

**2024 KCCP Major Update
Draft Environmental Impact Statement**

JOINT RURAL AREA TEAM COMMENTS

January 30, 2024

To: Ivan Miller, SEPA Official, King County Office of Performance, Strategy and Budget:
CompPlan.SEPA@kingcounty.gov; CouncilCompPlan@kingcounty.gov

Re: **Public Comment— 2024 KCCP Major Update—Draft Environmental Impact Statement**

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

We have participated in the **Update** since the beginning of 2022 working with KCCP Manager, Chris Jensen. We provided detailed Comments on *Scoping, Conceptual Proposals, Environmental Impact Statement (EIS) Scoping*, and the *Public Review Draft*. We now are completing our in-depth review of the Executive’s “*Recommended Plan*” (ERP).

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* and others further back to the pre-Growth Management Act (GMA) days, when there were no formal KCCPs.

Please note that one of our Joint Team organizations, the *Vashon-Maury Island Community Council (V-MCC)*, due to limitations in its By-Laws, is unable to complete its DEIS review at this early stage and, hence, is *not* included in the approval “*signatures*” below.

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).*

Coordinated by:

Peter Rimbo
primbos@comcast.net
Regional Coordinator, KCCP Updates, GMVUAC

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Coordinator, Joint Team Rural Area Team

Approved by:

LarKen Buchanan
lbuch@outlook.com
"Acting" Chair, GMVUAC

Michael Tanksley
wmtanksley@comcast.net
President, HHA

Nancy Stafford
nancy@go2email.net
Chair, UBCUAC

Andy Bennedetti
andyb929@gmail.com
Chair, GV/LHA

Serena Glover
serena@allenglover.com
Executive Director, FoSV

Greg Wingard
gwingard@earthlink.net
President, GRC

Tim O'Brien
obrien_timothy@hotmail.com
Chair, EPCA

Jeff Guddat
jeffguddat@yahoo.com
President, SCAR

Ken Konigsmark
kenkonigsmark@yahoo.com
Rural Technical Consultant
Growth Management Focal

Mike Birdsall
mike_birdsall@yahoo.com
Rural Technical Consultant
Transportation Focal

Terry Lavender
tmlavender8@gmail.com
Rural Technical Consultant
Environment/Open Space Focal

cc: King County Council, Local Services and Land-Use Committee: kcccomitt@kingcounty.gov
Chris Jensen, King County Comprehensive Plan Manager: chris.jensen@kingcounty.gov
John Taylor, Director, King County Department of Local Services: john.Taylor@kingcounty.gov

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Draft EIS
[Draft Environmental Impact Statement](#)

We understand per **WAC 197-11-442(4)** an EIS for a comprehensive plan calls for a discussion of alternatives that:

“...shall be limited to a general discussion of the impacts of alternate proposals for policies contained in such plans, for land use or shoreline designations, and for implementation measures. The lead agency is not required under SEPA to examine all conceivable policies, designations, or implementation measures but should cover a range of such topics.”

With the above in mind, while we support much of what is described in the **Extensive Change Alternative** considered, such as “Require cities to pay impact fees and implement traffic demand management strategies for large developments that impact unincorporated areas,” we have **highlighted** several concerns, as detailed in the sections below.

EXECUTIVE SUMMARY

p. ES-4:

We have concern with the following statement in that “all unincorporated areas” includes, by definition, the Rural Area:

*“For example, the Extensive Change Alternative would seek to achieve the proposal objectives by **expanding mandatory inclusionary housing** to all unincorporated areas.”*

p. ES-6:

We have concerns with the following as related to greater: (1) Land conversions in the Rural Area and Natural Resource Lands and (2) Urban development in the Rural Area:

“Extensive Change Alternative

*The Extensive Change Alternative includes mandatory programs and requirements to implement more substantial changes related to land use, zoning classifications, and development standards compared to the Limited Change Alternative. The County would be expected to make progress in meeting its objectives to address equity, housing, and climate change and the environment under this alternative to a greater degree than under both the No Action Alternative and Limited Change Alternative. Following are **examples** of potential impacts from the Extensive Change Alternative, whether positive or negative.*

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Natural Environment

In comparison to the Limited Change Alternative, the Extensive Change Alternative would help the County to a greater degree in meeting its greenhouse gas emissions reduction goals and protecting water resources, farmland, critical areas, and natural habitat from development. However, the Extensive Change Alternative could result in a greater conversion of Rural Area and Natural Resource Lands through policies that provide expanded allowances for the development of renewable energy, resorts, or industrial uses than the other alternatives. The Extensive Change Alternative would require, rather than incentivize, active production of farmland in agricultural zones, which could result in greater localized water quality impacts within areas zoned for agriculture as compared to the Limited Change Alternative.

Built Environment

The Extensive Change Alternative includes greater allowances for density and requirements for inclusionary housing than the Limited Change Alternative. It could increase the variety of housing options and lead to development patterns within and closer to existing urban areas and those served by public transit. This would support housing for a broader range of income levels and lead to a more efficient expansion of utility and public services than compared to the Limited Change Alternative. Substantial increases in allowances for temporary and emergency housing would support short-term housing needs, though could necessitate an increase in social service provider staff and resources.

The Extensive Change Alternative would conserve more land as rural through the TDR Program and make more substantive updates to the Four-to-One Program requirements, including changes that are more likely to increase participation. As with the Limited Change Alternative however, the Extensive Change Alternative could alter the geographic pattern of land designated for conservation, including greater urban development within unincorporated rural areas. Tourism, resort, and economic development-oriented buildings would be allowed to a greater degree in the Rural Area, on Natural Resource Lands, and within agricultural zones, which could result in development inconsistent with the existing character of those areas.”

2. PROPOSED ACTION AND ALTERNATIVES

Our comments on the **Table 2.3–1. Alternatives Examples Table** (pp. 2-5 thru 2-21) below only deal with the “*Extensive Change Alternative*” column.

Equity (pp. 2-5 thru 2-8):

(p. 2-5):

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“Reduce housing and business displacement and advance equity for those who are Black, Indigenous, People of Color, immigrants, and/or refugees, especially those who also earn less than 80% of the AMI.”

(p. 2-5): **“Expand inclusionary housing or require mandatory inclusionary housing in all unincorporated areas, including Rural Towns.”**

Climate Change and the Environment (pp. 2-11 thru 2-14):

(p. 2-11 to 2-12):

“Align with and advance the King County 2020 Strategic Climate Action Plan to reduce GHG emissions, support sustainable and resilient communities, and prepare for climate change.”

(p. 2-12): **“Allow additional clearing of trees and vegetation in unincorporated King County, without a permit, for habitable structures and utilities.”**

(p. 2-13 to 2-14):

“Increase the amount of land that is preserved for conservation.”

(p. 2-13): **“Make substantive updates to the Four-to-One program requirements, such as:**

- Using joint planning area boundaries.**
- Allowing for reduced open space ratio.**
- Allowing for noncontiguous open space.**
- Allowing urban-serving facilities in the Rural Area.**
- Allowing nonresidential projects.**
- Allowing projects not likely to be timely annexed.”**

(p. 2-14): **“Modify and expand the TDR program, such as providing bonus TDRs for sending sites that are in the Forest zone or are vacant marine shoreline without bulkheads, allowing TDR sending sites on Vashon–Maury Island, allowing urban open spaces that were previously acquired using conservation futures tax funding or urban separators to become TDR sending sites, removing specific goals for reduction of development potential outside the Urban Area, allowing TDRs to be used for duplex units in the Urban Area and Rural Towns, and allowing for payment into the TDR bank when TDRs are not available.”**

General (pp. 2-14 thru 2-21):

(p. 2-15 to 2-16):

“Address the outcomes of the County Subarea Planning Program.”

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(p. 2-16): *“Make substantive updates to the existing land use designations and zoning classifications in the Snoqualmie Valley/NE King County subarea, such as updating the allowed uses in the Fall City Business District Special District Overlay and removing some conditions to create parity with adjacent properties. For example:*

- *Incentivize agritourism, including options for compatible uses (education, experiences, value-add, processing, sales).*

(p. 2-17 to 2-18):

“Update transportation policies.”

We suggest that all ten items listed under the ***“Extensive Change Alternative”*** column be moved to and replace the comparable ten items under the ***“Limited Change Alternative”*** column, as these all constitute activities we would like to see implemented.

(p. 2-18):

“Improve regulations governing rural and natural resources.”

(p. 2-18): *“Expand SEPA exemptions to the maximum allowed by WAC 197-11-800.”*

(p. 2-18 to 2-21):

“Implement land use designation and zoning classification changes.”

(p. 2-18): *“Allow resorts in additional areas with limited development conditions, beyond the existing permitted use.”*

(p. 2-18): *“Allow for additional material processing uses in additional zones, with limited development conditions.”*

(p. 2-19): *“Make more extensive changes to manufacturing and regional land uses allowed in the Industrial zone and remove the prohibition outside the UGA or revise the uses that require a conditional or special use permit.”*

(p. 2-19): *“Make more extensive changes to development standards in anticipation of new and innovative industrial uses.”*

- *“Encourage rural economic development, rural economic strategies, and tourism in the rural area and on Natural Resource Lands.”*
- *“Encourage agrotourism in the Rural Area, especially where there is the opportunity for compatible uses, such as educational experiences, value-added processing, and sales.”*
- *“Modify the uses permitted in the Rural Area to implement rural economic development goals.”*

(p. 2-19): *“Allow mineral extraction operations with fewer development conditions.”*

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(p. 2-20): "...Consider how mixed-use developments, at an appropriate size and scale, could support rural economic and agritourism opportunities, the number of mixed use developments needed, and what uses would be allowed." **[This is in the "Limited Change Alternative" column.]**

(p. 2-20): "Allow food stores in the Rural Area zone with minimal development conditions."

(p. 2-20): "Make more extensive land use designations and zoning classification changes based on area-wide evaluation of the UGA and permitted densities, such as moving the UGA boundary and/or increasing the density and intensity of use."

(p. 2-21): "Allow for additional industrial zoning classification in the Rural Area and on Natural Resource Lands."