

2024 KCCP Major Update Public Review Draft

JOINT RURAL AREA TEAM COMMENTS

July 14, 2023

To: **King County Comprehensive Plan:** CompPlan@kingcounty.gov

Re: **Public Comment— 2024 KCCP Major Update—Public Review Draft**

Please accept *Comments* herein on the subject **2024 King County Comprehensive Plan (KCCP) Major Update (Update)—Public Review Draft (PRD)** from the Joint Team of King County Unincorporated Rural Area organizations (*).

We conducted an in-depth review of all PRD Chapters, Appendices, and Supporting Documents. Our *Comments* encompass KCCP Text, KCCP Policy changes, and changes to King County Code. We also have reviewed the various Studies that are referenced in the PRD. We encourage you to please consider our *Comments* herein to minimize unintended negative consequences to the Rural Area as the County proceeds on the **Update**.

For some Chapters, Appendices, and Supporting Documents we have included *Overarching / Overall Comments* to provide a broad perspective on the subject matter, followed by our *Specific Comments* on Text, Policies, Code, Maps, etc. Our *Comments* primarily deal with items where we offer recommended changes and provide supporting rationale. In general, we have not provided comments on items that we consider good and, thus, approve.

In general, what we see in the PRD is very good, but we do have issues in several areas and we document those in detail herein. The County has many very good Policies and strong Code language, but all too often, either through poor interpretation, spotty followthrough, poorly funded and not-prioritized enforcement, and myriad exceptions / special considerations, the County does not give justice to those Policies and Code in practice on the ground to serve its residents. Consequently, the County's failure to uphold and enforce its own Policies and Code has cost Rural Area residents hundreds of thousands of dollars in legal costs, untold hours of effort, and immense frustration in having to fight their own local government—the County.

There are several major *Themes* we developed as we conducted our review:

- The County's *Guiding Principles* are well developed, but some are poorly followed.
- There are good Policies defining "*Rural Character*," but the County's followthrough is wanting.
- The County has excellent Policies to protect and enhance the environment.
- The County has excellent Policies to protect and enhance parks and open space.
- The financial system for County roads is broken, needs of unincorporated areas are neglected, and city-to-city traffic uses Rural Area roads excessively.
- Urban or urban-serving facilities should not be sited in the Rural Area.

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- The rural economy should not be endangered by allowing urban-serving businesses in the Rural Area.
- Implementation of many great policies and codes is inadequate regarding permitting, land use, code enforcement, and other issues impacting development and uses on Rural Area parcels.
- Unfortunately Growth Targets cannot be enforced to keep *irresponsible* cities, such as Black Diamond, from grossly overgrowing and directly impacting County roads and rural residents.
- Changes to Code are needed, e.g., Special-Use Permits (SUPs), Temporary-Use Permits (TUPs), Conditional-Use Permits (CUPs), etc., must be focussed and limited.
- Permit exceptions should be just that—exceptions for a very specific purpose meeting very specific, temporary, and non-recurring situations or conditions, not the rule.
- Multi-family housing should not be allowed outright in Rural Towns.
- The “*fee in lieu*” concept encourages market rate housing *without* equivalent creation of affordable housing.

We also have included an *Errata* sheet that could prove useful, but is in no way complete.

Our Joint Team endeavors to review, consult, develop, and offer solutions on issues of interest to people who live in a wide expanse of King County’s unincorporated Rural Area. Each of our organizations considers its work on the KCCP one of its most important duties and responsibilities. Indeed, our Joint Team has been through multiple successive KCCP Major Updates (including the *2020 KCCP Mid-Point Update*) with some of our member organization’s work on same going back nearly 20 years to the *2004 KCCP Major Update*.

One of our organizations, the *Vashon-Maury Island Community Council (V-MCC)*, due to limitations in its By-Laws, is unable to complete its review of the PRD in time to meet the July 15 deadline and, hence, is *not* included in the approval “*signatures*” below. We have encouraged the *V-MCC* to submit its comments separately when ready and fully approved and hope the County could make use of them. Consequently, we have *not* included any comments herein on Vashon-Maury Island sections of the PRD.

We intend to continue an open dialogue with the Executive’s Office and staff as the **Update** proceeds to the release of the Executive’s *Recommended Plan* to be submitted to the King County Council in December of this year. We then will engage with the Council as it conducts its reviews and hearings leading to its final approval of the **Update** in December of next year.

Please contact us should any questions arise during the review of our Comments herein. Thank you.

(*) *Joint Team: Enumclaw Plateau Community Association (EPCA), Friends of Sammamish Valley (FoSV), Greater Maple Valley Unincorporated Area Council (GMVUAC), Green River Coalition (GRC), Green Valley/Lake Holm 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 (V-MCC).*

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**2024 King County Comprehensive Plan
Major Ten-Year Update**

Public Review Draft

***Joint Rural Area Team
Public Comment***

Submitted July 14, 2023

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Chapters

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1 - REGIONAL GROWTH MANAGEMENT PLANNING

Theme

- Although the County's *Guiding Principles* are well developed, we see several issues in which they are poorly followed.

Specific Comments

II. King County Planning Framework

A. Public Participation in Planning

p. 1-5:

((R-102)) RP-103a King County ((will)) shall continue to support the diversity and richness of its rural communities and their distinct character by working with its rural constituencies through its Community Service Areas program to sustain and enhance the rural character of Rural Area and Natural Resource Lands.

This new policy is meant to replace policy **R-102** removed from **Chapter 3 - RURAL AREAS AND NATURAL RESOURCE LANDS**, which it does. However, There was introductory text also removed from Chapter 3, but not replaced in any fashion:

~~"In order to implement its goals, objectives, and strategies for broader public engagement, King County has created several Community Service Areas that encompass all of unincorporated King County, including areas without representation by any Unincorporated Area Council. The Community Service Areas provide a conduit for greater participation by all residents in unincorporated King County and increase opportunities for residents to inform county decisions relating to programs and capital projects within each Community Service Area."~~

It appears this also was not included in **Chapter 11 - COMMUNITY SERVICE AREA SUBAREA PLANNING**, especially any discussion of the Unincorporated Area Councils. We recommend it be added back in, either in this chapter or Chapter 11.

C. Countywide Planning

p. 1-7:

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RP-106 *Except for Four-to-One proposals, King County shall not amend the Urban Growth Area prior to the Growth Management Planning Council taking action on the proposed amendment to the Urban Growth Area.*

We don't know why this has not been caught over the years, but this seems to *imply* that Four-to-One proposals are *exempt* from GMPC actions. The wording should be changed for better clarification.

D. Sub-Regional Planning and Partnerships

p. 1-8:

RP-109a **King County should coordinate with cities that abut the Rural Area and/or Natural Resource Lands to ensure that the development review process for large mixed-use developments in a city mitigates impacts on the surrounding Rural Area and Natural Resource Lands.**

This new addition is a good first start, but the County has “*coordinated*” with such cities and, in the case of Black Diamond, testified (both orally and in writing) during its 2010/2011 Master-Planned Development (MPD) Hearings—all to no avail, as all KC concerns, specifically traffic impacts on KC roads, were completely ignored. Until such cities are required (probably through State action) to provide mitigation of their direct impacts to KC roads, such “*coordination*” will continue to be fruitless.

E. Comprehensive Planning

p. 1-9:

((RP-112 **King County shall incorporate approaches to reduce greenhouse gas emissions and prepare for the impacts of climate change into its land use and transportation planning, economic development efforts, and natural resource management.))**

The accompanying “*JC-19*” Comment states this was removed because it is “*Redundant to other policies, including new climate change Guiding Principle.*” There is nothing wrong with redundancy *per se*, if the issue is critically important, as this is, and consistency is preserved. We do understand that “*JC-19*” is referring to new subsections with this KCCP Update, such as **G. Climate Change** on p. 1-24 in this Chapter.

~~(I-)~~ J. Managing Performance

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pp. 1-14 thru 1-15:

Specifically for the Comprehensive Plan, King County has adopted performance measures to track implementation of the Plan's goals, as framed by the Guiding Principles adopted in this chapter. Reporting on the measures occurs prior to each Growth Management Act-required periodic review and update of the Comprehensive Plan, as established in King County Code Chapter 20.18.

RP-120 King County ((will)) shall measure and assess agency performance and the achievement of Countywide Planning Policies and Comprehensive Plan goals.

We applaud the County for a program to measure and manage its performance. However, although the most recent report—*2022 Comprehensive Plan Performance Measures Report*, March 2022: <https://kingcounty.gov/~media/depts/executive/performance-strategy-budget/regional-planning/2024-KCCP-Update/2022-Comp-Plan-Perf-Measures-Report-March2022.ashx?la=en> looks at many good *Performance Measures*, the *Performance Status* discussed does not appear to address departmental performance or any changes contemplated to improve such performance when or where needed.

So, although not part of the Comprehensive Plan other than through Policy **RP-120**, we have many concerns with some *Performance Measures*. Below is a brief discussion of some examples:

5: Peak hour travel is not degrading faster than growth: *Change in corridor peak hour travel times on major routes, compared to population and job change*

This *Performance Measure* does not assess conditions in the rural/unincorporated area of King County, and should be reconstructed, as follows—

- a. Change to the “*Why This Measure Matters*” section to clarify that congestion occurs on roads only and that a multimodal system is the remedy:

As King County continues to grow, roads, sidewalks, and trails will become more congested. To ensure reduce road congestion, an efficient multimodal transportation system is needed, so that residents, workers, and visitors will have need a range of transportation choices to respond to community needs and reduce greenhouse gas emissions and other environmental impacts (RP-204).

- b. Revise the travel time analysis of Figures 13-15 to make it more relevant to rural/unincorporated county roads. First, eliminate all the coverage of corridors in incorporated cities, removing at least 32 of the 42 corridors in Figure 15. Such regional analysis is relevant to the Puget Sound Regional Council, but King County is only responsible for roads in the unincorporated area, so that is where the focus of the figures should go within this Comprehensive Plan. Second, use more current data than the 2015-2019 information obtained from PSRC. Specifically, use the county's own concurrency data for travel sheds. The 2023 update was adopted in June, with recent data from INRIX, the same source used by PSRC. It also monitors many more rural/unincorporated arterials than Figure 15. It makes no sense to

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have a concurrency system mandated by the Growth Management Act, but not to use it in the Comprehensive Plan which is also mandated by the Growth Management Act.

- c. Specifically emphasize in the “*What this means...*” section the growing problem of city-to-city commuting through rural/unincorporated areas and adversely affecting rural quality of life. This is noted in passing in the middle of the section, but needs to be elevated to a primary concern. Rural residents complain regularly of the difficulty accessing arterials from local roads in peak hours, and of noise/pollution impacts due to through traffic. The simple measure of through traffic volumes is sufficient to address both issues (see Appleyard, *Liveable Streets*, 1981), and King County Roads counts traffic on all arterials. Preserving the rural areas is a specific priority of the Growth Management Act, so attention to the preservation of rural residents’ level of service should be a county priority, contrary to the current focus on the speed of through travel.

12: Non single occupant vehicle modes are increasing and per capita vehicle miles traveled (VMT) is decreasing: *Change in percentage of residents using alternatives to the single occupant vehicle, and per capita VMT*

This *Performance Measure* does not address *rural* transportation at all, only *countywide* travel, which seems to only target Metro / Sound Transit. It doesn't describe rural areas. We recommend 12. above be kept, but a *separate* criterion be added to measure rural / unincorporated road volumes, active transportation, and transit—so such is not lumped in with (or simply ignored by) the current criterion which focusses on urban transit. We delve more into this in our Comments on **Chapter 8-TRANSPORTATION**.

13. Farms and forest lands are protected: *Change in total acreage of Agricultural Production District and Forest Production District, including acreage permanently privately protected or in public ownership*

This *Performance Measure* does not address *other* natural resource lands such as those used for mining. Are permit Conditions adequate? Are the meeting of those conditions monitored? Is Code enforced? Are code-required Periodic Reviews conducted? Are lands reclaimed as required? We delve more into this in our Comments on **Chapter 3-RURAL AREAS AND NATURAL RESOURCE LANDS**.

K. Planning Framework Hierarchy

p. 1-17:

Figure: Planning Hierarchy Relationship to Growth Management Planning

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Why does the “KCCP” box only lead to a “*Development Regulations*” box? The KCCP also provides extensive Policies that cover a wide range of issues, etc. We recommend this figure be *re-evaluated* with this in mind.

III. King County Guiding Principles

Guiding Principles

pp. 1-18 thru 1-24:

We fully support all *seven* Guiding Principles. However, we too often see the County making decisions directly affecting the Rural Area that seem to circumvent the following *three* of those principles:

- B. Preserving and Maintaining Open Space and Natural Resource Lands;**
- C. Directing Development Toward Existing Communities;** and
- F. Achieving Environmental Sustainability.**

Such examples (listed alphabetically) include, but are not limited to:

- Asphalt Facility (Determination of Non-Significance, i.e., no Environmental Impact Statement)
- Cedar Hills Regional Landfill (expansion)
- Code Enforcement (poor to none)
- Illegal Clearcutting
- Illegal Event Centers
- Illegal Lots
- Illegal Recycling Centers
- Pacific Raceways (expansion)
- Permits routinely granted for uses violating these principles
- Wineries / Breweries / Distilleries; Tasting Rooms

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2 - URBAN COMMUNITIES

No comments.

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3 - RURAL AREAS AND NATURAL RESOURCE LANDS

Theme

- Although there are excellent Policies defining “*Rural Character*,” the County’s decision-making followthrough is wanting.

Overall Comments

Establish a Rural Area Advisory Commission/Committee

Like the *Rural Forest Commission* and the *Agricultural Commission* described in section **VI. Natural Resource Lands starting** on p. 3-42, the County should consider establishing a *Rural Area Advisory Commission/Committee* comprised of rural residents from across the County, so that any proposals, policy changes, or code updates that affect the Rural Area may first be discussed with members and feedback provided to County staff, Council, and the Executive, as necessary. Our ten Rural Area Organizations and multiple Rural Technical Consultants would offer very qualified and experienced people to serve on such a *Rural Area Advisory Commission/Committee*.

Establish a Rural Landowner Incentive Program

There are Forestry and Agricultural Incentive Programs as described in Policies **R-206** and **R-209**, respectively, and Policy **R-609**. We seek a new Policy for a Rural Landowner Incentive Program, such as:

R-xxx King County shall expand and improve existing programs and explore new programs to incentivize rural landowners to enhancing their land by creating new forestlands, farmlands, or other uses that can benefit climate change goals, the environment, and wildlife.

With such a program Rural Area landowners would be eligible to obtain property tax breaks for enhancing their land which do not fall under the Current Use Taxation program.

Specific Comments

p. 3-4:

“The purpose of the zoning and land use designations in the Rural Area is to provide services and limited goods that ((satisfy rural residents’ and local businesses’ daily needs)) provide for the daily needs of rural residents and businesses.”

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Actually, to be accurate, Rural Area residents do nearly all their shopping, etc. to meet their needs, in urban cities, possibly, some Rural Towns, and, to a far lesser extent, in Neighborhood Business Districts.

I. Rural Area and Natural Resource Lands

pp. 3-6 thru 3-7:

B. Rural Character

We support the description of “*rural character*” in this subsection, the **GLOSSARY**, and throughout the PRD. However, we have found throughout the decades that the County does not value this definition, nor follow its own Policies to protect and preserve “*rural character*” as well as it should. For a recent example, there is nothing in the entire problem surrounding the County Council’s Adult Beverage Ordinance (ABO) (i.e., Wineries, Breweries, and Distilleries—WBDs) that honors “*rural character*,” nor “*agricultural preservation*.”

p. 3-7:

~~**(C. Public Engagement....**~~

~~*“In order to implement its goals, objectives, and strategies for broader public engagement, King County has created several Community Service Areas that encompass all of unincorporated King County, including areas without representation by any Unincorporated Area Council. The Community Service Areas provide a conduit for greater participation by all residents in unincorporated King County and increase opportunities for residents to inform county decisions relating to programs and capital projects within each Community Service Area.”*~~

See our comments in **Chapter 1 - REGIONAL GROWTH MANAGEMENT PLANNING** regarding no replacement for this language on p. 1-5.

II. Rural Area Designation

B. Forestry and Agriculture in the Rural ((King County)) Area Geography

p. 3-10:

R-205 *Uses related to and appropriate for the Rural Area include those relating to agriculture, forestry, mineral extraction, and fisheries, such as the raising of*

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livestock, growing of crops, creating value-added products, and sale of agricultural products; small-scale cottage industries; and recreational and small-scale tourism uses that rely on a rural location.

This policy clearly states: "*Uses related to and appropriate for the Rural Area include those relating to agriculture, forestry, mineral extraction, and fisheries, such as the raising of livestock, growing of crops, creating value-added products, and sale of agricultural products; small-scale cottage industries; and recreational and small-scale tourism uses that rely on a rural location.*" However, there are cases where the County doesn't abide by this. Again, as but one example, the ABO's WBD's do not meet any of these criteria unless one wants claim they "*create value-added products*" or provide the "*sale of agricultural products.*" Which they don't. We strongly support such Policies as **R-205**, but the County all too often fails to follow them.

p. 3-12:

1. Forestry

Immediately under Policy **R-206** is the paragraph starting with: "~~((The Forestry Program will))~~". In that paragraph we recommend that the use of "*preserve*" be replaced by "**conserve**" and the two uses of "*preservation*" be replaced by "**conservation**" in the three sentences proposed to be added. The word "*preservation*" does not imply active management and often turns off cooperating forest landowners. Conservation implies active management and will garner more rural community support. We need to keep in mind that it's the **Land Conservation Initiative**, *not* the Land Preservation Initiative.

p. 3-32:

IV. Rural Public Facilities and Services

The opening paragraph is proposed to be completely removed—most likely due to duplication found in paragraph 2 (the new paragraph 1). However, the removal of the phrase: "~~*provide guidance for siting those facilities that require Rural Area location*~~" with no suitable replacement, eliminates the concept that only those facilities that REQUIRE a Rural Area location can be located there.

pp. 3-32 to 3-33:

We would like our proposed changes below for policies **R-401** thru **R-403** to be *re-considered*. Once again we believe the KCCP should reflect the very *real* concern we enunciated immediately above on p. 3-32.

R-401 ***King County shall work with cities and other agencies providing services to the Rural Area and Natural Resource Lands to adopt standards for facilities and services***

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*in the Rural Area and Natural Resource Lands that protect ((basic)) public health and safety and the environment, but are financially supportable at appropriate densities and do not **require an urban level of infrastructure or** encourage urban development.*

- R-402** *Public spending priorities for facilities and services within the Rural Area and Natural Resource Lands should be as follows:*
- a. *First, to maintain existing facilities and services that protect public health and safety;*
 - b. *Second, to upgrade facilities and services when needed to correct ((level-of service)) level-of-service deficiencies without unnecessarily creating additional capacity for new growth; and*
 - c. *Third, to support **rural-serving** sustainable economic development that is sized and scaled at levels appropriate for Rural Areas and Natural Resource Lands and does not foster urbanization.*
- R-403** *In the Rural Area and Natural Resource Lands, standards and plans for utility service should be consistent with long-term, low-density development and resource industries. Utility facilities that serve the Urban Growth Area but must be located in the Rural Area or on Natural Resource Lands (for example, a pipeline from a municipal watershed) should be designed and scaled to serve **primarily** the Urban Growth Area. Sewers needed to serve previously established urban “islands,” Cities in the Rural Area, Rural Towns, or new or existing schools pursuant to R-327 and F-264 shall be tightlined and have access restrictions precluding service to other lands in the Rural Area and Natural Resource Lands... [The use of the word “primarily” in the second sentence is superfluous, since the policy already refers to “facilities that serve the UGA.”]*

V. Rural Commercial Centers

A. Rural Neighborhood Commercial Center((s)) Designation

p. 3-34:

The Rural Neighborhood Commercial Centers listing shows the following intersection under “*Four Creeks/Tiger Mountain*”: “*Issaquah-Hobart Road/SE Tiger Mountain Road.*” This should be corrected to what it is in the currently adopted KCCP: “*North Cedar Grove Rd SE,*” as this is the *actual* intersection that is zoned Neighborhood Business (NB) and contains local businesses. The intersection listed, should be corrected to: **Issaquah-Hobart Road SE / North Cedar Grove Road SE.**

p. 3-35:

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The Comment on the RH-side of the page states that policy **R-502** has been removed and is consolidated in the proposed modified policy **R-501**. However an important concept was lost: “*accommodate only SMALL-SCALE retail, community and human services, and personal service uses.*” The proposed modified policy **R-501** states: “*...land use designation shall be scaled to be small business areas....*” This does not talk about the scale of the actual businesses, as it does in the currently adopted KCCP. To be clear, the proposed modified policy **R-501** says: “*small business areas,*” and, thus, completely ignores the essence of the proposed to be removed policy **R-502**, which included “*small-scale retail,....*” We recommend the concept of **small-scale businesses** be added to the proposed modified policy **R-501**. to recapture the original meaning of the proposed to be removed policy **R-502**.

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

p. 3-39:

Regarding Policy **R-513**, we understand potential changes are still in work, but we would like to *restate* our concerns.

While we understand KC Code **Title 21A.06.1014F** allows Materials Processing Facilities and Composting Facilities such as Cedar Grove Compost, etc., we also note that according to KC Code Title 21A08.080--MANUFACTURING LAND USES, Materials Processing Facilities are permitted (Condition 16) “*Only [on] a site that is ten acres or greater and that does not use local access streets that abut lots developed for residential use*” or subject to a Conditional Use.

Given the history of Wineries / Breweries / Distilleries (WBDs) which claim to do “*agricultural processing,*” we recommend clear definitions be established for what is meant by “*agriculture and forestry product processing.*” Specifically, we recommend a definition that states: “*Processing applies to agriculture or forestry products grown/produced within King County. It does not apply to raw materials that are trucked in from other locations to be processed at industrial facilities in the King County Rural Area.*” If definitions are *not* tightened up, potatoes grown in Eastern WA could be shipped to a potato chip factory in the Rural Area.

p. 3-40:

We support the following Policy and its proposed modifications:

R-515 ***Existing industrial uses in the Rural Area outside of Rural Towns(~~(, the industrial area on the King County-designated historic site along State Route 169 or the designated industrial area adjacent to the Rural Neighborhood Commercial Center of Preston)) without Industrial zoning currently shall be zoned rural ((residential)) area but may continue if they qualify as legal, nonconforming uses.~~***

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To *complement* the above Policy and to *reinforce* other Rural Area policies herein that seek to protect fragile ecosystems and, especially, those in which the County has invested much money, effort, and time, we recommend adding the following new Policy:

R-515a To protect the Cedar River ecosystem, King County should pursue elimination of all Industrial Zones along the Cedar River by requiring redesignation of the Industrial Zones either upon sale of the properties or upon agreement of the property owners.

VI. Natural Resource Lands

pp. 3-80 thru 3-82:

E. Mineral Resources

We see an issue of mining uses being converted to *non-resource* uses (such as hobby farms, clustered housing, etc.), rather than what the County Code and KCCP Policies have intended, i.e., those lands, on completion of mining, are to revert back to the rural forest resource land base. This has resulted in permanent loss of our rural resources land base. It also further fragments habitat for both plants and animals and decreasing our ability to respond and adapt to climate change. In fact, mining resource land conversion to *non-resource* uses is conflicting with both some of our oldest land use policies for the Rural Area, as well as some of our newest.

Below we have copied and pasted the *text* of this section with the PRD-proposed changes intact and provide our recommended *additions/strikethroughs* in **red** and *supporting rationale* included in **[COMMENT]**. Please note we recommend adding ten *new* policies **R-6aa** through **R-6jj**.

PRD Text:

King County contains many valuable mineral resources, including deposits of sand, rock, gravel, silica, clay, and metallic ores. Mineral extraction and processing these deposits is an important part of King County's economy, currently providing hundreds of jobs and producing materials used locally, regionally, and nationally. ((Mineral extraction also has historic significance, in that it provided the impetus for past development in many parts of King County, including Black Diamond and the Newcastle area.))

*King County is required by the Growth Management Act to designate and conserve mineral resource lands and plan appropriately to protect them, **prioritizing the sites with the least impact to the environment, public health, and safety, and current adjacent land uses.** In doing so the County must assure that land uses adjacent to mineral resource lands do not interfere with the continued use of mineral resource lands in their accustomed manner and in accordance with best management practices. **The focus is to conserve proven mineral resources in the Forest Production District, as***

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~~adjacent land uses are generally more compatible with mineral extraction than siting mines in the Rural Area where homesites are allowed and where many more homes have been developed in recent years. ((The policies in this section explain the steps taken to designate and conserve mineral resource lands and provide direction on the comprehensive review needed before additional sites are designated for mineral resource extraction.~~

[COMMENT: TO BE CLEAR THE ABOVE PARAGRAPH WOULD THEN READ AS FOLLOWS.]

King County is required by the Growth Management Act to designate and conserve mineral resource lands and plan appropriately to protect them, prioritizing the sites with the least impact to the environment, public health and safety, and current adjacent land uses. The focus is to conserve proven mineral resources in the Forest Production District, as adjacent land uses are generally more compatible with mineral extraction than siting mines in the Rural Area where homesites are allowed and where more homes have been developed in recent years.

[COMMENT: Most of the potential surface mineral resource sites were designated decades ago (1994), and now residential development, as well as climate change and other factors, including updated policies have made these sites less viable for development of surface mine sites. The sites that have the highest negative impact, such as those on CARAs, in/near river corridors or next to established neighborhoods should be reevaluated on a schedule along with KCCP updates. If impact is now deemed to have additional adverse impacts as compared to the date of designation, or in light of current standards and policies, then those sites should be evaluated for removal from the list of potential surface mineral resources (yes, we understand that a number of actions must be taken to permanently remove mining sites from the resource site list). This helps the public and potential mineral site owners have greater transparency and certainty for future land-use decisions and investments. In support of the new text regarding adjacent land-uses that we recommend adding above, we recommend the following new policy.]

R-6aa The County shall focus of conservation of proven mineral resources in the Forest Production District, as adjacent land uses are generally more compatible with mineral extraction than siting mines in the Rural Area.

[COMMENT: The County should review the top quartile of potential surface mineral sites (or grouping of nearby sites) with the highest collective impacts, based on the best available science and using an objective criteria and rating system defining impacts and risks to public health, environment and public resources such as roads, water sources, rivers, and parks. The potential sites that show impacts above a certain threshold should be removed from the list of potential surface mineral resources.]

PRD Text:

~~Four main steps are necessary to support and maintain local availability of mineral resources. First, mineral resource sites should be conserved through designation and zoning. Second, land use~~

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~~conflicts between mineral extraction, processing and related operations and adjacent land uses should be prevented or minimized through policies and assessment and mitigation of environmental impacts. Third, operational practices should protect environmental quality, fisheries and wildlife, in balance with the needs of the industry. Finally, mineral extraction areas need to be reclaimed in a timely and appropriate manner, recognizing adjustments to the mine plan and revisions to permits can no longer be used to delay the reclamation process.))~~

The Mineral Resources Map identifies three different types of Mineral Resource Sites – Designated Mineral Resource Sites, Potential Surface Mineral Resources, and Nonconforming Mineral Resource Sites and Existing Mineral Resource Sites in the Forest Production District. The sites were identified in the 1994 King County Comprehensive Plan or in subsequent annual updates. Before the Mineral Resources Map is a table that contains information on each Mineral Resource Site parcel.

~~((The Designated Mineral Resources Sites on the Mineral Resources Map satisfy King County's responsibility to designate and conserve mineral resources consistent with requirements of the Growth Management Act. All Designated Mineral Resources Sites have Mineral zoning. Most of the Designated Mineral Resources Sites shown on the map contain sand and/or gravel; however, a few contain other mineral resources such as silica, rock, stone, shale, and clay. The criteria used in the 1994 King County Comprehensive Plan called for designation of properties that at the time were either zoned outright for mining or those operating under an approved Unclassified Use Permit.))~~ In addition to the designated Mineral Resources Sites, the Forest Production District and Forest (F) zone preserves the opportunity for mineral extraction, **but recognizing mining takes land out of forest production, and reclamation is not fully effective to restore it to the same forest productivity that existed before the surface mining. Further, maintaining a critical level of ~75% forest cover in a specific watershed basin helps to maintain proper rainfall and supply of cooler water for areas designated as important for salmonoid habit per the Basin Planning process. Sites further away from watershed basin resources should be prioritized for development over sites that have greater impact on watershed resources.** Mineral extraction is a permitted or conditional use in the F zone. Because forestry does not preclude future mineral extraction, King County considers the Forest Production District as part of its strategy to conserve mineral resources.

[COMMENT: In support of the new text regarding forest cover that we recommend adding above, we recommend the following new policy.]

R-6bb The County shall prioritize protecting forest cover, working forests, salmon habitat and watershed health when siting mining and mineral and gravel extraction. Sites further away from watershed basin resources shall be considered for higher priority for development over sites that have greater impact on watershed resources. When mining ends, a high priority shall be given to mining site restoration to the fullest extent possible.

[COMMENT: Below is another new policy we recommend adding (further explanation immediately following).]

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R-6cc The County shall permit mineral extraction sites to size mines only as large as needed, not necessarily using all the acreage available. The reclamation of these shall be defined before development, and subsequent changes to the permit or plan cannot delay reclamation by more than 125% of the period allowed on the original permit.

[COMMENT: Mine reclamation is a big expense and if done correctly and safely, does not generate the same revenue to owners as the extraction phase. Mine operators have typically used mine plan changes and permit updates to delay the reclamation process, and often work to go out of business/bankrupt before full reclamation phase takes place. County Code needs to be implemented to discourage and, if possible, prevent this.]

Recommended New PRD Text:

The majority of the potential mining sites in King County are defined for sand and gravel or rock. The geology of King County is such that these types of resources are extremely plentiful, and there is not a need to preserve every potential site that has some sand and gravel or rock potentially available. However, we do need to define and preserve where these resources are plentiful, closest to where they are consumed, least expensive to extract, where impacts current and future are lowest to the environment, public health & safety and adjacent land uses.

[COMMENT: In support of this *new text* above regarding *preserving sites*, we recommend the following *new policy*.]

R-6dd The County shall define and preserve sites where key resources, such as sand, gravel, and rock, are plentiful, and closest to where they are consumed.

Recommended New PRD Text:

Transport of these heavy materials uses a lot of diesel fuel and is extremely carbon intensive. In the selection of these sites the County shall provide more consideration to minimizing haul distances and employing more cost- and energy-efficient modes of transport, such as barge and rail, over road transport, etc. Siting future mineral extraction closer to consumption will have a positive impact on meeting the County's climate goals, as mining is one of the most carbon-intensive industries in the County. Siting closer to consumption or to use rail or barge facilities more effectively, will also increase public health and safety, as well as reduce the expenditure of public funds to maintain the County's road network, by reducing haul truck road miles.

[COMMENT: In support of this *new text* above regarding *transport*, we recommend the following *new policy* (further explanation immediately following).]

R-6ee To help achieve the County's Climate goals and to positively affect public health and safety, transport of heavy mineral-extracted materials, both to where they will

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be consumed, and to deliver materials for fill and reclamation, shall be considered in planning.

[COMMENT: Please note that an efficient example of using conveyers to barge transport is Glacier's large Dupont sand and gravel mine that delivers aggregate materials to downtown Seattle or West Seattle at a low cost per ton. There will be other benefits to reducing haul truck road miles, such as much less rubber dust from tires polluting our waterways and threatening what remains of our salmon and orca populations.]

Recommended New PRD Text:

Clustering of mineral extraction operations of same or similar materials is another issue that needs to be better managed. The result is inefficient distribution of sites across the County or region – where again, the geology suggests these materials are present, even plentiful over most of our County and region, particularly as you get closer to the Cascade mountains. This clustering, tends to put more impacts on certain communities – impacts not equally distributed.

[COMMENT: In support of this new text above regarding *clustering/distribution of sites*, we recommend the following new policy (further explanation immediately following).]

R-6ff The County shall project the amount of mineral resources needed for medium and longer term growth, and where these materials are expected to be consumed. Such information shall be shared with affected communities for an informed discussion of which mines are targeted for expansion, which can be targeted to close, and approximately where more new mines are needed to meet future growth.

[COMMENT: The current process puts industry in the driver's seat and favors the big international major players such as LafargeHolcim (France/Switzerland), Martin Marietta (United States), LSR Group (Russia), HeidelbergCement AG (Switzerland), CEMEX S.A.B de C.V. (Mexico). The County needs to be more involved in deciding where and, especially, when to develop a new mine, rather than waiting for the chance that someone who happens to own land in a certain area decides to apply for the rigorous permit process. It makes more sense for the County to define when and where new sites are developed for mining aggregate materials, so that supply can be phased in when and where needed, and without excessive land resources being devoted to mineral extraction—at the expense of other land uses—at any one given time.]

Recommended New PRD Text:

Complementary industrial activities, such as limited landfilling of inert materials, as part of mine operations, should only be allowed on an exceptional basis with separate permits and specific regulation and oversight. Only a small portion of the mines should be allowed to accept inert

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materials, as to reduce regulatory resources needed, and to discourage permitting new mines as a pretext for landfilling or similar commercial activities.

[COMMENT: Current practices encourage overfilling or excessive disposal activity during site reclamation. This has included acceptance of off-spec and contaminated materials that present future potential impacts and threats to human health and the environment. As a result, permit requirements to restrict off-spec and contaminated materials and limiting fill to pre-existing contours should be strictly enforced with substantial penalties for violations. In addition, reduction in fill to something less than original contours should be considered where that will meet the underlying goal of returning the site to its *pre-existing* zoned use, in most cases as forest resources land. In support of this *new* text above regarding landfilling on sites, we recommend the following *new* policy.]

R-6gg The County shall prohibit the importing wood waste from land clearing (e.g., tree stumps), construction & demolition waste, or any toxic substances at any mineral extraction site.

Recommended New PRD Text:

The mining/industrial-specific public complaint and monitoring process should help facilitate information gathering related to such activities. More effective alerts, and rapid sharing of information between County departments (e.g., Permitting, Public Health), as well as State Department of Resources and Ecology are needed to prevent illegal activities.

[COMMENT: In support of this *new* text above regarding *monitoring and complaint processes*, we recommend the following *new* policy.]

R-6hh The County shall offer a monitoring and complaint process specifically designed for review of mineral extraction or rural-industrial activities. This shall include public access to tools available to County inspectors, such as recent aerial imagery, LIDAR, test well reporting, and NASA TEMPO air pollution monitoring.

[COMMENT: Below is new policy we recommend adding (further explanation immediately following).]

R-6ii The County shall prevent and limit the privileges to apply for permits of owner/operators of mineral extraction who repeatedly fail to comply with permit conditions, county code, or state and federal laws and rulings.

[COMMENT: The long-term impacts of such violations are so great, and allowing such parties to continue to apply for additional permits consumes an extraordinary amount of public resources, and distracts County and public from other issues and opportunities that also need attention.]

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PRD Text:

*The Mineral Resources Map also shows Potential Surface Mineral Resource Sites. These are sites where King County may allow some future surface mining to occur or where the owner or operator indicates an interest in future mineral extraction. ((The Potential Surface Mineral Resources Sites shown on the map do not indicate the material. Because of the geology of King County, most valuable metallic mineral resources are located in the Forest Production District, and are therefore already protected from urban development.)) Identification of Potential Surface Mineral Resources Sites satisfies the Growth Management Act requirements to not knowingly preclude opportunities for future mineral extraction and to inform nearby property owners of the potential for future mineral extraction use of these areas in order to prevent or minimize conflicts. **The County will endeavor to inform affected communities in advance of set public comment periods and permit decisions.***

Recommended New PRD Text:

Non-conforming sites need to be reviewed to latest science as they often have greater potential negative impacts. Efforts should be made to define sunsets for each of these sites with well-defined and funded reclamation plans, that cannot be delayed.

[COMMENT: In support of this new text above regarding non-conforming sites, we recommend the following new policy.]

R-6jj The County shall review non-conforming sites based on the latest science so as to reduce their potential negative impacts. Sunsets for each of these sites shall be defined and funded reclamation plans shall not be delayed.

[COMMENT: Owners/operators of these sites have benefited from these sites for longer periods with less regulation to start up, so should not also be rewarded with the privilege to sell or transfer these as a mineral extraction operation. Instead, the considerable impacts of these non-conforming sites is best mitigated by full and proper reclamation of the site to the original/previous use and zoning of each property.]

PRD Text:

The Mineral Resources Map also shows Nonconforming Mineral Resources Sites. These are sites on which some mining operations predated King County zoning regulations without appropriate zoning or other land use approval. Mining for these sites has not been authorized through a land use designation or zoning classification. These sites are shown for informational purposes only. Mining can occur on an identified site only if mining has been approved as a nonconforming use by the Department of Local Services - Permitting Division, and mining activities have received all other

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necessary permit approvals. Because the sites have not undergone formal review to be designated on the Land Use Map or zoned for mining, the sites do not have long-term commercial significance, and for which ownership cannot be transferred or sold as an on-going mineral extraction operation. Active reclamation for these non-conforming sites cannot be delayed with additional permits or changes, to bring clarity for owners and community of when each site will conclude/sunset. However, they can continue to serve mineral supply needs.

[COMMENT: Our immediate prior COMMENT on *non-conforming sites* provides our supporting rationale for the *new text* we recommend above.]

End of our comments and recommended additions/deletions for the **E. Mineral Resources** subsection.

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4 - HOUSING AND HUMAN SERVICES

No comments.

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5 - ENVIRONMENT

Theme

- The County has excellent Policies to protect and enhance the environment.

Overall Comments

We find some strong policies herein, but they depend on how they are implemented, if and how periodic monitoring is funded and staffed, and that enforcement, when needed, happens. Our experience has been that each of these have been problems for many years and that structural changes will need to be considered before the County can truly honor the good policies herein.

Specific Comments

p. 5-3:

This contains examples of very good overarching strategies:

Individual species protections under the Endangered Species Act continue to play an important role. At the same time, both nationally and internationally, many governments are initiating multi-species approaches aimed at conserving biodiversity. Biodiversity refers not only to plants and animals but also to their habitats and the interactions among species and habitats.

Protection of biodiversity in all its forms and across all landscapes is critical to continued prosperity and quality of life in King County. In fisheries, forestry, and agriculture, the value of biodiversity to sustaining long-term productivity has been demonstrated in region after region. (~~With the impending effects of climate change, maintaining biodiversity will be critical to the resilience of resource-based activities and to many social and ecological systems. The continued increase in King County's population and the projected effects of climate change make conservation a difficult but urgent task.~~) The protection and restoration of biodiversity and of a full range of supporting habitats is important to King County. King County will incorporate these considerations in its operations and practices, ranging from its utility functions (such as wastewater, solid waste and storm water management) to its regulatory and general government practices.

p. 5-4:

This contains another example of very good intentions that will need strong *implementation* through rigorous permitting and enforcement:

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Untreated storm water runoff remains the largest source of pollution to Puget Sound. Storm water management requirements and practices continue to evolve, with greater emphasis on “low impact development” and green storm water infrastructure that can mimic the natural functions of soil and forest cover in slowing and filtering storm water runoff by infiltrating or dispersing storm water onsite, or by capturing and reusing it. Modifying storm water facilities, or building new ones in previously developed areas, is very expensive. The County is developing tools using best available science to identify and prioritize actions to achieve the best outcomes for reducing pollution to Puget Sound. The County is also partnering with cities, Indian tribes, other counties, and non-profits to identifying where projects like “storm water parks” can provide the greatest environmental benefit while increasing access to open space in historically underserved areas.

We have been bothered for some time about the *single-species approach* (e.g., Chinook); however, there is strong language throughout the proposed PRD to emphasize a *multi-species approach*, including on p. 5-5 below:

I. Natural Environment and Regulatory Context

A. Integrated Approach

p. 5-5:

Environmental protection efforts need to be integrated across species, habitats, ecosystems, and landscapes. Efforts to reduce flooding or protect water quality and habitat cannot work successfully in isolation from management of land use across the larger contributing landscape. Efforts to protect one particular species or resource type could be detrimental to another if such efforts are not considered in an ecosystem context.

We support this, but, as with all of this, *implementation* is key. As an example, in the Bear Creek basin, all the first properties bought under Waterways 2000 were inventoried by a biologist hired by the County (the Basin Steward hired and accompanied). These surveys were wonderful and were used as the basis of the Management Plans for the property and future restoration plans. Unfortunately, it lasted a very short time and many of the restoration suggestions have not been implemented. So how do we make this happen over a much bigger scale and longer time frame? Also, the Basin Stewards as originally conceived, were watershed based and strengthened and involved local private groups. Now they are primarily grant writers – great ones but a different role.

IV. Land and Water Resources

A. Conserving King County’s Biodiversity

1. Biodiversity

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p. 5-37:

E-404 *King County should collaborate with other governments and private and non-profit organizations to establish a bio inventory, an assessment and monitoring program, and a database of species currently using King County to provide baseline and continuing information on wildlife population trends in the county.*

This has been a good Policy, but, again, it is another thing that will not happen without a commitment to *funding* the work

3. Biodiversity Conservation Approaches

b. Habitat connectivity

p. 5-40:

E-410 *Habitat networks for threatened, endangered and Species of Local Importance, as listed in this chapter, shall be designated and mapped. Habitat networks for other priority species in the Rural Area and Natural Resource Lands should be identified, designated and mapped using ecoregion information about the county and its resources and should be coordinated with state and federal ecosystem mapping efforts as appropriate.*

During the very first meeting first meeting of the Bear Creek Basin Plan Citizen Committee the public came to ask how to deal with beavers—and that was 1987! Again, funding and real help is necessary.

D. Aquatic Resources

7. Beavers and Beaver Activity

p. 5-81:

E-499ii *King County supports the coexistence of beavers and people in rural King County. King County should prepare a beaver management strategy and regulatory changes to guide a program on issues such as where and how beavers and humans can co-exist with (~~or without engineered solutions and where beavers should be excluded or removed~~) tools for coexistence and methods for beaver exclusion when necessary.*

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We support this Policy and the proposed changes, but, again, we remain concerned there will be adequate *funding* and Staff to do it?

p. 5-97:

E-708 ***King County should implement a framework for effectiveness monitoring of critical areas regulations, and use monitoring data to inform the future review and updates of its critical areas policies and regulations.***

We again have concerns about *implementation* and adequate *funding* to do so.

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6 - SHORELINES

No comments.

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7 - PARKS, OPEN SPACE, & CULTURAL RESOURCES

Theme

- The County has excellent Policies to protect and enhance parks and open space.

Overall Comments

As with Chapter 5 - ENVIRONMENT, we find some strong policies herein, but they depend on how they are *implemented* and *funded*.

As far as public involvement, King County seems to not be adequately staffed. As an example, Tina Miller used to organize, in partnership with the community, Restorations, etc. However, with her retirement, we are not aware of these continuing. Again, we remain concerned about implementation.

Another concern is funding sources, as King County Parks relies almost totally on the voter-approved Levy every six years and entrepreneurial events like concerts at Marymoor Park. It has not received General Fund funding for a very long time. Although we have confidence in the voters of King County, we still see Parks as vulnerable.

Specific Comments

I. Parks, Recreation and Open Space

B. Components of ~~((the Regional))~~ King County's Open Space System

3. Regional Trails ~~((System))~~ Network

pp. 7-6 to 7-7:

P-109 *King County shall complete a regional trails ~~((system))~~ network, linking trail corridors to form a countywide network. King County will continue to primarily own the land necessary for the operation and management of the trail ~~((system))~~ network and pursue public-private funding opportunities for development and maintenance, while ensuring opportunities for access for all King County residents, both urban and rural.*

[COMMENT: The current system of regional trails is extensive, but unlike our neighboring counties of Snohomish and Pierce, the network primarily located in urban areas, within the

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UGA. There is an increasing need for the County regional trail system to further expand to fulfill the objectives of the Leafline Trails Coalition, in which the County is a major part:

- **Provide more equitable access to safe places to walk and bike**
- **Offer reliable and healthy transportation options**
- **Grow the region's economy by adding jobs, connecting businesses to customers and employees, and providing millions of dollars in healthcare savings**

Yes, Eastrail is important and will be increasingly important for active transportation and commuting. Although, now and not later is the best time to renew efforts to complete connections in the rural areas of the County. Choices for right-of-ways are still available in the Rural Area, but residential development and increasing cost of land will soon make routing of new trails much more difficult. Further, now with e-bikes and other mobility options, these more rural trails can better serve dual use as active transportation infrastructure, as well as preferred recreation destinations for people from our more urban areas and tourists. Trails and Open Space passive recreation tourism is and will increasing be important for sustainable small-scale economic development in the Rural Area. The value of this tourism, both in public interest and dollars, builds environmental awareness and advocacy that will help us as a community to conserve our natural resources, such as river corridors.

Travel by bicycle and similar micro-mobility will become increasingly important as the population of our region grows, but inevitably roads and public transport cannot meet the demand. Commuting and travel by bicycle and micro mobility will become more convenient as the regional trail system builds out, and as road transport becomes overcrowded and less reliable. Trail are an important way people can connect to public transit, without the need or reduced need for a car, or for land for parking.

We encourage the County to shift its near-term focus on land acquisition, then planning and construction of lower-cost unpaved surface trails, then later, as budgets allow, upgrade these to higher specifications with pavement and bridges. The typical e-bikes and now popular gravel bikes allow greater use unpaved trails.]

In light of our **[COMMENTS]** above we recommend the following *new* Policy:

P109a King County shall plan and further develop the Snoqualmie Valley Trail and Foothills Trail to enhance connectivity between cities in the Rural Area, as well as to trail systems in adjacent counties, and to facilitate statewide and national trail connection transportation routes. This effort includes partnering with Seattle Public Utilities to find a solution to extend the Cedar River Trail to Cedar Falls.

II. Cultural Resources

We recommend **additions** to the following *four* Policies in this section:

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p. 7-16:

- P-203** *King County shall encourage preserving, reusing and recycling historic buildings in its facilities planning and other relevant actions. **King County shall assist in encouraging interested parties in pursuing preservation, restoration and repurposing projects, particularly those doing repairs/upgrades themselves.***

A. Relationships

p. 7-17:

- P-208** *King County shall pursue its cultural resource goals by working with residents, property owners, cultural organizations, public agencies, tribes, schools and school districts, **media** and others.*

- P-209** *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. **King County shall reach out to citizens/organizations within their purview to facilitate cultural/heritage projects/goals.***

C. Historic Preservation

p. 7-18:

- P-217** *King County shall acquire and preserve historic properties for use by county and other public agencies and shall give priority to **and support efforts involved in** occupying historic buildings whenever feasible.*

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8 - TRANSPORTATION

Theme

- The financial system for County roads is broken, needs of unincorporated areas are neglected, and city-to-city traffic uses Rural Area roads excessively.

Overall Comments

We elaborate on our Theme, in general, below and suggest in our Specific Comments (further below) how to implement improvements throughout **Chapter 8**. Separately, in **Appendices C** and **C1**, we offer general suggestions for supporting technical changes. Additional technical work by the County would be needed to implement those general suggestions.

Needs of unincorporated areas are neglected:

With respect to transportation, the draft Plan (PRD) - as well as the Plan now in force - does not adequately serve and protect unincorporated areas as GMA requires. These areas constitute 11% of the countywide population but are 100% of the population for whom King County is their local government. Half of this population is in “urban” unincorporated areas adjacent to cities and such areas may eventually be annexed into those cities. The county’s management of roads will thus move increasingly toward a rural area focus as annexations occur. The county’s responsibility for transit is, however, countywide in nature, including transit service to, within, and on behalf of all incorporated cities and towns. This enormous disparity in rural vs. urban services is unique to King County. Transit in other counties is operated by separate transit agencies.

Unlike transit, King County’s responsibility for roads is only in the unincorporated areas. The historic orientation of county road standards, functional classifications, level of service standards, and other policies has been to support all traffic wherever it occurs. This means in practice supporting through traffic at higher speeds, with little support for local access. While that approach befits a state highway system, supporting through traffic over local access does not properly serve rural residents for whom the county road system is also their local access system. And prior to the era of growth management, before many new cities were incorporated or grew by annexations, most traffic on rural roads was also rural in origin and the county enjoyed a much healthier funding base from a larger county road tax on that larger rural area. At that time the unincorporated area was more or less the same as the rural area. After growth management became law, much of that changed. The administration of rural roads has not changed with it, unfortunately.

There are several new directions gaining momentum nationwide that seek to shift the focus of transportation programs to other goals that would help mediate between these conflicting needs, including for rural roads. Such initiatives have names such as “traffic calming”, “Complete Streets”, “Target Zero”, and “Safer Streets”, among others, and King County acknowledges such initiatives in some ways. But the PRD needs to highlight more forcefully how these approaches to managing the

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transportation system can be used to better serve and protect the unincorporated population, especially in rural areas.

The rural area can also be better served by taking a different view of the role of transit. Clearly, traditional fixed-route transit service is not cost-effective in rural areas. The greater need in rural areas is to remove more commuter trips from the rural road system by offering higher levels of fast bus service between outlying cities and the urban core. More regional transit resources should be directed in this direction to mitigate the damage to rural areas caused by GMA-mandated growth in outlying cities.

Road standards, level of service standards, and the transportation concurrency system are all biased toward support of through travel on county arterials in rural areas at the expense of rural residents' access to same roads. In rural areas there are so few connecting roads that many of the very roads relied on by rural residents for local access have been classified as minor arterials, even principal arterials. But these arterials are simultaneously the "neighborhood streets" of the rural area. These standards should focus more on preserving the local access function of county arterials in rural areas. In particular, based on the actual technical definitions in Appendix C of "collector arterials", "minor arterials" and "principal arterials", it appears that several county roads should be reclassified downward if the function of local access to rural residences is to be honored.

City to city traffic uses rural roads excessively:

While GMA has largely succeeded in preventing urban sprawl into rural areas, an unintended consequence of GMA's requirements has been the conversion of several outlying small rural towns into cities, and then requiring them to grow just like cities in the urban core. This anomaly is well known. But the consequences of GMA's codified rigidity have not been addressed. While development in rural areas has indeed been effectively prevented, these outlying cities are becoming new bedroom suburbs located even further away from the urban core. This is the exact opposite of GMA's intent.

Long distance commuter traffic from these outlying cities to urban core jobs passes through the rural area GMA intends to protect. This effect extends beyond King County into adjacent parts of Pierce County and Snohomish County as well. High traffic volumes are thus added to rural county roads built long ago for low volume rural conditions. State highways whose mission is to connect cities should ideally serve such traffic but state routes are too few and too far between. The outcome is a degraded quality of life for the rural population for whom those rural arterials are their local access roads. Furthermore, these conditions are projected to become significantly worse over time, according to regional studies referenced in Transportation Appendix C.

Most cities strive to keep through trips on principal and minor arterials, away from neighborhood streets and collector arterials. Similar action is needed in the rural area to protect rural residents from commuter traffic. Improved policies would provide more appropriately for intercity travel by relying more on state highways and even transferring some county principal arterials to the state, by adding more intercity transit commuter service, by applying travel demand management strategies to reduce demand, and by revising county road standards to emphasize the use of rural county roads by rural residents more than by through traffic between cities.

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Financial system for county roads is broken

The financial basis for the county road system is broken, as is well documented in Transportation Appendix C. But the body of Transportation Chapter 8 does not highlight this problem nor provide any solutions. The description of a “Strategic Plan” gives the false impression that the situation is being managed. Section IV of the plan discusses finances and summarizes the situation but downplays the grim reality that funding under current laws can only provide about 12% of the funds needed according to the Transportation Needs Report (Appendix C1). That TNR makes clear that drastic reductions of the connected road network must commence within about six years.

The Comprehensive Plan needs to be much more upfront about which roads and bridges will not be maintained, which services will be terminated, which communities will suffer reduced mobility as a result, and how the economy will be damaged. Such draconian messages are necessary to elicit responses from lawmakers who control public finance.

This problem has been recognized for several years, and remains unresolved. The time is now to elevate this matter to the forefront of the Comprehensive Plan, not wait another ten years. King County cannot produce the needed revenues on its own (this is touched upon in **Appendix B—Housing Needs Assessment** under “*Lack of Revenue Tools*” on p. B-132). Regional and state level solutions are needed for this critical issue. This is alluded to in Section IV but more should be said.

For example, a regionally uniform transportation impact fee schedule could be based on new vehicle-miles of travel (VMT) added by new developments. Data to implement such a schedule already exists in the PSRC regional travel forecasting model. A regional system would benefit all jurisdictions, not just unincorporated King County, by distributing the collected fees according to where VMT impacts are felt. This would solve the problem of impacts across jurisdictional boundaries without resorting to difficult case-by-case interlocal agreements. A VMT-based fee system would also have the same technical foundation as would the anticipated conversion of the state gas tax to a road user charge based on VMT. Supporting state legislation may be needed as well, depending on details.

We also note that state legislation (HB1181) passed in 2023 requires revisions to this comprehensive plan in the direction of supporting climate action and specifically to reduce vehicle-miles-of-travel, by 2029. We support that direction and look forward to such changes, sooner than 2029 if possible.

Specific Comments

Our recommendations appear as red when recommending changes to Text and bold red when recommending changes to Policies.

p. 8-1:

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This chapter's opening paragraph should add words to acknowledge that the county road system increasingly serves travel between cities, on roads built for low-volume rural conditions, and the financial system for maintaining county roads is no longer viable for a number of reasons.

pp. 8-3 thru 8-4:

**I. Creating an Integrated, Sustainable, and Safe
Transportation System that Enhances Quality of Life**

A - Introduction

To the opening paragraph of section A add another sentence:

At the same time, the road system managed by King County is located solely in unincorporated areas, much of which is rural, and the local access needs of rural residents must be maintained.

Add these bullet points:

- Preserve and protect the local access function of county roads for residents of rural areas against the impact of through travel between cities using those county roads.*
- Emphasize transit for intercity travel to reduce traffic impacts on rural roads*
- Devise and implement performance functions that preserve and protect the local access function of county roads in rural areas.*

p. 8-5:

Conclude section A with this additional sentence:

As elaborated in Appendix C1 (Transportation Needs Report) the projected shortfall of road funds will reach a crisis point by 2029. This will reduce the services that can be sustained to below the existing level of operations. If new funding sources are not established by then, some bridges may be taken out of service, some roads may not be maintained and/or may be closed, and the scope of other road services will be curtailed.

p. 8-6:

D – Transportation System, Services, and County Responsibilities

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Follow the itemized list in section D with this additional sentence, before the final sentence referring to King County responsibilities:

This regional network is provided and maintained by a combination of state, regional, and local jurisdictions.

p. 8-11:

2 – Road System

Conclude the last paragraph of section 2 with this additional sentence:

Furthermore, if additional funding sources are not brought on line within the next few years, it will be necessary to reduce the number of bridges, miles of roads, etc., that the county maintains, regardless of the pain that may inflict upon the users of the system and the economy of the region.

3 – Air Transportation

Begin this section with the following additional paragraphs:

GMA requires an inventory of all transportation resources; however, King County is not responsible for managing most aviation resources listed below.

Seattle-Tacoma International Airport (SEA) is the ____-busiest commercial airport in the nation and a significant asset for the region's economy. SEA is owned and operated by the Port of Seattle. Analysis by the Puget Sound Regional Council (PSRC) projected that SEA could reach its maximum operational capacity by the year 2050.

The Commercial Aviation Coordinating Commission (CACC), a state agency in effect 2019-2023, studied potential new airport locations statewide to supplement SEA's capacity by 2050. CACC's work was based on several ground-side suitability factors, not air-side operational factors. The Enumclaw Plateau was one of these locations. CACC's final recommendation indicated none of the identified sites were suitable. A Federal Aviation Administration (FAA) report submitted separately to the Aviation Division of the Washington State Department of Transportation found that the Enumclaw location was unsuitable due to serious aviation conflicts with existing airspace requirements of SEA and McChord Field (military), as well as issues with airspace restrictions and air stability within close proximity to the Cascade Mountain Range.

The state legislature in 2023 authorized a new Commercial Aviation Work Group to further evaluate increasing capacity at existing airports throughout the state, before considering siting a new airport. The CACC final recommendation also included future analysis of expanding service at Paine Field, Yakima Air Terminal, and consideration of joint military-civilian use of McChord Field.

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Renton Municipal Airport is owned and operated by the City of Renton and used by the Boeing Company and general aviation.

A suggested policy on locating a new commercial airports in King County appears in the next section.

p. 8-13:

E – General Policy Guidance

Policy **T-106**, and the Strategic Plan to which it refers, should be amended to include:

As the provider of road services to residents of the unincorporated area, King County shall strive to use its limited funds primarily to maintain local access and mobility for the residents of that area.

A new Policy **T-xxx** should be added, as follows:

T-xxx. A new commercial airport, when and if needed for statewide travel purposes, should not be located within the boundaries of King County because the airport capacity of SEA is more than adequate to serve the needs of King County’s total population, the land area needed would severely impact existing land uses, and the airspace needed would conflict with existing airports and/or nearby mountains.

At the bottom of this page, after the introductory paragraph under section II, add the following sentence:

This may include city to city transit service beyond existing plans, for the purpose of reducing commuter travel from outlying cities in the rural area. This multi-modal strategy is needed to reduce growth impacts on the rural area between the cities. Transportation actions of this kind would also comply with requirements of climate action legislation passed in 2023.

p. 8-15:

II. Providing Services and Infrastructure that Support the County Land Use Vision

A – Land Use and Growth Strategy

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On page 15, third paragraph, fifth line, change the word “*certain*” to “*small*” for better parallelism with following clauses.

Add to same paragraph at the end:

The vast majority of traffic growth on county roads in the unincorporated area (and especially the rural portion thereof) comes from growth in adjacent Cities and adjacent Counties, and is a significant challenge to preserving rural lifestyle and character.

The use of the word “*urban*” in the fourth paragraph is not clear as to whether the entire Urban Growth Area is intended, or just the urban portion of the unincorporated area. To better focus on the county’s responsibilities apart from those of adjacent cities, insert the word “*unincorporated*” before “*urban*” in the first sentence, and the second sentence. Further modify the fourth sentence to read as follows:

In several areas of the county, regional arterial corridors link the Urban Growth Area with isolated Cities in the Rural Area by crossing Rural Areas and Natural Resource Lands.

Add to the last sentence in this paragraph:

“...and to maintain adequate local access to existing land uses in the Rural Area.”

In policies **T-201**, **T-202**, and **T-204**, delete the phrase “*as resources allow*” or “*as funding permits.*” These phrases signal an intention to ignore the associated policy to save money, which guts the policy. Let the financial issues be resolved another way. Same comment may apply elsewhere as well.

Policy **T-202** is good for its emphasis on preserving rural character. Many of our proposed revisions implement the same thought elsewhere.

Policy **T-203** is good for its emphasis on multimodal opportunities, but why limit that emphasis to partnering situations? King County should have this emphasis throughout its program of road management, referring wherever possible to the Complete Streets concept.

p. 8-16:

Section B. Travel Forecasts

Add to end of first paragraph:

While all cities and the county have agreed to plan for these growth targets, the City of Black Diamond has adopted much higher growth targets in its own comprehensive plan, without

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considering the impacts of such growth beyond its borders, especially traffic on county arterials through the Rural Area. Those impacts are also not considered in any forecasts by the PSRC.

C. Public Transportation System

Add to policy **T-204** (or add a new policy?):

In addition, King County should seek to reduce traffic growth on county arterials through the Rural Area by increasing express transit services between the Cities in the Rural Area and the core cities of the Urban Growth Area.

p. 8-17:

D. Road System

Avoiding new road construction in the Rural Area has long been seen as a positive stance for environmental reasons which we have supported. In support we recommend the following:

Add at the end of Policy **T-207**:

“...and to decrease the use of county rural arterials by trips between Cities in the Rural Area and the core Urban Growth Area.”

p. 8-18:

E. Airports.

Expand this list of rural general-aviation airports to include Enumclaw Airport and Evergreen Sky Ranch. Both are mentioned in the existing (although antiquated) Enumclaw Subarea Plan referenced in PRD Chapter 11. Airports by all operators should be accounted for.

Further, why are ferry operations inventoried in the appendices, but not accounted for in this section of chapter 8 ?

p. 8-19:

F. Level of Service Standards

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Fifth Paragraph, fifth line: replace the first word “typically” with “*such as but not limited to.*” There are many other cases of Minor Arterials throughout the Rural Area carrying heavy traffic volumes too great for compatibility with rural character.

At the end of this paragraph, add a sentence:

In addition, even though through travel on an arterial operates at level of service “B”, the turning movements for local access at intersecting streets will often operate at a lower level of service, as such turns are delayed longer waiting for a suitable gap in oncoming traffic. In addition, if the concept of “complete streets” is to be implemented in rural areas then a multimodal approach to level of service is needed. Most rural roads at present lack adequate shoulders or paved width to accommodate bicycles and pedestrians (active transportation) safely alongside vehicular traffic. That may still be acceptable on low-volume rural roads, but today’s conditions call for more attention to the conflicts between active transportation and high volumes and high speeds of vehicular traffic.

A discussion of our rationale follows:

The additional sentences above provide a needed reference point to better preserve rural character. While we appreciate that the Level of Service standard for Rural Areas has been set high at LOS “B”, consistent with preserving rural character, we object that the standard is usually applied only to through travel and not to local access and mobility. This leads to under-accounting of traffic deficiencies that affect preservation of rural character. It also ignores multi-modal aspects, which will become mandatory following implementation of HB1181 within five years.

In particular, the technical methodology used for concurrency measures average travel speeds on arterials only. Disregarded is the delay experienced by turning movements between the arterials and any intersecting streets. Standard traffic engineering methodology for intersection analysis evaluates LOS for all such turning movements, but those movements are being ignored due to the arbitrary decision to rely on average arterial speed for the concurrency methodology. Many rural residents experience extreme delays entering or exiting their local access streets during the peak hours of arterial traffic, because there are too few gaps in the arterial traffic to support safe turns.

Furthermore, Appendices describe the “Minor Arterial” road classification as having a strong component of service to local access, making such roads more like Collector Arterials than Principal Arterials, and lending support to the idea of basing level of service standards on the local access function rather than on through travel. But the county treats Minor Arterials and Principal Arterials interchangeably by not recognizing any difference in capacity between those two classifications, and showing almost no differences in the County Road Standards.

This cannot be seen as full compliance with GMA requirements. That is why we recommend a revision of the Level of Service policy and standards to enforce Level of Service “B” for local access movements in rural areas, and a broadening of the definition of level of service to include all modes.

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p. 8-20:

Policy T-215

In the unincorporated urban areas, we suggest **“D”** (not **“E”**), as LOS E amounts to capitulation to extreme congestion instead of supporting local access and mobility.

Policies T-216, T-217, and T-216

We recommend a simplification to apply the same LOS (again, we prefer “D”) to all the designated urban and quasi-urban areas now given different LOS ratings. The distinctions among these subtly different types of quasi-urban land use are just too complex with little benefit.

Revising the application of level of service standards as we propose will no doubt lead to the finding of more deficiencies, while the county is hard-pressed to fund improvements of any kind. But the finding of more deficiencies would support arguments to seek state highway funding for arterials through the rural area. It would support negotiation for impact mitigation from new developments and from adjacent cities contributing travel volumes to rural arterials. It would also encourage the planning of corridor improvements that support local access turns rather than through capacity (turn pockets, roundabouts, etc.). Existing LOS practices only sweep these issues under the rug and preventing proper planning that could help preserve the rural character.

Revising the level of service standards will also not harm the prospects for construction of a single home on a single lot in rural areas, because the concurrency ordinance exempts such small developments (in fact all small plats up to nine dwelling units are exempt). The owner of a single lot still can build a home on their land without fear of concurrency.

In our view, there is nothing to lose and much to gain by applying the level of service standards more stringently on behalf of local access and mobility, to further support the rural character.

G. Concurrency

We object not to the policy *per se* but to the manner of measurement as defined in the concurrency ordinance. The concept is good to measure average arterial speed within designated travel sheds. But the ordinance details that travel speeds are averaged for both directions of travel rather than just the more congested peak direction of travel. Such two-way averaging is not consistent with any other engineering method for level of service. Most methods focus on the most congested movements alone. By averaging peak direction and off-peak direction travel speeds, many arterials that are well-known for congestion appear to be in compliance with the LOS standard. This does not serve anyone well. It blunts to nothingness the very tool GMA prescribed to address congestion issues, and

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thwarts the county's ability to negotiate any kind of multi-modal mitigation from other jurisdictions for their impacts on county roads.

We recommend changing the concurrency methodology three ways:

- Revise through travel speed criteria (to higher speeds) that are associated with the level of service as applied to local access rather than through movements
- Measure through travel speeds only in the direction of peak travel; i.e., the slower of two directions
- Limit the arterials measured in each travel shed area to the "worst case" facility(ies), rather than all arterials.

p. 8-24:

I. Active Transportation Program

Policy **T-230**. Once again, delete the phrase "**to the extent feasible given available funding,**" then replace it with "**consistent with the philosophy of Complete Streets.**"

p. 8-27:

Policy **T-244**. At top of this page, delete the phrase "**as financial resources allow.**"

p. 8-29:

Policy **T-253a** (grammatical/symbolism comment). Update the wording of this policy to match the style of other policies dealing with equity.

III. Ensuring Effective Management and Efficient Operations

p. 8-31:

B. Road Services Policies and Priorities

The first paragraph of this section references the fiscal issue but gives the false impression that *all is well* with the Roads Program. The looming financial catastrophe that is spelled out in the details of the **Strategic Plan** and the **Transportation Needs Report** is *soft-pedaled* here with unduly weak language such as "*if sufficient revenue is not available then....*" Replace that sentence with:

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As identified in the Transportation Needs Report, under current law and funding sources only 12% of the projected 20-year needs of this plan are assured. If new revenue sources are not found, then by 2029 all capital investment will cease and thereafter the maintenance and operating programs will shrink as well (Appendix C1 page 45). Strategies to address this fiscal shortfall are discussed in Section IV of this chapter.

p. 8-32:

First new paragraph beginning “*While new streets...*” gives a rosy impression that the County will make much needed improvements when the fiscal reality is that no funds exist to do such things. A more balanced presentation requires the following changes.

Replace the first half of the second sentence (“*Over time.....the County strives*”) with: *The goal of upgrading roads is*. Keep the remainder of the second sentence (“*to improve....redundant measures.*”). Add thereafter this new sentence:

Upgrading this aging road network to current standards meeting the needs of all modes of travel will take many years. Without new resources almost nothing can be done. Within available resources the Roads Division will follow the priorities of the Strategic Plan and make such upgrades only where safety and preservation needs are highest.

Keep the last sentence about shared responsibilities. Add this new sentence right after it.

For its part, the Roads Division will monitor safety conditions continually and close any road or bridge that cannot be maintained in safe condition according to adopted standards and constrained by available funding.

Next paragraph describes arterial classifications.

A discussion of our rationale follows:

The current classification scheme contains a number of changes from lower to higher classifications that were adopted in 2018 based on the Regional Transportation System Initiative report. The avowed purpose of that report was to address regional system capacity deficiencies. That study was under the auspices of the PSRC with participation of all four member counties; however, nearly all changes were made in King County at the county’s sole request. The result was heavily biased toward using county rural roads to carry through traffic, regardless of adverse consequences on rural residents for whom those roads are their local access system. It blurs the distinction between Principal Arterials and Minor Arterials, to the detriment of preserving local access to rural areas. In hindsight a better outcome would have been to endorse upgrading state highways to carry the forecast burdens of future traffic growth between cities and through rural areas. Five years later, it is time to reverse some of those classification decisions in favor of the broader comprehensive plan and

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GMA goal of preserving rural character. This is also a compelling need due to the fiscal crisis facing the county road program. Therefore, completely replace this paragraph with the following:

Arterial Functional Classifications are established in Appendix C of this plan. The adopted King County Road Design and Construction Standards establish how design details differ for each road classification. The Urban Growth Boundary provides the distinction between urban and rural roads. The current arterial classifications in unincorporated King County should be revised in order to elevate the primary GMA goal of preserving rural character against the growing adverse impact of through traffic between cities. Principal Arterial designations should be removed from roads that historically serve significant amounts of local access. Ideally the Principal Arterial designation would be limited to those few county roads that are main thoroughfares connecting cities and might arguably be part of the state highway system, such as roads designated elsewhere in this plan as Rural Regional Arterials. Minor Arterial designations should be removed from some roads that historically serve mostly local access. The adopted King County Road Design and Construction Standards should similarly be updated to emphasize the priority on local access for rural arterials and include design concepts that discourage unwelcome through movements. Particular emphasis should be on shifting the design standards for Minor Arterials closer to those of Collector Arterials and more distinct from Principal Arterials, in keeping with the established definition of Minor Arterials that emphasizes a balance of local access and through movements. Road standards should also be updated to acknowledge the multi-modal aspects of such initiatives as “traffic calming”, “complete streets”, “Target Zero” and “Safer Roads”. Revisions described should be completed within two years after the adoption of this plan.

Replace the first sentence of the next paragraph concerning Heritage Corridors with the following, to lend greater emphasis on preservation of these historic routes:

King County recognizes eight designated Historic Corridors where travelers can still experience a sense of the county’s rich transportation history. Management of the County’s road network should give priority to preserving the rural character and use of these roads.

p. 8-34:

Policy **T-306a** about decisions regarding road closures and abandonments should include this additional priority: ***“preservation of local access to adjacent property.”***

Policy **T-310** should be revised to read as follows, emphasizing the primary role of Principal Arterials as service to through travel, versus all other classifications accommodating local access to various degrees.

Principal Arterials are designated to carry high traffic volumes at high speeds and serve primarily long distance travel, much like state highways. Minor Arterials and Collector Arterials accommodate increasing levels of local access movements with lower volumes and lower speeds. To protect residential areas from the impacts of through traffic, King

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County should design and operate roads to direct through traffic away from roads serving the local access function, and toward Principal Arterials.

p. 8-35:

Policy **T-313** should add the following words after the word “*infrastructure*”:

...and consider concepts of the Washington State Traffic Safety Commission’s Target Zero initiative and the Federal Department of Transportation’s Safer Roads initiative, so as to...

Policy **T-315** should add the following clause to the end of the first sentence:

...and by the design of access to and traffic operations within these historic corridors so as to discourage through movements and direct such traffic to other arterials.

p. 8-37:

D. Climate Change, Air Quality, and the Environment

This provides a good discussion and good policies. The existential nature of responding to climate change cannot be overemphasized. But the ongoing conversion from petro fuels to electric battery power for vehicles will not dramatically alter the nature of travel itself. Thus the management of the county road system is not directly altered by climate change concerns. It remains true that any actions to reduce vehicle-miles traveled will have positive environmental benefits, and in fact such actions will be required for implementation of HB1181.

IV. Financing Services and Facilities that Meet Local and Regional Goals

B. Road-Related Funding Capabilities

p. 8-44:

Add to the end of the first paragraph (“*Regional Transportation System Initiative identified...*”) including the underlining of the paragraph:

That report emphasizing using the capacity of existing county arterials through the rural areas to serve through travel needs as the region grew, and blurred the distinction between Principal and Minor Arterials. That was in hindsight not consistent with the goal to preserve the rural character, as discussed elsewhere in this plan. Instead, the need to support through travel between cities

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should remain in the few corridors properly fitting the role of Principal Arterials - chiefly State Highways - and also emphasize transit and travel demand management strategies in those corridors.

After the third paragraph (“*Financial viability...*”) add this new paragraph:

In addition, a sober and realistic assessment should be undertaken and completed by December 2024 of what road closures and other changes will inevitably occur without new revenues. The Strategic Plan will be updated to include a prioritized list of specific actions at specific locations that will be taken, in four five-year increments, to manage the road system within the limits of current funding for the next 20 years.

D. Revenue Shortfall

p. 8-45:

Policy **T-405**, in the first sentence, change “*should consider*” to “*shall identify.*” At the end of this paragraph, add “*...and include a schedule for road and bridge closures and other service reductions based on the limitations of current funding.*”

p. 8-47:

Policy **T-501** Change to

“**King County shall advocate for regionally consistent financial strategies, coordination and partnership to address county-wide transportation issues, especially to protect the unincorporated area of King County from the adverse impacts of regional travel growth and to obtain new sources of road finance.**”

Policy **T-504**, add “*state agencies and*” in front of “*Puget Sound Regional Council.*” At the end add:

...and do not adversely impact the valuable and limited agricultural resources of the county’s Rural Area – especially the Enumclaw Plateau.

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9 - SERVICES, FACILITIES, AND UTILITIES

Theme

- Urban or urban-serving facilities should not be sited in the Rural Area.

Overall Comments

In general, we seek County Policies that are consistent with *not* siting urban or urban-serving facilities in the Rural Area. Such Policies would be consistent with those in **Chapter 3-RURAL AREA AND NATURAL RESOURCE LANDS**.

Specific Comments

II. Facilities and Services

p. 9-5:

B. Urban and Rural Services

- F-209a** *King County ((will)) shall provide or manage local services for unincorporated areas, which include but are not limited to:*
- a. ((Building)) development permits;*
 - b. District Court;*
 - c. Economic Development;*
 - d. Land use regulation;*
 - e. Law enforcement;*
 - f. Local parks;*
 - g. Roads;*
 - h. Rural Area and Natural Resource Lands management assistance; and*
 - i. Surface water management.*

Please note that item “c. *Economic Development*” is not a “service” to be provided. The County provides services to obtain development permits, business licenses and permits, etc. that are *part* of economic development.

J. Solid Waste

JOINT RURAL AREA TEAM COMMENTS

p. 9-31:

We recommend Policy F-270:

F-270 *King County should maximize the capacity and lifespan of the Cedar Hills Regional Landfill, subject to environmental constraints, relative costs to operate, ((stakeholder)) partner and public interests, and overall solid waste system optimization.*

be changed to:

F-270 *King County, in seeking greater transparency and trust, recognizes the equity imbalance associated with having the greater Maple Valley area receive all waste generated throughout the county. King County, as a steward of its own land and protector of public health, shall seek and plan for closure of the Cedar Hills Regional Landfill in as timely a manner as possible.*

The *current F-270* does not represent a policy to achieve closure of the Cedar Hills Regional Landfill. The County is in the business of representing its people, which involves taking care of its land as a resource and protecting its people's health. Further, a statement, such as "*maximize the capacity*" — What does that really mean? This philosophy has led the County to increase the landfill's height over the originally designated 800 ft. It also could allow push back on the 1000-ft buffer. In fact, the County continually has tried to move into that buffer. "*Capacity*" is defined by footprint and airspace—and it's all subject to engineering. The County could decide to build large retaining walls to increase the height and, thus capacity—this had been proposed at one time—and could be again. "*Maximizing the capacity*" is far too *open-ended* and, thus, should be removed from this Policy, as we have recommended above.

The County needs to give greater attention and focus to the issue of closure of the Cedar Hills Regional Landfill. In past *decades*, deadlines have been unmet and *promises not kept*. A firm plan of action needs to be put into place in the near future. This plan, or legal vehicle, must provide residents in the greater Maple Valley area with not only transparency, but with a sense of confidence toward King County governance.

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10 - ECONOMIC DEVELOPMENT

Theme

- The rural economy should not be endangered by allowing urban-serving businesses in the Rural Area.

Overall Comments

There are many instances where the County seems to be pushing “*rural economic development*” for the sake of rural economic development. We believe the County should follow the intent and the letter of the State’s Growth Management Act (GMA) and PSRC’s *VISION 2050* (our **highlighting** below).

WA—Chapter 36.70A RCW calls for:

Comprehensive plans—Mandatory elements—36.70A.070

(5) Rural element. Counties shall include a rural element including lands that are not designated for urban growth, agriculture, forest, or mineral resources. The following provisions shall apply to the rural element:

(b) Rural development. The rural element shall permit rural development, forestry, and agriculture in rural areas. The rural element shall provide for a variety of rural densities, uses, essential public facilities, and rural governmental services needed to serve the permitted densities and uses. To achieve a variety of rural densities and uses, counties may provide for clustering, density transfer, design guidelines, conservation easements, and other innovative techniques that will **accommodate appropriate rural economic advancement, densities, and uses that are not characterized by urban growth and that are consistent with rural character.**

(d) Limited areas of more intensive rural development. Subject to the requirements of this subsection and except as otherwise specifically provided in this subsection (5)(d), the rural element may allow for limited areas of more intensive rural development, **including necessary public facilities and public services to serve the limited area** follows:

(ii) **The intensification of development on lots containing, or new development of, small-scale recreational or tourist uses, including commercial facilities to serve those recreational or tourist uses, that rely on a rural location and setting,** but that do not include new residential development. A small-scale recreation or tourist use is not required to be principally designed to serve the existing and projected rural population. **Public services and public facilities shall be limited to those necessary to serve the recreation or tourist use and shall be provided in a manner that does not permit low-density sprawl;**

PSRC’s *VISION 2050* calls for:

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MPP-RGS-13 Plan for commercial, retail, and community services that serve rural residents to locate in neighboring cities and existing activity areas to **avoid the conversion of rural land into commercial uses.**

MPP-DP-37 **Ensure that development occurring in rural areas is rural in character and is focused into communities and activity areas.**

Throughout every document—GMA RCWs, VISION 2050, Countywide Planning Policies (CPPs), and the KCCP there is a strong *consistency* in requirements, goals, policies, language, etc. to “*conform with the rural character of the area,*” “*preserve rural character,*” “*consistent with rural character,*” etc.

Consequently, we strongly urge the County to follow its very good policies when considering expanding so-called “*rural economic development*” beyond its identified rural economic clusters: Agriculture, Equestrian, & Forestry.

Specific Comments

p. 10-6:

I. Overview

B. General Economic Development Policies

ED-102 ***The focus for significant economic growth ((will)) shall remain within the Urban Growth Area, concentrated in a network of regionally designated growth centers. while within the Rural Area and Natural Resource Lands, the focus ((will)) shall be on sustaining and enhancing prosperous and successful rural and resource-based businesses, as well as encouraging **innovation and** new businesses that support and are compatible with the rural economic clusters.***

We support these changes and wish to emphasize their implementation by County departments. New businesses in the Rural Area are to be “*compatible with the rural economic clusters.*” As identified in this chapter, these are: Agriculture, Equestrian, & Forestry. Consequently, the County should not allow such businesses as so-called “*Tasting Rooms,*” etc. in the Rural Area. We recommend adding the word “*innovation,*” as it is an important seed for new business development.

II. Business Development

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p. 10-8:

King County's targeted industry support also includes those identified in the Puget Sound Regional Council's Regional Economic Strategy, the Local Food Initiative, 30-Year Forest Plan, and the King County Rural Economic Strategies Plan.

What and where is the "King County Rural Economic Strategies Plan"? Our search turned up only old and out-of-date documents from 2009/2010.

p. 10-9:

- ED-201 King County shall partner with federal, state, and local governments, economic development organizations, schools, educational and research institutions and the private sector to foster ((an)) innovative and ((entrepreneurial environment and support programs and strategies that promote)) sustainable business development and job creation((-P)) programs that provide technical and financial assistance to businesses ((include, but are not limited to)) such as:**
- a. Financial, marketing, expansion, and general operations assistance for small businesses to help them become competitive in the private sector;**
 - b. Technological, efficiency, and managerial assessments to help manufacturers reduce costs and use smaller footprints for existing or expanded production; and**
 - c. Assessment and/or remediation of contaminated property (Brownfields) in order to continue or expand operations to help individual small businesses or jurisdictions impacted by Brownfields; :**
 - d. Assisting new businesses in identifying and acquiring surplus materials and abandoned property, including acquiring and moving and re-settling abandoned structures;**
 - e. Assisting new businesses in complying with state and county regulations, including area specific historical site considerations, SEPA, the Growth Management Act, and in cooperating with surrounding communities.**

We believe that engaging with communities and their needs and being resourceful with otherwise ignored resources, should encourage regional competitiveness, reduce waste and risk, and improve problem solving.

p. 10-10:

- ED-203 King County shall proactively support and participate in programs and strategies that help create, retain, expand, and attract businesses that export their products and services. Exports bring income into the county that increases the standard of living of residents.**

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We recommend adding the word “proactively” to convey that respondent County departments shall seek contact and contacts, be responsive and accountable in problem-solving activities, and create problem-solving tools (e.g., videos and publications), and offer collaborative human networking communication skills.

VI. The Rural Economy

pp. 10-20 thru 10-21:

ED-602 *King County should implement the Rural Economic Strategies Plan to guide future rural economic development and will modify and add strategies as needed to reflect the evolving nature of the rural economy, while protecting the traditional rural economic clusters.*

a.

b. King County recognizes the value of home-based business, recreation and tourism, and commercial and industrial clusters for their ability to provide job opportunities in the Rural Area and Natural Resource Lands, and help sustain the rural economic base. The county will continue to work with chambers of commerce and other organizations that support these rural businesses to help ensure the continued viability and economic health of new and existing businesses in these clusters.

As there are no “commercial and industrial clusters” in the Rural Area, we recommend such language be removed as follows:

b. King County recognizes the value of home-based business, recreation and tourism, ~~and commercial and industrial clusters~~ for their ability to provide job opportunities in the Rural Area and Natural Resource Lands, and help sustain the rural economic base. The county will continue to work with chambers of commerce and other organizations that support these rural businesses to help ensure the continued viability and economic health of new and existing businesses ~~in these clusters~~.

c. [Note: “c” is missing a period in the PRD.]

d.

e. King County is committed to ensuring that all economic development, including the provision of infrastructure, within the Rural Area and Natural Resource Lands shall be compatible with the surrounding rural character, be of an appropriate size and scale, and protect the natural environment.

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This “commitment” rings hollow as there literally is no money for the “provision of infrastructure” in the Rural Area. Consequently, we recommend the following changes:

e. King County is committed to ensuring that all economic development, including the provision of infrastructure, within the Rural Area and Natural Resource Lands shall be compatible with the surrounding rural character, be of an appropriate size and scale, and protect the natural environment.

f.

g. King County will explore opportunities to support agricultural tourism and value-added program(s) related to the production of food, flowers and specialty beverages (including beer, distilled beverages, and wine) in the county. Partnership venues should be educational and include information on the diversity of products available in the county and the importance of buying local, should seek to unify regional tourism efforts, and should encourage development of new markets for agricultural products and value-added goods.

We are wary of the phrase “agricultural tourism,” which is ill-defined with unknown ramifications for the Rural Area. Further, if a product is brought in from outside the County, to what “value-added programs” is item g. above referring?

h.

i.

j.

Please note we no comments on items a., c., d., h., i., and j.

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11 - COMMUNITY SERVICE AREA SUBAREA PLANNING

Overall Comments

We are pleased to see our previous requests to reduce the *overlap* between Community Service Area (CSA) Subarea Plans and KCCP Major Updates have been accepted and are proposed to be implemented as shown in the *Schedule of Community Service Area (CSA) Subarea Plans* table.

However, we do have a concern that some Subarea Plans are now pushed out as far as a 2038 adoption—15 years from now! We recommend that DLS-Permitting retain sufficient Planners (currently, we believe there only are two and they might even have other duties) to conduct subarea planning *simultaneously* for two CSAs. For example, subarea planning for the *Bear Creek/Sammamish CSA* and the *Southeast King County CSA* could be run simultaneously (e.g., 2028-2030), as could that for the *Four Creeks/Tiger Mountain CSA* and the *East Renton PAA* (e.g., 2029-2031)—representing a 5-yr change (i.e., sooner) for the latter.

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12 - IMPLEMENTATION, AMENDMENTS, & EVALUATION

Theme

- Implementation of many great policies and codes is inadequate regarding permitting, land use, code enforcement, and other issues impacting development and uses on Rural Area parcels.

Overall Comments

We have seen over the years many problems with *implementation* of County Policies and Code—we have touched upon this in our Comments herein on other Chapters as well. Although the County, in general, has strong Policies and Code language, all too often implementation has been wanting. Either through poor interpretation, spotty followthrough, poorly funded and not-prioritized enforcement, and myriad exceptions / special considerations, the County does not give justice to those Policies and Code in practice on the ground to serve its residents.

Specific Comments

IV.) Land Use Designations and Zoning Classifications ((and Codes))

p. 12-11:

In the **Land Use Designation Table** (note that it has no given title) the “**Comprehensive Plan Land Use Designation**” titled: “*Urban Growth Areas for City in the Rural Area*” retains a “**Zoning Classification**” of “*Urban Reserve—UR,*” even though the Comment in the RHG-sidebar states that the lands have been annexed by the City of North Bend. Consequently, are these “**Comprehensive Plan Land Use Designation**” and “**Zoning Classification**” needed anymore? In fact, why does the “**Zoning Classification**” of “*Urban Reserve—UR,*” even exist?

V.) IV. ((Other)) Implementing King County Codes

p. 12-12:

Why is the following *text* proposed to be removed and not replaced?

~~*Other development approvals include commercial or industrial construction permits. Review of land segregation, substantial development permits and other development proposals are key parts*~~

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of the development process for making sure facilities and services to support potential development are adequate and for evaluating environmental impacts.))

The process used to ensure facilities and services to support potential development are adequate and to evaluate environmental impacts is critical. Although the newly added paragraphs direct the reader to specific County Code Titles (i.e., “*Surface Water Management (K.C.C. Title 9), Water and Sewer Systems (K.C.C. Title 13), Roads and Bridges (K.C.C. Title 14), Building and Construction Standards (K.C.C. Title 16), Fire Code (K.C.C. Title 17), Land Segregation (K.C.C. Title 19A), Planning (K.C.C. Title 20), and Zoning (K.C.C. Title 21A)*”) that address various aspects of such a process, we find this process so important to helping to maintain the integrity and character of the Rural Area that it should remain and be discussed in Chapter 12.

p. 12-13:

As an example of the above discussion, we see far too many instances where the following Policy simply is ignored, especially related to road infrastructure, for which the County has *insufficient* funds to keep up with needed maintenance:

I-501 When needed infrastructure and facilities are not available in a timely manner, development approvals shall either be denied or divided into phases, or the project proponents should provide the needed facilities and infrastructure to address impacts directly attributable to their project, or as may be provided by the proponent on a voluntary basis.

We have never heard of the “*King County Zoning Atlas*” referenced in the following Policy (immediately above Policy **I-501**). It also does not appear when we search the County website.

((I-401)) I-500a The King County Zoning Code’s ((zone)) zoning classifications and development standards and the ((official zoning maps)) King County Zoning Atlas shall be consistent with the Comprehensive Plan ((and functional plans)).

p. 12-14:

We recommend the following changes to Policy **I-504**, as Code Enforcement cannot simply rely on complaints from the general public:

I-504 King County shall enforce its land use and environmental regulations by periodically assessing whether imposed permit conditions are being met and pursuing code enforcement complaints and by providing oversight during the process of site development on all sites for which it issues permits.

((VI.2016)) V. Comprehensive Plan ((Workplan)) Work Plan

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pp. 12-30 thru 12-32:

Action 1: Comprehensive Plan Performance Measures Framework Update.

As we described under our Comments in **Chapter 1-REGIONAL GROWTH MANAGEMENT PLANNING**, we fully support such an activity, but were not even aware it existed and produced a report in 2022! As we stated in Chapter 1, the items being measured should be reviewed *prior* to the next cycle described here.

Action 2: Comprehensive Plan Public Participation Code Update.

We support this effort. We have been pleased with the Public Participation Plan being followed during the 2024 KCCP Major Update. We have fully participated in that effort and will continue to do so.

~~(VII.))~~ **VI. Incentives**

p. 12-32:

I-601 ***King County should develop incentives for the Urban Growth Area that encourage the development industry to provide a broad range of housing and business space, including areas of the county with the most disparate outcomes in health, economic prosperity and housing conditions, where residents may be at high risk of displacement. Incentives could include:***

...
b. Consideration of demonstration projects:

What “*demonstration projects*” and where would they be suitable to be sited? Policy **I-601** describes incentives for the UGA, so we assume that such “*demonstration projects*” are not to be sited in the Rural Area. “*Demonstration project*” is not included in the **GLOSSARY**. We are concerned here because several past “*demonstration project*” proposals in the Rural Area were completely *incompatible* with existing zoning Code and KCCP Policies. We remain very, very worried here! We recommend the proposed addition of item **b.** above be deleted.

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Appendices

JOINT RURAL AREA TEAM COMMENTS

A - Capital Facilities and Utilities

[Appendix A - Capital Facilities and Utilities](#)

No comments.

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B - Housing Needs Assessment

[Appendix B - Housing Needs Assessment](#)

No comments.

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C - Transportation

Appendix C - Transportation

Overall Comments

To support the policy changes recommended in the body of Chapter 8, some supporting materials in Appendix C – Transportation need to be updated or expanded. We cannot provide the details of such technical work, but more attention is needed to the three topical areas of interest we suggested for Chapter 8:

- Needs of unincorporated areas are neglected
- City to city traffic uses rural roads excessively
- Financial system for county roads is broken

Some suggested adjustments follow:

Specific Comments

I. Requirements of the Transportation Element

pp. C-3 thru C-4:

- **Actions to Bring Facilities into Compliance**
More work needed here to implement recommendations re: Chapter 8.
- **State and Local Needs to Meet Current and Future Demands**
Clarify that funding needs have been identified but are NOT provided. Show the shortfall.
- **Intergovernmental Coordination**
The City of Black Diamond's lack of cooperation with the region is NOT accounted for.
- **Active (Nonmotorized) Transportation**
Add discussion of adequacy of service to such modes; add multi-modal level of service accounting for lack of shoulders on rural roads, add inventory of facilities throughout rural area not just designated trail system.

II. King County Arterial Functional Classification

p. C-4:

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The definition of Minor Arterials emphasizes the dual role of Minor Arterials with significant emphasis on local access, whereas in practice the county manages Minor Arterials effectively the same as Principal Arterials. We recommend to first establish a multi-modal level of service policy. Consider all progressive concepts such as traffic calming, Complete Streets, Target Zero, and Safer Roads. Based on that guidance, the *permissible* through volumes on Minor Arterials and Collector Arterials would logically be reduced to provide adequately for local access turning movements, and for support for all modes. Road design standards would be revised as well to account for various ways that rural character can be protected.

p. C-6 (map):

Preservation and protection of rural character demands reconsideration of this map. Some **Principal Arterials** should be *reclassified* as **Minor Arterials**, and some **Minor Arterials** should be *reclassified* as **Collector Arterials**.

III. Transportation Inventory

B. Air Transportation System

pp. C-7 thru C-8:

If GMA is to be followed, all of section **B. Air Transportation System** needs a more comprehensive accounting of all airports regardless of ownership, and some discussion of the issues pertaining to a possible new airport to augment SEATAC after it's capacity is reached. See our Comments in Chapter 8 on same.

C. Marine Transportation System

p. C-8:

From a rural/unincorporated perspective, this system only applies to Vashon Island. The role of ferry service to that island is huge, and needs to be maintained on a par with intercity highways in the road system, but we have no specific comments.

It is curious that the ferry operations of several other agencies are inventoried, but the same level of detail was not provided under Air Transportation.

D. Land Transportation System

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pp. D-12 thru D-24:

This impressively long section accounts for all the forms of land transportation one could imagine, but without any discussion of system performance, current conditions, adequacy, deficiency, and thus no basis for establishing future needs as GMA requires. Although information is found in **Appendix C-1**, more should be provided here in summary tables and analysis, such as the following that we recommend:

- Road miles on each class of road, by community service area
- Vehicle-Miles of Travel on each class of road, by community service area
- Average volume on each class of road, by community service area
- Population of each community service area
- Vehicle-miles per capita for each road class, by community service area
- For comparison provide same statistics on each class of road, statewide, countywide, and urban growth area of King County. Source: WSDOT annual HPMS reports. These comparisons will show that King County is unique among Washington counties. Rural/unincorporated roads here serve about three times the volumes found on similar arterials anywhere else. These tables will help direct future program priorities toward performance needs based on preservation of rural areas, more so than the current management system oriented to asset management, and support the search for new funding sources.
- Inventory driveways, intersections, curb cuts per mile on each classified road, at least for those with volumes above 5,000 per day.
- Inventory locations with limited sight distance increasing risks for active transportation, at least for those with volumes above 5,000 per day.

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C1 - Transportation Needs Report

[Appendix C1 - Transportation Needs Report](#)

Overall Comments

This provides an impressive inventory of roads and projected needs, but the approach is always countywide and does not suggest timing for any of the “needs” listed. The list simply accounts for (almost) all the miles of road under county control, and assigns various types of improvement to each road for an ultimate future condition. This foundational list needs some discussion of when or why each improvement will be needed.

To support the deficiency analysis we recommended in Chapter 8 (for the broken financial system for roads), the inventory of conditions should provide summary tables of the road system according to such key measures as functional classification, lanes, traffic volumes, shoulder width and other measures of support for active transportation, transit, and pavement condition. Summarize issues with findings like *“X percent of Minor Arterial miles lack shoulders wide enough for pedestrians.”* A summary table should be presented for each community service area, and countywide, all based on the future horizon year (PSRC’s *VISION 2050*).

Such a methodology also would support the hard decisions needed to justify future road closures due to lack of funding.

Specific Comments

Chapter 1. Planning Context and Introduction

pp. C1-4 thru C1-12:

This chapter introduces and to some extent summarizes the following chapters. It should be updated as following chapters are revised.

Chapter 2. Unincorporated King County Road and Bridge Assets

pp. C1-12 thru C1-36:

The entire scope of this chapter is geared to asset management, rather than system performance. While asset management is import and directly related to the fiscal crisis before the county, GMA requires a discussion of system performance.

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We suggest an additional section to be called “*2.7 Multi-Modal Level-of-Service Standards and Deficiencies*” that will provide the data we requested in the discussion of Chapter 8. This would include an inventory of roads with shoulders suitable for active transportation (or not), segregated by functional classification, traffic volumes, sight distances and other factors related to safety of pedestrians and bicyclists in particular, indicators of pedestrian and bicycle activity, and other factors related to a future multi-modal level of service measuring a system for how it meets rural needs, more than how it serves through travel.

The following presents a discussion of our rationale:

The goal is to establish a baseline of current conditions so as to monitor future changes and prioritize future actions to mitigate the impacts of growth. For the purposes of this report, such data could be summarized into tables that quantify the number of road-miles meeting various criteria, by class of road, by community service area, etc. Future conditions could be similarly summarized.

Obviously many county roads do not meet current road design standards, and those standards generally don't distinguish between urban and rural environments. Rural residents generally oppose sidewalks and other urban features, but do use their roads to walk and bicycle. Managing rural roads for multiple user groups is the issue, one that is addressed by “complete streets” philosophy. We anticipate that an improved level of service methodology would take into account that for low-volume roads missing or narrow shoulders are OK, but for high volume roads that is not OK. Higher volume roads in rural areas have transitioned from their historic rural character into a quasi-urban nature that demands some adjustment of standards.

This change from rural to urban is confronted in some suburban cities by a level of service approach that measures suitability for active transportation by the width of shoulders, and relates that to traffic volumes. With very low volumes (say under 1,000 daily vehicles) no shoulders would be necessary – such as in suburban neighborhoods. As traffic volumes rise, shoulder requirements should increase in increments: 2 feet, 4 feet, 6 feet, 8 feet. One side or both sides of the road also matters.

That approach should be further modified to increase the need for shoulder treatments on road segments where curves and hillcrests limit sight distance. A useful reference value might be the sight distance requirements already established in road design manuals for safety of vehicular turning movements. Or just say 500 feet for simplicity. Traffic speed may be another adjustment factor, raising the need for active transportation support as prevailing speeds increase. Just measuring these conditions could lead to revising traffic management and road design practices in favor of support for active transportation.

The matter of what through traffic volumes are acceptable for preserving rural character can also be codified into level of service standards. Standard traffic engineering methodology applied to any two-lane road intersection with stop control on the side streets is all that is needed to identify the maximum through traffic volume that is acceptable if the turning movements to and from the connecting local street are at level of service “B”, the county's adopted rural standard. Upholding that standard at the level of local access turning movements would be a powerful support for preserving

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rural character. For reference, note that the county recognizes as Rural Regional Arterials four specific routes that have daily volumes from 16,000 to 20,000, all on two-lane roads. Such high volumes are clearly a violation of rural character, and we advocate elsewhere that those arterials be transferred to state ownership as state highways. Roads compatible with rural character should probably have no more than 5,000 to 10,000 daily vehicles – assuming that active transportation is properly served. Absent safe treatment of active transportation, those volumes should be reduced.

We envision an improved Transportation Needs Report that would show an inventory of road-miles by level of service, in each community service area, for existing conditions and future conditions. A policy should establish what amount of deficiency is acceptable in each category. That would be a more useful approach to concurrency management for unincorporated areas (separating rural and urban parts too) than the existing system that only measures the speed of through traffic. It would establish a basis for separating existing deficiencies from future deficiencies due to growth, which could be mitigated by a regionally uniform impact fee on new developments anywhere in the county, such that developments in outlying cities would contribute toward their impacts in rural areas too. That is the power of a regional impact fee based on VMT, with proceeds directed wherever the VMT occur.

Chapter 3 Transportation Modeling

pp. C1-36 thru C1-37:

PSRC's regional traffic model has been used to identify future traffic volumes based on adopted growth targets. This information should be presented in some form in the TNR. Traffic volume maps are customarily used in comprehensive plans to document existing and future conditions. Volume growth trends are a useful tool for scheduling growth-related future improvements, at least in five-year increments over 20 years. We anticipate that in rural areas, only roads with volumes higher than perhaps 5,000 daily vehicles need to be so documented.

There is a need to also address violations of the adopted growth targets, specifically Black Diamond's refusal to abide by regional protocols. The current approach fails to address the worst case now before the region. That city's comprehensive plan anticipates well over 6,000 new dwelling units versus the region's target allocation of 2,900 units, and master planned development agreements to that effect are now being implemented with over 1,000 units already on the ground. Traffic impacts on county roads to/from Black Diamond are already in evidence, but under current law there is no way to prevent continuation of this trend. A start would be to run the PSRC traffic model with those additional impacts so as to document the extent of traffic impacts.

The PSRC model has all the elements needed to quantify regional traffic impacts on the basis of VMT for any development anywhere. Such a powerful tool deserves to be used to fairly allocate regional funds of any kind to where VMT impacts occur, and do so across all jurisdictional boundaries. King County's financial dilemma would benefit greatly from such a system, but all jurisdictions would derive some benefit.

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Chapter 4 Drivers of Change Affecting Transportation in Unincorporated King County

pp. C1-37 thru C1-41:

This section contains much useful information, but could provide much more by carrying out the thoughts expressed above with application to future year projections. This is what GMA anticipates. We are especially alarmed by the information on pages 38: “*congestion-related delay is expected to increase most significantly for urban unincorporated and rural areas*” and “*annual delay per capita in urban unincorporated areas is expected to increase to 53 minutes (a 20 percent increase) and to 63 minutes in rural areas (a 26 percent increase).*” These trends are quite the opposite of what a balanced GMA plan would entail, and especially far from preserving rural character. On page 40 (top) it is reported that “Since 2006, less than 3 percent of new housing in King County has occurred in the rural area.” Clearly, congestion in rural areas is an impact of city-to-city travel through the rural area, and not due to growth within the rural area. As the rest of page 40 makes clear, this growth is occurring without commensurate financial resources to offset the impacts. Something must change.

This section concludes with a bland statement that “*King County Roads will continue to...achieve scaled-up, regional funding solutions.*” This is not enough, neither to obtain solutions when nobody else has wanted to meet the challenge for the last several years that Roads has been documenting its fiscal plight, nor to satisfy GMA which calls for a demonstration of a fiscally balanced solution within the Comprehensive Plan. We call for satisfying GMA by demonstrating *tangibly* in the Comprehensive Plan what Roads will do in coming years to operate within its existing financial means. See Chapter 5.

Chapter 5. TNR Project Needs and Cost Analysis

pp. C1-41 thru C1-43:

Taking the TNR at its word, even without changing the scope of project needs to address additional needs we have highlighted before, the table on pages 43-44 gives an estimated cost to meet all needs of \$2.5 BILLION dollars, over 20 years, whereas the available revenues under current law are given as only \$288 million dollars, and over two-thirds of that amount is grant funds from other sources. We will trust that estimate of grant funds is somehow reasonable and not a dream. Even so, only 12% of TNR needs will be funded in 20 years. This is not just broken, it is a catastrophe. The character of the rural area will not be preserved, it will not be maintained, it will be destroyed by such a shortfall which is born only by rural residents, not urban dwellers. The needs of through travelers will not be met either.

We recommend that a new chapter be added to this appendix, detailing how King County Roads will act to operate within its means, in five year increments from 2024 to 2044.

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We expect to see a list of roads or road segments that will be shut down, bridges that will be closed, paved road not maintained and allowed to “return to gravel” as we have heard said in many public forums for several years. Other services will be reduced or terminated. Standards will not be met. These realities need to be put forth in plain language.

The simplest thing to do going forward is to stop using rural roads as surrogates for a deficient state highway system. Strategically disconnecting a few county roads will push a number of through trips back onto state highways (and the four Rural Regional Arterials) where they belong with modest impact on rural residents.

That will turn this issue into a state funding problem so the legislature can deal with it. Three examples suffice to demonstrate this point:

- (a) Four Rural Regional Arterials alone account for over \$500 million in construction costs in the TNR. Converting these roads to state highways and state funding would remove almost 20% of the TNR cost estimate.
- (b) In Northeast King County, commuters out of Snohomish County have discovered a path around congestion on SR 203 between Monroe and Duvall, by taking a path through bucolic farmlands to cross the Snoqualmie River at High Bridge and then turn southward on West Snoqualmie Valley Road to the Woodinville Duvall Road (a Rural Regional Arterial). This West Snoqualmie Valley Road is very antiquated and very physically deficient. It serves historically as local access for local farms – not through travel. It is at risk for slides as it follows the steeply sloping west wall of the valley. High commuter volumes are impactful to the farms along that road, and the road will need reconstruction much sooner. The TNR lists two slide-control projects on this road costing several million dollars. The rising use of this road by inter-county commuters will soon dictate total reconstruction of this road, a cost not yet found in the TNR.

Truncating the West Snoqualmie Valley Road anywhere south of the High Bridge (the county line would be poetic) would bring that future problem into immediate focus to the commuters, who would be forced back onto state highways to reach their urban King County destinations. They can choose between SR203 through Duvall, and SR 522 out of Monroe. This regional-scale problem will then be impacting regional-scale facilities, not King County’s antiquated rural roads. It would also preserve the road much longer for service to local residents, most of whom would not be inconvenienced by the loss of access northward.

- (c) In Southeast King County, commuters from Bonney Lake, Buckley, Enumclaw, and Black Diamond who commute north via SR 169 currently bypass Maple Valley in considerable numbers through rural Ravensdale and Hobart and continue northward into Issaquah. They take several paths to Ravensdale then head north via Landsburg Road across the Cedar River to 276th Avenue SE which turns into Issaquah Hobart Road at SR 18. Dramatic real-world proof exists that most of that traffic through rural Hobart on 276th can and should be using SR 169.

In August of 2019, King County Roads reconstructed the bridge decking on Landsburg Road

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over the Cedar River, closing that route for two weeks. The result was a $\frac{3}{4}$ decrease in traffic through Hobart, and traffic chaos in Maple Valley that made the TV news! If that bridge had been simply decommissioned instead of retrofitted, the result would have been (a) minimal impact on rural residents in the area, and (b) a much longer lifecycle for maintenance of Landsburg Road and 276th Avenue SE, not to mention the routes to Ravensdale out of Enumclaw through Cumberland and Lake Retreat, and out of Black Diamond via Ravensdale-Black Diamond Road. Those roads represent over 20 miles of county roads that could be preserved for rural access use for a much longer time, not to mention preserving the tranquility of abutting residences as well. Construction projects in the TNR on those road segments total \$78 million that could be avoided or postponed.

These three examples alone address almost one-fourth of the total TNR 20-year cost as it stands. Similar analysis of other routes should lead to additional savings for King County even if less dramatic.

The next thing to be done is to show concretely how King County will manage its road system on a budget of \$288 million over 20 years, with no new revenues. Show what projects will be undertaken, in 5-year increments, and show what will be consequences of not doing all the rest of the TNR's long list of needs. State what roads will be closed or reduced to gravel, what bridges will be closed, what services will not be provided. Once that information is made public, reaction by elected officials at state and regional levels is much more likely to follow.

We recommend adding a new section on **Haul Roads**. The comprehensive plan should also discuss haul roads and the problems associated with same. Several county arterials are severely impacted by heavily loaded trucks coming from quarries, logging operations, and other resource extraction activities which are common in the rural area. The county's current methodology for determining haul road fees and assigning fees to operators through the permitting process is grossly inadequate to provide adequate compensation for the damage done to roads by heavily loaded trucks, some carrying up to 100,000 pounds gross weight. (For comparison cars and light duty trucks usually carry under 10,000 pounds fully loaded.) The fee methodology is based on vehicles, not weight, and thus grossly understates the damage due to heavy trucks. Truck monitoring and collection of fees is apparently haphazard for years after the initial start of operations. A simpler, more effective system is needed. A start would be to have an inventory of roads affected, the volumes of heavy trucks involved now and in the future, and analysis of alternative tax and fee systems.

JOINT RURAL AREA TEAM COMMENTS

C2 - Regional Trail Needs Report

[Appendix C2 - Regional Trail Needs Report](#)

We offer only improvements to an excellent *King County Regional Trails System* by listing connections most needed to make the system more accessible, safe, usable and equitable:

- Connecting the **Snoqualmie Valley Trail to Snohomish County's Centennial Trail**, a rural regional trail from Snohomish north into Skagit County, this giving commuters and tourists an active alternative to increasingly busy north-south interstate and road corridors.
- Better connection of the **Snoqualmie Valley Trail to the statewide Palouse to Cascades Trail/Mountains to Sound Greenway**, which is part of the National Recreational Trail System. This will also provide a better Northern Route for the Cross State Trail program being developed.
- Take the **Foothills Trail**, soon to connect to Pierce County's part of the Foothills Trail, north to connect to the **Cedar River Trail** at Landsburg/Maple Valley. This new northern section of King County's Foothills Trail is one of the last sections needed to complete the route for the Southern Route for the Cross State Trail program. Ideally, this route would extend along the upper Cedar River – through the Seattle Public Utilities' Cedar River Watershed. We need King County's help to advocate for a route through the Watershed, as it is the best and only viable way to route a pedestrian, bicycle trail from the southeast of the state to the Palouse to Cascades Trail/Mountains to Sound Greenway/I-90 corridor.
- Now with restrictions on the number vehicles allowed into Mount Rainier National Park (MRNP) each day, there is a greater need for a multi-use trail to connect MRNP with King County (where most visitors to the Park originate) via the **SR-410/White River Corridor**. Such a trail would allow active transportation options for county residents and visitors to reach the SE highlands of King County and MRNP. Research is needed to determine if the Weyerhaeuser Mainline logging road that runs parallel to SR410 for most of the 17 miles between Enumclaw and the county line/Greenwater can be repurposed as a trail. Tourism is an important and growing part of the local economy of SE King County, and this will help to make that more sustainable, increase road safety, and reduce the need for investments in additional road infrastructure.

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D - Growth Targets and the Urban Growth Area

[Appendix D - Growth Targets and the Urban Growth Area](#)

Theme

- Unfortunately Growth Targets cannot be enforced to keep *irresponsible* cities, such as Black Diamond, from grossly overgrowing and directly impacting County roads and rural residents.

Specific Comments

p. D-10:

Figure 5: King County Jurisdiction Growth Targets 2019-2044

We understand the numbers in *Figure 5* were adopted in the 2021 CPPs—and we offered detailed written comments at the time. However, we again want to point out the coming “*train wreck*” that primarily County roads will face that will impose additional burdens on the Roads program funded primarily by Rural Area taxpayers. The City of Black Diamond, a designated “*City in the Rural Area*,” has been allocated a 2019-2044 Housing Target of 2,900, which its already approved permits will *grossly* exceed. It also has other permit applications under consideration, that when approved, will make this even worse.

To make matters worse, the City of Black Diamond has been allocated a 2019-2044 Job Target of *only* 690, meaning that the vast majority of its 20,000+ new residents will commute on County roads to their jobs in the major cities, as they avoid the much congested SR-169, which the City is barely improving, except for the addition of some left-turn lanes and two potential roundabouts. This all amounts to a recipe for disaster, especially for Rural Area residents/commuters! All other cities listed are handling their Growth Targets in a professional and civil manner, leaving Black Diamond as an *irresponsible* city that is knowingly overloading County roads and imposing an unfair and inequitable financial burden on the Rural Area taxpayers to mitigate the impacts its own policies and permit approvals are creating. The current system is badly flawed and, by ignoring those flaws, we perpetuate them *ad infinitum*.

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JOINT RURAL AREA TEAM COMMENTS

Snoqualmie Valley/NE King County Community Service Area Subarea Plan

Snoqualmie Valley/NE King County Community Service Area Subarea Plan

Comments are being submitted separately by our member Organizations within this CSA on their Subarea Plan's PRD.

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Vashon-Maury Island Community Service Area Subarea Plan Amendments

[Vashon-Maury Island Community Service Area Subarea Plan Amendments](#)

One of our Joint Team organizations, the *Vashon-Maury Island Community Council (V-MCC)*, due to limitations in its By-Law, is unable to complete its review of the PRD in time to meet the July 15 deadline and, hence, we have no comments here at this time. We have encouraged the *V-MCC* to submit its comments when ready and fully approved.

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Land Use and Zoning Map Amendments
Land Use and Zoning Map Amendments

No comments.

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JOINT RURAL AREA TEAM COMMENTS

Proposed Ordinance with King County Code Amendments

Proposed Ordinance with King County Code Amendments

Theme

- Changes to Code are needed, e.g., Special-Use Permits (SUPs), Temporary-Use Permits (TUPs), Conditional-Use Permits (CUPs), etc., must be focussed and limited; while permit exceptions should be just that—exceptions for a very specific purpose meeting very specific, temporary, and non-recurring situations or conditions, not the rule.

Overall Comments

Although not Code specific, implementation continues to mar good Policy and Code. For example, the use of exception-based criteria to allow for a permit applicant's desire to circumvent the overall mandates of the KCCP needs to be severely curtailed (e.g., Special-Use Permits (SUPs), Temporary-Use Permits (TUPs), Conditional-Use Permits (CUPs), etc.). Historically, after an application has been found “*complete*,” the applicant has asked for and been granted exceptions to some of the parameters of the KCCP or KC Code. Exceptions should be just that—exceptions for a very specific purpose meeting very specific, temporary, and NON-recurring situations or conditions, not the rule. Additionally, upon granting of any exceptions that have become too routine, there has been little to no monitoring to ensure the conditions granted are enforced.

We are monitoring several **Titles** of the County Code to ascertain what changes will be proposed during the remainder of the *2024 KCCP Major Update* process, either by the Executive’s Office or the Council, following the PRD. These include, but are not limited to:

1. Manufacturing and regional land uses allowed on industrial-zoned parcels embodied in: **Title 21A.08.080 Manufacturing land uses** and **Title 21A.08.100 Regional land uses**.
2. Rural economic development embodied in: **Title 21A.08.040 Recreational/cultural land uses** and **Title 21A.08.070 Retail land uses**.
3. Zoning in Rural Neighborhood Commercial Centers and Mixed-Uses. We originally requested changes in August 29, 2017, but although the Council agrees, it has not gotten around to them:

21A.04.090 Neighborhood business zone.

A. ...

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

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21A.04.100 Community business zone.

A. ...

2. Allowing for mixed use (housing and retail/service) developments in urban areas and in Rural Towns; and

4. We continue to work with DLS-Permitting on potential **Title 23 CODE COMPLIANCE** changes.

Specific Comments

We understand our earlier recommendations for County Code **Titles 21A.30.085 Home occupations and 21A.30.090 Home industry** [Title 21A.30 Changes](#); **Title 21A.08.030 Residential land uses** [Title 21A.08.030 Changes](#) (specifically, Bed & Breakfasts); and **Title 21A.32 GENERAL PROVISIONS - NONCONFORMANCE, TEMPORARY USES, AND RE-USE OF FACILITIES** [Title 21A.32 Changes](#) *initially* were not accepted and included in the PRD. We understand the rationale given for those decisions. However, the issues our recommended changes are intended to address will not go away and will continue to proliferate and cause problems. Consequently, we repeat them below and will continue work to enact such needed changes:

Title 21A.30.085 Home occupations and Title 21A.30.090 Home industry

Our proposed changes here were designed to put the "*Home*" back in *Home Occupation* and *Home Industry* activities. There are numerous cases of an entity buying or leasing a residential property and using it to site a commercial business, at which the owner/ operator does not live. Sometimes the house is rented to an employee to satisfy existing code. In some these cases, this appears to be an arrangement on paper only to satisfy the "*residents*" clause. Standards would need to be identified for what proof of residency is required to meet this condition.

Title 21A.08.030 Residential land uses

Our proposed change here was to ensure that permitted commercial uses remain *secondary* to the site's *primary* use as a residence by the business' owner/operator. Bed & Breakfasts (B&B's) are permitted in the RA zone under condition P9. We see an increasing trend where people set up businesses at sites where they do not live (in fact, in some cases, we see where residential use is abandoned altogether). We believe the existing code's intent is to allow for people to operate businesses at their place of residence, with limitations to achieve compatibility with Rural Area zoning and owner residency is intended to be a precondition for such uses in these zones. But we are seeing far too many exceptions to this original intent.

Title 21A.32 GENERAL PROVISIONS - NONCONFORMANCE, TEMPORARY USES, AND RE-USE OF FACILITIES

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Our proposed changes here sought to see if “*Events*” could be placed in a separate category such that those with a few events per year are allowed, but disallow those essentially run “*Event Centers*” in the RA and A zones as a business under a Temporary-Use Permit (TUP) which allows “*up to sixty days a year*”—that is not “*temporary*.” “*Temporary*” should be temporary, not 60 days per year (e.g., ~7 months of Saturdays and Sundays). Rather, “*temporary*” should be “*up to ten days a year,*” e.g., 5 Summer weekends on Saturdays and Sundays.

“*Businesses*” that hold events, such as weddings and family or group reunions, should not be granted a TUP, but rather should fall under **Title 21A.06.958 Recreation, active, as large-scale gatherings or social events**. In addition, **Title 21A.08.040 Recreational/cultural land uses** already allows certain activities in the Rural Area either outright or with a Conditional Use Permit (CUP). A CUP must be consistent with the King County Comprehensive Plan (KCCP) rules for the Rural Area and **Title 21A.44.040** criteria. Should CUPs be wanted, then there should be real conditions imposed and enforced.

Event Centers do not belong in the Rural Area. Granting TUPs for Event Centers in the Rural Area allows *special-interest commercialization* of the Rural Area. State and County laws that protect rural and resource lands must be upheld. County actions should be consistent with its own Code, Policies, and practice and protect rural and resource lands from illegal, special-interest, and unnecessary urban-use commercial development. Allowing Event Centers in the Rural Area essentially grants special privileges to the few, at the expense of the many: farm businesses, rural residents, the environment, and taxpayers. Such urban-serving businesses belong in the UGA, not the Rural Area.

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Supplemental Changes - Four-to-One Program

[Growth Management Planning Council \(GMPC\) Motion 23-3](#)

[Countywide Planning Policy Amendments](#)

[Comprehensive Plan Amendments](#)

[King County Code Amendments](#)

We fully participated in each of the bi-monthly GMPC Meetings that addressed these topics and offered both *Oral and Written Testimonies* throughout the process. We support the GMPC's May 2023 recommendations.

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Supporting Documents

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Area Zoning and Land Use Studies

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Black Diamond Urban Growth Area
[Black Diamond Urban Growth Area](#)

No comments.

Carnation Urban Growth Area Exchange
[Carnation Urban Growth Area Exchange](#)

Specific Comments

We understand this is a difficult issue. On the one hand the City of Carnation apparently does not support removing the site from its UGA or preserving it from urban uses without having land added to its UGA as a replacement. Such a “swap” would constitute a *UGA Exchange*.

However, we see no reason to create a *UGA Exchange* here, as the County already has robust, time-tested programs in place to handle such issues: *Four-to-One* and *Transfer of Development Rights (TDRs)*. For example, a TDR program could be explored within the City, where TDRs on the property in question could make something else within Carnation denser. This would appear to be a better solution than a *UGA Exchange*, where all proposed properties would have constraints. We support a solution that saves the agricultural use, but does not hurt the integrity of the adjacent Rural Area.

We would like to see this land protected and added to Tolt MacDonald Park that surrounds it on two sides and believe local citizens and the County want this as well, as it makes great sense. However, the idea of a *UGA Exchange* would need to be looked at carefully, as the devil would be in the details and it would need to be very limited as to where and how it might be used. In general, we do not support the concept of *UGA Exchanges* and are concerned about setting a precedent that could harm the integrity of the UGA elsewhere in the County.

Kent Pet Cemetery
[Kent Pet Cemetery](#)

No comments.

Maple Valley Industrial
[Maple Valley Industrial](#)

No comments.

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Reports

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Middle Housing Code Study

Middle Housing Code Study

Theme

- Multi-family housing should NOT be outright allowed in Rural Towns

Specific Comments

3. Recommendations

p. 21:

Recommendations Table, pp. 19 thru 23 (note, there is no title on the table)

Recommended Change 3. *“Remove CUP requirement and outright allow duplex, triplex and fourplex throughout the R-1 to R-48 zones (including Rural Towns), with restrictions for the R-1 zone to match current regulations”*

Rural Towns should not be viewed as part of the answer to affordable, middle housing. In general, Rural Towns lack transit, jobs, and do not historically include multi-family, middle housing in their character. Seeking to greatly increase population and housing in Rural Towns is not a viable solution to King County's housing needs, nor should any such proposal be entertained.

Further, this proposal to *“Remove CUP requirement and outright allow duplex, triplex, and fourplex...in Rural Towns”* is in conflict with the following four Policies documented in **Chapter 3, RURAL AREAS AND NATURAL RESOURCE LANDS:**

- R-301:** **King County should use all appropriate tools at its disposal to limit growth in the Rural Area and Natural Resource Lands, such as land use designations, development regulations, level of service standards and incentives, to:**
- a. Retain ((A)) a low growth rate ((is desirable for the Rural Area , including Rural Towns and Rural Neighborhood Commercial Centers, to)),***
 - b. ((e))Comply with the State Growth Management Act,***
 - c. ((e))Continue preventing sprawl and the overburdening of rural services,***
 - d. ((f))Reduce the need for capital expenditures for rural roads,***
 - e. ((m))Maintain rural character,***
 - f. ((p))Protect the environment, and***

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- g. ~~((f))Reduce ((transportation-related)) greenhouse gas emissions. ((All possible tools may be used to limit growth in the Rural Area. Appropriate tools include land use designations, development regulations, level of service standards and incentives.))~~**

A low growth rate for Rural Towns does NOT include expanding multi-family housing. Further, such action would overburden rural services, NOT maintain rural character, and would only increase transportation-related greenhouse gases as new residents commute to far-away urban jobs.

- R-302 Residential development in the Rural Area should only occur ((as follows)): a. In Rural Towns at a variety of densities and housing types, compatible with maintenance of historic resources and community character.**

"Compatible with community character" of Rural Towns does NOT include duplexes, triplexes, and fourplexes in Rural Towns, where very few, if any, such accommodations exist. Such housing is urban in nature and belongs almost exclusively inside the UGA.

- ~~((R-507)) R-503b Rural Towns serve as activity centers for the Rural Area and Natural Resource Lands and may be served by a range of utilities and services, and may include several or all of the following land uses, if supported by necessary utilities and other services and if scaled and designed to protect rural character:~~**
- a. Retail, commercial, and industrial uses to serve the surrounding Rural Area and Natural Resource Lands population;**
 - b. Residential development, including single-family housing on small lots as well as multifamily housing and mixed-use developments;**
 - c. Other retail, commercial, and industrial uses, such as resource industries, tourism, commercial recreation, and light industry; and**
 - d. Public facilities and services such as community services, parks, ~~((churches)) places of worship, schools, and fire stations.~~**

While **R-503b** does include multi-family housing in Rural Towns, this should only be on a very limited scale and only within the capacity of rural services, while maintaining the existing historic character of each Rural Town. The recommendation to "remove CUP requirement and outright allow" extensive multi-family housing in Rural Towns would completely change the character of these Towns and will be certain to create severe backlash from town residents (as has already occurred in Fall City with extensive single-family home development).

- R-506 Rural Towns may contain higher-density housing than permitted in the surrounding Rural Area, and should provide affordable and resource-worker housing if utilities and other services permit. Development density in Rural**

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Towns may approach that achieved in Cities in the Rural Area, when appropriate infrastructure is available.

The underlined proposed addition by County staff is very well placed and needed, as “*appropriate infrastructure*” includes roads, bridges, etc. and existing and even planned infrastructure do not support such increased densities, etc.

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JOINT RURAL AREA TEAM COMMENTS

Vashon P-Suffix Report

[Vashon P-Suffix Report](#)

One of our Joint Team organizations, the *Vashon-Maury Island Community Council (V-MCC)*, due to limitations in its By-Law, is unable to complete its review of the PRD in time to meet the July 15 deadline and, hence, we have no comments here at this time. We have encouraged the *V-MCC* to submit its comments when ready and fully approved.

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JOINT RURAL AREA TEAM COMMENTS

Vashon Affordable Housing Special District Overlay Report

[Vashon Affordable Housing Special District Overlay Report](#)

One of our Joint Team organizations, the *Vashon-Maury Island Community Council (V-MCC)*, due to limitations in its By-Law, is unable to complete its review of the PRD in time to meet the July 15 deadline and, hence, we have no comments here at this time. We have encouraged the *V-MCC* to submit its comments when ready and fully approved.

JOINT RURAL AREA TEAM COMMENTS

Glossary

Our explanation and rationale for recommended changes herein are given as **[COMMENT:....]**.

p. G-3:

Arterial Functional Classification

*Arterial functional classification is the division of a road system into a number of categories according to the function of each road. The degree to which the road serves movement of traffic or access to adjacent properties is the basis for its classification. Principal arterials provide for movement across large areas, serving predominantly “through traffic.” Minor arterials provide **access movement** to abutting properties, **local streets, and collector streets and to arterials** within large areas bound by principal arterials. Collector arterials serve smaller areas by “collecting” traffic to or from abutting properties **and local streets**, and funneling it to and from the **transportation** system **of minor and principal arterials**.*

[COMMENT: This better describes the functions of *Minor and Collector Arterials*.]

p. G-5 (this would be here, if added):

Commercial outside of centers

[COMMENT: Recommend this be *added* to the GLOSSARY—see our comments on this phrase under Rural Area geography (See also Rural Area Zoning) below.]

p. G-5:

Community Service Area Subarea Plan

*With King County's initiation of the subarea planning program, the new plans will be called Community Service Area Subarea Plans. These will apply the countywide goals of the Comprehensive Plan to smaller geographic areas. Each one of King County's six rural CSAs and each of the five large Potential Annexation Areas has or is scheduled to have its own CSA Subarea Plan. CSA Subarea Plans focus on land use issues in the smaller geographies, ~~((as well as community identified implementation activities))~~ while recognizing the parameters of County funding and revenue sources. These plans implement and are consistent with the Comprehensive Plan's policies ~~((and development regulations))~~ **and County Code**.*

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[COMMENT: Since “and development regulations” are proposed to be removed above, we recommend adding in “and County Code.”]

p. G-6:

Concurrency Management System

*The Growth Management Act requires jurisdictions to adopt and enforce ordinances that prohibit development approval if the development causes the level of service on a transportation facility to decline below the standards adopted in the comprehensive plan, unless transportation improvements or strategies to accommodate the impacts of development are made “concurrent” with the development. Concurrent with development means that transportation improvements or strategies are in place at the time of development or that financial commitment is made to complete the improvements or strategies within six years. The Concurrency Management System of King County establishes a process to manage new development **in the County’s Unincorporated Areas** based on transportation impacts on levels of service and the concurrency of needed improvements or actions. (See Chapter 8: Transportation).*

[COMMENT: The County only manages new development in the unincorporated areas.]

p. G-7:

Cumulative impacts

Cumulative impacts, for the purposes of the Shoreline Master Program, are the sum total of the current, plus any reasonably foreseeable future disturbances to ecological functions, which can be impacted by both development subject to shoreline permits and by development that is not subject to permits.

[COMMENT: Why *only* for the SMP?. “Cumulative impacts” are important in many other areas. For example, we have suggested the cumulative impacts of adjacent or nearby mining sites on road infrastructure, pollution, noise, etc. be assessed and addressed.]

pp. G-7 to G-8:

Development

For purposes of the shoreline master program, development means a use consisting of the construction or exterior alteration of structures; dredging; drilling; dumping; filling; removing sand, gravel, or minerals; bulkheading; driving of piling; placing of obstructions; or any project of a

JOINT RURAL AREA TEAM COMMENTS

permanent or temporary nature which interferes with the normal public use of the surface of the waters overlying lands subject to any state of water level.

[COMMENT: Again, why only for the SMP?. “Development” covers a broad category of impacts, mitigation, etc. It’s used throughout the Comprehensive Plan.]

p. G-10:

Feasible

Feasible means, for the purpose of ((this)) the Shoreline Master ((p))Program, that an action, such as a development project, mitigation, or preservation requirement, meets all of the following conditions:

- (a) The action can be accomplished with technologies and methods that have been used in the past in similar circumstances, or studies or tests have demonstrated in similar circumstances that such approaches are currently available and likely to achieve the intended results;*
- (b) The action provides a reasonable likelihood of achieving its intended purpose; and*
- (c) The action does not physically preclude achieving the project's primary intended legal use.*

In cases where these guidelines require certain actions unless they are infeasible, the burden of proving infeasibility is on the applicant. In determining an action's infeasibility, the reviewing agency may weigh the action's relative public costs and public benefits, considered in the short- and long-term time frames.

[COMMENT: Again, why only for the SMP?. “Feasible” could pertain to anything. It’s used throughout the Comprehensive Plan, e.g., at least a dozen times in Chapter 3 alone.]

pp. G-25 thru G-27:

Rural Area geography (See also Rural Area Zoning)

*The Growth Management Act requires that counties designate a Rural Area in order to conserve the rural character and quality of the existing rural lands in Washington. King County's Rural Area refers collectively to the geography that primarily contains the following land use categories – Rural Towns, Rural Neighborhood Commercial Centers, and Rural Area (RA-2.5, RA-5, RA-10 and RA-20) in unincorporated King County. The Rural Area geography also includes a limited amount of acreage with land use categories such as Industrial, **Commercial Outside of Center, etc.** The Rural Area geography does not include designated Natural Resource Lands, although resource activities occur on them. The Rural Area contains very low-density residential development, **very limited** commercial and industrial development, farms, forests, watersheds crucial for both fisheries and flood hazard management, mining areas and towns, historic sites and buildings, archaeological sites and regionally important recreation areas. (See Chapter 3: Rural Areas and Natural Resource Lands)*

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[COMMENT: We recommend “commercial outside of center” be removed, because County Code defines it as pertaining only to “urban areas”: per Title 21A.04.090 Neighborhood business zone. A. The purpose of the neighborhood business zone (NB) is to provide convenient daily retail and personal services for a limited service area and to minimize impacts of commercial activities on nearby properties and in urban areas on properties with the land use designation of commercial outside of center, to provide for limited residential development. These purposes are accomplished by:.... Also, we recommend adding “very limited” when describing “commercial and industrial development” in the Rural Area.]

Rural Area zoning

The Rural Area zone refers to the Rural Area 2.5, Rural Area 5, Rural Area 10 and Rural Area 20 zoning categories. This zoning is meant to provide an area-wide, long-term, rural character and to minimize land use conflicts with nearby agricultural, forest or mineral extraction production districts. These purposes are accomplished by: 1) limiting residential densities and permitted uses to those that are compatible with rural character and nearby resource production districts and are able to be adequately supported by rural service levels; 2) allowing small scale farming and forestry activities and tourism and recreation uses which can be supported by rural service levels and which are compatible with rural character; and 3) increasing required setbacks to minimize conflicts with adjacent agriculture, forest or mineral zones.

[COMMENT: The comma between “long term” and “rural character” should be removed, as it changes the meaning of that part of the definition.]

Rural Growth

Rural Growth refers to residential, commercial, and industrial growth that is scaled to be compatible with, and maintains the traditional character of the Rural Area. Rural growth typically does not require urban governmental services except in the case of some Rural Towns to protect the environment as provided in this Comprehensive Plan. ~~The basic elements of “Rural Character,” as defined by the King County Countywide Planning Policies, are natural features, resource-based industries, rural towns, rural neighborhoods, rural infrastructure and services, open space system, rural housing, rural economy, and Cities in the Rural Area.~~

[COMMENT: The CPPs only mention “rural character” in Development Policies (DPs) 47 and 48 and in two policies (DP-52 and PF-21) related to the School Siting Task Force. In none of those policies do the CPPs mention any of the items listed above. We recommend the last sentence be removed as the Glossary already defines “Rural Character” from the Growth Management Act definition.

p. G-31:

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Transportation Facilities and Services

Transportation facilities ~~and services~~ are the physical assets of the transportation system that are used to provide mobility. They include roads, sidewalks, bike lanes and other facilities supporting ~~((nonmotorized travel))~~ active transportation, transit, bridges, traffic signals, ramps, buses, bus garages, park and ride lots and passenger shelters. Transportation services are programs and activities to maintain the transportation system and provide information and assistance to citizens about use of the transportation system.

[COMMENT: “Transportation Services” are distinct from “Transportation Facilities” and, thus, need to be described separately.”

Transportation Needs Report ((TNR))

The ~~((TNR))~~ Transportation Needs Report is a comprehensive list of ~~((recommended-c))~~ County road system transportation needs ~~((through the year 2022 needed))~~ to ~~implement~~ serve the mobility needs of the land use element. ~~It includes transportation needs for the unincorporated King County road network((, and some city, state, and adjacent county projects)).~~ It does not include transit service, city and state needs, or capital needs for such related things as maintenance buildings. (See Chapter 8: Transportation and Appendix C1)

[COMMENT: If our recommendations above are accepted, this definition would read as follows:

Transportation Needs Report

The Transportation Needs Report is a comprehensive list of County road system needs to serve the mobility needs of the land use element. It does not include transit service, city and state needs, or capital needs for such related things as maintenance buildings. (See Chapter 8: Transportation and Appendix C1)]

JOINT RURAL AREA TEAM COMMENTS

Errata

Please note the compilation below is nowhere near complete.

p. 1-6, THIS IS NOT A SENTENCE:

~~“The ((Growth Management Planning Council is the)) formal body charged with developing the Countywide Planning Policies ((and then sending a recommendation to the King County Council for its review and approval. The Growth Management Planning Council)), which is a representative body consisting of elected officials from King County, Seattle, Bellevue, the Sound Cities Association, and ((the City of Bellevue)) special purpose districts.”~~

“The formal body charged with developing the Countywide Planning Policies, which is a representative body consisting of elected officials from King County, Seattle, Bellevue, the Sound Cities Association, and special purpose districts.”

p. 1-20, TYPO

*“Work to maintain those growth pattern**s** and limit new sprawl from happening continues today, as it is critical to supporting efficient and sustainable communities and protecting rural character, the environment, and natural resources.”*

p. 2-23, TYPO

...The County's two unincorporated activity centers (Skyway and White Center) meet the criteria for countywide center designation. King County intends to apply for this designation following adoption of the 2024 Comprehensive Plan.

p. 3-4, STRIKETHROUGH OMISSION

“The purpose of the zoning and land use designations in the Rural Area is to provide services and limited goods that (~~satisfy rural residents' and local businesses' daily needs~~) provide for the daily needs of rural residents and businesses.”

p. 3-24, POLICY R-317 WAS ELIMINATED, BUT SUBSEQUENT NUMBERING NOT CHANGED.

p. 10-20, TYPO

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Policy ED-602, “c” should be “c.”

p. 12-4, POLICY I-201 WAS ELIMINATED, BUT SUBSEQUENT NUMBERING NOT CHANGED.

p. 12-5, POLICY I-204a

3rd line: “...Growth Area boundary at the ((~~four~~) five-year point of the eight-year update...” Should be changed to “ **eight ten**-year update...”

p. G-23, Public Review Draft

2nd sentence: “A Public Review Drafts is published prior to transmittal of”

Appendix C goes from p. C-9 to p. D-10 and continues as such through p. D-24.