

**2024 KCCP Major Ten-Year Update**  
**JOINT RURAL TEAM WRITTEN TESTIMONY**

December 5, 2024

To: **King County Council:** [CouncilCompPlan@kingcounty.gov](mailto:CouncilCompPlan@kingcounty.gov)

Re: **Written Testimony— 2024 KCCP Major Major Ten-Year Update**

Please accept *Comments* herein on the subject **2024 King County Comprehensive Plan (KCCP) Major Ten-Year Update (Update)** from the Joint Rural Team comprising of rural organizations throughout King County (\*).

Due to its paramount importance we have enthusiastically participated in the subject *Update* since January 2022 working with the King County Executive's Office, primarily through KCCP Manager, Chris Jensen, and with the King County Council's Local Services and Land-Use (LS&L-U) Committee, Chaired by Councilmember Sarah Perry. We also have engaged directly with each of you and/or your staffs. Throughout the entire process we have reviewed all documents, submitted multiple sets of Written Comments, and offered nearly 40 Oral Testimonies to the Council or the LS&L-U Committee. As we all approach the "*finish line*," we respectfully offer our final Written Testimony herein.

We begin with the basis for comprehensive planning in the state of WA, the Growth Management Act (GMA). Attached please find our "*Rural Protection Addressed at Every Level of Planning*" chart. It starts with some key GMA provisions, which flow down to some key PSRC *VISION 2050* policies, then to some key Countywide Planning Policies (CPPs), and finally to some key KCCP policies (note KCCP policy numbers shown correspond to the *existing* KCCP) and accompanying King County Code. Clearly, *every* level of planning provides specific protection of rural lands from sprawl, environmental degradation, and extension of urban infrastructure.

As we have expressed in several of our recent Oral Testimonies, we fear the *Update* could be at risk of possible rejection for Certification by the PSRC Growth Management Planning Board based on *internal inconsistencies* among its various Elements, including the Rural Element, Transportation Element, etc., thus violating GMA requirements for Comprehensive Plans and, thus, denying King County of *any* opportunity for Federal Highway monies managed and allocated by PSRC—the official designated regional, planning authority.

Below we offer seven areas (**JRT-1** thru **JRT-7**, with JRT meaning "*Joint Rural Team*") with proposed Line Amendments for each (in no particular order of priority), while providing a very brief explanation. For detailed Policy and Code language changes please see the attached "*Joint Rural Team Proposed Line Amendments to KC Council*" matrix.

**JRT-1 — Rural Neighborhood Commercial Centers** — Focus on business uses.

**JRT-2 — Agricultural & Forestry Product Processing** — Focus on processing local products.

**JRT-3 — Home Occupations & Industries** — Put the "*home*" back into such uses.

**JRT-4 — Materials Processing Facilities** — Limit to agriculture-, not forest-zoned areas.

**JRT-5 — Mineral Extraction — Site Design Standards** — Mining plan revisions.

**JRT-6 — TUPs & CUPs** — Urban-serving facilities & Event Centers should not be sited in Rural Area.

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**JRT-7 — Mineral Resource Policies** — Never-ending Reclamation; Dire need for Periodic Reviews.

During 2024 we also proposed to the LS&L-U Committee two other key areas for Line Amendments, but we consider each of those to be long-term, major efforts that should be worked off-line from the current *Update*:

**JRT-X — Cedar Hills Regional Landfill (CHRLF) Closure** — Following completion of 2019 Solid Waste Management Plan.

**JRT-Y — Transportation** — Concurrency; Road Services Policies & Priorities; and Regional Coordination.

We believe our proposed Line Amendments to both KCCP Policy and King County Code, as well as those offered by both Futurewise and the King County Executive's Office, would significantly improve the *Update* and provide more *internal consistency* in line with GMA requirements, as well as PSRC's *VISION 2050* and *Countywide Planning Policies*. We strongly urge you to consider them.

Please contact us should any questions arise while reviewing 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 Rural Technical Consultants: Mike Birdsall, Transportation; Susan Boundy-Sanders, Government Policy; Ken Konigsmark, Growth Management; and Terry Lavender, Environment.*

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