

ADDENDUM To Existing Environmental Documents

For the 2004 Amendments to

The King County Comprehensive Plan

**King County
Department of Development and Environmental Services**

September 3, 2004

Prepared in Compliance with

The Washington State Environmental Policy Act of 1971
Chapter 43.21C Revised Code of Washington
Chapter 197-11, Washington Administrative Code
Revised SEPA Guidelines, Effective April 4, 1984
And
Chapter 20.44, King County Code

Date of Issuance: September 3, 2004

Responsible Official:

Lisa Dinsmore, Planning Supervisor
Current Planning Section
Land Use Services Division
Department of Development and Environmental Services
900 Oakesdale Avenue SW
Renton, WA 98055-1219

TABLE OF CONTENTS

	Page
Fact Sheet	i
Environmental Review Process	1
Environmental Review of Proposed Amendments	1
Summary of Proposal.....	1
Comprehensive Plan Amendments	3
1. Potential Annexation Areas	3
2. Promoting Public Health.....	7
3. Sustainable Development	9
4. Urban Residential Options	10
5. Open Space and Natural Areas	12
6. Rural and Resource Economy.....	14
7. Transfer of development rights.....	16
8. Water Resources	17
9. Heritage resources.....	18
10. Transportation General	19
11. Transportation Level of Service Standards	20
12. Transportation Concurrency Management	21
Determination of adequate urban capacity.....	22
Map Amendments.....	24
Map Amendment 1. Cottage Lake	24
Map Amendment 2. Duvall Rock Quarry.....	26
Map Amendment 3. Willows Road	28
Map Amendment 4. Redmond Perrigo Park	30
Map Amendment 5. Redmond Ridge Panhandle	30
Map Amendment 6. Cougar Mountain	31
Map Amendment 7. East Renton Urban Separator.....	32
Map Amendment 8. Enumclaw Golf Course.....	33
Map Amendment 9. Covington Park	33
Map Amendment 10. Dale Frank Property.....	35
Map Amendment 11. Sammamish Plateau Access Road North Link	36
Map Amendment 12. Renton Christian Center.....	37

APPENDICES

APPENDIX A	Distribution List
APPENDIX B	Policy Matrix

Fact Sheet

- Action Sponsor: Ron Sims, King County Executive
and the Metropolitan King County Council:
- | | |
|---------------------------------|------------------------------|
| Carolyn Edmonds, District 1 | Dow Constantine, District 8 |
| Bob Ferguson, District 2 | Steve Hammond, District 9 |
| Kathy Lambert, District 3 | Larry Gossett, District 10 |
| Larry Phillips, District 4 | Jane Hague, District 11 |
| Dwight Pelz, District 5 | David Irons, District 12 |
| Rob McKenna, District 6 | Julia Patterson, District 13 |
| Pete Von Reichbauer, District 7 | |
- Contact Person: Barbara Heavey, Project Program Manager III
Department of Development and Environmental Services
206-296-7222
- Lead Agency: Department of Development and Environmental Services
900 Oakesdale Ave SW
Renton, WS 98055-1219
- Proposed Action: Annual amendments to the King County Comprehensive Plan are being proposed in accordance with the provisions of the Growth Management Act and King County Code Title 20. Executive-proposal includes amendments to the King County Comprehensive Plan, Comprehensive Plan Land Use Map, technical appendices and the development regulations that implement the Plan. In addition, the Metropolitan King County Council Growth Management and Unincorporated Areas Committee is proposing amendments to the Plan, Land Use Map and development regulations.
- Responsible Official: Lisa Dinsmore, Planning Supervisor
Current Planning Section, Land Use Services Division
Department of Development and Environmental Services
- Approvals Required: Adoption by Metropolitan King County Council

EIS Addendum
issued by:

Department of Development and Environmental Services

Location of
Background Data
& Supporting
Documents:

Department of Development and Environmental Services
900 Oakesdale Ave SW
Renton, WS 98055-1219

Metropolitan King Count Council
King County Courthouse
516 Third Ave., Room 1200
Seattle, WA 98104-3272

Date of Issuance:

September 3, 2004

Environmental Review Process

The Growth Management Act (GMA), adopted by the Washington State Legislature in 1990, established an overall framework for tiered and coordinated planning in Washington State. It requires counties and cities to work cooperatively to plan for orderly development. In 1994, King County complied with the GMA through its adoption of Countywide Planning Policies (CPPs) and the King County Comprehensive Plan (Comprehensive Plan). The primary function of the CPPs is to provide policy guidance for the orderly development of King County and its cities while the Comprehensive Plan outlines an overall vision for King County and the region. The Comprehensive Plan offers policy direction related to urban land use, rural land use, economic development, housing, natural resource lands, the natural environment, facilities and services, transportation, parks and recreation, cultural resources, energy and communications, and planning and implementation.

The GMA requires that all proposed amendments to a comprehensive plan be considered no more than once a year and that they are considered concurrently so that the cumulative effect of various proposals are considered as one consolidated package. Every ten years the urban growth area must be reviewed for adequate capacity. Under King County regulations small routine or technical changes can be made to the comprehensive plan every year, but large changes including policy amendments and the urban growth boundary can be made only once every four years. A major update occurred in 2000. The 2004 update is the second major update and the first mandated review of the capacity of urban growth area.

To comply with the State Environmental Policy Act (SEPA), in 1994 King County issued environmental impact statements (EISs) for the CPPs and Comprehensive Plan. King County issued addenda to the Comprehensive Plan EIS in 1995, 1996, 1997, and 1998. In 2000 King County issued a Supplemental EIS for the Comprehensive Plan.

Environmental review for the 2004 annual review of the KCCP occurs through the issuance of this addendum adopting existing environmental documents and assessing the environmental effects associated with the Executive Recommended Plan, March 1, 2004 (Executive Proposal) and the amendments approved by the King County Council Growth Management and Unincorporated Areas Committee (GMUAC Amendments).

This addendum provides additional information and analysis and does not substantially change the analysis of significant impacts and alternatives in the environmental documents adopted in this addendum.

Environmental Review of Proposed Amendments

Summary of Proposal

The proposed project is an update of the King County Comprehensive Plan and the ten year review of the capacity of the Urban Growth Area in accordance with the Growth

Management Act. The update includes amendments and additions to the policies of the Comprehensive Plan, amendments to the Comprehensive Plan Land Use Map, technical appendices and the development regulations that implement the Plan. This addendum reviews the update to both the policies and the development regulations. There are many technical and formatting changes to the plan such as capitalization, minor language changes and updating references to population figures, names of documents and websites. Several major sections have been moved to different chapters with no substantive changes. This analysis will only consider the affects of those amendments to the plan that are substantive in nature.

The substantive policy amendments can be grouped into the following subject areas which may include amendments to multiple chapters of the Comprehensive Plan to implement. Appendix B includes a matrix of the policy numbers and the chapters for each subject area.

1. Potential Annexation Areas: policies to encourage annexation of urban areas to adjacent cities in accordance with the Countywide Planning Policies.
2. Promoting Public Health: policies to the increase opportunities for residents to be more physically active in the urban area and to improve air quality.
3. Sustainable Development: Low Impact Development and Green Building Initiative: policies to encourage and promote the use of sustainable development practices.
4. Urban Residential Options: Cottage Housing: policies to encourage urban densities through small detached housing units with shared open spaces.
5. Open space and natural areas: policies to implement a regional park and natural areas stewardship plan and to protect sensitive natural environmental features.
6. Rural and resource economy: policies to support farm economy in agriculture production districts, rural small business economy in rural areas and long term forest production
7. Transfer of development rights: policies to facilitate the transfer of development from rural to urban areas.
8. Water resources: policies to address water quantity and protect water quality.
9. Heritage resources: policies to encourage the protection and reuse of historic properties.
10. Transportation: General: polices setting standards for urban and rural roads and fiscal priorities.

11. Transportation Level-of-Service (LOS) Standards: policies to change the urban standard from the current three standards to one standard LOS E.
12. Transportation Concurrency Management: policies to change the methodology of measuring traffic congestion from traffic volume or capacity of a roadway to a travel time system.

In addition to the Comprehensive Plan amendments, the proposal includes:

- a determination of adequate urban capacity,
- twelve land use and area zoning map amendments, and
- amendments to King County Code Titles 13, 14, 19A and 21A to implement the policy amendments. The impacts associated with the development regulations that are proposed to implement the policy amendments are the same as the impacts associated with the Comprehensive Plan policy amendments and additions.

Comprehensive Plan Amendments

1. Potential Annexation Areas

1.1 Executive Proposal

Chapter One Regional Planning

Amend existing policy to set the foundation for pre-annexation agreements between the county and a city.

Chapter Two Urban Communities

Add new policies to:

- Actively pursue annexation of remaining urban unincorporated areas; and
- Specify when properties designated rural and located adjacent to cities may be redesignated to urban for annexation to the city for park purposes.

Amend existing policies to:

- Clarify that annexation proposals within potential annexation areas are consistent with the comprehensive plan;
- Set forth how King County will evaluate annexation proposals that are not within potential annexation areas or are in areas disputed by cities;
- Set the foundation for pre-annexation agreements between the county and a city; and
- Specify when the county will support an annexation proposal.

Chapter Five Parks, Open Space and Cultural Resources

Add a new policy to facilitate the annexation and transfer of parks, trails and open spaces in the urban areas.

GMUAC Amendments

Chapter Two Urban Communities

Delete eight existing policies relating to potential annexation areas and replace with seven new policies that:

- States county's role as regional service provider, encourages annexation of unincorporated areas and allows county to be a contract service provider for local services;
- Recognizes the Interim Potential Annexation Areas Map adopted by the Countywide Planning Policies and specifies the County's role to help resolve disputed and unclaimed areas;
- States county support for annexation proposals that are consistent with Countywide Planning Policies and the Growth Management Act within uncontested PAA's;
- States criteria where the county will not support annexation proposals;
- States preference for annexation over incorporation and when the County will withhold support;
- Supports pre-annexation agreements with cities including a public involvement process and setting forth potential subject areas for the agreements.

Amends the new policy relating to when properties designated rural adjacent to cities may be redesignated to urban for park purposes.

Chapter Six Transportation

Add new policies to:

- Apply city level of service standards for determining transportation concurrency in PAA's where there is a pre-annexation agreement;
- Encourage interlocal agreements for funding transportation projects; and
- Prioritize road project that are barriers to annexation.

Chapter Eight Community Planning Areas

Amend existing policies relating to the city of North Bend PAA to delete the provisions that allow development of commercial and industrial land without sewers.

1.2 Background

Countywide Planning Policies (CPP), adopted by King County Ordinance 11446 and ratified by the cities in 1994, adopted a regional strategy of focusing growth inside of cities and identified cities as the appropriate provider of local urban services to urban areas. The long term role of King County was stated to be a regional service provider

limiting local service to the permanent rural area. The policies called for designation of potential annexation areas (PAA's) for each city. The GMA requires each jurisdiction's comprehensive plan to be consistent with the CPPs.

Cities subsequently designated PAAs in their comprehensive plans. These areas are illustrated on the Interim Potential Annexation Area map adopted by the Growth Management Planning Council and included in the King County Comprehensive Plan. The map illustrates areas where more than one city claims an area within their PAA and areas that are not claimed by any city.

Cities and the residents within unincorporated areas have the authority to initiate annexations and incorporations. The county's role is primarily one of commenting on proposals and helping to provide an orderly transition when an annexation or incorporation occurs.

1.3 Analysis

Since its designation in 1994 approximately half of the unincorporated urban area has been annexed or incorporated into cities. However, the 2003 King County Annual Growth Report indicates that 215,000 people still remain in unincorporated urban areas. This population is equivalent to the second largest city in the state. The area is not contiguous and includes some "islands" surrounded by cities, making it inefficient for one jurisdiction to provide local services.

The Executive Proposal generally refines existing policies relating to the issues of conflicts in cities PAAs and when incorporations may be preferable to annexations. A new policy restates the county's long term role as regional service provider and the desire to actively encourage achievement of the regional strategy of incorporation and annexation of urban areas.

The GMUAC Amendments delete the existing PAA policies and replace them with new policies that consolidate existing policy language on when the County will and will not support annexations and incorporations, however, there is very little change in the substantive effect. No new impacts on a non-project level are anticipated from either proposal.

The Executive Proposal adds a new policy to allow the amendment of the Urban Growth boundary to redesignate rural properties located adjacent to cities to urban for park purposes. Under the GMA cities may not annex rural areas. The policy is limited to two specific instances: existing county park facilities that are being transferred to the city and sites owned by the city before the establishment of the urban growth area in 1994 that are no more than thirty acres in size.

Under the GMA, the Countywide Planning Policies and the Comprehensive Plan rural areas are intended to be long term and not easily redesignated to urban. The situations in

which land can be converted in the new policy are limited and are unlikely to set a precedent for conversion of rural land to urban uses.

Most existing county parks in the rural area do not include intensive active uses and are compatible with their rural surroundings. Similarly, city owned sites that existed before 1994 that were designated rural are likely to be undeveloped or are already developed in recreational uses that are not incompatible with surrounding rural uses. When the parks are annexed into cities and urban services become available there is a potential for more intense use which could be incompatible with adjacent rural uses. This could put additional pressure to reclassify other rural properties to urban.

The risk of incompatibility will vary with the configuration of the sites. Sites that create uneven boundaries where the park use will protrude into the rural area are more likely to create conflict than sites that straighten the boundary so that the park use is surrounded by other urban uses and has minimal contact with rural areas. Impacts can be mitigated by limiting park uses adjacent to rural areas to passive recreation or open space.

The GMUAC Amendments broaden the new policy to allow conversion of no more than thirty acres of rural land to urban if there is a park transfer agreement between the county and the city. Unlike the Executive Proposal where the parks that qualify are already in existence, the scope of potential conversions under the GMUAC Amendment is not limited and could set a precedent for conversion of rural land. As rural land on a city's border may be less expensive than urban land within the city, there could be an incentive to look outside the urban area for parkland. Conversions could have a cumulative effect on rural lands on the urban growth boundary. Like the Executive Proposal, the configuration of the site may increase the incompatibility of uses and increase the pressure to convert additional rural land. The requirement for a park transfer agreement could mitigate the impacts if the agreement limits park uses adjacent to rural areas to passive recreation or open space.

The GMUAC Amendments add a new policy to the Transportation chapter that would allow the county to use a city transportation level of service (LOS) standard for determining transportation concurrency in the city's PAA where the county and city have entered into a pre-annexation agreement. LOS standards are applied when the county is considering an application to develop a property. If LOS standards are not met an application may not be approved or additional transportation improvements may be required. If, under this new policy, the LOS standard of the city is higher than the county, fewer developments may be approved. For residential development, this could affect the county policy to achieve residential density goals. If the LOS standard of the city is lower than the county, more developments may be approved. This could affect the level of congestion experienced in the subarea. Both of these results can be mitigated on a subarea basis by including provisions in the required pre-annexation agreement.

The GMUAC Amendments amend four polices in the Community Planning Areas chapter relating to the PAA of the city of North Bend. The amendments delete the existing provision that allows development on commercial and industrial zoned land

within the city's urban PAA without the provision of sewers. Since sewers are not currently available in the area, the amendments will have the effect of temporarily preventing development of these lands until such time as sewers are available.

The amendments do, however, make the policies consistent with the treatment of all other urban unincorporated areas by requiring sewers for new developments. Urban levels of commercial and industrial development without treatment of wastewater risks problems with pollution of groundwater and may affect public health. The new requirement to include sewers will mitigate these existing potential impacts.

2. Promoting Public Health

2.1 Executive Proposal

Chapter One Regional Planning

Amend existing policy by adding to the list of neighborhood plan elements the encouragement of healthy livable communities by promoting physical activities.

Chapter Two Urban Communities

Add a policy to identify land use actions that facilitate human physical activity in urban settings including concentrating growth into Urban Areas, promoting urban centers, allowing mixed-use developments and adding pedestrian linkages.

Amend existing urban development policies by adding promotion of health, physical activity, trail linkages, pedestrian and bicycle connections to services, transportation residential areas and public facilities.

Chapter Four Environment

Delete existing air quality text and policies and add new text and policies that focus on reducing ozone, fine particulates, toxic and greenhouse gas emissions to the air by:

- Changing King County operational practices;
- Reducing the use and improving the efficiency of motorized vehicles and other fuel burning engines;
- Reducing indoor and outdoor burning; and
- Encouraging renewable electric energy sources.

Chapter Six Transportation

Amend existing policies to:

- Encourage pedestrian connections in road design and site access standards;
- Stress that non-motorized access should be a connected network;
- Develop standards for personal mobility devices such as wheelchairs; and
- Add greenhouse gas emissions to air quality policies.

GMUAC Amendments

Chapter Four Environment

Add new text and a new policy directing the county to develop public and private partnerships to promote programs that reduce harmful emissions.

2.2 Background

There is a growing concern nationwide about the health risks of obesity and chronic diseases. Studies have indicated that a growing lack of physical activity and urban air quality add to these conditions. The design of the built urban environment can contribute to lack of exercise by impeding safe pedestrian movement through commercial and office areas and cutting off residential areas from commercial areas. This land use pattern impacts transit use and encourages higher use of automobiles for neighborhood trips.

Urban air quality affects people with respiratory illnesses and certain population groups such as the elderly or young children. Ozone and particulate pollution may be particularly harmful. The Puget Sound Clean Air Agency (PSCAA) is the lead regulatory and monitoring agency in the region. King County's role is to work to implement PSCAA's regulations and to comply with the regulations in the County's operations.

2.3 Analysis

The policies promoting physical activity by facilitating mobility for non-motorized means of transportation are consistent with the existing non-motorized transportation component of the Plan. No new impacts at a non-project level are anticipated as a result of the proposed policy amendments.

Transportation is a significant source of volatile organic compounds, greenhouse gas emissions and fine particulates and toxic emissions, particularly from diesel fuel. Reducing the number of miles traveled and using alternative fuels are the most effective methods to reduce vehicle emissions. Indoor and outdoor burning also contributes to fine particulate emissions.

King County's operation of a transit system contributes to the total vehicle miles traveled in the region. The proposed policies can reduce the county's emissions by using sulfur-free diesel and replacing vehicles that use diesel with vehicles that burn other fuels.

Further, King County's urban land use pattern can contribute to a reduction in vehicle miles traveled by creating residential neighborhoods and employment centers that facilitate the use of mass transit systems over individual vehicles and by encouraging alternatives to vehicle trips, such as walking and biking. No new impacts at a non-project level are anticipated as a result of the proposed policy amendments.

3. Sustainable Development: Low Impact Development and Green Building Initiative

3.1 Executive Proposal

Chapter Two Urban Communities

Add new policies to:

- Require King County to incorporate sustainable development and low impact development practices into the design, construction and operation of county facilities and county-financed projects including the Leadership in Energy and Environmental Design (LEED) certifications and using green building products;
- Encourage similar efforts in development by the private sector through supportive land use and building regulations.

Chapter Three Rural Legacy and Natural Resource Lands

Add new policies to promote rural residential development that retains native vegetation and soils and to encourage sustainable and low impact development practices and the dispersion of surface water runoff.

Chapter Eight Community Plans

Add a new policy to encourage low impact development on Vashon-Maury Island.

GMUAC Amendments

Chapter Two Urban Communities

Amend new policy to make the incorporation of sustainable development and low impact development practices into the design, construction and operation of county facilities discretionary rather than mandatory.

3.2 Background

Traditional development practices have many adverse impacts on the environment through consumption of energy and water, production of waste products which contribute to pollution and greenhouse gas emissions. Sustainable development is a model that looks at balancing the built urban environment with natural resource protection through planning, design and construction. The model generally includes "green building" and "low-impact development" (LID) practices. Green building includes design, construction and operational practices that reduce negative environmental impacts through siting, efficient energy and water use and materials selection. LID is a green building design approach that attempts to create functionally equivalent hydrologic landscapes on a site. Design features typically include storage, infiltration groundwater and preservation of

environmentally sensitive features such as riparian buffers, wetlands, steep slopes, mature vegetation and floodplains.

3.3 Analysis

LID is a relatively new concept in stormwater management although some aspects have been used for years. The United States Environmental Protection Agency (EPA) recently conducted a nationwide literature review to determine existing information about the application of LID in new developments and existing urbanized areas. EPA Low Impact Development (LID); A literature Review. EPA-841-13-00-005, October, 2000. The report analyzed a number of LID practices including bioretention, grass swales, vegetated roof covers and permeable pavements. In addition the Washington State Department of Ecology funded a study administered by the Puget Sound Action Team that analyzed adaptability of LID to Puget Sound conditions.

The majority of the cases cited in the EPA study are ongoing studies and the reported data are preliminary findings. The report cautions that the preliminary findings should be viewed as a starting point and not the empirical proof of effectiveness for various LID practices. However the practices do show effectiveness in removing pollutants, increasing infiltration rates and reducing runoff volumes.

Successful implementation of the design strategies can be less cost intensive than traditional stormwater control mechanisms not only in construction but also for long-term maintenance. Some LID techniques such as permeable pavements and vegetated roof tops may provide opportunities to retrofit existing highly urbanized areas.

The appropriateness of LID practices is highly dependent on site conditions including soil permeability, slope and water table depth. It may be necessary to mix LID with more traditional techniques to achieve watershed objectives for stormwater management. The feasibility of LID should be evaluated at the project level.

The GMUAC Amendments may reduce the number of county owned facilities that use sustainable building techniques over the number that might have used them in the Executive Proposal. However since LID effectiveness is site-specific, the feasibility limitation may have no different impact. No new impacts are anticipated at the non-project level as a result of the proposed policy amendments.

4. Urban Residential Options

4.1 Executive Proposal

Chapter Two Urban Communities

Add new policies to:

- Encourage accessory dwelling units in unincorporated and incorporated residential areas;

- Require development standards to promote residential infill options that retain existing housing;
- Explore development standards and funding to increase physical access for special needs and elderly populations ;
- Support specific housing options including transit oriented development, five-story wood frame multi-family, cottage style detached dwelling units; and
- Allow an increase in base density of urban residential neighborhoods for small detached residential units with common open space.

Amend existing policies to include housing options such as cottage style detached and accessory dwelling units and increase the amount of low income housing that are exempt from impact fees.

Amend King County Code 21A to implement cottage housing options.

GMUAC Amendments

Amend proposed new policy relating to five story wood frame multi-family construction from support to explore the feasibility.

Remove the change in existing policy to exempt more housing from impact fees.

4.2 Background

The urban land use pattern in the plan was based on goals of shifting residential development into a defined urban growth area and achieving long-term, defined as twenty years, average densities of 7 to 8 dwelling units per acre. This included a minimum density of four dwelling units per acre with lower densities permitted in already developed areas with little opportunity for infill. The policies also encouraged a variety of housing types to achieve the density goals and to provide housing options to accommodate all income levels and life styles.

4.3 Analysis

Both the Draft Supplemental EIS for the Executive Proposed Plan, June 1994 and the Final Supplemental EIS, November, 1994 identify impacts of the land use pattern. These impacts included the shifting of growth into a limited area, increasing density and the transformation of the character of neighborhoods over time into a more urban character.

The proposed policies further refine opportunities for infill by encouraging accessory dwelling units, small detached single family units with shared yards (cottage housing) and building techniques to reduce multi-family costs. These options utilize urban land more efficiently by increasing the number of units. The policies also increase the accommodation of various income levels and housing options for disabled and elderly populations. Specific projects may have impacts based on site conditions or locations, however, no additional impacts are anticipated at the non-project level.

5. Open Space and Natural Areas

5.1 Executive Proposal

Chapter Three Rural Legacy and Natural Resource Lands

Amend existing policies to:

- Clarify that protection extends to equestrian trails as distinct from other types of equestrian facilities; and
- Clarify when agricultural lands can be used for habitat mitigation.

Chapter Four Environment

Add a new policy to protect areas designated as aquatic reserves by state agencies.

Chapter Five Parks, Open Space and Cultural Resources

Add new policies to:

- Give guidance to open space classification system;
- Adopt an entrepreneurial model for managing and operating open space to provide fiscal support for open space lands; and
- Recognize the functional planning process for open space management.

Amend existing policies to:

- Provide guidance in the management of county-owned natural lands; and
- Add protection of contiguous tracts of working resource lands or ecological resources to the open space acquisition policy.

Chapter Seven Services, Facilities and Utilities

Add new policy relating to regional flood management including:

- Working with cities on regional flood hazard reduction plans;
- Maintaining regional flood warning programs; and
- Prioritizing maintenance of flood protection facilities and seeking additional funding sources.

Chapter Eight Community Planning Areas

Add a new policy supporting Rock Creek Valley Conservation Plan

GMUAC Amendment

Chapter Three Rural Legacy and Natural Resource Lands

Amend existing policies that clarifies when agricultural lands can be used for habitat mitigation

Chapter Four Environment

Amends existing policies to:

- Recognize Washington state wetland categorization systems;
- Add consideration of wetland values to existing consideration of wetland functions for regulatory protection;
- Allows alteration of category IV wetlands less than 2,500 square feet; and
- Require the consideration of impacts from development proposals on hatcheries and other artificial fish propagation facilities.

Chapter Five Parks, Open Space and Cultural Resources

Add a new policy to provide local parks in the rural area.

Chapter Seven Services, Facilities and Utilities

Amend existing policies to add flood risk to stormwater management goals.

Chapter Eight Community Planning Areas

Delete proposed new policy supporting Rock Creek Valley Conservation Plan

5.2 Background

King County's role in the provision of parks and open space is evolving as the County transitions from a local to a regional service provider. Many of the County park facilities are being transferred to cities for operation. While the County retains a role in large regional parks and open space, owned and managed for the public benefit, including implementing environmental protection policies. At the same time, the County continues to serve a local role to provide regulations and programs to protect the environment in the rural area and a portion of the urban unincorporated area and take a regional leadership role in flood reduction.

5.3 Analysis

While the policies relating to parks have been substantially reformatted in both the Executive Proposal and the GMUAC Amendment, there is little change in policy direction. The policies emphasize the County's regional role and provides a classification definition for regional and local parks. The policies also provide management goals for the county owned natural and resource areas.

Existing policy R-541 that allows wetland mitigation banks on land within the agricultural production district only for compensation for filling wetlands within the

district is substantially rewritten in both the Executive Proposal and the GMUAC Amendment. Companion wetland policy E-145 is untouched and retains the prohibition on using agricultural production district land to mitigate for out of district impacts.

The new R-541 allows aquatic habitat or floodplain restoration projects on land deemed "unsuitable for direct agricultural production purposes." A prohibition similar to the wetland prohibition on mitigation for impacts outside the agricultural production in not included within the policy. The Executive Proposal specifies regulatory buffers or areas where the proposed project is "more beneficial to agricultural productivity" as examples of land unsuitable for direct agricultural production purposes. The GMUAC Amendment replaces regulatory buffers with "portions of the property that have not been historically farmed due to soil conditions for frequent flooding." The Executive Proposal requires the project to be included within an "approved habitat resource management or function plan" or, in the alternative, when the project would improved agricultural productivity within the agricultural production district. The GMUAC Amendment keeps the alternative productivity option but changes the approved plan options to an approved Water Resource Inventory Area Plan, Farm Management Plan, Flood Hazard Reduction Plan or functional plan. Both versions require that agriculture remain the predominate use in the agricultural production district and not reduce the ability to farm in the area.

Both versions of the policy allow for a broader use of agricultural production lands for habitat and floodplain restoration projects. These projects may serve to benefit aquatic areas, particularly water related species such as endangered salmon. Notwithstanding the protections for agricultural land within the policy, whether the projects can be accomplished without impacting agricultural operations and economic viability of farm land will depend upon the design and location of individual projects. The policy does not include the protection against using agricultural production district property for mitigating impacts that occur outside of the district similar to the wetland mitigation policy. Given the lower price of agricultural land to urban land, this may prove an incentive to use agricultural land particularly under the GMUA Amendment version which allows projects to locate on land that has not been historically farmed due to soil conditions or frequent flooding. Since most agricultural production districts are located in major river valleys subject to flooding, without clear guidance for the time frame for historic, agricultural production district land that has la in fallow may be used for these project.

No new impacts at a non-project level are anticipated as a result of the proposed policy amendments. Impacts to agricultural lands should be reviewed at the project level.

6. Rural and Resource Economy

6.1 Executive Proposal

Chapter Three Rural Legacy and Natural Resource Lands

Add new policies to:

- Direct King County to develop an expedited permit review process and reduced fees for agricultural structures necessary for farm operations; and
- Support agricultural processing, packing and direct sales to consumers.

Add a new policy to develop and implement a rural economic development strategy.

Amend existing policy to add small businesses to home occupations.

Amend King County zoning code permitted uses in rural areas.

Amend King County Zoning Code to implement the direct agricultural sales policies.

Chapter Five Parks, Open Space and Cultural Resources

Add new policies relating to county owned agricultural land to:

- Lease lands to small-scale and new farmers;
- Require lease holders to use certain environmental farming practices; and
- Recognize funding source restrictions on county owned agricultural lands.

Add new policies to set forth the purposed for use of county owned forest lands including:

- Demonstrating sustainable timber production and progressive forest management;
- Generating revenues to support management;
- Conserving natural resources; and
- Allowing appropriate public use.

GMUAC Amendment

Chapter Three Rural Legacy and Natural Resource Lands

Add a new policy to conduct a demonstration project for tree removal to reduce fire hazards in rural areas.

Amend new rural policy for rural economic development strategy to include an inventory of commercial industrial land.

Amend existing policies to:

- Specify means to notify property owners about resource activities in the vicinity; and
- Require mitigation of environmental impacts from structures and facilities associated with mining operations and add aquatic habitats to list of environmentally sensitive areas.

6.2 Background

While the economic base in King County remains in the urban areas, the rural and resource areas constitute a significant portion of the county's land mass. The Plan seeks to encourage economic development in these areas consistent with the rural and resource land designations.

As a result of farmland preservation and open space bond issues, King County is a major landowner of resource properties in the rural areas and the agriculture and forest production district and management of these properties can contribute to implementation of comprehensive plan policies.

6.3 Analysis

Land appropriate for agricultural production is limited in supply within the county with the most productive areas preserved for long term agriculture in the designated agricultural production districts. These areas are located near urban areas and are frequently without the traditional farm support networks such as processing plants that make an agricultural area economically productive. As a result, the urban area becomes the market for the products. To keep agriculture economically viable, farmers must be able to reduce costs and look for methods to add value to the raw product such as limited processing and packaging for direct consumer sales.

The Executive Proposal adds a new policy to address this economic issue and allows increased non-farming activities on designated agricultural lands. This policy has the potential of converting limited agricultural land to retail or other non-agricultural uses. The proposed zoning regulations to implement the policy limit the impacts but are subject to future pressure to increase the allowed amount of land devoted to retail uses and the types of retail sales as more retail uses seek to locate in agricultural areas.

The GMUAC Amendment adds a new policy to develop a demonstration project for tree removal to reduce fire hazards in rural areas. Extensive tree removal and changes in native vegetation has the potential for significant environmental impacts on wildlife habitat and streams and wetlands, however, as this is a demonstration project rather than an area-wide policy no new impacts are anticipated.

The remaining amendments are generally refinements to existing policies and do not change the direction of the Plan. No new impacts at a non-project level are anticipated as a result of the proposed policy amendments.

7. Transfer of development rights

7.1 Executive Proposal

Chapter Three Rural Legacy and Natural Resource Lands

Amend existing policies to clarify and refine the density transfer program including:

- Clarifying application of transfer applies to private lands in the rural area;

- Eliminating lands with cultural and historic significance as priority transfer sites;
- Removing the credit discount applied to urban sensitive areas; and
- Substituting a conservation easement for the required deed restriction.

7.2 Background

The transfer of development rights program is intended to implement the rural strategy by shifting potential residential density to urban areas.

7.3 Analysis

The amendments are refinement to existing policies that do not change the direction of the program. No new impacts are anticipated at the non-project level as a result of the proposed policy amendments.

8. Water Resources

8.1 Executive Proposal

Chapter Four Environment

Amend existing policies to:

- Adopt critical aquifer recharge areas through code rather than comprehensive plan policy;
- Identify studies to guide decision making;
- Recognize completed water resource studies for Vashon-Maury Island when approving on-site sewage disposal permits; and
- Give direction to the Water Resource Inventory Areas planning process; and
- Recognize the role of Tri-County salmon conservation coalition and shared strategy.

Chapter Seven Services, Facilities and Utilities

Add new policies to:

- Establish an order of preference for new water systems in the rural area;
- Establish limits on exempt wells for rural subdivisions in closed basins;
- Require measuring water withdrawals and diversions by small water systems to meet state standards for water use and resource protection.

Amend existing policies to:

- Allow new public or individual water systems only when no existing class A system is willing and able to provide water with reasonable economy and efficiency;
- Require new water systems in urban areas to connect to existing class A systems that is willing and able to provide water with reasonable economy and efficiency;

- Require existing class A water systems to provide satellite management to new systems within the class A system's water service area;
- Require utility interties for transfer of water resources to be consistent with regional water supply plans and groundwater plans;
- Encourage use of reclaimed water for large water users such as golf courses and cemeteries; and
- Add additional plan consistency requirements to county review of water comprehensive plans.

8.2 Background

Recent changes in state law and judicial decisions have made a number of changes including planning requirements for water purveyors in rural and urban areas, limits on exempt wells and linking water supply planning to watershed and salmon recover planning and resource protection management.

8.3 Analysis

The amendments are refinement to existing policies that do not change the direction of the program beyond the requirements of state law. No new impacts are anticipated at the non-project level as a result of the proposed policy amendments.

9. Heritage resources

9.1 Executive Proposal

Chapter Five Parks, Open Space and Cultural Resources

Amend existing policies to preserve and reuse historic properties by:

- Encourage flexible building and zoning regulations for historic properties;
- Require that the impacts on historic properties by other developments be considered; and
- Clarify existing policies to strengthen protection.

Chapter Six Transportation

Amend existing policy to include historic resource protection in transportation improvement design considerations.

9.2 Background

In 2003 the King County Office of Cultural Resources was abolished and the Clutural Development Authority was created. King County still protectes historic properties through regulations on development.

9.3 Analysis

The amendments are refinements to existing policies that do not change the direction of the program. No new impacts are anticipated at the non-project level as a result of the proposed policy amendments.

10. Transportation General

10.1 Executive Proposal

Chapter Six Transportation

Add new policy for airport safety at King County Airport.

Amend existing policies to:

- Add private funding sources into six year financial plan considerations;
- Clarify when capacity improvements are appropriate in rural areas or on urban freeways or arterials that pass through rural areas; and
- Define roadway safety improvements.

Replace existing policy on transportation mode split with a new policy that does not include the variable goals for individual service areas.

GMUAC Amendments

Chapter Six Transportation

Add new policies to prioritize urban road projects by:

- Targeting barriers to infill, redevelopment, annexation and achievement of growth targets; and
- Existing capacity, operational and safety.

Add a new policy to mitigate impacts of urban arterials that travel through rural areas.

10.2 Background

King County is a regional service provider for transit service county-wide and the local provider of the roadway network in the rural and unincorporated urban areas.

10.3 Analysis

The amendments are refinements to the urban and rural standards for the roadway network and fiscal priorities. They do not change the overall direction of the Comprehensive Plan. No new impacts are anticipated at the non-project level as a result of the proposed amendments.

11. Transportation Level of Service Standards (LOS)

11.1 Executive Proposal

Chapter Six Transportation

Add new policy setting level of service standards for certain minor commercial developments and public and educational facilities as LOS F.

Amend existing policies to:

- Replace travel demand forecasting techniques with consistency with state law and code;
- Redefine the level of service standards for urban areas and rural towns to LOS E and rural areas to LOS B;
- Recognize the six year transit development plan as setting policies for level of services guidelines for transit service; and
- Allow exclusion from rural level of service calculations of new capacity improvements that could increase rural development pressure.

11.2 Background

The Growth Management Act requires that level of service standards (LOS) be set for arterials and transit routes as a means of determining performance of the transportation system. The LOS describes the traffic flow by speed and congestion or delay. LOS ranges from A to E. LOS A is the highest level and represents an unrestricted flow at posted speed limits. LOS B is a stable traffic flow but reflect some impacts on operational speed due to traffic volume. By LOS E, operation is unstable, speeds are reduced and there may be wide fluctuations in traffic movement. LOS F indicates extreme congestion, very slow speeds and long delays at intersections.

11.3 Analysis

The existing policies determine LOS by means of a Transportation Adequacy Measure (TAM) score applied in five geographic areas known as Transportation Service Areas (TSA). The LOS of the TSAs range from B to E. The Executive Proposal eliminates both the TAM and TSA replacing them with a LOS E in the urban area, LOS B in the rural area and LOS F for "certain minor residential and minor commercial developments along with certain public and educational facilities" in both the urban and rural areas.

The proposal represents no change for rural areas. All rural areas are currently within TSA 5 which has a TAM score of LOS B. Two of the urban TSAs will experience a decline in LOS. TSA 4 has a current TAM score of LOS C and TSA 3 has a current TAM score of LOS D. Both of these will be reduced to LOS E. This will result in more congested traffic flows and delay at intersections in these areas.

Previous environmental documents reviewing Comprehensive Plan policies have identified traffic congestion as having significant impacts on air quality as vehicles that are idling tend to produce more emissions than vehicles operating in free moving traffic. There are several mitigating factors to the impacts of increased congestion. To the extent, that increased congestion and improved transit mobility made transit an attractive option to current single-occupant commuters, total vehicle miles traveled may be decreased. Continuing improvements in vehicle engine technology, including hybrid cars which produce fewer emissions when idling and at slow speeds, may also off-set the effects of increased congestion. Finally, amendments to Comprehensive Plan policies and regulations which facilitate increased pedestrian mobility and non-motorized options, such a bicycling, may also affect vehicle miles traveled, particularly on short, non-commute trips.

While the amendments change the method of implementing LOS requirements they constitute refinements that do not change the overall direction of the Comprehensive Plan. No new impacts are anticipated at the non-project level as a result of the proposed amendments.

12. Transportation Concurrency Management

12.1 Executive Proposal

Chapter Six Transportation

Add new policies relating to transportation concurrency management including:

- Adopting a two part test involving averaging congestion over a wide area and looking at specific corridors;
- Requiring new development proposals to pass both parts of the test to receive a certificate of transportation concurrency; and
- Requiring transportation improvements to be in place or funded in an adopted six year capital improvement program for test to be met.

12.2 Background

The Growth Management Act includes a transportation concurrency requirement to ensure that transportation infrastructure is developed concurrent with the impacts of new development. The Act specifies that concurrent is within six years. Local jurisdictions are required to prohibit approval of new developments if the development's traffic impacts will cause a the affected transportation system to decline below the adopted LOS standard and new infrastructure is not available.

12.3 Analysis

The existing concurrency policies adopt Transportation Service Strategies in five geographic areas called Transportation Service Areas (TSA). The strategies are intended

to ensure that infrastructure is available to support new development and achieve LOS standards.

The Executive Proposal eliminates the TSA and the strategies and replaces them with three new policies. The new policies require a two part concurrency test using "area-wide averaging of roadway congestion and congestion in specific corridors. New developments must meet both parts of the test and improvements must be funded in the adopted six-year capital improvement program.

The amendments change the method of implementing how concurrency is determined including new policies specifying the test to be used. The policies constitute refinements that do not change the overall direction of the Comprehensive Plan. No new impacts are anticipated at the non-project level as a result of the proposed amendments.

Determination of adequate urban capacity

Executive Proposal

Comprehensive Plan Technical Appendix D Growth Targets and the Urban Growth Areas

Update Technical Appendix D to include the analysis of growth to be accommodated in the urban growth area and land capacity.

Background

The GMA requires the designation of an urban growth area that is sufficient to permit the urban growth that is projected to occur in the succeeding twenty years and to allocate that growth among the jurisdictions within the county. The allocation is done in conjunction with the cities through the formulation and adoption of Countywide Planning Policies.

The first policies were adopted in 1994 for the twenty year period from 1992 to 2012. The Washington State Office of Financial Management (OFM) issued a population forecast for the purpose of determining the twenty year growth forecast. The population forecast was converted to a household forecast to determine the number of dwelling units that were needed to house the projected population. Growth targets were then determined for each jurisdiction. Although not required by the GMA, employment targets were also established for each jurisdiction based on forecasted job growth provided by the Puget Sound Regional Council.

A table setting forth the household growth ranges by unincorporated urban subareas was included in the urban chapter of the plan. This table has been amended in previous plan updates to reflect changes in the targets due to the reduction in urban unincorporated land area through annexations and incorporations.

The GMA requires that the urban growth area be evaluated every ten years to determine if there is adequate capacity for the twenty year forecast. In January 2002, OFM issued a new population forecast beginning in 2000 and continuing beyond twenty years. The new forecast was again translated into households and 90% was allocated to jurisdictions and unincorporated urban areas. The remaining 4% for growth was allocated to areas outside of the designated UGA. The new targets are for the twenty year period from 2002 to 2022 and were recommended by the Growth Management Planning Council and adopted by King County Ordinance 14653 and ratified by the cities. A SEPA determination of nonsignificance was issued for the ordinance.

In 1997, The GMA was amended to require the county and cities to determine the amount of land suitable for urban development and to evaluate the capacity for growth based upon five years of actual development activity. Called the "buildable lands" evaluation, the county was required to report this capacity to the state by September 1, 2002 and every five years thereafter. The evaluation included the translation of the OFM population forecasts into households. This was used by the Growth Management Planning Council to determine the household targets included in the plan.

Analysis

The King County Buildable Lands Evaluation Report (Evaluation) dated September 2002, determined that as of that date the UGA contained 26,869 adjusted net acres of residential land potentially available for development ("residential land supply"). The UGA includes all incorporated jurisdictions and the urban unincorporated areas.

Adjusted net acre of residential land supply were derived by determining the gross acres zoned for residential development that were vacant or re-developable and deducting undevelopable portions including critical areas, land needed for road rights-of-way and other public purposes. The net acreage was then adjusted by a market factor that accounted for lands that were unlikely to reach the market and be available for development by 2012. Because market factors are not consistent throughout the UGA, the factor was determined by each jurisdiction, using common guidelines, to reflect the marketability of subareas.

The Evaluation determined that about one third of the UGA's total residential land supply was located in land zoned for single family development. The density of the single family zones varied from 2 units an acre to 8 units with an average of 3.8 units per acre. The remaining supply is in land zoned multifamily or mixed use. The density of these zones varies from 8 units per acres to in excess of 48 units per acre. The average density was 22 units per acre.

The distribution of each type and density ranges varied by jurisdiction and in each of the four urban subareas: East County, Sea-Shore, South County and Rural Cities. Of the total residential land supply, 43% was vacant and 57% was potentially re-developable.

The number of housing units that could be accommodated in the urban residential land supply was calculated by each jurisdiction. The jurisdiction first calculated the potential density based on the zoning designation. The jurisdictions recent development history was examined to determine whether the zoned density was actually likely to be achieved.

It was determined that the total urban residential land supply had capacity for 263,277 units. Single family zones had capacity for 79,743 units. Multifamily and mixed-use zones had capacity for 165,144 units. Urban planned developments, the UGA around rural cities had capacity for an additional 18,391 units. The Evaluation also calculated the capacity for each of the four UGA subareas.

The 2000-2022 UGA growth targets set a total urban residential housing target of 151,932 units. This target is well within the 263,277 capacity of the UGA as determined by the Evaluation. In allocating the targets to individual jurisdictions, the Growth Management Planning Council considered, among other factors, each jurisdiction's residential land capacity in the Evaluation. Some jurisdictions may have to adjust zoning densities of single family or multifamily lands to achieve individual targets but overall adequate capacity exists within the UGA to accommodate the twenty year OFM growth forecast.

Map Amendments

Map Amendment 1—Cottage Lake

Executive Proposal

Change one 2.4 acre parcel from Rural Residential designation to the Cottage Lake Rural Neighborhood designation and rezone to Neighborhood Business (NB-P). Retain the existing p-suffix development condition.

GMUAC Amendment

Change three parcels consisting of a total of approximately 1.5 acres from Rural Residential designation to the Cottage Lake Rural Neighborhood designation and rezone to Neighborhood Business (NB-P). Retain the existing p-suffix development condition.

Background

Comprehensive Plan policies define rural neighborhoods as small scale business areas that provide shopping and services to the surrounding rural community. Expansion of the boundaries requires a subarea planning process. (R-409) Land suitable for residential development within a rural neighborhood should be zoned for residential development. (R-410)

Analysis

The Cottage Lake Rural Neighborhood consists of approximately five parcels of property located on three of the four corners of the intersection of Avondale Road NE and NE Woodinville-Duvall Road. The fourth corner and all of the area surrounding the rural neighborhood is zoned rural residential. A subarea plan was conducted for the rural neighborhood and surrounding parcels and one parcel is proposed for redesignation in the Executive Proposal. The GMUAC Amendment redesignates three additional parcels.

The parcel proposed for redesignation in the Executive Proposal is located on the northeast corner of the intersection, the only corner not currently within the Rural Neighborhood. The parcel is currently developed with a church, a permitted non-residential use in the comprehensive plan and zoning designation. The parcel is oriented toward the existing commercial development within the Rural Neighborhood. Adjacent to the parcel proposed for redesignation are four parcels currently developed with single family residences. These parcels are above the grade of the church parcel and are oriented toward a residential neighborhood on a different street access.

Two of the parcels in the GMUAC Amendment are located just south of the southwest corner of the intersection. The parcels are currently developed with single family residences which are oriented toward Avondale Road SE. Adjacent to the parcels to the south are single family residences also oriented to Avondale Road SE. Adjacent to the parcels to the west are single family residences which are oriented toward a single family neighborhood on a different street access. Adjacent to the parcels to the north is a parcel within the Rural Neighborhood Center that is developed with a convenience store. The parcels show evidence of being impacted by the intersection and the adjacent commercial use. The widening of the intersection has left the northernmost parcel on the curve of the intersection. There is some evidence that the graveled lot of the convenience store has spilled into the front yard of the lot for use as parking or ingress and egress to Avondale Road SE.

The third parcel in the GMUAC Amendment is developed with a gas station and convenience store and is not contiguous to the existing Rural Neighborhood. It is located on the north side of NE Woodinville-Duvall Road to the west. Approximately four lots are located to the east between the parcel and the Rural Neighborhood on the same road frontage. Three other lots, located behind the frontage lots, also access the frontage. Most of the lots are developed with single family residences. The lot adjacent to the parcel is developed with a church. To the immediate north and west of the parcel are single family residences that access the frontage. A King County park is located on the south side of NE Woodinville-Duvall Road. The park frontage extends the entire distance from the Rural Neighborhood to the parcel.

The parcel in the Executive Proposal is currently in a non-residential use oriented toward the commercial area. The expansion of the Rural Neighborhood in this direction is unlikely to serve as a precedent for additional conversion of surrounding rural residential areas which are at a different elevation and access a different street. Expansion of the Rural Neighborhood on southeast corner of the intersection in the GMUAC Amendment would allow the redevelopment to non-residential use. The redevelopment has the

potential to transfer the commercial impacts to residential areas to the south and west. These impacts can be reviewed and mitigated during any development proposals. There is also the potential continued expansion of the Rural Neighborhood to the south along Avondale Road SE.

The third parcel in the GMUAC Amendment is currently in a commercial use but it is not contiguous to the boundaries of the Rural Neighborhood. The redesignation of a non-contiguous parcel sets a precedent for redesignation of all of the parcels located between the parcel and the Rural Neighborhood that access NE Woodinville-Duvall Road. Only one of these intervening lots is currently in a non-residential use. Expansion on the south side of NE Woodinville-Duvall Road is precluded by the county park.

The Comprehensive Plan sets no policy guidance for the size of a Rural Neighborhood. The only policy direction on expansion is located in E-409 which states in part that an expansion shall not be permitted except through a subarea plan. Expansion and redevelopment of the Rural Neighborhood to all of the intervening lots could have significant environmental impacts on the rural area based on the availability of infrastructure to handle the more intense commercial uses.

The remaining proposals do not have an impact at the non-project level. Impacts of the commercial redevelopment of the proposed sites can be analyzed at the project level.

Map Amendment 2—Duvall Rock Quarry

Executive Proposal

Change comprehensive plan designation of 79.7 acres from Mining to Rural Residential and rezone to Rural Residential – one unit per ten acres (RA-10). Remove potential M zoning on adjacent property. Amend Mineral Resource map to show sites as Potential Surface Mineral Resource Site.

Background

In 1995, this site was designated a Mineral Resource Site, designated as Mining on the Comprehensive Plan Land Use Map and zoned Mineral with a P-suffix condition that the zoning would revert to RA-10 if an environmental study for mineral resource use was not commenced within two years. An adjacent parcel to the west was zoned RA-10 potential mining.

In 1998 an application for a permit to mine andesite from the property was submitted. A determination of significance was issued in 2002 requiring an environmental impact statement (EIS) for the proposed mining. Progress on the EIS was intermittent and on October 16, 2003 the permit was denied because the applicant did not provide information requested..

Comprehensive Plan Policy R-555 directs the County to re-evaluate the comprehensive plan designation and zoning of any site that has been denied a permit to extract minerals resources. Policy R-206 sets out the criteria for designating lands within the rural area R-10.

Analysis

The 79.7 acre parcel is located just east of State Route 203 about two miles north of the city of Duvall. The property is undeveloped and is roughly rectangular in shape with the western boundary formed by John McGee Road No. 978, an unimproved, unpaved road.

The western one-third of the property, from the northern border to the southern border, consists of the eastern wall of the Snoqualmie and Cherry Valleys. The elevation at the road is about 100 feet mean sea level (MSL). The wall rises steeply to the east to about 400 feet MSL, then rises vertically to 500 feet MSL. The remainder of the property slopes gradually upward to the east and north becoming nearly flat near the eastern property line. The eastern elevation ranges from 520 feet MSL at the southeast corner to 740 feet MSL at the northeast corner.

Hanstead Creek runs east to west bisecting the property. The creek is a class 2 perennial stream. The creek drains over the valley wall at McCauley Falls then flows into Cherry Creek. Cherry Creek flows off site near the western boundary of the property through a class I wetland then into the Snoqualmie River.

Environmental studies for the permit application and the uncompleted EIS found the site to be undeveloped with most of the site in upland deciduous, closed canopy forest. There are several small wetlands near the eastern edge of the property. Numerous wildlife species were observed on or near the site, including species of concern called out by comprehensive plan policy. Other species are likely to use the site. Cherry Creek is a salmonid bearing creek with resident and migratory fish species including Chinook, coho, winter steelhead and chum salmon. A coho salmon was found in Hanstead Creek during electroshock tests in 1997.

The predominant mineral resource on the site is andesite. Andesite is commonly used as crushed gravel in construction, particularly road beds. The location of Hanstead Creek bisecting the property made mining proposals difficult to achieve without relocating the stream or impacting the stream and downstream waters. Although environmental review was not completed for the project, it is unlikely that economical mineral extraction could be accomplished.

Removing the mineral resource site designation and redesignating the site from mining to rural residential will not have an impact at the plan level. The redesignation is unlikely to affect the supply of mineral resources in King County. The forest zone is available for mineral extraction and other andesite deposits exist within the zone. However these sites may be further from construction activities predominately located in the urban area thus potentially requiring more transportation of mined material and causing impacts such as

congestion, noise and dust. Elimination of the potential M zone from the property to the west of the site is also consistent with comprehensive plan policies. This property is mostly wetland and was never included in the mineral resource site designation.

Designating the property Rural Residential zoned RA-10 is consistent with comprehensive plan policy R-206. The adjacent properties along the valley wall are designated RA-10 with RA-5 to the east. Impacts from residential development of the property would be evaluated at the project level.

Map Amendment 3 -- Willows Road

Executive Proposal

Change comprehensive plan designation of 128 acres from Rural to Greenbelt/Urban Separator and Urban Residential, Medium density. Rezone Greenbelt portion to residential – one unit per acre special district overlay (R-1-SO and R-1-P-SO). Rezone Urban Residential portion to Residential – six units per acre, special district overlay (R-6-SO). Add area to the city of Kirkland potential annexation area.

Background

To protect the Sammamish River Valley agricultural areas, in 1981 the Northshore Community Plan designated a buffer consisting of low density (R-1) residential development in an area approximately one half mile wide on the eastern and western edges of the valley. The 1985 King County Comprehensive Plan designated the valley as an agricultural production district. When the Northshore Community Plan was updated in 1991, the western portion of the residential buffer was significantly reduced. The northern portion was subsequently incorporated into the City of Woodinville. The 128 acre Willows subarea was zoned low density rural (AR-5-P). With the adoption of the 1994 Plan and the new zoning code, the area was designated rural and zoned a mix of RA 2.5 and RA 5 with an Agricultural Production Buffer Special District Overlay.

King County Comprehensive Plan policy R-103 recognizes that the rural area is considered to be permanent and is not to be redesignated to urban growth area until reviewed pursuant to the growth management act and Countywide Planning Policy FW-1. Countywide Planning Policy FW-1 sets out a process to set urban density targets, to review and evaluate their achievement and criteria to redesignate rural land to urban.

King County Comprehensive Plan policy U-102 sets forth the criteria for designating land as urban and King County Comprehensive Plan policy R-102 sets forth the criteria for designating lands as rural.

Analysis

Only the 128 acre Willows subarea remains of the original buffer intended to protect the Sammamish agricultural area. North of the subarea is the City of Woodinville. To the

west is unincorporated urban area developed in medium and high-density residential. To the south is urban area zoned and developed as industrial. A narrow strip of industrial land extends along approximately two thirds of the eastern border of the subarea between the subarea and the agricultural production district. Only a small portion of the eastern boundary is contiguous to the agricultural production district. This area is physically separated from the agricultural production district land by a steep slope and a rail road right of way.

The proposal meets the criteria of Countywide Planning Policy LU 26 and King County Comprehensive Plan U-102, which are substantially similar for designation as urban. The subarea can be efficiently and cost effectively served by urban services within a twenty year time frame. The King County Buildable Lands Evaluation Report indicates that there is sufficient development capacity within the urban growth area to accommodate the projected housing needs. The steep slope and the rail road right of way serves as a natural edge for the majority of the area. The portion that is east of this natural edge will be designated at the lower urban density of urban greenbelt. There are no significant environmental constraints to providing urban growth at the non-project level. Impacts of specific proposals will be reviewed at the project level.

The proposal does not meet the criteria of King County Comprehensive Plan policy R-102 for designation as rural. There is no opportunity for significant farming or forestry. The portion of the subarea to the west of the steep slope does not serve as a buffer for the agricultural production district from conflicting urban uses. The small portion east of the railroad right of way, which is contiguous to the agricultural production district, will be designated urban greenbelt to perform this buffer function. There are no physical barriers to providing urban services at a reasonable cost to the subarea. The steep slope provides a logical boundary for urban public services and infrastructure. The area does not have outstanding scenic, historic, environmental, resource or aesthetic values that are best protected by a rural area designation. There are no significant environmental constraints that make the area unsuitable for intensive urban development at the non-project level.

Redesignation of the area from rural to urban will not set a precedent for other redesignations of rural land contiguous to the urban growth area. The unique physical characteristics of the subarea contribute to the incompatibility with the criteria for rural designation and the compatibility with the criteria for the urban designation. This combination of steep slopes and rail road right-of-way forming a natural physical barrier is unlikely to serve as a precedent for redesignating other rural areas next to resource lands. The redesignation to urban will not have a significant impact at the non-project level. Impacts of specific proposals will be reviewed at the project level.

Map Amendment 4—Redmond Perrigo Park

Executive Proposal

Change comprehensive plan designation of 25 acres from Rural to Urban Other Parks/Wilderness and rezone to Urban Reserve – one unit per five acres (UR-5). Add area to the city of Redmond potential annexation area.

Background

The city of Redmond has owned a group of parcels for use as a park site prior to the 1994 adoption of the urban growth area. The park site is split by the urban growth boundary.

King County Comprehensive Plan policy U-103a allows redesignation of rural areas adjacent to cities for park purposes only when the property is no more than thirty acres and was owned by the city prior to 1994. Countywide Planning Policy CC-11 directs the county to work cooperatively with the city to ensure the provision of parks and open spaces.

Analysis

The proposed redesignation from rural to urban for the purpose of annexation by the City of Redmond and development of a park is consistent with King County Comprehensive Plan policies and Countywide Planning policies. The proposed redesignation was provided for in the King County Comprehensive Plan and will not establish any contrary precedents for redesignation of rural areas.

The redesignation will create an irregularity in the urban growth boundary by creating a peninsula of urban land jutting into a rural residential area. The park is currently developed with athletic fields, parking area and restrooms.

The redesignation will have no impacts at the non-project level. The impacts of the park on the surrounding rural areas should be addressed if there is any increase in the intensity of the use.

Map Amendment 5—Redmond Ridge Panhandle

Executive Proposal

Change comprehensive plan designation of 123 acres from Urban Planned Development to Rural Residential and rezone to Rural Residential – one unit per five acres (RA-5). Remove from Urban Area.

Background

This property was included in the Bear Creek Community Plan as master plan development (MPD) with the condition that the area would revert to rural if the development was denied or not pursued. The designation as an Urban Planned Development (UPD) and the community plan conditions were incorporated into the 1994 King County Comprehensive Plan in policy CP-102. The property owner is no longer proposing the subject area for urban development.

Analysis

The property is environmentally constrained and would be difficult to extend urban infrastructure into the area. The property is not currently served by sewers and there is no direct access to the rest of the UPD.

The possibility that the land could be removed from the Urban Growth Area was contemplated in 1994 when the Urban Growth Area was designated. Urban capacity will not be significantly affected by the redesignation to rural. There is no significant impact at the non-project level. Impacts from rural residential development of the subject area should be considered at the project level.

Map Amendment 6—Cougar Mountain

Executive Proposal

Change comprehensive plan designation of .6 of an acre from Rural to Urban Residential, Low and rezone to Residential – one unit per acre (R-1). Designate the parcel as potential annexation area for the city of Bellevue.

Background

The Cougar Mountain Regional Wildland Park is located in unincorporated rural area and forms a portion of the urban growth boundaries for the cities of Newcastle, Bellevue and Issaquah.

Analysis

The parcel consists of .6 of an acre, in the shape of a right triangle, located in the corner of the Cougar Mountain Regional Wildland Park. The hypotenuse of the triangle is formed by 166th Way SE which divides the parcel from the rest of the park. The other two legs of the triangle form the urban growth boundary with the city of Bellevue.

Redesignation of the .6 of an acre from urban to rural will not have a significant impact on the park or on the rural area. The parcel is isolated from the rest of the park by the road and is so small that it does not serve a useful purpose as part of the park. It is surrounded on the other two sides by the city of Bellevue and is likely to be annexed and

developed with the surrounding property. The redesignation is unlikely to serve as a precedent for redesignation of future urban or park property.

Map Amendment 7—East Renton Urban Separator

Executive Proposal

Change comprehensive plan designation of 76 acres from Urban Separator to Urban Residential, Medium density and rezone to Urban Residential – six units per acre with existing special district overlay (R-6-SO).

Background

Urban separators are permanent low-density areas that, among other uses, protect environmentally sensitive areas, create open space corridors within and between urban areas which provide environmental, visual, recreational and wildlife benefits. Countywide Planning Policy LU-27 calls for the designation of urban separators within the cities and unincorporated King County urban areas. King County designated this 76 area within the city of Renton potential annexation area as urban separator. Subsequently, the city of Renton has designated 119 acres in the general vicinity within the city as urban separator. Approximately 52 of the 119 acres are adjacent to the area in unincorporated King County being redesignated. Most of the 119 acres form a contiguous urban separator. In 2002, the Growth Management Planning Council approved a modification of the urban separator map in the Countywide Planning Policies to delete the 76 acres in the unincorporated potential annexation area and add the 119 acres within the city.

Analysis

The 76 acres constitute a rough "L" shaped area. The area is contiguous to the city of Renton on the northern, southern and most of the western boundary of the "L." The remainder of the western boundary is unincorporated King County mostly developed with high density residential. Within the urban separator are some higher density developments and some large lots that are capable of redevelopment. The area is located on a ledge above a steep slope and is free of environmental constraints that would preclude development at a higher urban density than the urban separator designation. The additional residential density is not needed to meet urban capacity.

The area being designated as urban separator in replacement for the subject area is consistent with countywide policies. The area is environmentally sensitive including steep slopes and wetlands on the valley floor. Most of the areas are contiguous and will provide a connected open space corridor.

The increased amount of acreage in urban separator and the proximity in location will offset any impacts at the non-project level on the redesignation from urban separator in unincorporated King County and the replacement with designated urban separator within

the city of Renton. Impacts from increased urban density will be addressed at the project level.

Map Amendment 8—Enumclaw Golf Course

Executive Proposal

Change comprehensive plan designation of 200 acres from Rural to Rural City Urban Growth Area and rezone to Urban Reserve – one unit per five acres. Amend the boundary of the Forest Production district to remove 2.5 acres. Add area to the city of Enumclaw potential annexation area.

Background

The proposal consists of three parcels constituting approximately 200 acres developed as a golf course. Two of the parcels are designated rural residential and zoned RA-10. One parcel, approximately 2.5 acres, is designated forestry and is also zoned RA-10. The parcel is developed as a golf course and is physically separated from the forest production district by state highway right-of-way.

The golf course is contiguous to the city of Enumclaw. Ownership of the golf course has been transferred to the city by interlocal agreement approved by ordinance.

Proposed King County Comprehensive Plan policy U-103a allows redesignation of rural areas adjacent to cities for park purposes when the property is a King County park that is being transferred to the city through a park transfer agreement. Countywide Planning Policy CC-11 directs the county to work cooperatively with the city to ensure the provision of parks and open spaces.

Analysis

Under the Growth Management Act, the city of Enumclaw is only able to annex the golf course to the city if it is designated urban. Ownership of the golf course has been transferred to the city with a deed restriction that limits development in perpetuity to park purposes. The redesignation is not likely to set a precedent for redesignation of rural land since the comprehensive plan contemplated that King County Parks adjacent to cities could be redesignated from rural to urban if ownership of the park changed. There is no significant impact at the non-project level. Since the use of the land being redesignated is not changing there will be no new impacts on adjacent rural areas.

Map Amendment 9—Covington Park

GMUAC Amendment

Change comprehensive plan designation of approximately 29.7 acres on four parcels from Rural Residential to Other Parks/Wilderness and rezone to UR-SO

Background

The city of Covington was incorporated in 1997 and subsequently purchased the parcels for park purposes. The Executive and Hearing Examiner had reviewed this proposal and recommended denial based on existing comprehensive plan policies.

Proposed Comprehensive Plan policy U-103a limits redesignation of rural property for park purposes to property purchased before the adoption of the 1994 Plan or transfer of an existing King County Park. A GMUAC Amendment to U-103a will allow redesignation of rural properties that are immediately adjacent to a city and are planned for park purposes when the property is no more than 30 acres and is part of a park transfer agreement between King County and a city.

Analysis

The parcels are located on the southwest corner of the "T" intersection of SE 240th St. and 180th Ave. SE. The southeast corner of the intersection is designated urban, developed with low density single family residences and was incorporated by the city of Covington. The northeast quadrant of the intersection is designated urban and is unincorporated. The property is developed with a high school and a county owned pool that is being transferred to the city. The northwest quadrant is rural residential. The property to the west and south of the parcels are designated rural residential and are developed with low density residential.

The urban growth boundary has a number of irregularities in this area that are not determined by natural features. There was some attempt in earlier community plans, predating the 1985 and 1994 comprehensive plan designations to buffer streams by low intensity residential development which has left this area with a convoluted boundary between urban and rural areas. These irregularities often create peninsulas of urban development surrounded by rural lands or rural development surrounded by urban. Without a natural feature to define the boundary the designations can appear arbitrary to residents and, without proper buffering, can lead to incompatible land uses. This redesignation will create another urban peninsula. If the park is developed for intensive recreational uses this could have an impact on the surrounding rural areas.

The amendment will be consistent with the King County Comprehensive Plan only if the GMUAC proposed amendment to policy U-103a is adopted and the property is part of a park transfer agreement. The impacts of the park on the surrounding rural areas should be addressed during review of the park development.

Map Amendment 10—Dale Frank Property

GMUAC Amendment

Change comprehensive plan designation of 5.9 acres from Industrial to Urban Residential, Medium and rezone to Industrial, special district overlay (I-SO) potential Residential – twelve units per acre (R-12-SO).

Background

The undeveloped parcel is designated Industrial in the comprehensive plan and zoned for industrial uses. The property owner received a building permit to construct one office building and two, one-story self-storage buildings on the site but has elected not to develop the property. The parcel is located within the potential annexation area for the city of Kirkland. Kirkland has not adopted a comprehensive plan for the subarea.

Comprehensive plan policies seek to protect existing industrial uses within the urban growth area that are outside unincorporated activity centers and to preserve and plan for an adequate supply of industrial and commercial land. One of the preservation techniques includes preventing the encroachment of non-industrial uses on industrially-zoned land and the rezoning of industrial land to other uses. Policies also discourage the approval of zoning changes to increase residential development within the urban area unless the development will be compatible with the character and scale of the surrounding neighborhood, urban public facilities and services are adequate, and the proposal is consistent with the comprehensive plan, applicable subarea plans and adopted city comprehensive plans for the potential annexation area where the rezone is located.

Analysis

The parcel is approximately 6 acres of undeveloped land located on a hillside north of NE 126th Place. The parcel is designated industrial on the Comprehensive Plan Land Use Map and zoned industrial. South of NE 126th Place is developed industrial located below the grade of the parcel. The western boundary of the parcel is 132nd Ave NE and the city limits of Kirkland. Undeveloped industrial zoned properties are located west of 132nd Ave NE within the city. North of the parcel is developed single family residential zoned property located on an upland plateau. East of the parcel are industrial designated and zoned parcels that are similar in topology to the parcel.

The parcel contains some mature trees and two drainage courses that are regulated streams. Mapped erosion and landslide hazard areas exist on the site. Utility services are available to the site. Transit services are nearby.

The parcel and the similarly designated industrial sites to the east and west serve as a transition area between the residentially developed uplands and the industrial development below. Development of the transition area for either industrial or residential use has a potential to impact the adjacent existing uses.

NE 126th, which serves as the southern boundary for the transitional area is mostly used as an industrial access route. The topology of the area makes intensive industrial development problematic. Development of the area as residential will need to consider the noise, dust, fumes and visual aesthetics of the industrial uses below.

Comprehensive Plan policies direct the protection of existing industrial uses, the preservation of an adequate supply of industrial land within the urban area and prevention of the encroachment of non-industrial uses on industrially-zoned land. The existing industrial uses are not affected at the non-project level from this reclassification. The recent Buildable Lands Evaluation Report analysis indicates that adequate industrial lands exist and redesignation of this parcel is unlikely to affect industrial capacity.

Redesignation of this parcel could serve as a precedent for the redesignation of the similarly situated parcels in this transition area. It also increases the risk of encroachment of non-industrial uses into industrial areas as well as the potential for conflicts between industrial and residential uses. While conflicts in uses can be addressed at the project level the conflicts may be intensified by not considering the similarly situated parcels in one study at the non-project level.

Map Amendment 11—Sammamish Plateau Access Road North Link

GMUAC Amendment

Change comprehensive plan designation of approximately 8.8 acres on five parcels from Rural Residential to Urban Residential and rezone to R-4. Change comprehensive plan designation of approximately 2,438 square feet from Urban Residential, Low Density to Rural Residential and rezone to RA-5P.

Background

The construction of the Sammamish Plateau Access Road North Link split a number of parcels and created new segments that are now divided by the highway. They are no longer contiguous to the rural area and constitute an island of rural land between the city limits and the roadway. One of the parcels contains the drainage facility for the roadway which will be maintained by the city of Issaquah but cannot be annexed with a rural designation.

A narrow strip of a rural parcel in the same area was inadvertently designated urban while the remainder of the parcel is rural.

Analysis

The amendment redesignates some parcels that were split by the construction of a public right-of-way and is unlikely to serve as a precedent for redesignation of general rural areas. There are no impacts at the non-project level. Impacts of development of the

parcels will be reviewed at the project level. The amount of land redesigned from urban to rural is small and will have no impact on urban capacity.

Map Amendment 12—Renton Christian Center

GMUAC Amendment

Change comprehensive plan designation of approximately 2 acres on two parcels from Rural Residential to Urban Residential Medium Density and rezone to R-6 SO retaining the special overlays. Change comprehensive plan designation of approximately 4 acres of county-owned property from Rural-King County Owned Open Space/Recreation to Urban-King Urban Open Space/Recreation and rezone to R-6-SO.

Background

Comprehensive Plan polices call for designated rural land to be permanent and not redesignated to urban until reviewed pursuant to the Growth Management Act and Countywide Planning Policies.

Analysis

The proposal consists of three parcels located in a narrow band between SE Petrovitsky Road and Old Petrovitsky Road.

SE Petrovitsky Road forms the urban growth boundary and the northern boarder of the parcels. The road curves to the south and also serves as the eastern boundary of the parcels. An oxbow in Old Petrovitsky Road forms the southern boundary of the property. Old Petrovitsky Road serves as a private access road to the parcels south of the road.

The western parcel consists of approximately four acres and is owned by King County as open space. The parcel is forested. The western boundary of the property is the urban line with the adjacent property designated urban residential. The parcels adjacent to SE Petrovitsky Road are developed with single family residences while the remainder is mixed forest. South of this parcel is forested, undeveloped open space.

The eastern parcels consist of just over 2 acres. The largest parcel is 1.9 acres and is developed with a church. South of these parcels is county owned property developed with county facilities.

The urban area to the north and east of SE Petrovitsky Road is developed with an elementary school, park facility, a new residential subdivision and a junior high school. Except for the county facilities, the rural area to the south of Old Petrovitsky Road is forested area surrounding the city of Seattle Lake Youngs water reservoir.

On a larger scale, urban growth boundary follows the northern perimeter of the water reservoir. When the perimeter meets the western border of this parcel at Old Petrovitsky

Road the urban line jogs north to SE Petrovitsky Road then follows the road east. The three subject parcels are uniquely situated between the two roads on the rural side. Redesignation to urban will have no significant effect on the rural area at this location. The county property will remain open space and unchanged. The developed parcels are surrounded by county owned parcels and roadway and have no room to expand beyond their boarder. The redesignation will not serve as a precedent for redesignation of other properties in the area.

APPENDIX A

DISTRIBUTION LIST

Federal Agencies

U.S. Army Corps of Engineers
U.S. Environmental Protection Agency
U.S. Dept. of Fish and Wildlife

Tribal Entities

Muckelshoot Indian Tribe
Puyallup Indian Tribe
Tulalip Indian Tribe
Snoqualmie Indian Tribe
Suquamish Indian Tribe

State of Washington

Department of Community, Trade and Economic Development
Department of Ecology
Department of Fish and Wildlife
Department of Natural Resources
Department of Transportation

Regional Agencies

Puget Sound Clean Air Agency
Puget Sound Regional Council

King County

Ron Sims, King County Executive
 Office of Regional Policy and Planning
 ESA Policy Coordination Office
 Office of Cultural Resources

Carolyn Edmonds, King County Councilmember
Bob Ferguson, King County Councilmember
Kathy Lambert, King County Councilmember
Larry Phillips, King County Councilmember
Dwight Pelz, King County Councilmember
Rob McKenna, King County Councilmember
Peter Von Reichbauer, King County Councilmember

Dow Constantine, King County Councilmember
Steve Hammond, King County Councilmember
Larry Gossett, King County Councilmember
Jane Hague, King County Councilmember
David Irons, King County Councilmember
Julia Patterson, King County Councilmember

Office of the Prosecuting Attorney
Department of Housing and Community Development
Department of Development and Environmental Services
Department of Natural Resources and Parks
Department of Transportation / Road Services Division

Organizations

American Planning Association
Center for Environmental Law & Policy
East Lake Washington Audubon
King County Building Trades Council
League of Women Voters of Washington
League of Women Voters, King County South
League of Women Voters, Lake Washington East
League of Women Voters, Seattle
Master Builders of King & Snohomish Counties
Property Rights Alliance
Puget Sound Energy
Puget Sound Transit Consultants
Rainier Audubon Society
Seattle-KC Association of Realtors
Seattle Transportation Choices
Sierra Club
Snoqualmie River Valley Audubon
Suburban Cities Association
University of Washington - Department of Urban Design and Planning
Washington Conservation Voters
Washington Environmental Council
Washington Wilderness Coalition
WASHPIRG

Community Councils

Bear Creek/Union Hill Community Council
Four Creeks Unincorporated Area Council
Greater Maple Valley Area Council
North Highline Unincorporated Area Council
Vashon-Maury Island Community Council

West Hill Community Council

Public Review Locations

Algona-Pacific Library
Auburn Library
Bellevue Regional Library
Black Diamond Library
Bothell Regional Library
Boulevard Park Library
Burien Library
Carnation Library
Covington Library
Des Moines Library
Duvall Library
Fairwood Library
Fall City Library
Federal Way Regional Library
Federal Way Library
Foster Library
Issaquah Library
Kenmore Library
Kent Regional Library
King County Library System
Kingsgate Library
Kirkland Library
Lake Forest Park Library
Lake Hills Library
Maple Valley Library
Mercer Island Library
Muckelshoot Library
Newport Way Library
North Bend Library
Redmond Regional Library
Richmond Beach Library
Sammamish Library
Service Center
Shoreline Library
Skykomish Library
Skyway Library
Snoqualmie Library
Tukwila Library
Valley View Library
Vashon Library
White Center Library
Woodinville Library

Woodmont Library

Newspapers

Seattle Times

Smart Growth Citizen Advisory Committee

Mike Arnoff
Margot Blacker
Tracy Burrows
Lynn Davison
Rose Galloway
Ron Kasprisin
Ken Konigsmark
Terry Lavender
Chuck Maduell
Peter Orser
David Owens

Commentors

Daniel O. Carnite
Maxine Keesling
Frederick M. Isaac
Judith L. Isaac
Alison Moss, Dearborn & Moss
Conrad Roseburg
Kelly Snyder, Roth Hill Engineering Partners
Ole Una
Susan Kaufman-Una
Greg Zimmerman, City of Renton