

CDUP23-0002 Wildlife Meadow Glamping and Recreational Vehicle Park

GMVUAC Public Comment

Date: August 6, 2023

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Subject: **CDUP23-0002 Wildlife Meadow Glamping and Recreational Vehicle Park**

The Greater Maple Valley Unincorporated Area Council (GMVUAC) herein provides its detailed Comments on the subject proposal to allow construction, in three phases, of a recreational campsite in Ravensdale in King County's Rural Area consisting of 8 tent, 25 RV and 15 cabin sites together with all the supporting facilities, such as parking, toilet/shower, kitchen, office/host and an onsite store for campers.

We have reviewed all available documents provided by the Department of Local Services-Permitting (DLS-P) Division,—including the SEPA Checklist, as well as applicable King County Code and Policies, parcel history, and business feasibility / possible future uses. We developed a set of comprehensive **Conclusions** based on the above information and provide a set of **Recommendations**.

In our work we also have interacted with people in the surrounding vicinity and nearby neighbors of the proposed project to understand the community's multiple concerns.

Clearly, we see many issues related to the proposed project and detail them herein.

It must be kept in mind the proposed project in King County's Rural Area and the *Cedar River / Ravensdale Rural Forest Focus Area (RFFA)* calls for a large *commercial* operation with *high-density housing* that, based on experiences at other operations of its kind in King County, could and, probably, will, expand to even higher density housing. Coupled with an overworked and understaffed DLS Permitting Division's Code Enforcement Group, it could prove extremely difficult to enforce King County Code **Title 21A ZONING, 21A.08.040 Recreational/cultural land uses, A. Recreational/cultural land uses** for an RV per *"Condition 2. Recreational vehicle parks are subject to the following conditions and limitations, a. The maximum length of stay of any vehicle shall not exceed one hundred eighty days during a three-hundred-sixty-five-day period;..."*

Based on our research, review of all the available documents, and the rationale contained herein, we recommend the proposed project permit application be denied outright. Should the proposed project permit application *not* be denied outright, we recommend an Environmental Impact Statement (EIS) be conducted under the State

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Environmental Policy Act (SEPA) to address the serious *local* environmental concerns cited herein, as well as the *regional* concerns including those associated with the City of Kent water supply. Should the proposed project permit application be approved, we cite many specific Conditions to be imposed and enforced! We would emphasize that one of the criteria given in KC Code **21A.44.040 Conditional use permit. G.** is that: *“The conditional use will be supported by adequate public facilities or services and will not adversely affect public services to the surrounding area or conditions can be established to mitigate adverse impacts on such facilities;...”* Herein, we have detailed our concerns regarding such impacts.

Once again, we strongly recommend that DLS-P not commit to approving Conditional-Use Permits (CUPs), or Special-Use Permits (SUPs) for that matter, that it cannot and, thus, will not be able to enforce to the detriment of unincorporated area residents!

We are available to answer any questions KC DLS-P may have regarding our Comments herein. Thank you.

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**CDUP23-0002
Wildlife Meadow Glamping and
Recreational Vehicle Park**

Proposed to be Sited in Ravensdale, WA

***Greater Maple Valley
Unincorporated Area Council***

Public Comment

Submitted August 6, 2023

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Introduction

The proposed project calls for a “wildlife” “glamping” and “recreational vehicle park.” Yet it is *none* of these.

“Wildlife” often is seen in many Rural Area locations, especially near or within forested areas. However, the proposed site is an existing recently clearcut parcel with limited opportunities for wildlife interaction or viewing.

“Glamping” (i.e., glamorous camping) is typically characterized by amenities not typically available at a regular campground, such as remote location with exceptional views, that offers special adventure activities, events and high-end food, usually supported by a large commercial kitchen. However, the proposed project does not meet the qualifications for “glamping.” It is simply a high-density commercial campground and recreational vehicle park located along a busy state highway, ~2 mi from the Maple Valley city limits and its extensive urban amenities located at Four Corners—the intersection of two major State Highways, SR-169 and SR-516, in southeast King County.

“Recreational Vehicle Park” to contain 48 rental sites, including 25 Recreational Vehicle (RV) spots plus a lot, lot more—all crammed into a small area on the parcel. In the long term this “RV Park” most likely will *devolve* into a place to park RVs.

We have reviewed all the documentation made available by the King County Department of Local Services-Permitting Division (KC DLS-P)—see **Documentation** section herein. Herein we provide an assessment of the proposed project; a critique of its key aspects and how those measure up against applicable King County Code and King County Comprehensive Plan (KCCP) Policies; a review of all State Environmental Policy Act (SEPA) Checklist items; a set of Conclusions; and a compilation of specific Recommendations.

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Proposed Project

Project Name: Wildlife Meadow Glamping and RV Park

Proposal: A Conditional Use Permit (CUP) to allow construction, in *three phases*, of a recreational campsite consisting of 8 tent, 25 RV and 15 cabin sites together with all supporting facilities, such as parking, toilet/shower, kitchen, office/host and an onsite store for campers. This represents a commercial facility to be sited in King County's Rural Area and in the Rural Forest Focus Area.

CUP: CDUP23-0002: <https://kingcounty.gov/~media/depts/permitting-environmental-review/dper/documents/PublicNotices/CDUP23-0002-NOA.ashx?la=en>

Location: Northside of SE Kent-Kangley Rd, ~1/2 mile east of the intersection of SE Kent-Kangley Rd and Landsburg Rd SE. Within King County's Rural Area. Within the Cedar River / Ravensdale Rural Forest Focus Area (RFFA). Situated ~2 mi from the Maple Valley city limits.

Parcel: 3022079103; 47.31 ac; zoned RA-10.

Parcel Status: In 2007, at the applicant's request, the parcel was granted *Designated Forestlands* status, resulting in a greatly reduced property tax burden. Due to extensive historical Boundary Line Adjustments by the applicant, the parcel has only *one* Development Credit on it and, thus, only a single residence could be built when and if the *Designated Forestlands* status is changed, in spite of the RA-10 zoning.

Sensitive Areas: Per Sensitive Area Notice: [20030505001781](#) the parcel falls fully within a Class 1 Critical Aquifer Recharge Area (CARA), and contains one small known Category IV wetland. Though no other sensitive areas on the site are known to us, the vast majority of the site was *not* surveyed for sensitive areas.

Existing Vegetation: This parcel was clearcut by the applicant in 2011, but he failed to replant the unit during the 3-yr period allowed under the Washington Forest Practices Act regulations, thus allowing non-native invasive brush (mostly Scot's Broom and Himalayan Blackberry) to take over the site. While the applicant eventually did replant, regrowth of invasives continues to be an ongoing problem, with few tree saplings surviving on the site. As mitigation for the campground, the proposal mandates "*preserving*" 21-ac of this '*Native Growth*' (predominantly non-native invasive brush).

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Documentation

The following documents submitted to the County by the applicant were reviewed in preparing our Comments herein (*listed below by date of issue*):

Geotechnical Report, February 16, 2021.

Critical Area Report, March 29, 2022.

Traffic Impact Analyses, April 2022.

Septic Feasibility Report, July 5, 2022.

SEPA Checklist, January 18, 2023.

Grading and Drainage Plans, January 27, 2023.

Construction Details, January 27, 2023.

Preliminary Technical Information Report, January 27, 2023—Please note this includes, as Appendices, several of the above documents.

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SEPA Checklist

B. ENVIRONMENTAL ELEMENTS

SEPA Checklist 3. — Water

Well System

(Please note the following discussion might better fit under SEPA Checklist 16. — Utilities, but we have placed it here from a technical standpoint)

Water is a very sensitive issue in this area, and will likely become even more so with increasing demand and drought-caused supply constraints. The WA State Administrative Code defines **Critical Aquifer Recharge Areas (CARAs)** in **WAC 365-190-100, which states:** *“(1) Potable water is an essential life sustaining element for people and many other species. Much of Washington's drinking water comes from groundwater. Once groundwater is contaminated it is difficult, costly, and sometimes impossible to clean up. Preventing contamination is necessary to avoid exorbitant costs, hardships, and potential physical harm to people and ecosystems.”*

The proposed project falls totally within the Class 1 **Critical Aquifer Recharge Area** that impacts the City of Kent's watershed, and the Kent and Covington well fields. The parcel also lies just outside the (shortest) 1-yr travel time zone of the City of Kent's **Wellhead Protection Area**. Rock Creek, located just 800 ft south of, and down-gradient of the proposed project, provides the majority of the City of Kent's water supply through its Clark Springs facility just west of Ravensdale. The primary concern is the porous soil of the proposed project's septic drain-field could easily contaminate its down-gradient City water supply. We understand the City of Kent is aware of and very concerned about the proposed project and its potential impact on its water supply—both from a supply and from a contamination standpoint—and also will be submitting Comments.

The project proposal calls for sourcing the facility's water needs from an existing on-site Group A well. The proposed campground is comprised of 49 units (25 RV, 12 cabin, 8 tent, 3 tipi, 1 camp host cabin), plus restrooms, public kitchen, store, office, RV dump site, and 5.06-ac of *“new grass/landscape areas”* that presumably will need watering. This is a very substantial *“campground,”* and might be expected to accommodate 200+ guests and employees. Even if only *“seasonal”* (note we see nothing in the application that would restrict this to *“seasonal”* use), this still represents a very large increase in water usage over alternative uses of this site—forestland or one single family residence. The parcel is 47 ac and zoned RA-10, which would imply four housing units would be permitted on this property, if the *Forestland Designation* was dropped. But the reality is, through the applicant's four prior Boundary Line Adjustments (BLAs) to create the Big Valley housing development, the 292nd Ave SE lots, the Ravens Corner property, his

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personal residence parcel (67 ac), and a couple of other lots, this 47-ac parcel in question has only one development credit on it, as does the adjoining parcel just to the west (also owned by the applicant). Consequently, even if the *Forestland Designation* is dropped and the parcel is developed as residential, only one house could be constructed on this 47 ac.

In addition, most of this facilities' water usage, presumably, would be during the summer, when water supplies are the tightest. Some other residents within the vicinity (e.g., Lake Retreat) already have reported water supply issues with their domestic permit-exempt wells. This major new commercial use would certainly represent yet another draw on an already very stressed water supply. It also should be noted that forests have been shown to help *retain* water within an aquifer versus this type of proposed commercial development that tends to *deplete* the aquifer.

For Group A Water Systems, **KC Code** states:

13.24.007 Definitions.

- A. Group A water system: a public water system with 15 or more service connections, regardless of the number of people served, or a system serving an average of 25 or more people per day for 60 or more days within a calendar year, regardless of the number of service connections.
- B. Group B water system: a public water system which is not a Group A system, with less than 15 service connections and serving an average of less than 25 people for 60 or more days within a calendar year, or any number of people for less than sixty days within a calendar year.
- C. Individual water system: a water system serving only one single family residence.
- D. Public water system: any water system except one serving only one single family residence. (Ord. 11616 § 16-19, 1994).

Our understanding is that, if a project is *within* a Public Water System Coordination Act planning area, water service must be requested from that utility; and if that utility can provide service in a timely and reasonable manner, water service must be obtained from the utility, and plans to develop a new water system must be abandoned (**WAC 246-293-190**). The proposed project falls within the Covington Water District (CWD) as established by the South King County Coordinated Water System Plan. However, from preliminary discussions with the CWD Engineering Manager, his view is that it is financially impractical to extend the Covington Water mainline out to this site. If that view holds up, it appears this facility would require a **Group A Transient Non-Community Water System** (Group A TNC), which are regulated under **Chapter 246-290 WAC**. Per the WA Dept of Health's *Group A Transient Non-Community Water System Design Guidelines*, Revised November 10, 2022:

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"Transient non-community water systems provide drinking water to a population that changes day to day. They include, among others, campgrounds, hotels, rest areas, and restaurants with their own water supplies."

These guidelines indicate development of a *new* Group A TNC is to be inspected and approved by the Dept of Health before the well is dug. The guidelines also indicate that CWD could still serve as a Satellite Management Agency (SMA)—as they do for Sugarloaf Estates, in which the SMA owns and operates the new water system. State law (**RCW 70A.125.060**) requires an approved SMA to own or operate all new water systems of this type if a SMA is available.

While the campground application labels the *existing* well a Group A well, the Water Well Report, Well ID Tag No. BMK956, drilled May 7, 2021 (report dated June 10, 2021), indicates this was drilled as a *Permit Exempt Domestic* well. Well statistics:

Proposed Use: Domestic

Depth: 80 ft

Bore: 6 in

Flow by air test: 60+ gallons per minute (gpm) (conducted on May 7, 2021)

Well use: Domestic

Consequently, we pose the following questions:

1. Does the proposed project, indeed, fall under the requirement for a Group A Transient Non-Community Water System, as opposed to a standard Group A community well for domestic purposes?
2. Is a Group A Transient Non-Community Water System a permit-exempt well? Or is a water right required? Or is the need for a water right dependent on volume of water being withdrawn?
3. Is the well within a Critical Water Supply Service Area and/or a Streamflow Restoration area? According to the WA Dept of Ecology regarding Streamflow Restoration areas: *"As of January 19, 2018, new permit-exempt wells in this watershed (WRIA 8) are capped at 950 gallons per day for domestic use as the maximum annual average (350 gallons per day during drought)."* Please note that this specifically is tied to this property address. This 950 gallons per day (gpd) for permit-exempt wells (typical domestic wells) is significantly below the maximum 5,000 gpd allowed for single or group well domestic use and likely would be *insufficient* to service the needs of the proposed project, supporting up to 200 people and irrigating over 5 ac of new grass and landscaping.
4. If CWD provides water or serves as a SMA, how does this affect the question regarding the need for a water right?

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Onsite Septic System

With 49 'living units' this campground will generate a lot of sewage. The *Septic Feasibility Report*, dated July 5, 2022, calls for this waste to be processed through an on-site septic system (OSS). The septic assessment confirmed the feasibility of on-site septic disposal, but specified, "*On-site sewage disposal needs additional treatment to allow for proper treatment prior to the effluent going thru the coarse soils.*" Such pre-treatment should be explicitly built into the project plans.

It is somewhat concerning the proposed septic drain-field is only ~50 ft from the east property line, where the adjacent homes rely on community wells located on their properties. This does not appear to be adequate separation given the high-volume campground sewage flows and the high permeability of the soil. The *Geotechnical Report*, dated February 16, 2021, indicates peak groundwater levels are only 4 – 7.5 ft below the surface. The applicant has provided no assessment of the risks of groundwater contamination from the septic drain-field.

The engineering plan shows the RV dump site to be located just off Kent-Kangley Rd, and *outside* the campground gate. As such, this sewage dump (and associated water supply) would be available to anyone—not just campground guests. Will it and the nearby (~125 ft) bathroom facilities eventually attract an RV encampment along the extra-wide shoulder along Kent-Kangley Rd? Clearly, such a dump site should be moved to *within* the gated campground confines.

While the SEPA Checklist states that "*Sanitary waters will be treated via the proposed on-site septic system [OSS],*" the RV dump site is immediately adjacent to the *Large Linear Sand Filter Vaults and Infiltration Trenches*. These RV tank wastes, RV sewer connections, and the South Restroom sewage must all be processed through the OSS, which appears will require a pump system. But again, no OSS design information has been provided in the available reports. Studies have also shown that RV-tanked waste oftentimes includes chemicals such as chlorine, formaldehyde, and deodorizing agents, which must be safely handled by the OSS.

While chlorine will usually dissipate relatively quickly (unless it binds with other organics to form more stable compounds), formaldehyde doesn't, as it is fairly stable and remains toxic for long periods of time at relatively small concentrations. The other concern is that the applicant has virtually no control over what is dumped in disposal tank or sump from RV tanks. The applicant can issue or post requirements, but in practical terms has little or no control over what would be in the RV tanks getting dumped, as in a practical sense it would be a huge undertaking (not to mention expensive) to monitor this through sampling.

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While the *Geotechnical Report*, dated February 16, 2021, generally refers to the soils as being well drained/suitable for on-site sewage, and shallow infiltration for stormwater, the data also indicates that shallow groundwater was present across much of the site.

The report also indicates the shallow soils are composed of a thin layer of topsoil, underlaid by sandy gravel and gravelly sand, cobbles and referred to a reddish or rust color. This is typical in soils exposed to or inundated by water over a long period of time. However, since there was no hydrological evaluation conducted, though the presence of groundwater was noted where encountered, there were no groundwater wells, or determinations as to flow rates. There was a general statement offered as to the groundwater encountered likely being the seasonal highest extent of groundwater, but that was a professional judgement call, not based on any specific cited or collected data.

Another concern would be the lateral component of flow in the shallow groundwater regime, and related impacts in the direction of flow *outside* the property boundaries. In fact, given the depth of fairly widespread shallow groundwater on-site, we are concerned this groundwater potentially could make it into deeper units causing contamination of nearby private household wells.

The State has adopted new requirements through the Department of Health related to OSSs. Currently, King County is updating its OSS requirements/regulations and has formed a committee run by Public Health Seattle/King County on same. We contacted a member of that committee, who stated that, due to the nature of the wastes being disposed of, the proposed development should be required to put in a *Treatment System* and that any discharges be metered and sampled for the range of chemical and biological contaminants (or their associated markers) known or suspected to be contained in such wastes. The committee member also expressed an issue of scale, where such a *Treatment System* would be *inconsistent* with the surrounding land use and rural character, as well as potentially a serious source of groundwater contamination.

We strongly recommend Public Health Seattle/King County be contacted, given the parcel's RA-10 zoning, the site's shallow groundwater, and the planned volume and nature of disposal. Clearly, there appear to be some substantial issues that must be addressed and might be found cannot be mitigated.

Although it is not publicly known if the applicant plans any *future phases*, expansion into the ~10-ac in the southeast portion of the parcel in question, and onto the *adjacent* parcel to the west, is a very real risk. Should this occur, it would *exacerbate* the issues we raise herein.

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SEPA Checklist 7. — Environmental Health

Although the applicant states there are no known environmental health hazards on the site today, there will be, should the proposed project be permitted. Of particular concern would be Propane, both in RV use, and likely stored and sold on-site as is common in higher-end RV parks and campgrounds. Another potential “hazard” is *noise*, including that produced by the many on-site generators. And contrary to what the applicant states, the small buffers of so-called “*native vegetation*” will provide literally no noise abatement for nearby neighbors.

In fact, all buffers are proposed to consist of native growth (none of which really exists on the parcel at this time, so all would have to be planted and grown—and watered—from scratch). On the *east* side, where a residential neighborhood exists, the proposed 20-ft buffer essentially is useless, especially with so many of the proposed Cabins within ~35 ft of the property line itself. On the *north* and *west* sides 20-ft and 15-ft buffers, respectively, are proposed, with no real explanation for the difference. In any case, these proposed buffers also are inadequate, because there is no guarantee that the Applicant, who currently owns both, won’t sell either or both in the future. On the *south* side is Kent-Kangley Rd where a 30-ft buffer is proposed. This is inadequate to effectively screen this proposed commercial development from this major area arterial. The Friends of Rock Creek Valley, in their *Rock Creek Valley Conservation Plan and Priorities (RCVCP)* (2004), which was endorsed and adopted by the King County Council, identified this segment of Kent-Kangley Rd as part of a “*loop drive*” with a *viewshed* priority to maintain “*forested*” foreground views from this arterial to the extent possible. Where the properties along this arterial included non-forest “*development*” (a commercial campground/RV park certainly would apply), the RCVCP called for targeting 200- to 250-ft forested roadside buffers. The “*community*” goal to *preserve forestry* is elaborated in detail in the RCVCP. In the case of this commercial campground/RV park, which will be very visible from Kent-Kangley Rd, even complying with the minimum recommended visual buffer of 100 to 150 ft, and backing out the ~20-ft of timbered right-of-way, would imply the campground should have an 80- to 130-ft setback planted with conifers of a size that would visually screen the development from the roadway.

SEPA Checklist 8. — Land and Shoreline Use

While zoning is RA-10, Land Use is Designated Forestland, within a County-designated Rural Forest Focus Area (RFFA). We address this in detail in the **Applicable Policies** section under **Rural Forest Focus Area KCCP Policies**.

The proposed project parcel is entirely located within a *Category 1 CARA* and entirely within an area ranked *high susceptibility of groundwater contamination*. CARAs are one element of the “*critical areas*” for which State’s Growth Management Act (**RCW 36.70**)

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requires local governments to develop policies or regulations to protect their functions and values. Again, CARAs are the geographic areas that have a “critical recharging effect on aquifers used for potable water” (RCW 36.70A.030(5)).

According to the State Department of Ecology (<https://ecology.wa.gov/Water-Shorelines/Water-quality/Groundwater/Protecting-aquifers/Critical-aquifer-recharge-areas>)—our highlighting):

“The following steps characterize where groundwater resources are important to understanding how to protect them.

- *Identify where groundwater resources are located.*
- *Analyze the susceptibility of the natural setting where groundwater occurs.*
- *Inventory existing potential sources of groundwater contamination.*
- *Classify the how vulnerable the groundwater is to contamination events.*
- *Designate areas that are most at risk to contamination events.*
- *Protect groundwater by minimizing activities and conditions that pose contamination risks.*
- *Ensure that contamination prevention plans and best management practices are followed.*
- *Manage groundwater withdrawals and recharge impacts to:*
 - *Maintain availability for drinking water sources.*
 - *Maintain stream base flow from groundwater to support in-stream flows, especially for salmon-bearing streams.”*

The WA Department of Ecology handbook titled, *Critical Aquifer Recharge Areas Guidance*, Pub. 05-10-028, Rev. March 2021, states the following:

- p. 3: “The goal of establishing Critical Aquifer Recharge Areas is to protect the functions and values of a community’s drinking water by preventing pollution and maintaining supply.”*
- p. 4: “Critical Aquifer Recharge Areas (CARA) are defined under the GMA [Growth Management Act] as ‘areas with a critical recharging effect on aquifers used for potable water, including areas where an aquifer that is a source of drinking water is vulnerable to contamination that would affect the potability of the water, or is susceptible to reduced recharge.’”*
- p. 19: “Preventing pollution [of a Critical Aquifer Recharge Area] depends on controlling land use activities to prevent contaminant spills and leaks. Critical Aquifer Recharge Areas are designated so that greater control can occur where land use activities are a high-risk for polluting sensitive aquifers.”*

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The proposed project gives us pause on each of these Ecology concerns, especially the third item above on “*preventing pollution*” by “*controlling land use activities to prevent contaminant spills and leaks.*”

In addition, our research using King County IMAP shows there are 11 Group D domestic wells, 4 Group B community wells, and 5 Group A community wells “*downstream*” from the proposed project parcel to the City of Kent’s water intake at Clark Springs near Four Corners. Any Conditions placed on any permit granted must account for these concerns. We expect the City of Kent also will address this in its Comments.

Finally, on item SEPA Checklist #8, item i. “*Approximately how many people would reside or work in the completed project?*” the applicant provides a non-answer: “**Not applicable as the property is currently vacant.**” This is a non-answer, actually, based on the site plans, etc. possibly 200+ people could “*reside or work*” on site.

SEPA Checklist 9. — Housing

On c. “*Proposed measures to reduce or control housing impacts, if any*” the applicant states: “**There are no measures to reduce or control housing impacts proposed at this time.**” This is completely unacceptable—why are there no proposed measures to control such impacts given the size and number of RVs planned to be accommodated?

SEPA Checklist 14. — Transportation

There are several reasons that traffic generated by the proposed project will be far in excess of what should be permitted at this location:

- Taking the proposed action at face value, the trip generation claimed in its own traffic study is much greater than is appropriate for the underlying Rural Area zoning.
- The parcel at hand is “*entitled*” to even less new development than the underlying zoning would suggest, as previous developments already account for nearly all of the “*development rights*” associated with the original tract of ~300 acres.
- The stated description of the development as a “*campground*” is questionable considering the lack of on-site features to attract a camping clientele, which suggests that for marketplace reasons the site will *evolve* into a mobile home park whether called that or not, which is against King County Code and for which much higher trip generation rates would apply (see **Applicable King County Code** section).

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- The site plan shows considerable open space, presently cleared and vacant, which could become *additional* phases of development, outside the scope of the proposed project. Within the scope of the proposed project is the ~10-ac of *uncommitted* land in the southeast corner, which seemingly would be available for expansion. Finally, there is another 37-ac parcel immediately to the west under the same ownership. There certainly is the potential for that parcel to be developed in the same manner as the parcel in question.

The applicant's traffic study, dated April 2022, by Transpo Group, is based on the applicant's description of a campground site consisting of 45 tent, glamping, and RV sites, and trip generation rates according to the Institute of Transportation Engineers (ITE) Trip Generation Manual for land use code #416, Campground/Recreational Vehicle Park [it should be noted that the applicant's actual proposal consists of 48 sites, plus a camp host cabin, there also would be employees to account for maintenance, office, store, cabin cleaners, etc.] Those factors result in an estimated 120 daily trips, with 12 trips in the PM Peak Hour. However, the applicant proposes slightly more units—48 rental sites+ camp host cabin; i.e., 49 units, so the traffic analysis should be *updated* to conform—estimated to be 130 daily trips.

Now, the underlying zoning for this area is RA-10, so one might expect a 47-ac site to be split into at most 5 ten-acre parcels, and four or five houses would be built. The ITE Trip Generation Manual prescribes a trip rate of 10 daily trips (1 Peak Hour trip) per house, suggesting that a typical 50-ac site zoned RA-10 would generate 50 daily trips and 5 peak hour trips. Therefore, the proposal at face value would generate 260% of the traffic normally expected from a parcel of its size with this zoning.

As is discussed elsewhere in more detail, the prior history of development actions by the applicant for the entire 304 ac of RA-10 zoned land purchased from Plum Creek in 1997 has resulted in the fact that the "*allowable*" number of residential homes on this particular parcel is now only one unit, and not the four or five units that a casual observer would deduce from the underlying zoning. Therefore, the amount of trip generation to be associated with this parcel should also be limited to what is expected of one home; i.e., 10 daily trips and 1 peak hour trip. The proposed project's 120 daily trips is 13 times that amount (1300%).

The trip generation will be far in excess of what is appropriate for the site given the limited "*development rights*" applicable to the site based on prior development history, or even in excess of appropriate trip generation for the underlying zoning as RA-10. Beyond that, the marketplace feasibility of the proposed project should be considered, taking into account the prospect of future conversion to what amounts to a mobile home park including not only this parcel but also the adjacent land parcel of similar size and under the same ownership. Traffic impacts of such potential development are substantial and of an *urban* nature not appropriate for this *rural* location, nor have such

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impacts been addressed to date. Again, the City of Maple Valley should be consulted regarding impacts on that city's streets.

SEPA Checklist 15. — Public Services

On item a. we are concerned the Water Trucks of King County Fire Protection District #43 will be unable to fight a fire on such a commercial parcel with so many densely packed RVs, etc. and many potential sources for fire initiation and spread. With up to 200+ people on-site one single ingress/egress route easily could cause emergency use problems.

On item b. *“Proposed measures to reduce or control direct impacts on public services, if any.”* The following does not constitute a credible response: **“There are no measures to reduce or control direct impacts on public services proposed at this time. Impact fees may be applicable and will be paid accordingly.”** The applicant must identify what Public Services this commercial enterprise will be using, how much, how often, etc.

SEPA Checklist 16. — Utilities

On item a. the applicant states there is a *“septic system”* on-site. We believe this is erroneous. We find no information beyond the *Septic Feasibility Report*, July 5, 2022 that addresses this very large OSS that presumably will be capable of handling the waste streams of 200+ campground guests and employees, plus the RV dump site.

On item b. there are many unanswered questions:

- Is the existing well on-site already certified as a *Group A Transient Non-Community Well* ?
- Will the water service provider, Covington Water District, be operating this system ?
- Has a Certificate of Water Availability been issued for this development ?

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Applicable King County Code

King County Code **Title 21A ZONING, 21A.08.040 Recreational/cultural land uses, A. Recreational/cultural land uses** states for RA-zoned parcels [P-Permitted Use; C-Conditional Use]—our highlighting:

Campgrounds—P16, C16 a

16. Subject to the following conditions:
 - a. The length of stay per party in campgrounds shall not exceed one hundred eighty days during a three-hundred-sixty-five-day period; and
 - b. Only for campgrounds that are part of a proposed or existing county park, that are subject to review and public meetings through the department of natural resources and parks.

Consequently, KC DLS-P *cannot* issue a Permit outright for the proposed project as a “Campground,” since 16b. is not satisfied. However, it *can* issue a CUP for the proposed project as a “Campground,” since only 16a. is called out as needing to be satisfied.

RV Park—C2, C18, P19

2. Recreational vehicle parks are subject to the following conditions and limitations:
 - a. The maximum length of stay of any vehicle shall not exceed one hundred eighty days during a three-hundred-sixty-five-day period;
 - b. The minimum distance between recreational vehicle pads shall be no less than ten feet; and
 - c. Sewage shall be disposed in a system approved by the Seattle-King County health department.
18. Subject to review and approval of conditions to comply with trail corridor provisions of K.C.C. chapter 21A.14 when located in an RA zone.
19. Only as an accessory to a recreation or multiuse park.

Consequently, KC DLS-P *can* issue a CUP, for the proposed project as a “RV Park,” but it must *include* Condition 2 above that limits length of stay to ~1/2 yr. In addition, KC DLS-P *cannot* issue a Permit outright for the proposed project as a “RV Park,” since Condition 19. is *not* satisfied.

Based on King County Code **Title 21A ZONING, 21A.08.040 Recreational/cultural land uses, A. Recreational/cultural land uses** provisions the parcel in question:

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1. *Can* be used as a Campground as long as Condition 16a. above is satisfied: “*shall not exceed one hundred eighty days during a three-hundred-sixty-five-day period.*”
2. *Can* be used as an RV Park as long as all three parts of Condition 2. above are satisfied.
3. *Cannot* become a Mobile Home park (this will require on-the ground code enforcement) per Conditions 2. and 16. above.

Assuming effective enforcement, Condition 2 above and its 180-day maximum stay should *preclude* the worst-case scenario of this facility ultimately becoming a permanent *Mobile Home Park*. That said, we expect that allowing stays of up to 180 days might *not be consistent* with the proposed project, and potentially could still represent a major negative impact on the local and greater community. Further, approval of the proposed project would set a *precedent* that would pose a significant obstacle to King County and the community’s goals of retaining forestlands, particularly in the Rural Forest Focus Areas of southeast King County.

To be clear regarding *Mobile Home Parks*, County Code **Title 21A.08.030 Residential land uses** states they are a *Special-Use* under the following note:

“*13. No new mobile home parks are allowed in a rural zone.*”

So, should the proposed project effectively become/revert to a *Mobile Home Park*, the County would be required to step in and promptly shut it down.

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Applicable Policies

The proposed project represents a large commercial facility situated on ~47 ac in the Rural Area. It would be in direct contradiction to the goals of the local community, the greater region PSRC’s *VISION 2050*, the County’s *Countywide Planning Policies (CPP)* and *Comprehensive Plan (KCCP)*, and the State’s *Growth Management Act (GMA)*—our highlighting below:

GMA

RCW 36.70.070 Comprehensive plans—Mandatory elements. (5) Rural element. ... accommodate appropriate rural economic ... uses that are ... consistent with rural character protect the rural character ... preserve the character of existing natural neighborhoods and communities,

VISION 2050 (MPPs)

RGS 13 Plan for (urban) services that serve rural residents to locate in neighboring cities ... to avoid the conversion of rural land into commercial uses.

RGS 14 Manage and reduce rural growth rates over time ... to maintain rural landscapes and lifestyles and protect resource lands and the environment.

DP-37 Ensure ... development ... is rural in character ... focused into communities

PS-5 Do not provide urban services in rural areas....

CPPs

DP-46 Provide opportunities for residential and employment growth within Cities in the Rural Area at levels consistent with adopted growth targets. Growth levels should not create pressure for conversion of nearby Rural or Natural Resource lands,...

DP-47 Limit growth in the Rural Area to prevent sprawl and the overburdening of rural services, minimize the need for new rural infrastructure, maintain rural character, and protect open spaces and the natural environment.

DP-52 ... limit new nonresidential uses located in the Rural Area to those that are demonstrated to serve the Rural Area, unless the use is dependent upon a rural location.

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KCCPs

R-201 It is a fundamental objective of the KCCP to maintain the character of its designated Rural Area. ... In order to implement GMA, it is necessary to define the development patterns that are considered rural, historical or traditional and do not encourage urban growth or create pressure for urban facilities and service. ... Traditional rural land uses of a size and scale that blend with historic rural development; and Rural uses that do not include primarily urban-serving facilities.

R-324 Nonresidential uses in the Rural Area shall be limited to those that: ... Require location in a Rural Area;

Rural Forest Focus Area KCCP Policies

R-207 Rural Forest Focus Areas are identified geographic areas where special efforts are necessary and feasible to maintain forest cover and the practice of sustainable forestry. King County shall target funding, when available, new economic incentive programs, regulatory actions, fee and easement acquisition strategies and additional technical assistance to the Rural Forest Focus Areas. Strategies specific to each Rural Forest Focus Area shall be developed, employing the combination of incentive and technical assistance programs best suited to each focus area.

R-208 The Rural Forest Focus Areas should be maintained in parcels of 20 acres or more in order to retain large, contiguous blocks of rural forest. Regulations and/or incentives should seek to achieve a maximum density of one home per 20 acres.

The parcel in question and the adjacent parcels have been used for commercial forestry for well over 100-years. The County-designated *Forest Production District (FPD)* runs up to the Kent-Kangley Rd adjacent to the parcel. Again, while zoned RA-10, the parcel is *within* the County-designated *Cedar River / Ravensdale Rural Forest Focus Area (RFFA)*. This tract was a core part of Plum Creek Timber's commercial timberland base (and predecessors Burlington Resources and Northern Pacific Timberland's) up until the applicant purchased this half-section from Plum Creek in 1997. The applicant petitioned the County Assessor to designate this tract for Forestland taxation and land use under State **RCW 84.33** in 2007, and was granted that request. Since then, property taxes have been paid at forestland values (~1% of taxes that would have been assessed without the forestland exemption). The applicant clearcut the subject parcel (and most of the adjacent parcel to the west – 75 ac of the total 84 ac) in 2011 under a WA Forest Practices Act (FPA) permit. Unfortunately, the applicant failed to replant this 75 ac within the three-year period required by the FPA; but did replant after the State and County came down on this violation.

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The community and the County have identified preservation of commercial forestlands as a key priority. This parcel, falling within a Rural Forest Focus Area, would be a priority to retain in forestry. The proposed Glamping/RV Park would be a move away from this goal. While a commercial campground/RV park is a Conditionally Permitted Use on RA-zoned lands, as the applicant repeatedly points out, such use should be aimed at RA-zoned lands that do *not* fall within a Rural Forest Focus Area, and are *not* still under forestland management—particularly lands that are adjacent to the FPD. We recommend the Rural Forest Commission be consulted on this proposed land-use conversion.

We do not know if the parcel has any *Transfer of Development Rights (TDRs)* attached to it or if such programs are contemplated to be used in the future by the applicant. If so, the following KCCP Policy would apply:

R-318 Prior to the county's allocation of Transferable Development Rights to a sending site landowner, the landowner shall record and place on title of sending site parcel a conservation easement documenting the development restrictions. If development rights are being retained for future development, the subsequent development must be clustered, and the tract preserved with a permanent conservation easement shall be larger than the developed portion. In the case of lands within the Rural Forest Focus Areas, no more than one dwelling unit per 20 acres shall be retained, and the tract preserved with a conservation easement shall be at least 15 acres in size.

We have some concerns here. Although we need to do more research, we believe the following represents the applicant's parcels *development credit* scenario. Following two or more Large Lot Segregations of the ~304-ac of RA-10 zoned lands purchased from Plum Creek in 1997 and three Boundary Line Adjustments, the applicant created and sold off 23 separate lots (one of which carries two development credits; and only 3 of which met the 10-ac minimum lot size for RA-10 zoned lands). This left the applicant with a single ~151-ac parcel, comprised of what is today his 67-ac homesite, the 47-ac parcel in question, and the 37-ac parcel just to the west. Then the applicant, apparently, did *another* Large Lot Segregation to split this single ~151-ac parcel into the *three* parcels he owns today, and then did a fourth Boundary Line Adjustment in December 2022 to tweak the lot line between the parcel in question and the parcel to its west resulting in the boundaries we see today.

Consequently, we believe the applicant's homesite parcel likely retains 4 development credits (if he hasn't sold any of these as Transfer Development Rights), leaving 2 credits out of the original 30 – one each on the parcel in question and the parcel to its west. Once again, we need to do more research here, but did want to point out this key issue.

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Business Feasibility / Future Uses

Should the proposed project be approved (as currently planned *or* with revisions) and developed, we have several major concerns:

Seasonality

While this proposal is pitched as a “*seasonal*” recreation (i.e., RV/Glamping) facility, there appears to be nothing in writing that defines what the *operating season* will be, or even is expected to be. The applicant reportedly has mentioned the proposed project would be open for six months and closed for six months. Yet there is nothing in this application that would restrict the operating window of the facility.

One would expect the summer camping season (i.e., May to September) would be the peak season for this type of facility in this locale. However, with our moderate, lowland climate, it is not unrealistic to keep an RV park open year-round. In fact, with decreased tourism/recreational occupancy through the off-season, the inclination would be to rent out the RV sites, and the cabins through the off-season (i.e., October to April) by the month—or even for the *whole* off-season.

At that point, this very much becomes more like a mobile home park, than a tourist RV park; and you essentially have the equivalent of 38 full-time resident families (25 RV, 12 cabin + 1 camp host/caretaker/overseer cabin) — on a parcel that would otherwise be zoned for four houses, but permitted to house one family due to applicant’s past development practices. We would strongly oppose such a scenario!

Transient Use

As one way to try to avoid the mobile-home park scenario, we would request this business be licensed as a transient accommodation facility, as are most private campgrounds and RV Parks. As such, a maximum stay for each vehicle would be set (e.g., ~ 21-day maximum stay)—which, if enforced, would avoid the mobile-home park scenario. Also, this business license would conform to the business plan the applicant has laid out in the proposal for a *seasonal*, short-term stay facility; and the business would comply with the transient accommodation laws and taxation of the State and County.

Project Success and Future Expansion

Though unexpected, in the event this commercial facility is permitted *and* does succeed financially, the applicant might seek to expand. The ~10-ac of un-utilized land in the southeast of the parcel in question could be used for more RV, tent, and glamping cabin

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sites in the future. This could *double* the current scale of the facility. That again would raise the trip generation by a factor of two versus the previous considerations we discussed earlier. In addition to that, the applicant also owns a 37-ac parcel (#302207-9102) immediately to the west, similarly cleared and similarly conditioned by previous development in the surrounding ~300-ac area by this applicant to have just one dwelling unit of development "*rights*" available to it. Both parcels should be considered to have the same development potential. If this parcel is allowed to develop as a campground, the combined campground potential from both parcels could easily scale to 200 sites—generating over 500 daily trips—even using the seemingly *ultra-conservative* ITE rates for a campground we enumerated earlier. If the site later converts to what amounts to a mobile home park, the potential trip generation again doubles to about 1,000 daily trips.

Frankly, the prospect of even this one facility going to permanent housing should not be permitted, lest the same future outcome arise on the adjacent parcel as well. The traffic impacts of such potential development will be felt all along Kent Kangley Rd west of the site, and into the City of Maple Valley. These potential future scenarios have not been described, nor evaluated, in the applicant's traffic study.

As mentioned, we have serious concerns, from both a *commercial* development in the Rural Area, and from a resource use perspective, about the currently-proposed scale and how that might impact the local community. Doubling, or quadrupling this scale in the future, if he were to expand onto the adjacent parcel, would be a major blow to the community goal of keeping the "*Rural Area rural*" (the GMVUAC's Mission), not to mention the shared County and community goal of retaining forestry within designated Rural Forest Focus Areas.

It must be recognized that, in approving this proposed permit application, there is nothing inherent in this project that would preclude the applicant or a future owner from applying for such an expansion should the personal financial returns look attractive at the time.

Further, there also is nothing to stop others from replicating the applicant's approach here—converting their own forested (or clearcut, as is the case here) RA-10 lands to a similar campground/RV park. As long as the expected financial returns from such an endeavor are greater than the returns expected from forestry, or from owning a single-family home, and the pathway for such a conversion has now been pioneered—why not? In this way, a terrible *precedent* would be set, should the proposed project be approved.

Project Failure and Local Impact

A likely even more devastating impact to the local community, is the risk this proposed commercial facility is built, but then fails financially. Given the apparent business plan

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for a “wildlife” “glamping” and “recreational vehicle park”—none of which fits the proposed project—that underpins this permit application, we fear this is a very real possibility, as there really seems to be nothing to draw the typical RV tourist or *glamper* to this facility with no major attractions, no water-based amenities, no attractive views. The facility would not appear to meet most people’s expectation of what a high-end, RV-park/*glamping* facility should be—recreational facilities, swimming pool, recreational fields, hiking trails, game room, lodge, etc. In fact, besides the sports fields at Ravensdale Park and the limited trails on the Ravensdale-Retreat Natural Area, there only very limited public recreational opportunities or other attractions of interest in the local vicinity exist.

Consequently, we have serious concerns regarding the viability of the apparent business plan that underpins this campground development application. Should the owners get into financial difficulties with this business, there likely is a high risk of reverting to renting out some, or even all, of the RV sites and cabins on a monthly, whole season, or even full-year basis to help pay the bills. Should that scenario unfold, it would resemble a large-unit mobile home park. With approval of the proposed permit application, whether the project succeeds or fails, the long-term impact on the local community likely will be negative.

It should be noted there are many recreational camping facilities in King County, and most of them are in remote areas far distant from urban areas and located alongside recreational attractions such as mountains, lakes and rivers, sometimes with on-site playgrounds or other recreational activity features. Campsites are typically separated by trees and foliage, so each camping party is somewhat secluded from neighboring sites. However, as noted earlier, the proposed project’s site was clearcut in 2011, and allowed to grow back in *non-native invasive brush species*. This will likely take years of active management to successfully eradicate and then plant and allow new vegetation to develop so as to appeal to many campers. In addition, the site plan does *not* include any on-site recreational features. It lacks the ambiance necessary to appeal to customers of “glamping” sites. Many tent campers would find the eight walk-in tent sites to be unappealing, because of the long walking distance from the assigned parking area—it appears to be ~700 ft from the parking area to the most distant campsite, which is much longer than is practical for walk-in camping.

With the lack of attractive features within this facility, and the lack of activities to draw campers to this locale, we fear there is a significant risk of economic failure of the “campground” model, and the site will devolve into a *residential* area for occupants of RV’s, tents, and yurts, rather than a high-end, recreation-oriented clientele. It is unlikely King County will be able to effectively monitor the site to assure Code *short-term occupancy requirements* are met, which leads to the outcome that most sites will have permanent occupants who are not recreation-minded, but just seeking a type of affordable housing. This must be opposed for several reasons. The proposed project’s location is far from desirable for such purposes in addition to being contrary to County

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Code. Augmenting our earlier discussion under SEPA Checklist #14—Transportation, there is no nearby transit service or other urban services useful to some residents, so occupants will be forced to rely on personal automobiles. The trip generation will be more like that of a mobile home park than a “campground.” The ITE trip generation rate for mobile home parks is approximately 5 daily trips per unit, leading to a potential trip generation of 245 daily trips for 49 units, about twice the proposed 130 daily trips, and about 20X the “allowable” trip generation referred to above. This outcome represents high-density urban-style land use, far removed from the expected low-density rural use contemplated by RA-10 zoning . Consequently, we recommend KC DLS-Roads engineers carefully examine the description of a “campground” in the ITE Trip Generation Manual, to determine whether the site’s location and amenities actually conform to that ITE category, or if a more *urban-oriented category*, such as mobile-home park, isn't more *consistent* traffic volume predictor with what's proposed. In addition, we recommend strong weight be given to the opinion of the City of Maple Valley regarding this development's traffic impacts on its road system.

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Conclusions

1. Rural Character: The proposed project represents a *commercial facility* in the Rural Area and is directly contrary to the goals and multiple policies found in our bedrock planning documents: the State’s *GMA*, PSRC’s *VISION 2050*, the *CPPs*, and the *KCCP*. All clearly state that such large commercial developments *not* be sited in the Rural Area. Besides the obvious local concerns, we also are concerned with the general degradation of the protections for the Rural Area, and potential threat to its groundwater and, potentially, surface waters. We, along with ten other Rural Area Organizations, that comprise the Joint Team which the GMVUAC coordinates, have repeatedly expressed such concerns in detailed Comments to the County Executive’s Office during the ongoing *2024 King County Comprehensive Plan (KCCP) Major Update* process, as well as other previous major planning efforts.

2. Proposal: The proposed *commercial facility* in the Rural Area calls for a “*wildlife*” “*glamping*” and “*recreational vehicle park*.” Yet it is *none* of these:

- It is proposed to be located in an existing clearcut with limited opportunities for wildlife interaction or viewing.
- It is proposed to be for high-end camping, i.e., *glamping*. Yet it is located along a busy state highway ~2 mi from the Maple Valley city limits and its extensive urban amenities located at Four Corners—the intersection of two State Highways in southeast King County: SR-169 and SR-516.
- It is proposed to contain 48 rental sites, including 25 Recreational Vehicle (RV) spots plus a lot, lot more, all crammed into a small area. In the long term this “*RV Park*” most likely will *devolve* to a place to park RVs.

To be clear, “*Glamping*” (i.e., *glamorous camping*) is typically characterized by amenities not typically available at a regular campground, such as remote location with exceptional views, that offers special adventure activities, events, and high-end food, usually supported by a large commercial kitchen. The proposal fails in every one of these areas.

3. Rural Forest Focus Area: The proposed *commercial facility* in the Rural Area lies within the *Cedar River / Ravensdale Rural Forest Focus Area (RFFA)*. The *KCCP* includes policies **R-207** and **R-208**, which clearly define what RFFAs are—“*geographic areas where special efforts are necessary and feasible to maintain forest cover and the practice of sustainable forestry*”—and how they are to be maintained—“*in parcels of 20 acres or more in order to retain large, contiguous blocks of rural forest*,” respectively. The proposed project would fail to satisfy *both* of these. Further, approval of the proposed project would set a *precedent* that would pose a significant obstacle to King County and the community’s goals of retaining forestlands, particularly in the *Rural Forest Focus Areas* of southeast King County.

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4. Wellhead Protection Area and Critical Aquifer Recharge Area: The proposed *commercial facility* in the Rural Area, with 48-camping/RV sites serving as much as ~200 people at a time, is within the *Critical Aquifer Recharge Area* impacting both the City of Kent's watershed and the Kent and Covington well-fields. The parcel also is within the City of Kent's *Wellhead Protection Area*, just beyond the shortest (i.e, 1-yr) travel time zone. Consequently, from a *local* perspective, the proposed project represents a large draw on an already-stressed water supply.

5. On-Site Septic System: The proposed *commercial facility* in the Rural Area is to include an OSS, but no design for this *industrial-scale system* has been provided, which leads to many potential questions regarding operation, safety, and contamination. In the SEPA Checklist the applicant states "*sanitary waters will be treated via the proposed on-site septic system.*" However, such a system will require *pre-treatment*, and must be designed to handle RV tank wastes that commonly include chemicals that most OSS are *not* designed to handle. From the available information it also appears a pump system will be required to run the RV dump site wastes through the OSS. The State's GMA requires that groundwater in a *Critical Aquifer Recharge Area* be protected "*by minimizing activities and conditions that pose contamination risks.*" With the applicant's plan for a large OSS and the fully-infiltrated/fully-dispersed stormwater runoff conveyance, coupled with the very high permeability of the soils on this parcel, this clearly would represent a "*potential source of groundwater contamination.*"

6. Transportation: The proposed *commercial facility* in the Rural Area will generate trips far in excess of what is appropriate for the site given the limited "*development rights*" applicable to the site based on prior development history, or even in excess of appropriate trip generation for the underlying zoning as RA-10. In fact, the marketplace feasibility of the proposed project also should be considered, taking into account the very real prospect of future *re-version* to what amounts to a mobile home park, and not only on this parcel, but, potentially, on the adjacent 37-ac parcel as well, since that parcel has the same ownership and also is clearcut wide-open space.

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Recommendations

(in descending order of priority)

1. **Deny Proposed Permit Application:** Based on the rationale contained herein, we recommend the proposed project permit application be denied outright.
2. **Conduct an Environmental Impact Statement (EIS):** Should the proposed project permit application *not* be denied outright, we recommend an EIS be conducted to address the serious *local* environmental concerns cited herein, as well as the *regional* concerns associated with the City of Kent water supply.
3. **Impose Specific Conditions:** Should the proposed project permit application be approved through the use of a Conditional-Use Permit (CUP), again, we point out that *one* of the many criteria given in KC Code **21A.44.040 Conditional use permit. G.** is:

“The conditional use will be supported by adequate public facilities or services and will not adversely affect public services to the surrounding area or conditions can be established to mitigate adverse impacts on such facilities;...”

To build upon this, in the event a CUP *is* issued, we call for many specific Conditions to be imposed and enforced! These would include, *at a minimum*:

- a. Significantly scale back the size of the proposed project;
- b. Mandate the proposed project be operated as a seasonal (i.e., ~6 mo), transient campground with stays limited to no more than 21-days—strictly enforced as such. Should the commercial facility fail to meet this requirement, it should be shut down, abandoned, and dismantled; or sold to someone who can operate it as a true, high-end transient recreational facility;
- c. Require the applicant remove the extensive non-native invasive brush on the “Native Grown Protection Area” and all buffer areas utilizing the existing vegetation; and require on-going management of these areas to avoid *regrowth* of invasives;
- d. Enlarge the property line buffers to at least 130 ft along Kent-Kanglely Rd, at least 100 ft along adjacent designated Forestlands, and at least 50 ft along adjacent Residential lots;
- e. On the Residential lot buffer, require that the vegetation provide effective visual screening of the campground from the neighbors’ properties;

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- f. Provide fencing between the campground and the adjacent neighboring Residential properties to deter campground guests from intruding onto private property;
- g. Require that reasonable quiet hours for the campground be set and enforced;
- h. Re-design the tent and tipi site locations to where campers have to walk no more than 300 ft from their campsite to the nearest restroom, and to the farthest parking spot in the designated parking lot for these campers.
- i. Require the applicant obtain Public Health Seattle/King County approval for the on-site septic system, including the pre-treatment called for in the Septic Feasibility letter, and that the OSS can safely handle RV wastes (including sewer connections and dump);
- j. If traffic generation is observed to exceed the proposed 120 daily trips, or if a change of site usage is proposed that would lead to increased traffic generation, then a traffic-impact study should be required to consider the maximum potential development of the site plus matching development of the adjacent 37-ac parcel as two phases of an ultimate development plan (*); and
- k. Limit signage for the facility along Kent-Kangley Rd to a single, small County Roads-type sign.

() — The traffic study shall account for, at least, the following:*

- *Site-access intersection improvements such as a left-turn pocket or a roundabout;*
- *Improving the north-side shoulder of Kent Kangley Rd from the site to the intersection with 276th Ave SE to include a pedestrian pathway alongside the existing paved shoulder;*
- *Mitigation of traffic impacts on Kent Kangley Rd from the site to the Maple Valley city limits and any other locations of interest to King County; and*
- *Mitigation of traffic impacts in the City of Maple Valley to its satisfaction.*