

December 28, 2007

Department of Development & Environmental Services (DDES)  
ATTN: Paul Reitenbach  
900 Oakesdale Avenue SW  
Renton, WA 98057-5212

VIA FAX (206-296-6614) and Email

Dear Mr. Reitenbach:

Thank you for the opportunity to comment on the 2008 King County Comprehensive Plan Draft. We hope DDES will take our input to heart and continue to utilize Partnership for Rural King County (PRKC) for public feedback and support.

The 2008 Comprehensive Plan (Comp Plan) does a very good job providing high-level overviews and policy recommendations. It is obvious to the reader that a great deal of thought and expertise has gone into creating the document and supporting material. In general PRKC is very supportive of the policy and narrative of the Comp Plan. We hope our comments and suggestions will help to strengthen the Comprehensive Plan and, as a result, ensure the long-term sustainability of the County.

This letter summarizes our feedback by Specific Recommendations, Areas of Support and Primary Concerns. Additionally, we have provided redlined comments per your request for the chapters most relevant to the communities we represent and serve.

## **Specific Recommendations:**

**Values-based Approach.** It is our observation that King County often bears the brunt of the development vs. sustainability argument because of the leadership position it has taken with regard to growth management and the environment. There are common values that resonate across all socio-economic spectrums of King County residents. These values center around quality-of-life issues and include health, jobs, recreation and community identity. Examples of core values include:

- 1) **Participation.** Every citizen, business and government agency has a role to play in caring for our communities and natural environment to ensure long term sustainability and quality of life in King County.
- 2) **Quality of Life.** Quality of life in King County directly correlates to the general health and welfare of residents, the ecological health of our natural lands and resources and the dynamic interplay of urban and rural areas.
- 3) **Uniqueness.** King County is special because it is urban and rural at the same time: it is large, the economy is strong, we value our natural beauty and environment and our citizens are empowered. There is no other County like King County.

**Recommendation:** King County, should identify a few core values in the Introduction, bring them to the forefront of every section, connect policies to these values and use these values to build popular support for implementation of those policies.

**Urban/Rural Symbiosis.** PRKC sees the role of the Comprehensive Plan is to ensure sustainability under increasing development pressure and expanding population. The urban areas provide economic stimulation to and support of rural and natural areas. The rural areas support healthy living in neighboring urban areas. Our communities are enriched immeasurably by the presence and availability of vibrant cities, local farms and farm products, healthy working forests, diverse landscapes and view corridors, and varied and abundant outdoor recreation opportunities.

***Recommendation:*** Public health, safety and vitality should all be linked to the symbiotic relationship between the urban and rural areas and this should be identified throughout the Comp Plan.

**Climate Change Opportunities.** PRKC expects that King County will seize this moment to provide leadership on global warming issues. The opportunity to become the regional leader in developing green industries and businesses, promoting green living and creating green jobs should not be passed up.

***Recommendation:*** Climate Change leadership should be discussed in the Introduction section, throughout the development guidelines and in all areas of the Comp Plan that address economic vitality.

**Economic Value of Ecological Services.** PRKC believes the long-term success of King County's environmental policies is largely dependant upon recognizing the economic value of the "natural" goods and services our natural areas and natural resource land provides. The economic value of ecological services such as carbon sequestration, air quality, water run-off, fish and wildlife habitat, detoxification of wastes and biodiversity increases with population and development growth. Restoration is an expensive and often inadequate alternative.

***Recommendation:*** County planners should review the 2006 Earth Economics Report for King County ([http://www.eartheconomics.org/resources/resources\\_publications.html](http://www.eartheconomics.org/resources/resources_publications.html)). The Urban and Rural sections should be updated to include policy that all costs of development larger than a single residence over 2500 square feet or a business of 5000 square feet include the actual cost of lost ecological services.

***Recommendation:*** King County should call out the potential of using public and private partnerships to provide economic incentives for public and private land owners to maintain forest cover (forest land, parks, open space).

**Community Identity.** The role that healthy community identity plays is perhaps the single most important ingredient of rural vitality. Healthy communities always have distinct identities that are a rallying point for residents and provide the wider community a sense of pride and ownership. When we think of 1.7 million additional people moving to the region in the next 20 years, the County has a wonderful opportunity to 1) empower today's rural residents to define their communities and not become displaced with or fearful of the growth coming (as was the case with the Californian migration of the 1980s); 2) draw new residents to communities which they will best identify with and thrive in; 3) promote cultural and economic diversity within and between communities. Today rural residents have little opportunity to define a vision for themselves and create the cohesive communities our county needs. PRKC understands that King County does not have staffing or resources to drive community planning.

***Recommendation:*** In the Rural section, mention that King County should leverage existing community associations and UACs to work on Community Identity under the guidance of King County planners.

**4:1 and TDR Programs.** We are supportive of King County policy that ALL urban growth area expansions and density increases will be done through the County's 4:1 and/or TDR program and only after density increases meet the overarching goals of the Comp Plan and GMA. We would like to see the 4:1 program reviewed with input from Cascade Land Conservancy, Trust for Public Land and Mountains to Sound Greenway Trust, renewed and updated in 2008 as part of the Comp Plan process. We also believe that the TDR program should be expanded to promote green building.

***Recommendation:*** All rural to urban upzones currently under consideration, and all future upzone requests, will be done through the 4:1 or TDR programs.

***Recommendation:*** The 4:1 program should be updated and continued. The program should ensure that for every acre of rural land that is upzoned to urban, 4 acres of rural lands are conserved. Update should not mandate that King County acquire in fee and manage these conserved lands but that they may be owned in fee by other public land managers or may remain in private ownership with either a conservation easement or TDR in place. Update should also look at allowing conservation acres with high ecological service value to be located over a larger geographic area such as within the same sub-basin.

***Recommendation:*** The TDR program should be expanded to allow receiving sites in all urban areas that provide affordable housing and/or are build to a high standard of green building (LEED Silver, for example).

## **Areas of Support:**

**Area Zoning Studies.** With the exception of Issaquah Highlands proposed expansion and the SR 18 hospital expansion, PRKC supports executive staff recommendations in the Area Zoning Studies. In particular, we support the County's assessment not to rezone the Duthie Hill/Issaquah-Fall City Road area due to access restraints and the value of ecological services provided by the area

**Pedestrian and Bike-Friendly Communities.** The emphasis on pedestrian and bicycle friendly communities in urban areas, rural cities, rural towns, and rural neighborhood commercial centers is very good.

**R-525 and R-527.** PRKC applauds the use of strong language to protect the Forest Production District (FPD) with policies opposing the establishment or expansion of special purpose taxing districts and local improvement districts and the planning of resorts and recreation not compatible with forestry or other resource management goals.

**Climate Change.** King County does a great job tying climate change/global warming into the Environment section of the Comp Plan. Climate change must be addressed with an interdisciplinary approach and with collaborative planning, including disaster planning.

**Document Tone.** The strikeout and edited text throughout the document demonstrates a welcome change of tone from the 2004 Comp Plan. The pattern of omitting negative statements and using affirmative statements is quite noticeable and appreciated.

## Primary Concerns:

**RA-2.5 Zoning.** While 5 and 10 acre parcels are appropriate for rural use, PRKC firmly believes that it is extremely unlikely and not economically feasible to have a working forest or farm parcel with a home on 2.5 acres. RA 2.5 zoning will remove resource lands from productive use and encourage more rural estates which do not contribute to the economic productivity or ecological health of the rural areas. We do not support additional creation of 2.5 zoning. We also do not support TDR accepting any rural area land (outside the UGA) as a receiving site.

**Snoqualmie SR-18/I-90 Area Zoning.** PRKC is strongly opposed to the executive staff recommendation for the Snoqualmie SR-18/I-90 Area Zoning Study. While we do support the existing Snoqualmie Hospital moving to a better location, we do not support building a large regional facility and question why 75 acres is needed for 25 beds. We question the need for a larger hospital on the I-90 corridor when the City of Issaquah recently did a study that determined an additional regional hospital was not needed in the area. Swedish has a state of the art emergency room off of I-90 and State Route 900 which appears to be struggling for business.

We fear that because the benevolent concepts of a hospital and community college appeal to humanitarian ethics, they will be used to increase demand for urban and regional services in the area. We believe that building large facilities will create a market for supportive services, such as restaurants and secondary medical centers. This proposal will place inappropriate development pressure outside the UGA and lead to future UGA expansion requests. All large community facilities, such as a hospital or a community college, should be located in areas where employees and students can bike, walk and take transit to the facility.

PRKC supports the existing Snoqualmie Hospital moving to this location **ONLY IF** 1) the size and nature of the hospital facility is reflective of the small communities it is intended to serve 2) no commercial or retail uses are allowed 3) the 4:1 program is employed.

**Urban Services in the “rural area”.** We are concerned that the restrictions for bringing urban services, such as water or sanitary sewer, into the rural area are not descriptive enough. Bringing these services into an area precipitates the area accommodating non-natural resources based growth in the future. We would like to request that King County review all policies with regard to extending urban services into the rural area to make sure they are tight and can not be thwarted.

**U-104.** Policy U-104 as currently written opens the door for encroachment of urban municipal services (such as community centers and underground services) and special interest groups to take Regional Park land away from all King County residents. We have provided policy update suggestions in our redline of the Park Chapter to prevent the abuse of this policy.

**Parks Ambiguity.** We are concerned that the following statement on page 6-6 “King County shall use park and recreation standards as adopted in the King County Park, Recreation and Open Space Plan, adopted in ((1996)) 2004 (and subsequent updates), as guidelines to evaluate and provide local parks, trails, and recreational services. (RELOCATED)” makes whatever is said in the Comp Plan document ambiguous and not authoritative.



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Thank you again for the opportunity to provide public comment on the Comp Plan update for 2008. We are confident the county will continue to take a strong leadership role in promoting a healthy and prosperous future for current King County residents and the generations that follow.

Sincerely,

Jennifer Harrison-Cox  
Executive Director

cc:

Karen Wolf, King County Senior Planner  
Rod Brandon, Director of Environmental Sustainability  
Kathy Lambert, Councilmember, District 3  
Larry Phillips, Councilmember, Growth Management Committee Chair