

Joint Team

Rural Area: DC, EPCA, FCUAC, FoSV, GMVUAC, GRC, GV/LHA, HHA, SCAR, UBCUAC, V-MICC
Urban Unincorporated Area: FCG, NHUAC, SC, WHCA

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To: Jake Tracy, Senior Principal Legislative Analyst, KC Council: jake.tracy@kingcounty.gov
Ty Peterson, SEPA Responsible Official, KC DLS: ty.Peterson@kingcounty.gov

cc: Erin Auzins, Regional Planning Lead, KC Exec. Office: eauzins@kingcounty.gov
Crystal Chindavongsa, C. KC Community Relations Mgr.: cchindavongsa@kingcounty.gov
Ryan Quigtar: S. KC Community Relations Mgr.: rquigtar@kingcounty.gov
Angela Phan: E. KC Community Relations Mgr.: anphan@kingcounty.gov

Subject: **SEPA Non-Project Action DNS—Proposed Ordinance To Adopt Amendments to the CPPs Establishing a Limited Process for Technical Amendments to the UGA Boundary**

The Joint Team of 15 King County Rural and Urban Unincorporated Area Organizations is please to submit the following comments on the subject Determination of Non-Significance (DNS) that is described as follows:

“The amendments would allow King County to propose and approve a technical Urban Growth Area amendment without separate Growth Management Planning Council review or recommendation and without city and town ratification when the amendment satisfies the new technical- amendment criteria.

A technical amendment would be required to be not inconsistent with the Growth Management Act and to address a mapping error or discrepancy, a building or parcel split by the Urban Growth Area boundary, alignment of the boundary with either edge of a right-of-way or similar linear feature it currently touches, encompassing urban-serving infrastructure existing prior to January 1, 2027 within the Urban Growth Area boundary, or a similar technical issue. Technical amendments could not be made for the purpose of increasing housing or employment growth.”

Specifically, the following changes to the Countywide Planning Policies (CPPs) are proposed:

“FW-1 Maintain the currency of the Countywide Planning Policies through periodic review and amendment. Initiate and review amendments at the Growth Management Planning Council through the process described below:

- a) Only the Growth Management Planning Council may propose amendments to the Countywide Planning Policies except for amendments to the Urban Growth Area that***

may also be proposed by King County in accordance with policies DP-16 through DP-((18B;))19.

b) ... through... e)

f) Subsections b), d), and e) of this policy do not apply to technical amendments to the Urban Growth Area consistent with Policy DP-18C. A technical amendment to the Urban Growth Area consistent with Policy DP-18C may be approved by enactment of an ordinance by the King County Council and does not require Growth Management Planning Council review or recommendation or ratification by cities and towns."

and

"DP-18C Technical amendments to the Urban Growth Area are allowed if not inconsistent with the Growth Management Act and made in order to correct mapping errors or discrepancies, resolve situations where buildings or parcels are split by the Urban Growth Area boundary, align the Urban Growth Area boundary with either edge of a right-of-way or similar linear feature it currently touches, encompass urban-serving infrastructure existing prior to January 1, 2027 within the Urban Growth Area boundary, or address similar technical issues. Technical amendments shall not be made for the purpose of increasing housing or employment growth."

[We note that CPP **DP-17** and **DP-19** also contain proposed changes that directly reference the above proposed addition of CPP **DP-18C**.]

While we understand the need to streamline processes, as described in CPP **FW-1** above, especially when dealing with minor errors, etc., we are concerned the descriptions provided in CPP **DP-18C** above contain some potential instances where the *existing* oversight provided by the Growth Management Planning Council (GMPC) might continue to be warranted.

Below we list the specific instances covered by proposed CPP **DP-18C** and provide our corresponding comments:

"correct mapping errors or discrepancies"

We have no problem with this, as it simply addresses scrivener's errors, etc.

"resolve situations where buildings or parcels are split by the Urban Growth Area boundary"

Such situations often need to be addressed on a *case-by-case basis* and, thus, should go through the existing GMPC process.

"align the Urban Growth Area boundary with either edge of a right-of-way or similar linear feature it currently touches"

An example of this that has been proposed is along the southern edge of the City of Black Diamond. Because this proposal has the potential of providing future access to Green Valley Road from the Ten Trails Master-Planned Development (MPD)—something that was expressly promised would *not* happen during the many, many months of MPD Permit and Development Agreement Hearings—we have great consternation about it. So, once again, such right-of-way situations should be addressed on a *case-by-case basis* and, thus, go through the existing GMPC process.

“encompass urban-serving infrastructure existing prior to January 1, 2027 within the Urban Growth Area boundary”

This is far too open-ended and could encompass many scenarios and, thus, should be addressed on a *case-by-case basis* and, thus, go through the existing GMPC process. Also, what is special about the date given: January 1, 2027 ?

“address similar technical issues”

This potentially “*kicks the door wide open*” and, thus, is far too open-ended.

Coordinated by:

Peter Rimbos, Coordinator—Joint Team: primbos@comcast.net

Prepared and Approved by:

Rural Area Organizations: [Defend Cumberland](#); [Enumclaw Plateau Comm Assoc](#); [Four Creeks UAC](#); [Friends of Sammamish Valley](#); [Greater Maple Valley UAC](#); [Green River Coalition](#); [Green Valley/Lake Holm Assoc](#); [Hollywood Hill Association](#); [Soos Creek Area Response](#); [Upper Bear Creek UAC](#); and [Vashon-Maury Island Community Council](#)

Urban Unincorporated Area Organizations: [Fairwood Community Group](#); [North Highline Unincorporated Area Council](#); [Skyway Coalition](#); and [West Hill Community Association](#)

Technical Focal Points: Environment—Terry Lavender; Government Relations—Susan Boundy-Sanders; Growth Management—Ken Konigsmark; Historic Preservation—Karen Meador; Solid Waste Management—Janet Dobrowolski; and Transportation—Mike Birdsall