should be stated in the plan.</p> <p>All construction should meet the highest energy and water use efficiency standards. If possible new construction should go beyond LEED to the living building standard where the building site can reuse grey water and generate its own energy.</p> <p>The practices above will become mainstream if King County adopts them and leads the way. Over the life time of a building or transit system using renewable energy will pay for itself.</p> <p>All projects, public and private, should have a full life cycle analysis done on the cost of the project before committing to the project. This should include operating and maintaining a project. In addition recycling</p>	<p>Thank you for your comments. In particular thank you for your suggestions on some very ambitious carbon reduction goals for the County. While the Comprehensive Plan transmitted to the Council does not include a goal of 100% renewables by 2020, some new policies are proposed with respect to climate change:</p> <p>Most important to note is that the 2016 Comp Plan policies on climate change were significantly influenced by the County's 2015 Strategic Climate Action Plan. This document set ambitious targets for the County to achieve greenhouse gas reductions countywide and in the operations of the County.</p> <p>Please note policies E-206, E-206a, E-206 b, E-206c and others.</p>

ARVIA MORRIS – SUSTAINABLE INFRASTRUCTURE	
COMMENT	RESPONSES
<p>material at the end of project needs to be accounted for. When all cost are considered greener solutions often pay for themselves.</p> <p>The carbon foot print of all water, water treatment and water discharge needs to be calculated and 0 carbon footprint solutions need to be developed. In the sewage treatment area, recycling of waste products to agriculture can be achieved. All methane should be captured for all human and animal waste treatment and reused.</p> <p>These are just a few ideas and goals that should be included and spelled out in the Comprehensive plan. There is a strong need to be much more explicit about what sustainable infrastructure is and specific goals for a 0 carbon foot print in King County. We must reach the 0 carbon foot print to avoid the worst impacts of climate change which will disrupt our way of life completely for everyone.</p> <p>Thank you for considering my views.</p>	

BONNIE MORRISON – CARNATION AREA ZONING STUDY	
COMMENT	RESPONSES
<p><i>From: Bonnie Morrison [mailto:bon@bonniestlc.com]</i></p> <p><i>Sent: Monday, January 04, 2016 4:19 PM</i></p> <p>I am less than 6 acres from the Proposed changes on Gary Remlinger’s recently purchased property just north of Carnation. With many of my immediate neighbors, we are as opposed to changing the zoning for development there as we can possibly be. The proposed saving of wetland acreage to put houses above it is absurd when the wetlands are not build able in the first place, therefore saved anyway. We will continue to fight the loss of our farming community with every avenue at our disposal and urge you to help us save the beauty of our farm lands. Please help and don’t allow this proposed development encroachment. Thanks for reading this.</p>	

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GEORGE NEWMAN – NORTH BEND AREA ZONING STUDY		
COMMENT	RESPONSES	
<p><i>From: George Newman [mailto:gnewman@barghausen.com]</i> <i>Sent: Tuesday, January 05, 2016 10:21 AM</i></p> <p>On behalf of our clients, Chuck and Jim Kusak, we are submitting public comments on the 2016 Comprehensive Plan Update specifically directed at Area Zoning Study #13 - North Bend UGA Amendment as identified in the Public Review Draft. This is in advance of the closing of the public comment period on January 6, 2016. We attended the December 2, 2015 community meeting in Fall City, but the primary focus was on 5 of the 16 study areas and Area Zoning Study #13 was not formally discussed.</p> <p>This specific proposed amendment and UGA expansion area consists of 14 tax parcels with a total area of 97.6 acres. The current City of North Bend Urban Growth Area (UGA) boundaries are contiguous to the easterly and northerly boundaries of the subject property. The southwesterly boundary of the subject property has the distinct physical boundary of the Snoqualmie River.</p> <p>Please enter the attached letter into the public record [shown below, with the email from Londi K. Lindell, City Administrator, City of North Bend to King County Councilmembers dated April 27, 2015 in support of the UGA expansion].</p>		

GEORGE NEWMAN — NORTH BEND AREA ZONING STUDY

COMMENT

RESPONSES



CIVIL ENGINEERING, LAND PLANNING, SURVEYING

January 4, 2016
EMAIL DELIVERY
compplan@kingcounty.gov

Ivan Miller, AICP
Karen Wolf, AICP
King County Office of Performance, Strategy & Budget
Chinook Office Building
401 Fifth Avenue, Suite 810
Seattle, WA 98104

RE: Comments on 2016 Comprehensive Plan Update
Area Zoning Study #13- North Bend UGA Amendment
BCE Job No. 17603

Dear Ivan / Karen:

On behalf of our clients, Chuck and Jim Kusak, we are submitting public comments on the 2016 Comprehensive Plan Update specifically directed at Area Zoning Study #13 - North Bend UGA Amendment as identified in the Public Review Draft. This is in advance of the closing of the public comment period on January 6, 2016.

This specific proposed amendment and UGA expansion area consists of 14 tax parcels with a total area of 97.6 acres. The current City of North Bend Urban Growth Area (UGA) boundaries are contiguous to the easterly and northerly boundaries of the subject property. The southwesterly boundary of the subject property has the distinct physical boundary of the Snoqualmie River.

The King County Office of Performance, Strategy & Budget concluded in the Draft 2016 Comprehensive Plan Update for Area Zoning Study #13 - North Bend UGA Amendment: "Do not expand the UGA boundary at this time, but consider a Four-to-One proposal should the property owner(s) apply" (page 8).

We attended the December 2, 2015 community meeting in Fall City, but the primary focus was on 5 of the 16 study areas and Area Zoning Study #13 was not formally discussed.

1. Support by the City of North Bend

Email from Londi K. Lindell, City Administrator, City of North Bend to King County Councilmembers dated April 27, 2015 in support of the UGA expansion is enclosed.

The email states "The City of North Bend administratively supports this amendment and encourages passage by the King County Council. This amendment is consistent with the Growth Management Act (GMA) and adds a missing link to North Bend's Potential Annexation Area. The GMA also supports the use of natural geographic features to create urban growth boundaries and this amendment is consistent with this direction by using the South Fork of the Snoqualmie River to create such a boundary."

Comment: We concur with the above conclusion. This is the only area on the north side of the Snoqualmie River which is currently not within the North Bend UGA. In addition, all of the subject property is within 2,000 feet of a significant freeway interchange. The current UGA boundaries are contiguous to the easterly and northerly boundaries of the subject property.

18215 72ND AVENUE SOUTH KENT, WA 98032 (425) 251-6222 (425) 251-8782 FAX
BRANCH OFFICES • TUMWATER, WA • LONG BEACH, CA • ROSEVILLE, CA • SAN DIEGO, CA
www.barghausen.com

GEORGE NEWMAN — NORTH BEND AREA ZONING STUDY

COMMENT

RESPONSES

King County Office of Performance, Strategy & Budget
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January 4, 2016

2. Applicable Growth Management Act (GMA) Citations

RCW 36.70A.110 Comprehensive plans—Urban growth areas.

(1) Each county that is required or chooses to plan under RCW 36.70A.040 shall designate an urban growth area or areas within which urban growth shall be encouraged and outside of which growth can occur only if it is not urban in nature. Each city that is located in such a county shall be included within an urban growth area. An urban growth area may include more than a single city. An urban growth area may include territory that is located outside of a city only if such territory already is characterized by urban growth whether or not the urban growth area includes a city, or is adjacent to territory already characterized by urban growth, or is a designated new fully contained community as defined by RCW 36.70A.350.

Comment: The subject property's east and north boundaries are contiguous to the current City of North Bend Urban Growth Area (UGA) boundaries. The Snoqualmie River on the southwest boundary establishes a permanent physical separation from the rural residential uses on the south side of the river.

(2) Based upon the growth management population projection made for the county by the office of financial management, the county and each city within the county shall include areas and densities sufficient to permit the urban growth that is projected to occur in the county or city for the succeeding twenty-year period, except for those urban growth areas contained totally within a national historical reserve. As part of this planning process, each city within the county must include areas sufficient to accommodate the broad range of needs and uses that will accompany the projected urban growth including, as appropriate, medical, governmental, institutional, commercial, service, retail, and other nonresidential uses. Each urban growth area shall permit urban densities and shall include greenbelt and open space areas.

Comment: The shoreline designation on the north side of the Snoqualmie River will provide a greenbelt area of 200 feet parallel to the river and further provide visual and physical separation from land uses on the south side of the river and beyond. This greenbelt area will form the outer perimeter of the future UGA and allow urban densities on the buildable portion of the 98.7 acres.

(3) Urban growth should be located first in areas already characterized by urban growth that have adequate existing public facility and service capacities to serve such development, second in areas already characterized by urban growth that will be served adequately by a combination of both existing public facilities and services and any additional needed public facilities and services that are provided by either public or private sources, and third in the remaining portions of the urban growth areas.

Comment: Urban infrastructure of both public water and sanitary sewers could be extended to serve the property. There would be minimal local road improvements or offsite traffic impacts because all of the property is within 2,000 feet of a significant I-90 interchange.

3. Collaboration of Property Owners within Area Zoning Study #13

The owners of the 14 parcels comprising the 97.6 acres of Area Zoning Study Area #13 have met and are collectively supporting the comprehensive plan amendment to include this property into the North Bend UGA.

GEORGE NEWMAN — NORTH BEND AREA ZONING STUDY

COMMENT

RESPONSES

King County Office of Performance, Strategy & Budget
Comment- 2016 Comprehensive Plan Update

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January 4, 2016

4. Floodway and Floodplain Delineation Site Specific Refinements

The Public Review Draft of the 2016 King County Comprehensive Plan Update for Area Zoning Study Area #13 states that "there are floodway and floodplain conditions present on three-quarters of the properties". We believe that the generalized floodway and floodplain maps are inaccurate and do not reflect site specific conditions and updated flood plain modeling. We are working through the established process to clarify and refine the floodway and floodplain limits and impacts to the subject property and expect a significant portion of the site to be removed from these limitations after review of an accurate site survey and updated flood plain modeling study.

On December 9, 2015 there was major flooding going on in portions of the Snoqualmie River floodplain. We took the photographs below on this date which showed the Snoqualmie River to be 6 to 8 feet below the top of the revetment known as the "Below Cedar Falls Channel Revetment/Levee.. It was clear by our observations on this date that the "levee" is not accurately depicted on the survey maps to date because of the lack of detail.



Exhibit 1: Snoqualmie River at Southwest Property Boundary, December 9, 2015

GEORGE NEWMAN — NORTH BEND AREA ZONING STUDY

COMMENT

RESPONSES

King County Office of Performance, Strategy & Budget
Comment- 2016 Comprehensive Plan Update

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January 4, 2016



Exhibit 2: Snoqualmie River at Southwest Property Boundary, December 9, 2015



Exhibit 3: Snoqualmie River at Southwest Property Boundary, December 9, 2015

GEORGE NEWMAN — NORTH BEND AREA ZONING STUDY

COMMENT

RESPONSES

King County Office of Performance, Strategy & Budget
Comment- 2016 Comprehensive Plan Update

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January 4, 2016

Please enter this correspondence into the public record to be transmitted to the County Council. If you have any questions or need additional information, please do not hesitate to contact me at this office. Thank you.

Respectfully,



H. George Newman, AICP
Senior Project Manager

HGN/mls

17503c.003.doc

enc: As Noted

cc: Chuck Kusak

Jim Kusak

Tony Kusak

Tom Barghausen, Barghausen Consulting Engineers, Inc.

GEORGE NEWMAN — NORTH BEND AREA ZONING STUDY

COMMENT

RESPONSES

From: Kym Smith
Sent: Monday, April 27, 2015 10:58 AM
To: reagan.dunn@kingcounty.gov; Rod.Dembowski@kingcounty.gov; larry.gossett@kingcounty.gov; kathy.lambert@kingcounty.gov; larry.phillips@kingcounty.gov; dave.upthegrove@kingcounty.gov; jane.hague@kingcounty.gov; pete.vonreichbauer@kingcounty.gov; joe.mcdermott@kingcounty.gov
Cc: Londi Lindell
Subject: Comprehensive Plan Update

Greetings King County Councilmembers:

I am writing regarding striking amendment "S2" being offered by Councilmember Lambert to Proposed Motion 2015-0104 regarding your Comprehensive Plan update (full text of amendment below). The City of North Bend administratively supports this amendment and encourages passage by the King County Council. This amendment is consistent with the Growth Management Act (GMA) and adds a missing link to North Bend's Potential Annexation Area. The GMA also supports the use of natural geographic features to create urban growth boundaries and this amendment is consistent with this direction by using the South Fork of the Snoqualmie River to create such a boundary.

Full Text of Amendment is as follows:

- **North Bend:** Review land use designations and implementing zoning on parcels 1523089218, 1523089217, 1523089216, 1523089147, 1523089039, 1523089132, 1523089149, 1523089194, 1523089170, 1523089019, 1523089124, 1523089133, 1523089018, 1523089137, 2223089055, 2223089002, 2223089026, 2223089019, and 2223089049 and the surrounding area, and consider whether to convert the parcels from rural to urban. The proposal should be evaluated in conjunction with dedication of a portion of the land as open space that is four times the acreage of the land added to the Urban Growth Area.

Thank you in advance for your consideration and support of this amendment.

Londi K. Lindell
 City Administrator
 City of North Bend
 211 Main Avenue North
 North Bend, WA 98045
 425-888-7626 (direct)

lindell@northbendwa.gov



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KARL OSTROM – MULTIPLE TOPICS	
COMMENT	RESPONSES
<p><i>From: Karl Ostrom [mailto:karlo@nbis.org]</i> <i>Sent: Wednesday, January 06, 2016 10:34 AM</i></p> <p>Thank you for the opportunity to comment on the King County 2016 Comprehensive Plan Draft. Here are my priorities for the future of King County:</p> <p>Make King County more affordable. People should be able to live close to where they work. Parts of our County are becoming less affordable, forcing more families to move farther away from where they work, leading to significant negative social, economic and environmental impacts. We need the Comprehensive Plan to support strategies that create greater affordability near key transit centers and employment centers. It should include more funding for affordable housing, and it should include policies that increase the supply of market rate, family size, and affordable units.</p> <p>Put growth in high opportunity locations with good transit service. With the expansion of light rail and bus rapid transit, we should implement an urban communities strategy, which will help the region grow efficiently and responsibly over the next twenty years. We need to have a strategy in place so that increased growth around transit centers does not lead to displacement of people and small businesses. We should have policies, programs and investments that help people and businesses stay in their neighborhoods if they choose.</p> <p>Keep investing in our transportation system with innovative, multi-modal strategies that will keep us moving affordably, safely and sustainably. As King County continues to grow, we must change the way that we move around or we will become mired in gridlock and increased greenhouse gas emissions. Smart, strategic use of our limited roadways will be required to keep King County moving as we add more people and jobs over the next 20 years. We need investments in bike lanes, transit and sidewalks to give people many ways to get around safely while protecting our air and our environment.</p> <p>King County must continue to be a leader in addressing climate change. We need aggressive, bold action to meet our climate goals. Our transportation, land use, capital facilities and environmental goals and</p>	<p>Thank you for the comments regarding affordable housing. The 2016 Plan includes a new chapter on housing and human services; the policies therein have been strengthened to reflect the importance and challenges the region faces in meeting the housing need.</p> <p>The policies focus on placing growth in areas with good transit service. This means focusing growth within cities and centers and supporting transit oriented development.</p> <p>Comprehensive plan policies support multimodal transportation.</p> <p>Multiple chapters have been updated with policies related to Climate Change and reference the work of the Strategic Climate Action Plan and King County Cities Climate Collaboration (the K4-C).</p> <p>Policies related to landslide mapping and notification as well as emergency response have been updated and</p>

KARL OSTROM – MULTIPLE TOPICS	
COMMENT	RESPONSES
<p>policies should work together to protect our natural environment and to prevent climate change. We need to prepare for climate impacts and be sure to protect our most vulnerable residents who are most at risk.</p> <p>Protect our natural resource areas and our rural communities. King County is home to some of the most beautiful farmlands and forest lands. We need to protect these areas to ensure local food sources, wildlife habitat, clean water resources, and recreation.</p> <p>Better Protect People and Property From Natural Hazards. The Oso disaster has underscored the need to better protect people and property from landslides and other natural hazards. Recent research has shown that Oso scale landslides are more common than previously believed. Improve comprehensive plan policies and regulations to protect people and property from natural hazards.</p> <p>Work towards a more equitable future for all. Not all of our residents and communities have the same access to opportunity. The County should be proactive and intentional about advancing race and social justice through its policies, programs and investments.</p> <p>Accountability and measurement. Quantifiable goals will help us track how we are doing. We should expand our metrics and make sure that we are moving in the right direction. It is critical that our tracking and accountability not just focus on county-wide results, but also on specific populations so that no one is getting left behind.</p>	<p>included in the 2016 Plan. The landslide policies were further refined, based on public comment, between the Public Review Draft and Executive Recommended Plan.</p> <p>Policies have been added and updated throughout the 2016 Plan related to equity and social justice; further, mapping data has been included to help explain the relationship of ESJ to the geographies of the Growth Management Act.</p> <p>Chapter 12 includes a new Workplan section that includes an Action to develop a Performance Measures Program that is specifically related to the goals, and timeframes, of the Comprehensive Plan.</p>

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JEFF PAYNE – DUTHIE HILL NOTCH AREA ZONING STUDY	
COMMENT	RESPONSES
<p><i>From: Jeff Payne [jeff_payne@msn.com]</i> <i>Sent: Friday, November 06, 2015 9:54 AM (Resent: Sunday, December 06, 2015 4:11 PM)</i></p> <p>Dear King County Leadership,</p> <p>My name is Jeff Payne. My address is 26717 SE 25th Street Sammamish, Washington, 98025.</p> <p>I am writing on behalf of 130 homeowners in two affected communities that abut the west side of the Duthie Hill Notch. Specifically, I am writing to remind you there are good reasons why King County has twice rejected modification to the UGA in the past seven years (2008 and 2012).</p> <p>Modifying the UGA enables Sammamish City to pursue a development plan that may damage sensitive wetlands.</p> <p>The Duthie Hill Notch contains both a pond and stream that form the high value Patterson Creek 23 wetland, all of which would be adversely affected by the Sammamish City plan to re-zone the 47 acres of the Notch from R-1 to R-4. This plan increases the density of the Duthie Hill Notch from 19 to a potential 80 home sites. King County has recognized this environmental concern in the past. Specifically, the King County August 23, 2012 Study highlighted environmental concerns and recommended against the UGA change. The King County August 29, 2012 Study likewise recommended against an adjustment to the UGA because it was not “free of environmental concerns.”</p> <p>Sammamish City is ignoring the advice of its own expert consultant and pursuing modification of the UGA.</p> <p>Sammamish City has failed to demonstrate the Duthie Hill Notch is needed to meet its growth needs through 2022 as part of the Comprehensive Plan Update. As stated above, the Sammamish City proposal is not “free of environmental constraints”. A showing of both is required to make an adjustment to the UGA. In addition, in February of 2015 Sammamish City spent \$25,000 of tax payers’ money on a consultant, Studio 3MW, who conducted a study and concluded that the Notch does not qualify to be included in the UGA and recommended against pursuing it.</p>	<p><i>See responses at Darin Goehner (Moss Adams) above.</i></p>

JEFF PAYNE – DUTHIE HILL NOTCH AREA ZONING STUDY	
COMMENT	RESPONSES
<p>Sammamish City’s proposed plan would create enduring safety issues for over 200 families in 4 communities. The intended plan to annex, re-zone and connect SE 25th to Trossachs would put another 1,000 cars per day in all of Windsor Heights and parts of High County, Tibbetts Station and Beaver Lake Estates. This data is from Sammamish City’s own traffic study of 2015. This act would severely compromise the safety of pedestrians and children from the 200 families that live and walk to the school bus in these neighborhoods. Moreover, the roads in these neighborhoods are rated as “minor arterials” and not built for that volume of traffic. There are no sidewalks and very few street lights. Upgrading the roads is not permitted per the existing Sammamish City public works standard, but the Sammamish City Engineer has shown a practice of unilaterally overriding these standards as was the case with the Pine Hill neighborhood in 2014. In short we worry that the City of Sammamish will not consider our interests and personal safety.</p> <p>Sammamish City is ignoring the interests of its own citizens in favor of well-connected private interests. The modification of the UGA and annexation of the Duthie Hill notch enriches very few people, none of who are citizens of Sammamish City, but this change damages hundreds of existing Sammamish families. Bringing the Notch into the UGA and annexing it is not in the best interests of the citizens of Sammamish. The homeowners in the Duthie Hill Notch bought property with a rural designation and have no entitlement to expect they can develop it in a manner inconsistent with that original designation.</p> <p>Sammamish City does not need to annex the Duthie Hill Notch to upgrade and maintain Duthie Hill Road. Sammamish City is using the need to widen Duthie Hill road as justification to pursue modification of the UGA. Valid options exist whereby Duthie Hill Road can be widened and maintained with the UGA boundary remaining as is.</p> <p>Nothing has changed since the last time the King County Council voted down modifying the UGA.</p> <p>The King County Council has twice voted down this proposal to modify the UGA to support annexation of the Duthie Hill Notch – in both 2008 and 2012. There have been no new developments that warrant a change in position by the King County Council in 2016.</p>	

JEFF PAYNE – DUTHIE HILL NOTCH AREA ZONING STUDY	
COMMENT	RESPONSES
<p>Thank you for your consideration,</p> <p>Jeff Payne</p>	

DEB PHILLIMORE – VASHON ISLAND HISTORY MUSEUM	
COMMENT	RESPONSES
<p><i>Vashon-Maury Island Community Meeting Comment Card</i></p> <p>I am president of the Vashon-Maury Island Heritage Association. The Heritage Museum, 10105 SW Bank Road, is historic. I purchased property at 10115 SW Bank Road – also historic, in 2014. LRP is to develop campus and education center. We are interested in zoning variance to allow public use of 20225 SW Bank – built in 1910. These two buildings, originally a 1907 Norwegian Lutheran "stick built" church and parsonage (1910) were built to be together. VMIHA want to reunite them for history education for future generations.</p>	<p>Please contact the Department of Permitting and Environmental Review staff about the reuse/continued use of historic structures and applicable regulations. Call the Department at 206-296-6600 or come to our office in Snoqualmie. Also, you may wish to convey your ideas at the community meetings this spring during the Vashon-Maury Island subarea planning process.</p>

Q

R

CITY OF RENTON — SUBAREA PLANNING, AREA ZONING STUDIES	
COMMENT	RESPONSES
<i>From: Jennifer T. Henning [mailto:Jhenning@Rentonwa.gov] Sent: Wednesday, January 06, 2016 7:36 PM</i>	

CITY OF RENTON — SUBAREA PLANNING, AREA ZONING STUDIES

COMMENT

RESPONSES



January 6, 2016

Ivan Miller
 King County Comprehensive Planning Manager
 Mailstop CNK-EX-0810
 Chinook Building 401 5th Ave, Suite 810
 Seattle, WA 98104

Via email: ivan.miller@kingcounty.gov

SUBJECT: City of Renton Comments on King County 2016 Comprehensive Plan Update Public Review Draft

Dear Mr. Miller:

Thank you for accepting comments from the City of Renton regarding King County's 2016 Comprehensive Plan Update. The City of Renton supports the eight principles guiding the long-term goals and priorities: Create Sustainable Neighborhoods; Preserve & Maintain Open Space; Direct Development Towards Existing Communities; Provide a Variety of Transportation Choices; Achieve Environmental Sustainability; Address Health Disparities; Address Equity, Social, and Environmental Justice; and, Manage Performance.

The focus of the City of Renton's comments is with regard to our Potential Annexation Area (PAA). First, the Comprehensive Plan Update should include a policy that recognizes the need for joint planning and coordination with jurisdictions within the PAA.

Next, the Area Zoning Study #2 – Fairwood A (Motion 14276) and Area Zoning Study #16 Fairwood B, include statements that several phone calls were made to Renton Planning Department staff regarding these studies, without a response. In addition, there is a statement that indicates a formal letter with attachments was sent to the Planning Director on August 8, 2015, and no response was received. I apologize that it was perceived that the City was unresponsive. We do not have record or receipt of the correspondence, and have not been able to determine who was contacted at the time. In November, City staff exchanged email with County staff regarding the study areas. It has been our intent to comment, and our comments on both of the proposals are included herein.

With regard to Fairwood B – Subarea, the City has designated this as Commercial Mixed Use (CMU) on the Comprehensive Planning Land Use Map. The CMU designation is for areas with established commercial and office area near principal arterials. Residential

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Comments noted and appreciated.

King County agrees; we have revised a policy (U-208) to support joint planning with cities in PAAs and look forward to working with the city in the future.

Thank you for responding to these studies with comments in these letters.

Comments noted.

CITY OF RENTON — SUBAREA PLANNING, AREA ZONING STUDIES

COMMENT

RESPONSES

Ivan Miller
2 of 2
January 6, 2016

uses are permitted as part of a mixed-use development. The intent of these areas is to create vibrant districts and to increase employment opportunities. We support the subarea planning process and/or rezone as appropriate in order to expand the Urban Residential, High (UH) Land Use toward commercial or mixed use zoning. However, we urge that appropriate zoning be applied in order to provide a suitable transition to the abutting low density areas surrounding the study area particularly with regard to height, and setbacks.

For Area Zoning Study #16 Fairwood B, Renton has designated this area Residential Low Density (RLD). The RLD designation is for lands constrained by sensitive areas, those intended to provide transition to the rural area, or those appropriate for larger lot housing to allow for a range of lifestyles. The comparable zoning allows for densities of up to 4 dwelling units per acre; in addition assisted living facilities are allowed with the potential for densities of up to 18 dwelling units per acre. King County's recommendation is to either change the Comprehensive Plan designation from R-6 to either UH or R-18 for the northern parcel (APN 3423059035); and to retain the R-6 zoning on the other 3 parcels to the south (APN 3423059031, 3423059034, and 3423059061). Zoning that supports assisted living as a use on the northern parcel would be compatible with both the City's and the County's vision, provided critical areas are properly protected. The City supports retention of the R-6 zoning for the southern parcels.

Finally and separately from our comments regarding the Update to the Comprehensive Plan, we would like to take this opportunity to request that any street improvements within the public right-of-way planned by King County or required of private development within Renton's Potential Annexation Area be installed per City of Renton standards.

Thank you for your consideration of the City of Renton's comments. Please contact me at jhenning@rentonwa.gov or at 425-430-7286 if you would like discuss this further.

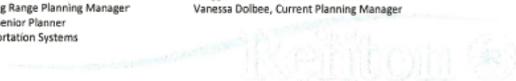
Sincerely,



Jennifer Henning, AICP
Planning Director

cc: C.E. "Chip" Vincent, CED Administrator
Angie Mathias, Long Range Planning Manager
Elisabeth Higgins, Senior Planner
Bob Mahr, Transportation Systems

Gregg Zimmerman, PW Administrator
Vanessa Dolbee, Current Planning Manager



These comments are consistent with the Area Zoning Study.

Comments noted. The policy noted above (U-208) supports working collaboratively on development standards in PAAs.

KELLY RYDER (HOUSING DEVELOPMENT CONSORTIUM) – MULTIPLE TOPICS	
COMMENT	RESPONSES
<p><i>From: Kelly Rider [mailto:kelly@housingconsortium.org]</i> <i>Sent: Wednesday, January 06, 2016 6:04 PM</i></p>	

KELLY RYDER (HOUSING DEVELOPMENT CONSORTIUM) – MULTIPLE TOPICS

COMMENT



January 6, 2016

Mr. Ivan Miller
 Comprehensive Planning Manager
 Performance, Strategy and Budget
 401 5th Ave.
 Seattle, WA 98104

RE: Housing Development Consortium (HDC) Comments on the King County Comprehensive Plan Update

Mr. Miller:

Thank you for the opportunity to comment on King County’s Comprehensive Plan update. The Housing Development Consortium Seattle-King County (HDC) greatly appreciates strong support expressed for affordable and diverse housing opportunities throughout the updated Comprehensive Plan.

HDC is a coalition of more than 100 nonprofit organizations, private businesses, and public partners committed to the vision that all people should have the opportunity to live in safe, healthy, affordable homes in communities of opportunity. In setting a framework and model for local jurisdictions across the County, this Comprehensive Plan plays a tremendous role in determining whether residents of all incomes can find affordable homes near work, school, transit, and other important services. Therefore, it is vital that the Plan includes strong, specific policy statements outlining the County’s commitment to creating, preserving, and monitoring affordable housing opportunities.

Specifically, HDC encourages you to consider the following comments as you work to finalize the Comprehensive Plan.

Serving households below 30% Area Median Income (AMI)

In 2012, the new Countywide Planning Policies (CPP) made a commitment (in Policy H2) to working individually and collectively to address the needs of households earning less than 30% Area Median Income through funding and programs. This is particularly important for serving individuals and families experiencing homelessness. **The County should focus Policy H-148 on this population or add a policy specifically underscoring the needs of this population and committing to increase capital and operating funds for affordable housing serving households who earn less than 30% Area Median Income through renewing the MIDD and Vets and Human Services Levy, enacting the sales tax authorized by HB 2263, and other strategies.**

State and federal funding will also be critical for serving this population. To that end, we appreciate the statements made throughout the Plan in support of these resources. We also appreciate support of the policy & advocacy activities required to access these funds, expressed in Policy H-158.

RESPONSES

Thank you for reviewing the plan and making comments! Now that we have created a new Chapter 4 for Housing, Health and Human Services, we have clarified a couple of things. The first is that King County only has land use powers over the unincorporated areas of the County, and can only implement specific land use regulations in those unincorporated areas, such as mandatory inclusionary affordable housing and the level of affordability required in such regulation. We have also clarified, however, that we have a regional leadership role in housing, health and human services, and will make the most of that role to encourage parallel policies across the region. The Housing, Health and Human Services chapter contains the strongest expression of King County’s regional and local unincorporated area policies in these areas, and adopts clear housing affordability goals in policies H-102 and H-103, including goals for very low-income housing for households at or below 30% of AMI. H-149 is a policy that provides the County’s commitment to work towards increasing capital and operating resources for affordable housing, especially housing for the lowest income and most vulnerable persons.

We thank you for your work on health

KELLY RYDER (HOUSING DEVELOPMENT CONSORTIUM) – MULTIPLE TOPICS

COMMENT

Healthy Housing

Thank you for your commitment to healthy, affordable housing as expressed in the Urban Communities and Housing & Human Services chapters, particularly explicit statements in support of policies that promote healthier housing such as: adopting a healthy housing code and implementing applicable inspections (H-113), relocation assistance funding (H-161), private development loans and financing for maintenance (H-162), Preservation Tax Exemption (H-141), Just Cause Eviction (H-172). In addition, the County should explore funding and supporting Community Health Workers in unhealthy homes to provide tenants with the resources they need to improve their housing conditions.

Transit Oriented Development & Moderate-Income Housing

We commend the promotion of a diversity of housing densities and types, including multi-family housing, in the Urban Communities chapter. Connected, urban centers are critical and desirable, and we must ensure a diversity of housing types are provided in these communities of opportunity. Unfortunately, in many of the County's growth centers, multifamily housing can no longer be assumed to be "affordable." In mixed-use areas near transit, for example, market-rate prices have risen dramatically. For this reason, it is critical that incentives like density bonuses in these areas explicitly support affordability for households earning below 80% of Area Median Income, not simply incentivize development generally. As the market rate in most areas is less than the median income, programs across the County should be focused on this lower income range not simply on less than median income. This holds true for urban planned development and fully contained communities. The Urban Communities chapter sets a requirement for affordability at below median income; this should be set at below 80% Area Median Income.

HDC very much appreciates the County's commitment to prioritize surplus public lands for affordable housing, as demonstrated through H-157 and developments like Velocity at the S Kirkland Park & Ride. Public resources and preferences, like those for surplus property, should be provided explicitly for those developers that commit to providing long-term (50 years or more) affordability for low-income households (at below 80% AMI).

Housing Access/Equity

HDC shares King County's commitment to fair and equitable housing, as expressed in Policy H-120. In order to achieve this goal, the County should commit to exploring two specific strategies: 1) ban source of income discrimination across all King County jurisdictions, creating market consistency and opening housing opportunities for low-income renters, and 2) remove barriers to housing for people with criminal records, who are often discriminated against in the housing market.

CPP Accountability

Finally, King County's monitoring and data capacity will be critical to holding jurisdictions accountable to the new Countywide Planning Policies housing requirements. H-106 & H-110b provide some commitment to this work. HDC urges the County to create a thorough Housing Technical Appendix that gives cities the data they need to assess their progress toward meeting the countywide housing needs.

Thank you for your consideration. Please do not hesitate to contact me with any questions.

Best,



Government Relations & Policy Director

RESPONSES

and housing intersections and have referenced community health workers more specifically in policy H-202. We would also like to clarify a jurisdictional issue with respect to fair housing law, an issue which was raised in your comments. Just as King County only has land-use powers in the unincorporated areas of the County, so does King County only have civil rights legal jurisdiction in the unincorporated areas. King County has adopted Section 8 discrimination as a protected class and enforces it in the unincorporated areas of the County, and is willing to consider other related protected class designations; we cannot, however, enforce source of income discrimination in any other parts of the County outside the unincorporated areas. Lastly, H-118 and H-120 are the appropriate policies through which we will address more specific requirements such as removing barriers to housing for persons with criminal records.

S

SIFU JOHANN SASYNUIK — SHORELINE PROTECTION	
COMMENT	RESPONSES
<p><i>From: Sifu Johann Sasynuik [mailto:johtzu@mindspring.com]</i> <i>Sent: Monday, December 07, 2015 10:57 AM</i></p> <p>Whereas - the shorelines and waterways belong to the people of the State of Washington. Whereas - these waterways have been used by the indigenous peoples as highways since time immemorial Whereas - these waterways are wildlife corridors Whereas - the levees built along the states waterways were built with Federal, State and County monies Whereas - the Top of these levees constitute the high water mark for containing these waterways King County Shall provide and maintain unrestricted access to these levees to the peoples of the state of Washington King County Shall include the tops of all the levees in King County as part of the King County Trail system King County Shall work in conjunction with Federal, Tribal, State and County governments to be the best stewards of these waterways. The peoples access to these waterways shall not be infringed and furthermore by having this access the People are better witness to the stewardship of these priceless natural resources.</p> <p>My Home and my Business sits adjacent to the Raging River in Fall City The Deed on my property shows an easement dating to 1901 - one hundred fourteen years ago !!! Back in those days the easiest way to travel the impenetrable forest was to follow the river The Snoqualmie tribe had a warriors camp at the confluence of the Raging River - The Tribal name being the Shaswabs and the Snoqualmie River. They have used the Raging river as a highway since time immemorial. My property has a levee that runs adjacent to the river built with federal state and county monies in 1939 A Pedestrian easement and right of way to the rivers edge were further added to the property when it was platted in 1985 - thirty years ago Please help teach people to better Share these priceless resources</p>	<p>Comments noted. King County agrees that shorelines, waterways and wildlife corridors are important assets to be protected.</p>

SIFU JOHANN SASYNUIK — SHORELINE PROTECTION	
COMMENT	RESPONSES
<p>Sifu Johann Sasynuik 涵江佑子 Xiong Jiang You Zi Raging River Protection Master 祭司虎山 Ji Si Fu Shan Abbot of Tiger Mountain 烏孫 Wu Sun/Grandson of Ravens 月氏 Yue Shi/Moon Clan/Scythian Kung Fu Club Fall City Issaquah Fu Shan Guan/Tiger Mountain Training Hall "Real Skills , For Life" Serving the Eastside since 1993 425-392-4712 KungFuClubIssaquah.com</p> 	

STEVE SMITH — NORTH BEND AREA ZONING STUDY	
COMMENT	RESPONSES
<p><i>From: steve@riverbendhomesites.org [mailto:steve@riverbendhomesites.org]</i> <i>Sent: Tuesday, December 22, 2015 5:58 PM</i></p> <p>Good morning, Although you have explained to me more than once, since 1994. Since the 2016 review</p>	

STEVE SMITH – NORTH BEND AREA ZONING STUDY	
COMMENT	RESPONSES
<p>came out, I still am concerned about the potential for King County working with North Bend to annex our neighborhood. And am asking for your assistance in determining if our neighborhood has been identified and included in this part of the comp plan. Referencing the Public Review Draft of 2016 Comprehensive Plan. In section C, R-510 the statement that states The cities in the rural area and their Potential Annexation Areas are part of the overall Urban Growth Area for purposes of planning land uses and facility needs.</p> <p>I understand that it is in our community's best interest not to see the negative side of this growth, but to work with the local city of North Bend for a positive outcome. What I am suspicious of (a negative outcome for us) is that King County and the City going ahead with comprehensive planning to annex our neighborhood, and then setting those plans in motion, then notifying me and my neighbors here in River bend Home sites Association after the fact with no recourse. My address is 15032 443 Ave SE, North Bend. I would like to as much as possible, participate in the preplanning, or at least be able to attend the meetings where this topic is discussed.</p>	<p>The Riverbend development is not included in the North Bend Area Zoning Study.</p> <p>Again, Riverbend is not part of the 2016 Plan update studies.</p>

ROBERT SPOONER – COUNTY PRIORITIES	
COMMENT	RESPONSES
<p><i>From: rob [mailto:robertspooner@gmail.com]</i> <i>Sent: Wednesday, January 06, 2016 11:58 AM</i></p> <p>Please consider making equity the highest priority by putting as effort as possible into:</p> <ol style="list-style-type: none"> 1. Transit - Lightrail, pedestrian, and bicycle infrastructure 2. Affordable Housing 	<p>Comprehensive Plan policies already support these issues and they are both Executive priorities and priorities in the Strategic Plan.</p>

LINDA SWARTZ - ACCESSORY DWELLING UNITS	
COMMENT	RESPONSES
<p><i>Vashon-Maury Island Community Meeting Comment Card</i></p> <p>We are interested in accommodation in the regulations for ADUs for use by family members.</p>	<p>ADU's are already in King County Code and can be pursued more aggressively on Vashon if the local residents desire to do so. DCHS would work with residents on a pilot that could result in the production of many more ADU units on the island.</p>

T

MICHAEL TANKSLEY – AGRICULTURAL LAND COUNTY CODE AMENDMENTS	
COMMENT	RESPONSES
<p><i>From: Michael Tanksley [mailto:wmtanksley@comcast.net]</i> <i>Sent: Monday, January 04, 2016 3:11 PM</i></p> <p>Pursuant to a phone conversation I had with Karen Wolf in November, I would like to submit suggestions for specific adjustments to King County's codes that would improve our ability to support the goals contained in the County's CPPs in regard to maintaining the "rural character" of our Rural Unincorporated communities.</p> <p>While these proposed changes should be self-explanatory, I will asterisk two points and offer a bit of expansion below.</p> <p>Thank you for your consideration of these proposals.</p> <p>21A.06 TECHNICAL TERMS AND LAND USE DEFINITIONS</p> <p>21A.06.040 Agricultural Product sales.</p> <p>Add a reference to alcoholic beverage sales by making the last sentence read: "Agricultural product sales do not include marijuana... nor alcoholic beverages except as an accessory to a winery/brewery/distillery per 21A.08.080."</p> <p>21A.06.605 Home industry. 21A.06.610 Home occupation.</p> <p>Amend the definition of both activities to return to the pre-2008 condition that such activities are permitted only as "... subordinate to the use of the site as the primary residence of the business owner." *</p> <p>21A.08 PERMITTED USES</p> <p>21A.08.070 Retail land uses.</p>	<p>Thank you for all of your comments on agricultural land county code amendments sent on January 4, 2016. They address definition and permitted uses for agricultural product sales, home industry/home occupation, retail land uses and manufacturing land uses (winery/brewery/distillery).</p> <p>King County has initiated a study to develop recommendations concerning the wine and adult beverage industry in the Sammamish Valley area while improving the interface of the industry with the surrounding communities. To achieve this goal, King County has hired a consultant to assist with identifying and researching issues, conducting stakeholder and broader public outreach, and developing potential policy or code recommendations in the areas of economic development, transportation, land use, and agriculture for wineries, breweries, distilleries and associated tasting rooms in the Sammamish Valley Area, and potentially, other parts of</p>

MICHAEL TANKSLEY — AGRICULTURAL LAND COUNTY CODE AMENDMENTS	
COMMENT	RESPONSES
<p>In “Retail land uses” chart, add: "Tasting rooms" to the SPECIFIC LAND USE box along with “Liquor stores” to clarify the term as being synonymous with “Liquor stores” for purposes of determining permitted uses. This would read:</p> <p>SIC# 592 Liquor stores and tasting rooms</p> <p>21A.08.080 Manufacturing land uses</p> <p>Winery/Brewery/Distillery P3 C12 in A and RA zones</p> <p>Change 3.b (wineries in the A zone) to:</p> <ul style="list-style-type: none"> - include minimum lot size - provide improved definition of primary agricultural use - retain (f.) “Sixty percent or more of the products processed must be grown in the Puget Sound counties.” ...for wineries in the A zones. <p>For the RA zones, remove 3.f (60% requirement) as a condition for a “winery” to be permitted. **</p> <p>* The purpose of this change is to narrow a loophole where a house is converted to a business establishment without maintaining “the primary use of the site as a residence.” This change would be somewhat more lenient than the associated language pre-2008 KCCP codes, which mandated that a Home Occupation or Industry was permitted in an RA, F or A zone only as accessory to the primary use of the site as a residence of the <i>property owner</i>. If the referenced change is adopted, a renter or a property owner could operate a Home Occupation or Industry as long as the site is her/his actual home.</p> <p>** Virtually no wine is currently made with grape products from Puget Sound counties. If we are to accommodate “wineries” in our RA zones, then, to be realistic, we must remove this requirement. As it is, all “wineries” in the RA zones are in violation of this requirement. Small “home occupation” wine making businesses do not have this requirement, nor do wineries in the Urban municipalities, so neither should permitted “wineries” in our RA zones. This is a different story in the A zones. We should (at least) retain the 60% requirement on our “designated agricultural resource” lands because the primary purpose of these lands is to preserve</p>	<p>unincorporated King County as appropriate.</p> <p>This study is expected to conclude by early Summer, 2016, with recommendations being transmitted to the County Council for review by mid-August. The Council may act by the end of 2016.</p> <p>The issues you have raised will be forwarded to the study consultant. As you mentioned, the County’s goals in the CPPs are to retain the rural character of our rural unincorporated communities and the outcomes and options identified in the study will help us address your comments as well as County goals.</p> <p>Additionally, the County is reviewing its code enforcement regulations. It has hired a consultant to identify best management practices and recommend new approaches to enforcement processes and procedures. The consultant’s report is expected to be completed in May, 2016; proposed code amendments to implement recommendations are expected to be reviewed by the County Council by the end of the year.</p>

MICHAEL TANKSLEY – AGRICULTURAL LAND COUNTY CODE AMENDMENTS	
COMMENT	RESPONSES
<p>agricultural resources. Considering that wineries are really an industrial food-processing activity, we should not be permitting our precious A zoned lands for this purpose <i>unless</i> they are directly supporting agricultural activities in our local region.</p> <p>A strong argument could be made that “wineries” should be permitted in the A zones only where a significant percentage of the grapes are grown on-site. There is at least one farm property in the Sammamish APD that is owned by an entity called “Albavin LLC”. It is only a matter of time before we will see farmland being converted to wineries without a significant improvement in both the codes and enforcement.</p>	

MEAGHAN TRACY – MULTIPLE TOPICS	
COMMENT	RESPONSES
<p><i>From: Meaghan Tracy [mailto:meaghantracy@gmail.com]</i> <i>Sent: Wednesday, January 06, 2016 10:08 AM</i></p> <p>Thank you for the opportunity to comment on the King County 2016 Comprehensive Plan Draft. Here are my priorities for the future of King County:</p> <p>Make King County more affordable. People should be able to live close to where they work. Parts of our County are becoming less affordable, forcing more families to move farther away from where they work, leading to significant negative social, economic and environmental impacts. We need the Comprehensive Plan to support strategies that create greater affordability near key transit centers and employment centers. It should include more funding for affordable housing, and it should include policies that increase the supply of market rate, family size, and affordable units.</p> <p>Put growth in high opportunity locations with good transit service. With the expansion of light rail and bus rapid transit, we should implement an urban communities strategy, which will help the region grow efficiently and responsibly over the next twenty years. We need to have a strategy in place so that increased growth around transit centers does not lead to displacement of people and small businesses. We should have policies, programs and investments that help people and businesses stay in their</p>	<p>Thank you for the comments regarding affordable housing. The 2016 Plan includes a new chapter on housing and human services; the policies therein have been strengthened to reflect the importance and challenges the region faces in meeting the housing need.</p> <p>The policies focus on placing growth in areas with good transit service. This means focusing growth within cities and centers and supporting transit oriented development.</p> <p>Comprehensive plan policies support multimodal transportation.</p>

MEAGHAN TRACY – MULTIPLE TOPICS	
COMMENT	RESPONSES
<p>neighborhoods if they choose.</p> <p>Keep investing in our transportation system with innovative, multi-modal strategies that will keep us moving affordably, safely and sustainably. As King County continues to grow, we must change the way that we move around or we will become mired in gridlock and increased greenhouse gas emissions. Smart, strategic use of our limited roadways will be required to keep King County moving as we add more people and jobs over the next 20 years. We need investments in bike lanes, transit and sidewalks to give people many ways to get around safely while protecting our air and our environment.</p> <p>King County must continue to be a leader in addressing climate change. We need aggressive, bold action to meet our climate goals. Our transportation, land use, capital facilities and environmental goals and policies should work together to protect our natural environment and to prevent climate change. We need to prepare for climate impacts and be sure to protect our most vulnerable residents who are most at risk.</p> <p>Protect our natural resource areas and our rural communities. King County is home to some of the most beautiful farmlands and forest lands. We need to protect these areas to ensure local food sources, wildlife habitat, clean water resources, and recreation.</p> <p>Better Protect People and Property From Natural Hazards. The Oso disaster has underscored the need to better protect people and property from landslides and other natural hazards. Recent research has shown that Oso scale landslides are more common than previously believed. Improve comprehensive plan policies and regulations to protect people and property from natural hazards.</p> <p>Work towards a more equitable future for all. Not all of our residents and communities have the same access to opportunity. The County should be proactive and intentional about advancing race and social justice through its policies, programs and investments.</p> <p>Accountability and measurement. Quantifiable goals will help us track how we are doing. We should expand our metrics and make sure that we are moving in the right direction. It is critical that our tracking and accountability not just focus on county-wide results, but also on specific populations so that no one is getting left behind.</p>	<p>Multiple chapters have been updated with policies related to Climate Change and reference the work of the Strategic Climate Action Plan and King County Cities Climate Collaboration (the K4-C).</p> <p>Policies related to landslide mapping and notification as well as emergency response have been updated and included in the 2016 Plan. The landslide policies were further refined, based on public comment, between the Public Review Draft and Executive Recommended Plan.</p> <p>Policies have been added and updated throughout the 2016 Plan related to equity and social justice; further, mapping data has been included to help explain the relationship of ESJ to the geographies of the Growth Management Act.</p> <p>Chapter 12 includes a new Workplan section that includes an Action to develop a Performance Measures Program that is specifically related to the goals, and timeframes, of the Comprehensive Plan.</p>

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W

JOHN WECHKIN (PERKINS COIE) – SEPTIC SYSTEMS, VASHON ISLAND	
COMMENT	RESPONSES
<p><i>From: Wechkin, John M. (Perkins Coie) [mailto:JWechkin@perkinscoie.com]</i> <i>Sent: Wednesday, January 06, 2016 7:40 PM</i></p> <p>I'd like to see the County consider alternatives to conventional septic systems and drain fields. In particular, I'd like to see composting toilets considered for Vashon Island, for waterfront properties and other areas where drain fields are not practical.</p> <p>As another part of a more "green" approach, I'd like to see the County consider incentive programs for commercial and residential solar energy generation and geothermal energy generation.</p>	<p>The Department of Public Health is working on its understanding of composting toilets and its ability to permit them. One problem with them is that waste solids have to be trucked to disposal sites (ie Bullitt Center).</p> <p>The Department of Permitting and Environmental Review will be proposing new solar readiness codes based on new regulations from the State Building Code Council effective July 1, 2016. DPER is also exploring a "Solarize Unincorporated King County" program (similar to previous "Solarize Bellevue" and "Solarize (insert Seattle neighborhood name)" campaigns in the last several years. We would welcome your ideas about incentives.</p>

JOHN WECHKIN (PERKINS COIE) — SEPTIC SYSTEMS, VASHON ISLAND	
COMMENT	RESPONSES

X

Y

Z

IV. COMMENTS AFTER CLOSE OF THE PUBLIC COMMENT PERIOD

General

SONJA BOWDEN — SKYWAY WEST HILL ACTION PLAN	
COMMENT	RESPONSES
<p><i>From: Sonja Bowden [mailto:sonja@vegcat.me]</i> <i>Sent: Monday, January 11, 2016 1:05 PM</i></p> <p>SWAP Critique Concerns:</p> <ul style="list-style-type: none"> • A subarea plan should be inclusive of all income groups, races, and cultures, not targeted. 	<p>Comments noted, and King County agrees with many of them. Similar issues were submitted and addressed</p>

SONJA BOWDEN – SKYWAY WEST HILL ACTION PLAN	
COMMENT	RESPONSES
<ul style="list-style-type: none"> • Input should come from all neighborhoods from the grassroots up. • The plan should be factually correct and historically accurate. • Action plans should recognize and name groups that are already engaged in those actions. • Concepts like “buy local” are nice, but aside from one grocery store, there are no businesses in Skyway. • Access to healthy foods is only half the picture. Education about foods and how to cook them comes first, and schools need to provide healthier lunches. • Low income housing and affordability are region wide problems that government needs to address. Concentration of tax-exempt housing is only as good as the tax structure that can support it. Otherwise the entire community suffers from underfunded vital public services. • The SWAP can’t force landlords to facelift their properties, and can’t force market rates for properties to remain low. • Anti-gentrification framing discourages desperately-needed investment. Skyway is a long way from worries about gentrification and displacement. There is NO new development aside from the library. • A healthy business core will support most of the goals delineated in the SWAP. • Skyway’s business districts are the most unhealthy of any urban area in S. Seattle. • As an equity and youth health matter, limits need to be set on an allowable number of retail marijuana outlets. • Public safety and code enforcement are areas of weakness that drastically need improvement. • This area will never be sufficiently served or upgraded until it’s annexed to a city. The goal should be to make Skyway financially sustainable so it’s attractive as a candidate for annexation rather than a liability. 	<p>previously; see <i>Sonja and Bill Bowden – Endorsement of Skyway West Hill Action Plan, with Caveats</i> above.</p>

FRIENDS OF NORTH SHOREWOOD PARK – SUPPORT FOR ELIZABETH GORDON COMMENTS (COMMENTS ABOVE)	
COMMENT	RESPONSES
<p><i>From: 4728 degrees [mailto:4728degrees@gmail.com]</i> <i>Sent: Sunday, January 10, 2016 8:27 AM</i></p> <p>We have reviewed comments made by Elizabeth Gordon concerning the proposed King County Comprehensive Plan. See attached. This email is to add our endorsement to her review by Friends of North Shorewood Park. Thank you for your consideration.</p> <p>Friends of North Shorewood Park, Gilbert Loring, Christine Waldman, Alexander Ruangsawat-Loring</p>	<p>Comments noted.</p>

GWENDOLYN HIGH (HIGHLANDS NEIGHBORS) – TRANSFERABLE DEVELOPMENT RIGHTS, E. RENTON PLATEAU					
COMMENT	RESPONSES				
<p><i>From: Highlands Neighbors [mailto:highlands_neighbors@hotmail.com]</i> <i>Sent: Tuesday, January 12, 2016 1:27 PM</i> <i>(Note: Due to meeting rescheduling requested by KC staff, these comments were submitted shortly after the deadline)</i></p> <p>Thanks to you and your colleagues for meeting with us on 1/5/2016. We appreciate your responses to our comments of 12/2/2015 and offer the attached feedback. We are very much encouraged by the progress we have seen and look forward to further improvements. Please let me know if you have any questions or if further clarification is needed. Also, if we have made any errors, we would be most grateful for factual correction.</p>	<p>King County appreciates the time and effort CARE has put into working on the Comprehensive Plan. Based upon the input received, King County has revised the two new TDR policies. Additionally, King County has added an action to the Workplan section of Chapter 12 to conduct a pilot study to guide future TDR amenity funding investment and TDR subarea studies.</p>				
<table border="1"> <thead> <tr> <th>Text in Public Review Draft</th> <th>King County Staff Update 1/5/16</th> </tr> </thead> <tbody> <tr> <td>Existing Policy– No changes are proposed for this update: R-319 TDRs may be used on receiving sites</td> <td>No response to CARE comments of 12/2/2015 offered.</td> </tr> </tbody> </table>	Text in Public Review Draft	King County Staff Update 1/5/16	Existing Policy– No changes are proposed for this update: R-319 TDRs may be used on receiving sites	No response to CARE comments of 12/2/2015 offered.	
Text in Public Review Draft	King County Staff Update 1/5/16				
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GWENDOLYN HIGH (HIGHLANDS NEIGHBORS) – TRANSFERABLE DEVELOPMENT RIGHTS, E. RENTON PLATEAU		
COMMENT		RESPONSES
<p>in the following order of preference as follows:</p> <ul style="list-style-type: none"> a. Incorporated Cities. Transfers into incorporated areas shall be detailed in an interlocal agreement between the city receiving the development rights and the county; b. Unincorporated urban commercial centers; c. Other unincorporated urban areas; and d. Rural Areas zoned RA-2.5, unless they are on Vashon Island, may receive transfers of development rights, but only from the Rural Forest Focus Areas. 		
<p>CARE Comments on Public Review Draft</p>	<p>GH Thoughts 1/7/16</p>	
<p>Despite the order of preference stated in R-319, King County has allowed a great number of TDRs to be transferred into unincorporated urban areas – potential annexation areas like ours – where infrastructure, amenities and services to serve this increased density do not exist, are not planned and for which there is no funding.</p> <p>R-319 used to say that the “most appropriate” location for TDRs was in Urban Centers. It clearly doesn't say that anymore. This is the specific text:</p> <p>Preference should be given to locations within designated urban centers, and to areas adjacent to transit stations and park-and-ride lots;</p> <p>That was in the 2004 and 2008 versions of the Comp Plan, but in direct contrast to the comments we offered during the 2012 Comprehensive Plan Update (when we asked</p>	<p>From our conversation, it appears that Staff consider the new proposals for subarea planning under R319a (next section) to address our siting concerns.</p> <p>We remain convinced that there should be stronger policy and code defining sites that have adequate infrastructure and services available to properly serve TDR development. The residents of the unincorporated urban area have lost important protection over the history of the existence of R-319.</p>	<p>See comment above and updated language at R-319.</p>

GWENDOLYN HIGH (HIGHLANDS NEIGHBORS) – TRANSFERABLE DEVELOPMENT RIGHTS, E. RENTON PLATEAU		
COMMENT	RESPONSES	
<p>for receiving sites to be required to meet at least half the defining characteristics of Urban Centers), in 2012 these minimal specifics of siting criteria were eliminated.</p> <p>2012</p> <p>R-319 TDRs may be used on receiving sites in the following order of preference as follows:</p> <ul style="list-style-type: none"> a. Incorporated Cities. Transfers into incorporated areas shall be detailed in an interlocal agreement between the city receiving the development rights and the county; b. Unincorporated urban commercial centers; c. Other unincorporated urban areas; and d. Rural Areas zoned RA-2.5, unless they are on Vashon Island, may receive transfers of development rights, but only from the Rural Forest Focus Areas. <p>2008</p> <p>R-319 TDRs may be made to receiving sites as follows:</p> <ul style="list-style-type: none"> a. Unincorporated urban areas. Preference should be given to locations within designated urban centers, and to areas adjacent to transit stations and park-and-ride lots; b. Transfers into incorporated areas shall be detailed in an interlocal agreement between the city receiving the development rights and the county; 		

GWENDOLYN HIGH (HIGHLANDS NEIGHBORS) – TRANSFERABLE DEVELOPMENT RIGHTS, E. RENTON PLATEAU		
COMMENT		RESPONSES
<p>c. Rural Areas zoned RA-2.5, that are not on Vashon Island, may receive transfers of development rights only from the Rural Forest Focus Areas.</p> <p>2004 R-217 Transfers of development rights may be made to receiving sites as follows:</p> <p>a. Rural areas zoned RA-2.5 may receive transfers of development rights from the Rural Forest Focus Areas.</p> <p>b. Unincorporated urban areas and incorporated cities may receive transfers of development rights.</p> <p>Preferences should be given for locations within designated urban centers, or adjacent to transit stations and park and ride lots.</p> <p>Transfers to incorporated areas shall be detailed in an interlocal agreement between the city and county.</p>		
<p>Text in Public Review Draft</p> <p>Entirely New Policy Proposal: R-319a King County should remove urban unincorporated areas as eligible TDR receiving sites for urban subdivision projects that create 10 or more new lots thru the use of the Transfer of Development Rights Program only if:</p> <p>a. the project is located in a Potential Annexation Area, and</p> <p>b. the city assigned to the Potential Annexation Area has entered into an interlocal agreement with King County</p>	<p>King County Staff Update 1/5/16</p> <p>1. Use of TDRs in urban unincorporated receiving sites</p> <p>a. Revise public review draft policy R-319a to no longer require an ILA or annexation in order to limit use of TDRs for plats in PAAs;</p> <p>i. Limit use of TDR to urban shot plats (9 lots or fewer);</p> <p>ii. A subarea plan is required to use TDRs in formal urban plats (10 or more lots).</p>	

GWENDOLYN HIGH (HIGHLANDS NEIGHBORS) – TRANSFERABLE DEVELOPMENT RIGHTS, E. RENTON PLATEAU		
COMMENT		RESPONSES
<p>to accept transfers of 75 Rural and/or Resource Lands development rights into the city, and</p> <p>c. the city assigned to the Potential Annexation Area has committed to annex its Potential Annexation Area in a timely manner.</p>		<p>See comments above and Workplan section of Chapter 12 regarding a pilot project to help answer questions such as these.</p>
CARE Comments on Public Review Draft	GH Thoughts 1/7/16	
<p>We have asked for years to have the officially defined characteristics of a formally designated Urban Center be used as the criteria for where to land any TDRs. The removal of this text is the opposite of our recommendations. The trend of placing even less policy direction (non-binding as it was) as to the appropriate place to designate TDR receiving sites is very troubling.</p> <p>No matter the negative impacts to a community that have resulted from receiving TDRs, with policy R-319A, King County officially makes it impossible to limit the use of TDRs in the urban unincorporated area – specifically Potential Annexation Areas like ours - unless the annexing city 1) has agreed to accept TDRs AND 2) the city has an additional formal agreement to “annex in a timely manner” which is above and beyond what was already agreed when the city and the county originally set the boundaries of the PAA in the first place. At present, state law sets the methods and processes allowed for annexation. The city has virtually no control over the timing. This policy makes it impossible to limit TDR receiving sites based on the actual state of infrastructure, amenity and/or service deficits that exist in every of</p>	<p>Staff offers no concrete specifics of how joint planning between the County and an annexing City could or would be executed – which is a large part of our comments of 12/2/15.</p> <p>1.a.i proposed above represents continuation of current policy as it is today – no change. Any development project that will result in 9 or fewer new lots (including TDRs) will have no additional criteria or process to determine if those TDRs fit their proposed locations. The use of TDRs will remain a “by-right” concept and no criteria by which the use of TDRs for a short plat in the urban unincorporated area will not be permitted are proposed. TDRs even in short plats should be forbidden if the site is within a travelshed that fails transportation concurrency.</p> <p>1.a.ii proposed above is <i>potentially</i> helpful. The term “subarea plan” is used throughout the public review draft, and Staff have agreed that the definition is unclear. There are distinctly different processes/depth of analysis/binding recommendations depending on the specific policy statement. This causes great concern. Staff said that they expect this</p>	

GWENDOLYN HIGH (HIGHLANDS NEIGHBORS) – TRANSFERABLE DEVELOPMENT RIGHTS, E. RENTON PLATEAU		
COMMENT	RESPONSES	
<p>King County's PAAs. CARE has been practically begging the King County and Renton to do joint planning in our PAA for a decade. In 2012 Renton sent a formal resolution to King County approved by the Planning Commission, the City Council and the Mayor asking for joint planning the PAAs. King County failed to engage productively in that conversation, so no progress has been made. We want the growth out here to be planned and deliberate. We want to be able to welcome our new neighbors with adequate infrastructure, amenities and quality urban design. The county is our local planning and permitting authority in the PAA. Under existing law, King County is the ONLY jurisdiction that can set the rules of what can be permitted here in the absence of an ILA. The residents and the city do not want more unmitigated, unplanned and unsupported higher density development where it cannot be adequately accommodated. The community perceives proposed R-319A as King County punishing the urban unincorporated communities for the county's own failure to successfully negotiate joint planning ILAs with the annexing cities.</p>	<p>will be comparable to the process that is currently used for an Area Zoning Study that is required when there is a proposed zoning change during the Comprehensive Plan Update Cycle that is proposed via docket item submission. Additionally, we attempted to clarify some other points in our conversation with Staff and learned that they are thinking:</p> <ul style="list-style-type: none"> • The subarea planning will be a public process that engages the community and the annexing city. Details of the public process need to be specified. The affected communities need to be provided with local public meetings that accommodate working schedules, and the ample opportunity to submit written comments. • Any project proposing a preliminary plat that would use TDRs would have to wait for the results of this subarea planning process that would be folded into the annual Comp Plan Update cycle (as opposed to the major 4 year cycle we are in now). • The subarea planning process would be a joint responsibility of the Department of Permitting and Environment Review (DPER) and the Regional Planning Staff inside the office of the King County Executive. • The criteria against which a proposed project was graded and the circumstances under which it would be rejected or modified are still to be determined. 	

GWENDOLYN HIGH (HIGHLANDS NEIGHBORS) – TRANSFERABLE DEVELOPMENT RIGHTS, E. RENTON PLATEAU		
COMMENT		RESPONSES
	<p>So again – this does sound better than what was originally proposed, but there are tremendous unknowns here. We offer the following recommendations:</p> <ul style="list-style-type: none"> • Details of the public process need to be specified. The affected communities need to be provided with local public meetings that accommodate working schedules, and the ample opportunity to submit written comments. • Specific evaluation criteria for the planning process must be established and apply equally to all proposals. Policy and code must clearly state the minimum characteristics and infrastructure required to approve a TDR proposal. Equally, adverse conditions, such as the site being located within a failing transportation concurrency travelshed, which would preclude approval of a TDR proposal, must also be defined. • Roles and responsibility of the King County staff in managing and reporting the planning process must also be defined and the workings of the entire process must be open and transparent to all. • The final product from the subarea planning process must be clearly definitive and state whether a TDR project will be approved or rejected. It must be a required component of any Preliminary Plat application. <p>Mitigations offered by the project</p>	<p>King County appreciates the specificity of these comments and these will be considered as the pilot project gets underway as specified in the Workplan section of Chapter 12.</p>

GWENDOLYN HIGH (HIGHLANDS NEIGHBORS) – TRANSFERABLE DEVELOPMENT RIGHTS, E. RENTON PLATEAU		
COMMENT		RESPONSES
	<p>proponents, the Hearing Examiner or the County Council at any point in the Preliminary Plat process must be reevaluated by a well-defined subarea review which must include the same level of public involvement as the initial subarea planning. In other words, the community must not be overruled by administrative or legislative declaration.</p>	
Text in Public Review Draft	King County Staff Update 1/5/16	See comments above.
<p>Entirely New Policy Proposal: R-320a If an unincorporated urban Potential Annexation Area has received 75 or more TDRs permitted into new development, King County and/or the King County TDR Bank shall provide funding for urban amenities in the unincorporated urban Potential Annexation Area commensurate to amenity funding provided to other suburban cities that have previously entered into a TDR interlocal agreement with King County. The provision of amenity funds shall be subject to terms and conditions of an adopted interlocal agreement (ILA) with the city assigned to the Potential Annexation Area, if such ILA exists.</p>	<p>2. TDR-related amenities for urban unincorporated TDR receiving areas</p> <ul style="list-style-type: none"> a. Revise public review draft policy R320a to support providing amenities to urban unincorporated TDR receiving areas at levels commensurate with those provided to TDR receiving areas in suburban cities. Remove the provision linking amenity funding to a predetermined # of TDRs in the policy. b. The type and location of amenities provided to the urban unincorporated TDR receiving areas should be informed by a public engagement process including members of the affected receiving area and available funding sources. c. DNRP Pilot project in East Renton PAA to create process and structure for TDR-amenity funding in PAAs. 	
CARE Comments on Public Review Draft	GH Thoughts 1/7/16	

GWENDOLYN HIGH (HIGHLANDS NEIGHBORS) – TRANSFERABLE DEVELOPMENT RIGHTS, E. RENTON PLATEAU		
COMMENT	RESPONSES	
<p>During CARE’s September meeting, when Bob and Darren also attended, we had once again requested that at the very least TDRs should not be allowed near or contribute more trips to existing Transportation Needs Locations or inside Failing Transportation Concurrency Travelsheds. All the TDR projects in the East Renton Plateau PAA have been within blocks of the Urban Growth Boundary and within block of and have contributed more trips to the five pre-existing, but unfunded and unscheduled, Transportation Needs Locations in our community. Two of these locations are on King County’s High Accident Locations list. One of those locations has since been annexed into the city of Renton. The problems remain at the 3 Way Stop, but King County no longer has to do anything about it and the \$200K that had been banked to address the issues there were reallocated elsewhere at annexation. We recently had a neighbor experience a medical emergency. They were stuck in traffic at the 3 Way Stop for 15 minutes as they tried to get off the Plateau and to the emergency room. Our travelshed has failed the Transportation Currency test ever since the first year that TDR projects here began to be occupied.</p> <p>In every case where TDRs have landed inside cities (the most preferred locations), King County has provided funding for infrastructure and amenities, but NONE has been provided to urban unincorporated areas. We asked for funding here, where it is desperately needed.</p>	<p>Positives:</p> <ul style="list-style-type: none"> • Staff is proposing to remove the 75 TDRs received threshold that would have made amenities/funding for the 58 we have already received impossible. • The amenities/funding conversation with the community would begin as TDRs are proposed. • East Renton Plateau PAA community would be the first place for this amenities/funding conversation and implementation would occur. <p>Again – there are a lot of unknowns. It sounds like staff is struggling to find funding sources for amenities that our community has strongly identified and necessary to address TDRs’ negative impacts.</p> <p>We request that 2.a be revised to:</p> <p style="padding-left: 40px;">Revise public review draft policy R320a to support<u>require</u> providing amenities to urban unincorporated TDR receiving areas at levels commensurate with those provided to TDR receiving areas in suburban cities.</p> <p>At the moment, the Department of Natural Resources and Parks (DNRP) is the only department to have declared commitment to participating, and their funding is mostly required to be used for storm water facilities, water quality projects, habitat restoration and</p>	

GWENDOLYN HIGH (HIGHLANDS NEIGHBORS) – TRANSFERABLE DEVELOPMENT RIGHTS, E. RENTON PLATEAU		
COMMENT	RESPONSES	
<p>In response, policy R-320 is being offered. At first reading – I think most of us were really happy to see the proposed new policy R-320. The use of “shall” in particular is very encouraging. But as always – we are so very fortunate for the neighbors who are constantly looking over our shoulders and making sure we don't miss the import details. Tom Carpenter came to the November CARE meeting prepared. He had looked up exactly how many TDRs have landed here on our hill – 58. Real world data puts some stark context around that 75 threshold number. We believe it is reasonable and just for the unincorporated area communities that have received TDRs to receive comparable amenity funding, but that is not what the proposed policy does. We would see no relief under this proposal today, and because Renton will no longer allow sewer extension to serve new subdivisions outside of city limits (the parcel has to annex first and apply under Renton), AND Renton doesn't accept TDRs - we will never receive those additional 17 TDRs that would even trigger the mitigation funding in R-320.</p> <p>Darren confirmed that our area has received far more TDRs than any other urban unincorporated area, too, so this policy really means that we can expect no prospect of amenity funding in our community or in any community that receives TDRs in all of unincorporated King County. The entire policy is moot at best and is generally perceived by our neighbors as mocking the concerns we</p>	<p>acquisition, or recreational investments. We need transportation improvements. There may be potential for collaboration and pooling of resources across departments (and <i>maybe</i> across jurisdictions), but this will be challenging. Collaboration is vital to the success of the proposed process. We request that Transportation and DPER also be required to participate in this process and that investments are included in the Transpiration Needs Report, the Capital Improvement Projects or other official planning/budgeting documents as appropriate.</p> <p>We reiterate: The nature of development inside cities and Urban Centers is so dramatically different from existing circumstances in the urban unincorporated areas where TDRs have been landing for over a decade, that it is very challenging to define a proportional funding structure that addresses the relative negative impact of TDRs in the two contrasted locations. The state of deficit in the urban unincorporated areas needs to be factored into the equations. Five extra flights of stairs means one thing to fit athlete, but it is an entirely different obstacle to a patient awaiting a heart transplant.</p> <p>Funding for amenities strictly from DNRP sources is unlikely to adequately address the most pressing needs of a community negatively impacted by the effects of any TDR project. Creative collaboration is essential.</p>	

GWENDOLYN HIGH (HIGHLANDS NEIGHBORS) – TRANSFERABLE DEVELOPMENT RIGHTS, E. RENTON PLATEAU		
COMMENT	RESPONSES	
<p>have presented since the proposal of TDRs in our community in 2003.</p> <p>Each Interlocal Agreement between King County and the various cities defining TDR usage is a little different. Most appear to have a two part amenity funding calculation.</p> <p>Part I – is basic initial funding based on the city agreeing to take some number of TDRs. For instance, in Sammamish, King County agreed to give \$375K for Sammamish to take 75 TDRs. That means an initial funding component of \$375K/75 TDRs = \$5K per TDR in amenity funding just to agree to receive.</p> <p>Part II – sets a specific share of the sale price of the TDR to be given to the city. Again using Sammamish as an example – King County agreed to give Sammamish \$20k of the sale price of each TDR. So, in Sammamish, King County gave the city Part I @ \$5K + Part II @ \$20K = \$25K for each TDR that resulted in an extra dwelling unit.</p> <p>We have heard that staff is attempting to apply comparable amenity funding calculation structures in this policy so that the cities and the unincorporated areas are treated equitably. The nature of development inside cities and Urban Centers is so dramatically different from existing circumstances in the urban unincorporated areas where TDRs have been landing for over a decade, that it is very challenging to define a proportional funding structure that addresses the relative negative impact of TDRs in the two contrasted</p>	<p>Another very slippery thing in this part of the conversation is what the amenity-dollar-value-per-TDR-received should be. Staff seems very reluctant to clarify at this time. It may be because they just haven't figured out what to propose, maybe there is still significant disagreement between the departments, or maybe they are hoping to keep things flexible until we work through this during the pilot. Regardless, until the formulas for calculating the specific financial value to be invested in a community in order to address the negative impact of TDR projects is defined, there is no way to objectively determine the appropriateness and adequacy of these policy proposals. There must be equity for King County residents. As a wise person once said:</p> <p style="text-align: center;">Equity is not making sure that everybody has shoes. Equity is when everybody has shoes that fit their body <u>and</u> their use.</p> <p>We request that the formulas be defined at the highest possible policy level and as soon as possible. We reiterate our previous comments in the column to the left.</p>	

GWENDOLYN HIGH (HIGHLANDS NEIGHBORS) – TRANSFERABLE DEVELOPMENT RIGHTS, E. RENTON PLATEAU		
COMMENT		RESPONSES
<p>locations. The state of deficit in the urban unincorporated areas needs to be factored into the equations. Five extra flights of stairs means one thing to fit athlete, but it is an entirely different obstacle to a patient awaiting a heart transplant.</p> <p>Additionally, unlike every ILA city, there no maximum number of TDRs defined for King County’s urban unincorporated areas, so there should be no threshold number before amenity funding is triggered. Each TDR should carry its own mitigating amenity funding. Since King County has set no maximum number of TDRs to be placed in the urban unincorporated areas, it is not possible to do the same Part I calculation that was applied in the ILAs:</p> <p>(Max # of TDRs)/(pot of initial incentive to receive) = base amenity funding per TDR</p> <p>It is also unclear what specific mechanism has been used to reach the Part II numbers recorded in ILAs. We would like to see the very specific calculations by which Part I & II amenity funding numbers have been determined for the cities, but without that information, we propose that the amenity funding per TDR to be provided in urban unincorporated areas should be at least \$25K per TDR. Especially since the unincorporated areas have significantly less infrastructure, amenities and services, the negative impacts experienced in urban unincorporated areas is much higher than inside cities (or better yet – Urban Centers), so it seems logical that the</p>		

GWENDOLYN HIGH (HIGHLANDS NEIGHBORS) – TRANSFERABLE DEVELOPMENT RIGHTS, E. RENTON PLATEAU		
COMMENT		RESPONSES
<p>amenity funding should actually be higher in order to adequately accommodate this unplanned growth. For instance, in cities, inside Urban Centers, or adjacent to transit facilities, TDR impacted residents have the option of taking transit as the traffic is impacted by the extra density. Our urban unincorporated communities don't have that option. Regardless of the urgency of the trip, we are stuck in our vehicles in the gridlock.</p> <p>While we live in hope that someday policies will be adopted that will result in mitigation for the impacts of the TDRs already received, seeing this first proposal toward that end has highlighted to us that there must also be an open and public process by which these hoped-for future amenity funds may be fairly allocated to projects that the impacted community determines to be most necessary. We have seen no such proposal.</p>		
Text in Public Review Draft	King County Staff Update 1/5/16	
	<p>3. Traffic Concurrency a. NEW: Minor policy update to R-323(b) to clarify that the intent of the traffic concurrency policy is to reduce traffic impacts in rural travel shed over time by permanently removing development potential.</p>	
CARE Comments on Public Review Draft	GH Thoughts 1/7/16	
	<p>CARE did not offer any written comments on this issue, but we know that others of our neighbors have submitted written comments and testimony on the issue for some time.</p>	

GWENDOLYN HIGH (HIGHLANDS NEIGHBORS) – TRANSFERABLE DEVELOPMENT RIGHTS, E. RENTON PLATEAU		
COMMENT		RESPONSES
	<p>The basic issue is that R-323(b) allows a person who wants to build in the Rural Area but who can't because their travelshed is failing Transportation Concurrency can buy TDRs inside that same travelshed, use it in that same travelshed and be exempted from the Transportation Concurrency restriction. Staff told us that this provision has never been used, that there is little land that can ever receive these TDRs (lots must be zoned RA2.5 which means lots have to be at least 2.5 acres), and the TDR sending sites specified for this exemption option have proven more expensive than any builder is willing to spend.</p> <p>CARE has not spent much time or attention on this issue, but in principle we are opposed to all policies that allow a builder to borrow against the future in order to be allowed a loophole that makes things worse today with no specific plan or funding to address the infrastructure deficit that exists today and which will be further intensified by utilization of this loophole.</p>	<p>See comments at Carpenter, above, regarding this. King County continues to support this provision as a way to reduce the overall development in rural areas.</p>
Text in Public Review Draft	King County Staff Update 1/5/16	
	<p>4. Joint Planning in PAAs a. Revise public review draft policy U-208 to add TDR to the list of land use tools to be considered in planning process.</p>	
CARE Comments on Public Review Draft	GH Thoughts 1/7/16	
	<p>We don't see any functional change to this proposal. It just puts a spotlight on the TDR program.</p> <p>We do, however, strongly support joint</p>	

GWENDOLYN HIGH (HIGHLANDS NEIGHBORS) – TRANSFERABLE DEVELOPMENT RIGHTS, E. RENTON PLATEAU		
COMMENT		RESPONSES
	County/City land use planning in the PAAs, so we will continue to support progress on this issue in the Comp Plan updates and more broadly.	Concur.
Final CARE Comments on Public Review Draft	King County Staff Update 1/5/16	
In addition to the comments above, once again, we offer our previous recommendations that, with minor modifications to bring them up to date, are most meaningful to address our community's experience: <ul style="list-style-type: none"> • Development proposals that have been submitted as rezones and subsequently denied must not be approved if resubmitted as TDR applications. • TDRs must be forbidden in Potential Annexation Areas unless there is an adopted joint planning Interlocal Agreement and associated development plan with the annexing city that specifically addresses the appropriate mitigation, location and design for TDR projects in accordance with the adopted Codes and Policies detailed above in this document. • TDR projects must not be approved that contribute trips to any location on the King County Transportation Needs Report, High Accident Location List, or are within 10 blocks of the Urban Growth Area. 	<p>No response to CARE comments of 12/2/2015 offered.</p> <p>The list to the left has been presented to King County at every opportunity in the long TDR conversation in which CARE and the community of the East Renton Plateau PAA have engaged. This list is the most succinct representation of our concerns and our most intense needs regarding TDRs. We submitted this same list during the 2012 Comp Plan update, and it will continue to guide our responses on these matters.</p> <p>We recommend this list as the starting place for the definition of evaluation criteria to be applied in the TDR subarea planning.</p>	<p>Comments noted. This letter raises important issues that should be discussed, even if not all will be agreed upon, the future work on TDR subarea studies and the proposed pilot project.</p>

GWENDOLYN HIGH (HIGHLANDS NEIGHBORS) – TRANSFERABLE DEVELOPMENT RIGHTS, E. RENTON PLATEAU		
COMMENT	RESPONSES	
<ul style="list-style-type: none"> • Proposed project sites must meet at least 1/2 of the characteristics that define an Urban Center as adopted in the Countywide Planning Policies. • No TDR project shall be approved that does not: <ul style="list-style-type: none"> ○ have a walkable site plan, and ○ have walkable access to transit service with all day in- and out-bound weekday routes as well as weekend service, and ○ allows public access to on-site the recreation facilities otherwise required by code. • All Urban Unincorporated Area TDR receiving sites must receive amenity investment comparable to amenity funding guaranteed in TDR ILAs. <p>We would very much appreciate an opportunity for conversation on these past recommendations.</p> <p>The consensus on the East Renton Plateau of the overall impression of the proposed TDR updates is that the clear trend in King County policy is exactly opposite of our community's feedback. If I were to attempt to reduce the current proposals into simplest possible terms as we perceive then, I would say:</p> <ul style="list-style-type: none"> • TDRs no longer have any receiving site guidance in unincorporated urban areas • Mitigating amenity funding in 		

GWENDOLYN HIGH (HIGHLANDS NEIGHBORS) – TRANSFERABLE DEVELOPMENT RIGHTS, E. RENTON PLATEAU		
COMMENT		RESPONSES
<p>unincorporated urban areas will not be provided</p> <ul style="list-style-type: none"> • King County wants unlimited future TDRs to be received in our community <p>Our community is no longer willing to continue to “take one for the team.” We understand, and broadly support, that the primary intent of the TDR program is to preserve open space in the rural area that benefits us all, but it is not a question of “preserve the rural area” OR “plan and manage growth effectively in the urban unincorporated area.” Under state law, King County is responsible for both, and that is what the residents deserve, pay for and expect. The balance has been tilted firmly in favor of the rural area, in regards to TDRs, since the creation of the program. Our communities have earned the right to mitigation and planning. That is what we are earnestly requesting for the third Comprehensive Plan Update in a row.</p> <p>We look forward to continued conversation as well as factual correction and elaboration as warranted.</p> <p>Thank you for your time and consideration, Gwendolyn High President CARE – Community Alliance to Reach Out & Engage</p>		

LIZ GIBA – NORTH HIGHLINE	
COMMENT	RESPONSES
<p><i>From: Liz Giba <liz_giba@comcast.net></i> <i>Date: January 8, 2016 at 4:17:11 PM PST</i></p> <p>As a resident of the unincorporated area of North Highline, I am concerned about housing policy. Where we live affects every aspect of our lives, from stress levels to education to family wealth (or lack of family wealth) to life expectancy. I hope that the final version of the Comprehensive Plan will incorporate some long overdue changes in the way King County deals with housing, concentrated poverty, racism and economic mobility. The attached reports include numerous strategies.</p> <p>The people of North Highline have been victims of segregation, both economic and racial, for decades. In 1970, the median income of households in the White Center neighborhood of North Highline was approximately \$1,000 less than the county's household median income. By 2013, the income gap had grown to almost \$30,000. It is even larger for families. The concentration of poverty in North Highline as well as many places, such as Ferguson, Missouri, is the result of policies that support racial and economic segregation. The introduction to the attached report "An Opportunity Agenda for Renters" ("Opportunity Agenda") says it well:</p> <p style="padding-left: 40px;">"...deeply rooted patterns of residential segregation have created a situation in which where people live depends in large part on their income, race and ethnicity."</p> <p>King County's Equity and Social Justice Agenda acknowledges the problem. Unfortunately, many leaders seem to believe that the county can meet its responsibilities through programs that throw money at symptoms. This reality is obvious in North Highline, where millions of dollars have been spent by organizations such as the Annie E. Casey and Gates Foundations and Starbucks while poverty has become more and more concentrated.</p> <p>Too many people think the "Rat City" nickname is one of the best things White Center has going for it. This is 2016, not 1994. It is time to honestly, openly and critically evaluate past policies and practices and do a major overhaul of the Comprehensive Plan.</p> <p>The Opportunity Agenda recognizes that changes are required at all levels of government. Accordingly,</p>	<p>Thank you so much for your comments. We agree with your comments and apologize that the draft was hard to wade through with all of the redlining but we have amended policies and added policies specifically to address equity issues in King County that have impacted a number of communities, including White Center (see e.g. H-110,118,124,155,201-208 and ED-101,211a&b,302,303).</p> <p>A number of White Center stakeholder organization and agency partners applied for and received designation as one of three place-based sites in "Communities of Opportunity", a program of King County and the Seattle Foundation. This will be multi-year effort with ambitious goals for policy and system change, and we look forward to engaging more partners as implementation work begins.</p>

LIZ GIBA – NORTH HIGHLINE	
COMMENT	RESPONSES
<p>its recommendations are directed to federal and state governments as well as local jurisdictions. Where the county can exert influence on other jurisdictions, entities and organizations to achieve equity and social justice, it should.</p> <p>I believe the attached report produced in October, 2015 by The Urban Institute, "Housing Policy Levers to Promote Economic Mobility" will be a helpful resource in this process. To quote the authors:</p> <p>"In a time of increasingly constrained resources, understanding what investments best create communities of opportunity is vital. Through this paper, we aim to better equip researchers, policymakers, and practitioners for conversations about the links between housing policy and economic mobility. In particular, we focus on the housing policy levers that can be used to provide greater opportunity to lower-income households, particularly people of color who have been disadvantaged over generations. Although we focus on low-income households, many middle-income households will benefit from these policies as well."</p> <p>King County is not solely responsible for the concentration of poverty and lack of opportunity that affects our neighborhood. However, King County has the responsibility and opportunity to lead the region with a just and equitable approach to planning. I look forward to seeing these and other new strategies in the next Comprehensive Plan.</p> <p>Unfortunately, because of its length and redlined format, the 2016 Update Public Review Draft King County Comprehensive Plan is very cumbersome and difficult to use. Please try another approach in the future. Seattle's 2035 Comp Plan breakdown appears much more user friendly.</p> <p>I hope you find these comments helpful. If you have any questions, please feel free to contact me. Thank you.</p> <p>Attachments:</p> <ul style="list-style-type: none"> – <i>Housing Policy Levers to Promote Economic Mobility.</i> Urban Institute. Pamela Blumenthal, John McGinty. October 2015. – <i>An Opportunity Agenda for Renters: The Case for Simultaneous Investments in Residential Mobility and Low-income Communities.</i> Center for American Progress. David Sanchez, Tracey 	

LIZ GIBA – NORTH HIGHLINE	
COMMENT	RESPONSES
<p>Ross, and Julia Gordon, with Sarah Edelman, Michela Zonta, and Andrew Schwartz. December 2015.</p> <ul style="list-style-type: none"> – <i>Executive Summary - North Central West Seattle - Area 048 - Annual Update: Characteristics Based Market Adjustment for 2014 Assessment Roll.</i> King County Department of Assessments. 	

UDOMCHAI -GEORGE LERTKANTITHAM – SNOQUALMIE INTERCHANGE AREA ZONING STUDY	
COMMENT	RESPONSES
<p><i>From: Lertkantitham, Udomchai -George [mailto:george.lertkantitham@pse.com]</i> <i>Sent: Wednesday, January 13, 2016 10:30 AM</i></p> <p>Thank you for getting back to me regarding 2016 Comprehensive Plan Update.</p> <p>We are very disappointed to learn that the County denied the Snoqualmie Interchange North of I-90 for a possible expansion of the urban growth area.</p> <p>We purchased the property in 1985 and half of the property that we purchased was zoned “COMMERCIAL” The “Commercial” zoning was taken away from us in order to accommodate Snoqualmie Ridges Phase II. The down zone of our property was all negotiated behind the close door between King County, City of Snoqualmie and Weyerhaeuser Company and we were not a part of the negotiations team.</p> <p>It is very painful to learn the fact that as a small investor like us appear to have no chance of competing or succeed because of the current political system and environment. It makes you want to give up but we all work too hard especially for the last 30 years to give up now.</p> <p>It just does not make sense that the property as located on a major I-90 and Highway 18 still undeveloped. It is just a complete lost for all parties. Loss of tax revenue. No new job created. In the</p>	<p>Comments noted, and King County appreciated the opportunity to meet with you as well as with staff from the City of Snoqualmie a couple of weeks before the Public Review Draft was released.</p> <p>King County continues to believe this property is not appropriate for urban development for the reasons noted in the Area Zoning Study.</p> <p>We appreciate your positive approach. The County is interested in continuing to work with the City and the surrounding property owners under the existing land use</p>

UDOMCHAI -GEORGE LERTKANTITHAM – SNOQUALMIE INTERCHANGE AREA ZONING STUDY	
COMMENT	RESPONSES
<p>means time the property is just sit vacant, it could have been developed to a “Park & Ride Garage with Affordable Housing above”; retirement and/or nursing home to compliment Snoqualmie Valley Hospital across the street from the subject property. Please note that all the major utilities are already exist on the roadway in front of the subject property.</p> <p>30 years is a long time!</p>	<p>framework.</p>

East Cougar Mountain Potential Annexation Area

LORI BENNETT – E COUGAR MTN. PAA	
COMMENT	RESPONSES
<p><i>East Cougar Mountain Potential Annexation Area Comment Card – January 28, 2016</i></p> <p>I am the current treasurer of the Edgehill Water Association, which serves 39 households (40 actual connections) to the three well system mentioned in the Community Meeting. Our privately managed, aging water system is a continual source of stress for all boardmembers and neighbors alike. We are an all-volunteer organization struggling to maintain and extend our water system in the face of increasing costs and legislation. I think I can speak for our entire Edgehill Water Association members when I say that our primary goal is to ensure that all the 38 households involved have some sort of backup plan in the case of system failure.</p> <p>We, as a board, have petitioned both the cities of Issaquah and Bellevue about possible incorporation into their municipal water systems, but to little interest. Our greatest fear is that we will be abandoned in the case of a system failure. I would be happy to speak further with any parties about upcoming annexation plan as they pertain to our group.</p>	<p>Comments noted. Responses to some of the issue raised herein can be found in the Meeting Summary for the East Cougar Mountain Public Meeting, shown in the following section of this report.</p> <p>As shown in the East Cougar Mountain Area Zoning Study, the recommendation in the Executive Recommended 2016 Plan is for King County to move the urban growth area boundary for a part but not all of the potential annexation area. The</p>

LORI BENNETT – E COUGAR MTN. PAA	
COMMENT	RESPONSES
	<p>parts that are already developed face complex service access and delivery issues were the whole area to become a permanent "rural island"; this is not well aligned with GMA goals and County revenue sources. That said, King County is committed to continue this discussion with residents, the City of Issaquah and the City of Bellevue.</p>

TOM CARPENTER – E COUGAR MTN. PAA	
COMMENT	RESPONSES
<p><i>From: Tom [mailto:TDCarp@comcast.net]</i> <i>Sent: Wednesday, February 03, 2016 7:07 AM</i></p> <p>NORTH COUGAR MTN PAA</p> <p>Living in the PAA east of Renton, I have no dog in the fight. However, I do care about the process the city and county are using to make a decision regarding Issaquah’s stated intent for the area.</p> <p>PAA/ANNEXATION WAKE-UP CALL King County and the cities need to see this situation as a wake-up call regarding the PAAs and annexation.</p> <p>For too long, the county has treated these areas as cash cows, without equitable service levels, and the cities can easily see them as financially undesirable, which leads to what’s happening, not just in the N. Cougar Mtn PAA, but also in other PAAs, like those for the City of Renton.</p>	<p>Comments noted; see response at <i>Lori Bennett</i> above.</p>

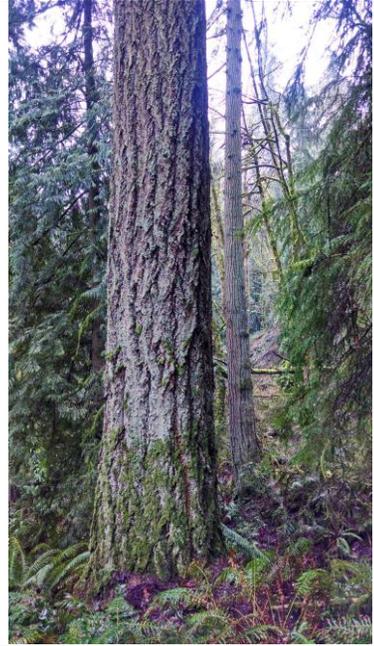
TOM CARPENTER – E COUGAR MTN. PAA	
COMMENT	RESPONSES
<p>DO RURAL ISLANDS HAVE A PLAN? Assuming this is one of only a very few “rural islands” in King County, it seems appropriate for the county to look at its best use while respecting the possible challenges residents in the island may face.</p> <p>CITY OF ISSAQUAH The City of Issaquah taking the stand it did regarding this PAA is a bit disappointing. It appears to be dumping the problem on King County because of the economics of annexing the area.</p> <p>There was talk about it didn’t fit the city’s growth strategy (e.g. focus on the current land use in the urban core, replacing single story strip malls, getting agreement from the PSRC to designate the city’s core as [Regional Growth Center]).</p> <p>However, that’s just another way of saying we have no money to support even basic services, like roads. This is from a city that has some culpability for the congestion on Issaquah-Hobart Rd.; a city that is unwilling to be part of the solution to the rural road funding in the county.</p> <p>I encourage the county to actively engage with all cities that have PAAs to “fish or cut bait”. My assumption is that none of the remaining PAAs are “financially attractive” to a city.</p> <p>SUBAREA PLANNING This may be another reason to question the criteria used to priorities subarea planning. Working in areas with PAAs may be an important part of the criteria.</p>	<p>This is not the only "rural island" in the County and, as noted in the response to Lori Bennett above, there are challenges to the County if it creates additional permanent rural islands.</p> <p>Commented noted. See previous response about the Chapter 12 Workplan item related to the potential annexation areas map and annexation countywide planning policies.</p> <p>Comment noted.</p>

STEPHEN COBERT — E COUGAR MTN. PAA	
COMMENT	RESPONSES
<p><i>From: Stephen Cobert [mailto:stephencobert@comcast.net]</i> <i>Sent: Thursday, January 28, 2016 9:28 AM</i></p> <p>To whom this may concern:</p> <p>Thank you for the civil and informative meeting at Issaquah City Hall on 1/27/16 regarding the East Cougar Potential Annexation Area. In a previous correspondence I expressed my wishes to see the PAA remain rural. This correspondence specifically addresses issue related to Parcel 9011.</p> <p>At the meeting on 1/27, two members of the family who own parcel 2011 spoke on behalf of having their 2.5 acre parcel excluded from the PAA decision so that their parcel could be annexed by the City of Issaquah. Parcel 9011 is the narrow 2.5 acre rectangular parcel that projects out to the east from the PAA and is just north of Harvey Manning Park.</p> <p>I believe that parcel 9011 should be included in the PAA decision and remain rural for the following reasons:</p> <ol style="list-style-type: none"> 1. Parcel 9011 has challenging topography similar to other parcels in the PAA. There is a deep wetland ravine that traverses the western 1/3 of the property and the north edge of the property contains steep slopes and ravines. The property is also currently covered with mature forest. 2. There is currently no road access to the property. Potential road access would necessitate building a new road through the City of Issaquah property known as Harvey Manning Park. 3. There are currently no utilities serving the parcel. Utility service would have to be put in place at Issaquah tax payers' expense. 4. Parcel 9011 is 90% surrounded by land that will never be developed. At the 1/27 meeting, the owners of 9011 were under the mistaken belief that their parcel would eventually be surrounded by development. That is not true. To the north is parcel 9010 which is slated for permanent open space as part of the Bergsma project development. The Bergsma developers excluded 9010 from their development plan because it was full of steep slopes, wetlands and ravines and had no development potential. To the south is Harvey Manning Park. This is public land owned by the City of Issaquah. About 50% of the land in Harvey Manning Park bordering 9011 is mature forested landscape. The other 50% is open grassy area and play equipment. To the west is parcel 9097 which is owned by King county and is part of Cougar Mountain Park. 	<p>Comments noted; see general response at <i>Lori Bennett</i> above.</p> <p>Comments noted regarding this policy. The property owners are exploring options with the City to have the parcel annexed into the City, similar to the adjacent parcels that were recently annexed.</p> <p>The Area Zoning Study recommends that this parcel be returned to rural, for similar reasons to those noted in this comment.</p> <p>The parcel would need to be annexed to the City before the Comprehensive Plan is adopted, or the Area Zoning Study recommendations revised during the adoption process, or the parcel would be ineligible for annexation.</p>

STEPHEN COBERT — E COUGAR MTN. PAA	
COMMENT	RESPONSES
<p>The only section of 9011 that will eventually be bordered by development is the short eastern boundary which will be bordered by 3.5 building lots in the Bergsma development if that project is ever approved. Link to Bergsma proposal:</p> <p>http://products.issaquahwa.gov/ActiveProjects/PP16-00001/PP16-00001%20Plan%20Set.pdf</p> <p>5. A casual glance of the PAA map might lead one to believe that parcel 9011 projects outward from the rural wildlands of the Precipice portion of the PAA. In reality, parcel 9011 is in the heart of the wildland since properties to the north, south and west are permanently protected natural areas.</p>	

STEPHEN COBERT — E COUGAR MTN. PAA	
COMMENT	RESPONSES
<p><i>From: Stephen Cobert [mailto:stephencobert@comcast.net]</i> <i>Sent: Thursday, January 28, 2016 9:45 AM</i></p> <p>To Whom This May Concern:</p> <p>I am writing to those involved in the creation of the King County Comp Plan to keep the East Cougar Potential Annexation Area (PAA) in King County and not advocate for annexation to the City of Issaquah or Bellevue. The PAA should remain rural.</p> <p>I have been an avid hiker in this area for the past 21 years. I have hiked throughout the Issaquah Alps but Cougar Mountain is my favorite area. The Precipice is the very steeply sloped area just north and east of Cougar Mountain Park which contains privately owned, undeveloped parcels that are located in the eastern third of the PAA. I have hiked through this area dozens of times and have gone on several off trail expeditions to discover some amazing untouched virgin forests that you just don't find anywhere else in the Puget Sound area. The Precipice is the wildest and most beautiful area in all of the Issaquah Alps. Because of the very steep topography and extensive wetlands, the loggers intentionally skipped over this</p>	<p>Comments noted; see general response at <i>Lori Bennett</i> above.</p>

STEPHEN COBERT — E COUGAR MTN. PAA	
COMMENT	RESPONSES
<p>area while the rest of Puget Sound was essentially completely logged. This area is a true rarity. The area contains dozens of large fire scarred Douglas Fir trees and Cedar that exceed 5 feet in diameter.</p> <p>This area should remain rural. The very steep topography, deep ravines and extensive wetlands make the area inappropriate for high density development.</p> <p>The attached photos were all taken from the Precipice portion of the PAA.</p>	<p>Thank you for providing photographs of the area.</p>
 <p>The image consists of three vertical photographs showing a forest scene. The left photo shows two large, textured tree trunks in the foreground with green ferns at their base. The middle photo shows a dirt path winding through a forest with a person and a dog standing on it. The right photo is a close-up of a large tree trunk with a dog sitting at its base.</p>	

STEPHEN COBERT — E COUGAR MTN. PAA			
COMMENT		RESPONSES	
			

STEPHEN COBERT — E COUGAR MTN. PAA

COMMENT



RESPONSES



PETER EBERLE – E COUGAR MTN. PAA	
COMMENT	RESPONSES
<p><i>From: PETER EBERLE [mailto:mtcphe@msn.com]</i> <i>Sent: Thursday, February 04, 2016 8:32 AM</i></p> <p>In light of the recommendations from the Bridges and Roads task force I suggest the following. The city of Issaquah's request to move the urban growth boundary to eliminate the PAA from any further annexation should be denied. Issaquah or Bellevue are both better able to provide services to residents at minimal costs while protecting the character of the neighborhood. King County needs to work harder to divest itself of these urban islands. This is just another reason that the 60% annexations need to be limited as the cities love to take the low hanging fruit and leave the rest to the county to service at higher cost.</p>	<p>Comments noted; see general response at <i>Lori Bennett</i> above. The response addresses some of the issues noted in this comment letter.</p>

DEREK FRANKLIN – E COUGAR MTN. PAA	
COMMENT	RESPONSES
<p><i>East Cougar Mountain Potential Annexation Area Comment Card – January 28, 2016</i></p> <p>Question/Concern re: services with this change. Utilities and also public safety. KC Sherriff versus Bellevue Policy Department have very different response times. Facing rampant property crimes and mail theft along SE 60th Street. Also, own artesian well for 1 neighbor (water info helpful). Last question: what happens if zoned 1 home per 5 acres to existing vacant 1-2 acre lots (we own) in terms of development potential.</p>	<p>Comments noted; see general response at <i>Lori Bennett</i> above. Responses to some of the issue raised herein can be found in the Meeting Summary for the East Cougar Mountain Public Meeting, shown in the following section of this report.</p>

TONI LETENDRE – E COUGAR MTN. PAA	
COMMENT	RESPONSES
<p><i>From: letendret . [mailto:letendret@gmail.com]</i> <i>Sent: Wednesday, February 03, 2016 1:01 PM</i></p> <p>I would like to voice my concerns about the East Cougar Mountain PAA. I live in Talus, and have closely followed the developments of parcels 7, 8 and 9. I am especially concerned about parcel 7 because of the huge retaining wall and the steep and curvy access road. The PAA would allow more construction at the north end of parcel 7, and the only access would be through Shangri-La and Talus Drives. The connecting road through parcel 7 only provided a sidewalk on one side with limited parking that makes it inadequate for much through traffic. If more homes are added on the north end it could entail problems for school buses, fire services and vendor support for construction.</p> <p>The Talus development agreement did not anticipate this extension, and even the development of parcel 7 was not consistent with the intent of following the terrain and avoiding steep slopes. If the area north of parcel 7 were to be developed it would be doubling down on an already shaky plan and would saddle Talus residents with even a greater burden of maintaining this impractical area. The city of Issaquah should also take notice as it would become even more important to keep the steep road into parcel 7 navigable in the winter.</p>	<p>Comments noted; see general response at <i>Lori Bennett</i> above.</p> <p>Comments noted regarding the Talus development.</p>

DAVID KAPPLER (ISSAQUAH ALPS TRAIL CLUB) – E COUGAR MTN. PAA	
COMMENT	RESPONSES
<p><i>From: david kappler [mailto:davidkappler@hotmail.com]</i> <i>Sent: Monday, February 01, 2016 3:08 PM</i></p>	

DAVID KAPPLER (ISSAQUAH ALPS TRAIL CLUB) – E COUGAR MTN. PAA

COMMENT



The Honorable Dow Constantine
King County Executive
King County Chinook Building
401 5th Ave, Suite 800
Seattle, WA 98104

Re: Request for King County to remove East Cougar Mountain from Issaquah's Potential Annexation Area (PAA) by moving the Urban Growth Boundary to Issaquah's City Limits

Dear Executive Constantine:

The Issaquah Alps Trails Club fully supports the request by the city of Issaquah to remove the lands in the East Cougar Potential Annexation Area from an urban growth area designation. Mayor Butler cites King County Countywide Policy DP-18 and we agree with the city's assessment that all the criteria are met for making a change from urban to rural.

Since our inception in 1979 we have supported urban villages in Issaquah and have opposed trying to convert our rurally developed areas or areas dominated by critical areas into urban areas.

Issaquah has committed to a great deal of future growth. The planned growth is where services, utilities and transportation facilities exist or can be most efficiently and sustainably provided. We were very pleased to hear from many residents of the PAA that they support a rural designation for their property and do not think an urban designation is appropriate.

Sincerely,

David Kappler
David Kappler
Vice President, Advocacy
425-652-2753

RESPONSES

Comments noted; see general response at *Lori Bennett* above.

LORI BENNETT – E COUGAR MTN. PAA	
COMMENT	RESPONSES
<p><i>From: KAUTILYA LANBA [mailto:Kautilya.Lanba@fracton.us]</i> <i>Sent: Thursday, January 28, 2016 12:41 PM</i></p> <p>First of all thank you for hosting the town hall meeting on the 27th to over the plans ref to leaving the area as Rural and not make it part of the Urban annexation plan with City of Issaquah.</p> <p>I have a lot (1924069063) which fall in this plan of being removed from the Issaquah annexation plan. As I plan to build a house on it this year. I would like to understand how this will impact me in terms of applying for building permit and are their anything I need to be aware as part of this plan. Right now the lot is part of un-incorporated King County.</p> <p>This part of the property and the surrounding area is very flat and has houses already built. It will be good to understand how the boundary of Annexation plan was drawn.</p> <p>Anything which can be shared will be highly appreciate it.</p>	<p>Please see the Meeting Summary for this meeting which provides answers to this question. And, please see the East Cougar Mountain Area Zoning Study that recommends that some parcels be removed from the Urban Growth Area. Your parcel is not recommended for removal.</p>

NINA MILLIGAN – E COUGAR MTN. PAA	
COMMENT	RESPONSES
<p><i>From: Nina Milligan [mailto:nina.milligan@gmail.com]</i> <i>Sent: Wednesday, January 27, 2016 11:13 AM</i></p> <p>I would like to express support for removing East Cougar Mountain from the UGA, for moving the line back to Issaquah's current city limits.</p> <p>Steep slopes and hydrology make the area unsuitable for urban development. Limited access makes it inappropriate for urban infrastructure to be installed.</p>	<p>Comments noted; see general response at <i>Lori Bennett</i> above.</p>

NINA MILLIGAN – E COUGAR MTN. PAA	
COMMENT	RESPONSES
Issaquah plans for all its future growth to take place in Central Issaquah, or better yet, its Regional Growth Center. Growth outside the city limits is inconsistent with the city's Comprehensive Plan.	

DEREK FRANKLIN – E COUGAR MTN. PAA	
COMMENT	RESPONSES
<p><i>From: Jo-Ellen Smith [mailto:cloudcnr@comcast.net]</i> <i>Sent: Monday, February 01, 2016 8:44 AM</i></p> <p>Dear King County, I attended the meeting in Issaquah on 1/27 on the East Cougar Mt. PAA.</p> <p>I am very concerned that this PAA is being rushed through as a “tack-on” to the upcoming Comp Plan without adequate consideration for the implications on homeowners in the area.</p> <p>It was clear from the meeting that County representatives did not have well thought-out answers for residents on what the change to a ‘Rural’ designation would mean, nor what the impact is on the infrastructure for the area. Failing roads (zoo hill/Klein Hill) are a major concern and we know that the County budget for roads is woefully inadequate.</p> <p style="padding-left: 40px;">King County Roads Director Brenda Bauer has written to us and said: ““it is difficult to sustain roads built some time ago in challenging terrain; failures on steep slopes would be a significant cost to resolve, and the terrain may not allow for capacity improvements.”</p> <p>Other infrastructure, like police/sheriff office coverage, is also a concern. There has been an uptick in property crime in the area in the last year. The sheriff’s office has communicated to residents that we are basically on our own when it comes to protecting our property because they are understaffed.</p>	<p>Comments noted; see general response at <i>Lori Bennett</i> above.</p> <p>The recommendation is to address the area in more than one phase, based upon the conditions currently on the ground, and the need for additional dialogue with the community, the City of Issaquah and the City of Bellevue.</p>

DEREK FRANKLIN — E COUGAR MTN. PAA	
COMMENT	RESPONSES
<p>Residents should be provided with more information about the impacts of the proposed PAA change, and be provided with a longer time frame to comment, before a recommendation is made.</p> <p>Thank you for your consideration.</p> <p>Comments made on behalf of the Cougar Mountain Residents Association, a non profit corporation in the State of Washington. We represent homeowners in the SE 60th St. corridor in both Bellevue and King County.</p>	

ED MEYER — E COUGAR MTN. PAA	
COMMENT	RESPONSES
<p><i>From: Pete Hayes [mailto:petehayes@cbba.com]</i></p> <p><i>Sent: Tuesday, February 02, 2016 1:04 PM</i></p>	

ED MEYER – E COUGAR MTN. PAA	
COMMENT	RESPONSES
<p>Ascension Properties Llc Cougar Summit Llc East Cougar Mountain Properties</p> <p>Ivan Miller, AICP Comprehensive Planning Manager Performance, Strategy and Budget Chinook Building 401 5th Ave Ste 810 Seattle, WA 98104</p> <p>Karen Wolf, AICP Senior Policy Analyst Performance, Strategy and Budget Chinook Building 401 5th Ave Ste 810 Seattle, WA 98104</p> <p>RE: East Cougar Mountain PAA Meeting</p> <p>Mr. Ivan Miller & Ms. Karen Wolf,</p> <p>I was in attendance at the meeting on January 27th at Issaquah City Hall representing Ascension Properties Llc, parcel No. 302406-9027 and Cougar Summit Llc, Parcel No. 302406-9028. The two parcels are located at approximately 18601 – 18899 SE 65th PL, Issaquah, WA. 98027. The parcels together are approximately 27.72 acres. The adjacent parcels occupied by single family residences average 1.78 acres with private water and on-site septic. Both parcels are currently within the Urban Growth Boundary and designated R-1 and within the Cougar Mountain Subarea Master Plan Development Area NC-P01. The current zoning designation of R-1 does not have a SO attachment to the current zoning designation suggesting no Overlay District is applied. In accordance with the old NC-P01 overlay the owners are allowed to apply for reclassification in the event the subject property is not within a master plan for village development. The classification described in NC-P01, effective August 18th, 1997 as amended by 14044 and Ordinance No. 15028 as of 10/11/2004 allows a reclassification zoning of</p> <p style="text-align: center;">1</p>	<p>Comments noted; see general response at <i>Lori Bennett</i> above.</p> <p>Note that these properties are not among those recommended for removal from the Urban Growth Area boundary.</p>

ED MEYER – E COUGAR MTN. PAA	
COMMENT	RESPONSES
<p>Ascension Properties Llc Cougar Summit Llc East Cougar Mountain Properties</p> <p>GR-2.5. Resolution No. 25789 amends GR 2.5 to UR or RA, allowing RA-2.5(only in designated urban areas and/or in areas not designated urban and in the rural forest focus area.) and RA-5.</p> <p>The proposed change from urban to rural would change R-1 to RA, no description was provided at the meeting as to if the subject property would be zoned RA-2.5 or RA-5. Under the RA – 2.5 designation full density would only be allowed in the event the property was located within a rural forest focus area and with a transfer of density credit pursuant to KCC chapter 21A.37.</p> <p>The subject property is contiguous on the south and west to the Cougar Mountain Wildland Regional Park which should have as much or more value than the areas currently designated rural forest focus area. Preliminary discussions with Bob Burns, Deputy Director Department of Natural Resources for King County that the subject parcels are available for purchase by King County to add to the Cougar Mountain Wildland Regional Park. The property would add significant value to the parkland. The properties owners remain open to work with King County on a portion of the property contiguous to the park.</p> <p>Under the current zoning and overlays the properties would be allowed to short plat the 19.99 acre parcel to four lots, but due to the urban designation not allowed to install private wells. The current zoning effectively prevented the property from being subdivided with private wells because of the urban designation and the fact that both Issaquah and Bellevue denied public water service unless the property was annexed. In the event the property zoning designation is changed to rural the property would then have the option to short plat with private wells serving the individual lots and no open space would be created. During the meeting at the City of Issaquah a water system manager expressed his concern that the area has been excluded from the Cascade Water Alliance service area. Many of the wells in the Cougar Mountain area and others that depend primarily on wells have been going dry with the extended hot weather in late summer and early fall. If King County can work with The Cascade Water Alliance to amend the service area and to work with the City of Bellevue to extend a water main, currently approximately 2,000 feet to the west of the area now on wells that would be a great help to ensure the water will not go dry and offer much greater safety in the event of a fire.</p> <p>The property is located on a private drive currently serving seven home-sites averaging 1.78 acres. An additional nine lots would maximize the rule provided for private drive allowable density. In the event the property is converted to a rural designation the owners request that 21A.06.196, Clustering would be allowed due to the proximity to the park. Under the RA-2.5 and in the event the property when clustered would create a natural open space for the preservation of critical areas, parks and permanent open space</p> <p style="text-align: center;">2</p>	

ED MEYER — E COUGAR MTN. PAA

COMMENT

Ascension Properties Llc
Cougar Summit Llc
East Cougar Mountain Properties

with no reserve for future development. If this language could be added to the RA-2.5 zoning designation it has the potential to greatly increase parkland at little to no cost to King County while preserving those

properties in accordance with 21A.06.196. In addition, the property owners have discussed that in the event this would be acceptable that they would consider deeding that open space portion to King County created by the added provision of 21A.06.196. Also considered by the owners would be to gift to King County any units (TDR's) allowable under the clustering provision over nine lots to be approved by short subdivision.

The property owners are open to discuss all options. The most important request is to be granted public water to provide a safer and more reliable water supply for the area.

Please feel free to contact me to discuss and keep me updated on the progress prior to presentation to King County Council.

Sincerely,

Ed Meyer
Manager



ADDRESS 812 102nd Ave NE
Bellevue WA 98004

PHONE 425-454-9923 x 102

Cc: Peter C Hayes Broker
Coldwell Banker Bain
150 Bellevue Way SE
Bellevue, WA. 98004
206-790-5263

RESPONSES

SHELLEY SAFRONEK — E COUGAR MTN. PAA	
COMMENT	RESPONSES
<p><i>From: Shelley Safronek [mailto:ssafronek@homefinance.com]</i> <i>Sent: Wednesday, February 03, 2016 6:22 PM</i></p> <p>I am a property owner of 4.49 Acres located at 180xx SE 60th Street, Issaquah WA. I purchased this property in March 2000 with the intention of subdividing my property in to 4 lots. I have spent a lot of money in engineering, wetlands studies, property taxes etc etc. since this time. The City of Issaquah originally issued us our water rights and then withdrew after we had already spent a lot of money on our project. We have had numerous issues with access, real estate recession etc that has caused us numerous delays.</p> <p>I am now working with my neighboring owners, Matthew Watson and Vadim Scherbenin with the hopes of finally getting this project to completion and would appreciate the opportunity to complete this project we began over 15 years ago. We are also working with the Parks Department in negotiating developing out "Peggy's Trail" which will connect the Lakemont/Montreau area to the Cougar Mountain Regional Park that runs through my property.</p> <p>I have provided a very short story version of what we've been through over the last 15 years and would be happy to provide all of the details for the purpose of this comment period if you direct me to the proper place. I would also like to add that I just received this post card notifying me of this meeting only two days prior to the meeting and unfortunately was out of town on business on January 27th so I could not attend.</p>	<p>Comments noted; see general response at <i>Lori Bennett</i> above.</p> <p>Without a complete address, King County cannot determine whether you property is among those recommended for removal from the Urban Growth Area boundary. Please see the Area Zoning Study for additional detail on the recommendation.</p>

V. COMMUNITY MEETING NOTES

Meeting 1: Vashon-Maury Island

November 9, 2015 – There was approximately ten attendees.

Comments on Comp Plan Public-Review Draft:

- I'm glad to see the 49 Vashon policies from the 2000 Comp Plan are retained in this draft. Please keep those policies and observe them.
- Please hold an additional Vashon meeting during review period, after sufficient time for us to review the Draft.
- Vashon provides R&R for mainland urban residents. But the island is gentrifying and long-time residents can no longer afford to live here. We'd like to stay, not be priced out.
- King County Parks division does not support Vashon Parks District strongly enough.
- Clarify scope-of-work language regarding Vashon Town zoning study.

Referrals to other King County agencies:

- Question about boundary of Vashon Sewer District service area – has it changed or has policy about service changed? Referred to Steve Hirschey, Department of Natural Resources and Parks.

Questions during discussion:

- How do ESJ issues show up on Vashon and in the Draft? How about affordable housing?
- Explain mining sites.
- Question about Vashon Town Plan. How much of it was implemented?
- Explain Vashon Town zoning study.
- Explain a past "buildout" population estimate for the island.
- Question about an alternative housing plan. How will the Executive's announced emergency-housing declaration affect permitting?
- Explain Plan adoption process and opportunities for further citizen input.
- How does current CSA work relate to former community council?
- What does Draft contain about water resources, specifically in the WRIA that includes Vashon?

Meeting 2: Four Creeks – Maple Valley

November 17, 2015 – There were approximately fifteen attendees.

Questions and comments on process and content of Public Review draft:

- Questions and comments on process and content of Public Review draft:
- Will the Demonstration Project provision for mining sites, as it pertains to Reserve Silica, be eliminated? Support for eliminating this provision.
- Will King County change the code so that urban-serving facilities, pertaining specifically to stormwater facilities, be required to locate within the UGA? Answer: The County is considering this change.
- Strong support for including the broader community in the subarea planning process related to the Cedar Hills/Maple Valley Area Zoning Study. Concerns and confusion regarding the subarea planning program terminology and request to simplify.
- Strong opposition to any allowing Transferable Development Right receiving sites in the Rural Area. This applies to the Transferable Development Right concurrency provision and the RA-2.5 provision.
- Support for amendments that make the document more readable. Some members expressed their appreciation for the proposed amendments related to climate change, stormwater and landslide mapping and notification.
- Concern for continued use of Transferable Development Right s in urban unincorporated areas, specifically in the East Renton Potential Annexation Area. Cities receive amenity funding but unincorporated urban areas do not; this is not fair.
- Extended discussion about the beaver removal policy with most comments in support of the policy.
- For some of the urban area residents in attendance, they expressed concerns that there are not bold changes related to annexation; how can the County help these residents who are stuck in area that doesn't get services and don't want to annex.
- Comments from a property owner that is the subject of the North Bend UGA Area Zoning Study regarding why the property can't be added to the UGA and annexed to North Bend. The property owner is opposed to the recommendation in the Public Review Draft to deny the request for redesignation to urban absent the use of the Four to One Program. At the same time, some other attendees expressed concerns regarding expansions of the urban growth area and the effect that would have on rural lands. Meeting 3: West Hill – Skyway – North Highline – Urban Annexation Areas

Meeting 3: West Hill / North Highline/ Urban Annexation Areas

November 19, 2015 – There were approximately thirty-five attendees

Questions and comments on process and content of Public Review draft:

- Does this Plan reflect controversies in the Maple Valley/Black Diamond area?
- Has the community been notified about Seattle-King County negotiations regarding possible White center annexation to Seattle?
- When will zoning changes stemming from this Plan update be considered? In particular, commercial and mixed-use changes. We need economic development.
- How do we ensure that Plan policies get implemented?
- Comment: Avoid designation of high-density residential without commercial to support it.
-

Annexation issue:

- Does King County want us [Skyway] to annex to Seattle?
- How can we develop an annexation plan?
- Comment: Piecemeal annexation [especially commercial] by Renton has harmed this community.
- Comment: Consider an alternative model besides annexation: shared services between city and county.
- The legislature approved a bill allowing a separate vote on utility district annexation.
- Annexation process is confusing and unsettling. There is a lot of uncertainty here.
- Will our taxes go up with annexation?
- With annexation, we would lose our fire district and water/sewer district.

Housing/economic development issues:

- Explain TDR.
- Explain how the Plan can have health policies but no proposed zoning changes [?].
- How should we invest in public transportation to mitigate traffic congestion?
- Comment: Skyway residents are housing-burdened and underemployed. [We need econ dev]
- How much of low-income housing need will be met in Skyway/West Hill?
- What does the Plan do to address low-income residents and housing need?

- How will low-income housing development be coordinated with services?
- Does the Plan consider concentrated poverty in North Highline and need for increasing economic/business diversity?

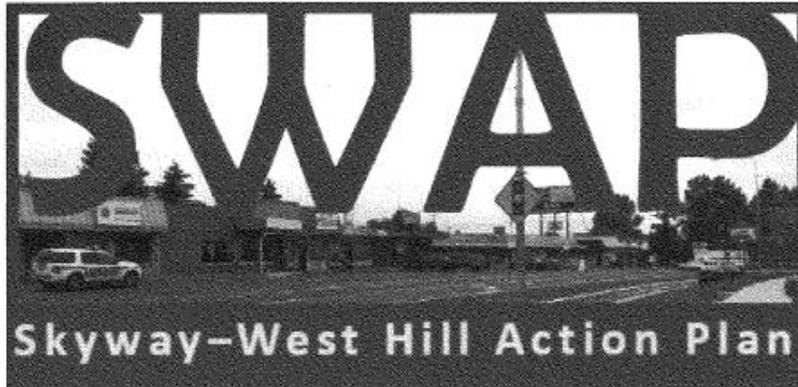
Skyway/West hill Action Plan (SWAP):

- SWAP included recommendations for commercial and mixed-use zoning.
- [Something about 3,000 – 5,000 square foot lots.]
- “We’re paying higher tax rates per \$1,000 AV than Bellevue” [yes, that’s true]
- SWAP included relationship between healthy housing, local farms & schools.
- Comment: Promoting farms on unused school lands would facilitate healthy food for kids.
- Comment on school lunches and free/reduced price breakfasts for kids.
- SWAP stakeholders at the meeting said “Thank you” to County for the SWAP.
- Comment: Request that proposed zoning changes in SWAP be coordinated with KCCP-16.
- Comment: Comp Plan must explicitly allow zoning [changes] authorized by the SWAP.

Marijuana issue:

- What factors are informing King County policy on marijuana?
- Most or all of pot retail outlets in all unincorporated KC are in Skyway/N. Highline
- County’s marijuana policy is a lost opportunity to identify health impacts [?]
- Kids at school aren’t prepared to learn [because of drug availability]
- Marijuana smoke pervades schools and neighborhood. Law enforcement concern.
- Pot shop opened next to a bus stop.
- SWAP has a section on mental health services and substance abuse.
- SWAP recommends working closely with Valley Medical and other health providers.
- The impact of many pot shops in Skyway has not been tested. Investors have chosen to locate here; let’s pause until we determine impact of so many shops.
- We need help from County to avoid being overserved. Call for moratorium.
- This community wants variety of businesses, restaurants, community center – not more pot shops.
- What are the rules governing retail shop locations?
- Tax revenue from marijuana should return to the places with concentration of shops.

HANDOUTS RELATED TO MEETING: SUPPORTING ADOPTION OF SWAP



November 19, 2015

Dear King County Executive and Councilmembers,

Thank you for partnering with the community to update our subarea plan for the unincorporated urban growth area Skyway-West Hill. This grassroots community planning effort has resulted in an action plan that we can all strive to implement. We enthusiastically submit the following Skyway-West Hill Action Plan (SWAP) support letters from community partners and stakeholders.

- ❖ City of Renton, Mayor's Office
- ❖ City of Renton, City Council
- ❖ West Hill Business Association
- ❖ Renton Area Youth and Family Services
- ❖ Urban Family
- ❖ King County Fire District 20
- ❖ Skyway Water and Sewer District
- ❖ Seattle King County NAACP

Thank you,

SWAP Steering Committee and Skyway Solutions

Quinn Fricke *Wesley Clark* *Kandyn Johnson*
Peter Johnson *John*
Michael *Jon A. Clark*
Michelle *John*
Douglas Russell *SPB*
Janet Burwell *SPB*

HANDOUTS RELATED TO MEETING: SUPPORTING ADOPTION OF SWAP

Denis Law
Mayor



October 13, 2015

Michael Majeed, Executive Director
Skyway Solutions
P.O. Box 78580
Seattle, WA 98178

Dear Michael:

The City of Renton fully supports Skyway Solutions' goal to employ its partnership strategy and to launch its early implementation efforts.

Many of the West Hill/Skyway neighborhood residents identify with the City of Renton, perhaps because they shop in our city and play in our parks or because the Renton School District encompasses the area. I personally experienced the central location, rich diversity, spectacular views and community pride when I lived in the neighborhood many years ago. More recently, city staff and I worked with county, state and federal offices to identify funding opportunities and obtain financial support as the Renton City Council moved forward to put an annexation vote on the ballot in February 2012. Even though the vote did not pass for annexation into the City of Renton, we remain supportive of the area and the desire to create a safe and vibrant community.

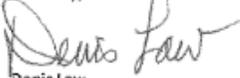
The initiatives that Skyway Solutions wants to pursue and implement will:

- Promote jail diversion and post-release linkages for incarcerated individuals who need mental health and/or substance abuse treatment, supportive housing and employment services (King County Criminal Justice Initiative).
- Create a full-service neighborhood school that becomes a hub of the community where public and private partner agencies come together with the school, providing integrated services that meet the full range of socio-emotional, health and learning needs of the residents (Skyway West Hill Neighborhood School Initiative).
- Revitalize Skyway Park by increasing lighting, access and usability; building youth sports facilities and attracting programming; creating and improving play zones; and building an urban farm within Skyway Park to increase access to healthy food, provide job training opportunities and a learning environment for youth (Skyway Park Improvements).

When I lived on West Hill, we had two supermarkets, a hardware store, a Hallmark store and many nice restaurants and other small businesses to serve the local residents. Crime was not a big issue and the community felt safe. I feel the leadership of Skyway Solutions, with its staff and dedicated volunteers, has developed a plan that values youth and families, addresses public safety, and provides the opportunity to improve the quality of life and future for many people.

The City of Renton looks forward to partnering with you on this important venture.

Sincerely,



Denis Law
Mayor

cc: Renton City Council

15-099

Renton City Hall • 1055 South Grady Way • Renton, Washington 98057 • rentonwa.gov

HANDOUTS RELATED TO MEETING: SUPPORTING ADOPTION OF SWAP

Denis Law
Mayor



October 16, 2015

Michael Majeed, Executive Director
Skyway Solutions
P.O. Box 78580
Seattle, WA 98178

Dear Michael;

I am in full support of the Skyway Solution goal of employing partnership strategy and early implementation efforts. Efforts to create a safe and vibrant community such as:

- King County Criminal Justice Initiative – Promoting jail diversion for mental health needs
- Skyway West Hill Neighborhood School Initiative – Creating a neighborhood full-service school that meets a full range of socio-emotional, health and educational needs
- Skyway Park Improvements – Increased lighting, access and usability to attract, create and improve play

My colleagues and I do understand that, even though the vote to annex to Renton did not pass, many of the West Hill/Skyway residents to identify with the City of Renton. These residents shop, play and work in our city.

I am especially supportive of these initiatives given the particular equity challenges that face South King County, especially among vulnerable populations, our youth and people of color.

We look forward to an on-going and productive partnership with the leadership of Skyway Solutions and its dedicated staff and volunteers.

Sincerely,

A handwritten signature in black ink, appearing to be "Ed Prince", written over a horizontal line.

Ed Prince
Council President
Renton City Council

HANDOUTS RELATED TO MEETING: SUPPORTING ADOPTION OF SWAP



West Hill Business Association

P.O. Box 78460 Seattle, WA 98178 • www.westhillbusiness.com • (206) 772-9291

Andra Kranzler, Community Economic Development Manager
Skyway Solutions
PO Box 785809
Seattle, WA 98178

October 27, 2015

Dear Andra,

The WHBA supports the SWAP! We are committed to helping local business and help grow Skyway so residents are connected to the commercial district.

WHBA members have been briefed on the Skyway West Hill Action Plan on a monthly basis. The priorities identified in the SWAP reflect the goals of the Association. We are eager to grow our membership to attract local home base businesses that will cater to the retail, health and professional service needs of the West Hill community. We are vested in creating a shop local campaign that will create space for local entrepreneurs to thrive. This includes supporting the community's priority to create a pedestrian friendly environment in the Skyway Business District and do a facelift of unattractive old and plain building facades and develop the empty spaces between commercial buildings into usable space such as mini public plazas or green spaces.

Sincerely yours,

A handwritten signature in black ink that reads "Tess Hayden".

Tess Hayden
President, West Hill Business Association

HANDOUTS RELATED TO MEETING: SUPPORTING ADOPTION OF SWAP

Executive Dow Constantine
King County Executive
King County Chinook Bldg.
401 5th Ave, Suite 800
Seattle, WA 98104

October 29, 2015

Re: Comments on the Proposed Skyway- West Hill Action Plan

Dear Executive Constantine:

I am writing to express the support of my organization, Renton Area Youth and Family Services (RAYS) for the Skyway – West Hill Action Plan. This support is based upon direct knowledge of the plan and the broad range of action steps put forth to address significant community issues. As an organization, we have participated in the development of the plan, and as a human service provider on the West Hill, we can clearly support the work going forward in the implementation and will do so.

As a result of the 1994 Community Plan, RAYS opened its Family Center in the Skyway Neighborhood with the support of King County, the Renton School District, and a variety of community groups. We are well integrated in the community and intend to work closely with other groups to implement the plan primarily in the areas of health care and behavioral health service access, gang intervention, and a variety of prevention activities with children, youth, and families. The plan represents both the challenges as well as well thought out opportunities and strategies to address those challenges as a community. We are already on that path.

I urge the King County Government to adopt the plan and to add support for it's implementation over the next several years. Thank you.

Sincerely,

Richard Brooks
Executive Director

Cc: King County Councilmember Larry Gossett,
Andra Kranzler, Esq., Skyway Solutions

HANDOUTS RELATED TO MEETING: SUPPORTING ADOPTION OF SWAP



November 9, 2015

Dear Distinguished Members of the King County Executive Council,

It is our pleasure to write a letter of support for the Skyway West Hill Action Plan (SWAP) being submitted by Skyway Solutions to revitalize the Skyway West Hill community. Urban Family is one of the leading youth-serving organizations in this community and our mission is to engage marginalized urban youth in positive activities that empower them to be their best. Our youth contributed to the creation and collection of over 280 surveys completed by youth and their families to support projects that impact the future of youth in this community. The results of these surveys reaffirm the need for youth voice in this process and prioritize the projects they want to see happen for their community.

Skyway Solutions and Urban Family have successfully collaborated on several projects including organizing a youth-centered community Open House that brought in over 100 residents to support Thriving Educated Youth as part of this plan. Your approval of the SWAP will send a clear message to the youth in our community that their voice matters and when you get involved, change can truly happen. Thank you.

Blessings,

Annie L. Patu

Annie L. Patu, Executive Director
(206) 257-2215 ext. 105

"If you want to go fast, go alone. If you want to go far, go together"

*c/o Creston Point Apts. Main Office
13445 MLK Jr. Way S
Seattle, WA 98178
www.urbanfam.org*

HANDOUTS RELATED TO MEETING: SUPPORTING ADOPTION OF SWAP



12424 76th Ave S
Seattle, WA 98178
Phone: 206-772-1430 Fax: 206-772-6095
Fire Chief Joseph Clow

November 9, 2015

The Office of the King County Executive
Executive Dow Constantine
401 5th Avenue Suite 800
Seattle, WA 98104

Subject: The Skyway - West Hill Action Plan

Dear Executive Constantine,

The members of the Board of Fire Commissioners of King County Fire District 20 (KCFD 20/Skyway Fire) have been approached by the Skyway Solutions Community Group to review and endorse the Skyway – West Hill Action Plan (SWAP) developed by their group prior to adoption of the SWAP within the King County Comprehensive Plan.

The KCFD 20 Board offers our endorsement of the SWAP within the scope of services provided to the Skyway – West Hill Community for the provision of Fire, Emergency Medical and Community Public Safety Education services.

Further, this board recognizes our responsibilities and duties for the implementation of those parts of the SWAP that the fire department has direct responsibility over as a service provider and those areas where we can partner with other community agencies and groups in extending services to our citizens.

Thank you for your consideration in this matter.

Respectfully,

By:   
Jeff D. Doppmann Eugene V. Lux Terry W. Miller
Chairman of the Board Fire Commissioner Fire Commissioner

For: King County Fire District 20

Board of Fire Commissioners: Jeff Doppmann (Chair), Gene Lux and Terry Miller

HANDOUTS RELATED TO MEETING: SUPPORTING ADOPTION OF SWAP

6723 S 124th St
Seattle, WA 98178



(206) 772-7343
Fax: (206) 772-5860

November 10, 2015

Skyway Solutions
Attention: Michael Majeed, Executive Director
PO Box 78580
Seattle, WA 98178

RE: **Skyway-West Hill Action Plan**

Dear Mr. Majeed,

Skyway Water and Sewer District (District) is a publicly owned water and sewer district authorized under the Revised Code of Washington Title 57 Water-Sewer Districts. The District's mission is to provide its customers with quality water and sewer service and fiscally and environmentally sound management of their publicly owned water and sewer system and resources.

Over the past year, the District has supported development of the Skyway West Hill Action Plan (SWAP) in the following ways:

- Commissioner Jon Ault has been a member of the SWAP steering committee and has participated in the monthly steering committee meetings;
- General Manager Cynthia Lamothe participated in SWAP technical advisory group meetings; and
- The District has provided community meeting space for Skyway Solutions to host monthly SWAP steering committee meetings.

Skyway Solutions staff gave several presentations to the Board of Commissioners regarding the SWAP planning efforts and collected feedback. The District will support the goals for growth that have been identified in the SWAP in its role as the provider of water and sewer services in the Skyway-West Hill area.

Sincerely,

A handwritten signature in black ink that reads "Jon Ault". The signature is written in a cursive style.

Jon Ault
President and Commissioner
Skyway Water and Sewer District

Cc: King County Executive Dow Constantine
King County Councilmember Larry Gossett

HANDOUTS RELATED TO MEETING: SUPPORTING ADOPTION OF SWAP



Seattle King County NAACP

715 23rd Avenue, Seattle WA 98144
Phone: (206) 324-6600 | Fax: (206) 324-1422 | www.seattlekingcountynaacp.org

November 17, 2015

RE: SKYWAY SOLUTIONS - SKYWAY WEST HILL ACTION PLAN - EARLY IMPLEMENTATION STRATEGIES

To: King County Council
AND To: King County Executive Office

I write in support of Skyway West Hill Action Plan and Skyway Solutions partnership strategy.

Skyway Solutions has been developing a comprehensive approach proactively seeking advice from residents, faith groups, business owners and community organizations from a wide cross-section of the community to complete a Skyway West Hill Action Plan.

This plan will help mobilize resources to improve access to healthy affordable foods, create jobs and increase local investment in Skyway West Hill and other related economic activity. This community is an unincorporated area, recognized food desert, with significant health care challenges with no community center and health care clinic.

Skyway West Hill is a majority minority community facing economic and housing challenges that create significant barriers for the vulnerable populations and youth.

Investment it needs to support the urban environment of nearly 15,000 residents majority vulnerable populations such as elderly, youth, people of color and low income.

Skyway has been home to many African Americans displaced from the Central District Seattle. The Skyway West Hill Action Plan is a tool to braid resources for the community.

We fully support, Skyway Solutions goal to employ its partnership strategy and to launch its early implementation efforts.

These efforts are:

- a. King County Criminal Justice Initiative – an Initiative to promote jail diversion and post-release linkages for incarcerated individuals who need mental health and/or substance abuse treatment, supportive housing and employment services. Assign an additional KCSO Deputy focused solely in Skyway West Hill for prevention methods and supporting alternative community policing models.
- b. Skyway West Hill Neighborhood School Initiative – A coordinated approach to create a Neighborhood School, A full-service school that becomes a hub of the community where an array of public and private partner agencies come together with the school to provide a comprehensive set of integrated services to meet the full range of socio-emotional, health and learning needs of the Skyway West Hill residents.
- c. Skyway Park Improvements – an initiative to increase lighting, access and usability; build youth sports facilities and attract programming; create and improve play zones; and build an urban farm on

HANDOUTS RELATED TO MEETING: SUPPORTING ADOPTION OF SWAP

within Skyway Park to increase access to healthy food, provide job training opportunities and a learning environment for youth.

Skyway Solutions has engaged and employed residents as leaders in every part of this process.

To improve economic and physical health conditions of the residents in Skyway West Hill, it will need significant investment and a coordinated strategy which Skyway Solutions has presented.

Sincerely,



Dr. Sheley Secrest,
Economic Development Chair
Seattle-King County NAACP

Meeting 4: Snoqualmie Valley – Bear Creek – Sammamish Area

December 2, 2015 – There were approximately one-hundred and ten attendees.

Comments on Comp Plan Public-Review Draft:

- General: Reference to micro housing, cottage housing, inconsistencies between zoning and public health.
- General: There's a theme of collaboration but the City of Snoqualmie feels that the county did not collaborate with Snoqualmie regarding proposal.
- Fall City: If adding sewers in Fall City, need to also consider adding parking, raising height restrictions; in other words, doing a real plan on how to mitigate and address the impacts of development.
- General: The County's 500 foot radius for notification of land use issues does not work. It should be increased to 1500' or 200 people. DPER noted that the notification is actually 500 feet or a minimum of 20 property owners.
- General: Wondering what is the overall objective of all of these area zoning studies and individual actions by the County – what's the plan?
- Fall City: the County purchased the land, but then did not have a plan.
- Tall Chief: the Request for Proposals process was flawed because it did not include input from the local community.
- Carnation: 4:1 – if UGA means something consider more carefully 80 dwelling units right up against UGA – too much. Run off.
- Duthie Hill: The Notch has important sensitive wetlands and is the headwaters of a stream. Development will harm these features.
- General: The 4:1 program results in isolated pieces; what is accomplished through this approach? How are they managed?
- Duthie Hill: This proposal was denied in 2008 and 2012. Why is it back; what has changed in the City of Sammamish that its being considered now?
- Duthie Hill: Do not need to annex to fix the road. Look at North Bend – they have interlocals to address these issues. There's more than just the road to consider, and more pathways than expanding the urban growth area.
- Duthie Hill: The issue not about road; there is a conflict of interest within the City of Sammamish. Staff in the City have ownership in the Notch and will make a profit if this passes.
- Duthie Hill: Concern about using the Growth Management Planning Council to make this decision. The public doesn't know about this group. Also, the County and City are working together; when will they talk with the community?

- Duthie Hill: The history goes all the way back to 1894 – this was already a community. When the Trossach's development went in, the community objected to this development and they were "written out" of the urban growth areas. The community didn't want 7,500 ft. lots, and this had nothing to do with city. The community fought it then but some opinions have changed now. And, the issues are complex; it's not just residents – there is a 1.5 acre lot owned by LLC. Development in the Notch will pollute the pond and destroy the neighborhood. Some don't the Notch to become another Trossachs with R-4 densities.
- Snoqualmie: There has not been enough communication with city. When will the collaboration start happening?
- Snoqualmie: What is the City of Snoqualmie's plan for the Interchange. The City's Planning Director said the plan is to annex for institutional and commercial development.
- Snoqualmie: The County needs to uphold its commitment to not develop between the Ridge and the I-90 interchange. There's so much to lose up here – trails with horse access, forests that will be clear cut, sensitive areas. The UGA doesn't need to be a straight line. Also, there is not enough school capacity. Keep this a beautiful place to live.
- Duthie Hill: County & GMPC looking at amendments; what is the timeline. The timeline is summer to fall review and comment by the GMPC if there are proposed UGA amendments.
- Tall Chief: The Request for Proposals was supposed to be about public benefits. Now it's about selling the land at the highest price.
- Tall Chief: Public process – being told executive was satisfied all 3 proposers. But, the County hasn't made the decision in public manner. They promised local people would be on selection committee but they were not included. Where is public benefit? We are getting three building sites on three parcels on 191 acres.
- Carnation: This will be a community asset where more people can experience living near/on a farm. Residential and agriculture can coexist – the project would be about 5 acres with about 19 homes. The adjoining project would provide access to the development. The project would leave the farm ground farmable. The project would give an opportunity for other people to experience area.
- Carnation: We moved out to valley to see farmland and open skies. Not homes.
- Carnation: The homes have driven the livestock away. Farm smells travel and get into homes; then people complain about farms. The City needs businesses not one time revenues from construction.
- Carnation: Snoqualmie Valley Preservation Alliance is a 501 c 3.
- Carnation: The Remlingers produce livestock and revenues through entrance fees. This development is bad for farmers and bad for the future unsuspecting home owners.
- Carnation: I don't think this land was in the City in 1994 and don't think it's eligible for development. The project will create a problem with runoff.
- Carnation: Why do we need more houses in carnation? What we need is something for kids to do.

- Carnation: By building more homes, there is more revenue to pay for the "something for kids to do." The City needs to grow residential. This will allow community development. It's a great community where people like live; other people want to live here too. We also want a bank, police office, etc. We can preserve a massive amount of the land with just 19 homes.
- Carnation: Moved here in 1974. Own a 40 acre farm with turkey & grass-fed beef. We want to keep the land in farmland, and to do that we need a tax base in Carnation. We support the Remlinger proposal.
- General: Council District has over 1,007 square miles – a huge area. The issues on the table are simply those very few 264 acres that are under consideration. That is the larger context for economic development in the rural area that is driving these proposals.

HANDOUTS RELATED TO MEETING: CARNATION PETITION OPPOSING URBAN GROWTH AREA EXPANSION

dedwardjones@hotmail.com

PROTECT CARNATION !

Whereas, The Metropolitan King County Council adopted Motion # 14351 on May 2, 2015 which establishes the Scope of Work for the Executive in preparation of the proposed 2016 Comprehensive Plan update, and

Whereas, Motion 14351 includes a Carnation Sub Area Study (#14) which will evaluate conversion of rural land to urban densities, and

The rural lands proposed for conversion has been in farming for nearly 100 years, and

Whereas, the City of Carnation and its urban growth area includes sufficient land to accommodate 100% of its population and employment targets; and

Whereas, King County established it's Agricultural Production District's in 1994 to permanently protect it's rare and productive soils; and

Whereas, King County established it's Rural Area in 1994 to permanently protect its low density, rural character dominated by small farms and forests; and

Whereas, the proposed conversion of Carnation rural lands in a sub-area study was not presented to the City of Carnation, neighbors, nor was it any part of the public process leading to the King County Executives Recommended Scope of Work motion which was submitted to the Metropolitan King County Council on March 2, 2015; and

Whereas, the proposed conversion of Carnation rural lands in a sub-area study was not recommended by the County Executive

Whereas, on May 11, 2015 the Metropolitan King County Council in Motion #14351, added a new sub area study to evaluate conversion of rural Carnation lands to urban densities; and

Whereas, the proposed conversion of rural lands at Carnation are a textbook example of urban sprawl that violates adopted policies in the State Growth Management Act, the King County Countywide Planning Policies and King County agricultural and rural land Comprehensive Plan policies.

PROTECT CARNATION !

1

HANDOUTS RELATED TO MEETING: CARNATION PETITION OPPOSING URBAN GROWTH AREA EXPANSION

Now Therefore, We The undersigned strongly OPPOSE Any Change In The Existing Rural Zoning On Carnation Parcels # 1525079049, 1525079010, 1525079005 and any surrounding areas including any proposed four to one as identified in Metropolitan King County Council Motion #14351. Please add us as parties of record to this action.

NAME	STREET ADDRESS	DATE
Diane J Magnach	PO Box 519/30420 NE 35th	
Lina J Magnach	Carnation, WA 98014	7-20-15
George E Magnach	PO Box 519/30420 NE 35th	
George E Magnach	Carnation WA 98014	7-20-15
Lena Magnach	P.O. Box 519	
Bera Magnach	Carnation WA 98014	7-20-15
Dusty Rose	37419 NE 60TH STREET Carnation WA 98014	7-20-15
SHAWN ROBINSON	6024 329th AVE NE CARNATION WA 98014	7-20-15 503-0541
Najal Khe	6024 329th Avenue Carnation WA	7/20/15
[Signature]	10520 310th Ave NE Carnation, WA 98014	7/20/15
Louise Jones	5700 328 AVE NE Carnation WA 98014	7-20-15
Laban Silk	5700 328 AVE NE Carnation WA 98014	7-20-15
Tully Ely	4729 327 th AVENUE Carnation	7-21-15
Anne Orsland	PO. Box 6016	
Amel Dabul	4333 70th Carnation, WA	7-21-15
Dina Aronica	359 325 90 NE 50	
PHIL HAMMOND	6813 329th AV NE	7/22/15

PROTECT CARNATION !

HANDOUTS RELATED TO MEETING: CARNATION PETITION OPPOSING URBAN GROWTH AREA EXPANSION

3

Name	Street Address	Date
Dick Jones	5700 328 th NE P.O. Box 244, Carnation, WA 98014	7-22-15
Brandon Cousens	4003 Tolt Ave 98014 P.O. Box 924 Carnation WA	7-22-2015
Debra Amzman	P.O. Box 391 Carn. Wa	7-22-15
Thomas E. Lutz	P.O. BOX 1062 CARNATION WA. 98014	7-22-15
Robert Amzman	PO BOX 391 WA 98014 CARNATION WA	7-22-15
Carl E. Voshell	4775 Tolt Ave PO Box 393 Carnation WA	7-22-15
Tyler C. Pearty	4506 260 th AVENUE RENMOND 98053	7-21-15
John Marie Baron Martin	33112 NE 70 th St. Carnation, WA. 98014	7-22-15
Lori Aurora	32550 NE 50 th St Carnation WA. 98014	7-22-15
Anne Richter	4932 328 th Avenue Carnation WA 98014	7-21-15
Ben Richter	4932 328 th Avenue NE Carnation WA 98014	7-21-15
Michaela Richter	4932 328 th Avenue Carnation WA 98014	7-21-15
Ted Orwiler	4901 328 th AVENUE Carnation WA 98014	7-21-15
Allen Arbogast	5915 32nd Ave NE Carnation WA	7-21-15
Cristina Cortez	4846 328 th Ave NE Carnation WA 98014	7/21/15

HANDOUTS RELATED TO MEETING: CARNATION PETITION OPPOSING URBAN GROWTH AREA EXPANSION

4

Name	Street Address	Date
Wes Gottfried	4886 328th Ave	
Wes Gottfried	NE Carnation, WA 98014	7/21/15
Liisa Seltz	4003 Tolt Ave # C Carnation WA 98014	7/22/15
Nick Selvino	7330 Tolt River Rd Carnation WA	7-22-15
Dan Peters	33511 NE 66th St Carnation, WA 98014	7/22/15
Aminda Pfeiffer	31439 W. Commercial Carnation	7/25/15
Sandra Skampe	31439 W. Commercial Carnation	7/25/2015
DeDe Norris	19006 312th Ave NE Duvall WA	7/25/15
Richard Patterson	19006 312th Ave NE Duvall WA	7/25/2015
Tony Payne	32503-NE 202nd P Duvall WA 98019	7-25-15
Brian Leonardson	4200 270th Ave NE Redmond WA 98053	7-25-15
Erika Nykreim	6410 Carnation Duvall Rd NE Carnation	7-25-15
David & Carol	32308 NE 95th St Carnation WA 98014	9/26/15
Rich Johnson	31639 W. Commercial Apt B Carnation WA 98014	7/24/15
Angela Willett	33101 N.E. 70th St CARNATION WA 98014	7/2/15
Joseph Willett	33101 N.E. 70th St Carnation WA 98014	7/2/15

HANDOUTS RELATED TO MEETING: CARNATION PETITION OPPOSING URBAN GROWTH AREA EXPANSION

5

Name	Street Address	Date
Eric Martin	33112 NE 70th ST. CARNATION WA 98014	7-26-15
Diane Pagel	7005 328th Ave NE Carnation WA 98014	7/26/15
Roberta Hart	10421 316th Ave NE CARNATION WA	7/26/15
Gingony May	15848 206th Ave SE Issaquah WA 98027	07/24/15
Patricia M. Underhill	32501 NE 50th #4 Carnation WA. 98014	7/26/15
Paul Umbrell	32501 NE 50th #4 Carnation, WA. 98014	7/26/15
Famela Jeffrey	4468 70th Ave P.O. Box 310 Carnation, WA 98014	7/26/15
Robert Sherman	32501 NE 50th ST #14 CARNATION, WA	7/26/15
Myra Schuyler	32501 NE 50th ST CARNATION WA 98014 #39	7/26/15
Carla Anonice	3230 NE 47th St. Carn. WA 98014	7/26/15
Joseph G. Abair	32610 NE 47 ST Carnation WA 98014	7/27/15
MARGARET HINDLE	32109 RETIRE ST. CARNATION WA 98014	7/27/15
Gregory Dunham	7315 328th Ave NE CARNATION, WA 98014	7/27/15
Tom L. Henhouse	7530 70th RIVER RD. CARNATION, WA, 98014	7-28-15
Presley	4506 260th Ave NE Redmond WA 98053	7-28-15

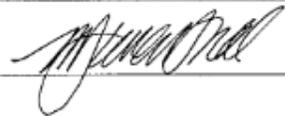
HANDOUTS RELATED TO MEETING: CARNATION PETITION OPPOSING URBAN GROWTH AREA EXPANSION

6

Name	Street Address	Date
0 Gerald Schall	CARNATION 2110-310 th AVE NE	7/29/2015
Susan Schmall	//	//
Maggie Long	1711 Duwall Mon Rd NE Duwall, WASH 98019	7-29-15
Mick	27800 NE 100TH ST CARNATION WA 98014	7-29-15
Lynette Suman	32501 NE 50th St #14 Carnation, Wa 98014	7-29-2015
Mike Long	1711 Duwall Monroe Rd NE Duwall, WASH 98019	7-29-15
Fawn McCreary	6410 Carnation Duwall Rd NE Carnation Wa. 98014	7-29-15
de Long		

HANDOUTS RELATED TO MEETING: CARNATION PETITION OPPOSING URBAN GROWTH AREA EXPANSION

Now Therefore, We The undersigned strongly OPPOSE Any Change In The Existing Rural Zoning On Carnation Parcels # 1525079049, 1525079010, 1525079005 and any surrounding areas including any proposed four to one as identified in Metropolitan King County Council Motion #14351. Please add us as parties of record to this action.

NAME	STREET ADDRESS	DATE
Alexandra Holien	1817 50th Ave S Seattle, WA 98144	7.22.15
Monica Callaghan	2207 E Republican St. Seattle, WA 98112	7/22/2015
Mary Levine	55 E Roanoke Seattle WA 98102	7/22/15
ANNE MORELLO to	116 Fairview Ave N Seattle WA 98109	7/22/15
Sara Dickerman	917 22nd Ave. E. Seattle WA 98112	7/22/15
Bonnie Morrison	32923 NE 60th St Carnation, WA 98014	7/23/15
Susan Fondren	1107 Grand Ave Seattle WA 98122	7/23/15
Ryan Casaday	3249 39th Ave SW Seattle, WA 98116	7/23/15
Jennifer Belle	6673B NE Windermere Rd Seattle, WA 98115	7/23/15
Laurel Fishman	321 36TH AVE E Seattle, WA 98112	7/23/2015
James Theofuly	737 31st Ave E Seattle, WA 98112	7/24/2015
Laura Kerr	520 Stadium Place #46 Seattle, WA 98104	7/24/2015
	1244 Parkside Sea 98112	7/28/2015

HANDOUTS RELATED TO MEETING: CARNATION PETITION OPPOSING URBAN GROWTH AREA EXPANSION

Now Therefore, We The undersigned strongly OPPOSE Any Change In The Existing Rural Zoning On Carnation Parcels # 1525079049, 1525079010, 1525079005 and any surrounding areas including any proposed four to one as identified in Metropolitan King County Council Motion #14351. Please add us as parties of record to this action.

NAME	STREET ADDRESS	DATE
Spreight Jankin	903 Harvard Ave Seattle, WA 98102	7/28/15
M. U. [Signature]	4666 25th Avenue #277 Seattle, WA 98105	7/28/15
Muel [Signature]	1630 38th Ave. Seattle, WA 98122	7/28/15
Eden Stoner	2550 Roosevelt Way NE Seattle WA 98115	7/29/15
Carol Troup	1908 22 Ave E Seattle WA 98112	7/29/15
Justin [Signature]	706 36th Ave Seattle, WA 98112	7/29/15
Luigi [Signature]	3805 E Madison St Seattle WA	7/29/15
[Signature]	408 W Cornstock Seattle WA 98114	7/29/15
William J. Hansen	2320 - 43rd Ave E #201A Seattle 98112	7/29/15
CHAUNCEY ZNAKE	2201 E. REPUBLICAN SR., WA 98112	7/29/15
David Zarate	22422 87th Ave W Edmonds WA 98026	7/29/15

HANDOUTS RELATED TO MEETING: CARNATION FIELDS FACT SHEET, SUPPORTING EXPANSION

CARNATION FIELDS FACT SHEET

Carnation Fields Project

A Report to Our Neighbors from Gary and David Remlinger, David Hopkins and Vern Tillman

Our goal is to support the long-term economic viability and sustainability of Carnation, while continuing to honor the area's agricultural roots. Our vision for Carnation Fields incorporates new homes and designates space for active farming, putting all the land to its best use.

Basic Information

- Carnation Fields owns 25 acres of land on the north end of Carnation.
 - All utilities (sewer, water, power) are already on the property, and there are access roads to the property.
- Our vision is to cluster approximately 19 homes on the sloped hillside on the east portion of the property, while maintaining the lower land as productive farmland.
- The Remlingers will actively farm this land; Carnation Fields' four partners are committed to keeping it in active farmland.
- Carnation Fields intends to use the Four to One Program allowed under existing County Code; the cluster of approximately 19 homes will be limited to five acres, with the remaining 20 acres being dedicated for King County farmlands.

About Carnation Fields' Partners

Gary Remlinger

A Carnation native, Gary Remlinger and the Remlinger family have been farming in King County for four generations. In 1965, Gary purchased Remlinger Farms with money he earned from a high school FFA project. The farm was originally intended to grow products to sell at a roadside fruit stand and to provide a home for Gary, his wife Bonnie and their family. The farm is a 350-acre working farm, listed in the Library of Congress as a Local Legacies Project.

David Remlinger

Son of Gary Remlinger, David owns Lord Hill Farms in Snohomish and also works with the Skykomish Habitat Mitigation Bank, which is a collection of restored riparian habitats, newly created stream channels and reconnected floodplain wetlands on the Skykomish River. The preservation, enhancement, restoration and creation of this area is designed based on Washington state's rule on wetland mitigation banking to offset impacts of proposed project activities on similar nearby ecosystems.

David Hopkins

Born and raised in Maine, David Hopkins moved to the Pacific Northwest as a young adult. A former Navy pilot, Hopkins now flies cargo for FedEx and operates a distillery in Snohomish, Wash. Hopkins buys all the ingredients used in his distilling business locally.

Vern Tillman

Raised in Yellowstone Park, Vern Tillman spent his adult life in the Redmond area, where he runs a company supplying farms and local businesses with packaging products. An avid sportsman and conservationist, Tillman is actively involved in the Eastside community.

Meeting 5: Vashon-Maury Island

December 14, 2015 – There were approximately forty attendees.

Comments on Comp Plan Public-Review Draft:

- In the draft Comp Plan it is hard to tell what info is new.
 - Staff explained how to read the document which is also detailed in the legend at the beginning of the document.
- Is a subarea plan the same as a service area?
 - Staff explained the difference between a subarea plan (in general a subarea plan is detailed plans prepared for a smaller geographic area within a community. The areas can encompass neighborhoods, corridors, downtowns, or other types of special districts that show cohesive characteristics. Also referred to as sector, small area, character area, or specific area plans, subarea plans include a greater level of detail than a comprehensive plan, but deal with many of the same topics) and a service area (which could be the county as a whole, a community service area boundary - <http://www.kingcounty.gov/exec/community-service-areas.aspx> , a special purpose district, etc.)
- We used to have a community council and we would discuss & vote on items. Absent that, how will we vote on for instance, zoning changes?
 - Staff agreed the disbanding of the Vashon unincorporated Area Council indeed poses a challenge for the community but that the planning sub area plan process will be a yearlong process that will engage the public in multiple ways/times.
- Can you give me an example of a service area?
 - Staff explained a service area could be the county as a whole, a community service area boundary - <http://www.kingcounty.gov/exec/community-service-areas.aspx> , a special purpose district, or an area like a water shed that has a specific boundary, etc.
- How are rural areas defined? Density vs. Square miles of land?
 - Staff explained there are indeed a handful of rural zones in the rural area however....(did not get this answer down)
 - Arthur follow up question: Somewhere someone decided only 1 housing unit per 2.5 acres. Who decided that limit?
 - Staff explained the Comprehensive plan process in 1985 and 1994 and numerous community plans all had public input that went into creating these policies.
- Are you focusing on individual health or community health?
 - Staff – The primary focus is community health although we have some targeted programs that address individual health

- I like chapter 4 (Housing & Human Services) but there's nothing in this chapter about sustaining these services. I see prevention in there.
 - Staff – We need to get to less of a crisis state first but yes sustaining programs that have positive outcomes is important.
- What about health care?
 - Staff – Public health has been involved to an extent in some aspects of health care but with the exception of a few public health clinics we aren't a provider of health care services. There are health related issues in the plan that we (Dept. of Community & Human Services) partner with public health on. Health care is mostly state and federal .
- Pesticides for noxious weeds?
 - Staff – Yes for some the only way to remove them is with pesticides but we try to use ground cover, etc. unless its aggressively invasive then we use pesticides in some areas.
- SWM Facilities?
 - Staff – We do manage catch basins, etc.
- Noxious Weeds – Do we get federal grants?
 - Staff – Yes it's a cost share program, we partner with property owners and focus on things like river corridors. Most of this work is done on private property and focus on things like river corridors, most of this work is done on private property.
- Are there zoning changes?
 - Staff – Not on Vashon Island. There will probably be less than 10 parcels in the county that change as a result of this update to the comp plan.
- This plan is a good abstract but regarding nuts & bolts that relate to zoning and subdividing...nearly all construction has been single family expensive homes at the end of long driveways. Not a lot of multi-family housing or less expensive homes or lower cost rental units have been built on the island. It's mostly wealthy property owners. Water District 19 is going to serve everyone on the wait list in the next 10 years. So unavailability of water will change. Would like to see more affordable and alternative housing that serve more economically diverse populations. Zoning at present was done before wetland and sensitive areas policies went into place so the areas in town that WERE set aside for more dense and diverse housing can no longer be built on as a result of those policies. So we need a remedy for this and would like to see more in the plan to address this.
 - Staff – these topics, housing, housing affordability, zoning – are all topics that will likely be discussed in the sub area planning process in 2016.
- Will there be legislation for some of these policies?
 - Staff – Yes.
- Alternatives to septic – like composting toilets, incinerating toilets, etc. The county rules should be flexible and not an onerous one size fits all. There should be more environmentally friendly options and less restrictive options and more customizable options. The county should pursue pilot projects to test some of these options.

Meeting 6: East Cougar Mountain Potential Annexation Area

January 28, 2015 – There were approximately seventy attendees.

Note: On December 8, 2015, the City of Issaquah submitted a letter to King County requesting that the East Cougar Mountain area be removed from the City's Potential Annexation Area (PAA). Were this to occur, the land use on all or a portion of these properties would change from urban to rural. As this was submitted during the Public Comment Period, King County held an additional public meeting to solicit community input, with public comment accepted until February 3, 2016.

Twenty attendees testified during the meeting.

- Question: If the Urban Growth Area is decreased here, does it increase the likelihood that other PAAs would be expanded?

Answer: No. King County does not have a provision in its Comprehensive Plan, or in the Countywide Planning Policies, with a 1-to-1 change in the Urban Growth Area, although it does have a discretionary Four to One program. The applicable Countywide Planning Policy states:

DP-18 Allow redesignation of Urban land currently within the Urban Growth Area to Rural land outside of the Urban Growth Area if the land is not needed to accommodate projected urban growth, is not served by public sewers, is contiguous with the Rural Area, and:

- a) Is not characterized by urban development;*
- b) Is currently developed with a low density lot pattern that cannot be realistically redeveloped at an urban density; or*
- c) Is characterized by environmentally sensitive areas making it inappropriate for higher density development.*

Also, both the City and the County have adequate capacity for growth within existing areas and, in the case of the city, within its core and new urban center.

- Support for removal of land from PAA; and thank you to City of Issaquah for making this decision. The City, and the area, cannot handle urban services, development would harm natural areas, and development on steep slopes and critical wetlands would be inappropriate and dangerous. As the region grows, the need for open spaces all grows and this change will help accommodate that need. Ability to be in nature is important. Continue to focus growth into the existing City. (A couple of subsequent commenter's simply stated their concurrence with this testimony, or made similar comments).
- Concerned about City oversight to keep these safe; Talus Parcel Nine hill slide is an example of the challenge and that will affect resident's tax bills. These parcels are even steeper and wilder. The expense of water, sewer and other services would be very high for limited gain to residents. Support for change to Rural Area. Thank you City to taking this position.
- Third generation owner, with a number of other family members. Support for previous comments, but wants the development potential retained on one parcel, number 2924069011, so that it can either be sold (perhaps to King County) or developed and the value used to take care of elderly parents. The lot potentially supports 2 to 3 developable lots. May want to connect to adjacent parcel which is slated for future development (the Bergsma development) that was annexed into

the City although were not aware of this. This new development may provide road access, or they might have road access through the adjacent park parcel. (A couple of subsequent commenter's stated their concurrency with this testimony).

- Need to protect these areas, help homeowners adjust their expectations. Maybe they can use tools to reduce taxes since their development potential is lower. There has been a lot of development outside the city core, and there is interest in slowing development overall. We should not even consider growth in this area.
- Lives in edge of PAA, support for additional land to be added to Cougar Mountain Park. Additional density would harm the area. Grow inside core of city. Work with owners to annex areas into the park, and make it affordable to them. Look at other areas, such as SR 900, for more trailheads and park access.

- Question: How could County decide whether to take all or a part of the area?

Answer: No decisions have been made yet. There are different current zoning and land use categories. Some parcels are developed and some are vacant. Some have steep slopes and some are flatter. These are all factors in King County's decision. The testimony tonight and subsequent comments will help us make a recommendation.

- Student at Green River Community College suggested this decision and subsequent activities are related to King County's Strategic Climate Action Plan, which calls for conservation of open space lands.
- Resident from East Renton Area – When making this decision, King County needs to weigh affect on other similar areas, such as the East Renton Plateau Potential Annexation Area. By shrinking the Urban Growth Area, this could create additional pressure for development in other rural or edge communities. This could affect areas such as the E. Renton Plateau which is adjacent to rural. Need to make decision intelligently, residents voices are heard, talk about longer-term impacts in other similar areas.

- Question: would this be the only "Rural Island" if approved? These areas have different needs to protect them.

Answer: No. there are pockets of Rural Area zoned properties in the county that are surrounding by other land uses, near locations such as Woodinville, Duvall, Sammamish, Snoqualmie, North Bend, Black Diamond, Auburn, and Enumclaw. Rural Area zoned properties can be surrounded by mining, open space, agriculture, cities, and forest lands.

- Question: Proposal makes a lot of sense, and can probably support removal of PAA but want to know what this means for my land use. What uses would change? Would livestock be allowed? Can residents add onto their houses? Can we still have a community well? (Subsequent commenter's asked similar questions).

Answer: Land uses may change as a result of the removal of PAA .Typical zoning designation in East Cougar Mountain Area is primarily Residential 1. The land use table below indicates the difference between the current Urban Residential zoning of R1 and the potential future Rural Area zoning designation of RA-5. (This is used for illustrative purposes only. Please review KCC Title 21A for additional footnotes that apply to specific sized parcels)

21A.12.030 Densities and Dimensions- Residential and Rural Zones	R-1	RA-5
Base Density: Dwelling Unit/Acre:	1 du/ac	0.2 du/ac
Minimum Lot Area:	N/A	3.75 ac

Minimum Lot Width:	35 ft.	135 ft.
Minimum Street Setback:	20 ft.	30 ft.
Minimum Interior Setback:	5 ft.	10 ft.
Base Height:	35 ft.	40 ft.
Maximum Impervious Surface:	30%	20%

- City of Bellevue Resident – there are three different types of areas: developed area, large lots, undeveloped (the Precipice). There are unique old growth properties in the areas; these are special areas that should not be developed. There is a property owner currently platting some parcels to the East for development (Bergsma) that will leave a lot of steep slopes undeveloped. It's too steep; they cannot put in any houses and cannot put in roads. Precipice is fully surrounded by King County park land. The whole area should remain as rural.
- Commenter has been involved in city leadership for many years; this involved 18 years on City Council they discussed addressing this for many years. It's time to face reality - the city cannot afford to support development of these parcels. Getting water to and from the property. Getting the roads to urban properties would bankrupt the city. Agrees that attention needs to be paid to parcel number 2924069011. It's right next to the park and the Bergsma property which has homeless camps on their property.
- Question: What effect would this change have on the Edgehill Addition's water system; would they be able to participate in the Cascade Water Alliance? Closest water line is in Bellevue; how would this affect ability to connect to their system?

Answer: What will not change is your zoning; the Urban Reserve is 1 unit per 5 acres, and the zoning would likely be RA-5 which is also 1 unit per 5 acres. We allow public water, but not sewers. Could keep your well, could bring in piped water. This would not affect your ability to have piped water, but ability to connect to City water would be a decision of the decision. The County approves water plans in unincorporated, meaning we would work with City to replace wells if they fail.

- Answer: Regarding allowed uses, provided below are descriptions of Urban Residential zones and Rural Area zones identifying the purposes of each of these categories of zoning. Also below are some examples of the most common permitted Residential uses in RA-5 zoning classification, and are as follows: (Please Note that this is used for illustrative purposes only and does not capture all specific land use tables in KCC 21A.)

King County Code 21A.04.060 Rural area zone.

A. The purpose of the rural zone (RA) is to provide for an area-wide long-term rural character and to minimize land use conflicts with nearby agricultural or forest production districts or mineral extraction sites. These purposes are accomplished by:

1. Limiting residential densities and permitted uses to those that are compatible with rural character and nearby resource production districts and sites and are able to be adequately supported by rural service levels;
2. Allowing small scale farming and forestry activities and tourism and recreation uses that can be supported by rural service levels and that are compatible with rural character;
3. Increasing required setbacks to minimize conflicts with adjacent agriculture, forest or mineral zones; and
4. Requiring tracts created through cluster development to be designated as permanent open space or as permanent resource use.

B. Use of this zone is appropriate in rural areas designated by the Comprehensive Plan as follows:

1. RA-2.5 in rural areas where the predominant lot pattern is below five acres in size for lots established prior to the adoption of the 1994 Comprehensive Plan;
2. RA-5 in rural areas where the predominant lot pattern is five acres or greater but less than ten acres in size and the area is generally environmentally unconstrained;
3. RA-10 in rural areas where the predominant lot pattern is ten acres or greater but less than twenty acres in size. RA-10 is also applied on land that is generally environmentally constrained, as defined by county, state or federal law, to protect critical habitat and regionally significant resource areas (RSRAs). The RA-10 zone is also applied to lands within one-quarter mile of a forest or agricultural production district or an approved long-term mineral extraction site. On Vashon-Maury Island RA-10 zoning shall be maintained on areas zoned RA-10 as of 1994 and on areas with a predominant lot size of ten acres or greater that are identified on the Areas Highly Susceptible to Groundwater Contamination map; and
4. RA-20 in Rural Forest Focus Districts designated by the King County Comprehensive Plan.

King County Code 21A.04.080 Urban residential zone.

A. The purpose of the urban residential zone (R) is to implement comprehensive plan goals and policies for housing quality, diversity and affordability, and to efficiently use urban residential land, public services and energy. These purposes are accomplished by:

1. Providing, in the R-1 through R-8 zones, for a mix of predominantly single detached dwelling units and other development types, with a variety of densities and sizes in locations appropriate for urban densities;
2. Providing, in the R-12 through R-48 zones, for a mix of predominantly apartment and townhouse dwelling units, mixed-use and other development types, with a variety of densities and sizes in locations appropriate for urban densities;
3. Allowing only those accessory and complementary nonresidential uses that are compatible with urban residential communities; and
4. Establishing density designations to facilitate advanced area-wide planning for public facilities and services, and to protect environmentally sensitive sites from over development.

B. Use of this zone is appropriate in urban areas, activity centers, or Rural Towns designated by the Comprehensive Plan as follows:

1. The R-1 zone on or adjacent to lands with area-wide environmental constraints where development is required to cluster away from sensitive areas, on lands designated urban separators or wildlife habitat network where development is required to cluster away from the axis of the corridor on critical aquifer recharge areas, and on Regionally and Locally Significant Resource Areas (RSRAs/LSRAs) or in well-established subdivisions of the same density, which are served at the time of development by public or private facilities and services adequate to support planned densities;
2. The R-4 through R-8 zones on urban lands that are predominantly environmentally unconstrained and are served at the time of development, by adequate public sewers, water supply, roads and other needed public facilities and services; and
3. The R-12 through R-48 zones next to Unincorporated Activity Centers, in Community or Neighborhood Business Centers, in mixed-use development, on small, scattered lots integrated into existing residential areas, or in Rural Towns, that are served at the time of development by adequate public sewers, water supply, roads and other needed public facilities and services.

P-Permitted			
C-Conditional			
S-Special Use			
KCC 21A.08.030 Residential Land Uses			
SIC #	SPECIFIC LAND USE	R1-8	RA-5
	<u>DWELLING UNITS, TYPES:</u>		
*	Single Detached	P-C12	P-C12
*	Townhouse	P11-C12	C4

*	Apartment	P5-C5	C4
*	Mobile Home Park	C8	S13
*	Cottage Housing	P15	
	<u>GROUP RESIDENCES:</u>		
*	Community Residential Facility-I	P14-a c	C
*	Community Residential Facility-II	P14-b	
*	Dormitory	C6	C6
*	Senior Citizen Assisted Housing	P4	
	<u>ACCESSORY USES:</u>		
*	Residential Accessory Uses	P7	P7
*	Home Occupation	P18	P18
*	Home Industry	C	C
	<u>TEMPORARY LODGING:</u>		
7011	Hotel/Motel (1)		
*	Bed and Breakfast Guesthouse	P9	P9
7041	Organization Hotel/Lodging Houses		

See King County Code 21A.08.030 for additional information on the meaning and terminology for these zoning categories.

- Long-time resident; we bought this property (the Bergsma property) for development and, even with slopes, we have some development potential that we want to realize. This has been in family for generations and extended family is interested in selling. Understands his neighbor's concerns, and supports some areas to remain rural, but he wants his property to remain urban so his family can see return on investment.
- Resident from East Renton Area – Knows some of the problems with annexation to cities. Advises residents to figure this out on their own. Need to consider how this affects roads. He serves on the King County Roads and Bridges Task Force is recommending that areas move forward on annexation to get better road services; this area may go in the opposite direction. Probably would make sense to stay with Issaquah to get better road service.
- Question: Resident noted that he had not heard of the meeting until just today and some of his neighbors in the PAA did not know about the meeting; how did the County notify people?

Answer: King County notified community members in a number of ways – about 550 postcards were sent to properties in the PAA as well as the surrounding 500 feet, an email was sent to the Comprehensive Plan mailing list which has almost 600 emails, and an advertisement was placed in the weekly Issaquah Valley Reporter. Last, the City of Issaquah mailed to their mailing list which included an additional 600 emails. The advertising for this meeting was larger than any other individual meeting, given the shorter timeframe.

V. INFORMATION REGARDING PUBLIC PROCESS

The following graphics illustrate some of the components of the Public Participation process.

Example of Advertisements

Examples of Postcards

Examples of eNewsletters

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WORK CONTINUES TO UPDATE THE COMPREHENSIVE PLAN
King County departments have been hard at work over the past few months reviewing the Comprehensive Plan and considering changes to address [Council Motion 14361](#), the adopted Scope of Work. As noted in the May e-newsletter, the motion identified a number of specific [land use proposals](#), a wide variety of policy topics and a small set of potential code amendments.

COMMUNITY MEETINGS SCHEDULED FOR PUBLIC REVIEW DRAFT
King County will release the 2016 Comprehensive Plan Public Review Draft on **November 6, 2015**, via the County's [website](#) and through an email notice sent to the mailing list (note: if you are receiving this e-newsletter, you are already on the mailing list). Following release, the County has scheduled four community meetings to share the draft Plan and listen to community comments.

<ul style="list-style-type: none"> Vashon/Maryland Island Monday, November 9 6:30 to 8:30 PM McMurray Middle School 9320 Conarney Road SW, Vashon 	<ul style="list-style-type: none"> West Hill/North Highline/West King Thursday, Nov. 19 6:30 to 8:30 PM Fire District 22 Administration Building 12424 76th Avenue South, Slayney
<ul style="list-style-type: none"> Four Creeks/Maple Valley/SE King County Tuesday, November 17 6:30 to 8:30 PM Maple Valley Sheriff Precinct 3 22300 SE 231st, King County 	<ul style="list-style-type: none"> Snoqualmie Valley/Bear Creek/Sammamish Wednesday, December 2 6:30 to 8:30 PM Fall City Fire Station No. 27 4301 334th Place SE, Fall City

The Public Comment Period will continue until **January 6, 2016**. After this, departments will finalize the "Executive Recommended Draft" and transmit to the County Council on **March 1, 2016**.

COMPREHENSIVE PLAN DOCKET REQUESTS
In addition to Motion 14361, the update responds to requests submitted through the Docket Process. Required by the Growth Management Act, the Docket allows citizens to [submit requests](#) to the Plan, land use designations or development regulations.
If the docket requires a change to a land use designation, those who submitted the docket are referred to the second step, which is the process for obtaining a site-specific land use amendment (the same applies for rezoning requests). The 2015 requests are found [here](#).
For the King County Code, the Executive will transmit the "Executive Docket Report" to the County Council on the first business day of December. Prior to that, responses will be provided to those who submitted the Docket requests.

GET INVOLVED!
If you are interested in meeting with County staff to discuss the update, email to compplan@kingcounty.gov and feel free to share this email and have others join the mailing list and the update process.
To unsubscribe, send an email to the address below.

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COMMENT PERIOD ON PUBLIC REVIEW DRAFT
Following release of the Public Review Draft of the 2016 Comprehensive Plan on November 6, King County hosted five community meetings. Approximately two hundred people attended and discussed the draft. The meeting agendas included open house time for attendees to talk to County staff, an interactive presentation where attendees asked questions and made comments, and time for discussion of issues other than the Comprehensive Plan.
The discussions at each of the meetings varied. Some focused primarily on the proposed policy amendments with a lot of dialogue about annexation, the environment, affordable housing, homelessness and social equity issues. Other meetings focused on the site-specific land use proposals, particularly those associated with proposed changes to the urban growth area.
Staff has posted the presentation on the Comprehensive Plan website, and will provide a summary of all of the meetings as well as a verbatim record of all written comments when the Executive Recommended Plan is transmitted to the County Council at the beginning of March 2016.

Additional Proposal: Removal of Cougar Mountain North PAA
On December 8, the City of Issaquah submitted a letter to King County requesting that the East Cougar Mountain area be removed from the City's Potential Annexation Area. The letter states that after review by the City in its most recent comprehensive plan update, as well as discussions with the City of Bellevue dating back until 2007, the City of Issaquah is not interested in annexation and would like the 770-acre area removed from the urban growth area boundary.
King County is working to schedule a public meeting in the local area, likely during the week of January 18 to 22, to solicit community input on this request before the Executive Recommended Plan is transmitted in March. The date and location of the meeting will be posted on the Comprehensive Plan website as soon as it is finalized.

Share Your Thoughts until January 6
The extended public comment period goes until **January 6**. After this, comments will be carefully reviewed and the Executive Recommended Plan transmitted to the Council on March 1, 2016.
Visit: <http://www.kingcounty.gov> and search on Comprehensive Plan.

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Planning in King County
Prompted by residents' concerns about sprawl, King County adopted its first comprehensive land use plan in 1964 and, in 1965, established an urban growth area to focus growth and investments. The 1965 plan also established policies to preserve the rural area, conserve the natural environment and designate resource lands for long-term agriculture and forest production.
These strategies continue to guide the comprehensive plan, which now responds to requirements in the Growth Management Act (1990). The Plan has been updated multiple times since then to address issues such as climate change, social equity and public health, as well as new expectations in countywide and multicounty policies.

What does the Plan Do?
Counties play multiple roles - they are a local government in unincorporated urban, rural and natural resource areas as well as a regional service provider for the entire county geography. In this context, the Comprehensive Plan guides local land use decisions such as subdivision, permitting and zoning, or land use designation. It also guides the provision of regional services such as transit, parks, solid waste and the establishment of the urban growth area boundary.
For regional services, the Plan seeks efficiencies by concentrating investments and services to support the land use vision and focus growth in and near cities where local services are located or can be made available.

Major Themes in 2012 Plan
The currently adopted Plan focuses on creating a sustainable King County, and contains text, maps and policies that are organized around the following major themes:

- Creating Sustainable Neighborhoods
- Preserving Open Space
- Directing Development Towards Existing Communities in the Urban Growth Area
- Providing a Variety of Transportation Choices
- Addressing Health Disparities
- Addressing Equity, Social and Environmental Justice
- Achieving Environmental Sustainability
- Managing Performance

These themes seek to ensure that King County will manage growth in ways that improve the quality of life and the natural environment for future generations. These themes align with the county's Strategic Plan, the Growth Management Act, and Countywide and Multicounty Policies.

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State Requirements for Comprehensive Plans
Washington's Growth Management Act requires most counties and cities in the state to prepare comprehensive plans to manage future growth. The Act requires each plan to include chapters on land use, transportation, housing, capital facilities and utilities that show where future population growth will occur and the types of infrastructure the city will need to provide to serve that growth.
Summary of GMA Planning Goals:
• Reducing low-density sprawling development.
• Encouraging development in urban areas where facilities and services already exist or can be efficiently provided.
• Maintaining transportation, housing and open space opportunities.
• Protecting property rights.
• Protecting the natural environment.
Plans often contain optional chapters related to the environment, the economy and parks and recreation.

Accommodating Growth in King County
The County has seen large population increases over the past decades; this is expected to continue in the coming years.
• **Where We've Been** - Consistent with the Growth Management Act's directive to focus growth and transition unincorporated urban areas through annexation and incorporations, county residents now predominantly reside in cities - a significant change from the past.
• **Where We're Going** - Shown below are the Adopted 2012-21 Growth Targets consistent with the countywide and multicounty planning policies. These targets are the land use assumption that guide each chapter in the comprehensive plan.
Looking forward, the cities will continue to play an even larger role as they are targeted to accommodate 95% of new housing and 90% of new jobs.

Location	New Housing	New Jobs
12 Cities with Urban Centers	181,635	368,690
20 Other Cities in USA	31,867	46,873
7 Rural Cities	7,085	5,055
Unincorporated USA	12,470	8,410
KC Total	233,077	428,028

2016 Plan Update
Comprehensive plans are long-range land use and service delivery guides; however, they work best when periodically revisited and updated to address new challenges and changing circumstances. Under state law, major periodic updates are required every 8 years. King County met this requirement with the adoption of the 2012 plan.
To keep the plan more current and relevant, the King County code requires a review every four years and this process is currently underway. The diagram below provides an overview of the update timeline.
During this process, public comment will be accepted on an ongoing basis. Visit the King County Comprehensive Plan website for a more detailed calendar.

Get Involved Visit <http://www.kingcounty.gov> and search on "Comprehensive Plan."

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These simple communication mediums were intended to improve public understanding of the current Comprehensive Plan and the proposed amendments.

King County
Comprehensive Plan
2016



King County