

**Striking Amendment to 2024 King County Comprehensive Plan (Proposed Ordinance 2023-0440)**

***Joint Rural Area Team Proposed Line Amendments to Striker Amendment***

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

***KC Council's LS&L-U Committee Striker Amendment***

***Joint Rural Area Team  
Proposed Line Amendments***

**Submitted May 21, 2024**

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**Striking Amendment S1 to Proposed Ordinance 2024-0440**

Lines 3965 - 3985 (pp. 185-186)  
KCC 21A.04.090  
ZONES, MAPS AND DESIGNATIONS  
Neighborhood business zone

[SECTION 74](#), Ordinance 10870, Section 30, as amended, and K.C.C. 21A.04.090 are hereby amended to read as follows:

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:

**Add back in** the Executive’s phrase **highlighted underlined** as follows:

1. Limiting nonresidential uses to those retail or personal services ~~((which))~~ that can serve the everyday needs of a surrounding urban or rural residential area;
2. Allowing for ~~((mixed use (housing and retail/service)))~~ **mixed-use developments ((and)) in urban areas and rural towns;**
3. ~~Allowing for townhouse developments as a sole use on properties in the urban area with the land use designation of commercial outside of center; and~~
- ~~((3.))~~ **4. Excluding industrial and community/regional business-scaled uses.** B. Use of this zone is appropriate in ~~((urban))~~ unincorporated activity centers, community business centers, neighborhood business centers, commercial outside of centers, rural towns, or rural neighborhood commercial centers designated by the ~~((c))~~ Comprehensive ((p))Plan, on sites ~~((which))~~ that are served at the time of development by adequate public sewers when located in urban areas or adequate on-site sewage disposal when located in rural areas, water supply, roads, and other needed public facilities and services.

Rationale: The phrase “in urban areas and rural towns” was added by the Executive in his 12/7/23 “Recommended Plan” to Council, but is deleted in the Striker. The distinction enumerated by this phrase is important and should be added back in. Such “mixed-use development” has no place in Rural Neighborhood Business Districts. Our requested Line Amendments below (Chapter 3 — Lines 660 - 671 (Redline version, Lines 687 - 698), policy R-302 and Lines 1087 - 1106 (Redline version, Lines 1120 - 1139), policy R-401) are consistent with this rationale.

Lines 5754 - 6179 (pp. 280-302)  
KCC 21A.08.080  
PERMITTED USES  
Manufacturing land uses

[SECTION 152](#), Ordinance 10870, Section 335, as amended, and K.C.C. 21A.08.080 are hereby amended to read as follows: A. Manufacturing land uses.

**Amend** the Use Table to **remove any “Materials Processing Facility” permitted uses in the F zone.** Eliminate the **highlighted** portions of Development Condition 14 as follows :

14. Only on the same lot or same group of lots under common ownership or documented legal control, which includes, but is not limited to, fee simple ownership, a long-term lease, or an easement, and:
  - a. does not include retail sales of processed materials; and:
  - b.(1)** as accessory to a primary mineral use and may only process materials generated from on-site or properties within three miles of the site; or
  - ~~((b.))~~ **(2)** as a continuation of a mineral processing use only for that period to complete delivery of products or projects under contract at the end of mineral extraction.

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**Rationale:** For “Materials Processing Facility” for zones F, M, and RA the Executive made changes in response to our Docket Request (2022, #8). While the “Striker Amendment” has added a Conditional-use permit for the F zone, that does not go far enough. Material processing needs to be better defined, and limited to Agricultural-zoned, and not Forest-zoned areas. There are really no by-product materials from forest lands that need to be processed, aside from the lumber itself. The by-products are from the industrial lumber mill and not the harvesting activities. Agricultural-zoned areas are different, where there are by products taken offsite from farms. Consequently, we suggest the processing of agricultural materials stay close to the source and remain on agricultural-zoned land and be limited to scale to agricultural needs and use consistent with the character of the surrounding land use – as the valid operations would propose. **Allowing material processing in Forest-zoned areas will lead to improper land use, code violations, environmental damage and increased fire risk for the forest and people living there.**

**Amend** the Use Table to **restore “Wood Products” Conditional-use permits in the F and RA zones.**

**Rationale:** For “Wood Products” in the F and RA zones Conditional-use permits should be restored, otherwise it would allow stump grinding and stockpiling activities, such as had been proposed by Enumclaw Recycling Center (located on Franklin Rd north of the City of Enumclaw, just south of the Green River Gorge), and now by same owners site in Ocoola that is now partially permitted because they say they produce a mix of coarse chips of bark and wood that is called “hog fuel.” It would also tend to allow facilities such as Buckley Recycling Center (located in the Rural/Agricultural area just north of the City of Auburn), which, due to well over a decade of litigation between it and King County, the county is well aware of the environmental and other adverse issues of allowing large scale stump grinding, wood waste processing, and stockpiling in agriculturally zoned lands.

**Lines 8499 - 8577 (pp. 423-426)  
KCC 21A.22.060  
DEVELOPMENT STANDARDS - MINERAL EXTRACTION  
Site design standards**

SECTION 185. Ordinance 10870, Section 444, as amended, and K.C.C. 21A.22.060 are hereby amended to read as follows:

Except as otherwise provided in K.C.C. 21A.22.040, in addition to requirements in this title, all uses regulated under this chapter shall comply with the following standards:

**Add** subsection 5. to B. as follows:

**B. On sites larger than twenty acres, activities shall occur in phases to minimize environmental impacts. The size of each phase shall be determined during the review process(;) in accordance with the following:**

**5. Any significant revision of the mining plan or schedule, or ownership, will require the operation to reapply for a permit to conduct mining on the site, including the opening of a Public Comment period. If the revised permit to conduct mining is denied, then the operation must begin reclamation-only activities within one year of such determination.**

**Rationale:**

Thank you for amending subsections **B.1. thru B.4** as per our 2/6/24 Detailed Comments. That said, the original purpose for our 2022 Docket Item was to prevent the typical practice of delaying reclamation by updating mine plans/expansions, and then delaying long enough either to go bankrupt or limit liability by selling site/business to “another” party. A good complement to the above proposed Code changes is to include a statement that major changes in the Reclamation Plan (or Schedule) will require a new application to conduct mining (with accompanying public comment, etc.). The presumption is that such a new application

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is an opportunity to fully review mining on a site like it was a new mine proposal. In fact, **KC Code 21A.22.050** Periodic Review. should apply to reclamation, not just permitted extraction activities.

To be clear, we need stronger protections around this area of mine reclamation/disposal. Currently, under existing Code and how it is interpreted in practice, we are living with the harmful practice of using mining sites, especially former or abandoned mining sites, effectively as waste-disposal facilities where, unfortunately, the standards that are supposed to provide a safeguard are routinely ignored by both the permitting agency and the site owner/operator. This appears to mainly be the case to maximize profits to the site owner/operator. Compounding all of this, is the lack of Periodic Review per Code (also a focus of our 2022 Docket Item), as KC DLS-Permitting simply doesn't have the person-power to do it, as related to us by Jim Chan on 10/26/21: "We have had significant staff turnover tied to this body of work and are working on a plan to back into alignment with new staff."

As a result, we see the need for more opportunities for Public Comment and Review, especially when there is a proposed change of activity and/or ownership. We have seen too many times when either has precipitated unanticipated problems and the Public is the last to know, but is the most affected. Although the existing KC Code 21A.22.060 Site design standards language could be regarded as already containing this requirement, as generally public comment is "required" as part of the permitting process, the requirement isn't explicit. We already know from the debacle around the Reserve Silica in Ravensdale (note: from the start of 2023 we have an ongoing dialogue with KC DLS-Permitting's Deputy Director, Mark Rowe, and Code Enforcement Manager, Thomas Campbell, on this particular site and operation) matter that such changes to permits for these types of properties and situations are done without any public notice, involvement or input. We believe such language is the minimum necessary to address such questionable activities by mine property owners and Permitting.

**Lines 10074 - 10056 (pp. 503-507)  
KCC 21A.30.085**

**DEVELOPMENT STANDARDS - ANIMALS, HOME OCCUPATION, HOME INDUSTRY  
Home Occupations in the A, F and RA zones**

[SECTION 213](#), Ordinance 15606, Section 20, as amended, and K.C.C. 21A.30.085 are hereby amended to read as follows:

In the A, F, and RA zones, residents of a dwelling unit may conduct one or more home occupations as accessory activities, ((under the following provisions)) as follows:

**Amend A.** to include:

**The dwelling unit is the primary residence of the owner and operator of the home occupation business. Attached garages are not considered part of the dwelling unit ground floor area for purposes of the provisions for home occupations.**

Rationale: This clause is designed to put the "Home" back in Home Occupation 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. The sentence on attached garages clarifies what portion of a house may be used for the calculation of total floor area.

**Amend C.2.** and **add** a new **3.** as follows:

**C. Total outdoor area of all home occupations shall be ((permitted)) as follows: ...**

**2. For lots one acre to five acres, one percent of the area of the lot, up to a maximum of two thousand square feet; and**

**3. For lots five acres or greater: One percent of the area of the lot, up to a maximum of five thousand square feet. or greater: One percent of the area of the lot, up to a maximum of five thousand square feet((-));**

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Rationale: Lots under 5 ac tend to be located in neighborhoods which are more residential in character. This provision will reduce the visual intrusion on neighbors and works in harmony with other subsections.

**Lines 10157 - 10200 (pp. 507-509)**

*KCC 21A.30.090*

**DEVELOPMENT STANDARDS - ANIMALS, HOME OCCUPATION, HOME INDUSTRY  
Home Industries**

SECTION 214. Ordinance 10870, Section 537, as amended, and K.C.C. 21A.30.090 are hereby amended to read as follows:

**Add** a new subsection L. as follows:

**L. The dwelling unit is the primary residence of the owner and operator of the home occupation business.**

Rationale: This new subsection is designed to put the "Home" back in 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.

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**Att A--2024 KCCP: Redline--Att A**

[NOTE: Below all line numbers referenced are from *Attachment A* and are shown in **bold**. The corresponding line numbers from the *Redline Version of Attachment A* are shown in (parentheses).]

**Chapter 3—RURAL AREAS AND NATURAL RESOURCE LANDS**

**Lines 660 - 671**  
(Lines 687 - 698)

Eliminate **highlighted** subparagraph **b.**:

**R-302 b. In rural neighborhood commercial centers at low or middle densities that support housing co-located with commercial development, compatible with rural character and service levels;**

Rationale: Identical to that given for policy **R-401**, lines **1235 - 1243** (lines 1272 - 1281) addressed elsewhere herein.

**Lines 784 - 797**  
(Lines 814 - 827)

Why does the “*Striker*” show all the Accessory Dwelling Units (ADUs) language, both preceding text to and policy **R-310**, removed? We have not found the location of suitable replacements. If there are not suitable replacements, we call for this language to be restored.

**Lines 1087 - 1106**  
(Lines 1120 - 1139)

Add the following **highlighted underlining**:

**~~(R-401)~~ R-330 d. ~~((d))~~ Do not **require an urban level of infrastructure** or encourage urban development.**

**~~(R-402)~~ R-331 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.**

Rationale: The above two changes are necessary to be consistent with the stated intent in lines 1116-1118: “*The policies below set forth King County’s general approach to providing services and setting facility standards for the Rural Area and provide guidance for siting those facilities that require Rural Area locations.*” KCCP policies should reflect the clear County direction and goals that only those facilities that *require* a Rural Area location and primarily serve local rural residents can be so located.

**Lines 1127 - 1202**  
(Lines 1160 - 1239)

Either in the policy **R-334** below or in KC Code, such as **21A.06.1014F** or **21A08.080** or elsewhere, **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.*”

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**((R-513)) R-334** Rural Public Infrastructure Maintenance Facilities, and agriculture and forestry product processing should be allowed in the Rural Area. Other new industrial uses in the Rural Area shall be ~~((permitted))~~ allowed only on existing Industrial zoned properties in Rural Towns and ~~((in the designated industrial area adjacent to the Rural Neighborhood Commercial Center of))~~ the Preston Industrial Area.

**Lines 1235 - 1243**  
(Lines 1272 - 1281)

Eliminate **highlighted underlining** subparagraph b.:

**((R-501)) R-401 b. Housing, when part of a mixed-use development that is appropriately sized and scaled to be compatible with rural character.**

Rationale: As described in the text in the “Striker” immediately preceding this Policy, “*The Rural Neighborhood Commercial Center land use designation is used to recognize existing small pockets of commercial development, ... that are too small to provide more than convenience shopping and services to surrounding residents. They generally do not have infrastructure or services such as water supply or sewage disposal systems any different from those serving the surrounding area.*” In addition, allowing mixed-use development, such as multi-family dwellings, in such small pockets, often directly adjacent to RA-2.5, -5, or -10-zoned parcels, is completely incompatible and adds very little housing throughout the Rural Area. We see no purpose served, except to crowd out needed local services, the whole reason for the continued existence of RNCCs. An excellent example of what should not be allowed is the multi-story, multi-family buildings being constructed in the RNCC located at Issaquah-Hobart Road/Cedar Grove Road SE. Our proposed change above is consistent with our Line Amendment to K.C.C. **21A.04.090** (addressed elsewhere herein).

**Lines 1360 - 1364**  
(Lines 1406 - 1410)

We propose the deletion of the final sentence **highlighted** below in the following policy, eliminating the reference to development density in Rural Towns being acceptable to approach that of Cities in the Rural Area.

**((R-506)) R-409** Rural Towns may contain higher-density housing than ~~((permitted))~~ allowed in the surrounding Rural Area, and should provide affordable and resource-worker housing ~~((if utilities and other services permit))~~. **Development density in Rural Towns may approach that achieved in Cities in the Rural Area, when appropriate infrastructure is available.**

Rationale: The development density in Rural Towns should *not* approach that of Cities in the Rural Area. There are, in reality, no effective limits on population centers in the Rural Area. Black Diamond is defined as a “*City in the Rural Area*” and is in the process of *quintupling* its population to over 25,000 residents. Local, as well as nearby State and County roads are already severely overburdened, on occasion with grave consequences. In addition to lack of road capacity, there are deleterious impacts to often-adjacent Agricultural Production Districts, as well as numerous environmental concerns, which include impacts to wildlife as well as cultural and heritage venues. For comparison, the Rural Towns of Carnation and Fall City each have populations of ~2,000, an *order of magnitude* below that low Black Diamond’s planned growth.

**Lines 3525 - 3799**  
(Line 3692 - 3296)

**D. Mineral Resources**

We *re-iterate* the new text and ten new policies we proposed to the committee in our February 6, 2024, Detailed Comments, ([Comments--Exec's "Recmd'd Plan"](#), pp. 24-31) on the Executive's December 7, 2023, “*Recommended Plan.*”



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Rationale: There are many problems associated with extraction of mineral resources in KC. There is little to no Code Enforcement, no code-required 5-yr Periodic Reviews), and Reclamation is a gigantic loophole that becomes bigger when paired with no enforcement. All of this undermines KC’s *relatively* good Code on mineral resource extraction. However, the key to make this work is code enforcement, and behavior of these businesses, i.e. they do not feel they need to comply with the conditions of their permits, shows us that there is little to no code enforcement of industrial and resource extraction in unincorporated King County. Permitting and Code Enforcement also needs to prioritize enforcement of these industrial and mining sites vs. residential properties, as the industrial and mining sites have a much large impact on the environment and community. Ideally, there should be a moratorium placed on new permits or for extending existing/expiring permits until proper code enforcement of these sites can be put in place. One area of code that can be changed to help the situation is to adopt new rules proposed that prevent permit holders from extending permits by simply changing their mining or reclamation plans. Further, permits should be issued for no more than 10 years at a time.

**Chapter 8—TRANSPORTATION**

**I. The Regional Transportation System**

**A. Introduction**

The introduction states two foundational principles that we applaud:

- sound financial management — **Line 23** (Line 26)
- equitable travel opportunities for all people and communities — **Line 44** (Line 47)

But we must lament a lack of follow-through in various areas, despite the several times we have pointed out such shortcomings over the past two years as the draft 2024 KCCP Update was being developed.

We propose the following Line Amendments for Chapter 8 to set the stage for future changes to implement these principles in significant ways.

**B. Public Transportation**

**Lines 1180 - 1182**  
(Lines 1242 - 1244)

Add the **highlighted underlined** words at the end of policy T-201:

**((T-204)) T-201 King County should support local and regional growth plans and policies by focusing transit services on centers and other areas of concentrated activity, and on commuter corridors between cities through the Rural Area and/or Natural Resource Lands.**

**C. Active Transportation**

**after Line 1365**  
(after Line 1299)

Add new **highlighted underlined** text:

**Many roads in the Rural Area were constructed decades ago and did not then provide suitably for active transportation; however, upgrading most roads to a modern standard is not financially feasible in the near future. Transitional road improvements could provide cost-effective benefits sooner by deviating thoughtfully from full design standards at targeted locations.**

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**Lines 1386 -1390**  
(Lines 1458 - 1462)

**Amend** Policy T-218 as follows:

~~((T-240))~~**T-218** The specifications in the King County Road Design and Construction Standards shall **include provisions for Transitional Road Improvements to support active transportation sooner at low cost by deviation from standards. The Transitional Improvement shall be consistent with the following conditions:**

- (a) Alleviates a known safety and/or mobility condition by improving a relatively short segment of road;**
- (b) Has low cost for the benefits obtained;**
- (c) Does not overlap with any road construction project providing similar benefits with funding identified for completion within six years;**
- (d) Does not preclude later conversion to full design standards.**

**D. Transportation Demand Management**

**Lines 1589 - 1595**  
(Lines 1666 - 1672)

Add to policy T-304 the **highlighted underlined** words:

~~((T-210))~~ **T-304** Any capacity increases to rural regional corridors shall be designed to accommodate levels of traffic between urban areas consistent with ~~((the county's adopted))~~ Comprehensive Plan policies regarding development in the surrounding Rural Area or Natural Resource Lands. The ~~((c))~~County shall seek to maximize the efficient use of existing roadway capacity **including support for transit between cities and support for local access movements** before considering adding new capacity to rural regional corridors.

**IV. Roads**

**B. Concurrency**

**Lines 1666 - 1669**  
(Lines 1743 - 1746)

Concurrency is based on the county's "adopted level of service methodology" but this methodology is not defined in the plan, but in the separate concurrency ordinance. Major changes to that methodology are needed. The process of change can be initiated by adding the **highlighted underlined** words to policy T-308:

~~((T-222))~~ **T-308** The concurrency test shall be based on the ~~((L))~~level of ~~((S))~~service on arterials in unincorporated King County using the ~~((c))~~County's adopted methodology **based on the level of service provided to turning movements for local access.** ~~((The test may be applied to designated Highways of Statewide Significance.))~~

**C. Road Services Policies and Priorities**

**Lines 1853 - 1860**  
(Lines 1934 - 1941)

In rural areas the term "local road" must be construed to include some arterials as well, due to the sparse nature of the road system, generally lacking what cities call neighborhood collectors. Modify policy T-320 to add the **highlighted underlined** words:

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~~((T-310))~~**T-320** ~~((State highway facilities and arterial roads are designed to accommodate higher traffic volumes, at higher speeds, than local roads. To protect residential neighborhoods from the impacts of pass-through traffic,))~~ Whenever possible, King County should design and operate roads to direct ~~((such))~~ pass-through traffic away from local roads, **designated heritage corridors, and arterials that provide substantial local access to adjacent areas** and encourage such traffic to use highways or **principal** arterials ~~((whenever possible))~~, which are designed to accommodate higher traffic volumes at higher speeds.

VI. Coordination

A. Regional Coordination

Lines 2020 - 2022  
(Line 2103 - 2105)

Add to policy T-502 the **highlighted underlined** words:

**T-502 King County should promote a multi((-))jurisdictional, multimodal regional corridor approach to reducing congestion and improving efficiency on highways and arterial roads, including a uniform and integrated countywide impact fee program and concurrency standards across all borders.**

Chapter 9—SERVICES, FACILITIES, AND UTILITIES

Lines 659 - 665  
(Lines 686 - 693)

**Amend** Policy T-440

~~((F-270))~~ **F-440** King County should maximize the capacity and lifespan of the Cedar Hills Regional Landfill **and plan for future disposal when Cedar Hills Landfill closes to ensure no gap in service, subject to environmental constraints, relative costs to operate, ((stakeholder)) partner and public interests, and overall solid waste system optimization. The County shall not seek to site a replacement landfill in King County for the Cedar Hills regional landfill.**

as follows:

~~((F-270))~~ **F-440** King County shall close the landfill operations at Cedar Hills Regional Landfill when the 2019 Comprehensive Plan expansion development is completed with no further expansion permitted. A plan for closure and future disposal alternatives will be determined well before the planned closure to ensure no gap in service, subject to environmental constraints, relative costs to operate, partner and public interests, and overall solid waste system optimization. The County shall not seek to site a replacement landfill in King County for the Cedar Hills regional landfill.

**Rationale:**

KCSWD's 2019 Comprehensive Plan meets the requirement of maximizing the capacity by using all available footprint space and safely going to heights allowable by engineering, so no further mandate to maximize should be forced upon KCSWD or members of the Public. Alternative 2 will extend the life to approximately 2038 and will be at full capacity with no further expansion available. The only way to substantially increase capacity and lifespan of the landfill is to violate the original Special-Use Permit and expand into the 1000-ft buffer, which should never be considered. Pat McLaughlin and John Walsh have assured us that *further* expansion is no longer an option. Because of this, policy **F-440** should no longer be about maximizing the capacity, rather it should be directing the KCSWD to plan for the final closure of the landfill after its 2019 Comprehensive Plan expansion is complete and to commit to a future disposal alternative now. Because KCSWD says it will take 10-12 years to

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fully implement a new disposal method, this policy should require them to make a decision now so there is no gap in service when the landfill is full after implementation of its current plan.

For KC to demand it expand further is irresponsible and, frankly, a betrayal to members of the Public and promises KC has made to them. KC needs to realize the landfill will be at capacity and needs to fully close, so the policy needs to ensure KCSWD puts its efforts into finding and implementing a new disposal method rather than trying to eke out a couple more years of capacity that really is just not there.

Recent issues have made it clear the landfill is becoming too large for KCSWD to efficiently and safely manage. Gas collection pipes are failing, requiring 70 more vertical collection pipes to be installed over the next 2 years, while excess Methane has been leaking into the atmosphere because of the failures. A large Methane plume that exceeds what KC is reporting to the EPA has been detected on multiple scientific flyovers. This certainly doesn't fit with KC's environmental goals. Arsenic is a problem and has been for a number of years, resulting in excessive levels going to the Wastewater Treatment Plant and into our waterways, as well as into the atmosphere. BEW is no longer taking the landfill gas, so it is being flared, further putting the environment and members of the Public at risk from the excess Arsenic, for which atmospheric testing is not required. Frankly, Cedar Hills is a Superfund site waiting to happen. The list goes on.

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**Att D--App C--Transportation Redline--Att D**

**COMMENTS FOR CONSIDERATION BY THE KC COUNCIL (not Line Amendments)**

In order for the Comprehensive Plan to work as an effective guide to the county's work program for the next ten years, much more information needs to be expressly present here. Most users of the Comprehensive Plan expect to find explicit information and guidance, not a link to another website that provides information created by others in a different context and not directly addressing the plan's actual policy issues.

Hoping for a better outcome in the final version when adopted, we are re-submitting hereafter the same comments we provided last summer, updated with more clarifications and specific recommendations and examples. There is an overarching need for King County to chart a new direction for managing its transportation resources. We think that better compliance with the Growth Management Act provides a good foundation of information to build on.

GMA anticipates the presentation of existing and future needs in a consistent manner, with analysis to show how future growth will be managed, balancing future needs with financial resources and level of service standards. To be perfectly clear, the pattern is:

- A. Existing conditions (supply and demand)
- B. Future conditions with growth (supply and demand)
- C. Future deficiencies (vs. level of service standards)
- D. Financial analysis (financial supply and demand)
- E. Revisions to the Comprehensive Plan to achieve financial balance

Transportation plans in many jurisdictions are long on technical minutia and short on sensible high-level summaries that the public and elected officials alike can grasp and evaluate. But the fault may lie with the *tools of measurement* as much as any lack of effort. We encourage King County to explore ways to evaluate transportation systems with less attention to complex tools of traffic engineering and more use of tools that require only a spreadsheet to tote up a series of parts that make the whole.

We recommend specifically, where roads are concerned, that an inventory of system usage be compiled in terms of vehicle-miles of travel (VMT) and system supply in similar terms as capacity-miles. That is a measure quite similar to the direction the state is taking for a future road user charge based on VMT that will replace the outmoded and failing gas tax as its main revenue base. The VMT method is simple to use for inventory and analysis of a large road system, in a spreadsheet. This is much easier than the complex analysis tools that traffic engineers use to evaluate road conditions one location at a time. The implementation of GMA in the 1990's innocently went the direction of traffic engineering, despite some early warnings against it. Time has shown that approach was a big waste of time and energy as far as system planning is concerned. The issue of growth management is a macro-level problem and needs macro-level tools for management purposes. The VMT concept satisfies that need. Ironically, even traffic engineers have historically used VMT when making high-level reports to policy makers. See for example the Highway Performance Monitoring System reports annually submitted by WSDOT to the Federal Highway Administration)

For other modes similar approaches can be worked out. Transit supply and demand for a system is commonly described by bus-miles, seat-miles, and passenger-miles. Air travel for a system is also summarized in mileage-based terms.

Recent state legislation now requires local comprehensive plans to be multi-modal in scope (see RCW 36.70A.070(6) (A)), with multi-modal level of service standards. What we propose meets that need. But there is no effort made in this draft plan to provide multi-modal level of service measures, standards, nor analysis of future needs on that basis. That is a major deficiency.

To support the policy changes we recommended in the body of Chapter 8, supporting materials in Appendix C – Transportation need to be updated or expanded. More attention is needed in the three topical areas of interest we suggested for Chapter 8: (1) Needs of unincorporated areas are neglected; (2) City-to-city traffic uses rural roads excessively; and (3) Financial system for county roads is broken.

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**Att A--App C1--TNR Redline--Att E**

**COMMENTS FOR CONSIDERATION BY THE KC COUNCIL (not *Line Amendments*)**

This Appendix provides an exhaustive inventory of roads and projected needs based on maintenance and asset management criteria, rather than GMA-oriented service needs. Also the approach is only countywide, not accounting for Community Service Areas nor rural and urban distinctions within the unincorporated area. It also 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 based on an ultimate future condition. This foundational list needs some discussion of when and why each improvement will be needed, to relate it to GMA.

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 hard decisions needed to justify future road closures due to lack of funding.

*Joint Rural Area Team Proposed Line Amendments to Striker Amendment*

**Att I--Land Use & Zoning Map Amendments Redline--Att I**

**Line 2186 and beyond**

Please add the following *new* **Map Amendment**:

*Map Amendment XX: Countywide – P-Suffix Zoning / Development Conditions — AMENDMENT TO THE KING COUNTY ZONING ATLAS — ZONING*

1. Remove P-Suffix zoning (EN-P01, FC-P02, SV-P37, SV-P037, SV-P11, SV-P12, SV-P13, SV-P15, SV-P17, SV-P18, SV-P19, SV-P20, SV-P21, SV-P25, SV-P26, SV-P28, TR-P09, TR-P21, TR-P22) for commercial, industrial or mining activities in the Rural Area of unincorporated King County, if the condition is not currently met and remains out of compliance for one year, then zoning reverts back to underlying/original (non-commercial) zoning. Further if the ownership changes the uses would revert to underlying zoning.
2. Repeal P-Suffix Development Conditions EN-P01, ES-P04, FC-P02, GR-P04, GR-P03, GR-P02, GR-P01, SV-P37, SV-P037, SV-P11, SV-P12, SV-P13, SV-P15, SV-P17, SV-P18, SV-P19, SV-P20, SV-P21, SV-P25, SV-P26, SV-P28, TR-P09, TR-P21, TR-P22 from Zoning Atlas.

**Rationale:** Most of these P-Suffix development conditions are many years out of date. This would allow parcels that do not meet the commercial development conditions to revert back to underlying zoning for more clarity and transparency in zoning, provide more land for additional housing units, reduce impact of and cost to regulate commercial business in the Rural Area and restore Rural Character and help improve tourism and more sustainable economic development in the Rural Area. **We have discussed this with KC DLS-Permitting and they agree that many P-Suffix development conditions are years out of date.**

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