

DNS for Proposed Ordinance No. 2021-0163.2

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Subject: **Comments—SEPA Non-Project Action DNS for Proposed Ordinance No. 2021-0163.2**

The undersigned King County Rural Area Unincorporated Area Councils (UACs) / Unincorporated Area Associations (UAAs) / Organizations [*] seek to “*Keep the Rural Area Rural.*” We have reviewed the subject Determination of Non-Significance (DNS) and the proposed Ordinance No. 2021-0163.2, which calls for changing KC Code **Title 21A Zoning** with regards to the location of Search and Rescue (SAR) facilities in the Rural Area (RA) on parcels over 4.5 ac. Herein we offer our comments on the DNS. Separately, we intend to provide Oral/Written Testimony to the King County Council for its August 18 Public Hearing on proposed Ordinance No. 2021-0163.2.

Typically, in response to a DNS, etc., we would review the SEPA Checklist with a fine-tooth comb to ensure everything has been identified, properly evaluated, and reasonable mitigations offered. However, in this case there is no *specific* site evaluated—except for the “*entire rural Area of KC,*” so, the SEPA Checklist speaks in generalities and correctly refers to this as a “*non-project action.*” Consequently, our Comments deal only with the proposed Ordinance itself and not any specific environmental impacts. If the proposed Ordinance is passed in some form and a specific site is identified, we expect an updated SEPA Checklist to be issued, along with a revised Determination. At that time we would provide Comment on the environmental impacts related to that *specific* site.

While we support SAR, that is not the key issue here based on how the proposed Ordinance is written. What is the key issue is that such zoning changes contemplated would open the RA to urban development. To meet SAR needs, that is totally unnecessary. In fact, the SAR facilities contemplated clearly meet the physical descriptions of facilities that should and can be accommodated inside King County’s Urban Growth Area (UGA) or Rural Towns. Thus, a broadly worded Ordinance, as the proposal is, that would apply to any parcel in the RA over 4.5 acres, is unwanted and unnecessary. Further, the proposed Ordinance amounts to a *variance* to locate a SAR facility in the RA.

The need for a fixed-site facility is overstated. In fact, associated training occurs in the *milieu*, such as in the woods, on the river, or on the ski slopes. This practice is well established. Classroom training for programs such as OEC (Outdoor Emergency Care), WFR (Wilderness First Responder), EMT (Emergency Medical Technician) certification, etc. have long been accomplished in established locations such as schools. Further, volunteer SAR personnel, generally, respond from their homes or personal location of the moment. Full-time services (sheriff, ski patrol, aircraft support, etc.) already have bases of operation from which they dispatch. We believe that consolidation of SAR resources is a poor idea and likely would result in slower response times. If there is a specific need to have a “*base of operations*” for SAR in the county, it can be literally anywhere and there is no need to site it *outside* the UGA.

To compound the issue, in the event that a helipad is included as part of such a facility, the site should be located in an area currently impacted by high noise levels, such as major airports or freeway interchanges. Helicopter noise is a health issue for those within many miles of a helipad. Consequently, helipads should not be located in any residential or agricultural zones. Basing of aircraft support is already well established in our region. In response to a public health or rescue situation, many locations work for this purpose.

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If there is a site that might be particularly useful for the location of SAR “*training facilities*,” it should be *specifically* addressed, rather than use a *blanket approach* to allow siting anywhere in RA. The 4-to-1 program may find application by mitigating any such change in the UGA in a manner consistent with the State’s Growth Management Act.

Based on our extensive past experience with proposals for development in the RA, this proposal would clearly open the door for more intrusion of urban development and infrastructure, which would be in direct conflict with myriad policies found in *VISION 2050*, Countywide Planning Policies, and King County Comprehensive Plan.

We oppose the proposed KC Code changes to: **Title 21A.06**, **Title 21A.08.060 A. Government/business services land uses** table, and **Title 21A.08.100 A. Regional land uses** table.

Thank you for your consideration of our perspectives. Should you have any questions, please contact our undersigned *Coordinator*.

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