

February 24, 2023

To: Chris Jensen, KCCP Manager [chris.jensen@kingcounty.gov](mailto:chris.jensen@kingcounty.gov)  
cc: Ivan Miller, KCCP Update SEPA Responsible Official [ivan.miller@kingcounty.gov](mailto:ivan.miller@kingcounty.gov)  
David Daw, KC DLS External Relations Manager [ddaw@kingcounty.gov](mailto:ddaw@kingcounty.gov)  
Re: Comments on 2024 KCCP Major Update's "Draft Executive Conceptual Proposals"

Chris,

As part of our continuing work on the **2024 KCCP Major Update (Update)**, our Joint Team of King County Rural Area UACs / UAAs/ Organizations (\*) has completed a thorough review of the subject "Conceptual Proposals" document released on January 30, 2023.

Herein we provide our detailed Comments [**in bold purple with yellow highlighting**] which we have embedded within "Conceptual Proposals" document. We request they be considered in preparation of both the Update's *Public Review Draft (PRD)* and *Environmental Impact Statement (EIS)*.

Thank you.

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

Coordinated by:

Peter Rimbos  
[primbos@comcast.net](mailto:primbos@comcast.net)  
Coordinator—Joint Rural Area Team  
Coordinator—KCCP Updates, GMVUAC

Approved by:

Steve Hiester  
[gmvac\\_chair@hotmail.com](mailto:gmvac_chair@hotmail.com)  
Chair, GMVUAC

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

Nancy Stafford  
[nancy@go2email.net](mailto:nancy@go2email.net)  
Chair, UBCUAC

Tim O'Brien  
[obrien\\_timothy@hotmail.com](mailto:obrien_timothy@hotmail.com)  
Chair, EPCA

Andy Bennedetti  
[andyb929@gmail.com](mailto:andyb929@gmail.com)  
Chair, GV/LHA

Serena Glover  
[serena@allenglover.com](mailto:serena@allenglover.com)  
Executive Director, FoSV

Jeff Guddat  
[jeffguddat@yahoo.com](mailto:jeffguddat@yahoo.com)  
President, SCAR

Diane Emerson  
[dianeemerson@yahoo.com](mailto:dianeemerson@yahoo.com)  
President, VMCC

Greg Wingard  
[gwingard@earthlink.net](mailto:gwingard@earthlink.net)  
President, GRC

Ken Konigsmark  
[kenkonigsmark@yahoo.com](mailto:kenkonigsmark@yahoo.com)  
Rural Technical Consultant

Mike Birdsall  
[mike\\_birdsall@yahoo.com](mailto:mike_birdsall@yahoo.com)  
Rural Technical Consultant

Terry Lavender  
[tmlavender8@gmail.com](mailto:tmlavender8@gmail.com)  
Rural Technical Consultant



# 2024 Comprehensive Plan Draft Executive Conceptual Proposals

January 30, 2023

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King County is developing a once-a-decade update to its Comprehensive Plan,<sup>1</sup> which guides where people live, work, and play in King County. As required by the Washington State Growth Management Act,<sup>2</sup> the Plan guides County policy for the next 20 years for local services, land use, and development regulations in unincorporated King County and for regional services throughout the county, such as transit, sewers, parks, trails, and open space.

The Plan update process began in 2022 with creation of a Scope of Work<sup>3</sup> and will continue through adoption by the King County Council at the end of 2024 – which is why the project is known as the "2024 Update." The 2024 Update is required to be a comprehensive review of the plan and will focus on proposals related to equity, housing, and climate change.

**The following is a summary of the proposals currently being contemplated by King County for the 2024 Update.<sup>4,5</sup> The County is asking for your feedback on these ideas. Comments can be submitted by email to [CompPlan@kingcounty.gov](mailto:CompPlan@kingcounty.gov) or [online](#) through February 24, 2023.**

Your feedback on these proposals will inform the development and refinement of a full "Public Review Draft" of the 2024 Update, which is anticipated to be issued in June 2023 along with a State Environmental Policy Act (SEPA) Draft Environmental Impact Statement. Additional opportunities for public review and feedback on the 2024 Update will also occur as part of Council review of the proposals throughout 2024.

Additional issues not included in this summary may also be considered as part of the 2024 Update, where appropriate and consistent with required SEPA review.

More information about the Comprehensive Plan and the 2024 Update can be found at [www.kingcounty.gov/CompPlan](http://www.kingcounty.gov/CompPlan).

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<sup>1</sup> King County Comprehensive Plan [\[LINK\]](#)

<sup>2</sup> Revised Code of Washington Chapter 36.70A [\[LINK\]](#)

<sup>3</sup> Motion 16142 [\[LINK\]](#)

<sup>4</sup> The summary is organized according to the framework established in the approved Scope of Work. Because the update's focus areas are broad, complex, and inter-related, the scoping topics contain issues that overlap; the County is coordinating internally and integrating relevant analysis and proposals to prevent siloed work in the focus areas.

<sup>5</sup> Other policies related to these topics currently exist in the Comprehensive Plan. Because this document is focused on new proposals being added in 2024, those existing policies are not identified here.



## Pro-Equity

**A. Scope of Work Topic:** Reduce housing and business displacement and advance equity for those who are Black, Indigenous, People of Color, immigrants, and/or refugees, especially those who also earn less than 80 percent of the area median income.<sup>6</sup>

**Draft Executive Conceptual Proposals** **We support each of these four “conceptual proposals,” but please see our Comment on item 1.g.”**

1. Support **housing stability** and **mitigate and prevent residential displacement** in unincorporated King County through strategies that increase access to affordable housing for historically underrepresented populations who experienced systemic racism or discrimination in accessing housing opportunity. Some examples include:
  - a. incentivize projects that **promote housing stability, prevent displacement, and promote equitable development** as part of King County’s financing of affordable housing;
  - b. support **community-driven development** projects, including prioritization for affordable housing and community development investments;
  - c. support strategies to **address racially disparate impacts** for Black, Indigenous, and People of Color households such as **increasing home ownership** and supporting community-driven development;
  - d. require County participation in regional **tenant protection** efforts, including County support of programs and strategies that prevent eviction and provide rental assistance;
  - e. County partnership with others to preserve and improve the quality of **manufactured housing communities in unincorporated King County**;
  - f. support reuse of nonresidential buildings, such as extended stay hotels, as **permanent supportive housing**; and
  - g. create a **voluntary inclusionary housing incentive program** for unincorporated King County modeled after recently adopted voluntary and mandatory inclusionary housing regulations for Skyway-West Hill and North Highline.<sup>7</sup> The program would offer density bonuses and other regulatory flexibilities (such as increases in building heights and reductions in requirements for parking) in exchange for providing on-site affordable units as part of a market-rate residential or mixed-use development project. The program would apply to residentially and commercially zoned properties in urban unincorporated King County and in the Rural Towns of Snoqualmie Pass and Vashon. A “fee-in-lieu” of construction of affordable units with market-rate units and offsite development options would be incorporated in the program. This program would update and replace the current Residential Density Incentive Program and the Vashon Rural Town Affordable Housing Special District Overlay. **We are withholding support for this proposal until we have further studied the affordable housing issue through the Vashon-Maury Island Community Council (VMCC) Town Plan Committee.**

<sup>6</sup> The annual household income the U.S. Department of Housing and Urban Development calculates for each metropolitan region.

<sup>7</sup> Ordinance 19555 [\[LINK\]](#)

2. Support actions to mitigate and prevent **cultural displacement**, such as community-driven affordable housing, protections of cultural institutions and community gathering spaces, and supporting culturally appropriate childcare.
3. Support actions, such as business innovation districts and community stabilization initiatives, to mitigate and prevent **economic displacement of businesses** and to recognize the role of small businesses in creating opportunity for Black, Indigenous, and People of Color; immigrants and refugees; the LGBTQIA+ community; women; and other historically underrepresented groups.
4. Require the County to work with other jurisdictions, agencies, and partners to encourage a **wide range of housing affordable at all income levels** to equitably meet the needs of a diverse population. This includes those who are Black, Indigenous, People of Color, immigrants, and refugees; those who also earn less than 80 percent of the area median income; and other intersectional populations, such as people with disabilities, seniors, LGBTQIA+ people,<sup>8</sup> and women. Strategies could include community-driven developments and land trusts, affirmative marketing plans, and gathering input from these culturally specific communities in the pre-development phase to ensure the housing is welcoming and appropriate.

**B. Scope of Work Topic:** Integrate a pro-equity and anti-racist policy framework into the Comprehensive Plan that improves outcomes for those who are Black, Indigenous, People of Color, immigrants, and/or refugees, especially those who also earn less than 80 percent of the area median income.

**Draft Executive Conceptual Proposals** **We support each of these thirteen “conceptual proposals.”**

1. Require intentional, targeted actions, such as adopting zoning practices that increase the types and/or density of housing allowed, that repair harms to Black, Indigenous, and other People of Color households from past and current **racially exclusive and discriminatory land use and housing practices** that resulted in racially disparate impacts (including development patterns, disparate homeownership rates, disinvestment in communities, and infrastructure availability).
2. Support **equitable development projects and investments** (such as community-driven development for affordable housing, local businesses, and community facilities) in areas most directly impacted by structural racism and discrimination, at a higher risk of displacement. This will work to improve access to economic and health opportunities for significant populations of communities experiencing disparities in life outcomes.
3. When evaluating and implementing its land use policies, programs, investments, and practices, require the County to proactively address issues of **equity, social, and environmental justice; racially and environmentally disparate health outcomes; and physical, economic, and cultural displacement.**
4. Support **equitable public engagement in County planning processes** in a manner that centers and prioritizes populations historically underrepresented or excluded from planning processes.
5. Require engagement with historically underrepresented populations to advance community-driven development, implementation, and evaluation of **countywide affordable housing goals, policies, and programs.**

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<sup>8</sup> LGBTQIA+ means people that are Lesbian, Gay, Transgender, Bisexual, Queer, Intersex, Asexual, Plus. As an evolving acronym, the plus symbol includes all other identities on the gender and sexuality spectrum not included already.

6. Require climate solutions that result in equitable outcomes that benefit **frontline communities**.<sup>9</sup> Require prioritizing and supporting ongoing partnerships with frontline communities in co-development and implementation of County climate planning, policies, and programs. Require investment in and enabling of culturally and linguistically contextualized climate change engagement and community education with frontline communities. Require work with regional partners to advance climate equity.
7. Support improving access to farmland for **traditionally underserved and/or socially disadvantaged farmers**,<sup>10</sup> and update associated County agricultural planning processes to ensure agriculture remains economically viable for all farming communities.
8. Support transportation services and facilities that **equitably provide mobility services** to communities with the greatest need, especially populations who are Black, Indigenous, and People of Color; immigrants, and/or refugees; and other intersectional populations. Evaluate displacement risks resulting from transportation programs, projects, and services.
9. Support provision of **accessible and culturally appropriate information about and opportunities for engagement on transportation** services, infrastructure, and planning, including for Black, Indigenous, and People of Color; immigrant and refugee populations; and other intersectional populations.
10. Support strategies to improve **equitable economic opportunity**, such as encouraging priority hire programs and stabilizing local business districts to prevent displacement.
11. Improve **tribal coordination** based on recommendations developed with tribal governments and consistent with new state requirements; details are to be determined pending additional engagement with the Tribes.
12. In the 2016 Comprehensive Plan update, the County removed **the term “citizen”** from the plan to reflect that the County serves all residents, regardless of citizenship status. Similar changes to the development regulations in the King County Code were not made at the time. The County will complete this work by removing the term "citizen" from its development regulations and replacing it with more inclusive language.
13. To improve process equity and help support equitable community outcomes, King County created a **Comprehensive Plan Equity Work Group** as part of the 2024 Update. Collaborate with the Work Group on the current conditions analysis and to develop a framework for equity impact analysis of the proposals. Work together to shape the proposed housing strategies in the 2024 Update. Identify opportunities to improve equitable comprehensive planning and engagement for future plan updates.

**C. Scope of Work Topic: Improve health equity outcomes in communities with the greatest and most acute needs.**

**Draft Executive Conceptual Proposals** **We support each of these nine “conceptual proposals.”**

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<sup>9</sup> King County defines frontline communities as those that will be disproportionately impacted by climate change; these are populations that face historic and current inequities, often experience the earliest and most acute impacts of climate change and have limited resources and capacity to adapt. This includes: Black, Indigenous, and People of Color communities; immigrants and refugees; people living with low incomes; communities experiencing disproportionate pollution exposure; women and gender non-conforming individuals; LGBTQIA+ people; people who live or work outside; those with existing health issues (like asthma and heart disease); people with limited English skills; those experiencing pregnancy; and other climate-vulnerable groups.

<sup>10</sup> The U.S. Department of Agriculture (USDA) defines socially disadvantaged farmers and ranchers (SDFRs) as those belonging to groups that have been subject to racial or ethnic prejudice. SDFRs include farmers who are Black or African American, American Indian or Alaska Native, Hispanic or Latino, and Asian or Pacific Islander. For some but not all USDA programs, the SDFR category also includes women.

1. Require the County to improve access to **local parks and green spaces in Opportunity Areas** where disparities exist due to historic and ongoing underinvestment.<sup>11</sup>
2. Support equitable and sustainable healthy food access to make **locally grown, healthy, and culturally relevant foods** available and reflective of King County communities and traditionally underserved and/or socially disadvantaged farmers (as defined by the USDA). Support the development of and collaboration with programs that produce and distribute affordable and healthy foods, provide nutrition incentives, and increased ability to use food assistance benefits.
3. Change "**marijuana**" terminology to "cannabis," to help reduce the historic and racist stigmatization of cannabis use and to align with recent changes in state law.
4. Support actions that limit disproportionate concentrations of **retail sales and advertisement of tobacco and cannabis** in areas with high percentages of youth and/or residents who are Black, Indigenous, and People of Color.
5. Prioritize investments in strategies and programs that **support young people** in reaching their full potential, such as through programming that builds life, academic, and employment skills.
6. Support actions for and investments in **culturally relevant and equitable health and human service delivery**, such as behavioral health services and facilities.
7. Support incorporating **people-centered design**<sup>12</sup> that includes principles of patient-centered, recovery-oriented, and trauma-informed care in County-owned or -funded regional health and human services facilities, behavioral health facilities, emergency shelters, transitional and permanent supportive housing, and affordable housing.
8. Require a feasibility analysis for possible creation of a **regional network of public hygiene, sanitation, and drinking water facilities**. This proposal is in response to a 2024 Update "mini Docket" request.<sup>13</sup> The feasibility analysis would consider issues such as community needs, whether such facilities should be designated as essential public facilities, possible County and non-county roles and/or partnerships, infrastructure needs, and potential costs and funding options. The study would be used to inform future Comprehensive Plan updates.
9. To help reduce health impacts on frontline communities and vulnerable populations from **extreme heat in urban heat islands**, encourage the use of passive cooling approaches and energy efficient cooling technologies in residential developments in the urban unincorporated area.

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<sup>11</sup> Opportunity Areas are locations where residents have a lower average income, poorer health outcomes, and are more than 0.25-miles to a park in urban unincorporated areas, and more than 2 miles from a park in rural unincorporated areas.

<sup>12</sup> People-centered design has the potential to build on the individual's and/or communities' resiliency, mitigate prior trauma, prevent further harm, and promote healing, especially when developed in consultation with those experiencing the space. Such design incorporates elements that support physical, psychological, and emotional safety, such as: access to nature, clear wayfinding, wider hallways, open and well-lit stairways, clear sightlines, noise mitigation, flexible lighting, calming paint colors, exterior fences, reflecting and honoring culture, and warm and welcoming open spaces and communal areas.

<sup>13</sup> The Docket is an opportunity for the public to request changes to the Comprehensive Plan, land use designations and zoning classifications, and development regulations. [LINK](#) The Executive also utilized a "mini-docket" during scoping for the 2024 Update, which was an additional opportunity for the public to submit requests for changes in a more expedited manner than the full Docket process.



## Housing

**A. Scope of Work Topic:** Comprehensive housing policy review and update.

**Draft Executive Conceptual Proposals** **We support each of these four “conceptual proposals.”**

1. Incorporate requirements of House Bill 1220,<sup>14</sup> including policies addressing **housing needs and racially disparate impacts**; details to be determined until guidance and recommendations are available from the Washington State Department of Commerce.
2. Adopt a King County **Housing Needs Assessment**; details are to be determined as analysis continues and more information is provided by the State later in 2023.
3. Align policies with **current housing strategies, practices, and resources** and **regional housing funding guidelines and priorities**. See more details in the Housing subsection B. below and in the Pro-Equity section above.
4. Update **affordable housing income levels** in the Plan and the Code to use consistent terminology and standards when incentivizing and regulating affordable housing and affordability levels. Clarifying housing income bands will increase the transparency of incentives and resource distribution within affordable housing projects in King County.

**B. Scope of Work Topic:** Improve affordable housing supply, especially for those who are Black, Indigenous, People of Color, immigrants, and/or refugees and that earn less than 80 percent of the area median income.

**Draft Executive Conceptual Proposals** **We support each of these nine “conceptual proposals,” but please see our Comments on items 4. and 8.”**

1. Require monitoring of progress towards meeting **countywide housing targets, countywide affordable housing needs, and eliminating disparities in access** to housing and neighborhood choice. Require updates to countywide and King County strategies when they are not resulting in adequate affordable housing to meet the countywide need.
2. Through the Growth Management Planning Council (GMPC),<sup>15</sup> require regional planning, coordination, and accountability that supports **affordable housing efforts across the county**, including actions towards and monitoring of implementation of the Regional Affordable Housing Task Force report.<sup>16</sup>
3. Prioritize working with other jurisdictions, agencies, and partners to support an **equitable distribution of affordable housing and supportive services** countywide as outlined in the County's Equity and Social Justice Strategic Plan; Best Starts for Kids Implementation Plan; Health Through Housing Implementation Plan; Veterans, Seniors and Human Services Levy Implementation Plan; Mental Illness and Drug Dependency Behavioral Health Sales Tax Fund Plan; and other housing and human services-related implementation plans.

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<sup>14</sup> Engrossed Second Substitute House Bill 1220 [\[LINK\]](#)

<sup>15</sup> A countywide policy-making body required by the Growth Management Act, consisting of elected officials from King County, Seattle, Bellevue, other cities and towns in King County, special purpose districts, and the Port of Seattle. [\[LINK\]](#) The GMPC oversees the King County Countywide Planning Policies. [\[LINK\]](#)

<sup>16</sup> Regional Affordable Housing Task Force Final Report and Recommendations as adopted by [Motion 15372](#)

4. In County-funded affordable housing subsidy programs, prioritize **affordable housing projects** that serve individuals and households at or below 50 percent of area median income for rental projects, at or below 80 percent of area median income for homeownership projects, and/or in areas where there is a severe shortage of affordable housing. **We support programs that prioritize Affordable Housing. We emphasize that truly “affordable” housing that which is not located in the Rural Area—far from job centers, far from transit, and far from needed amenities (e.g., shopping, etc.).**
5. Encourage regional land use and investment strategies that support **mixed-use and mixed-income urban developments** as a way to help racially and economically integrate neighborhoods, increase housing and transportation choices throughout King County, and improve housing stability for people of all incomes. This includes land use strategies such middle housing and inclusionary housing, transit-oriented development, and affordable housing that serves a range of incomes below 80 percent of area median income.
6. Support development of **climate-resilient affordable housing** throughout the County's regional and local housing strategies and actions, such as prioritizing awarding subsidies to climate-resilient affordable housing projects and advocating for incentives that support climate-resilient practices in the statewide green building standards for affordable housing.
7. To reduce displacement risks and support development of more affordable housing, create an **unincorporated-wide voluntary inclusionary housing incentive program**. See more details in the Pro-Equity section above.
8. Repeal the **Vashon Rural Town Affordable Housing Special District Overlay**, and rely instead on the new inclusionary housing program discussed in the Pro-Equity section above. The Overlay was not successful in producing any affordable units, and the new inclusionary housing program is anticipated to more effectively support the improved affordable housing access intended by the Overlay. **Please see our earlier comments under section Pro Equity, A.1.g.**
9. Require the County to work with other jurisdictions, agencies, and partners to encourage a **wide range of housing affordable at all income levels that equitably meets the needs of a diverse population**. See more details in the Pro-Equity section above.

### C. Scope of Work Topic: Expand housing options.

**Draft Executive Conceptual Proposals** **We support each of these three “conceptual proposals;” however, we assume item 3., on expanding “allowed SEPA exemptions,” only applies to Urban areas. Further, this needs clarification on phrases such as: “a certain size.” We believe the SEPA process is vitally important to the protection of Rural Areas from uncontrolled development, as required by the GMA. We do not want to see SEPA weakened and large swaths of the Rural Area exempted from the protections it affords to all residents and our shared environment.**

1. Incentivize development of new affordable housing that includes sufficient two-, three-, and four-bedroom dwelling units to meet space needs of anticipated households and **promote culturally relevant housing options**.
2. Expand housing options by increasing the types of housing allowed in low-density urban residential zones to support development of **middle housing**, which is typically more affordable than traditional single-detached homes. Allow outright duplex, triplex, and fourplex multifamily developments in all residential zones in unincorporated King County. Limit building heights to 35 feet in lower-density zones, to support compatible development with existing neighborhoods. Adjust minimum and maximum lot widths to keep scale of buildings small to support multiple units and improved affordability. Reducing landscaping and on-site recreation requirements, and reduce parking requirements, to incentivize development of the middle housing types and improve affordability. Allow outright apartments (five units or more) in lower-density zones if the site allows.



3. Expand **allowed SEPA exemptions** to match those allowed in state law. This change would exempt the following types of development from SEPA review if the project is below a certain size: single-detached residential, multifamily residential, barn, loafing shed, farm equipment storage, produce storage, packing structure, office, school, commercial, recreational, service, storage building, parking facilities, and fill or excavation. Expanding the exemptions will help reduce time and costs of permitting such developments, which can help support the region's wide range of housing needs and goals.



## Climate Change & the Environment

**A. Scope of Work Topic:** Alignment with and advancement of King County's 2020 Strategic Climate Action Plan<sup>17</sup> to reduce greenhouse gas emissions, support sustainable and resilient communities, and prepare for climate change.

**Draft Executive Conceptual Proposals** **We support each of these eleven "conceptual proposals."**

1. Create a new Comprehensive Plan **climate change Guiding Principle** and associated policy direction that requires the County to reduce greenhouse gas emissions, advance climate equity, and prepare for climate change impacts consistent with the Strategic Climate Action Plan.
2. Require climate solutions that result in equitable outcomes that benefit **frontline communities**; see more details in the Pro-Equity section above.
3. Update **greenhouse gas emissions reductions targets** to match those in the Countywide Planning Polices and the King County Strategic Climate Action Plan. Require King County to regularly assess and report on countywide greenhouse gas emissions.
4. Require development regulations and programs that reduce energy use, increase the use of renewable energy, and **phase out fossil fuel use** in the built environment. Require programs to prioritize access and affordability for frontline communities. Encourage energy utilities to provide fossil fuel reduction strategies. Set fossil fuel use reduction goals for County operations and require fossil fuel elimination action plans that, for example, identify strategies to replace fossil fuel usage with renewable electricity sources.
5. Support actions, such as increasing methane capture and use at King County owned landfills and wastewater treatment facilities, that remove barriers for and maximize use of **renewable natural gas** to decrease reliance on greenhouse gas-emitting carbon fuels.
6. Integrate consideration of equity and social justice impacts in the siting of **renewable energy technologies**.
7. Promote investment in **equitable transit-oriented development** to help reduce emissions from the transportation sector. This includes prioritizing the inclusion of housing affordable to households earning less than 80 percent of the area median income in transit-oriented development on King County Metro property; considering land use, inclusionary housing, anti-displacement measures, and community characteristics when planning bus rapid transit investments; and partnering with regional affordable housing funders to align resources, when possible, to advance regional housing development goals.
8. Support expansion of private **electric vehicle** use, including opportunities to improve equitable access to electric vehicle information, incentives, and charging infrastructure. This could include providing information in multiple languages about access to and the economic benefits of electric vehicle ownership,

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<sup>17</sup> King County 2020 Strategic Climate Action Plan [\[LINK\]](#)

supporting electric carsharing programs in underserved communities, and supporting increased federal or state rebates for households with low incomes for the purchase or leasing of electric vehicles.

9. Require the County to take steps to plan for and reduce **wildfire impacts** in wildland-urban interface in unincorporated King County. Encourage cities in the wildland-urban interface to conduct wildfire risk assessment and planning. Support actions to improve forest health and wildfire resilience on forest lands. Amend clearing and grading regulations to allow for vegetation management to reduce wildfire risk near residential buildings. Collaborate with regional partners to reduce landslide and flooding risks resulting from wildfire damage and associated impacts. Support actions that reduce health impacts of wildfire smoke. Support actions for community wildfire education and preparedness.
10. Support actions and programs that provide frontline communities skill development for and access to **living-wage green jobs**, such as increasing County employment on-ramps that lead to green jobs and careers.
11. Support actions and programs that increase waste prevention, reuse, recycling, and composting to improve resource conservation and lead toward the goal of achieving cost-effective **zero waste of resources**, such as supporting innovative technologies that can recover more useful materials and adopting regulations that make waste prevention and recycling easier to do.

## B. Scope of Work Topic: Integrate and implement Clean Water, Healthy Habitat goals.

### Draft Executive Conceptual Proposals **We support each of these six “conceptual proposals.”**

1. Strengthen requirements for shoreline development to be located and designed to avoid the need for future **shoreline stabilization** over the life of the structure, consistent with recent state-level legislative changes and current practices. Allow new or replacement structural shoreline stabilization only when a geotechnical report confirms a time-sensitive need for the stabilization. In such cases, require the use of nonstructural shoreline stabilization measures first, then soft structural shoreline stabilization if nonstructural solutions are not feasible; new or replacement hard structural stabilization (including bulkheads) would only be allowed in limited circumstances. Create more clarity on the thresholds for stabilization repair and replacement. Encourage shoreline development to be set back enough from steep slope and erosion hazards to protect them over the life of the development, not just at the time of construction.
2. To further **protect environmental quality and important ecological functions**, require implementation of the County’s fish passage restoration program, Land Conservation Initiative,<sup>18</sup> and Clean Water and Healthy Habitat strategic plan.<sup>19</sup>
3. Support restoration and enhancement of flood storage, flood conveyance, and ecological functions through **floodplain management actions that provide multiple benefits**, rather than a singular outcome. Other benefits flood risk reduction projects may include are resiliency to climate change, consistency with King County’s equity and social justice goals, improvements to habitat, expanded recreation access, or improvements to viability of farming or forestry land uses in the vicinity.
4. Review and update of the County's **critical areas regulations**, using best available science, such as: reviewing riparian, aquatic, and/or alluvial fan regulations; stream, wetland, and/or Critical Aquifer Recharge Area (CARA) mapping; climate change considerations; and species and habitats of local importance.
5. Amend Critical Areas code and Clearing and Grading code to allow for **management of beaver dams**. This would allow for actions to reduce or mitigate the impacts or hazards of beaver dams, including but not limited to removal of a beaver dam or portion of a beaver dam; the installation, maintenance, adjustments,

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<sup>18</sup> King County Land Conservation Initiative [\[LINK\]](#)

<sup>19</sup> King County Clean Water Healthy Habitat [\[LINK\]](#)

replacement, and removal of beaver dam devices; and removal of sticks and other debris accumulated against beaver dam devices.

6. Support actions for regional collaboration on **stormwater management** planning, regulations, and funding to prioritize regional stormwater system improvements where cost-effectiveness and the benefits to communities and ecosystems are the greatest, regardless of jurisdictional boundaries.

### C. Scope of Work Topic: Increase land conservation.

**Draft Executive Conceptual Proposals** We support each of these three “conceptual proposals,” but please see our Comments on items 1. and 2.”

1. The GMPC is currently considering possible changes to the **Four-to-One program**. Some of the changes being evaluated include whether to allow: reduced open space dedication for lands with high ecological value, facilities to be located in the rural area, nonresidential developments, multifamily developments, and projects along the Urban Growth Area boundary as set by previous joint planning agreements rather than the original 1994 boundary. If changes are recommended by the GMPC, the Comprehensive Plan and King County Code would also need to be amended accordingly. Those changes will be determined when the GMPC completes its review; a draft of the GMPC recommendations are anticipated to be published in March for possible action in May, which would then be included in the Public Review Draft of the 2024 Update. **We continue to attend GMPC bi-monthly meetings and offer testimony, as needed.**
2. Update **Transfer of Development Rights (TDR)** program regulations. **We support a review and update of the TDR program. It is a complex program that has not always lived up to its promise. However, in the last ten years or so, the program has provided significant monies for conservation.** Allow urban open space acquired using conservation futures tax funding to become TDR sending sites. **We support this as it clarifies study requirement codes for TDR removal from urban open space in unincorporated KC acquired with conservation futures tax (CFT) and transfer of the TDRs into the urban unincorporated area.** Clarify study requirements for impacts of using TDRs to increase base densities in formal subdivisions. **We spoke with Michael Murphy, past TDR Manager, and learned the following: This already exists in the 2020 Comp Plan update. It is clarifying the study requirement in formal plats regarding using TDRs to increase base density. KC Code is vague about the study requirements, so this is a remedy to clarify the code. These occur entirely within the Unincorporated Urban Area and will be used in Skyway and White Center for example. The Open Space is acquired within the Unincorporated Urban Area (long underserved) and must be purchased with CFT. There are several projects in the works. The development rights on the land purchased can then be transferred into the Unincorporated Urban Area. This, in some ways, ensures the community gets an amenity for density and preserves the potential for housing. No urban density is lost when Open Space is added. It can only work in the Unincorporated Urban Area, unless the County negotiates agreements with Cities, which is very complex.** Incentivize preservation of vacant marine shoreline parcels without hard structural stabilizations by providing bonus sending site TDRs. **We support this as it provides an incentive for owners of Natural Marine Shorelines to donate protective conservation easements and receive double TDRs that can be sold and the landowner keeps the revenue. Preservation can mean an Easement leaving the shoreline forever natural or enrolling in the Dept of Ecology Conservancy or Natural status program. If KC purchases the conservation easement, the County gets the TDRs. If the landowner donates the easement or protection, the landowner gets the TDR plus a bonus TDR. They can sell the TDRs and keep the revenue.** Remove exemption for calculating greenhouse gas emission impacts of increased densities resulting from urban TDR receiving sites. **We support this, but hope calculations such as these will become more accurate and reliable in the future, as that is not the current reality. That said, we find this confusing because “remove exemption” is not really what is proposed. The intent is to remove the suggestion that TDRs create a carbon reduction. Sometimes they do, but sometimes it is not clear. There needs to be reliable carbon sequestration credit systems and TDR is complex and it is not easy to capture the information with current tools. Thus, the words above to remove the requirement to calculate it.**

We also recommend the following existing KCCP Policies be reviewed and, possibly, strengthened (as shown through editing marks):

- “R-309 The RA-2.5 zone, which has an underlying base zoning of 5 ac, 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. ... A subdivision at a density of one home per 2.5 acres shall only be permitted through the TDRs from property in the designated Rural Forest Focus Areas. The site receiving the density must be approved as a TDRs receiving site in accordance with the King County Code. ....”
- “R-313 The purpose of the TDRs Program is to reduce development potential in the Rural Area and designated Natural Resource Lands, and its priority is to encourage the transfer of development rights from private rural properties into the Urban Growth Area and promote the preservation of housing potential.”
- “R-319 TDRs may be used on receiving sites in the following order of preference as follows: ....” [Although we do not have any proposed changes to this policy at this time, we will continue to review it.]

3. Support strategies for and investment in development and retention of future **old growth corridors**, including landowner incentives and land conservation tools such as TDRs, conservation easements, and acquisition.



## General Updates

**A. Scope of Work Topic:** Implement unincorporated area-related changes from the Countywide Planning Policies.

**Draft Executive Conceptual Proposals** We support each of these four “conceptual proposals,” but please see our Comments on items 3. and 4.”

1. Adopt new **housing and jobs growth targets** for unincorporated King County, as established in the Countywide Planning Policies.
2. Designate the **Skyway and White Center Unincorporated Activity Centers** as countywide centers, allowing them to be prioritized for additional infrastructure investments. The Puget Sound Regional Council's (PSRC) VISION 2050<sup>20</sup> states that funds managed by the PSRC will be directed toward designated regional and countywide centers. The Countywide Planning Policies identified Skyway and White Center Unincorporated Activity Centers as candidate centers. This would formalize that action.
3. In 2022, the Washington State Legislature passed SB 5593,<sup>21</sup> which allows, but does not require, counties to utilize **Urban Growth Area exchanges** when specific conditions are met. This would allow lands currently in the Urban Growth Area to be removed in exchange for rural lands added to the Urban Growth Area in areas pressured by patterns of development that exceed available, developable urban lands. The Countywide Planning Policies would need to be amended in order use this allowance in King County. The GMPC is currently evaluating whether to recommend allowing such exchanges. If recommended, the

<sup>20</sup> A multicounty policy making body for King, Pierce, Snohomish and Kitsap counties; [\[LINK\]](#). The PSRC oversees the multicounty planning policies in VISION 2050. [\[LINK\]](#)

<sup>21</sup> Engross Substitute Senate Bill 5593 [\[LINK\]](#)

Comprehensive Plan and King County Code would also need to be amended accordingly. Those changes will be determined when the GMPC completes its review; a draft of the GMPC recommendations are anticipated to be published in March for possible action in May, which would then be included in the Public Review Draft of the 2024 Update. **We continue to attend GMPC bi-monthly meetings and offer testimony, as needed, as we follow progress on this item, as well as several others.**

4. Support coordination with **cities adjacent to the Rural Area and Natural Resource Lands** to ensure that the development review process for large mixed-use developments in a city mitigates impacts on unincorporated areas, such as to prevent increased traffic, maintain rural character, and protect environmentally sensitive areas. **We applaud this, but the State's Growth Management Act (GMA) already calls for such "coordination," but it has no "teeth." Consequently, we fear this effort will not further provisions for such needed mitigation. Also, why only "mixed-use developments," as there already is massive developments in such adjacent cities that are not mixed-use?**

## B. Scope of Work Topic: Implement Subarea Planning Program.

**Draft Executive Conceptual Proposals** **We support each of these four "conceptual proposals," but please see our Comment on item 4."**

1. As part of the 2024 Update, the County is developing and will adopt a **Snoqualmie Valley/Northeast King County Community Service Area Subarea Plan**, as well as implementing land use and zoning changes and development regulations. This subarea plan will apply to the entire Community Service Area and will replace the current Fall City Subarea Plan. More information about those proposals and how to provide feedback on them can be found at <https://publicinput.com/SnoValleyNEKC>.
2. As required by the Vashon-Maury Island Community Service Area Subarea Plan, update **property-specific zoning conditions Vashon-Maury Island**.<sup>22</sup> More information about those proposals and how to provide feedback on them can be found at <https://publicinput.com/vashonsubarea>.
3. The King County Department of Local Services is working with community members to co-create an improved process to develop **Community Needs Lists**.<sup>23</sup> This work is ongoing, and potential changes are to be determined.
4. Update the **subarea planning schedule** to reflect a recent change in state law that puts comprehensive planning on a 10-year update cycle. The updates will ensure there is a break in subarea planning to support development of those 10-year updates. **Currently, there is a problem with the Subarea Plan schedule, where the 2024 KCCP Major Update and the GMV/CR CSA Subarea Plan overlap for 1 1/2 years, as shown in the current schedule in red:**
  - Snoqualmie Valley/NE King CSA** – planning 2021-2023, adoption December 2023
  - Eight Year Comp Plan Upd** – planning 2022-2023, adoption June 2024 [changed to December 2024]
  - Greater Maple Valley/Cedar River CSA** – planning 2023-2024, adoption June 2025
  - Fairwood Potential Annexation Area** – planning 2024-2025, adoption June 2026
  - Bear Creek/Sammamish CSA** – planning 2025-2026, adoption June 2027
  - Southeast King County CSA** – planning 2026-2027, adoption June 2028
  - Four Creeks/Tiger Mountain CSA** – planning 2027-2028, adoption June 2029
  - East Renton Potential Annexation Area** – planning 2028-2029, adoption June 2030
  - Federal Way Potential Annexation Area** – planning 2029-2030, adoption June 2031**Part of this problem was caused by sliding final approval, of the "Eight Year Comp Plan Update" to December 2024 to coincide with changes made by the State Legislature, without sliding any of the subsequent CSA Subarea Plan dates. One way to rectify this is to slide all remaining Subarea Plan**

<sup>22</sup> Vashon-Maury Island Community Service Area Subarea Plan, VMI CSA Workplan Action 1 [\[LINK\]](#)

<sup>23</sup> Community Needs Lists help implement subarea plans and identify specific actions such as programs, services, or capital improvements that respond to community-identified needs. [\[LINK\]](#)

start dates the same 6 months to the right. For example, this would slide the start of the Greater Maple Valley/Cedar River CSA to December 2023. We request this be strongly considered.

**C. Scope of Work Topic:** Update transportation policies. Modifications to transit-related policies contemplated in the 2024 KCCP update are those to reflect already-adopted updates to County transit policies, including as part of Ordinance 19367.<sup>24</sup>

**Draft Executive Conceptual Proposals** We support these three “conceptual proposals,” but provide some recommendations below.

1. Support transportation services and facilities that **equitably provide mobility services** to communities with the greatest need as noted in the Pro-Equity section above.
2. Support investments that improve **safe, equitable, and accessible opportunities for public transportation services**, pedestrians, bicyclists, car and van pools, and other alternatives to single occupant vehicles – especially where the needs are greatest – such as providing fixed or flexible transit services, safe and accessible bus stops, sidewalks, road shoulders, and bike lanes.
3. Support the state **traffic safety goal of zero deaths** and serious injuries by collaborating with other agencies, emergency service providers, and road users to prioritize the elimination of these type of crashes. Support health and safety by incorporating **complete streets** infrastructure in the County roadway standards.

...We recommend adding to the above the following item from the original 2022 Scoping:

4. “Review policies, regulations, and programs related to transportation improvements and access in the Rural Area, including mitigation of impacts of urban development on the rural area transportation network.”

...We also recommend the KCCP include discussion of this an “equity” issue (an issue of fairness similar in form and effect to the formal definition of equity), as there are clear inequitable impacts caused by urban area (i.e., city) commuters on rural residents and County transportation infrastructure (i.e., roads) primarily paid for and maintained by taxes on rural residents, not on all users. This is an issue KC DLS-Roads has grappled with for decades with many solutions offered, but none ever implemented. Ultimately, State legislation will be needed to secure a permanent fix to the gas tax and its distribution and/or through a dedicated revenue source for counties to maintain their transportation infrastructure.

**D. Scope of Work Topic:** Review rural and natural resources regulations.

**Draft Executive Conceptual Proposals**

1. Update **Farm, Fish, Flood** policies to ensure that, when implementing flood risk reduction and habitat projects, there remains sufficient land within Agricultural Production Districts available to support long term viability of commercial agriculture. While implementing the Growth Management Act mandates to preserve Agricultural Production Districts for commercial agriculture uses, these updates recognize that 1) the ability to advance salmon recovery in these areas is important to honoring and sustaining the rights held by the State of Washington and Indian tribes as sovereign trustees for fish, wildlife, and other aquatic resources, and 2) restoring floodplain processes and mitigating flood risks are necessary to ensure human health and protect public safety. The County will continue to support the Snoqualmie Valley Farm, Fish, Flood work, but will not create similar processes in other Agricultural Production Districts. Instead, the County will more quickly and efficiently implement the Farm, Fish, Flood goals in all Agricultural Production Districts based on the lessons learned from the Snoqualmie Valley work. In that vein, the 2024 update commits the County to utilize a review process that considers a watershed context for projects sponsored by the King County Department of Natural Resources and Parks, Water and Land Resources Division, in Agricultural

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<sup>24</sup> Ordinance 19367 [\[LINK\]](#)

Production Districts where a habitat or floodplain restoration project may result in reducing the amount of land available for farming; the process will identify ways to balance the goals of agricultural production, habitat quality, and floodplain and ecological functions in individual projects. **We support such processes that consider the watershed as a whole and give strong consideration to ecological functions as defined by the US EPA: “nutrient cycling, carbon storage, erosion/sedimentation control, increased biodiversity, soil formation, wildlife movement corridors, water storage, water filtration, flood control, food, timber and recreation, as well as reduced vulnerability to invasive species, the effects of climate change and other natural disasters.”**

2. Modify regulations to clarify **where resorts are allowed in the Rural Area**, consistent with County policies that support protection of Rural Area and Natural Resource Lands, and in acknowledgment of the infrastructure limitations in such areas. **...Resorts do not belong in Rural Area (RA). Event Centers are not defined in KC Code and, therefore, not allowed in the RA. Several entities just want Event Centers, and thought they would get them through the Winery/Brewery/Distillery (WBD) legislation. We fear they again will try to get them another way. Consequently, we seek a KC Code change such that Event Centers, as “stand-alone” operations, are not allowed in the RA and on Ag-zoned parcels. KC Code needs a definition for Special Events.**
3. In response to a 2022 Docket request,<sup>25</sup> limit impacts of **materials processing** uses, such as clarifying that retail sales of the materials on the site are only allowed with a conditional use permit; as an accessory to a mineral use, only allow processing of onsite and/or nearby (within three miles of the site) materials; and additional requirements for sites in the rural area, including storage limitations (up to 3,000 cubic yards), ensuring code compliance requirements (landscaping, nonresidential land use standards, and grading permits), and requiring that materials be primarily from rural and resource lands to ensure it is a rural-dependent use. **...The referenced Docket Request #8—Materials Processing in the Rural Area was submitted by the Joint Team. It cited specific State RCWs, PSRC VISION 2050 MPPs, King County CPPs, and KCCP Policies—all related to materials processing and rural character. Consequently, we have the following concerns with this “Conceptual Proposal”:**
  - a. **Limitations are needed on the number of mineral extraction sites in a Subarea.**
  - b. **Mitigation of collective impacts on roads, safety, environment need to be systematically addressed per King County goals to reduce Greenhouse-Gas Emissions 80% by 2050.**
  - c. **Operations at mineral extraction sites should not include material processing/debris storage/disposal operations (no stumps, or “inert material” allowed from offsite), as allowing same creates additional impacts and makes mitigation within a Subarea much more difficult to identify and monitor.**
  - d. **We recommend appropriate changes in KCCP Policies: R-616, R-681, R-686, R-690, etc. and KC Code: 21A.22.—050, 060, 081, etc., as necessary.**
  - e. **Three thousand cu yd piled up in one spot in a 20-ft high mound can and have caused fires. Buckley Recycling Center (BRC), as an example has had serious fires in its material piles at both their Buckley and Auburn area locations**
  - f. **This clearly leads to a “Camel’s nose in the tent problem.” Once you have the nose, you have a whole camel whether you allow it or not. Once established as a legal use, they are then free to push the boundaries of the limits, as the underlying use is allowed, and someone has to prove they are violating the fine print. It also helps them establish a transition post mining to a zoning flip, as there is already an established business that can continue on beyond the active mining activity.**
  - g. **King County cannot handle enforcement of the existing activities related to sand and gravel operations. Adding a difficult to determine set of conditions for a new use, such as retail organics and soil preparation, will make that just that much harder, especially as the County already is struggling with a less difficult set of criteria, or check list.**
  - h. **This appears to be part of an aggregate/developer plan to push for flipping the zoning of mines from reverting back to forestry-based zoning, as is required, to a higher intensity zoning that allows for greater short-term profits than a tree harvest rotation cycle. This**

<sup>25</sup> 2022 Docket Report – Request #8 [\[LINK\]](#)

threatens additional substantial losses of the County's rural resources land base, adversely affecting both the County and its residents over time.

4. In response to a 2022 Docket request<sup>26</sup> and to help reduce impacts of **mining operations**, create phasing requirements that limit the size of each phase, such as: on sites 100 acres or less, each phase would be limited 25 acres; and on sites more than 100 acres, each phase would be limited to 50 acres, and any areas of greater than 25 acres would be required to have setbacks twice as large as would be otherwise required. Regardless of size of the site, a third phase would not be able begin until reclamation on the first phase is substantially complete. Uses, buildings, and storage of equipment or materials not directly related to an approved mining use, reclamation plan, or accessory use would be expressly prohibited. ...**The referenced Docket Request #9—Periodic Review & Reclamation Process was submitted by the Joint Team. In it we called for the existing “Periodic review” process (KC Code Title 21A.22.050 [Mineral Extraction] Periodic Review) to include reclamation. Docket Request #9 provided 8 pp of detailed supporting rationale, which included references to:**

- **State RCW 78.44.081—Reclamation permits required—Applications**
- **VISION 2050 Multi-County Planning Policies (MPPs): DP-32, DP-37, & DP-41**
- **Countywide Planning Policies (CPPs): EN-1**
- **King County Comprehensive Plan: Chapter 3. RURAL AREAS AND NATURAL RESOURCE LANDS, Part 1. Rural Area**

**While this “Conceptual Proposal” is on the right track, we will have to see how the details are addressed, in light of our Docket Request, in the upcoming Public Review Draft.**

5. Disallow **mixed use developments on Neighborhood Business (NB) and Office (O) zoned properties in the Rural Area**, except in Rural Towns. These zoning classifications are applied to parcels in both urban and rural areas. A range of uses are allowed within those zones, with a focus on commercial uses. However, multifamily housing (apartments, townhouses, and group residences) is also allowed if part of a mixed-use development. The allowed residential densities of these developments currently range from eight to 96 dwelling units per acre, regardless of whether the property is in the urban or rural area. As directed by the Growth Management Act and the Comprehensive Plan, those are urban levels of development that are not appropriate for the Rural Area, where the general growth pattern and established density limits range from one home per 2.5 to 10 acres (depending on the applicable rural zoning classification). ...**This is a request we made in 2018 and we are glad it is being addressed. Subsequently, KC DLS-Permitting review applicable KC Code and drafted the following proposed changes, which we fully support:**

**21A.04.090 Neighborhood business zone. — “...2. Allowing for mixed use (housing and retail/service) developments in the urban area and in Rural Towns. ((and for)) Townhouse developments are permitted as a sole use on properties in the urban area with the land use designation of commercial outside of center; and....”**

**21A.04.100 Community business zone. — “...2. Allowing for mixed use (housing and retail/service) developments in urban areas and in Rural Towns; and....”**

**21A.04.110 Regional business zone. — “...4. Allowing for mixed use (housing and retail/service) developments in urban areas and in Rural Towns....”**

6. Disallow new **Urban Planned Developments (UPDs)** in unincorporated King County. There are no current UPDs; previously established UPDs have either been annexed into cities or been redesignated to conform to standard King County zoning and development regulations. Additionally, there are no remaining large, undeveloped unincorporated urban areas that would be suitable for future UPDs. ....**We fully support this, but also recommend the end of so-called “Demonstration Projects” in the Rural Area, such as the Regional Motor Sports Facility; Remote Tasting Rooms; Reserve Silica’s continual request; etc. KC Code Title 21A.55—DEMONSTRATION PROJECTS states under: 21A55.010 Purpose — “All demonstration projects shall have broad public benefit....” Further, Demonstration Projects do not meet multiple and comparable Policies such as:**

<sup>26</sup> 2022 Docket Report – Request #9 [\[LINK\]](#)



- **VISION 2050:** "MPP-DP-37 Ensure that development occurring in rural areas is rural in character and is focused into communities and activity areas"
- **King County Countywide Planning Policies:** "DP-47 Limit growth in the Rural Area to prevent sprawl and the overburdening of rural services, minimize the need for new rural infrastructure, maintain rural character, and protect open spaces and the natural environment;"
- **King County Comprehensive Plan:** "R-301 A low growth rate is desirable for the Rural Area, including Rural Towns and Rural Neighborhood Commercial Centers, to comply with the State Growth Management Act, continue preventing sprawl and the overburdening of rural services, reduce the need for capital expenditures for rural roads, maintain rural character,..."

**E. Scope of Work Topic:** Advance public Docket amendment requests, where appropriate.<sup>27</sup>

**Draft Executive Conceptual Proposals** **We have no comments on these two "conceptual proposals."**

1. **Vashon Grange:** Parcel 8887000660 and the surrounding area. A 2022 Docket request<sup>28</sup> proposed possible land use designation and zoning classification changes to allow a retail food store in a historic Grange Hall near the north ferry terminal. Such a change would require creation of a new Rural Neighborhood Commercial Center (RNCC), which is not allowed by the Comprehensive Plan. Changing the Plan to allow new RNCCs would have broader impacts throughout the Rural Area, which is not consistent with Growth Management Act and Comprehensive Plan directives for the Rural Area. While there is an existing RNCC in the vicinity, expanding it to include this parcel would also need to include several intervening rural residential parcels, which would encourage commercial development at a scale that is not appropriate for this area and establish a poor precedent for other RNCCs. Instead, to support the concept of allowing for creative reuse and associated preservation of otherwise unused Grange Halls in a manner that serves the local community, a zoning code change is recommended that would allow food stores in the RA (Rural Area) zone outside of a RNCC, if the store is within a historically designated Grange Hall and the property is located near an existing RNCC.
2. **Kent Pet Cemetery:** Parcel 1522049162 and the surrounding area. A 2024 Update "mini Docket" request proposed evaluating land use designations and zoning classifications related to a historic pet cemetery in the vicinity. This analysis is ongoing, and recommendations are to be determined.

**F. Scope of Work Topic:** Land Use and Zoning Studies.

**Draft Executive Conceptual Proposals**

1. **Maple Valley Industrial:** Parcels 1622069091, 1522069034, and 1522069036 and the surrounding area. The Scope of Work directed review of the land use and zoning of the properties. The parcels are currently in the Urban Growth Area and zoned Industrial with a property-specific development condition that limits the uses on the site to those that do not require a conditional use permit. This issue was evaluated in the 2016 Comprehensive Plan.<sup>29</sup> However, no changes were recommended because additional analysis was needed. Further analysis completed as part of the 2024 Update has concluded that the site conditions and location of the properties make them not appropriate for urban or industrial development. Therefore, it is recommended that the parcels be removed from the Urban Growth Area and rezoned s [is this "s" a typo?] RA-5 (Rural Area, one home per five acres), with no development conditions. **We agree with this decision and it is supported by our detailed Scoping Comments provided to the KC Council in June 2022, which we summarize below:**  
**"The City of Maple Valley Comprehensive Plan Zoning Maps show that none of these parcels are within the city limits. The KCCP Land-Use Map also does not show any of these parcels within**

<sup>27</sup> Note that some Docket requests are listed in other sections of this summary when the request directly relates to an approved scoping topic.

<sup>28</sup> 2022 Docket Report - Request #8 [\[LINK\]](#)

<sup>29</sup> Executive Recommended 2016 King County Comprehensive Plan – Area Zoning Study #15 [\[LINK\]](#)

**the UGA or as PAAs of the City....Our starting concerns are why are these parcels zoned Industrial ("I") and what is the specific meaning here for the "P" suffix? All three parcels are <1,500 ft from the Cedar River, with one parcel is <1,000 ft away."**

2. **Snoqualmie Interchange:** The Scope of Work directed review of parcels north of the I-90 and State Route 18 interchange for possible addition to the Urban Growth Area. The parcels do not meet the current criteria in the Countywide Planning Policy DP-17 for addition to the Urban Growth Area: 1) a countywide analysis and determination that the size of the Urban Growth Area is sufficient to accommodate growth targets, 2) the property is not adjacent to the original 1994 Urban Growth Area boundary, and 3) the property is not a King County park being transferred to a city for park use in perpetuity or a park owned by a city since 1994. Additionally, this analysis is dependent upon proposals being considered by the GMPC, as noted above, to 1) amend the Four-to-One program and/or 2) create an Urban Growth Area exchange program. A recommendation regarding adding the parcels to the Urban Growth Area will be determined once the GMPC's work is complete. Whether any land use, zoning, or regulatory changes might be warranted to support any of the desired outcomes if the land were to stay in the Rural Area is also being evaluated; this analysis is ongoing, and recommendations are to be determined. **We want to ensure: (1) Any changes to the 4:1 Program do not enable urban sprawl onto inappropriate lands and (2) A full four acres of Rural land is deeded to King County for every one acre changed to Urban zoning. We are attending the GMPC bimonthly meetings and following its progress on this item, as well as several others.**
3. **Black Diamond Fire Station:** Parcel 0421069092 and the surrounding area. The Scope of Work directed review of whether to add the parcel to the Urban Growth Area or to allow sewer service to the property if it remains rural. The parcel does not meet current requirements for adding property to the Urban Growth Area, as required in Countywide Planning Policy DP-17, 1) a countywide analysis and determination that the size of the Urban Growth Area is sufficient to accommodate growth targets 2) the property does not meet the minimum lot size requirements for the Four-to-One Program and would not meet the requirement that new urban land be used solely for residential development, and 3) the property is not a King County park being transferred to a city for park use in perpetuity or a park owned by a city since 1994. The Growth Management Act (RCW 36.70A.210(3)(b)) does not allow sewer service in the rural area except in limited cases to protect basic public health and safety and the environment. As required by Countywide Planning Policy PF-13, Comprehensive Plan policy F-264, and King County Code 13.24.134, information would need to be provided documenting 1) the specific health and safety problems of the current septic system that are threatening the use of existing structure(s), and 2) how septic system repairs, expansion, or replacement or use of other onsite wastewater systems are infeasible. Without that information, there is currently no basis for allowing sewer access in the rural area or to add the property to the Urban Growth Area. However, the County will be hiring a consultant in 2023 to review the septic system condition, needs and capacity. That analysis will be reviewed once it is complete, and a final recommendation will be made at that time. **We support the above analyses and conclusions. We await the Consultant's analyses and will provide Comment should it be available and used to inform the June 2023 Public Review Draft (PRD).**
4. **Carnation Urban Growth Area Exchange:** Parcels 2125079009, 2125079002, and the surrounding area. The Scope of Work directed review and analysis of removing these parcels from the Urban Growth Area in exchange for adding other, rural land to the Urban Growth Area. Such a change is dependent upon the GMPC recommending creation of an Urban Growth Area exchange program as noted above. In consideration of the potential for creation of such a program, the City of Carnation identified rural parcels that could be exchanged for the parcels that are currently urban. However, the rural parcels do not meet the state's criteria for an Urban Growth Area exchange because 1) more than 15 percent of the rural parcels are impacted by critical areas and 2) the revised Urban Growth Area would increase pressure for urbanization because the new urban area would surround remaining rural lands on three sides. Even in the event the GMPC does recommend use of such an exchange program in King County, the identified parcels would not meet the criteria under state law. Therefore, no land use or zoning changes are recommended. **While we are sympathetic to the desire to preserve these parcels which abut King County's Tolt McDonald Park, we agree with the recommendation that the quality of the land proposed for Urban does not meet criteria. Unfortunately, alternative land appropriate to become Urban, does not abut the Carnation UGA. Carnation could implement a TDR program within its own**

city, which would allow the development units on the farm(s) to move elsewhere in the city. This is complicated, but would achieve the protection of the farm and preserve the potential housing.