

**Comp Plan Comment from Council web site
Received August 8, 2016**

From:

Max Beers, Green Valley/Lake Holm Association
District 9

GREEN VALLEY/LAKE HOLM ASSOCIATION August 6, 2016

To: King County Council

CC: Ivan Miller - Comprehensive Planning Manager John Taylor - Assistant Director
of DNRP Land and Water Resources Division Alan Painter - Manager of the
Community Service Area

Subject: 2016 update to King County Comprehensive Plan, Chapter 5, E497

In September 2014 the newly formed Green Valley/Lake Holm Association, an association within the SE King County CSA, prepared a position paper (see attached) regarding protection of rural wells and springs. In this paper we recommended specific actions to ensure our essential rural wells and springs are protected from decreased quality or quantity by any land use change or water resource activity. In 2015 the Green Valley/Lake Holm Association, through volunteer committee work, research, and meetings with John Taylor and Alan Painter prepared recommendations for the 2016 King County Comprehensive Plan update for further protection of rural water systems throughout the county. We were pleased when our recommendations were included in the Executive's proposed KCCP update, Chapter 5, E-497.

We ask the Council to support these recommendations as stated in the proposed E-497 changes. Without adequate quality and quantity of potable water, I'm sure you would agree that properties in the unincorporated areas of the county are of little value to their owners and King County alike. People everywhere depend on clean, safe water.

Thank you for your consideration, Green Valley/Lake Holm Association
Gwyn Vukich - President E-Mail: GVLHAssn@gmail.com

Attachment:
GREEN VALLEY/LAKE HOLM ASSOCIATION
September 24, 2014
POSITION PAPER REGARDING PROTECTION OF RURAL WELLS AND SPRINGS
(PRIVATE AND CLASS B WATER SYSTEMS)

SITUATION: Our concern is the protection of rural wells and springs. After several years of pleading with Washington State and King County agencies, we feel our water systems are still vulnerable. Since 2011, a number of rural residents downstream of Black Diamond have been involved in the public review of the massive development projects wherein upwards of twenty-thousand new residents will be added to the small rural town of Black Diamond. In addition, the adjacent Reserve at Woodlands King County development project will add seventy-seven homes with individual septic systems and a lake-sized storm water detention pond servicing both developments. Soliciting State and County agencies to protect our rural water systems from these development impacts resulted in little or no help. Their answers included: we don't have budget, or it's not our responsibility. A small Class B system, whose neighbor plumbed into their main water line, received similar answers when requesting assistance. To compound the problem, in the spring of 2014, without thorough studies and without informing rural residents of potential impacts to their drinking water systems, King County pumped flood waters from Horseshoe Lake into a gravel pit instead of an engineered storm water detention pond. Such large scale urbanization with major clear cutting, septic tanks, and urban chemical leaching into soils clearly could have significant impact on ground water flows and put at risk our rural wells and springs. Adding the periodic threats of smaller actions further increases these risks. Despite being comprehensive and well-intended, current state and county laws are inadequate to protect private and Class B water systems. For example, in state law chapter 246-291 WAC, there is no water system plan to protect our rural water systems beyond a small protective radius around the water source. King County Title 13 and other regulations and programs do not provide for specific protections for rural water systems receiving ground water from surrounding lands that may be affected by development. (see attachment #1). Without assurances of protection and full mitigation we feel vulnerable and fear violation.

PROPOSALS: To receive assurance our essential rural wells and springs are protected from decreased quality or quantity by any land use change or water resource activity, we propose the following:

Risk assessment using best science: In any land use change or water resource activity approval process, there should be a condition included to identify and provide periodic impartial risk assessments, using best science techniques, for the rural water systems which could be affected by the proposed action.

Depending on the level of risks, appropriate quality and quantity monitoring should be conducted plus potential impact mitigation identified, e.g., water purification systems or alternative water sources.

Communication and coordination with rural property owners: Early in the approval process, all rural property owners whose wells or springs could be affected by the proposed action should be notified and involved when addressing potential risks and when considering associated monitoring and mitigations. Ongoing property owner support should be provided by coordinated and funded government agencies with well-defined and communicated responsibilities, so rural property owners know where to go for assistance with water issues.

REQUEST: We request that the Growth Management Act, the County and City Comprehensive Plans, and associated regulating documents be updated per our proposals and adhered to meticulously--the goal being to maintain the distinct character of our rural areas and to protect our chosen rural life style.

Green Valley/Lake Holm Association Mike Morris, President E-Mail:
GVLHAssn@gmail.com

From: [Jensen, Christine](mailto:Jensen.Christine)
To: [CouncilCompPlan](#)
Subject: Fwd: Friends of Rock Valley Statement of Position: Reserve Silica Rural Mining Site Conversion Project
Date: Tuesday, August 16, 2016 9:21:15 AM

Christine Jensen
 Principal Legislative Analyst
 King County Council

Begin forwarded message:

From: FRCV Friends of Rock Creek Valley
 <friendsofrokcreekvalley@gmail.com>
Date: August 16, 2016 at 9:16:58 AM PDT
To: Christine Jensen <christine.jensen@kingcounty.gov>
Subject: **Fwd: Friends of Rock Valley Statement of Position: Reserve Silica Rural Mining Site Conversion Project**

To: King County Council TrEE Committee
 c/o: Christine Jensen, Council Staff

Hello Christine,
 Below is the Friends of Rock Creek Valley position statement in regards to the King County Comp Plan Chapter 12, Policy I-203: Mining site conversion demonstration project. This statement was sent directly to all King County Council Staff Members on June 1, 2016, but we would like to have it also included as a formal comment to the Council to be included under Public Comments received regarding this Policy in the TrEE Meeting Packet notes.

The full statement of the Friends of Rock Creek Valley position is detailed below, but in brief:

As the only community group to support the I-203 Mining Site Conversion Demonstration Project amendment in 2012, we would like to formally go on record as withdrawing that support. Further, we endorse the County Executive's proposal to drop this provision from the 2016 Comp Plan; and we unequivocally oppose the draft Reserve Rural Mining Site Conversion Project proposal currently being circulated by Reserve Silica Corporation, Frank C. Melfi, President.

Thank you,
 Michael A. Brathovde, Acting Chair
 Friends of Rock Creek Valley

----- Forwarded message -----
From: **FRCV Friends of Rock Creek Valley**
 <friendsofrokcreekvalley@gmail.com>
Date: Wed, Jun 1, 2016 at 8:22 AM

Subject: Friends of Rock Valley Statement of Position: Reserve Silica Rural Mining Site Conversion Project

To: Claudia Balducci <claudia.balducci@kingcounty.gov>, Dave Upthegrove <dave.upthegrove@kingcounty.gov>, Jeanne Kohl-Welles <jeanne.kohl-welles@kingcounty.gov>, Joe McDermott <joe.mcdermott@kingcounty.gov>, Kathy Lambert <kathy.lambert@kingcounty.gov>, Larry Gossett <larry.gossett@kingcounty.gov>, Pete von Reichbauer <Pete.vonReichbauer@kingcounty.gov>, Reagan Dunn <reagan.dunn@kingcounty.gov>, Rod Dembowski <rod.dembowski@kingcounty.gov>
Cc: Dow Constantine <kexec@kingcounty.gov>, Lauren Smith <lauren.smith@kingcounty.gov>, Ivan Miller <ivan.miller@kingcounty.gov>, Linda Vane <linda.vane@kingcounty.gov>, Tom Goff <tom.goff@kingcounty.gov>, Lisa LaBrache <lisa.labrache@kingcounty.gov>

To: King County Councilmembers

From: Friends of Rock Creek Valley

Re.: Reserve Silica, Reserve Rural Mining Site Conversion Project

As the only community group to support the I-203 Mining Site Conversion Demonstration Project amendment in 2012, we would like to formally go on record as withdrawing that support. Further, we endorse the County Executive's proposal to drop this provision from the 2016 Comp Plan; and we unequivocally oppose the draft Reserve Rural Mining Site Conversion Project proposal currently being circulated by Reserve Silica Corporation, Frank C. Melfi, President.

The Mining Site Conversion Project not only utterly fails to meet the provisions under which we were willing to support the I-203 Amendment in 2012, but in our opinion, it in no way "demonstrates" either the intent or spirit of this last minute compromise amendment crafted by then Councilmember Larry Phillips in 2012.

Following extensive review, we believe this site to be totally inappropriate for the upzone and siting of a residential housing development. Aside from the numerous County Codes such an upzone and development would violate, the site has significant environmental and health hazards stemming from its use as an industrial mining and hazardous waste dump site. The potential risks to future

residents on this site if the proposed Mining Site Conversion Project is allowed to proceed are real, and we believe that any entity approving or endorsing such development on this site, knowing the risks, could be subjecting themselves to future legal action for exposing residents to those risks.

While we agree the forestry potential of this property is not appealing to a large-scale “industrial” timber company (i.e., a Weyerhaeuser, Plum Creek, Hancock type investor), the reclamation of the site – that is, restoring its ability to sustain a viable forest with all the associated benefits of such a forest, within the Forest Production District – is highly feasible and economically practical. And such reclamation should be the minimum requirement of any reclamation effort, i.e., to return the site to its pre-mining condition to the maximum extent reasonable, and allowable given the hazardous waste mitigations on the site.

For the last 30 years this property has been continuously managed and operated by Reserve Industries, Inc. through their wholly owned subsidiaries, L-Bar Products, Inc. (1986-ca. 1990) and Reserve Silica Corporation (ca. 1990-present). Photo evidence demonstrates that as late as ca. 1985 much of the property supported well-stocked stands of timber. The decision to not manage the forest resources on portions of the property outside the silica sand strip mining areas since 1986 was a business decision made by the current owners of the property, i.e., Reserve Silica. As such, the fact that these portions of the property do not currently have commercially valuable timber stands is solely a consequence of the property owner’s actions or inactions, and in no way should these conditions justify rewarding the owner with an upzone and housing development because they now state it is too time consuming and costly to remedy their actions.

Additional comments addressing specific aspects of the Reserve Silica Rural Mining Site Conversion Project will be forthcoming once the final proposal is formally submitted for Council consideration. However, in the meantime, we would encourage Council Members and the County Executive to research the history, past legal actions and practices of the Reserve Industries organization, including its numerous subsidiaries, before committing to support this proposal.

Lastly, to reiterate: **The Friends of Rock Creek Valley STRONGLY OPPOSES any Mining Site Conversion/Demonstration Project plan to upzone and create a housing development on the Reserve Silica property in Ravensdale.**

Michael A. Brathovde, Acting Chair

Friends of Rock Creek Valley

To: King County July 19, 2016

From: Hollywood Hill Association

Re: Sammamish Valley Wine and Beverage Industry Study

Overview Statement

The Sammamish Valley (the Valley) is an ongoing success story that brings the benefits of good growth management directly into the lives of our citizens, our industry and our visitors.

Amidst the storm of tremendous development pressures that are buffeting our region, we should hold firm the course of protecting the unique gem that is the Sammamish Valley agricultural district and the Rural neighborhood ambiance that cradles it.

There are certainly changes that could improve our stewardship, but the King County Executive's "**Sammamish Valley Wine and Beverage Industry Study**" (the Valley Study) **has been directed largely toward exploring options for loosening the protections that have that have so successfully nurtured the Valley environs.**

Many communities across our nation have been laid to waste by strip-mall sprawl because they have allowed short-sighted interests to have their way with their community development.

We can and should continue defending, clarifying and strengthening the successful policies that have brought us to this point in Rural Unincorporated King County.

The Hollywood Hill Association will provide a series of public comments, each addressing specific aspects of the issue pertinent to the Valley Study.

Our goals are to:

1 - Uphold and strengthen the existing policies that have been successful in nurturing the Rural Sammamish Valley environs.

2 - Pursue clarity and simplification to the existing codes for permitted and conditional uses.

3 - Be mindful that policy enacted here will extend or set precedent for Rural areas across King County and the State of Washington.

But first, we must address the elephant in the room:

Code Enforcement

Code enforcement is the overarching issue that needs to be addressed, yet the Valley Study agenda has been directed away from discussion of that issue. It has only been due to its insertion by numerous panel members that it has received any attention at all.

We have had close to ZERO code enforcement of our zoning laws in regard to illegal commercial activities in our part of the County for some time now.

Code enforcement should be a primary responsibility of our governmental organizations. It protects our property rights, be they residential or commercial, from illegal actions that compromise the integrity of our law-abiding community and their investments.

King County has been negligent in upholding this primary duty. It is no surprise that this lack of code enforcement has encouraged some people to disregard the law.

While the vast majority of wineries in the Valley have successfully built their business in accordance with the law and zoning restrictions, lawbreakers upend the harmony of the business community.

Indeed, the Valley Study appears to be designed to legalize a handful of businesses located just outside of the City of Woodinville boundaries at the Hollywood Hill Schoolhouse intersection that are flagrantly violating the King County Code. Exactly what kind of message does this send to our citizens?

The following ongoing violations are located on six Rural RA zoned properties clustered on the east side of the Sammamish Valley. King County violation case numbers are included:

1. **Lerone Holdings LLC**. Owner: **Sal Leone**. Multiple illegal businesses, all owned by Mr. Leone, on parcel #1526059051. ENFR15-0287 (Mr. Leone is a long-time businessman in the Woodinville area. He owns property across the Valley, inside Woodinville, where his business operations would be legal. He purchased the referenced Rural parcel with full knowledge that his operations would be illegal there. He did significant new construction and remodeling without permits. He is operating a tavern and several tasting rooms without valid Washington State liquor licenses as they specifically state that they are valid only if the business complies with all local zoning and applicable codes. He is also violating several King County codes concerning signage.)
2. **Patit Creek & Forgeron** – retail tasting rooms and sales outlets for wineries located in Walla Walla, WA. Property owned by **SR 9 Investments** and leased to Patit Creek and Forgeron. P#3404700030. ENFR15-0486
3. **Feliciano** – retail tasting room and sales outlet for their winery located in Milton-Freewater, Oregon. Property owned by **Dale Carlson** (lives in Toppenish, WA) and leased to Feliciano. Parcel#3407700006. ENFR13-0143

4. **Cave B** – retail tasting room and sales outlet for their winery located in Quincy, WA (Columbia Valley). Property owned by **Larry Scrivanich/Camano LLC** and leased to Cave B. P#3404700026. ENFR15-0538

5. **Cougar Crest** – retail tasting room and sales outlet for winery located in the Walla Walla Valley. Property owned by **Steve Lee** and leased to Cougar Crest. P#3404700027. ENFR15-0525.

6. **Matthews** – retail tasting room and sales outlet for their winery located in Woodinville’s North Warehouse District. Residential house used for nightly rental – non-owner-occupied property, thus illegal “B&B”. Regularly hosts very large events. Property, B&B and tasting room owned by **Rubstello-Otis LLC**. P#1526059092. ENFR12-0239

It is important to keep in mind that the vast majority of the “wine and tourism” businesses around the Valley are operating in compliance with the applicable zoning laws. Legal businesses have lost tenants due to cheaper rents charged by some of the rogue property owners listed above.

King County’s failure to uphold the County Code has allowed these few exceptions to persist, building a false perception of legitimacy. These activities would not exist on these residential zoned parcels if we had a competent Code Enforcement division of King County’s Department of Permitting and Environmental Review (DPER).

It is clear that these transgressions are an effort to sidestep the Urban Growth Boundary and extend “urban” uses into Rural King County.

Concluding comment:

When the consultants hired by King County for the Valley Study attempted to find examples of comparable wine-producing areas, they concluded is that the Sammamish Valley and its environs are unique.

There are no comparables.

If we want to leave our Valley as a legacy for which we can be proud, then we must be clear about what it will take to protect it. Capitulation to speculators and law-breakers will have predictable results: this beautiful Valley will be but a fond memory before we know it.

To: King County 9 August, 2016

From: Hollywood Hill Association

Re: Sammamish Valley Area Wine and Beverage Industry Study

Home Occupations, Home Industries and Bed & Breakfasts

There is an increasing trend to utilize RA-zoned properties purely for commercial purposes. Many of these claim to be “Home Occupations”, even though the property is not the residence of the business owner(s).

We should put the “home” back in “Home”. The proposed changes to “Home Occupation” and “Home Industry” codes, below, would be a return closer to the spirit of pre-2008 KC codes and would more clearly protect our Rural neighborhoods from incompatible commercial or business development.

Other existing regulations (floor space, visitor parking, hours of operation, # of employees, etc) would likely remain as they are.

We urge the following elements to be incorporated into King County code:

Home Occupations (permitted) def. 21A.06.610, 21A.08.030 and 21A.30.085

1 - Home Occupations defined and permitted only as an auxiliary use on property used as the **business owner’s primary residence**.

Prior to the 2008 CP Update, business owner occupancy was specified in KC codes, but was removed with that update cycle. This has resulted in predicted problems. It should be replaced.

If a Home Occupation business is owned by multiple entities, the business owner(s) with a controlling interest in the business (>50%) must use the property as his/her/their primary residence.

Along with this change, criteria should be established as to what constitutes proof of a “primary residence”.

2 - **Auxiliary structures** – permitted only for **storage** of items in conjunction with a Home Occupation. Use for activities of the Home Occupation NOT permitted without a CUP (see Home Industries).

3 - **Alcoholic beverage sales** – Only products made on-site may be sold at the property. Sales of products produced off-site should not be permitted (other than items such as the materials used for packaging the products and primary agricultural components such as grape juice, fruit, etc).

Home Industries (conditional) def. 21A.06.605, 21A.08.030 and 21A.30.090

1 - Home Industries permitted only as an auxiliary use on property used as the **business owner's primary residence**.

Prior to the 2008 CP Update, business owner occupancy was specified in KC codes, but was removed with that update cycle. This has resulted in predicted problems. It should be replaced.

If a Home Industry business is owned by multiple entities, the business owner(s) with a controlling interest in the business (>50%) must use the property as his/her/their primary residence.

Along with this change, criteria should be established as to what constitutes proof of a "primary residence".

2- **Auxiliary structures may be used for activities associated with the Home Industry**, conditional on meeting applicable KC site-specific standards (CUP). Size limits on such auxiliary structures should be specified.

3 - **Alcoholic beverage sales** – Only products made on-site may be sold at the property. Sales of products produced off-site should not be permitted (other than items such as the materials used for packaging the products and primary agricultural components such as grape juice, fruit, etc).

Bed & Breakfast, Guesthouse def. 21A.06.090, 21A.08.030.p.9

Clarify code to state that such use is permitted only accessory to use of the property as the primary residence of the business owner.

“Business owner” defined as the owner of at least 51% of the business.

Along with this change, criteria should be established as to what constitutes proof of a “primary residence”.

Despite recent work on marijuana policies, King County has far to go before it can be considered fair and equitable as a local government. There seems to be two standards of fairness for different local communities in unincorporated King County, and even when new policies that provide relief are made, executive performance can easily defeat those intended benefits. The residents of unincorporated King County need a local government that is not only capable of making good policy, but is also committed to follow through with it.

“Zoning regulations can be used to reduce concentrated exposure to alcohol, tobacco and marijuana by regulating the number of outlets that can sell these products and advertising that is in view of the general public.”

Looking at the map I’ve copied from the 2016 Comprehensive Plan, one can only wonder why within the county’s own identified priorities that the county has permitted 14 of 17 retail marijuana stores to be concentrated in the two already most impacted communities identified on this map. The answer, it seems, is that there are two standards of fairness operating in our local government.

We in these communities had hoped that recent marijuana zoning regulation changes would bring a stop to the county’s permitting of these stores where they are already over-concentrated. Despite the good intentions of the council in its recent action however, King County local government is so far failing to fairly follow through.

I found out last week that this hope is premature. On the very day of the council’s vote, the Washington Liquor and Cannabis Board proposed yet another marijuana store in White Center, at the time subject to a moratorium on marijuana businesses. I contacted King County DPER to advocate for the county to respond that King County does not approve of a new marijuana retailer at that location, not only because of the moratorium in effect, but that post-moratorium that location is within a prohibited 1,000 foot buffer zone from three existing marijuana stores which is now prohibited.

I spoke directly with the director of DPER. And he told me that there’s nothing to justify King County disapproving this new retailer in its response to the WSLCB. We discussed this at length, and he told me in no uncertain terms that we as a community are on our own to protest to the WSLCB on this issue, that he has no tools to intervene on our behalf. This is also the same executive staff member who seriously misrepresented the actual number of retail marijuana licenses that had been issued in direct testimony to this council at its July 25 meeting.

The council ought not to be sanguine about its accomplishments on marijuana policy either. If there are not two standards of fairness in operation here in unincorporated King County, then who on this council can explain to its citizens why there is a limit on the number of marijuana stores that can be located in every single council district except two? (And these limits are scheduled to be in effect until at least 2019.)

In light of a clear need, the council needs to do more to regulate the sort of advertising that pervades a community where retail marijuana stores are concentrated.

The communities of White Center and Skyway fully support the following in the comprehensive plan update. There is a very real need right now for action by this council to bring action to these words:

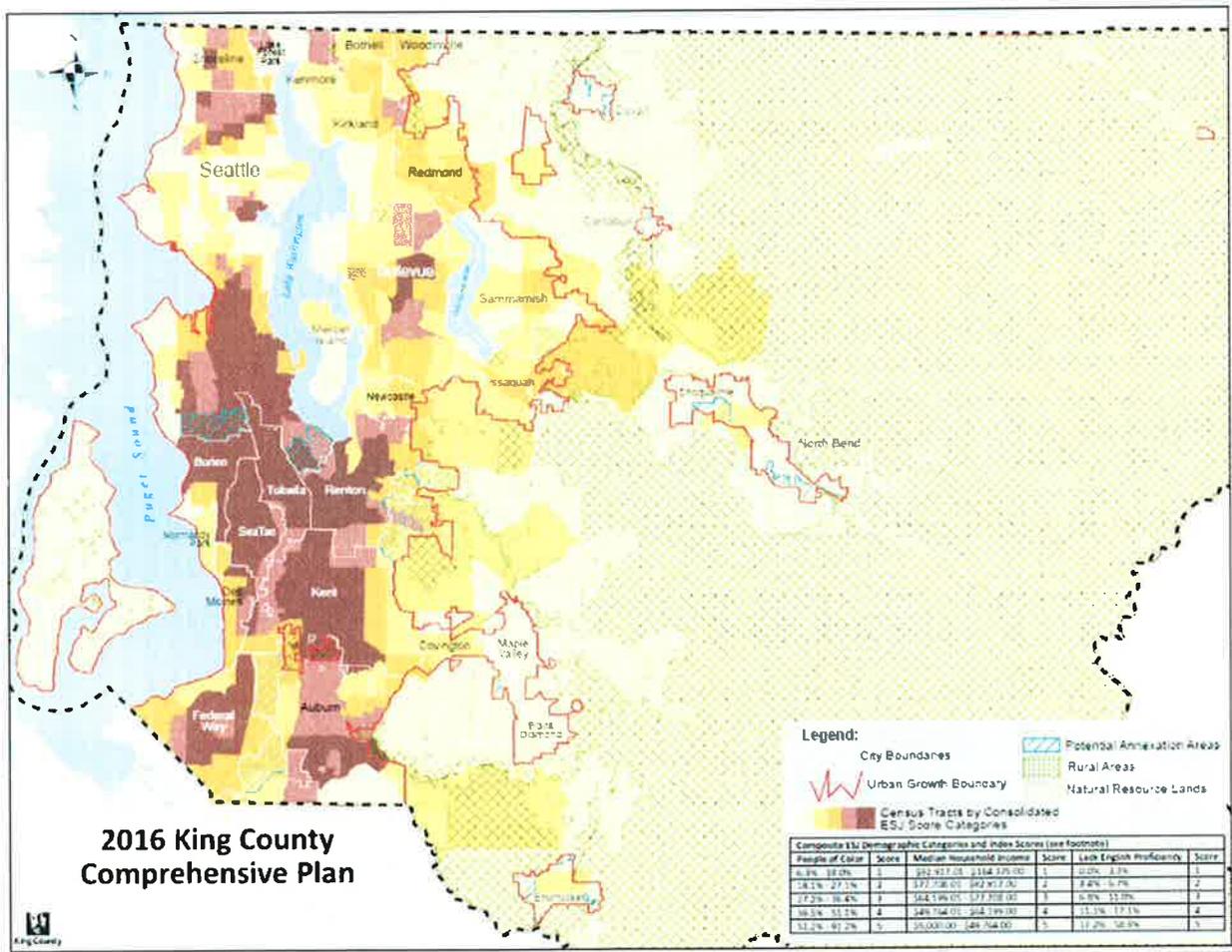
“The environment surrounding a school and the routes a typical student travels to school or nearby

school-related destinations also must be considered, including managing density of retail uses that primarily sell alcohol, tobacco and marijuana”

U-113 King County ((should)) shall promote children’s health by encouraging and supporting land uses in the environment surrounding a school and on travel routes to schools that complement and strengthen other formal programs, such as Safe Routes to School.

I’ve testified before this council already that the parking lot outside one of the state-licensed marijuana stores in Skyway is also a school bus stop. It was shameful in the first place for King County to have permitted this store there in the first place. And there is certainly no basis for any claim whatsoever that King County has at all been managing the density of retail uses that primarily sell marijuana, except in those areas of the county where these stores are now prohibited.

Figure: Equity and Social Justice Priority Communities and Growth Management Act Geographies

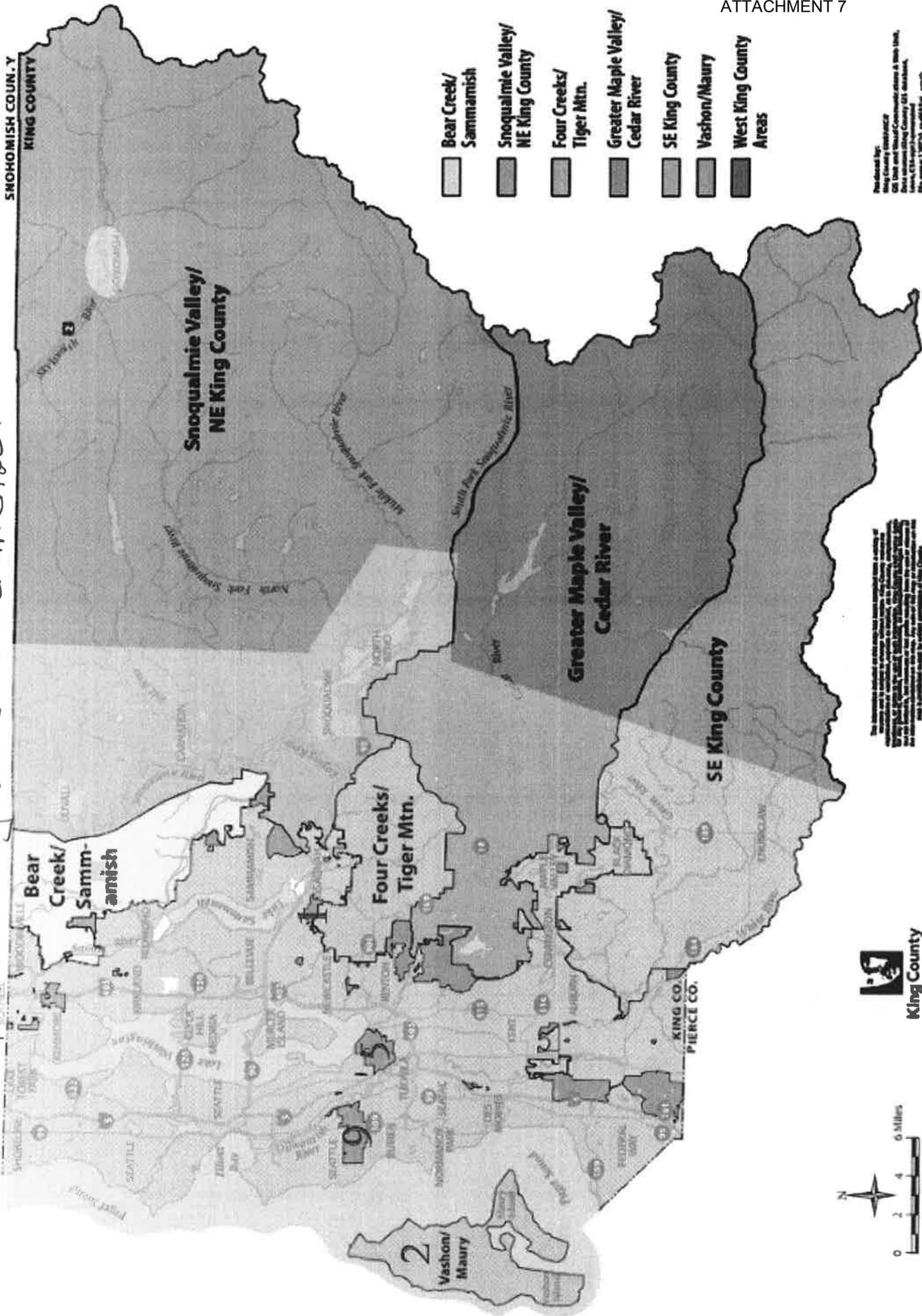


Respectfully submitted August 16, 2016,

--Mark Johnston
Skyway resident

Unincorporated King County Community Service Areas

petal map / nava concentration



Prepared by:
King County Information
GIS Data and Visual Communication & Data Unit
Data and Visual Communication & Data Unit
1000 4th Avenue, Suite 1000
Seattle, WA 98101
File name: 1.2012_KC_CSA010101_0101_0101

The information on this map was prepared by King County Information GIS Data and Visual Communication & Data Unit. It is provided as a public service and is not intended to be used for legal purposes. King County Information GIS Data and Visual Communication & Data Unit is not responsible for any errors or omissions on this map. For more information, please contact King County Information GIS Data and Visual Communication & Data Unit at (206) 462-3000.

0 2 4 6 Miles
July 2012

King County



This is an elementary school bus stop in Skyway

VASHON-MAURY ISLAND COMMUNITY SERVICE AREA PLAN

August 17, 2016

Transportation, Economy & Environment Committee
King County Council
516 Third Ave., Room 1200
Seattle, WA 98104

Re: Amendment to P-suffix #VS-P24, Masi Enterprises (Parcel #2923039148), Vashon

Dear Committee Members,

We, the undersigned, are members of the Land Use/Housing/Community Health working group for the Vashon-Maury Island Community Service Area Plan and are all island residents. Since March 2016, we've been working with King County staff to review and update the Vashon Community Plan and Vashon Town Plan. One of our top priorities for this plan is to address housing affordability, particularly within the Vashon rural town.

On August 9th, we heard a presentation from Shelter America Group, an affordable housing developer based on Vashon, about a potential 41-unit affordable housing development on the subject parcel on SW Gorsuch Road. They explained this parcel currently has two P-suffix conditions – VS-P01 that sets a maximum density of 12 dwelling units per acre, and VS-P24 restricting development to mobile homes, manufactured housing, and accessory support structures. Shelter America Group is interested in using on-site, stick-built construction and we understand they have a request before the TrEE Committee to remove VS-P24 from the parcel.

Our Land Use/Housing/Community Health working group unanimously supports removing VS-P24 from Parcel #2923039148. We do not see any detriment to removing the limitation to manufactured housing since light wood frame construction would potentially add value to the property and manufactured housing would still be an option. However, given the developer's intention to provide rental housing that is restricted to tenants below area median income and given the pressing need for island housing to meet this population, we do believe the parcel needs to have an affordability condition attached to it. For example, said condition could require all future dwelling units be restricted to those at or under 80% of area median income. We support retaining VS-P01 on the property.

Thank you for taking time to review and accept input on this issue.

Sincerely,

Emma Amiad
Tom Bardeen
Kirsten Frandsen
Kim Goforth

Lee Kopines
Jiji Saunders
Christopher Szala

Response to August 16 KC Council Staff Report, 2016 KCCP Update

After reviewing the August 16, 2016 King County Council Staff Report on the Executive's proposed 2016 KCCP Update, we wish to emphasize some of our previous Comments directly related to several of the concerns expressed in the Staff Report.

apters

CHAPTER 1—REGIONAL PLANNING

((GP-103)) RP-203 *“King County shall continue to support the reduction of sprawl by focusing growth and future development in the existing urban growth area, consistent with adopted growth targets.”*

RECOMMENDATION: *We support this policy change. It is consistent with State GMA growth-management principles, as well as Countywide Planning Policies. It focusses growth within the UGA, which is the clear intent of the State GMA.*

CHAPTER 2—URBAN COMMUNITIES

U-109 -- *“King County should concentrate facilities and services within the Urban Growth Area to make it a desirable place to live and work, to increase the opportunities for walking and biking within the community, to more efficiently use existing infrastructure capacity and to reduce the long-term costs of infrastructure maintenance. Facilities serving urban areas such as new medical, governmental, educational or institutional development, shall be located in within the Urban Growth Area, except as provided in policies R-326 and R-327.”*

RECOMMENDATION: *We support the addition made to this policy, as it aligns with our overall mission (“Keep the Rural Area rural”) by restricting the siting of urban- or largely urban-serving facilities to the Urban Growth Area.*

CHAPTER 3—RURAL AREA AND NATURAL RESOURCE LANDS

R-201 -- *“Therefore, King County’s land use regulations and development standards shall protect and enhance the following ~~((components of))~~ attributes associated with a rural lifestyle ((the)) and the Rural Area: Rural uses that do not include urban or largely urban-serving facilities.”*

RECOMMENDATION: *We strongly support this addition. The Rural Area is no place for “urban or urban-serving facilities.” (see RECOMMENDATIONS under R-326 below)*

R-324 *“Nonresidential uses in the Rural Area shall be limited to those that:*
a. Provide convenient local products and services for nearby Rural Area residents;

RECOMMENDATION: *We strongly support this addition.*

CHAPTER 5—ENVIRONMENT

We continue to support Policies **E-425**, **F-475**, **E-481**, **E-483**, **E-497**, and **E-499c** related to wetland and groundwater.

We continue to support Policy **E-499i** related to failing septic systems in constrained shoreline environments.

CHAPTER 10--ECONOMIC DEVELOPMENT

ED-404 *“Through local subarea planning and partnerships with other agencies and organizations, King County should use zoning, incentives, or other measures to ~~((ensure that an appropriate proportion of the land adjacent or near to major public infrastructure facilities is used to capitalize on the economic benefit of that infrastructure. The surrounding land uses should be compatible with the economic development uses or a buffer provided as necessary))~~ capitalize on the economic benefit of infrastructure projects, in a manner consistent with existing and forecasted land uses, and other locational criteria.”*

CONCERN: *ED-404 should not be used as a pretext to conceiving and approving “Demonstration Projects” in the Rural Area even if those sites are near major arterials, since most already are congested during ever-longer AM and PM traffic commutes. For example, the Cedar Hills Subarea is near SR-169, but the wait at the intersection traffic light is long and once successfully navigated, one sits in an 8-mile-long backup just to reach the I-405 gridlock in both north and south directions, and then the journey begins to major business centers of Seattle, Tacoma, Bellevue, and Everett.*

CHAPTER 12— IMPLEMENTATION

1. I-203 Item b.

COMMENT: *This appears to ameliorate our past and ongoing concerns related to the proposed Reserve Silica Demonstration Project. We strongly support such a change. The Executive has not supported this project, nor have we. Members of the Public in our area also strongly oppose this project. It never has been consistent with other policies in the Comprehensive Plan. The County should follow its standard methods for transitioning mining sites when resource extraction is complete, which we and the Public do support, with the land reverting to the underlying zoning as code and practice has long required. This best protects the County's forest and rural resources. [Please also see our related detailed comments above under Chapter 3, VI. Resource Lands / E. Mineral Resources (listed as Item 9.)]*