

Greater Maple Valley Area Council  
P.O. Box 101  
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January 26, 2004

Paul Reitenbach  
Department of Development & Environmental Services  
900 Oakesdale Avenue SW  
Renton, WA 98055-1219

Mr. Reitenbach,

Please consider the comments herein as the official response from the Greater Maple Valley Area Council (GMVAC) regarding the 2004 Update to the King County Comprehensive Plan.

We want to compliment and thank Karen Wolf and you and your group within the Department of Development & Environmental Services for their work in the 2004 update. Changes in Chapter 3--*Rural Legacy and Natural Resource Lands* were rather minimal and, in our view, that is good because it provides citizens with a stable basis in land use and zoning policy. That said, however, we are concerned with continual "tweaking" of the Comprehensive Plan, including the 2004 Update. There appears to be a slow creep toward "softer" policies, instead of continued protection of Rural Area, Resource Lands, and Forest Production and Agricultural Production Districts. We think most of these changes are/were unnecessary and could easily lead to serious unintended consequences. We also believe County Code should be consistent with policy, rather than the other way around.

The GMVAC has done periodic Advisory Ballot surveys of our constituents for many years. Results of these surveys have been very consistent over that time. We have used those recurring results to develop a set of defining principles on growth in the Rural Area:

1. Maintain privacy and rural character.
2. Preserve surrounding environment.
3. Maintain 5-acre minimum zoning for new construction.
4. Keep urban-type infrastructure to the absolute minimum (e.g., no sewers, no public water, country roads).
5. Allow no Transfer of Development Rights within or between the Rural Area and Forest Production District (FPD).

The GMVAC has applied the above Rural Area defining principles as a filter in reviewing the 2004 Update. The following details our specific comments and recommendations by Section and Policy number (please note these comments and recommendations pertain to Chapter 3--*Rural Legacy and Natural Resource Lands*):

#### Section II--Rural Densities and Development

R-201 (pg. 3-10) re: Low growth rate in the Rural Area.

We want to ensure all possible tools are used to limit growth in the Rural Areas. We recommend the following changes: (1) In the second to last sentence "may" should be changed to "shall" and (2) in the last sentence "level-of-service standards" be augmented and clarified by adding: "e.g., no sewers, no public water, no major roads, no TDR exchanges within or between the Rural Areas and the FPDs."

R-209 (pg. 3-12) and R-217 (pg. 3-14) re: TDR receiving sites.

We do not want to see TDR receiving sites to be RA-2.5. We recommend restoring RA-5 language and deleting paragraph (a.) of R-217 in its entirety.

R-213 (pg. 3-13) re: TDRs.

We do not want to see TDRs completed within the Rural Area. We recommend the last sentence be deleted in its entirety.

### Section III--Rural Public Facilities and Service

R-303 (pg. 3-18) re: Improvements to the transportation system outside the UGA.

This has been proposed to be deleted in its entirety and not replaced. We recommend R-303 not be deleted because it would subject the Rural Area to Urban-level roads potentially crisscrossing our landscape. This level of urbanization is not what our constituents desire, nor prudent.

### Section IV--Rural Cities, Towns, and Neighborhoods

R-413 (pg. 3-23) re: Regulations for non-vested industrial uses in the Rural area.

These non-conforming activities should not be permitted in the Rural Area. We recommend the last sentence on pg. 3-23 following R-413 be changed as follows: replace “is not encouraged” with “shall not be permitted.”

### Section V--Resource Lands

R-521 (pg. 3-29) re: FPDs.

This includes language stipulating, "new homes will be permitted on existing lots, but not on new lots created after December 31, 2003." This date was changed from December 31, 2001. The Executive's study has now been completed, but it was based on information up to 2001. We do not want the date slipped to 2003, thereby effectively “grandfathering” another two years worth of lots that have been formalized. We recommend the date in the last sentence remain “December 31, 2001” as it was in the 2000 and 2002 Comp Plans.

In summary, we are pleased to see there are no major changes in the 2004 Update. We request you give due consideration to our detailed comments and recommendations. However, we still are concerned there seem to be continual piecemeal changes in every update. These seemingly small changes add up to a significant change in policy over time, often in a direction not desired by residents in the Rural Area. Thank you for taking our comments and recommendations.

Original signed by and mailed 1/27/04

Richard Bonewits

Chairman, Greater Maple Valley Area Council

cc: King County Executive Sims

Councilman Phillips, King County Council Chair

Councilman Constantine, King County Council GM&UA Committee Chair

Councilman Irons, King County Council GM&UA Committee Vice Chair

Stephanie Warden, Director – King County Department of Development & Environmental Services