

August 3, 2026

To: Erin Auzins, Regional Planning Lead: eauzins@kingcounty.gov

Re: **Public Comment—KCCP 2029 Mid-Point 5-Year Update—Scoping**

Ms. Auzins,

Please accept the *Scoping* comments herein from our Joint Team of fourteen King County Rural and Urban Unincorporated Area Organizations—Enumclaw Plateau Community Association (EPCA), Fairwood Community Group (FCG), Four Creeks Unincorporated Area Council (FCUAC), Friends of Sammamish Valley (FoSV), Greater Maple Valley Unincorporated Area Council (GMVUAC), Green River Coalition (GRC), Green Valley/Lake Holm Association (GV/LHA), Hollywood Hills Association (HHA), North Highline Unincorporated Area Council (NHUAC), Skyway Coalition (SC), Soos Creek Area Response (SCAR), Upper Bear Creek Unincorporated Area Council (UBCUAC), Vashon-Maury Island Community Council (V-MICC), and West Hill Community Association (WHCA).

We endeavor to review, consult, and develop solutions on issues of interest to people who live in a wide expanse of King County's rural and urban unincorporated areas. Each of our organizations considers its work on the King County Comprehensive Plan (KCCP) as one of its most important duties in meeting our responsibilities to the people who live in our territories.

Contained herein please find a set of *Scoping* comments (in **bold red**) on the subject Scope of Work released by King County on the July 13, 2026. We also have included some questions (in **[bracketed bold red]**).

We encourage you to please consider our comments in your continuing work as you proceed on the subject Update. We wish to continue an open dialogue with you on the **KCCP 2029 Mid-Point 5-Year Update**. Thank you.

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PUBLIC REVIEW DRAFT

2029 Midpoint Update to the 2024 King County Comprehensive Plan Scope of Work

July 13, 2026

Joint Team Comments (in bold red) — August 3, 2026

The 2029 King County Comprehensive Plan Midpoint Update (2029 Midpoint Update) is an opportunity to make certain substantive policy changes that address our community's long-term needs and advance the County's policy goals.

This document sets the scope of work for the 2029 Midpoint Update, as required for midpoint Comprehensive Plan updates by King County Code 20.18.030. The scope of work will guide the development of the 2029 Midpoint Update. The scope of work will also inform the environmental review and public participation plans for the 2029 Midpoint Update.

The County will complete an equity impact analysis of the proposed update, prior to adoption.

A. Topical Areas for the 2029 Midpoint Update

This section includes the list of scoping topics that will be considered as part of the 2029 Midpoint Update. The list is organized according to the three focus areas – Climate Change and Resiliency, Shorelines, and Housing – as well as other general changes. Within each focus area there are possible topics that might be included in the 2029 Midpoint Update, pending additional analysis and available resources.

The scoping list reflects key topics and issues resulting from collaboration with County staff, the Equity Advisory Cabinet, public review, [past Docket reports](#), and Council consultation.

Unlike the 10-year Growth Management Act periodic updates, additional topics and/or issues not on this list may not be considered as part of the 2029 Midpoint Update, unless they are allowed during an annual update to the Comprehensive Plan.

I. Focus Area: Climate Change & Resiliency

- A. Implementation of [House Bill 1181](#) and associated rulemaking, to establish a climate change and resiliency element in the Comprehensive Plan. House Bill 1181 includes many components, including, but not limited to: **We believe this is a very good list, but have added some specific comments.**

- 1. Establishing a climate change and resiliency element within the Comprehensive Plan. This could include identifying and updating policies in existing chapters, or establishing a new climate change and resiliency chapter in the Comprehensive Plan.

2. Reducing per capita vehicle miles traveled, establishing a multimodal forecast demand and level of service, establishing a transit level of service in urban areas, inventorying active transportation facilities (which has an expanded definition that will require changes to the Comprehensive Plan and Code), providing for equitable state and local transportation needs, and Americans with Disabilities Act transition plan to address deficiencies in obstacles to access transportation system, establishing an active transportation plan. These changes may require an update to Appendices C, C1, and/or C2. **We applaud these steps, and further support adopting vehicle miles traveled (VMT) as the basis for all traffic-impact analysis in lieu of speed and capacity measures (as California and other states have already done) to better align land-use decisions with transportation system performance. This could eventually lead to regional adoption of the same measures. See <http://gmvuac.org/wp/wp-content/uploads/2024/02/KC-Execs-Recomd-Plan-Detailed-Comments-2-6-24.pdf> starting at p. 41 and starting at p. 76.**
3. Reducing greenhouse gas emissions in land use and transportation.
4. Evaluation of urban tree canopy and enhancing natural areas.
5. Reducing risk posed by wildfires. **We believe this needs more specification so as not to be interpreted as a call to develop in protected forest areas. A possible rewording is: "Reducing risk posed by wildfires by supporting the needs of rural fire departments and those in unincorporated parts of King County, requiring ongoing oversight of development (e.g., housing, mining, etc.) in and near forested areas, and maintain existing rural roadways near forested regions."**
6. Inventorying green infrastructure.
7. Identifying public facilities and utility systems owned by other governmental entities. This may require updates to Appendix A.
8. Enhancing community resiliency and addressing natural hazards created or aggravated by climate change.
9. Advancing environmental justice and avoiding creating or worsening environmental health disparities, prioritizing reductions in greenhouse gas emissions and vehicle miles traveled that benefit overburdened communities, and prioritizing resiliency actions that benefit overburdened communities that will disproportionately suffer from compounding environmental impacts and will be most impacted by natural hazards due to climate change.
10. Community engagement with vulnerable populations and frontline communities.
11. Updating the best available science report to comply with the climate change and resiliency requirements.
12. Updating the Flood Management Plan to consider climate change impacts including the impact of sea level rise and increased storm severity (primarily completed with the 2024 Flood Management Plan).

13. Requiring large water system plans to include a climate resilience element **including taking into account both short- and long-term drought scenarios** (primarily a state function). **[Why is this “primarily a state function”? Does the State pay for such resilience programs?]**

14. Planning and investing in necessary maintenance of infrastructure affected by increased extreme precipitation events that pose flooding risk. Examples include culverts, bridges, size and locations of stormwater facilities.

- B. Integrate urban forest and tree canopy considerations into existing policies and lead-in text, as they relate to climate resilience, stormwater, heat-island reduction, quality housing, improved air quality, and health equity. The proposed updates would consider new policy to advance urban forestry program goals and broadly strengthen existing policy with references to promote tree protections and canopy improvements that mitigate heat, improve stormwater retention, and support equitable health and environmental conditions in urban areas of King County. This work will be coordinated with the HB 1181 requirements for urban tree canopy listed above. **We strongly support these efforts and look forward to the Policy discussions to come.**
- C. Updates to align the Comprehensive Plan with the 2025 Strategic Climate Action Plan.
- D. Revise the definition for ‘climate-adaptive plants’ in the Comprehensive Plan and Code, and ensure the use of the term throughout policy, lead-in text, and Code is correct and consistent.

II. Focus Area: Shoreline Master Program Updates

- A. Adoption of the periodic update to the Shoreline Master Program required under RCW 90.58.080. At a minimum this includes review of sea level rise and increased storm severity. The scope of the Shoreline Master Program update will be governed by updates to Department of Ecology rulemaking that is expected to be completed in March 2027.
- B. Updates to critical area regulations within the shoreline jurisdiction. As part of this work, a new Shoreline Code, separate from Title 21A, may be required.
- C. Map amendments to Shoreline Environmental Designations to align with 2020 Flood Maps and current conditions.
- D. Updates to streamline habitat restoration project permitting and review across the Shoreline Master Program, flood regulations, and critical area regulations.

III. Focus Area: Housing [We wish to be part of this discussion going forward on Policy and/or Code changes or additions.]

- A. Potential updates to affordable housing policies to reflect outcomes of the housing revenue workgroup and potential levy identified by [Executive Order ACO-8-34-EQ](#), also known as the “Breaking the Cycle” Executive Order.
- B. Updates to ensure compliance with [House Bill 2266](#), the STEP housing bill.
- C. Housing needs reconciliation of unincorporated King County growth targets after jurisdiction changes through the reconciliation process of 2024 Comprehensive Plan.

- D. Many of the Urban Unincorporated Areas have failing infrastructure, yet are undergoing a quite a bit of upzoning to high-rise buildings, plus a continued concentration of low-income and affordable housing—again with little infrastructure improvements. For example, KC road design standards are *exclusively* rural-oriented and lack provisions to match adjacent cities’ urban street standards, such as including sidewalks rather than shoulders. Often, these properties are tax exempt with no property taxes collected for local schools and local Fire Districts.

IV. General Updates

- A. Changes to align with case law or state law or regulatory updates that are necessary to be completed prior to the 2034 Comprehensive Plan update.
- B. Changes necessary to implement the results of the Permitting Advisory Panel. **[What is this and can the Public participate ?]**
- C. Amendments to the subarea planning program, requirements, and schedule to:
1. Maximize community engagement;
 2. Produce plans that reflect community priorities;
 3. Streamline or remove low-value requirements;
 4. Better integrate with other programs;
 5. Potentially accelerate the schedule (currently extending to 2035) **We strongly agree with this goal;** and
 6. Continue essential land use and zoning updates tied to subarea plans.
- D. Potential clarifying updates to Policies R-759, R-760, R-761, and/or R-762, related to removal of, and mitigation for, land from Agricultural Production District for public services and utilities. **We are concerned that these four Policies already are *relatively* weak, based on how they are interpreted and implemented, related to removal, of lands from APDs. Further, we caution that the *exception* for removal of land from one APD and replacement in another APD should *only* be exercised by a governmental entity for purposes of public/resource benefit or for essential utility needs and should not be used by private entities (individuals or non-utility businesses) for any purposes that would enable increased development on APD lands. This stipulation is particularly important to protect the APDs under the most risk of urbanization such as Lower Green Valley and Sammamish Valley.**
- E. Updates to policies and/or regulations related to the minimum lot area for rural public infrastructure facilities. This is primarily related to the Road Services Division Facilities Strategic Plan update that is expected to be completed in 2027. Roads maintenance facilities may not need to occupy 10 acres of land for operational purposes, and requiring a 10-acre minimum lot area **could** increase the operating costs for the Road Services Division’s maintenance facilities.

- F. Updates to the North Highline Design Standards to resolve conflicts between the Design Standards and the King County Road Design and Construction Standards, including driveway widths for commercial development and primary access on alleys. **Similar concerns may exist with community plans in other Community Service Areas. In addition, the Transportation Element should be updated to account for known transportation system needs in several urban areas (notably North Highline, Skyway, and Fairwood). Local roads there frequently lack sidewalks and other expected urban design elements, and need exists to better regulate high volumes of commuter traffic through the areas coming from outlying cities and destined for urban core cities (e.g., with roundabouts, signal improvements, and sidewalks or other active transportation facilities). With the recent enactment by the KC Transportation District of a sales tax increase to fund countywide transportation improvements, a small portion of that revenue source should be prioritized in the Roads Division Strategic Plan to funding such projects. This will address the issue of *through traffic* in unincorporated areas and provide consistency between the Strategic Plan and the Comprehensive Plan’s guidance for multi-modal transportation services.**
- G. Review and update policies and regulations related to data centers.
- H. Updates to reflect timing inconsistencies between development proposals and provision of public facilities and/or utilities, to encourage stronger collaboration among Public Health, utility service providers, and local permitting authorities.
- I. Changes to surface water management to policies and/or Code.
- J. Updates related to Comprehensive Plan Work Plan Actions including:
1. Action 2: Comprehensive Plan Public Participation Code Update
 2. Action 5: Vashon-Maury Island Coastal Hazard Vulnerability Assessment and Response Plan
 3. Action 6: Wildfire Risk Assessment
 4. Action 7: Rural Economic Strategies Update
 5. Action 8: Communication Facilities Code Update
 6. Action 16: State Environmental Policy Act (SEPA) Categorical Exemptions
- K. As necessary, updates to reflect federal designation of Opportunity Zones in unincorporated King County. **An area of White Center was designated as an Opportunity Zone, which would entice developers to invest in the area with special tax breaks. However, there has been little to no interest from developers at this time.**
- L. Updates to align the Comprehensive Plan with any changes made to Countywide Planning Policies, including changes related to countywide and regional centers. **Although this is standard procedure, care must be taken to ensure updates to both the KCCP and the CPPs are *coordinated*, especially since they are on different timing cycles. Also, *coordination* must be made with the Puget Sound Regional Council (PSRC) and its Regional Centers Program.**

- M. Changes to reflect any annexations that occur before 2029.
- N. Updates to align the Comprehensive Plan with the Open Space Plan: Parks, Trails, and Natural Areas, scheduled for update in 2028, including updates to policies, land use designations, and implementing codes, including open space-related code updates for traffic, parking, facilities, and land management categories.
- O. Updates to align the Comprehensive Plan and any development regulations with changes made in other functional or related planning documents, such as the Road Services Division Facilities Strategic Plan, **Road Design Standards, and Transportation Needs Report**, or the Flood Code update. **Update the Transportation Element of the Comprehensive Plan to align with the Land Use Element as required by the state Growth Management Act (see related 2024 testimony of the Joint Team of rural organizations to the Local Services Committee, <http://gmvuac.org/wp/wp-content/uploads/2024/02/KC-Execs-Recomd-Plan-Detailed-Comments-2-6-24.pdf> - starting at p. 41 and starting at p. 76). In addition, reconsider plan amendments proposed in 2024 by the Joint Team (<http://gmvuac.org/wp/wp-content/uploads/2024/05/Striker-Assessment.pdf> - especially transportation pp. 9-11). Since the preservation of bridges is of extreme importance to the road system, also consider enacting a level of service (LOS) standard for bridges and culverts.**
- P. Updates recommended for inclusion in the 2029 Midpoint Update in future docket reports. **We understand this is a placeholder that anticipates the 2027 (Docket Requests submitted in 2026) and 2028 (Docket Requests submitted in 2027) Docket Reports might provide some items that could be considered in preparation of the Mid-Point Update. We support these opportunities for public participation.**
- Q. Land use and area zoning studies:
1. Review land use designations and implementing zoning on parcels 1421049025 and 1421049023, and the surrounding area including the other R-1 zoned parcels in this area; to consider changing the land use designation “from urban residential, low” to “urban residential, medium,” and zoning from R-1 (Urban Residential, one dwelling unit per acre) to R-4 (Urban Residential, one dwelling unit per acre). This review will include, at a minimum, review of existing site conditions, consistency with adopted policies, coordination with the City of Federal Way, and community engagement. This is related to a 2025 docket item.
 2. Review land use designations and implementing zoning on parcels 1021049012, 1021049065, and 1521049173, and the surrounding area; to consider changing the land use designation from “neighborhood business center” to “urban residential, high”, and zoning from R-18 (Urban Residential, 18 dwelling units per acre) and NB (Neighborhood Business) to R-48 (Urban Residential, 48 dwelling units per acre). This review will include, at a minimum, review of existing site conditions, consistency with adopted policies, coordination with the City of Federal Way, and community engagement. This is related to a 2025 docket item.
 3. Review and potential amendment of ES-P20: Wildlife Corridor/Urban Separator, and land use designation and zoning classifications, for approximately 70 parcels in

unincorporated Sammamish. This is related to a 2026 docket item. **[What is this, as we have no access to "2026" Docket Requests ?]**

4. Correct land use and zoning maps that identify certain parcels with "potential M" (mineral) zoning that contain Category 1 Critical Aquifer Recharge Areas and where those regulations prevent mineral related uses, and where a parcel has been acquired for conservation purposes.
5. Review and update to Urban Growth Area boundary where the boundary currently divides parcels, to include parcels either entirely within or entirely outside the Urban Growth Area.

R. Additional items that were denied in the 2026 Docket Report: In response to the KC Executive's Team's assessment in the 2026 Docket Report regarding our 2025 Docket requests, we provide additional clarity below to address each concern raised.

1. **Amend Rural Neighborhood Commercial Center (RNCC) policy / code to prohibit workforce housing.**

The currently adopted KCCP includes Policies and Code language related to Rural Neighborhood Commercial Centers (RNCCs) in the Rural Area that allows dense "*workforce housing*." This language is flawed in that it is inconsistent with Rural Area policies elsewhere in the KCCP. It is one of many unintended and irreversible consequences of using a broad brush approach that impinges on integrity of the Rural Area.

The "*RNCC*" designation is for local small businesses that serve Rural Area residents, not for "*workforce housing*." Such housing placed in rural settings, not only displaces needed local small businesses and the services they provide local rural neighborhoods, but also is not "*affordable*" as there is little to no infrastructure—no transit, limited one-lane-each-way County roads, no sewers, no water, etc. The KC Executive, at the time, was correct in calling for the elimination of all such residential density in RNCCs, as detailed in his December 2023 "*Recommended Plan*:"

"The range of uses allowed on lands with the Rural Neighborhood Commercial Center land use designation shall be scaled to be small businesses that provide convenience shopping and services for surrounding Rural Area and Natural Resource land residents, such as retail, community and human services, and personal services."

To be consistent with the State's *Growth Management Act (GMA)*, PSRC's *VISION 2050*, King County's *Countywide Planning Policies (CPPs)*, and other portions of the *KCCP* there should be no dense housing located or allowed in the Rural Area.

There are few RNCCs and KC has stated no more are needed, with which we agree, but they shouldn't be filled up with housing—pushing out future small businesses. RNCCs must be allowed to continue to provide small business services to local Rural area residents, not encumbered by dense housing.

In the 2026 Docket Report the KC Executive stated this "*is eligible, but not recommended for consideration in the 2029 midpoint update*" and that we did not identify new information that would warrant making this change now, and thus it did not need to be addressed before the next 10-year update in 2034.

Unfortunately, we only *indirectly* alluded to the 2017 debacle at the Issaquah-Hobart Rd/Cedar Rd intersection. That example clearly shows that RNCCs should be for local small businesses as originally intended. The developer's business case for such housing fell apart with the "*housing*" that was built mostly unfilled after many years and empty foundations remaining unbuilt upon, presumably due to lack of demand at the prices that were/are being charged.

This would affect KC Code Title 21A.04.090 Neighborhood business zone and KCCP Policies R-303 and R-401.

Please refer to the Joint Team's 2025 Docket Request and its extensive supporting information.

2. Amend Agriculture and Forestry Product Processing in Rural Area Policy and KC Code to require materials be grown in KC to eliminate secondary processing facilities in the Rural Area.

Agricultural and Forest Processing Facilities should only be permitted if they have some direct connection to retaining and enhancing agricultural / forest opportunities in KC.

Our agriculture and forest products lands exist almost entirely in the Rural areas of King County. The raw materials from these activities require processing, but if we are to protect the basic resource lands as well as our Rural areas in general, processing facilities in our Rural areas must be limited to those that meet clear definitions of what constitutes primary processing as opposed to secondary processing activities. Secondary or manufacturing enterprises should be sited in appropriately zoned Urban areas.

Along with clear activity definitions, we need product sourcing criteria that make sure only local raw materials are being processed in facilities in our Rural areas.

Examples of primary processing of agricultural products might include washing, sorting, refrigeration, boxing, etc. Secondary processing (manufacturing) might include activities such as mills, bakeries, WBDs, canning, etc. Examples of primary processing of forest products might include sawmills producing basic lumber. Examples of secondary production would include activities such as producing plywood & particleboard, engineered structural members, pulp mills, furniture manufacturing, etc.

Local sourcing also needs clarification. While raw materials from King County should meet local sourcing criteria, consideration might be extended to Snohomish and Pierce Counties, but no further. Raw materials from Eastern WA should, by all means, not be deemed to meet *local* sourcing criteria for primary processing in our Rural areas. We should never allow any imported or Eastern WA products, like grapes or wine, to be trucked into KC for "*secondary processing*" by simply bottling the wine or using grapes grown far away that have no local connection or benefit. Doing so only enables "*industrial facilities*" on rural lands to take imported products and process imports into manufactured goods in violation of the State's Growth Management Act and several KCCP Policies including R-324 ("*Nonresidential uses in the Rural Area shall be sited, sized, and landscaped to complement rural character, prevent impacts to the environment, and function with rural services, including on-site wastewater disposal.*"). That is not benefitting the RA or F zone at all, it is only for private

gain on less expensive land. Another example would be that we should never allow Eastern WA potatoes to be imported to KC to a factory built on rural lands to produce Tim's Chips. This would affect KCCP Policies R-336 and R-337.

If there IS some linkage to benefitting KC, such as forest products from Snohomish or Pierce Counties coming to a mill in KC that keeps the mill operating then that is good. But there needs to be a direct linkage and benefit to KC goals to sustain forestry in KC before allowing any such facilities to operate within KC and especially on rural lands. KC zoning code defines "*Forest product sales*" (used in Title 21A.08.070 Retail land uses), but not "*Forest products*"– the term that is relevant in KCCP Policy R-337. Defining "*Forest products*" expands the usefulness of the term, not just to sales, but also to production and processing. Our proposed solution is to replace the definition for "*Forest product sales*" with "*Forest products*" in KC Code Title 21A.06.525.

Please refer to the Joint Team's 2025 Docket Request and its extensive supporting information.

3. Amend Mineral Operations 5-Year Periodic Review Policy and Code to include Mining Reclamation phases where authority has been granted to KC by the State.

As defined by KC Code Titles 16.82 Definitions, T.: "*Reclamation*"

"...means the final grading and restoration of a site to establish the vegetative cover, soil surface water, and groundwater conditions appropriate to accommodate and sustain all allowed uses of the proposed zone appropriate for the site."

Reclamation of mining sites should be part of Periodic Reviews conducted by the KC Department of Local Services, Permitting Division. In fact, such reviews should be conducted until reclamation is complete and the site is returned to forestry or other end-use as required by law.

Clearly, reclamation is a critical component of every mineral extraction permit. While the actual extraction may have been completed, the job is not finished, nor the mining permit completed, until such time as all aspects of the proscribed reclamation have been completed and approved. To terminate the mandated periodic reviews prior to completion and approval of the mandated reclamation leaves some projects with NO periodic reviews, and the public with NO opportunity to review and comment on these projects.

In the 2026 Docket Report the KC Executive stated:

"The Washington State Department of Natural Resources (DNR or the State) has exclusive authority to regulate surface mine reclamation, unless the State delegates authority to King County. The State has done so for the Reserve Silica mine. Two other sites exist with County reclamation permits: Ravensdale Trenches and Jones Road Reclamation; the County has authority because the sites predated State reclamation regulations."

"With reclamation duties vested to the State, along with the inherent authorities of the State to compel operators to comply with permit requirements, the Executive believes the State remains the appropriate lead for mine reclamation."

"Given this, the Executive does not support including the reclamation work in the periodic review process. Instead, the Executive recommends continued coordination between the County, the State, the operator, and

other relevant parties, on all phases of the mining permit and supports continued involvement and information sharing as part of the Annual Inspections program.”

Unfortunately, there is no good “*coordination between the County, the State, the operator.*” Plus, KC cannot continue to allow Reserve Silica’s multi-decade landfill operation, to not be subject to 5-year Periodic Reviews.

This would affect KC Code Titles 21A.22.050 Periodic review and 21A.22.081 Reclamation, as well as KCCP Policy R-798.

Please refer to the Joint Team’s 2025 Docket Request and its extensive supporting information.

S. Other additional items:

1. Mineral Resources Map — Although KCCP Policy R-793 (see below) allows amendments to the Mineral Resources Map during a Mid-Point Update, no modifications are necessary as King County has identified all the mineral resources it needs far into the future.

R-793 King County may amend the Mineral Resources Map to identify additional Potential Surface Mineral Resource Sites as part of the 10- year or midpoint update.

2. TUPs, CUPs, and Event Centers — There are major ongoing issues that must be continually monitored, clear definitions are needed. Consequently, changes are needed in KC Code (e.g., “*temporary*” should mean temporary, not “*annual renewals,*” etc.)
3. Mining Site Reclamation — Often 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. KC Code 21A.22.060—Mineral Extraction — Site Design Standards should be complemented by include a statement that major changes in the Reclamation Plan (or Schedule) shall require a new application to conduct mining (with accompanying public comment, etc.). We recommend a new subsection 5. be added to paragraph 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.
4. Cedar Hills Regional Landfill (CHRLF) — KCCP Policy F-440 should no longer be about *maximizing* capacity, but about directing KC SWD to *plan for final closure* after its 2019 Comprehensive Plan expansion is complete and to commit to a future disposal alternative now. Also, we call for monitoring the Green Energy Special District Overlay (SDO) adjacent to the CHRLF.

5. **Transportation — KCCP Land-Use and Transportation Elements are inconsistent, thus violating State GMA.** One of the reasons for that inconsistency has been the severe lack of funds for county roads over the past decade, leading to a priority on preserving existing facilities and the lack of funds for transportation improvements that respond to countywide growth, not to mention compliance with state mandates to update transportation plans to a multi-modal level, even in rural areas. The Joint Team provided extensive testimony to the Local Services Committee in 2024 on ways to accomplish such an update of the county's transportation plan. With the recent enactment by the Transportation District of a sales tax increase, additional funding for transportation improvements is now available. The Strategic Plan for the Roads Division should now adopt new project categories for multimodal improvements and for coordination with the land use growth plans of suburban cities that rely on county roads for their connection to the region's urban core. See <http://gmvuac.org/wp/wp-content/uploads/2024/02/KC-Execs-Recomd-Plan-Detailed-Comments-2-6-24.pdf> starting at p. 41 and starting at p. 76.

B. SEPA Work Program

SEPA review for the 2029 Midpoint Update has begun with the transmittal of this scope of work in November 2026 to the County Council, with a concurrent issuance of a Determination of Significance and SEIS Scoping Notice. The comment period for the SEIS Scoping Notice will end during the Council's review of this scope of work. The scoping for the SEIS will be finalized after the Council's approval of this scope of work.

The Draft SEIS is expected to be released concurrently with the release of the Executive's Public Review Draft in early 2028. The environmental review will continue through Council's review of the plan and will be concluded in advance of final action by the full Council in June 2029.

C. Public Participation Work Program

The GMA and King County Code require early and continuous public participation in the preparation of comprehensive plan amendments. Consistent with this, the County will conduct a multi-phased approach to public engagement for the 2029 Midpoint Update. Throughout the process, the County will: center the voices of those who are Black, Indigenous, People of Color, immigrants, and/or refugees, and other intersectional populations, including those who earn less than 80 percent of the area median income, people with disabilities, seniors, LGBTQIA+ people, and/or those who identify as women; and partner with King County equity cabinets and community-based organizations.

I. Phase 1 – Scoping

The scoping phase included sharing information about comprehensive planning and the 2029 Midpoint Update with existing County boards and commissions, conversations with established community-based organizations and community leaders, attending community events, Council consultation, and review by the Comprehensive Plan Equity Advisory Cabinet. A Public Review Draft was issued on July 13, 2026, with a comment period running through August 2, 2026. After the public

review period is closed, the Executive will finalize the scope of work and transmit it to the Council in November 2026. The Council will have their own public input process on the scope of work, and is expected to adopt the scope of work in February 2027.

II. Phase 2 – Development of Executive Public Review Draft

The Executive branch will engage with the community to develop the Public Review Draft of the 2029 Midpoint Update. This will include educational engagement to expand the knowledge base about what comprehensive planning is and why it matters. Then, the Executive will involve and collaborate with the community in developing policy concepts and proposals that will be included in the Public Review Draft of the 2029 Midpoint Update; this will include engagement with existing County boards and commissions, conversations with established community-based organizations and community leaders, attending community events, Council consultation, and review by the Comprehensive Plan Equity Advisory Cabinet.

III. Phase 3 – Development of Executive Recommended Plan

The third phase will take place after the Public Review Draft has been released and will start with a 30-day public review and comment period. Once public feedback has been compiled, updates to the Public Review Draft based on this input will be communicated back to the groups who have been engaged in the previous phases of the 2029 Midpoint Update, including how the input shaped the Executive recommended plan and what the next steps are for the process. Additional community engagement, again with existing County boards and commissions, conversations with established community-based organizations and community leaders, attending community events, Council consultation, and review by the Comprehensive Plan Equity Advisory Cabinet will be completed. The Executive Recommended Plan will be transmitted to the Council by December 29, 2028.

IV. Phase 4 – Council Review, Refinement, and Adoption

The Council review, refinement, and adoption phase will include additional public outreach and opportunities for public input as part of the decision-making process. This will include the ability to submit written feedback throughout the process, opportunities for verbal public comment, a formal public hearing before the full Council, a 30-day notice of the public hearing date and a formal comment period, emailed notices of key milestones and opportunities for input, and a mailed notice to properties near proposed land use and/or zoning changes.

V. Public Participation Plan

To support early and continuous engagement, especially with the community, the Executive will develop a public participation plan. The public participation plan will strive to meet the "Co-Create" level of community engagement as outlined in the Executive's Community Engagement Guide. Development of this plan will build on the community engagement work completed with the 2024 Comprehensive Plan update, and include:

- Establishing a Comprehensive Plan Equity Advisory Cabinet;
- Asking how the community would like to be engaged;
- Working with the community to identify the organizations, groups, and leaders that should be included in the engagement process;
- Reflecting a desire to meet people where they are by attending community meetings held by community-based organizations and other King County agencies; and
- Incorporating language access strategies, including offering interpretation services and translation of key materials.

A key aspect of the public participation plan will be identifying the strategies for informing, consulting, and involving the community throughout the entire planning process. As required by K.C.C. 20.18.160, at a minimum this will include posting information online about the Comprehensive Plan and the 2029 Midpoint Update, the updated schedule, opportunities for public involvement and ways to provide input, and the range of proposals under consideration by the County. Information and project updates at key milestones will also be provided, as appropriate, via a variety of methods, such as the Comprehensive Plan email list, other County email lists, social media, and hard-copy materials at key locations.