

In general, there is much to support in the 2012 major 4-year Update to the King County Comprehensive Plan (KCCP). However, there are some specific concerns in the following policy areas: Placement of urban Schools and other urban Facilities in the Rural Area; Environmental habitat protection; Park maintenance; Travel forecasting; Transportation Concurrency; Water systems; and Area Zoning Studies.

In the following please find our detailed recommendations for Chapters 3, 4, 6, 7, and 8, along with the Appendix Area Zoning Studies. Please note that Update language is in **black** with GMVUAC Comments in **green** and remaining Questions in **red**.

CHAPTER 3 -- RURAL AREA AND NATURAL RESOURCE LANDS

I. Rural (~~Legacy and Communities~~) Area

A. Rural Legacy and Communities

R-101 King County will continue to preserve and sustain its rural legacy and communities through programs and partnerships that ((by)) support((ing)), preserve, and sustain its historic, cultural, ecological, agriculture, forestry, and mining heritage; including but not limited to ((through collaboration with)) the King County Landmarks Commission, 4Culture, local and regional preservation and heritage programs, and other interested stakeholders. ((unincorporated area councils, community organizations, rural residents, and rural business owners, including forest and farm owners, and rural communities, towns, and cities)).

Retain last strikethrough list of “stakeholders” such as the UACs.

B. Rural Character

(2nd paragraph): Last 3 sentences are duplicated in the next paragraph that is proposed to be added.

Public Engagement

(1st paragraph): Retain description of the 4 Rural UACs that is proposed to be removed.

II. Rural Designation

A. Rural Area Designation Criteria

B. Forestry and Agriculture in Rural King County

1. Forestry

2. Farming

C. Equestrian Activities

III. Rural Densities and Development

A. Rural Growth Forecast

(last para. just before R-301): “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.”

We oppose the use of “annual limits” on issuance of new building permits

B. Residential Densities

(para. just before and including R-303): ~~“(Future development in the Rural Area will, ... increasing road capacity, meaning that these zones will remain out of compliance.)”~~ ~~“(Concurrency certificates for proposed new subdivisions in the Rural Area shall not be issued if trips generated by such subdivisions would exceed rural transportation level of service standards.)”~~

Even though much of the words on Transportation Concurrency were moved to Chapter 7--Transportation, they still should be retained here or specific Chapter 7 references should be included here.

C. Transfer of Development Rights Program

1. Sending and Receiving Sites

(Former R-317a): What happened to the 1:5 acre ratio?

~~“(R-317 For transfer of development rights purposes only, qualified sending sites are allocated development rights as follows:~~

~~a. Sending sites with Rural Area or Agricultural zoning shall be allocated one TDR for every five acres of gross land area;~~

2. Rural and Resource Land Preservation TDR Program

R-321 The Rural and Resource Land Preservation TDR Program shall include, but is not limited to, the following:

b....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;...

Why?

D. Nonresidential Uses

R-325a Schools and other public facilities may not be located in or impact Agricultural Production Districts or Forest Production Districts.

The GMVUAC strongly supports this proposed good policy and would like to see it impact any future school permitting decisions for the YarrowBay/Black Diamond MPDs, especially along Green Valley Road’s APD. Schools should be subject to Transportation Concurrency, since they greatly impact traffic during the morning

commute.

E. Character/Development Standards

F. Sustainable Development

G. (~~Low Impact Development~~) Surface Water Management

IV. Rural Public Facilities and Service

V. Rural Commercial (*sp?*) Centers

A. Rural Neighborhood Commercial Centers

R-501 *The Rural Neighborhood Commercial Centers designated on the Comprehensive Plan Land Use Map are small-scale business areas that should provide convenience shopping and services for the surrounding community. No new Rural Neighborhood Commercial Centers are needed to serve the Rural Area. Expansion of the boundaries of the existing Rural Neighborhood Commercial Centers shall not be permitted except through the subarea plan process.*

We support this policy.

R-503 *King County should adopt commercial development standards for Rural Neighborhood Commercial Centers that facilitate economic reuse of existing structures, minimize increases in impervious surfaces, and encourage retention of historic character and scale. Urban-level parking, landscaping, and street improvement standards are not appropriate for Rural Neighborhood Commercial Centers except as demonstrated as being needed to address the safety of the public.*

Existing vegetation should be considered adequate or the introduction of native plants.

B. Rural Towns

C. Rural Cities

(2nd paragraph): Restore the word “roads” -- “Excessive growth in rural cities and Rural Towns, however, may create pressure for extending urban services (for example, (~~roads~~) sewers) across the Rural Area or Resource Lands, may increase conversion pressure on nearby Resource Lands and adversely affect rural character.”

This policy does not work in practice as it has no teeth to back it up in the KC Code:

R-510 *The rural(~~incorporated~~) cities and their rural city Urban Growth Areas (~~shall be~~) are considered part of the overall Urban Growth Area for purposes of planning land uses and facility needs. King County should work with rural cities 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.

D. Non-Resource Industrial Uses and Development Standards in the Rural Area

E. Promoting Public Health in the Rural Area for All

VI. Resource Lands

A. Ensuring Conservation and Productive Use of Resource Lands

~~(A.)~~ B. Resource Conservation Strategy

~~(B.)~~ C. Forestry

1. Protecting Forest Lands
2. Promoting Forest Management

C. Agriculture

1. Protecting Agricultural Lands
2. Sustaining Agriculture and Farming
3. Agriculture and the Food System

D. Mineral Resources

CHAPTER 4 -- ENVIRONMENT

I. Natural Environment and Regulatory Context

A. Integrated Approach

B. Policy and Regulatory Context

1. Endangered Species Act
2. Clean Water Act
 - a. National Pollutant Discharge Elimination System
 - b. Water Quality Standards and Total Maximum Daily Loads
3. Growth Management Act and Critical Areas Protection
4. Shoreline Management Act
5. Puget Sound Partnership

II. Climate Change

Climate Change Science and Impacts
King County Greenhouse Gas Emissions
Government Operations
Countywide
Preparing for Climate Change Impacts
Status of King County Climate Change Efforts

A. Assessment

(p. 4-25, E-201): King County shall assess and publicly report both normalized

and total energy usage and total greenhouse gas emissions associated with government operations as well as countywide greenhouse gas emissions associated with resident, business, and other local government activities.

KC should commit to a periodic schedule here to provide relevant information to support energy and climate programs.

B. Reducing Greenhouse Gas Emissions

Government Operations

Countywide

(p. 4-30, E-205c): King County will work with King County cities and other partners to establish a greenhouse gas emissions inventory and measurement framework for use by all King County jurisdictions to efficiently and effectively measure progress toward countywide targets.

How and when will this be done?

New Development

We have a general concern here. KC has very little control over how Cities impact County infrastructure, such as its road network. The proposed MPDs in Black Diamond make this point in spades. All proposed mitigation (and insufficient at that) is on State roads, not County roads. Such blatant disregard for the amount of traffic to be generated and thus, GHG emissions, tend to render other County GHG emission reduction initiatives rather moot.

C. Adaptation

Built Environment

Natural Environment

Public Health

D. Collaboration with Others

E-217e: King County should encourage its electricity suppliers to provide energy efficiency, renewable energy and mitigation for electricity sources that are powered by natural gas and coal. In addition, King County should encourage the state to require new fossil fuel power plants to mitigate for their carbon dioxide emissions.

Possible forms of mitigation should be listed and described, The state is phasing out coal powered plants (although not natural gas).

~~E-218 (removed): King County should participate in carbon markets, and in doing so, should help to develop effective carbon emissions accounting methodologies that recognize the unique emissions profiles of local and regional governments. King County should partner with other governments, institutions and organizations on further development of effective and efficient rules for emissions trading.))~~

KC still should take an active role here even though in some carbon markets

local governments are excluded from being direct participants.

III. Air Quality

A. Overview

B. Ozone, Fine Particulate, Toxics

IV. Land and Water Resources

A. Conserving King County's Biodiversity

1. Biodiversity

2. Climate Change and Biodiversity

3. Biodiversity Conservation Approaches

a. Landscape Context

b. Habitat connectivity

c. Ecosystem Resilience and Natural Processes

d. Decisions in the Face of Uncertainty

e. Rare Ecosystems, Habitats, and Species

f. Integrated Land and Water Management and Planning

g. Habitat and Development

h. Non-Native Species

i. Adaptive Management

4. Fish and Wildlife Habitat Conservation Areas

a. Federal and State Listed Endangered, Threatened, and Sensitive

Species

E-418d: The seasonal ranges and habitat elements where federal and state listed endangered, threatened and sensitive species have a primary association should be identified, mapped and designated as Fish and Wildlife Habitat Conservation Areas.

Funding sources should be listed and described.

b. Species and Habitats of Local Importance

(p. 4-67, 1st & 2nd paras. of sect.):

The second paragraph should be deleted.

c. Wildlife Habitat Network

B. Stormwater Quality

(pp. 4-75 & -76, E-419):

References to the Surface Water Design Manual and the Stormwater Pollution Control Manual should not be removed.

C. Upland Areas

1. Forest Cover

2. Soils and Organics

D. Aquatic Resources

1. Watersheds

E-438: Watershed-based plans should define how the natural functions and values of watersheds critical to salmonids are protected so that the quantity and quality of water and sediment entering the streams, lakes, wetlands and rivers can support salmonid spawning, rearing, resting and migration.

The use of “and sediment” from the sentence above must be qualified, as sediments washed into the stream from construction projects smother salmon eggs.

2. Wetlands

E-451: Public access to wetlands for scientific, recreational, and traditional cultural use is desirable, providing that public access trails are carefully sited, sensitive habitats and species are protected, and hydrologic continuity is maintained.

Change “desirable “ to “allowed” or “acceptable”. It is not desirable for the public to tramp through wetlands. Who will monitor the conditions under which the public is allowed access?

E-453: Enhancement or restoration of degraded wetlands may be allowed to maintain or improve wetland functions and values, provided that all wetland functions are evaluated in a wetland management plan, and adequate monitoring, code enforcement and evaluation is provided and assured by responsible parties. Restoration or enhancement must result in a net improvement to the functions and values of the wetland system. (~~Technical assistance to small property owners—should be considered.~~)

Restore the last sentence on assistance to small property owners.

E-455: A small Category IV wetland that is less than 2,500 square feet and that is not part of a wetland complex may be altered to move functions to another wetland as part of an approved mitigation plan that is consistent with E-456 and E-457.

To ensure preservation of biodiversity, plants and animals and even soil from the altered site should be moved to the new mitigation site.

3. Lakes

4. Groundwater Resources

E-467: King County should protect groundwater recharge quantity by promoting low impact development and other methods that infiltrate runoff where site conditions permit(~~,except~~)and where pollution source controls and stormwater treatment can prevent potential groundwater contamination (~~cannot be prevented by pollution source controls and stormwater pretreatment~~).

Simply “promoting” LID is not sufficient. It is better not to build on/in aquifer recharge areas, because some contamination and loss of recharge capacity is unavoidable with development. Maps of aquifer recharge areas are still not

available to developers and they should be.

5. Rivers and Streams

(p. 4-91): In addition, public access to rivers and streams is a requirement of the Shoreline Management Act and a goal for King County to support the regional economy and provide recreational opportunities for the community.

Is the public allowed on private land? Do not access through private property.

E-472: 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.

Regardless of upland mitigation, buffers should not be eliminated.

V. Geologically Hazardous Areas

- A. Erosion Hazard Areas**
- B. Landslide and Avalanche Hazard Areas**
- C. Seismic Hazard Areas**
- D. Volcanic Hazard Areas**
- E. Coal Mine Hazard Areas**

IV (should be VI.) Monitoring and Adaptive Management

- A. Performance Measurement, Performance Management, and KingStat**
- B. National Pollutant Discharge Elimination System Compliance**
- C. Water Resource Inventory Areas Plan Implementation**

Habitats are continuing to decline and the funds to determine the possible causes and to provide remediation are insufficient or non-existent (ref.: pages 4-46 twice, 4-112, 4-115). Preservation of habitat, i.e., forested land is one of the best and cheapest ways to limit climate change.

- D. Effectiveness of Critical Areas Regulations**

GENERAL COMMENTS:

We recognize there is climate change, but are undecided how much is caused by man and how much is due to natural climate cycles. We request KC fully engage rural residents and UACs in discussions on climate change impacts in KC and what mitigations are being considered before any regulations are formulated and proposed. This will allow us to work together to find the best solutions for all residents of KC, urban and rural.

Preserving fish and wildlife should continue to be a high priority of preservation and protection efforts. The Growth Management Act was passed in 1990, almost 22 years ago, requiring that critical areas such as fish and wildlife habitat conservation areas be designated and protected. Yet E-418d says these areas should be identified. This should have been done by now.

Bears, cougars and bobcats are among the species left off the species of Local Importance list (E-418e) as are numerous bird species. We are concerned a particular species will nearly have to be wiped out before we make an attempt to protect them. Unfortunately, while monitoring of the environment is frequently advocated in this chapter, it is also stated funds will probably not be available.

Although King County is directed to protect the environment and habitats for wildlife, in actuality, Special Use and Conditional Use Permits allow development to take precedence over preserving the environment. An example of this is the issue of permitting schools for urban residents to be built in the Rural Area. And, despite the need for trees to counteract Climate Change, development continues unabated as more land is incorporated into cities. Once again, preserving fish and wildlife should continue to be a high priority, so that habitats do not continue to decline.

CHAPTER 6--PARKS, OPEN SPACE, & CULTURAL RESOURCES

I. Parks, Recreation and Open Space

A. The Regional Open Space System of Parks, Trails, Natural Areas and Working Resource Lands

P-102: King County shall be a regional leader in the provision of a regional open space system of parks, trails, natural areas, working resource lands, and flood hazard management lands. The regional network of open spaces provides benefits to all county residents including: recreation facilities, conservation of natural and working resource lands, air and water quality, flood hazard management and related programs(,) and services. Preservation will include wildlife corridors and riparian habitat, as well as open space areas separating Urban and Rural Areas. These vital regional parks, trails, recreational facilities, ((and)) natural and working resource((s)) lands contribute to the physical, mental and emotional well-being of county residents.

Take care of the parks and the mental and emotional well being of the residents will take care of itself!

B. Local Parks

P-103: King County shall provide local parks, trails and other open spaces in the Rural Area(~~(-Local parks, trails and other open spaces)~~) that complement the regional system. King County should shall provide ((be provided)) local parks, trails and other open spaces in each community in the Rural Area((s)) to enhance environmental and visual quality and meet local recreation needs. ((These vital local parks, trails, recreational facilities and natural resources contribute to the physical, mental and emotional

~~well-being of county residents.))~~

C. Components of the Regional Open Space System

3. Working Resource Lands

Forestland

P-114: Forest land owned by King County shall provide large tracts of forested property in the Rural Forest Focus Areas and the Forest Production District (FPD) that will remain in active forestry, protect areas from development or provide a buffer between commercial forestland and adjacent residential development.

This should include selective (but not clear cutting) logging practices and replanting of a great renewable resource.

D. Achieving the Open Space System

Managing the System

P-129: King County will adopt an entrepreneurial approach to managing and operating the open space system and work aggressively to implement multiple and appropriate strategies to fiscally sustain ((~~fiscally~~)) the open space system.

Does this include raising individual charge use fees for trails and picnic areas etc. ?

P-132: King County should work with cities to share operational and maintenance costs of parks and other open spaces in unincorporated areas in which a substantial portion of the users are from incorporated areas.

This needs to be more aggressive so that cities will change their pattern of relying on the rural county parks and ball fields and include more in their own development plans.

II. Cultural Resources

(2nd paragraph): Does this change mean that the Cultural Development Authority (CDA) has been ended and that there is no longer a working plan made directly with the county council members?

~~((P-202 King County shall support the transmission of the region's cultural legacy, promote cultural education, and encourage the preservation and celebration of cultural diversity and creativity.))~~

King County government ~~can~~ shall lead by example through stewardship and wise management of its own cultural resources. Historic public buildings and facilities, such as bridges and roads, can be preserved and continue to be used; other historic resources can be converted to public use.

A. Partnerships

P-204a: King County shall provide leadership in pursuing its cultural resource

goals by actively advancing the protection, enhancement, and ongoing use of County-owned and other cultural resources, and by promoting intergovernmental cooperation and partnerships for the preservation and use of cultural resources.

There seems to be a change of focus from providing cultural development, to providing leadership and partnering with others. Does this mean that the county will be less active and more promotional?

~~((C. Public Art~~

Does this mean that Public Art is no longer a focus of the county, or has it just been joined in with cultural preservation as a whole?

~~((F. Stewardship of Cultural Resources~~

This all seems to be a consolidation and hard to follow if it is being fully covered in the places it has been moved to.

REGIONAL TRAILS NEEDS REPORT

Improvement of trails should become more a maintenance of trails until the County can fund and take care of its road systems. Paving trails when you cannot take care of even reasonable repair of roads and highways is a wrong priority.

CHAPTER 7 -- TRANSPORTATION

I. Creating an integrated, sustainable transportation system that enhances quality of life

A. Introduction

B. Components of the Transportation Element

C. Consistency with Plans

D. Transportation system, services, and county responsibilities

1. Public Transportation

2. Road System

3. Air Transportation

4. Marine Transportation

E. System-wide Policy Guidance

II. Providing services and infrastructure that support the County land use vision

A. Land Use and Growth Strategy

[Please note in the following subsection on the important subject of "Travel Forecasts" we had an excellent Q&A discussion with KCDOT that is summarized below (red, blue, & green) with our final comments shown in brown.]

B. Travel Forecasts

(p. 7-21) 1st paragraph: *When a jurisdiction (e.g., Black Diamond) ignores*

PSRC growth targets and overburdens the KC road system, how is it accounted for in the TNR?

KCDOT/RSD Response: King County's capacity improvement projects in the TNR are based on the traffic forecasting and analysis the county performs for the Comprehensive Plan. In addition to the regionally adopted growth targets, the traffic forecast for the 2012 King County Comprehensive Plan update did take into account the higher growth assumptions of Black Diamond's Comprehensive Plan and the proposed new master planned developments (MPDs). No capacity deficiencies on unincorporated King County roads were identified in this analysis. Potential operational deficiencies, such as needs for signalization or intersection improvements, would require more detailed traffic studies that would not be part of the Comprehensive Plan process. Detailed studies of the impact of the MPDs on roads within and outside the city were done as part of the city's SEPA process for the developments.

GMVUAC Reply: The subject of Travel Forecasts of potential impacts generated by cities, particularly Black Diamond, adjacent to the Rural Area still troubles us. The GMVUAC has been involved in the proposed massive Master Planned Developments in Black Diamond for over two years and is very familiar with the DEISs, FEISs, Appeals of the FEISs, MPD Application Hearings, and Development Agreement Hearings. With that background, we take issue with two KCDOT/RSD statements above:

KCDOT/RSD Response: No capacity deficiencies on unincorporated King County roads were identified in this analysis.

GMVUAC Reply: The City's Hearing Examiner and KCDOT/RSD's Matthew Nolan found this not to be the case and provided expert testimony on same, especially WRT Green Valley Rd. In fact, in Mr. Nolan's recent Development Agreement Hearing testimony recommended that "*development be stopped*" on Green Valley Rd., if certain traffic thresholds were exceeded. The Black Diamond City Council ignored that testimony, as it did all of ours and all of Mr. Reitenbach's.

KCDOT/RSD Response: Detailed studies of the impact of the MPDs on roads within and outside the city were done as part of the city's SEPA process for the developments.

GMVUAC Reply: Although the City's Hearing Examiner found the FEISs "*adequate*" in Spring 2010, he also made stringent recommendations in simultaneous MPD Application Hearings. Those recommendations included

that a new "regional" Traffic Model be developed and validated before the Development Agreements were approved. He called for more realistic assumptions to be used, especially Internal Capture Rates, which had skewed the FEIS Traffic Analyses. He also called for Peak-Hour Factors to be evaluated, as well as Queue Lengths (as suggested by WSDOT). Unfortunately, during the subsequent MPD Application Hearings, the Black Diamond City Council threw out or drastically modified every one of those Hearing Examiner recommendations at the behest of the master developer, YarrowBay. The most critical of which was to delay the new Traffic Model, its validation, and use until 850 building permits had been issued (a ~50% increase in the city's population).

Because of rogue city actions like this, the GMVUAC believes the County is effectively powerless to ensure all Rural Area County roads emanating from Black Diamond will not suffer gridlock for decades to come. Our complaint is not with the County, but with the process. The KCCP's reach is insufficient to prevent this sort of thing from happening again and again. This is why we inquired about Travel Forecasts and the TNR. There appears to be a big disconnect in the process and, unfortunately, we don't see an easy way around it.

KCDOT/RSD Re-reply: The traffic forecasting for the 2012 King County Comprehensive Plan update is a high-level planning forecast and as such is not intended to address the detailed impacts of specific developments. The SEPA analysis for the Black Diamond MPDs is supposed to provide a much higher level of detail upon which to base on-the-ground decisions about the development and associated roads operational issues. Given the different levels of each analysis, it is quite possible that the SEPA process or other in depth analysis would identify impacts that the Comprehensive Plan forecasts would not. I'm sorry to hear that the SEPA process is proving frustrating for you and your fellow community members when it is supposed to be a valuable tool for addressing community needs and concerns.

GMVUAC Final Comment: Although it is understood that a high-level planning process is used to support the Travel Forecasting for the 2012 KCCP Update, such a process still must offer some modicum of consistency with detailed forecasts. We see a strong disconnect here that, in many cases, renders County Travel Forecasting moot. As a result, downstream impacts become magnified and render such planning subject to too many variations, many of which are not

understood, nor adequately quantified.

C. Public Transportation System

D. Road System

(p. 7-23) **T-203b:** – **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 primarily serve the needs of urban areas. Rural regional corridors shall be identified in the Transportation Needs Report (Appendix C) based on the following criteria....**

The GMVUAC does not concur that additional capacity be added to the designated “Rural Regional Corridor” Issaquah-Hobart Rd.

(p. 7-24) **T-205a:** -- **King County shall work with cities to eliminate unincorporated road right-of-way islands within or between cities. Roadways and shared streets within or between cities, but still under King County jurisdiction, should be annexed by adjacent cities in order to provide for a consistent level of urban services on the affected roads.**

This is logical and understandable from a KC budgetary standpoint, but KC then loses any Transportation Concurrency evaluation capability when evaluating permits for urban-serving facilities, such as Schools, Stormwater Detention Ponds, etc. sited in the Rural Area.

E. Airports

F. Marine Transportation

G. Level of Service Standards

(p. 7-26) **T-209:** -- **The LOS standard for certain minor residential and minor commercial developments, along with certain public and educational facilities, shall be LOS F. This standard shall be used in concurrency testing.**

This in effect states that KC’s policy will be to permit schools in the Rural Area knowing that gridlock (i.e., LOS of F) could result.

H. Concurrency

(p. 7-27) 1st paragraph: “The Transportation Concurrency Management program requires that adequate transportation facilities must be available to carry the traffic of a proposed development at county LOS standards, or construction for needed improvements are funded in the adopted Six-Year Roads Capital Improvement Program, or else the proposed development cannot be approved.”

Eliminate the 6-yr lag time loophole for transportation infrastructure to catch-up to new development, so that proposed new development is

evaluated against existing infrastructure.

(p. 7-27) 2nd paragraph: “The portions of certain highways of statewide significance that do not have limited access and function like county arterials **may shall** be included in the King County concurrency test.”

(p. 7-28) 1st paragraph: “A development proposal (including both residential and nonresidential proposals) will be considered to meet the transportation concurrency standard if it is located in a travel shed that meets LOS standards as depicted on the concurrency map in effect at the time of development application.”

This seems to imply that if the existing conditions in the Travel Shed are OK, i.e., it meets concurrency, then a “new” development’s impact on LOS is not taken into account. Thus concurrency testing is always lagging behind the “last” development and the “next” development suffers because of it. The development in question (i.e., requesting a permit) should be added to the Travel Shed and, then, a new concurrency test be conducted to gage its impact.

(p. 7-28) **T-216: -- The concurrency map shall divide unincorporated King County into travel sheds and shall show the areas that meet concurrency standards. Any proposed development in ((areas)) travel sheds that ((are shown on the map to)) meet concurrency standards will be deemed concurrent.**

See comments immediately above.

(p. 7-29) **T-219: -- In the Rural Area, the concurrency test may include a provision that allows the purchase of Transferable Development Rights in order to satisfy transportation concurrency requirements.**

This appears to conflict with Chapter 3’s (ref.: pp. 3-34 & 3-35) R-321 -- The Rural and Resource Land Preservation TDR Program shall include, but is not limited to, the following: b. In the Rural Area, 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, or the TDR Bank, in order to satisfy transportation concurrency requirements.... which also mentions the “TDR Bank” including TDRs outside the Travel Shed in question.

Add: T-220: -- Ensure real transportation coordination is achieved by requiring a Transportation Impact Statement (TIS) be prepared at earliest stages of proposed projects by King County Departments to evaluate and report direct and indirect impacts of their proposed projects on all local roads and thoroughfares. Such a TIS could be akin to an Environmental Impact Statement (EIS). A TIS should be developed at the earliest stages of

proposed projects.

I. Impact Mitigation

J. Nonmotorized Program

K. Transportation Demand Management

III. Ensuring Efficient and Effective System Operation and Management

A. Public transportation policies and service guidelines

B. Road services policies and priorities

C. Air Transportation

D. Climate Change, Air Quality, and the Environment

(p. 7-49) T-332 -- Transportation improvements should be designed, built, and operated to minimize air, water and noise pollution, greenhouse gas emissions, and the disruption of natural surface water drainage in compliance with provisions and requirements of applicable federal, state and local environmental regulations. Natural and historic resource protection should also be considered. Particular care should be taken to minimize impacts where the location of such facilities could increase the pressure for development in critical areas or rural or resource lands.

The last two sentences are good, and should be included in other applicable Chapters as well.

IV. Financing services and facilities that meet local and regional goals

(p. 7-52) 1st paragraph:

A Rural Area LOS of B is good, but conflicts with II.B. Travel Forecasts concerns expressed earlier. The problem is not "additional growth in the rural area," but rather "additional growth" in adjacent cities on the Rural/Suburban fringe directly impacting Rural Area roads and intersections.

A. Transit Revenue Sources

B. Road-Related Funding Capabilities

C. Funding priorities consistent with transit and road strategic plans

D. Revenue Shortfall

V. Coordination and Public Outreach

A. Regional Coordination

B. Freight mobility

C. Public Involvement

CHAPTER 8- SERVICES, FACILITIES, & UTILITIES

I. Regional Services

II. Facilities and Services

A. Providing a Spectrum of Services

F-202 King County should seek to create quality communities by defining the needs and proposing strategies for a full range of public facilities and services, including physical infrastructure and health, human and public safety services. King County should ensure that there is an adequate supply of public facilities necessary to support all communities. Green building and sustainable development practices should be a factor in planning and design.

Make this mandatory.

- B. Urban and Rural Services
- C. Identifying Needs for Facilities and Services
- C. Capital Facility Planning

There are two paragraph "C"'s here.

- D. Addressing Service Deficiencies
- F. Financing Strategies
- G. Essential Public Facilities
- H. Water Supply
 - 1. Potable Water Systems

F-227 (~~Water service delivery within the Urban Growth Area shall meet the requirements of King County Code Section 21A.28.040, and be addressed in capital facility and infrastructure portions of water system plans, as provided for in Policy F-209.~~) In both the Urban Growth Area and Rural Areas of King County, all new construction and all new subdivisions shall be served by an existing Group A public water systems except in the circumstance when no Group A public water system can provide service in a timely and reasonable manner per RCW 70.116.060 and RCW 43.20.260 or when no existing system is willing and able to provide safe and reliable potable water with reasonable economy and efficiency per RCW 19.27.097.

GMVUAC strongly disagrees with the use of this policy for the Rural Area (also see questions and comments under F-230)!

F-229 . All new public water systems formed in the UGA shall connect to the Group A water system in whose service area the new system is located when direct service becomes available. (~~All known and projected costs for anticipated connection shall be funded at the permitting stage of any proposed new construction or new subdivisions.~~)

Why not continue this policy? Would it be possible for the public to be stuck with the costs of a developers water project?

F-230 In the Rural Area, King County land use and water service decisions (~~shall be guided generally by the principle of maintaining~~) support the

long-term integrity of Rural Area ecosystems(~~(, consistent with Countywide Planning Policy LU-15)~~). Within the Rural Area, individual private wells, rainwater catchment, Group B water systems, and Group A water systems are all allowed. ~~((; however, water service shall first be obtained when available from an existing Group A system, or, if such service is not available, then from an existing Group B system, before))~~ If an existing Group A water provider cannot provide direct or indirect service to new development per the exceptions in Policy F-227, a new public water system or private well may be established if it is owned or operated by the following, in order of preference:

a. By a satellite management agency approved by the state Department of Health under contract with the Group A system in whose service area the system is located, provided that the existing Group A water system remains responsible for meeting the duty to serve the new system under RCW 43.20.260; and

b. By a satellite management agency or an existing Group B system approved by both the State Department of Health and King County.

If service cannot be obtained by means of the above stated options, then water service may be obtained by creation of a new system, ~~((or))~~ use of private wells or rainwater catchment. ~~((is allowed. Water service delivery within the Rural Area shall meet the requirements of King County Code Section 21A.28.040, and if provided by a water system Policy F-209. Creation of a new public water system or the expansion of an existing Group B system may be allowed to serve new construction or new subdivisions when no Group A public water system can provide service in a timely and reasonable manner pursuant to RCW 70.116.060, or when an existing system is not willing and able to provide safe and reliable potable water with reasonable economy and efficiency pursuant to RCW 19.27.097.))~~ All new public water systems formed in the Rural Area shall connect to the Group A water system in whose service area the new system is located when direct service becomes available.

Why is this policy change needed? How does this affect those utilizing their own water systems? Would they have to hook up to the new water systems?

Based on our Citizens' Public Surveys, the GMVUAC strongly disagrees with the use of this policy for the Rural Area.

F-233a King County shall require any new ~~of~~ or expanding Group B water

system to have a totalizing source meter and make information from the meter available upon request of King County.

Based on our Citizens' Public Surveys, the GMVUAC strongly disagrees with the use of this policy for the Rural Area.

4. Water Use Efficiency, Planning, and Management

~~((F-242 Consistent with Countywide Planning Policies CO-3, CA-6, CA-9, and FW-5, the UTRC should develop a water accounting program in conjunction with affected water utilities that serve in unincorporated King County. The water accounting program should coordinate information on the rate, timing, and location of new development with the projected ability of water utilities to issue certificates of water availability. The UTRC, in conjunction with Department of Development and Environmental Services, should ensure that the certificate of water availability contains the information necessary to meet the requirements of K.C.C. 13.24.120 and 21A.28.040 and the King County Comprehensive Plan.))~~

This policy should not be deleted unless it is replaced with something comparable in scope and results.

5. Resource Management and Protection

I. Public Sewers and On-Site Wastewater Treatment and Disposal Systems

F-249 Public sewer expansions shall not occur in the Rural Area....

The GMVUAC has chosen not to comment on this policy at this time while awaiting the recommendations in March 2012 of the School Siting Task Force on which one of our members sits. However, our concerns about siting urban facilities and their attendant need for urban-like services, such as sewers, in the Rural Area are clear from our comments on R-325a and elsewhere in this document.

J. Solid Waste

F-256 ~~((King County shall divert as much material as possible from disposal to reduce the overall costs of solid waste management to county residents and businesses, conserve resources, protect the environment, and strengthen the county's economy.))~~ King County should achieve Zero Waste of Resources – to eliminate the disposal of materials with economic value – by 2030, through a combination of efforts in the following order of priority: a. waste prevention and reuse, b. product stewardship, recycling, and composting, c. beneficial use.

In F-255 and F-256 use the word “shall” instead of “should” as these policies must be implemented.

K. Surface Water Management

L. Floodplain Management

III. Energy & Telecommunications

A. Energy

1. Consistency with Land Use Plans
2. Energy Efficiency, Conservation and Alternative Energy Sources
3. Electric Utilities
4. Natural Gas
5. Hazardous Liquid and Gas Transmission Pipelines
6. Natural Gas Distribution Systems

APPENDIX -- AREA ZONING STUDIES

Areas Under Review:

West Hill Renton

West Hill Grocery

Samammish Valley

Maple Valley Split Parcels

In 2010, two docket requests were filed by property owners west of Maple Valley whose properties are split by the Urban Growth Area (UGA) boundary. Both property owners requested their entire parcels be fully located within the UGA....About 90% of [one] property is currently within the Rural Area, with the small remainder inside the UGA. [The other property] is approximately 60% Urban with the remainder in the Rural Area. [neither are in MV's PAA]

Executive Staff recommendation: No change in land use or zoning is recommended.

The GMVUAC agrees with the recommendation of no change in present zoning.

Reserve Silica Property

This is a 402-acre former mining site that is adjacent on three sides to the Forest Production District (FPD). Other nearby properties are designated Rural Area and zoned RA-10, one home per ten acres. The proposal under consideration is to designate 322 acres of the subject property Rural with RA-10 zoning and continue the Forest designation and zoning for the remaining 80 acres.

Staff recommendation: Retain the existing Forest zoning on the southern 80 acres of the site.

The GMVUAC has researched this parcel and listened to presentations from the existing owners. We agree with the recommendation that if this property is to be re-designated, now that the mining operations have been used up, it should re-designated to Forest Production. The properties on 3 sides are also Forest related.

Taylor Mountain Forest Production Area

The 2003 Taylor Mountain Forest Stewardship Plan outlines the management goals as follows: Conserve, protect and restore the natural resources inherent in the land and water; Restore the health and diversity of the forest, Demonstrate environmentally-sound forest management and the importance of conservation of the county's forestland; and Provide educational and passive recreational opportunities for the public, while preserving the site's ecological, wildlife and water quality values.

Thank you (DNRP) for your thorough responses to our list of six questions. The GMVUAC supports the site Stewardship Plan including preservation and promoting working forests. Also, we support KC policy of acquiring Forest lands on a "voluntary, willing-seller basis."

Snoqualmie Mining Site

Fall City Sub Area

UGA Technical Corrections

The KCDOT has identified 12 segments of King County road right of way that are not correctly designated on the King County Comprehensive Plan land use map for the purposes of efficient future road maintenance.

T-205 Any segment of a county roadway that forms the boundary between the Urban Growth Area and the Rural Area shall be designed and constructed to urban roadway standards on both sides of such roadway segment.

The GMVUAC has the following questions:

1) Who pays for the development of the roads?

2) How is the 6-year lag time considered?

Hwy 18 & I-90 Interchange

Vashon Town Plan

Pacific Raceways

Executive Staff Recommendation - As a pre-effective condition, the property owner of Pacific Raceway shall dedicate a conservation easement on all of the land within the 300' buffer established by this study that is under Pacific Raceway ownership. This pre-effective condition must be satisfied before any permits are issued on the portions of parcels 1021059002 and 0321059190 that this study recommends to be rezoned from RA-5 to Industrial (I-P) zoning....The site is limited to racetrack uses only; no other industrial uses are allowed which are not permitted by the SIR Special Use Permit. The Rural land use designation will remain; should the racetrack use be terminated, this property should continue to be designated Rural and the zoning shall revert to RA-5.

The Update calls for ~1 ac of additional Rural Area be changed to industrial zoning for the purpose of an additional access point. The GMVUAC remains concerned any re-zone could allow further Industrial development of Pacific Raceways and surrounding parcels. This property is "limited to

racetrack uses only; no other industrial uses are allowed which are not permitted by the SIR Special Use Permit". This zoning is in effect now and we don't want to see that zoning changed or re-interpreted.

Separate from the Update, but occurring in parallel, we remain concerned with the current Ordinance before the KC Council. It appears the intent of which is to circumvent the Rural Area zoning and change the surrounding parcels to Industrial inviting further development in the Rural Area. We strongly oppose that. We do not want a precedent set or "pilot project" established.