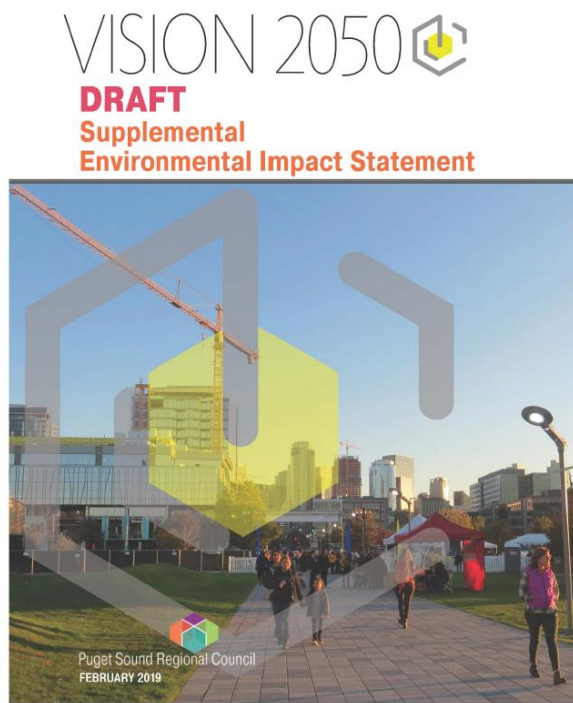


VISION 2050

Draft Supplemental Environmental Impact Statement Combined Public Comments



May 2019

Public Comments on the VISION 2050 Draft SEIS - Table of Contents

Business Community.....	6
Escala Condominium.....	6
Master Builders Association of King and Snohomish Counties	11
Master Builders Association of Pierce County	19
Seattle King County Realtors.....	23
City Government.....	30
City of Arlington	30
City of Auburn	31
City of Bellevue	34
City of Bonney Lake.....	36
City of Bothell.....	39
City of Bremerton.....	42
City of Covington.....	43
City of Des Moines	44
City of Edmonds	48
City of Everett	49
City of Everett (climate-specific comment)	55
City of Everett (verbal comment)	58
City of Issaquah.....	59
City of Kirkland	61
City of Lake Stevens	63
City of Lakewood.....	64
City of Lynnwood	82
City of Marysville.....	85
City of Mercer Island.....	86
City of Monroe	89
City of North Bend	91
City of Port Orchard	92
City of Redmond	94
City of Sammamish	99
City of Seattle.....	99

City of Shoreline	104
City of Snoqualmie	105
City of Steilacoom	106
City of Sumner.....	109
City of Tacoma	112
City of University Place	115
City of Woodinville.....	116
Joint letter: City of Shoreline, City of Woodinville, City of Kenmore, City of Lake Forest Park, City of Bothell	118
Seattle Public Schools	119
Seattle Public Utilities	122
County Government	124
Joint letter: King County, City of Burien, City of Kent, City of Kirkland, City of Redmond, City of Shoreline, City of Seattle, City of Tukwila	124
Kitsap County	127
Pierce County	132
Snohomish County	137
Tacoma-Pierce County Health Department.....	142
Tacoma-Pierce County Healthy Community Planning Interest Group	143
Federal Government.....	153
U.S. Environmental Protection Agency.....	153
Organizations	156
350 Seattle	156
Climate Solutions	158
Joint letter: Emerald Alliance, Transportation Choices Coalition, Mountains to Sound Greenway, Trust for Public Land, Conservation Northwest, SMWatts Consulting LLC.....	161
Joint letter: Seattle Public Schools, Puget Sound Sage, The Wilderness Society, Climate Solutions, Sierra Club Washington, Transportation Choices Coalition, Futurewise, Cascade Bicycle Club, Housing Development Consortium.....	163
League of Women Voters of Washington.....	172
Puget Sound Sage	174
Puget Sound School Coalition - King County Component.....	179
Sierra Club Washington	181
The Wilderness Society	193

Regional Government/Agency.....	194
Alderwood Water & Wastewater District.....	194
Community Transit.....	196
Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC	199
Pierce Transit	223
Pierce Transit (staff comment)	225
Port of Seattle, Port of Tacoma, Port of Bremerton, Port of Everett	229
Puget Sound Clean Air Agency	239
Snohomish County Tomorrow	240
Sound Transit	246
State Agency	248
Washington State Department of Archaeology and Historic Preservation	248
Washington State Department of Ecology	251
Washington State Department of Transportation.....	258
Individual comments.....	262
Alex Jones.....	262
Alex Tsimerman	263
Alexander Thomson	263
Alice Lockhart.....	264
Andrew Sang	264
Ann Stevens	265
Barbars Joyner	265
Blake Wedekind	266
Brad Book.....	266
Bryan Weinstein.....	266
Carolyn Hollack	267
Carreen Rubenkönig	267
Carter Burns	268
Cary Westerbeck.....	268
Chris Philips	268
Christine Coyle	269
Cliff Hanks	269

Connie Combs	270
Dan Wallace	271
Daniel Salinas	271
David Hancock.....	272
Derek Young.....	272
Elaine Nonneman.....	274
Grady Helseth	275
Gurvinder Singh	275
Heather Bruce	275
Heather Porter	276
Hendrick Haynes	276
Ian Scott	286
James Cooper	286
Janine Graves	286
Jeannette Sumpter.....	286
Jeffrey Moidel	287
Jennifer Lutz.....	287
Jerry Meyer	288
Jerry Waugh	289
John Feit.....	289
John Niles	290
Johnathon Davis.....	290
Jordan Goldwarg.....	291
Karen Herring.....	291
Kate Lunceford	292
Kathryn Keller.....	292
Kevin Tisdell	293
Laura Klepfer	293
Lauren Anderson.....	293
Lori Mcconnell.....	294
Margaret Ivie.....	294
Maribeth Crandell.....	295
Marilyn Martinetto	295

Marilyn Martinetto,Marty Martinetto	296
Mark and Laurene Temple	297
Mark Spitzer	298
Marlice Camus	298
Mary-Anne Grafton.....	299
Megan Kruse	299
Melody Wisdorf	301
Meloney Turner	302
Michael Koznek	302
Michael Mccoy	302
Mike Todd	303
Nancy Johnson	304
Natalie Bicknell.....	304
Nina Milligan	304
Pam Kepford	305
Peggy Shepard.....	305
Peggy Shepard.....	306
Peter Nigh	306
Rick Krochalis	307
Robbie Adams	309
Robert Dinse	310
Robert Larsen.....	310
Robert Palon	311
Sally Lider	311
Sally Montgomery.....	312
Sally Van Over	312
Scott Marshall	313
Sharon Kay Ricketts.....	313
Stephan Petryczka.....	314
Steven Morris.....	314
Theresa Barker	314
Tim Harris.....	315

Business Community

Escala Condominium

Communication ID: 354750

04/29/2019

Vision 2050 requires a new EIS

Submitted by Megan Kruse

On behalf of Escala

April 29, 2019

10 years of innovation has transformed commerce, transportation and the way people live. Vision 2050 needs a full environmental review that captures fundamental shifts and data that didn't exist in 2008.

Vision 2040, adopted in 2008, is the region's blueprint for creating strong communities with density, economic vitality and a healthy environment. But technological change and Puget Sound's rate of growth has far outpaced 2008 forecasts.

The region's white-hot economy and natural beauty has brought companies and investors from around the world. Vision 2050 will direct dozens of municipalities' efforts to absorb an additional 1.8 million people and 1.2 million jobs.

Communities of all sizes will employ Vision 2050 guidelines to allocate limited physical and financial resources, invest in infrastructure, and create legislation with wide-ranging environmental, economic and social impacts.

Vision 2050 must be based on data that's complete, accurate and relevant. A Supplemental EIS isn't up to this task. The original 2008 EIS couldn't foresee the disruptions, innovations and research that have redefined modern life and business.

Puget Sound companies and institutions have led some of these global life-style revolutions. After 10 years of explosive growth, ignoring fundamental changes and lessons we've learned will determine whether the region will emerge as a global leader or a massive casualty of unsustainable development.

A regional plan must include new commerce and transportation modes

Vision 2050 promotes mass transit as the key to adding density while maintaining a healthy environment and strong economy. Its three Supplemental EIS alternatives offer degrees of balance between density patterns and transit and other transportation modes. They estimate the impact each alternative will have on pollution, congestion, the built environment and community quality of life.

But neither its original EIS nor proposed Supplement include transportation mode data for two phenomena of the past decade that have disrupted transportation planning: e-commerce

deliveries and ride hailing services like Uber and Lyft, known collectively as Transportation Network Companies (TNCs).

Use of both modes increases with density. Neither existed or was a factor in

2008 but today their impacts are dominating strained public right-of-ways and limited transportation infrastructure.

Their effects on urban freight volumes and traffic mobility have been reported by municipalities across the country. The University of Washington and Seattle's Department of Transportation (SDOT) have led nationally recognized research on e-commerce. Yet delivery trucks and rideshare vehicles are not listed among Vision 2050's SEIS travel modes or calculations.

Urban density is creating more traffic even if people don't own cars

The draft SEIS and new Seattle transportation Level of Service (LOS) legislation identify Single Occupancy Vehicles (SOVs) as the biggest source of urban congestion and pollution. That may be true in some areas but in downtown Seattle, the epicenter of density, SOV use is 25% and falling.

Instead of tracking multi-modal traffic PSRC and Seattle policy makers seek to control congestion and carbon emissions as well as finance new infrastructure by introducing SOV congestion pricing and implementing transportation impact fees.

These policies may also deter economic vitality and impact social equity. More importantly they don't address the rising and uncounted percentage of traffic and daily vehicle miles generated by TNCs and e-commerce delivery trucks serving residents and workers in the urban core.

As region's largest metropolitan center, downtown Seattle has provided an early test ground for residential and commercial density. TNCs and e-commerce deliveries are widespread here and surging.

These modes have gone mainstream but are only mentioned in passing in Vision 2050's SEIS and the 2018 Regional Transportation Plan. They must be factored into future density plans. Here's what local and national research tell us about their impact on travel behavior, land use and loading.

TNCs: an established mode that doesn't replace SOVs but draws users from transit.

Local and national TNC research shows ride hailing service in city cores is growing unchecked. Affluent urbanites are the prime market. This is borne out by the latest available TNC statistics obtained from Uber/Lyft for the zip code of

98101; home to over a dozen downtown mixed use mega tower developments.

In the half square mile of zip code 98101:

TNC rides rose 30% in 2017 to 4,893,444.

The first two quarters of 2018 registered 3,009,062 total rides up 27% from the first two quarters of 2017.

The 2nd quarter of 2018 averaged over 17,500 daily rides in this compact area. (Exhibit 1).

These local findings are in line with a 2018 study recognized by SDOT. It reports TNC impacts on the country's top nine rideshare markets including Seattle.

<http://www.schallerconsult.com/rideservices/automobility.pdf>

The Schaller report finds:

"Instead of 'replacing the personal auto' TNCs in large cities are primarily supplanting more space-efficient modes such as bus, subway, biking and walking. (p. 15).

Most Uber and Lyft rides are still private rides (each traveling party riding by themselves) and the addition of pooled options fails to offset TNC traffic-clogging effects. (p. 3)

TNCs add 2.8 driving miles to streets compared to 1 mile for every SOV for an overall 180% increase in driving on city streets (p. 3)

38% of TNC trips are in the city center City. Ridership in the city core averages 45 TNC trips per person in 2017. (p. 8)

TNCs are not making a dent in vehicle ownership. Seattle household ownership of vehicles has continued to rise with its population. (p. 21, Table 10). This is confirmed by many residential towers' plans to provide private parking stalls for 60-80% of their residential units despite being surrounded by multi-modal options.

Density + E-commerce + Rising Freight Tonnage = Surging Truck Trips

It may have started with Cyber Monday in 2005 but now every day is cyber day. E-commerce grew from 3.5% of retail sales in 2008 to 9.8% in the latest Census Bureau statistics. It is mainstream retail and growing 15% annually.

The Regional Transportation Plan-2018 in Figure 12 p. 58 shows lock step correlation between increasing population, employment and truck tonnage. WSDOT reports 80% of all metro area truck trips are generated by deliveries of goods and services to regional and local delivery areas.

In today's e-economy residents receive deliveries of food, furniture, hard and soft goods, clothing, recreational items and household supplies every day—and with on-demand and free 1-day delivery service, sometimes many times daily.

The UW and SDOT predict that with NO population growth, e-commerce deliveries will double in Seattle's urban core.

We know a lot about e-commerce deliveries but we're not counting the fleets of trucks it takes to deliver these goods or considering the ever-shrinking space they have to unload and the time it takes to do it.

If Vision 2050 is going to lead the way to sustainable density it needs to address transportation impacts of e-commerce. These issues have been studied nationally with some of the most respected research being done locally by the UW and SDOT.

Issue #1: Residential towers aren't being required to provide loading berths.

A 2017 Hofstra University study shows this is wrong. It sought to quantify average deliveries generated by the number of units in apartment buildings. Analyzing deliveries at an apartment complex with upper middle class demographics, it determined each unit would generate an average 1.5 package deliveries per week. It speculated higher-end properties would generate more. https://www.metrans.org/sites/default/files/MF%205.1a_Residential%20Parcel%20Deliveries_Final%20Report_030717.pdf

0Deliveries_Final%20Report_030717.pdf

The study found that deliveries are concentrated Monday through Friday and that from January 2015 through 2017 parcel deliveries grew 17% annually correlating with the 15% annual growth estimates for U.S. online retail sales.

Applying the Hofstra ratio of 1.5 weekly packages per unit, a typical Seattle residential tower of 900 people would average a minimum 784 weekly packages delivered mostly Monday-Friday. However, data from four Seattle luxury condos in the downtown core suggests the 1.5 package ratio is low and respondents note the variety of service providers that deliver by truck.

More recent insight on the situation comes from a December 2018 Time

magazine article. It explored the adverse impacts of e-commerce on urban transportation grids across the country, including Seattle's.

<http://time.com/5481981/online-shopping-amazon-free-shipping-traffic-jams/>

Among its findings:

"Apartment and office towers are particular chokepoints because they receive large numbers of daily deliveries from Amazon and other retailers. Yet they typically have no loading docks or reserved parking for the UPS, Federal Express and U.S. Postal Service delivery trucks streaming to their curb-fronts."

"University of Washington (UW) researchers in Seattle, the birthplace of both Amazon and United Parcel Service (UPS), have found that about half of the trucks making deliveries downtown are forced to park in unauthorized spots — blocking alleys, double parking on already congested streets or parking in bike lanes and other no-parking zones."

Trucks make up 7% of total traffic but they account for 28% of the nation's congestion. (Texas A&M University's Transportation Institute.)

Issue #2: Shrinking curb space won't contain e-commerce deliveries

Seattle-specific research speaks to the impacts of e-commerce and lack of curb space and dedicated internal loading infrastructure.

The situation is described in a groundbreaking SDOT-sponsored report called The Final Fifty Feet'. That report concludes 87% of delivery trucks rely on street parking. As previously stated, it concludes even with zero population growth, e-commerce deliveries will double in the Seattle core by 2023. https://depts.washington.edu/sctlctr/sites/default/files/SCTL_Final_50_full_report.pdf

Issue #3: Cities need private sector infrastructure to sustain urban density

In late 2018 the UW and SDOT released a second pioneering study documenting all Seattle's City Center alleys' infrastructure and occupancy. (Exhibit 2, Alley Infrastructure Inventory and Occupancy Study)

The report included the following recommendations: (p. 7)

Encourage the use of and/or development of new building and load/unload equipment designs to get vehicles out of the alley and into adjacent loading bays quickly.

Revise alley design standards for future development so that Center City area alleys provide loading bays with entrances that angle in the correct direction for alley flow

Provide sufficient space for trucks to fully extend equipment

Provide space for trash/recycle containers to be stored out of travel lanes

Seattle has done the important research showing how density and rising e-commerce will impact its City Center. Both UW/SDOT studies are being hailed and copied around the country and yet their lessons have yet to be incorporated into new Seattle tower designs.

PSRC needs to lead the way by incorporating the conclusions and recommendations of both UW/SDOT studies into Vision 2050's EIS.

What do we have to lose?

Puget Sound's transportation grid is the underpinning of healthy, safe and vibrant communities. It allows for the free flow of people and goods and the ability of fire, medical and police to reach tens of thousands urban residents and office

workers. Even when mass transit is prevalent, our roads will continue to serve as main arteries carrying goods and services to people's doors.

We must address the impacts of TNC's and e-commerce delivery trucks now or they will permanently limit the region's ability to sustain density and a healthy environment and economy. The consequences include:

Loss of critical infrastructure. Towers will be built without adequate loading and waste/recycling facilities causing service trucks to circle city streets and block right of ways leading congestion.

The region won't meet its goals for carbon emissions because it failed to account for increased delivery trucks and TNCs that essentially act as SOVs.

Buildings and municipalities won't be prepared to deal with the mountain of recycling that is the by-product of e-commerce.

Legislators and traffic planners won't effectively prioritize resources and legislation to deal with the biggest threats to mobility. In the urban core that threat may not be SOVs.

Even if SOV use hits its target, urban core transit and HOV commuters will still be delayed because all sources of traffic are not being counted. This could lead public transit users' defection to less sustainable modes.

VISION 2050 needs a new EIS. The world has changed and stakes are high.

The Puget Sound Regional Council's environmental review process is intended to analyze the effects of continued growth and ways the region can respond to and accommodate that growth. The VISION 2040 FEIS from 2008 did not

foresee today's world and falls short as a foundation for the environmental review that will take Puget Sound through the middle of the 21st Century.

We ask you to consider the facts and make VISION 2050 a planning tool that uses current data to make Puget Sound a leader and not a casualty of the new global economy.

Commenter(s):

Escala Condominium, Megan Kruse

Master Builders Association of King and Snohomish Counties

Communication ID: 354854

04/29/2019

Dear Paul,

Thank you for the opportunity to comment on the Vision 2050 DSEIS. Attached please find MBAKS' comment letter, as well as the scoping comment letter MBAKS submitted last year.

Let us know if you have questions or would like additional information.

Best regards,

Patricia

###

April 29, 2019

Paul Inghram
Director of Growth Management
Puget Sound Regional Council
1011 Western Ave. Suite 500
Seattle, WA 98104

RE: Vision 2050 DSEIS Comments

Dear Mr. Inghram:

On behalf of the nearly 2,800 member companies of the Master Builders Association of King and Snohomish Counties (MBAKS), we appreciate the opportunity to provide the PSRC with comments concerning the Vision 2050 Draft Supplemental Environmental Impact Statement (DSEIS). We ask that these comments be considered and entered into the Vision 2050 project record.

MBAKS members are the end users of city and county development regulations that are derived from Multi-County Planning Policies, Countywide Planning Policies, and Comprehensive Plans. MBAKS members have a keen interest in the Vision 2050 update and are focused on working closely with PSRC staff as the project moves forward.

We appreciate the work of PSRC staff to prepare the DSEIS. The following comments relate to the selection of a Preferred Alternative. We have also provided a table of more detailed comments for consideration as the DSEIS evaluation continues.

**** Scoping comments****

As part of the SEPA scoping comment period for the DSEIS, MBAKS provided comments last year. While we understand that some of our comments may be addressed when updated Multi-County Planning Policies are completed, most of the comments we provided were not addressed as part of the DSEIS. Please address our scoping comments as part of the response to comments and the FSEIS. A copy of the scoping letter dated March 16, 2018 is attached for reference. Please include this March letter into the record as part of the DSEIS comment period.

Preferred Alternative

As PSRC evaluates the three SEPA alternatives (Stay the Course, Transit Focused Growth, and Reset Urban Growth), we hope that additional information, outlined below, can be incorporated in the SEPA process. This will ensure the selected alternative reflects where the region plans for job growth in the future and where growth is likely to occur, i.e. actually occurring. In reviewing the DSEIS, it appears that PSRC prefers the Transit Focused Growth Alternative. While this alternative has much to recommend, and MBAKS could potentially support some form of it, there are three areas where more information is needed before an alternative is selected.

Incorporate actual growth patterns in at least one DSEIS alternative

We request that at least one of the alternatives incorporate actual population growth since Vision 2040 was adopted. Currently, the Stay the Course alternative is based on Vision 2040 and both the Transit Focused and Reset Urban Growth alternatives appear to utilize the Stay the Course alternative as their baseline. However, regional by the DSEIS, the accuracy of the document will be undermined. The gap between planned and actual growth is compounding each year, and the preferred alternative must account for actual growth patterns.

For example, in order to be consistent with Vision 2040, the 2015 Snohomish County Comprehensive Plan adopted the Vision 2040 allocated percentage of growth for its Unincorporated UGA. As of 2018, the population has nearly exceeded the 2035 growth target and will surpass it this year. In 2015, the City of Everett adopted a growth target consistent with Vision 2040 even though the city acknowledged it was unlikely to meet the target by 2035. Since 2011, the City of Everett has only accepted 9.2% of the population growth in the county, far below the 26% allocated under Vision 2040.

2. What does the Transit Focused Growth Alternative mean for the jobs-housing balance in the future?

The Transit Focused Growth Alternative would focus almost all growth within areas where high-capacity transit currently exists or is planned for. Since high-capacity transit (HCT) is not planned for unless areas meet growth and density requirements, this alternative would essentially prevent any future extension

of high-capacity transit outside areas where it already exists or is planned. While not explicitly stated within the DSEIS, it is the logical conclusion. Is it the intent of this alternative to limit HCT to existing or planned HCT?

We are all concerned about the environmental impacts of the jobs/housing balance. People are moving farther from where they work to find housing they can afford. Bringing HCT to some of the jurisdictions labeled “cities and towns” may be appropriate in the future. Vision 2050 is the appropriate document to anticipate scenarios where it would be acceptable for “cities and towns” to exceed allocated percentages of growth under Vision in order to spur planning for HCT.

3. The DSEIS should clearly explain and define what “Consistency with Vision” means

We would like to request that the DSEIS more clearly define what is meant by “consistency with Vision”. Some questions to consider:

- Are growth shares allocated by regional geography minimum goals (a ‘floor’) or maximum limits (a ‘ceiling’)?
- When is it appropriate for a jurisdiction to vary from the Regional Growth Strategy (RGS) while maintaining consistency?
- Are local governments required to adopt the Vision population growth percentage even when it is inconsistent with probable growth?
- What are the environmental impacts of a local government adopting a growth target that it knows is not aligned to actual growth patterns?
- How does that impact public facilities such as schools, planning for public utilities and infrastructure that rely on accurate comprehensive plans?
- Under the Transit Focused Growth option, for example, could the growth for the “cities and towns” regional geographies exceed their overall percentage share of growth if doing so meant getting high-capacity transit in one of their cities?
- How much flexibility do local governments have in considering and adapting to growth issues in their own jurisdictions?

The less flexibility local governments have to adjust the more important it is that the preferred alternative accurately captures the growth that will actually occur between now and 2050.

**** Summary****

We appreciate the time and work that went into preparing the DSEIS for comment. Please consider us resources on home building issues, and feel free to contact us with any questions. We look forward to working with PSRC staff and leadership as the FSEIS is prepared.

Sincerely,

Master Builders Association of King and Snohomish Counties

Kat Sims

Executive Director

****Summarized Comments on Vision 2050 DSEIS ****

Unincorporated UGAs

The Stay the Course alternative is based on Vision 2040, not actual growth. One of the alternatives should incorporate existing growth patterns which, in some cases, differ significantly from Vision 2040.

Characterization of growth near UGA boundaries

It appears that PSRC prefers the Transit Focused Growth alternative over the Reset Urban Option. There are several areas in the DSEIS that indicate the Reset Urban Option would have a greater environmental impact than other alternatives. However, nothing in the DSEIS substantiates these statements. In fact, under GMA, land within urban growth boundaries can be developed. Existing policies and well-established land-use law protects environmentally critical areas. To imply that development in the unincorporated UGA will necessarily have a detrimental impact on the environment is to discount the many rules and regulations currently in place designed to protect the environment.

Jobs/Housing balance: no discussion about commuting into the region

When the supply of housing falls short of demand near employment centers, people must move farther from their jobs to find housing that they can afford. We encourage you to include in the DSEIS an estimate of the number of people commuting from outside the region, anticipated future numbers, and the environmental impacts of people commuting into the four-county region for work. Currently, none of the three alternatives discuss this issue, nor identify environmental impacts, or recommend mitigation to address these impacts.

Information in the DSEIS must be more detailed to allow for more informed decisions

We understand why much of the information in the DSEIS is presented at the regional level. However, without details on current conditions or data and statistics broken down at county and/or regional geography level, it is difficult to identify a preferred alternative. This is especially true of jobs and housing.

- Providing regional/mean data disguises potentially major disparities between areas; King County is a relative outlier and likely skews the regional average. To select a preferred alternative, we need to understand what is happening at a more localized level. This would enable a gap analysis to clearly understand the current situation and what needs to happen to make Vision 2050 a reality.
- Please provide information on impacts and mitigations that are specific to each county so local jurisdictions have the most accurate data for their comprehensive planning purposes.

Jobs-housing balance analysis in sub-regions

- Two alternatives shift 5% of the jobs outside of King County, but there is no mitigation or identified actions that would support that. In fact, it's possible such a shift could have negative impacts on the environment. The DSEIS should provide more information about how we will improve the jobs/housing balance and what the possible impacts might be.

- Please show how the jobs-housing balance ratio has changed from Vision 2040 to today and what Vision 2050 seeks to achieve (including actions and mitigation) to improve the current ratio.

Consistency with Vision

Please clearly define and explain what it means for cities and counties to be consistent with the Regional Growth Strategy.

On page 75, it states that “The Regional Growth Strategy provides regional guidance for the countywide growth target process.” If the RGS is only “guidance” then local governments would not be required to adopt a growth target consistent with Vision to have their comprehensive plans certified by PSRC. Can counties and/or regional geographies deviate from their targets if they explain why?

Mitigation measures The mitigation measures identified in the Chapter 4 tables as currently written are the same for all three alternatives in each area of the four-county region. We ask that specific mitigation measures be provided for each alternative and for each region. If all mitigation measures are the same for each alternative, then it would make sense to expand bookends of what is being reviewed under SEPA. For example, two of the alternatives shift 5% of the jobs outside of the King County region. This is a logical place to discuss how this shift might happen and what mitigation measures might be applied. However, as written, these tables do not provide any explanation.

****Unincorporated urban areas and public services/utilities ****

Please recognize how growth in urban unincorporated areas supports future annexation/incorporation. Public services sections consistently mention how cities/towns are providers of public services, but this is not always the case. Many cities and towns contract with county providers, and the overall region seems to be moving in the direction of region-wide public service and utility providers.

###

March 16, 2018

Erika Harris

Senior Planner Puget Sound Regional Council

1011 Western Ave, Suite 500

Seattle, WA. 98104

RE: Vision 2050 – SEPA Scoping and project comments

Dear Ms. Harris;

On behalf of the 2,900-member companies of the Master Builders Association of King and Snohomish Counties (“MBAKS”), we appreciate the opportunity to provide the PSRC SEPA scoping comments for the Vision 2050 project update EIS. We ask that these comments be considered and entered into the record as part of the project scope and approach for the Vision 2050 update.

As end users of Multi-County Planning Policies (MPPs), Countywide Planning Policies, local Comprehensive Plans and development regulations, MBAKS members have a unique perspective on the

effectiveness of planning for growth in King and Snohomish counties. We look forward to working closely with PSRC staff in updating Vision 2040; we have direct experience that could help to better align policy goals with on-the-ground results.

**** 1. Cities Need to be Accountable for Accommodating Growth Targets**** We see many jurisdictions pushing back on the rapid growth in the region through building moratoriums, restrictive tree retention regulations, wider buffers, higher impact fees, etc. Citizens want to “retain the character of their town” which leads to policies that restrict growth. This is contrary to PSRCs Vision that growth be focused in existing cities and towns, near job centers and transit, to lessen our impact on the environment (greenhouse gas emissions, sprawl, preserving natural areas, etc.). We support the PSRC process of allocating growth to cities, towns, and unincorporated UGAs to accommodate the growing population, however, how do we ensure these local jurisdictions will accommodate and accept the growth they plan for? How can PSRC help the region understand the growth and change that will be occurring in our region and that we must encourage growth within urban areas to ensure effective use (and conservation) of our resources? If growth does not occur as planned for within adopted policies, additional land will be needed to accommodate our region’s growing population. We ask that PSRC analyze this disconnect between growth targets and local development regulations under SEPA as part of the Vision update.

**** 2. A Fresh Look at UGAs**** One of the possible consequences of cities and towns not accepting growth targets and/or increasing density is that it pushes growth out, further from job and transportation centers. The fastest growing areas are cities and towns north, south, and east of the big cities like Seattle, Bellevue, Tacoma, and Everett. People are moving where they can afford (and find) a home they can buy, even if it’s far from where they work. This in part creates more pressure on our transportation system. If more condos were built closer to job centers, that could help; it would provide a viable home ownership opportunity for first time buyers, downsizers, and those who like the lifestyle. This could be part of a larger set of tools to ensure more housing for more people in the Vision 2050 planning time frame.

Another option that we believe needs to be analyzed is developing policies that allow limited UGA expansions adjacent to established urban centers, while continuing the PSRC’s request to “bend the trend” to encourage urban growth in established cities. SEPA analysis and an economic study based on realistic population growth estimates would be important to determine whether current policies will result in growth being contained or pushed beyond the four-county region (e.g. people commuting to work in the PSRC planning region from Kittitas, Skagit, Whatcom, and Thurston Counties).

**** We ask that PSRC’s Vision 2040 Update SEPA review include review of areas inside the UGA, especially along the perimeter of a UGA, that for over 20 years have not built to urban densities**. It is important to analyze these areas, as they are considered to have room for growth, yet are underperforming relative to other areas of the region. In some instances, it appears that the existence of a capital facility plan could be signaling future growth, but the growth is not occurring. It is possible that there are areas where UGA boundaries have created an unintended urban/rural divide, making it more difficult to accommodate/encourage growth in these areas. What policies can PSRC establish that would address these real-world issues that impact our ability to grow in alignment with the Regional Growth Strategy?**

**** 3. Revise Growth allocation process**** We believe Vision 2040 growth targets did not adequately recognize where the population is growing and as a result, some cities (e.g. Everett) were allocated growth targets that they knew they wouldn't meet. In other cases, cities were allocated growth targets that they knew they would exceed (e.g. Covington). Unfortunately, if the growth targets are not accurately reflecting reality, it can have real consequences, such as capital facility plans that either over or under plan for vital public facilities like sewer, water, transportation and schools.

An example: Snohomish County and cities within the county adopted growth plans in 2015, knowing that the Regional Growth Strategy (RGS) targets were aspirational. However, in alignment with PSRC guidance, Everett (who notified PSRC that they would not meet their growth target) adopted a comprehensive plan, which included the overly optimistic growth numbers. PSRC reviewed and certified the plan. Why would PSRC "certify" plans that aren't realistic or accurate? As of 2018, Everett has only received 9% of the total county growth when it should be closer to 25%. The gap has widened; Everett now needs to capture 33% of the county growth each year from now until 2035 to hit its target. Every year it falls short, the gap widens (see attached slide presentation from Snohomish County Tomorrow).

We suggest two options for growth target setting be considered under SEPA and as part of the Vision 2040 update:

Remove the Regional Growth Strategy allocation process and policies in Vision 2040 and utilize the process in the Growth Management Act (GMA), currently used by every GMA county and city outside of the PSRC planning region. The GMA provides guidance regarding focused growth in UGAs and protection of rural and resources lands. PSRC could support GMA guidance by creating incentives e.g. transportation funding, for jurisdictions that are designated Centers. Incentives would encourage urban growth and focus transportation dollars to the appropriate areas. Jurisdictions would need to accommodate their growth targets to be eligible for transportation dollars. This would focus jurisdictions on setting realistic targets that recognize existing conditions and plan for and implement regulations that "encourage" urban growth as the GMA prescribes. It also helps ensure that capital facility plans are accurate and reflect how our region will grow.

If PSRC opts to retain Regional Growth Strategy, it should reconcile it with the less prescriptive growth target process in the GMA. Further, the RGS should be revised to include policies that hold jurisdictions accountable for accepting growth targets and adopting policies that will enable new growth. Failure to accept additional growth should have consequences, i.e. transportation funding priority to those who grow and continue to enable growth through local land use policies and development regulations.

****4. Environmental Impacts of adopting inaccurate targets** We ask that PSRC study the land use, transportation, capital facility and environmental impacts of the regional geographies growth allocation process within the Regional Growth Strategy.******An accurate analysis of the impacts will help ensure that the growth allocation process accurately reflects reality and is not merely a set of aspirational goals.

Growth targets adopted by individual jurisdictions may be slightly higher or lower when implemented over 20 years. However, the current growth allocation process can (and has) allowed jurisdictions to adopt unrealistic targets that do not reflect actual growth patterns. There are many issues that drive growth patterns, which should be recognized in the growth allocation process. Setting a growth target within a comprehensive plan does not necessarily translate to that target being met. We are concerned

the current process does not adequately address the many reasons why jurisdictions adopt inaccurate growth targets and we believe this must be addressed in the Vision 2040 Update SEPA process.

**** 5. PSRC Role**

We ask that an analysis be completed under SEPA and as part of Vision 2050, which describes how PSRC's Vision update aligns with (and is not redundant) GMA requirements, to ensure Vision 2050 implements and does not expand PSRC authority, according to the interlocal agreement and by-laws.** Of note is PSRC's comprehensive plan certification process, which occurs after GMA appeal periods have lapsed, which could result in significant issues for local governments.

We have concerns that the structure of PSRC makes it challenging for local governments, interested groups, and citizens to meaningfully participate and have an impact, if they are not on one of the more visible boards or committees at PSRC. We appreciate that PSRC has undertaken significant public outreach as part of the Vision 2040 Update. However, there are approximately 23 boards and committees at PSRC (according to the PSRC website) and the types and range of projects PSRC engages in, continues to grow. While we appreciate PSRC's work in many areas, this may be the appropriate time to assess PSRC's role in the region.

**** 6. Regional differences**

We respectfully request that regional differences be reviewed under SEPA and as part of the Vision update, and policies be enacted that reflect these differences.** Vision 2050 policies must recognize the considerable differences between King, Snohomish, Pierce and Kitsap counties and their cities. This includes differences in the housing markets and types of housing needed, the local economy and jobs, and economic forces that drive growth. While it is important for the Regional Growth Strategy to align growth policies within our region, Kitsap, King, Pierce and Snohomish counties may choose to implement policies in a way that is unique to their individual circumstances. What can PSRC do to recognize and acknowledge this in a way that maintains overall alignment with Vision 2050 goals?

**** 7. The overarching goal of Vision2050**

We ask that you review the Multicounty Planning Policies (MPPs) under SEPA, through the lens of local governments' ability to implement the MPP policies.** This goes beyond local government's ability to implement the MPPs within policies in their Countywide Planning Policies or Comprehensive Plans. We are asking that you review how many of the policies within Vision are expected to be implemented within local government regulations. While PSRC jurisdictions are constantly updating policy documents, they often lack the time and resources to implement policies beyond those required by the GMA. In many jurisdictions, this has resulted in development regulations that are outdated, inefficient, and not aligned with the Regional Growth Strategy. Thus, the need for a Vision document that is concise and focused, keeping the end user in mind. If a policy doesn't have an implementable action and is already required through other planning requirements, it should be eliminated.

A thorough review will help PSRC understand what is working, what changes need to be made, how to address conflicting policies, and remove redundant policies and requirements. In addition, we would like to see a clear, consistent definition of the many terms that are used in PSRC planning documents. Words such as: recognize, identify, protect and enhance, ensure, support, promote, address, tailor, encourage,

achieve and sustain, expand, leverage, foster, improve, reduce, and protect could have many different meanings. What can PSRC do to create clarity and alignment in a brief and easily understood Vision?

** Finally, we believe the SEPA process should not incorporate the new Centers Framework as a policy basis for the Vision update.** The Vision update should analyze all options presented and then reframe how growth will be allocated. Centers will then need to align with the updated policies in Vision.

As mentioned in our comment letter on the Centers Framework, we believe these projects are out of order; policies related to how growth should be allocated should have come before defining the Centers where the growth is directed to go. As such, the Centers Framework likely will need to be revised once Vision is updated.

Please consider the MBAKS as partners and resources for the PSRC on anything concerning home building, housing and other related issues. We look forward to working with you. We appreciate the opportunity to comment on the scope of the EIS for the Vision 2050 update and we will continue to engage as the project moves forward.

Sincerely,

Erich Armbruster President

Board of Directors

Master Builders Association of King and Snohomish Counties

cc: Josh Brown, Executive Director, Puget Sound Regional Council

[included -- 5 pages of graphs and tables]

[Commenter\(s\):](#)

Master Builders Association of King and Snohomish Counties, Kat Sims

[Master Builders Association of Pierce County](#)

[Communication ID: 354762](#)

[04/29/2019](#)

April 29, 2019

Mr. Josh Brown

Executive Director

Puget Sound Regional Council

1011 Western Avenue, Suite 500

Seattle, WA 98104-1035

Dear Mr. Brown,

This letter is in reference to the Vision 2050 Draft Supplemental Environmental Impact Statement (SEIS) regarding the Puget Sound Region Council's (PSRC) plan for growth. On behalf of the Master Builders Association of Pierce County (MBA Pierce) and our 650 association members, thank you for your consideration to these comments.

Introduction

Because our Association is located within Pierce County and our members primarily conduct business here, our comments are rooted in the realities regarding growth that Pierce County, as a whole, is experiencing currently and will be experiencing in the future. MBA Pierce would also like to acknowledge that our members build the homes which the real estate market is currently demanding- that are being desired by homebuyers- which is largely single family homes. In context, we assert that it is important for the PSRC to recognize the products which consumers are pursuing. Therefore, due to geographical and market-based realities MBA Pierce faces, we advocate strongly for the Reset Urban Growth alternative among the three available options.

Acknowledgement of Unincorporated Urban Growth Area Potential

In Pierce County, there is bountiful Unincorporated Urban Growth Area (UUGA) that is not claimed by any jurisdiction. The decision to Reset Urban Growth is the only option PSRC provides which recognizes the potential to secure adequate housing and economic growth to the UUGA. It is imperative for PSRC to thoroughly understand the plans Pierce County has and projects already in the pipeline for its UUGA.

Centers and Corridors Project

Surely the letter Pierce County submits will describe the anticipated Centers and Corridors project in greater detail, but MBA Pierce has been involved with this endeavor since 2016 and we would like to emphasize its significance. This project Pierce County is pursuing seeks to establish high-density communities with employment and

transportation options available for residents living within the areas of Frederickson, Mid-County, Parkland-Spanaway-Midland, and South Hill.

All of these areas mentioned are currently UUGA, but the intention to radically rezone these regions will allow for these areas to eventually incorporate as their own jurisdictions. An article in the Tacoma News Tribune summarizes the intent to guide these community plans to spur development; to bolster these UUGA locations to the point where it becomes economically feasible to incorporate. Pierce County planner, Jessica Gwilt, aptly describes the intent of the project in the article: "Part of (the plan) is establishing the ability for [these areas to incorporate] if they so choose... They get to determine their fate."¹

The Centers and Corridors project is undoubtedly ambitious but has the potential to create several new incorporated areas within the Urban Growth boundaries in due time. The incorporation process would not be immediate and growth would need to occur in

the UUGA until these communities are ready to transition. Understandably, this project is unique but it is important to note that the Stay the Course and Transit Focused Growth alternatives that the PSRC has put forth are limited in their assumptions of how much growth should occur in UUGA. Those

options do not have the capacity to account for the innovation of potential endeavors like the one Pierce County is pursuing.

2. Pierce County UUGA Pipeline of Projects

Apart from the Centers and Corridors Project, there are several other planned communities in the pipeline in Pierce County's UUGA. Among the anticipated projects are the Tehaleh, Lipoma Firs, and Sunrise developments. All three of these developments are being built by our association's builder members and all three are anticipated to produce nearly 11,000 housing units combined. Smaller development projects, ranging from 100 to 850 units total over 3,000 units collectively. Finally, Pierce County calculates that there are over 3,300 units projected from plats with less than 100 lots. The total amount of anticipated projects in Pierce County's queue amounts to 17,353 housing units.²

Understanding the volume of projects in UUGA that the County is anticipating has encouraged MBA Pierce to support the Reset Urban Growth option. Stay the Course and Transit Focus Growth alternatives would only allow the distribution of 13,200 and 16,400 housing units, respectively, in the UUGA. The Reset Urban Growth option, however, would allocate 43,200 housing units. Not only would this option be able to sufficiently accommodate all of the expected projects in the pipeline, but would also leave room for subsequent units in the areas within the Centers and Corridors project Pierce County is looking to stimulate.³

Regional Growth Strategy vs. 2000-2017 Actual Development

1 Allison Needles, "New cities in Pierce County? Community Plans lay the groundwork for incorporation," Tacoma News Tribune, April 9, 2019, <https://www.thenewstribune.com/news/local/article228812044.html>.

2 Gwilt, Jessica. "Initial Staff Observations of Vision 2050 Draft SEIS." Presentation, Tacoma, WA, April 4, 2019.

3 Ibid.

Before a 2050 strategy is drafted, MBA Pierce urges PSRC to acknowledge where Vision 2040 growth targets did not adequately recognize where the population is growing. Some cities were allocated growth targets that they knew they wouldn't meet and, in other instances, cities were allocated targets they knew would be surpassed. We assert that if the growth targets are not accurately reflecting reality, it can have real consequences. For example, capital facility plans for vital public facilities like sewer, water, transportation and schools cannot afford to be radically off in their estimates. Below is a graph provided by Pierce County Planning Staff comparing anticipated growth with the Vision 2040 allocations to the actual growth allocations that occurred from 2000 to 2017.

Graph 4

Pierce County Staff also provided graphs on what unit production would look like in the implementation of the three different options according to allocation percentages.

1. Stay the Course Alternative

Graph 5

4 Ibid.

5 Ibid.

With the Stay the Course option, Tacoma noticeably needs to increase units produced. They were one of the cities in Pierce County that was given a growth target they could not meet. UUGA also needs to severely and unrealistically bend the trend currently happening. Given the data, this alternative is an unrealistic in Pierce County.

2. Transit Focused Growth Alternative

Graph 6

Under the Transit Focused Growth option, UUGA has a more drastic need to bend the trend so that growth distributions are met. Tacoma has a lower goal to achieve than in the first alternative because high capacity transit communities acquire more anticipated growth. Due to the severe changes that still need to occur under this alternative, we deem it as equally unrealistic as the Stay the Course alternative.

3. Reset Urban Growth Alternative

Graph 7

Under the Reset the Urban Growth option, UUGA still has to bend the trend somewhat and Tacoma is still tasked with finding ways to considerably increase production of housing units. The adjustments in reassessed allocations are not as radical as in the first two options and,

6 Ibid.

7 Ibid.

though the allocation percentages provided by the PSRC in this option are still not reflective of the reality in regards to where homes are being built and desired in Pierce County, MBA Pierce asserts that the Reset Urban Growth option is the best of the three available alternatives.

Conclusion

From a standpoint of a nonprofit organization that represents homebuilders who build attainable housing in the Puget Sound Region, MBA Pierce affirms that the Reset Urban Growth alternative needs to be strongly considered. Though this option of the three might be the most difficult to pursue, we know it is the only alternative available that will realistically account for anticipated projects in Pierce County's pipeline as well as the eventual development that will occur in the areas of Frederickson, Mid-County, Parkland-Spanaway-Midland, and South Hill

through the Centers and Corridors project. The intention of this letter was to illustrate in detail of the reality of the growth that will occur in the UUGA because of these upcoming projects.

MBA Pierce hopes that you recognize the significant differences between the needs of King, Snohomish, Pierce, and Kitsap counties and their cities. This includes differences in the housing markets and types of housing needed; anticipated growth allocations; the local economy and jobs; and economic forces that drive growth. Furthermore, we ask that you consider MBA Pierce as a

resource for the PSRC on anything concerning home building, attainable housing, and other related issues. We look forward to working with you and thank you for the opportunity to comment on the scope of the Vision 2050 Draft SEIS. We will continue to participate as the project moves forward.

Sincerely,

Jessie Gamble

Government Affairs Manager

[Commenter\(s\):](#)

Master Builders Association of Pierce County, Jessie Gamble

[Seattle King County Realtors](#)

[Communication ID: 354841](#)

[04/29/2019](#)

From: David Crowell

Sent: Monday, April 29, 2019 10:21:17 PM (UTC+00:00) Monrovia, Reykjavik

To: VISION2050SEIS

Subject: VISION 2050 SEIS Comment

April 29, 2019

PSRC

Email: VISION2050SEIS@psrc.org

1011 Western Ave., Suite 500

Seattle, WA 98104

RE: VISION 2050 SEIS Comment

Dear PSRC:

We are resubmitting our previous comments (attached) to renew our concerns regarding the VISION 2050 Growth Strategies.

In addition, we wish to also highlight two concerns:

What is the plan to effectuate redistribution of 5 percent of the jobs? A vision without a plan for implementation isn't worth the paper it's written on and this has been, and continues to be, very expensive fancifulness.

The first option to "stay the course" is based on 2012 data, not the more recent 2017 data from OFM. We fail to see how this complies with the Growth Management Act.

Thank you for allowing us the opportunity to comment.

Sincerely,

David Crowell, JD

Director of Governmental & Public Affairs

###

TO: Puget Sound Regional Council

FROM: Seattle King County REALTORS®

12410 SE 32nd St., #100, Bellevue, WA 98005

DATE: April 29, 2019

RE: Scoping Comments on PSRC Vision 2050:

“We are in Desperate Need of Housing Supply That Will Balance the Recent Job Growth our Region Has Experienced”

Dear PSRC:

We are writing to offer these comments of record on behalf of our 7,000+ REALTORS® here in King County regarding the “Scoping” for “Vision 2050.” Seattle King County REALTORS® is the largest local REALTOR® Association in Washington.

We submit these comments because our Region is in desperate need of Housing Supply that will balance the recent Job Growth our Region has experienced.

We have great respect for those who serve the PSRC in the General Assembly, on the Executive Board, on the Operations Committee, the Transportation Policy Board, the Growth Management Policy Board, the Economic Development Board, the Regional Staff Committee and the PSRC staff.

However, based on current realities it is time for the PSRC to change its approach. Since the state’s Growth Management Act was adopted in 1990, its most glaring and debilitating deficiencies are in two areas of primary concern: Transportation and Housing. Addressing these two vital areas ought to be an overriding focus - for purposes of scoping the new Vision 2050.

Respectfully, the PSRC has been active and well-intentioned, but has mostly failed in these two critically important areas. For that reason, an incremental approach that seeks to mostly “do some tuning” of Vision 2040 will be akin to trying to expand a home that is perched atop a crumbling foundation.

It’s not easy to press the “reset” button and start over, but there is enormous, sustained and continuing evidence to indicate that is precisely what is needed because of the importance of the growing challenges in the areas of Transportation and Housing.

On transportation, the PSRC has expended money based on ideas of how the world “ought to be” instead of acknowledging the importance of dealing with what’s actually happening. What’s happening is that employers and families are making decisions about where to locate, live and move based on

housing affordability and the transportation network. The failure of the PSRC to focus on congestion relief as a paramount responsibility now costs our region \$5 billion per year according to INRIX, Inc., which is considered the world leader in transportation analytics and connected car services. Its data and analytics on traffic, parking, and population movement are intended to help city planners and engineers make data-based decisions to prioritize spending, rather than decisions motivated by political agendas that impose enormous collateral damage and financial consequences on the region. In the last year alone, those consequences have moved us from 10th Worst Congestion in the Nation to 9th Worst Congestion in the Nation among large urban areas:

2017 Rank	(2016 Rank)	City/Large Urban Area	2017 Peak Hours in Congestion	(% of 2016 change)	% of Total Drive Time in Congestion	Total Cost Per Driver in 2017	Total Cost to the City in 2017
9	(10)	Seattle, WA	55	(0%)	12%	\$ 1,853	\$5.0 Billion

How does the \$5 billion in congestion costs for 2017 alone compare to the amount of federal transportation funding the PSRC allocated to transportation projects in 2017? We believe the answer to that question should be a direct reflection of the urgency for PSRC to prioritize congestion relief in its funding decisions and project approvals.

The PSRC should begin making regionally-based decisions that are measured against mobility and congestion relief for the region (as opposed to geographically constrained multi-modal project preferences). Failing to do so will prompt employers and workers to make re-location decisions away from the region if they do not have regional mobility and congestion relief.

We acknowledge that in the areas which will eventually be served decades from now by Link-Light-Rail there will be additional capacity. But it does not pass the “straight-faced” filter to say those plans amount to a workable solution to the region’s transportation challenges, especially freight mobility and peak hours congestion relief.

Extending a light rail line north, south and east will not be sufficient to address the transportation challenges that will accompany new regional growth that the Puget Sound Regional Council has said by 2050 will include “1.8 million more residents and 1.2 million more jobs.” PSRC has announced that such growth “means population could reach 5.8 million (42% increase from today) while jobs top 3.4 million (36% increase from today).”

Moreover, history has demonstrated pretty clearly that despite good intentions, light rail expansion cannot site and build parking garages at transit stations with capacities anywhere near what is required for the region to be able to rely on light rail to move a significant percentage of the region’s workers to and from their jobs.

Bussing those workers to transit stations (instead of drive and park) in order to transfer to light rail would likely also be problematic given the inadequacy of transit service in suburban areas as reflected in the red area is of this map prepared by Brandon Martin-Anderson of Conveyal. Martin-Anderson’s cartography identifies the number of jobs accessible by public transit commute on any given weekday morning. Dark blue areas can reach over 500,000 jobs in an hour’s transit time; dark red areas, fewer

than 10,000. This is not simply an indicator of where jobs are located, it's a reflection that the areas in red are not well-served by transit that would get workers to a job within an hour.

The data appear to indicate pretty clearly that this region is spending transportation dollars in a way that is moving the region towards becoming more congested than many other major urban areas in the nation, and leaving major portions of the region underserved in terms of access to functional and effective transportation solutions.

The other area where the PSRC has been an impediment to the success of GMA involves housing, most recently in connection with the agency's attempt to prevent small cities from accommodating additional housing needed to meet market demand.

We simply do not have enough housing for everyone who needs a place to live. As regards the PSRC's Vision 2050, our concern in this regard is two-fold:

First, for a healthy, stable real estate market we need 4 to 6 months of housing supply available to buyers.

This graph shows the severe shortage we have experienced since the end of the recession, and an unprecedented run of five consecutive years with less than 2 months of supply in King County.

[graph]

When we do not have 4 to 6 months of housing available for buyers, workers expand their search area to neighboring cities and neighboring counties in order to find a place to live, and then commute longer distances to their job. In the process, they dramatically increase the region's carbon footprint and the environmental challenges to our region's quality of life.

Shelter is necessity of life. Because the need for housing does not disappear simply because prices rise, economists characterize this necessity of life as having "inelastic demand" – meaning that when supply is insufficient to meet demand, prices rise. That is what continues to happen here.

The following six introductory paragraphs to a March 6, 2018, story in the Seattle Times summarize what has been happening in the PSRC's four-county region:

"Both Seattle and the Eastside again have smashed home-price records as the region's housing market continues to be brutal for homebuyers even before the peak spring season kicks off.

New monthly home-sales data released Tuesday showed Seattle's median single-family-home price hit \$777,000 in February, \$20,000 more than the previous all-time high set just a month prior_.

_On the Eastside, the median cost of a house was \$950,000, or \$12,000 more than the peak price from two months ago.

And yet there is little escape for people priced out of the region's most expensive markets.

_Home prices grew at least 15?percent in every county in the Puget Sound region, according to the _Northwest Multiple Listing Service.

Both Snohomish and Pierce counties set a record high for home values, even though prices historically have lagged in the winter."

<https://www.seattletimes.com/business/real-estate/new-home-price-records-777000-in-seattle-950000-on-the-eastside/>

As REALTORS® we are extremely concerned that the lack of Housing Supply to meet the Actual Market Demand for Housing that is associated with job growth - both here in King County and regionally - is producing barriers to housing the region's workforce unlike anything we have seen in more than three decades.

To further illustrate the reason for our concern, we would point the PSRC to the following examples of price increases in February data released on March 6th by the Northwest Multiple Listing Service (NWMLS):

Single-family home prices (median "SOLD" prices) were up year-over-year:

40.78 % in the Kirkland Bridle Trails area

34.31 % in the SODO/Beacon Hill area

31.25 % in the Juanita/Woodinville area

29.60 % on Mercer Island

28.88 % in the West Seattle area

Condominium prices (median "SOLD" prices) were up year-over-year:

158.36 % in the Richmond Beach/Shoreline area

93.75 % in the Bellevue/East area

63.85 % in the Skyway area

51.12 % in the West Seattle area

44.29 % in the Redmond/Carnation area

40.91 % in the Jovita/West Hill area

38.19 % in the Lake Forest Park area

30.43 % in the North Seattle area

29.34 % in the Auburn area

Second, efforts to restrict the creation of additional housing units are not well-advised and move the region farther from - instead of closer to - achieving the GMA Housing Goal in RCW 36.70A.020 (4) which focuses upon a diverse supply of housing that is affordable "to all economic segments of the population of this state."

If PSRC is going to include housing within the scope of Vision 2050 - particularly as regards the certification of local comprehensive plans - the PSRC needs to make a sea-shift departure from its past practice.

Specifically, the PSRC should base its analysis of housing (including planning for, constructing and augmenting the supply of housing) upon a timely analysis - updated at least biannually - of whether or not housing is affordable to all economic segments of the population in the county, consistent with the Housing Goal in GMA.

As a “gateway metric” to such bi-annual analysis, the PSRC should ask two questions, and evaluate the answers to the questions on a county-by-county basis:

During the most recent 24 months, could a household earning the county-wide median household income afford the median “sold” purchase price for houses and condos combined using FHA minimum down, maximum-base loan amount financing?

2. During the most recent 24 months, could a household earning 80% of the county-wide median household income afford to rent the median-priced apartment without having to pay more than 30% of monthly household income for monthly rent?

If the answer to either of those questions is “No” the PSRC should respond to the failure in that county by prioritizing both transportation project approvals and financial support for projects based upon:

How aggressively the respective city or county is modifying its comprehensive plan, zoned densities and development regulations in ways likely to improve the imbalance between the supply of housing and the demand for housing. Such changes could be evaluated by examining the percentage increase in the number of housing units that will be facilitated above and beyond the jurisdiction’s CPP total housing target, especially since the PSRC eventually acknowledged in 2017 that those housing targets are minimums, not maximums.

The likelihood that the jurisdiction’s modifications to its comprehensive plan, zoned densities and development regulations will actually be “achieved on the ground” and improve the likelihood the county will move significantly closer to achieving the Housing Goal in GMA.

The degree to which the project (for which PSRC-controlled funding is sought) will serve the housing units likely to result from the jurisdiction’s modifications to its comprehensive plan, zoned densities and development regulations.

The geographic area served by the PSRC continues to be plagued by worsening congestion that is now “9th Worst in the Nation” among large urban areas.

The lack of housing opportunities to meet the needs of the workforce in PSRC’s four-county region continues to create multi-county sprawl, especially in connection with workers commuting to work across county lines. The cost of transportation infrastructure required to address the multi-county sprawl created by the lack of housing means transportation solutions become much more complicated and expensive, not just for government, but also for workers least able to afford those commutes.

This graph by Zillow illustrates that those least-able to afford housing are also the hardest hit by the disconnect between plans for housing and transportation, and the reality on the ground:

Seattle workers earning less than \$15,000 annually must now commute an average of 21.4 miles to their job, while Seattle workers earning more than \$40,000 annually have commutes which average less than half that distance.

The lack of housing opportunities has placed the American Dream at untenable risk in the PSRC's four-county region.

Just last month, on February 27th, the Seattle Times reported that for the 16th month in a row Seattle led the nation in home price increases, a distinction that has not occurred since the turn-of-the-century:

"Seattle-area home market was nation's hottest for 2017 — and cheaper areas from Bellingham to Spokane weren't far behind

Single-family-home prices for the metro area that spans from Tacoma to Everett grew 12.7 percent in December from the previous year, according to the monthly Case-Shiller home price index,___ released Tuesday._

It was the 16th month in a row that Seattle led the nation in home-price increases. That extends a local record and is the longest streak in the nation since the dot-com bubble in San Francisco around the turn of the century.”_

<https://www.seattletimes.com/business/real-estate/seattle-area-home-market-was-nations-hottest-for-2017/>

This situation will also likely affect the potential for the PSRC's Economic Development Board to be successful in recruiting and retaining high quality employers. We believe it is unrealistic to think most local employers can pay wages high enough to allow their workers to be able to afford the region's escalating home prices and rents, and still have any hope of maintaining control of their cost structures in a way that will allow them to remain competitive in regional, national and international markets.

Conclusion

Respectfully, we request that rather than engaging in an incremental adjustment to the Vision 2040 policy approaches for transportation and housing that have failed the Puget Sound Region, it is time for the PSRC to change its approach.

The greatest challenges facing our region (within the purview of PSRC) are transportation congestion, and lack of housing supply. As PSRC scopes Vision 2050 it should acknowledge the worsening congestion that has reached increasingly higher levels of national note, and the lack of housing supply that continues to produce “hottest in the nation” housing price increases.

That congestion - and the housing crisis which both King County and the city of Seattle last year formally declared an official “emergency” - continue to be the irrefutable “reality on the ground.”

PSRC should hit the reset button, and develop Vision 2050 policies, assessments, accountability measures and project approvals/funding prioritization tied to the kinds of quantitative metrics we have suggested. We believe that failure to do so will continue to produce the kinds of enormous collateral damage that is reflected in both governmental and industry expert data.

Thank you for the opportunity to submit these scoping comments for Vision 2050.

Sincerely,

SEATTLE KING COUNTY REALTORS®

David Crowell

David Crowell, JD

Director of Governmental and Public Affairs

[email address]

12410 SE. 32nd St., Suite 100, Bellevue, WA 98005

[phone number]

[Commenter\(s\):](#)

Seattle King County Realtors, David Crowell

City Government

[City of Arlington](#)

[Communication ID: 354773](#)

[04/29/2019](#)

April 29, 2019

Erika Harris, AICP

Senior Planner, SEPA Responsible Official, SEIS Project Manager

Puget Sound Regional Council

1011 Western Avenue, Suite 500

Seattle, WA 98104-1035

SUBJECT: City of Arlington- Comments on the Draft SEIS for VISION 2050

Dear Ms. Harris,

The City of Arlington appreciates the opportunity to comment on the Draft Supplemental Environmental Impact Statement (DSEIS) for VISION 2050. The City of Arlington agrees with the transit focused growth alternative, however, there could be some additional metrics to gauge growth along Transit-Oriented Development (TOD) corridors. The ability for the City of Arlington to create TOD in the near future will be focused on Bus Rapid Transit (BRT), due to the long-range availability of Light Rail in our area. To better serve our community, as well as other municipalities of similar size in the region, the City feels there is a need for a series of metrics that could help to support BRT since the average cost per mile for BRT system that would serve Arlington is \$2,600,000 per mile, while the average light-rail project costs \$201,600,000 per mile, based on the Federal Transportation Administration's data. Creating a metric that can compare the cost per mile of projects, as well as predicted growth along the corridors as determinations for future transit funding, enables projects that are financially sustainable and are able to best serve

all communities in the Puget Sound region. In addition to the cost of the projects, the average service provided by both BRT, 60 rides per 10 minute period, and Light Rail, 400 rides per 20 minute period, requires two different requirements for density. The establishment of a metric that is able to also compare density required for services for transit based on BRT versus Light Rail, would also help to provide for the equal distribution of funds to all types of densities and facilities. The City of Arlington is supportive of the transit focused growth alternative, and certainly is in agreement with our comprehensive plan, but would like to see a way for there to be a guarantee that funding and density requirements are proportional for BRT as well as Light Rail in the future.

Thank you for the opportunity to comment in advance of determining a preferred alternative for VISION 2050. Sincerely,

Barbara Tolbert, Mayor

City of Arlington

[Commenter\(s\):](#)

City of Arlington, Barbara Tolbert

[City of Auburn](#)

[Communication ID: 354849](#)

[04/29/2019](#)

April 29, 2019

ATTN: VISION 2050 Draft SEIS Comments

Puget Sound Regional Council

1011 Western Avenue, Suite 500

Seattle, WA 98104-1035

RE: Vision 2050 DSEIS comments from the City of Auburn

Dear PSRC:

The City of Auburn appreciates the opportunity to provide comments on the Draft SEIS prepared by the Puget Sound Regional Council for the Vision 2050 update. The City understands that planning for the regional growth spread across four counties and 80 cities is a significant undertaking and poses a number of challenges. The municipalities represented in this plan range in size from a few hundred to nearly three-quarters of a million people and represent a mix of urban and rural areas, as well as a variety of transit needs and current access.

The City of Auburn holds a strong commitment to PSRC's vision for the vibrant, sustainable growth of our region, a fact underlined by our long-standing support of previous Vision strategies and by the continued certification of our own Comprehensive Plans. In the last 20 years, Auburn has transformed

it's downtown core into a transit-oriented community with the addition of a Sounder station, commuter rail line, a 636-stall transit parking garage and more than 1,000 multifamily dwelling units within a quarter mile of the transit center. Work is also underway for a second garage that will bring more than 500 additional stalls on-line within the next four years.

Draft SEIS Alternative Preference As a Core City, Auburn generally supports the principles of the Transit Focused Growth alternative. We believe that this approach is in alignment with City of Auburn objectives and that it is the appropriate aspirational objective for the four-county region .

As this region grapples with significant population growth and employment over the next 20+ years, it is essential that we implement policies, processes, incentives and other measures that encourage more efficient use of existing urban growth areas. This approach mitigates the environmental, economic and social impacts associated with sprawl.

Comments on Draft SEIS Preferred Alternative

The City of Auburn holds a unique geographic position, located partially within King County and partially within Pierce County. It is also divided by both broader urban areas to the north, west and south, and abrupt urban/rural demarcation to the east. These positional characteristics result in portions of Auburn that are well suited to prepare for, and embrace, a Transit Focused Growth alternative and other portions that are many decades away from being able to support high density, transit oriented development.

2. Despite the presence of a high-capacity commuter rail line, a regionally significant commuter transit station, and a significant existing and planned supply of commuter parking, there is a lack of local transit services to the high-capacity Auburn Sounder facility. Most residents of Auburn cannot use local transit to get to the Sounder station. This results in three outcomes: (a) fewer people utilize Sounder trains, (b) individuals who do use Sounder trains must drive their vehicle to the station, adding to local congestion and the need for additional expensive parking facilities, and (c) lower income neighborhoods whose residents cannot afford a vehicle do not have access to the commuter line, leading to community inequity.

The success of the Transit Focused Growth alternative hinges directly on robust local transit service. While this alternative places heavy emphasis on population and employment growth in close proximity to high capacity transit centers, there remain many opportunities in our community to improve connections for residents that live beyond a walkable distance to regional transit service. In addition, Auburn's ability to successfully contribute to a Transit Focused Growth alternative is ultimately contingent on service levels that are determined by outside transit providers.

3. Auburn believes that establishing land use policies targeted at greater density within close proximity to high-capacity transit is an important priority. However, such density increases would pose substantial challenges within a developed 125-year-old downtown core and would require significant financial investment. Auburn's success with increased density and transit-oriented development in recent years has come as a result of publicly funded multi-million dollar upgrades to portions of its utility infrastructure. Additional publicly funded multi-million dollar investments in utility infrastructure upgrades would be necessary in order for Auburn, and other communities, to continue achieving these types of regional objectives.

Area-wide upgrades in stormwater, water supply, sewer, fireflow, and power are a critical component of such density increases. However, many of these systems were developed decades ago to serve the lower density demands of the time. Creating systems designed to meet increased residential density is not simply a matter of developer improvements to individual properties, it is a matter of carrying out full utility system upgrades that can serve the increased demand as a whole. Beyond stressors to the current utility infrastructure, such increased density would require upgrades to mobility and transportation systems, the addition of new public park and gathering spaces, and expanded police and fire services.

Expansion of these types of services and systems are not fully funded through taxes and one time permit and impact fees. The only way to fully implement the Transit Focused Growth scenario is to fully fund investments in utility upgrades and the expansion of park and public safety services.

4. The Transit Focused Growth alternative assumes that 75% of the region's population and employment growth will occur within 1/4 to 1/2 mile of a high-capacity transit station and that this growth would occur primarily in Metropolitan Cities, Core Cities, and HCT Communities. Auburn understands that this is a regional aspiration, however it is important to note that significant capacity and growth analysis needs to occur within each of these communities in order to understand whether that goal can realistically be met.

As a historic community that is already fully built out within proximity of the existing high capacity transit station, it will be difficult for the City to force high density development to occur within these areas. Some parcels are occupied by schools that are not going to be redeveloped, some parcels are occupied with transit garages (whom do not require housing to be built into their structures and are not required to pay traffic impact fees), some areas are occupied with clusters of 80-year-old homes where a developer will be faced with the complexity of buying multiple homes and aggregating lots for redevelopment, and some parcels are occupied with well-established grocery stores and hospitals. Opportunities to create high density housing exists at all of these locations, but the pace at which it happens will be difficult to predict, hard to force, and filled with complexity along the way. Redevelopment that is considered economically viable in Seattle, Tacoma, or Bellevue is not economically viable in Auburn and many other communities. Vision 2050 needs to reflect this reality.

5. Vision 2050 applies to the full span of the four-county region. The City of Auburn believes that the Transit Focused Growth alternative is the appropriate approach for the urban area that stretches from Everett to Tacoma and from Bremerton to Bellevue, but it will be a significant challenge to successfully implement this alternative in areas that extend beyond this large urban area. As noted in comment #2 above, although Auburn is positioned within the larger Everett/Seattle/Tacoma urban area, it will be difficult to see the Transit Focused Growth objectives extend throughout our community. While the City of Auburn will appreciate being the beneficiary of future transportation investments given the presence of a high-capacity transit center within our community, this alternative has the potential to hinder other future regional infrastructure investments in other communities or to devalue their previous multidecade planning investments. Vision 2050 should not disadvantage other communities or negate the work and investment that those communities have completed in their efforts to successfully comply with GMA.

Thank you for the opportunity to comment on the Draft SEIS for Vision 2050. The City of Auburn looks forward to future regional collaboration and is appreciative of the time and energy that PSRC has committed to this effort.

Sincerely,

Nancy Backus

Mayor

Commenter(s):

City of Auburn, Nancy Backus

City of Bellevue

Communication ID: 354816

04/29/2019

April 29, 2019

Mr. Josh Brown, Executive Director

Puget Sound Regional Council

1011 Western Avenue, Suite 500 Seattle, WA 98104-1035

Re: VISION 2050 Draft Supplemental EIS Comments

Mr. Brown,

This letter represents the City of Bellevue's comments on the VISION 2050 Draft Supplemental Environmental Impact Statement. Bellevue supports the Transit Focused Growth Strategy as the best alternative to support and encourage vibrant urban centers, provide opportunities for housing and jobs near transit hub and protect the environment.

The Transit Focused Growth Strategy is the most closely aligned of the three alternatives to Bellevue's present and future planned growth pattern, for the following reasons:

The City's current growth strategy adopted in the City's Comprehensive Plan is predicated on locating most of the City's future growth into mixed use centers which include Downtown, Bel Red, Wilburton Commercial District, Factoria and Eastgate.

2. The City has adopted policies in its comprehensive plan which reinforce this growth strategy, including the land use, transportation and housing elements.
3. Large investments in public infrastructure and services are underway or planned that reinforce a transit focused growth strategy. The Eastlink light rail system is the most notable and will link the Bellevue Downtown and Redmond Overlake growth centers to other centers throughout the region. Another is the expansion of bus rapid transit services in and through Bellevue on 1-405 as included in Sound Transit 3 (ST3), the ballot measure approved in 2016 to expand high capacity transit and light rail.
4. Many of the Eastlink light rail station areas are planned as mixed-use, transit-oriented development areas, again reinforcing a transit focused growth scenario. The stations include East Main, Downtown, Wilburton, and two stations in the Bel-Red District (Spring District and 130th stations).

5. The light rail expansion projects that will be funded by ST3 include a future light rail line that will connect two other Bellevue mixed-use centers- Eastgate and Factoria- to the regional system.

The Transit Focused Growth alternative directs future growth into more compact, dense development patterns. This has advantages for Bellevue and the region, including the following:

It leverages the investment in the Eastlink light rail system by increasing the value of the land around stations. This in turn benefits the local economy.

It uses less land to accommodate future population and potentially reduces development pressures and impacts on regionally significant habitat and other ecosystems.

It yields less impervious surface than other growth scenarios which is a benefit for controlling stormwater runoff.

More people will have access to transit which helps reduce greenhouse gas emissions.

Overall transit focused development supports more accessibility to parks and recreation. Multi-modal trails, such as the Eastside Rail Corridor, will connect Downtown, Bel-Red, Wilburton Commercial District and Factoria and the corresponding transit stations.

The transit focused development scenario concentrates development around transit and increases opportunities for people to walk and bike, which can improve public health.

With increased population comes a greater need for affordable housing. The transit focused strategy envisions more density around transit stations but greater density, on its own, doesn't guarantee more affordable housing. The transit focused strategy combined with an affordable housing strategy will allow for housing in a range of affordability levels that will serve our work force.

Transit focused growth improves the jobs-housing balance more than the Stay the Course option, which benefits Bellevue.

Downtown is a designated regional activity center. The transit focused growth scenario with its focused growth in transit centers may help areas such as Bel-Red (singularly or in a combination with the Wilburton Commercial District) become eligible for the region's urban growth center designation.

Growth will bring challenges in any of the scenarios and continued regional collaboration will be required to mitigate the potential negative impacts of compact urban growth. Examples of these challenges include increasing land and development costs (such as for parks and affordable housing), environmental impacts, and ensuring coordinated transportation and land use planning. An inadequate transportation system can limit growth. Without more investments and better transportation options, we will not be able to support the growth projections for the region.

Bellevue supports proactive efforts and implementing smart technology to address the challenges that comes with growth. Smart transportation technology and public/private partnerships, such as autonomous, connected, electric and shared vehicles, are already in use and will only grow, influencing growth patterns and supporting needed multi-modal solutions.

The City will continue to work with the PSRC to develop policies and actions to support VISION 2050 as well as continue to work with regional partners to mitigate the negative impacts of growth. Thank you

for the opportunity to provide comment. If you have questions or need additional information, please contact Terry Cullen, Bellevue's Comprehensive Planning Manager, at [phone number].

Sincerely,

Mayor John Chelminiak

City of Bellevue

[Commenter\(s\):](#)

City of Bellevue, John Chelminiak, Terry Cullen

[City of Bonney Lake](#)

[Communication ID: 354334](#)

[04/24/2019](#)

April 17, 2019

Puget Sound Regional Council

Attn: VISION 2050 Draft SEIS Comment

1011 Western Avenue, Suite 500

Seattle, WA 98104-1035

RE: VISION 2050 Draft Supplemental Environmental Impact Statement

To Whom It May Concern:

VISION 2050 has the potential to be an effective regional growth planning document that would provide meaningful guidance to facilitate coordination between the counties and cities in the Puget Sound Region. However, this guidance must be balanced against the latitude given to local jurisdictions under the growth management framework in the state of Washington, which is bottom up approach, not a top down approach, to growth management planning. This bottom up approach to growth management planning is reflected in the Puget Sound Regional Council's (PSRC) 1993 Interlocal Agreement Mission Statement which provides that PSRC will adopt and maintain goals and policies"... based on local comprehensive plans of jurisdictions within the region."

The focus of the Draft Supplemental Environment Impact Statement (DSEIS) is on the Regional Growth Strategy (RGS)- the desired growth pattern within the 4-county region. At the local level, the RGS serves as guidance for the establishment of twenty (20) year population and housing targets. The City recognizes the benefits and supports a growth pattern that emphasizes compact development, supports transit, and the Regional Centers Framework. However, the City cannot acquiesce its authority or responsibility under the Growth Management Act (GMA) to plan for the actual growth anticipated in the City. Growth targets must be based on real-world

circumstances and recognize the outside forces that cannot be controlled through local policy (e.g. housing price, housing preference, etc.).

Recognizing the bottom up approach envisioned in the GMA and the desire for a growth pattern that achieves the larger regional objectives, the RGS selected must be one which can be reasonably achieved by all jurisdictions. While the City will work with PSRC and the member jurisdictions to achieve the objectives of the RGS, the City must emphasize that whatever RGS alternative is chosen, it is guidance; not a mandate. PSRC staff has repeatedly stated in various forums that VISION 2050 is intended to provide guidance and will be flexible. The City believes that mandating specific growth targets is inconsistent with the GMA and the statements made by PSRC staff. Additionally, the City is concerned that the growth targets will usurp a city's right to determine the amount of growth that it can adequately accommodate. As provided in the Central Puget Sound Growth Management Hearings Board's Final Decision and Order in *West Seattle Defense Fund v. City of Seattle*:

"... allowing a city to plan for even more growth than has been allocated to it by the county bolsters the Act's first two planning goals by encouraging that city to accept in its comprehensive plan as much growth as it determines it can adequately accommodate ..."

The City can support a preferred alternative that encourages growth to occur adjacent to transit and within centers to take advantage of the large investment the region is making in mass transit over the next two decades. However, the final alternative selected must recognize realistic growth expectations and the public and private investments that have been made based on the existing urban growth area boundaries. The City is not going to entertain actions, i.e. down-zoning, that will significantly reduce the ability of these public and private investments being realized. Similarly, the City cannot ignore the significant number of vested pipeline projects and work the City is doing to implement the objectives of the GMA.

The City does support PSRC's effort to combine certain unincorporated urban areas within other geographies in the RGS as a way of incorporating reality into the planning for the region (e.g. considering the Tacoma PAA is within the HTC Communities Geography because of a Bus Rapid Transit (BRT) route). The City believes that as part of the selected alternative it would be just as logical to include other unincorporated PAAs and Potential Incorporation Areas (PIA) under the "Core" or "Cities and Towns" Geographies because these areas are planned to be annexed or to become cities. This would ensure that the planning would support the envisioned future versus using up capacity at lower levels that could hinder annexation or incorporation. The region must maximize capacity within the existing urban growth area to lessen the need for expansion in the future. It would be contrary to the GMA to limit growth within the established UGA, once the areas are built at a lower density the capacity is gone and this may result in the need to expand the UGA in the future.

It is questionable if the growth allocations associated with the Stay the Course and Transit Focused Growth alternatives can be realistically achieved throughout the region. To achieve either of these RGS targets some jurisdictions and "Geographies" will need to grow at rates never experienced in the past 10 years, while other jurisdictions will have to take actions to significantly restrict growth. If PSRC is committed to mandating these unrealistic growth rates, how will jurisdictions that are not achieving the higher rates be evaluated during the next

comprehensive plan update? Additionally, as noted in the letter from the City of Lakewood, the "Transit Focused Growth" alternative has an explicit goal for seventy-five percent (75%) of the region's population and employment growth to occur within regional growth centers and in close proximity to high-capacity transit, this may be unrealistic. As noted in Lakewood's letter the more realistic goal is closer to sixty percent (60%).

If the region is truly committed to achieving more growth in proximity to transit, one mitigation measure that must be included in the Final SEIS is a commitment to working with the state legislature to make it easier for jurisdictions within the urban growth area to either join an existing transit district or create a transit district. PSRC must use its legislative influence to support legislation that addresses this fundamental flaw in the objective of having housing supported by transit.

The growth alternative selected must address the job-housing balances in a more realistic way. In order to address the current imbalance that is contributing to increasing commute times, more employment is needed in the South Sound. We, as a region, need to work together to identify what steps can be taken to make a more equitable distribution of jobs a reality. This is a complex issue that revolves around such issues as wages and housing prices at the sub-regional level, i.e. can a person afford to live where they work.

The City also has some concerns with the manner in which the environmental impacts are summarized in the table labeled "Summary Comparison of Alternatives Impacts" (Table E-3). It appears that the table was developed to skew the decision toward a pre-determined outcome instead of actually analyzing the impacts. The Transit Focused Growth Alternative and Reset Urban Growth Alternative are evaluated as having a negative or positive impact compared to the theoretical outcomes of VISION 2040. In taking a closer look at the data behind the colored arrows on Table ES-3, the difference in the percentages is not significant, especially considering a margin of error factor; however the DSEIS appears to convey that these small, insignificant differences are significant in order to guide the reader to the desired outcome. Examples include "How Close would Growth be to Rural and Resource Lands," "How Much would the Average Person Drive," and "What would be the Contribution to Climate Change" criteria. Additionally, some of the criterion appear to be biased towards the writer's preference. As an example, the analysis infers that multi-family is preferred over single-family specific to "Visual Quality." This is extremely subjective. A number of City residents would argue that high-density, multi-family development can be more visually intrusive and impactful.

PSRC's decision to use VISION 2040 as the baseline to determine if the alternatives have positive or negative impacts is also concerning to the City. According to Appendix E, which includes the Regional Growth Strategy Background Paper, it is evident that the VISION 2040 growth patterns have not been realized. To determine the impacts of the alternatives, including the "Stay the Course Alternative", PSRC must look at the real baseline data (2014 and 2017) provided in Appendix B - Supporting Data for Analysis and compare all three alternatives to the actual development patterns that have occurred since the initial adoption of VISION 2040. This is important information that is buried in the document, it should be more central in the analysis.

If additional information is needed, please contact the City's staff lead: Jason Sullivan-

Planning and Building Supervisor. He can be reached by phone at [phone number, email address].

Sincerely,

Neil Johnson Jr.

Mayor

City of Bonney Lake

[Commenter\(s\):](#)

City of Bonney Lake, Neil Johnson Jr., Jason Sullivan

[City of Bothell](#)

[Communication ID: 354453](#)

[04/26/2019](#)

April 29, 2019

City of Bothell

Erika Harris, AICP

Senior Planner, SEPA Responsible Official, SEIS Project Manager

Puget Sound Regional Council

1011 Western Avenue, Suite 500

Seattle, WA 98104-1035

SUBJECT: City of Bothell- Comments on the Draft SEIS for VISION 2050

Dear Ms. Harris,

The City of Bothell appreciates the opportunity to comment on the Draft Supplemental Environmental Impact Statement (DSEIS) for VISION 2050. The City of Bothell has been a long-time participant in these regional planning efforts and continues to support the Puget Sound Regional Council (PSRC) Vision 2050 process. Bothell appreciates the analysis of racial and social equity in the DSEIS and supports the inclusion of policies to advance racial and social equity in Vision 2050.

Preferred alternative -Transit Focused Growth

The City of Bothell supports the Transit Focused Growth alternative as the preferred alternative to be evaluated in the Final EIS for the Vision 2050 Plan. The City believes this should be the preferred alternative because it is most consistent with the Growth Management Act goals and principles and is supported by the Imagine Bothell/...Comprehensive Plan. As the preferred alternative it leverages investments in urban infrastructure (especially high capacity transit - HCT) in support of higher residential and employment densities. It would also do more to concentrate growth in core

areas for more walkable, livable communities and create more opportunities for affordable housing. In contrast with the 'Reset Urban Growth' alternative, this preferred alternative also avoids growth close to rural and natural resource lands.

Allow multi-county cities to manage growth allocations

Like the cities of Auburn, Milton and Pacific, Bothell is in two counties and receives separate growth targets from each county. However, Bothell is unique in that its geographic split between King and Snohomish counties is roughly 50:50. Under past practices, the City was directed to assign population and employment growth within the county providing the target. However, as the local government responsible for future land use and infrastructure decisions, the city is in the best position to determine how allocation of growth should occur within its borders, regardless of county boundaries. Under these past practices, instead of planning growth based upon the capability of transportation infrastructure, urban services, parks, utilities and other amenities, the City must assign growth based on County boundaries. The City requests the Final SEIS evaluate the impacts of allowing the City of Bothell and other multi-county communities, to allocate their entire growth targets as deemed to be locally appropriate.

Improve jobs/housing balance

The City of Bothell supports the employment re-allocation of 5% of King County's employment growth to outlying counties, including 2% to Snohomish County. This action benefits Bothell's Canyon Park Regional Growth Center as well as encourages employment to be dispersed closer to population areas. Additionally, this re-allocation is supported by Community Transit's expanding bus rapid transit system, including the Green Line that serves the employment centers within Bothell, Everett and Lynnwood with future connections to light rail.

Maintain Urban Growth Areas (UGAs)

The City has observed the benefits of the established UGA in preserving rural and resource lands by focusing growth in areas with existing infrastructure and fewer environmental constraints and supports maintaining the current UGA. Regional and local policies should continue to allocate growth within the current UGA and especially in cities that, under GMA, are the appropriate providers of urban services. Bothell requests that the Final SEIS include a brief discussion regarding the impacts associated with expansion of the UGA, particularly as it relates to the Transit Focused Growth alternative.

Analyze timing of growth relative to HCT service

One issue raised by the Transit Focused Growth alternative is the amount of delay between growth allocations and plan updates relative to completion of the transit investments this alternative relies upon. In Bothell's case, high capacity transit in the form of bus rapid transit (BRT) just recently began serving Canyon Park. Future service is planned for the SR-522 and I-405 corridors, including service to downtown Bothell and the UW/Cascadia College campus beginning in 2024. Other parts of the regional high capacity network serving Snohomish County and other parts of East King County will not come on line for another 15 to 20 years or more. Bothell supports a Final SEIS analysis that establishes a range of intermediate growth allocations that would allow jurisdictions to monitor progress relative to operation of future high capacity transit service.

Increase allocation of moderate density housing

All three alternatives result in a low percentage of moderate density housing. The Transit

Focused Growth Alternative provides the highest percentage of moderate density by allocating

19 percent toward this housing type. Moderate density housing at 12 to 49 units per acre and is an important source of affordable, market-rate housing. Further, moderate density housing is intended to be close but not immediately adjacent to transit facilities which are more appropriate for transit-oriented development. Moderate density housing also helps with the 'missing middle' housing types such as duplexes, triplexes, fourplexes, townhomes, and low-rise apartments and condominiums. The city has observed that townhomes are becoming a popular form of housing and recent projects are achieving the moderate density level.

Bothell suggests that the Final SEIS analyze a greater percentage level of moderate density housing within the Transit Focused Growth alternative by decreasing the percentage of low-density development. Another option would be to allow individual jurisdictions the flexibility to set their own percentages, provided the jurisdiction meets its assigned growth targets.

Analyze shift of growth between unincorporated urban lands and HCT communities

Bothell is aware that Snohomish County is considering a shift of population from HCT communities to the urban unincorporated and rural areas under the Transit Focused Growth alternative. This could affect lands within Bothell's assigned Municipal Urban Growth Area. The City is requesting the Final SEIS analyze the impacts of this additional growth in the urban incorporated and rural areas on adjacent cities as well as implications for future growth capacity when these areas are eventually annexed.

Thank you, again, for the opportunity to comment on a preferred alternative for VISION 2050.

If you have any questions about these comments, please contact Michael Kattermann, Community Development Director ([email address, phone number]).

Sincerely,

Andy Rheume

Mayor City of Bothell

cc: Bothell City Council

Jennifer Phillips, City Manager

Michael Kattermann, Community Development Director

Barb Mock, Director, Snohomish County Planning and Development Services

Karen Wolf, Senior Policy Analyst, King County

Brian Parry, Policy Director, Sound Cities Association

[Commenter\(s\):](#)

City of Bremerton

Communication ID: 354843

04/29/2019

Attn: Vision 2050 SEIS Comment

PSRC 1011 Western Avenue, Suite 500

Seattle, WA 98104

Email: Vision2050SEIS@PSRC.org

April 29, 2019

Puget Sound Regional Council Staff,

On behalf of the City of Bremerton, the City would like to provide the following comments regarding the Vision 2050 Update. We appreciate the extended comment period and time to review the prepared alternatives and provide comments to ensure the plan helps positively shape the future of Puget Sound communities.

The City appreciates that all three proposals within the Draft Supplemental Environmental Impact Statement have not changed the primary growth strategy that intends to help preserve resource lands, protect rural lands from urban-type development, and promote infill and redevelopment within urban areas to create more compact, walkable, and transit-friendly communities.

The City is supportive of Stay the Course and Transit Focused Growth for the future growth strategy for Vision 2050, or a hybrid of these two alternatives. It is important that the preferred alternative be the one that utilizes less land for growth, therefore resulting in a more compact development footprint that protects our environment. Compact development will also ensure that costs for local jurisdictions and our taxpayers will be reduced because infrastructure and urban services will not have to be extended out to rural areas. We support the alternative that encourages less sprawl and keeps our rural lands rural.

Bremerton believes the growth strategy should focus growth around major transportation infrastructure. With that being said, please continue to work with the City of Bremerton and Kitsap County's jurisdictions to adopt policies and transportation funding strategies that reflect Kitsap County's current and future status with public transportation. As the light-rail has plans to expand throughout the Snohomish, King and Pierce Counties, we understand the need to have smart planning strategies, and funding, around light-rail/mass transit. However, please recognize that Kitsap County's jurisdictions do not have light-rail planned. We are concerned that there may be unintended impacts if we proceed with the "Transit Focused Growth" and that Bremerton, Bainbridge Island, and Kitsap County who utilize ferry transportation, a mass transit option, are not as fully recognized by the policies that are light-rail oriented .

Please consider the impacts region-wide of the very specific light-rail policies.

The City looks forward to the progression and implementation of this guiding document.

Sincerely,

Greg Wheeler,

City of Bremerton, Mayor

[Commenter\(s\):](#)

City of Bremerton, Greg Wheeler

[City of Covington](#)

[Communication ID: 354696](#)

[04/29/2019](#)

April 29, 2019

Puget Sound Regional Council,

The City of Covington appreciates the opportunity to comment on the draft VISION 2050 growth options to date and commends the consideration applied to the draft VISION 2050.

The City generally supports the opportunities and measures in the Transit Focused Growth scenario. The DEIS demonstrates that Transit Focused Growth scenario will yield many positive outcomes; such as an 85% increase in transit trips, an 83% share of high-density King County growth, and a 16% reduction in Greenhouse Gas Emissions. However, the Transit Focused Growth scenario assumes 75% of the region's growth within a quarter to half mile from current and high capacity transit stations, which we believe seems high. In addition, the average drive time per day with Transit Focused Growth is only 2 minutes less than the other alternatives.

The City of Covington maintains concerns that selection of the VISION 2050 Transit Focus Growth option will encourage PSRC to use growth targets as a powerful tool to dictate local land use policy. To date, growth targets provided to many of the Cities and Towns have not adequately incorporated signed development agreements and local growth trends for Cities and Towns strategically located along I90 and SR18. In fact, the last PSRC certification of Covington's Comprehensive Plan was particularly troublesome. The application of the growth targets, since their inception, appeared to have changed from a "floor" to a "ceiling" to a "guide post," without regional coordination or partner city input.

Were PSRC to proceed with selection of the Transit Focused Growth scenario, the City would strongly recommend the following three items to ensure regional coordination:

Involve city staff in transparent and coordinated target-setting for each city. This way, city staff can ensure PSRC targets accurately reflect signed development agreements and local policy.

Ensure a continued definition of growth targets as a “floor” or “minimum” populations target to be met for all urban growth area, the foundational GMA requirement that applies uniformly to all the UGA regardless of size or geographic location.

Base consistency determinations on polices, such as Transit Oriented Development incentives in large cities targeted for higher levels of growth, rather than one set of numeric criteria.

Ensure that cities who comply with Vision 2050, yet due to market demand exceed their projected

growth targets, are not penalized for growth out of their control.

We appreciate the opportunity to comment and we look forward to working with you to ensure the targets for the City are set as a minimum, recognize signed development agreements, and allow for local strategic planning necessary to enable redevelopment and continued economic vitality for the City of Covington.

Sincerely,

Mayor Jeff Wagner

[Commenter\(s\):](#)

City of Covington, Jeff Wagner

[City of Des Moines](#)

[Communication ID: 354694](#)

[04/29/2019](#)

April 25, 2019

Erica Harris, AICP, Senior Planner

SEPA Responsible Official

Puget Sound Regional Council

1011 Western Avenue, Suite 500

Seattle WA 98104

Subject: VISION 2050 SEIS Comments

Dear Ms. Harris,

The City of Des Moines appreciates the opportunity to review and comment on the Vision 2050 Supplemental Environmental Impact Statement (SEIS).

The City appreciates the important work of the Puget Sound Regional Council (PSRC) and the consideration of alternatives and associated impacts related to housing affordability; economic inequality; social equity and access to opportunity; healthy communities; climate change

adaptation and mitigation; demographic shifts or changing needs; and funding for infrastructure and other improvements.

In considering the three alternatives (Stay the Course, Transit Focused Growth and Reset Urban Growth) in the context of Des Moines' growth as a city, several dynamics are crucial to consider. Urban growth patterns in the region reflect economic demand essential to development, and south King County enjoys competitive advantage in cost of land which is less than in other urbanized areas in our region. This creates job growth and subsequent demand for residential housing, transit oriented areas, and the ongoing dynamic of our city moving toward more urbanization and changing from a single family suburban residential city.

In many ways, these changes are positive. Higher transit mobility relieves demand for vehicular traffic on the grid. Local job growth, concurrent with housing development increases quality of life and provides for a more integrated community (living where one works, where families recreate together and children attend local schools). Reducing commute times and offering transit-oriented options (for example, the Metro Community Connections Shuttle program) reduces carbon emissions and assists in mitigating climate change impacts.

Transit oriented development around existing Bus Rapid Transit (BRT) and future Sound Transit stations will increase urbanization in a manner that takes advantage of transit options. This provides for the integration of transit with development patterns and reduces reliance on single occupant vehicles, reducing congestion regionally. However, it is important to note that the City of Des Moines has several challenges in accessing transit, including light rail and BRT. There is no light rail station planned within the City of Des Moines, and limited east-west options for accessing either light rail or BRT.

We would like to emphasize several critical factors that must be addressed as mitigation in the increased urbanization of Des Moines as a newly designated High-Capacity Transit (HCT) Community.

First, transportation infrastructure will include expanded light rail and current BRT. This provides for North-South transportation access. However, critical consideration must be given to "the last mile," dynamic.

The Last Mile Problem refers to the provision of travel service from the nearest public transportation node to a home or office. ¹

In the case of Des Moines (and other communities), the value of access to the transit systems will dictate their value in our community:

Though Des Moines will accommodate light rail infrastructure, it will not host a station and the half-mile radius for walkability will be interrupted by two major highways; Pacific Highway and the 509 integration with I-5.

Des Moines has a multi-layered demographic character with many senior citizens and special needs populations needing access to transit.

The light rail station at Angle Lake is usually filled to capacity by 8 am, constraining day time use of the light rail for motorists planning on parking at the light rail station.

The same is true for BRT related to capacity and access constraints.

East-west access to both light rail stations and BRT is limited and presents a barrier

to using transit. Connections to the Sounder station in Kent must be developed which would provide multi-modal options for those utilizing the east-west grid.

Emphasis must be placed on Last Mile transportation systems, allocating appropriate resources through regional transportation planning and funding.

Des Moines is also uniquely situated to accommodate water taxi service to Seattle and Tacoma. Mitigation measures should include development and funding support for water taxi services in addition to other multi-modal options, including access and parking improvements to access BRT and light rail services.

Second, mitigation measures for impacts related to displacement, social equity, and transportation should include preserving local flexibility in accommodating additional housing and employment growth.

Des Moines' ability to increase densities adjacent to light rail/BRT station areas may be limited based on vacant/redevelopable land supply. Additionally, Des Moines has planned for growth with a focus on nodes versus a dispersed pattern. BRT is located linearly along Pacific

Highway, the location of our greatest low income population. Medium density housing likewise is located along this corridor.

1 Wang, H. and Odoni, A., (2014) Approximating the Performance of a "Last Mile" Transportation System, Transportation Science, Vol. 50 #2

The SEIS acknowledges that all alternatives have the potential to displace low income households unless affordable housing opportunities or other supports are provided. It notes

that medium density housing currently provides a source of affordable housing so displacing this housing stock could impact affordability in our community. Additionally, local conditions must be recognized, such as directing a significant additional population growth to areas in close proximity of flight paths and associated noise, traffic and air quality challenges. Preserving local flexibility allows communities to plan appropriately for growth in a way that addresses these

local conditions and challenges.

Third, it is also critical that Vision 2050 accountability not only focus on numeric growth expectations, but take into account factors related to existing growth dynamics. In the situation of Des Moines (and other proximate cities), we face undue and disproportionate negative impacts from the ever increasing operations of Sea-Tac International Airport. This has both social equity and public health implications.

As Vision 2050 seeks a fair distribution of anticipated future growth, a comprehensive assessment of growth on multiple levels of regional activity must be included. The City of Des Moines is supportive of a "hybrid" alternative as the preferred alternative, with aspects of both Stay the Course and Transit Focused Growth. As noted above, maintaining local flexibility is essential in

planning for growth in proximity to transit in meeting the needs of the region as well as accounting for local conditions. The percentage of growth to be directed to areas proximate to transit in Transit Focused Growth, may be unrealistic for Des Moines, a community without light rail stations, few east-west commuter options and challenged with proximity to Sea-Tac Airport.

The City of Des Moines commented on the Vision 2050 Scoping (March 19, 2018). Here are our previous scoping comments regarding airport impact on our city:

Alternatives should include a significant discussion of aviation planning, utilizing the information developed through the PSRC regional baseline aviation study which is expected to be complete in 2019. This study is an opportunity to understand the dynamics of the region's growing aviation activity and is intended to include an evaluation of the impact of airport activities on surrounding communities.

It is state policy to work with appropriate local and regional authorities to begin the process of siting a second large commercial airport in western Washington, and Vision 2050 should provide policy guidance toward this end. The City requests that alternatives evaluated in the Environmental Impact Statement include the siting of a new international airport within the region. Environmental considerations must be critical in the decision to site new airports and this thorough evaluation of impacts to all elements of the environment due to aviation system growth must be included in the environmental analysis for this regional planning document.

Specifically, the disproportionate impacts experienced by Des Moines residents and surrounding communities due to regional population growth fueling demand for additional capacity at SeaTac Airport should be thoroughly analyzed for all alternatives, including impacts on human health and to air and water quality.

SeaTac is growing rapidly and Vision 2050 should also provide policy guidance to assure that multi-modal options are the standard for addressing SeaTac Airport growth. Constraints on the capacity of the regional transportation grid to absorb millions of more passengers and tons of cargo must be seen as signaling consideration of new airport facilities that will relieve congestion, not simply add to it. The integration of the state aviation system into regional transportation planning is essential to the accommodation of future demand at SeaTac and elsewhere.

The ability to implement sustainable measures to protect the natural environment, human health, mitigate noise and understand any adverse health impacts of jet fuel emissions is an essential component of the regional transportation system, and is a constraint on future airport capacity, expansion and growth.

Since these scoping comments were made, State legislation is under consideration with wide support directing study of the siting of a second regional airport. This consideration and support should be incorporated as appropriate mitigation and associated policies in the SEIS and Vision 2050. PSRC's own regional air transport study, as discussed above, should also assess impacts from regional distribution of aircraft operations on adjacent, impacted communities. As Sea-Tac Airport moves forward with their Sustainable Airport Master Plan (SAMP) we encourage Vision 2050 to incorporate that growth plan into regional planning regarding Vision 2050. (We also

would hope that PSRC will offer comments on the environmental assessment of the SAMP relative to Sea-Tac impacts on regional growth.)

Thank you for the opportunity to comment, and for serious consideration of the City's comments and concerns. We look forward to the opportunity to continue this discussion on behalf of all of our residents.

Sincerely,

Matt Pina

Mayor

Michael Matthias

City Manager

MP:MM/bw

[Commenter\(s\):](#)

City of Des Moines, Michael Matthias, Matt Pina

[City of Edmonds](#)

[Communication ID: 355089](#)

[04/29/2019](#)

May 1, 2019

Erika Harris, AICP

Senior Planners, SEPA Responsible Official, SEIS Project Manager

Puget Sound Regional Council 1011 Western Avenue, Suite 500

Seattle, WA 98104-1035

SUBJECT: City of Edmonds' Comments on VISION 2050 DSEIS

Dear Ms. Harris,

The City of Edmonds appreciates the VISION 2050 process that brings our region together to plan for the future. Comments here are in response to the Draft Supplemental Environmental Impact Statement ("Draft SEIS") for VISION 2050.

Preferred alternative-Transit Focused Growth

Of the three alternatives, Transit Focused Growth is preferred. This alternative recognizes the value of transit and that growth needs to be concentrated most near suitable transit stations, especially where light rail will be located. It also recognizes the importance of planning for designated centers within incorporated urban growth areas, a notable feature of VISION 2040 that carries forward.

Some flexibility at local level

In selecting an alternative and finalizing the SEIS, attention needs to be paid to maintaining some level of flexibility at the countywide level, where cities and the county can work together on certain details, yet be consistent with regional objectives and outcomes.

Maintaining urban growth areas

The final SEIS should include discussion of the impacts of maintaining vs. expanding urban growth areas.

Expanding urban growth areas into rural areas can negatively affect opportunities for moderate density growth in cities and their future annexation areas, as well as exacerbating traffic problems and causing the loss of rural and resource lands.

Climate change

The SEIS should discuss climate change and the importance of significantly reducing carbon emissions.

Selecting Transit Focused Growth as the preferred alternative is most compatible with reducing greenhouse gas emissions. The range of climate impacts needs to be considered for each alternative.

Finally...

Thank you for considering our input. The City of Edmonds looks forward to participating in VISION 2050 planning, knowing that each city and county in the central Puget Sound region has a shared future that will be served best by adhering to regional goals, while maintaining local character.

Sincerely,

David O. Earling

Mayor, City of Edmonds

cc: Edmonds City Council

Shane Hope, Development Services Director

Phil Williams, Public Works Director

[Commenter\(s\):](#)

City of Edmonds, David Earling

City of Everett

Communication ID: 354853

04/29/2019

April 23, 2019

Erika Harris, AICP

Senior Planner, SEPA Responsible Official, SEIS Project Manager

VISION 2050 SEIS Comment,
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104

Dear Ms. Harris:

The City of Everett appreciates the PRSC's outreach efforts and the opportunity to provide comments on the Vision 2050 Draft SEIS. The City has reviewed the draft SEIS and appendices and offers comments for consideration as the PSRC crafts a Preferred Alternative and the Final SEIS for Vision 2050.

As the only Metropolitan City within Snohomish County, Everett will see significant population and job growth between now and 2050. Everett accepts this important role and regional expectations. Everett has been actively developing plans to implement the Regional Growth Strategy since Vision 2040 was adopted in 2008. Despite these efforts, the growth in Everett, the region, and within Snohomish County has not aligned with the regional vision.

Many of the expectations of Vision 2040, and the growth targets that have been adopted into local comprehensive plans, are based on assumptions that may no longer be valid in our evolving national and regional economy. As we consider extending our growth strategy, it is critical that the PSRC examine; what has worked well with Vision 2040, what assumptions have not been successful and why.

Previous Communications

Everett has participated with other local governments through Snohomish County Tomorrow (SCT) to reach out early to the PSRC and establish a clear understanding of the process, and issues to be addressed in the Vision 2050 update to the adopted Vision 2040 Regional Growth Strategy (RGS). We appreciate PSRC considering the input and feedback provided through SCT.

2. The Vision 2040 RGS, adopted in 2008, established "regional geographies" that created a hierarchical priority for assigning where future population and job growth should occur. This approach established that Metropolitan cities should be the top priority for accommodating significant shares of growth, with lower percentages allocated to Core cities, large cities, small cities, and unincorporated urban areas. Everett advocated against allocating growth according to the Vision 2040 regional geographies. Instead, we recommended a more direct approach to allocating to locations where planned high capacity transportation investment could efficiently serve centers for growth.

3. In the December 7, 2017 letter to the PSRC, SCT also endorsed a revised strategy for distributing future growth with Vision 2050. Everett appreciates the proposed revision to "regional geographies" that more closely aligns with this approach, particularly with the Transit Focused Growth alternative, which allocates growth near high capacity transit stations, whether in cities or unincorporated urban growth areas. This is especially important within Snohomish County, where two of the ST3-funded light rail stations will be located in what are currently unincorporated urban areas.

Draft Alternatives and Growth Since 2008 Adoption of Vision 2040.

4. The population and job growth targets for the three alternatives identified in the Draft SEIS reflect the revised approach to regional geographies, particularly for Everett and Snohomish County. The Stay the Course alternative would result in a greater amount of population and job growth in Everett than the Transit Focused Growth alternative, which in turn would place more growth in Everett than the Reset Urban Growth alternative. The significant transit investments being made in light rail service under ST2, will bring light rail to Lynnwood by 2024. ST3 will build additional light rail stations south of, and within Everett by 2036. Based on these funded investments, the growth numbers in the Transit Focused Growth alternative have a more realistic chance of being realized than those associated with the Stay the Course alternative.

5. Since Vision 2040 was adopted in 2008, development activity in Snohomish County has followed a pattern closer to the Reset Urban Growth alternative than the growth called for by the current RGS. Growth rates in the unincorporated UGA have greatly exceeded those of the Metropolitan city (Everett) and the Core cities (Lynnwood and Bothell). This pattern is inconsistent with the Vision 2040 RGS growth numbers, and makes the Stay the Course alternative much less likely to be successful in the Vision 2050 update.

6. One lesson from our experience with Vision 2040 has been that the realities of the regional real estate market have far more influence on where growth occurs than aspirational goals stated in regional or local plans. Without substantial investments in economic development and transportation infrastructure improvements, it is difficult to see how these trends will change.

Growth Targets

7. Vision 2050 should take a pragmatic look at how population and job growth figures associated with the preferred alternative will be used in setting growth targets in local plans. The region needs to be able to adjust when unforeseen shifts in the regional economy change the fundamental assumptions used to establish growth numbers. Vision 2050 and implementing County-wide Planning Policies (CPP's) should provide flexibility and allow modification of local targets when it becomes clear that growth assumptions are not in line with the realities of market forces. Vision 2050 should state that the purpose of its growth guidance is to help local jurisdictions set growth targets, and acknowledge that growth figures are based upon regional aspirations and other assumptions that local jurisdictions have little ability to control on their own. It would also be helpful to state that local jurisdictions are not required by law to realize the aspirational targets, just to provide sufficient land capacity, zoning, and investment strategies to accommodate adopted growth targets. If local jurisdictions are going to achieve the growth targets as assigned, PSRC needs to do more to support incentives and innovative land use tools to that end.

8. Each of the three Vision 2050 alternatives would have much more growth in Everett than provided for under our 2035 comprehensive plan growth targets, as indicated below:

	2035 Everett Growth Targets	2050 Stay the Course	2050 Transit Focused Growth	2050 Reset Urban Growth
	-----	-----	-----	
Population	165,000	230,000 (+65,000)	197,000 (+32,000)	192,000 (+27,000)

| Employment | 140,000 | 201,000 (+61,000) | 194,000 (+54,000) | 187,000 (+47,000) |

9. To illustrate the challenge with the growth figures under the three Vision 2050 alternatives, Everett's population would have to grow at an annual average rate between 2017 and 2050, ranging from 2,485 for the lowest alternative (Reset Urban Growth) to 3,636 for the highest (Stay the Course). Since 2000, Everett's population has grown at an average annual rate of only 1,095. We would have to more than double our growth rate for the lowest growth alternative, and more than triple it for the highest growth alternative. Such a turnaround is not easily accomplished. To realize such a dramatic increase in our rate of growth will require more than just "bending the trend." It will require commitments throughout the region that to date have not existed.

10. Everett has taken a number of steps since the 2008 Vision 2040 RGS was adopted to increase the City's population and job growth capacity and incentivize the development process for higher density mixed use development in the City's transit corridors. These include new zoning in the north Broadway corridor, new zoning and other incentives in the Evergreen Way corridor, a new plan in the Everett Station area, which has recently been replaced by the Metro Everett Subarea Plan (with new zoning and other development incentives) that also includes downtown Everett. Despite these plans, zoning, and other incentives, few developers have taken advantage of these opportunities. Since the initiation of Swift BRT service in the Evergreen Way corridor in 2009 and the Evergreen Way rezoning in 2012, only one new multi-family development has been built in this 6.5 mile long corridor.

11. We believe the lack of development in our priority growth and transit areas is due to many factors, most of which the City has little influence to change in a way that would create more demand for development in Everett. The growth patterns in Snohomish County for the past decade indicate a preference for developing raw land in other communities, rather than the more challenging task of redevelopment in Everett. Consumer preference for single-family detached housing has favored development outside Everett, which has little land available for building more of this housing type. The strong job growth and demand for rental housing in Seattle and King County favors multi-family development there over the lower rent levels a developer can achieve for rental housing in Everett. While this recent trend may change in the future, it is highly unlikely we will be able to add population at two to three times the pace of the past two decades if the status quo persists.

12. The emphasis of the statements in paragraphs 6 - 11 is that Everett, independently, cannot commit to any specific target at this time. We can evaluate how to create additional capacity for growth in subsequent planning efforts to take place after the adoption of Vision 2050, but without the PSRC and our regional partners enacting new incentives for growth in communities like Everett, cannot presume that the growth numbers of any of the alternatives are accurate over the next 30 years.

**** Impacts of Draft Alternatives ****

13. We note that from the perspective of environmental impacts, as described in the Draft SEIS and appendices, that the Transit Focused Growth alternative has the least overall impact to the environment across the region compared with the other alternatives. The many metrics used to compare overall impacts across all three alternatives show a consistently better environmental outcome from Transit Focused Growth.

14. PSRC has provided a separate matrix identifying the overall impacts of the alternatives within Snohomish County, which differs from the overall impacts within the region. However, the matrix still shows Transit Focused Growth as having the least environmental impact within Snohomish County among the three alternatives.

Updated Multi-county Planning Policies (MPPs)

15. In reviewing the draft policy amendments in the Multi-county Planning Policies (MPPs), Everett agrees with most of the proposed policy amendments. The additional emphasis on maintaining stable urban growth area boundaries, addressing equity, climate, transit oriented development, affordable housing, access to opportunity, improved mobility options, air and water quality, and improved coordination among public service providers, are an improvement to the current MPPs. The revised policies will serve as a strong foundation for updates to the CPPs for each of the counties.

16. Everett's elected officials previously sent a letter asking that Vision 2050 include a climate change element (see attached letter from Mayor Franklin and Everett City Council). It is critical that a Vision 2050 provide strong policy guidance for a regional climate strategy among local governments and regional partners that addresses greenhouse gas reduction, and adaptation to the impacts of climate change.

17. The draft Economy policies and actions do not mention the opportunities for economic growth in our region presented by the challenges of climate change and the emerging green economy. Growing the Green Economy in Washington State, recently published by the Association of Washington Cities Center for Quality Communities, provides an excellent resource the PSRC can use to strengthen regional policies and promote sustainable growth through the economic development elements in local comprehensive plans.

**Selection of a Preferred Alternative **

18. Everett favors the Transit Focused Growth alternative, as it emphasizes future growth in proximity to high capacity transit service and facilities, and has the least overall environmental impact among the three alternatives. In crafting a Preferred Alternative, PSRC should also consider beneficial aspects of the other two alternatives. For example, Stay the Course places a greater amount of employment growth in Kitsap, Pierce and Snohomish counties, and less in King County, which would improve the jobs-housing balance. Additional job growth in the other three counties could reduce the need for travel into King County and the transportation costs and environmental impacts associated with this commute pattern.

19. Would it be possible to consider a preferred alternative that distributes even more job growth to the other three counties and less to King to promote a better jobs-housing balance?

20. The population and employment growth figures for whatever hybrid may be selected as a preferred alternative, while illustrative of the order of magnitude of the growth the region must accommodate, cannot be viewed as hard targets at this stage of the planning process. Much more planning work at the countywide and local level, including CPPs, buildable land analyses, local visioning, and public input, must take place to establish realistic and supportable growth targets for individual jurisdictions. MPPs and CPPs must allow for flexibility in setting numerical targets for population, housing and employment growth.

21. Vision 2050 should identify how the RGS will assist local jurisdictions to create a more favorable environment for the economic investment needed to become successful in attracting the desired shares of population, housing and job growth, especially for jurisdictions that have not experienced the levels of growth anticipated in Vision 2040.

Other Comments / Considerations

22. While Sound Transit may not be ready to talk about expansion of the RTA district boundaries at this time, the 2050 time frame of this update to the RGS should include consideration of how to serve urban growth areas located beyond the current RTA boundaries with the light rail line, at least in Snohomish County. Vision 2040 was predicated on the extension of light rail service, and was adopted before either ST2 or ST3 were approved by voters. Vision 2050 should include transportation policies or actions that address the need for continued regional investment in light rail and other high capacity transit modes beyond the current Sound Transit system plans. Vision 2050 should also incorporate, to the extent possible, how other advancements in transportation technology will impact regional growth trends.

23. Following the adoption of Vision 2050, the subsequent update of the regional transportation plan must prioritize facilities and modes that implement the vision and support growth in regionally designated centers.

24. Annexation under current State statutes is difficult. Everett supports DP-Action-9, which calls for actions to address current barriers to annexation.

25. DP-Action-10 should be amended as indicated below to remove the expectation that cleanup of local brownfield properties will necessarily involve countywide planning bodies.

Identification and Clean-up of Underused Lands: [Strike: Countywide planning bodies, in cooperation with their cities,] [Insert: Local governments, in cooperation with State and/or federal regulatory agencies,] will develop strategies for cleaning up brownfield and contaminated sites. Local jurisdictions should identify underused lands (such as environmentally contaminated and surplus public lands) for future redevelopment or reuse.

26. The strengthened housing policies and actions call for a much-needed regional housing assessment. Local jurisdictions struggle to create capacity for the number of housing units needed to accommodate regional growth. The mismatch between the cost to produce housing and the affordability needs of households will require a concerted regional effort. In the Final SEIS for the preferred alternative, please estimate the number of housing units by type (single-family detached, multi-family, etc.), tenure (owner-occupied, rental), based on projected household income ranges (relative to Area Median Income for each county) needed for individual jurisdictions, if available. It is critical to better align future housing types with the anticipated income levels of future households within each jurisdiction. If not available for each jurisdiction, the PSRC should consider how to develop this type of information to assist local jurisdictions as they work on their 2023-24 comprehensive plan updates.

27. Implementing regional goals and local planning priorities requires stable funding sources for local government services and capital facilities. Washington's local governments struggle with structural imbalances between the cost to provide services and capital facilities, and the lack of sustainable revenues. As a state and region, we inadequately fund transportation, utilities and other public

infrastructure. Without fundamental reforms in how local governments in the state of Washington are funded, it is unlikely the regional vision can be fully realized.

In closing, Everett enthusiastically supports developing Vision 2050 and will actively participate in the plan progresses toward final adoption. Please contact planning director Allan Giffen or, Deputy Mayor Nick Harper if you wish to clarify any of these comments.

Sincerely,

Cassie Franklin, Mayor

Cc:

City Council

Nick Harper, Deputy Mayor

Allan Giffen, Planning Director

[Commenter\(s\):](#)

City of Everett, Cassie Franklin

[City of Everett \(climate-specific comment\)](#)

Communication ID: 353930

04/18/2019

April 17, 2019

To: PSRC Executive Board

Josh Brown, PSRC Executive Director

From: Everett Mayor Cassie Franklin and the Everett City Council

RE: Request to include a climate change element in the Vision 2050 plan

Dear Executive Board members and Executive Director Brown:

Thank you for the opportunity to comment regarding the Vision 2050 Regional Growth Strategy Draft Supplemental Impact Statement. This communication represents the City of Everett's (City Council and Mayor) comments regarding the overarching issues associated with climate change and the structure of the Vision 2050 plan. More detailed comments regarding Vision 2050 will be provided under separate communication from Everett Planning Director Allan Giffen.

We appreciate PSRC 's recognition that "Climate change is of growing urgency... " in the Regional Growth Strategy. Moreover, we appreciate and generally support and encourage policies supporting cleaner transportation, electric vehicle technology, transit oriented development, growing transit communities, and improving green infrastructure.

The elected leaders of the City of Everett recommend PSRC consider climate change as a stand-alone element in the Regional Growth Strategy, Vision 2050. Given the seriousness and "growing urgency" of climate change and climate impacts, we believe a regional growth strategy looking to the year 2050 should include a climate change element that addresses mitigation (reducing greenhouse gas [GHG] emissions), adaptation (responding to the consequences of a

changing climate, including in the area of emergency services) and green economic development (building the green economy). Such an action would underscore the seriousness of this issue, establish a framework for long range planning, and elevate the importance of responding to climate change issues as part of a regional strategy.

To that end, we recommend PSRC adopt a standard metric for measuring GHG, develop a region-wide strategy for electric vehicle infrastructure, and a blueprint for developing the green economy. There is a well-recognized standard metric for measuring GHG emissions that is used by the Puget Sound Clean Air Agency, King County and its cities (K4C Group), the City of Everett,

Snohomish County and others, known as the carbon wedge analysis. This structure should be adopted for the region to measure and monitor GHG emissions over time. Also, the "Economy Chapter" does not appear to recognize the green economy or green economic development as an economic development opportunity. This should be added to the Economy Chapter.

The Everett City Council recently adopted a resolution calling for the development of a Climate Action Plan (copy attached). Other cities have taken similar actions, and the City of Seattle has had a climate action plan in place for many years. Our resolution calls for addressing mitigation, adaptation and green economic development. We hope it will inform your efforts.

Based on science, experience and history, climate change issues will continue to grow in importance and should be part of any regional growth management strategy looking to 2050. We urge PSRC to directly address climate issues by adopting a stand-alone element in the Vision 2050 Regional Growth Strategy.

Sincerely,

Cassie Franklin, Mayor

Scott Bader, Council President

Judy Tuohy, Council Vice President

Paul Roberts, Council Member

Jeff Moore, Council Member

Brenda Stonecipher, Council Member

Scott Murphy, Council Member

Elizabeth Vogel, Council Member

Resolution No. 7359

A Resolution requesting

the Everett Planning Commission

Prepare a Climate Action Plan

for the City of Everett

WHEREAS, climate change presents an existential threat to human existence on the planet, and impacts associated with climate change are being realized at global, national, regional and local levels; and

WHEREAS, appropriate responses to climate change include rapidly reducing green . house gas emissions (GHG)- (aka mitigation), preparing for circumstances such as storm events increasing in frequency and intensity, rising temperatures, flooding, fires and sea level rise- (aka adaptation), and preparing for economic impacts; and

WHEREAS, the City of Everett has taken steps to better understand and respond to climate change, reducing GHG emissions and preparing for climate change, including: adopting a "Climate Change And Sustainability Element" in the City's Comprehensive Plan in 2015, studying Everett's carbon footprint in 2016, updating the City's Emergency Management Plans in 2017 & 2018, updating elements of the City's Comprehensive Plan to improve transit oriented development and link housing and transportation in 2018, as well as ongoing monitoring of water supply and flooding along the Snohomish River; and

WHEREAS, the City's Climate Change And Sustainability Element calls for development of a Climate Action Plan to be prepared in collaboration with the Puget Sound Regional Council, Puget Sound Clean Air Agency, Snohomish County PUD, Snohomish County, and the State Department of Ecology; and

WHEREAS, the City's Climate Change And Sustainability Element calls for public participation, outreach and education to reduce GHG and adapt to climate change; and

WHEREAS, the City's Climate Change And Sustainability Element recommends a number of steps to respond to climate change including but not limited to: reducing GHG generated by transportation, improving building energy use and efficiency, solid waste reduction, green economic development, and adapting to impacts of climate change; and

WHEREAS, the Governor and Legislature are considering measures to reduce GHG, mitigate and adapt to climate change; and

WHEREAS, the Everett City Council believes the policies set forth in the City's

Climate Change And Sustainability Element should be implemented;

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF EVERETT

Section 1. The Everett City Council directs the Everett Planning Commission to prepare a Climate Action Plan (CAP), consistent with the recommendations set forth in the City's Climate Change And Sustainability Element of the Comprehensive Plan, adopted in 2015 (Appendix A- GOALS AND POLICIES OF THE CLIMATE CHANGE AND SUSTAINABILITY ELEMENT). The CAP should be prepared with input from appropriate agencies and organizations including but not limited to Puget Sound

Clean Air Agency, Puget Sound Council of Governments, Snohomish County PUD, Department of Ecology and other organizations with technical expertise.

Section 2. The CAP shall at a minimum: address mitigation (reduction of GHG) through efficient transportation, conservation and energy efficient buildings; address adaptation by preparing for higher temperatures, increasing storm events, floods, fires and sea-level rise; and seek green economic development opportunities. ·

Section 3. The CAP shall set targets for reducing GHG, and adaptation; and recommend implementing measures to meet policy objectives including but not limited to:

Establish a goal for 100% renewable energy by 2045,

Support zero emission vehicles and electric vehicle-charging infrastructure,

Support low carbon fuel standards,

Improve building efficiencies, and

Link emergency management plans with adaptation measures

Section 4. In preparing the CAP, the Planning Commission will seek public input and seek opportunities to educate and inform Everett residents on the science of climate change and actions they can take to reduce GHG and adapt consistent with the recommendations in the Comprehensive Plan, Appendix A.

Paul Roberts

COUNCIL MEMBER INTRODUCING RESOLUTION

PASSED AND APPROVED THIS 3rd DAY OF APRIL, 2019

SCOTT BADER, COUNCIL PRESIDENT

[Commenter\(s\):](#)

City of Everett, Scott Bader, Cassie Franklin, Jeff Moore, Scott Murphy, Paul Roberts, Brenda Stonecipher, Judy Tuohy, Elizabeth Vogel

[City of Everett \(verbal comment\)](#)

[Communication ID: 354343](#)

[04/25/2019](#)

[City of Everett Councilmember Paul Roberts provided the following public comment at the April 4 Growth Management Policy Board.]

Thank you Chair Mello and members of the committee. I may be actually under your second group but none the less I am delighted to be here and good to see you all. I am wearing the hat of the City of Everett in addition to my colleague Scott Bader today, but I'm also I think informally wearing a hat of the

Puget Sound Clean Air Agency and I'm here to urge as we go forward with 2050, the planning horizon of 2050, that we really take two or three things into account.

First, is that we look at developing a single metric for the region in terms of monitoring greenhouse gas emissions and we already have much of that work done for us. The K4C group in King County, Snohomish County, the City of Everett, and I suspect other jurisdictions have been looking at the metric used by the Puget Sound Clean Air Agency as well as Climate Solutions. That metric has been adopted by those jurisdictions so I think we have a framework that we can use. Which as an old public works director, emphasis on old, you don't manage what you don't measure and we need to have a measurement structure that looks at the whole region.

Secondly, I would encourage the elevation of climate change as an issue seems hard to imagine adopting a plan for 2050 and not having that as a significant component and lastly our Council last night adopted a climate action plan resolution which instructs our planning commission to develop that we will provide to you a letter and this information as part of our comment. I wanted to encourage the consideration that we elevate climate change, we develop a metric structure, and I look forward to working with you in my other hat on the Transportation Policy Board as your colleague, so thank you for the time.

Commenter(s):

City of Everett, Puget Sound Clean Air Agency, Paul Roberts

City of Issaquah

Communication ID: 355093

04/29/2019

22 April 2019

Ms. Erika Harris

Puget Sound Regional Council

1011 Western Ave # 500

Seattle, WA 98104

RE: Vision 2050 draft Supplemental Environmental Impact Statement (SEIS)

Dear Ms. Harris:

Thank you for the opportunity to comment on PSRC's draft SEIS, and for your presentation to the City Council on April 1, 2019.

Following that meeting, the City Council conducted a public hearing on April 8th, 2019. Additionally, the City Council had a discussion on April 15th, 2019 at their regular city council meeting and provided comments on the three alternatives.

The Council recognized differences in impacts between the alternatives, and showed support for Alternative 1 and 2, although there were additional questions about the supporting information and analysis, which I have included in an attachment to this letter. I have summarized those Council considerations by alternative below; and, have attached a more detailed summary to this letter.

Alternative 1 – Stay the Course

High level feedback:

Councilmembers felt that this alternative is aligned with our current city planning efforts and vision and, therefore, this alternative's potential future results may be better understood and familiar.

Alternative 2 – High Capacity Transit (HCT) focus

High level feedback:

Councilmembers felt this alternative would provide the greatest positive environmental impact

Councilmembers voiced concern that this approach does not classify Issaquah's two transit centers as HCT and that may create increased competition for limited transportation funding

Councilmembers shared concerns about the likelihood of displacement of people and the affordable housing inventory

Alternative 3 – Dispersion

High level feedback:

Issaquah's City Council does not support this alternative

Councilmembers believe this alternative will result in a significant increase in congestion at the eastern edges of the Urban Growth Boundary

Please contact Development Services Director Keith Niven if you have any questions.

Sincerely,

Mary Lou Pauly

Mayor

Cc.

City Council

Emily Moon, City Administrator

Andrea Snyder, Deputy City Administrator

Keith Niven, Economic Development & Development Services Director

[Commenter\(s\):](#)

City of Issaquah, Keith Niven, Mary Lou Pauly

City of Kirkland

Communication ID: 354749

04/29/2019

April 16, 2019

Puget Sound Regional Council

1011 Western Avenue, Suite 500

Seattle, WA 98104

RE: VISION 2050 SEIS Comment

Dear Puget Sound Regional Council,

This letter comprises the City of Kirkland's formal comments on the Draft Supplemental Environmental Impact Statement (SEIS) for Vision 2050.

We commend PSRC on identifying and evaluating three meaningful growth alternatives for the region, all of which would substantially increase transit ridership, reduce per capita vehicle miles traveled, and reduce greenhouse gas emissions. At this time of robust economic growth, and increased concern about regional traffic, housing affordability, and environmental protection, it is time to double-down on a growth strategy that focuses on infill development primarily within urban growth centers, and protection of resource lands. Therefore, we are pleased that all the evaluated alternatives conform to Vision 2040's underlying principle: growth focused into metro and core cities. Adherence to this principle will ensure that the quality of life and environment in the region is protected, paving the way for continued economic success.

While the City of Kirkland is pleased with the overall analysis in the SEIS, we offer the following big-picture comments:

Equity/Displacement Analysis. The equity/displacement analysis seems to overlay job growth and demographic characteristics (e.g., communities of color, low-income communities) to yield equity/displacement impacts. In a dynamic economy, this may be an oversimplified approach to evaluating a complex and important issue, and could suggest that policymakers limit job growth in lower-income areas, when job growth might actually be beneficial to such populations. We agree with the focus on expanding housing affordability in these areas, but would also suggest that a more nuanced displacement analysis be undertaken that accounts for some of the social benefits of economic growth in areas that have historically been bypassed by economic development.

Utilities/Infrastructure. The SEIS notes that the Transit Focused Growth alternative could reduce the need for new infrastructure compared to the Stay the Course alternative. On its surface, this conclusion is logical, although experience suggests that upsizing infrastructure to accommodate infill growth in urbanized areas may be significantly more resource-intensive and expensive than extending infrastructure to greenfield areas. This means that it may be harder for local

governments/agencies to build the infrastructure that may be needed to accommodate increased growth in already-urbanized areas. The SEIS should explore what additional public or private support might be needed to allow for infrastructure development under the Transit

Focused Growth Alternative.

Affordable Housing. Since housing affordability is critical to achieving any of the growth strategies, and housing affordability continues to be heavily influenced by local decisions, how would declining affordability affect achievement of any of the growth alternatives? Beyond the laundry list of housing streamlining and affordability measures on page 105 of the SEIS, what are the housing affordability assumptions underlying the feasibility of each alternative, and what is expected of local governments in terms of promoting housing affordability and diversifying a housing stock that on a regional scale, at least, primarily comprises single-family units?

After having reviewed the SEIS, the City of Kirkland is most strongly in favor of the Transit Focused Growth Alternative (75% of the region's growth occurring near high-capacity transit), which is most in alignment with the City's growth strategy. Under this alternative, 57% of growth would be in higher-density settings (compared with 46% for the Stay the Course alternative and 44% for the Reset Urban Growth alternative). The transit alternative also takes less land, would boost transit ridership the most, and would have the most beneficial effects on reducing daily per capita drive time.

One last point: Kirkland is pursuing designation of Downtown as an Urban Growth Center in 2019. Based on discussions with PSRC, that designation would not impact Vision 2050, since the City already has an existing Urban Growth Center. However, we would appreciate a reference to the planned designation in the SEIS and Vision 2050. In addition, we believe that Downtown Kirkland already surpasses the minimum activity unit threshold to qualify for an Urban Growth Center, with appropriate planning policies in place, meaning that Downtown is well-positioned for additional growth and transportation investments.

For more information, please contact Adam Weinstein, Director of Planning and Building, at [phone number, email address].

Sincerely,

Kirkland City Council

Penny Sweet, Mayor

City of Kirkland

cc: Kirkland City Councilmembers

Planning Commission

[Commenter\(s\):](#)

City of Kirkland, Penny Sweet, Adam Weinstein

City of Lake Stevens

Communication ID: 354785

04/29/2019

April 25, 2019

Erika Harris, AICP

Senior Planner, SEPA Responsible Official, SEIS Project Manager

Puget Sound Regional Council

1011 Western Avenue, Suite 500

Seattle, WA 98104-1035

RE: Lake Stevens Draft SEIS Vision 2050 Comment letter

Dear Ms. Harris,

Thank you for the opportunity to provide comment on the Draft Supplemental Environmental Impact Statement (DSEIS) for Vision 2050.

Since the inception of Vision 2040, the Puget Sound Region has changed dramatically with significant localized population growth, regional investment in transportation infrastructure and expanded employment opportunities. As the Puget Sound Regional Council (PSRC) contemplates updates under Vision 2050, it is critical that the regional plan identifies an equitable distribution of population and employment growth targets to satellite cities and towns not connected to regional transportation spines or growth centers. Cities and towns offer an option to maintain traditional neighborhoods that meet market preferences, provide local growth centers for focused employment supporting local job to housing balances and supply reduced barrier I attainable housing options.

Lake Stevens as a community endorses the development of a hybrid approach that includes concentrating significant growth along transit focused areas, but with a greater allocation of growth distributed to cities and towns. The proposed allocation to Metropolitan Cities (Everett), Core Cities (Bothell and Lynnwood) and High-Capacity Transit (HCT) Communities in Snohomish County is too high at the expense of stagnating growth in cities and towns. For example, the Lake Stevens UGA has achieved approximately 70% of its 2035 growth target. A small remnant allocation to cities and towns would negatively influence local economies as demand for services increase. Rather than intensifying allocations to outlying unincorporated rural areas, growth adjustments should be concentrated along the fringes of developed urban growth boundaries, or between UGA boundaries near one another to allow efficient land development and delivery of urban services.

As suggested in the SCT comment letter there needs to be flexibility in local goal setting:

"SCT believes that the growth figures provided in the RGS should recognize economic fundamentals and realistic timelines for realization of these shifts in future growth distributions. This recognition is warranted given the uncertainties in timing of the necessary urban infrastructure investments and

anticipated market responses. As such, the RGS growth allocations should be provided by PSRC as guidance to the subsequent Countywide Planning Policy/local target setting process. The region needs to be able to adopt and adjust when unforeseen shifts in the regional economy occur or growth opportunities in local urban centers in cities and towns change the fundamental assumptions used to establish the growth assignments."

For Vision 2050 to be successful, it is imperative that communities working cooperatively under countywide planning policies retain the ability to redistribute local growth targets as appropriate. As a primary pillar of the Growth Management Act, local jurisdictions need to be able to develop comprehensive plans and land use policies that reflect the values of the community while meeting the modeling targets of the regional growth strategy; however, flexibility in application of the model should be a key principle in developing a hybrid model adaptable to actual growth patterns.

As endorsed by the Snohomish County Tomorrow Steering Committee, inherit flexibility including consideration of logical UGA boundary expansions that recognize changing population distribution, service areas and natural boundaries should remain options to achieve regional growth targets.

Thank you again for the opportunity to comment on the Draft SEIS.

Sincerely,

John Spencer, Mayor

CC:

Lake Stevens City Council

Russ Wright, Community Development Director

[Commenter\(s\):](#)

City of Lake Stevens, John Spencer

[City of Lakewood](#)

[Communication ID: 353736](#)

[04/16/2019](#)

April 15, 2019

VISION 2050 SEIS Comment

Puget Sound Regional Council

1011 Western Avenue, Suite 500

Seattle, WA 98104

VISION2050SEIS@psrc.org

To Whom It May Concern:

These comments are in regard to the Supplemental Environmental Impact Statement (SEIS) for VISION 2050 (V2050.) Thank you for your consideration.

As a starting point, it is worthwhile to highlight excerpts from the PSRC 1993 Interlocal Agreement and 2009 Bylaws, both of which make clear that PSRC is intended to do work based on local governments' Comprehensive Plans; it is a "bottom up", not a "top down", entity.

PSRC's 1993 Interlocal Agreement Mission Statement:

Preserve and enhance the quality of life in the central Puget Sound area. In so doing, it shall prepare, adopt, and maintain goals, policy (sic), and standards for regional transportation and regional growth management in the central Puget Sound area, in accordance with federal and state law and based on local comprehensive plans of jurisdictions within the region. The agency shall ensure implementation in the region of the provisions of state and federal law which pertain to regional transportation planning and regional growth management.

PSRC's 2009 Bylaws Purpose Statement:

[E]xercise the authority delegated to it pursuant to the Interlocal Agreement and under federal and state laws as the Metropolitan Planning Organization and Regional Transportation Planning Organization for the central Puget Sound region, and to qualify eligible agencies for programming of federal, state and local transportation projects identified in the Transportation Improvement Program.

Major Military Installations in V2050

Lakewood supports the addition of Major Military Installations as a regional geography

to V2050. The influences of the presence of Joint Base Lewis McChord (JBLM), Naval Base Kitsap – Bangor, Naval Base Kitsap – Bremerton, and Naval Station Everett cannot be ignored nor underestimated. Lakewood also seconds the statement at page 83 of the SEIS, namely, "Military installations are not subject to planning requirements under

GMA or VISION 2040, although Joint Land Use studies have been prepared for some installations in cooperation with surrounding jurisdictions."

Infrastructure Planning

Fifteen cities have incorporated in Washington State since 1990, including Lakewood,

Edgewood, University Place, Burien, Covington, Federal Way, Kenmore, Maple Valley, Newcastle, Sammamish, SeaTac, Shoreline, and Woodinville within Pierce, King, Kitsap and Snohomish Counties. In most cases, a major reason for incorporation is the lack of organized infrastructure development and service provision over time. These new cities may not own some or all of their utilities or public service providers.

Regardless of their incorporation dates, it is important that PSRC acknowledge the fundamental difference in planning and funding for jurisdictions that do versus those that do not own their utilities and public services (water, stormwater, sanitary sewer, electricity, fire service, police service, etc.) Cities that do not own such utilities and services operate very differently from those who do, and have

less ability to plan for long-term development and redevelopment. Policies that do not take this fact into account are bound to be difficult or even impossible to implement.

SEIS Comments

Comments are included below regarding the three proposed regional growth alternatives and mitigations therefor.

Section 3.3 Transit Focused Growth Alternative, page 88

In Section 3.3, the “Transit Focused Growth” alternative has an explicit goal for 75 percent of the region’s population and employment growth to occur within regional growth centers and within a quarter-mile to a half-mile from current and planned investments in high-capacity transit [HCT], including light rail, bus rapid transit, commuter rail, ferries, and streetcar.

Comment: This “explicit” goal is unlikely. Existing literature strongly suggests that under the most ideal situations, the highest percentage to be reached is 62 percent. If the best situation is 62 percent, then this alternative is overstating its level of effectiveness and many of the underlying premises need to be re-evaluated¹.

Living near transit does not increase the use of non-car modes for work commutes. Workplace proximity to transit is more influential upon commute and personal trip mode. Locating jobs nearer to transit would be more effective in promoting more non-car usage.

Section 3.4 Regional Growth Alternatives Comparison, page 92

Table 3.5-1 provides a summary of the three regional growth alternatives.

Comment: Each alternatives’ population percentages do not show significant difference from one to another. Further, the population distributions need reexamination if they are based on an

¹ See Cervero, Robert. (1994). Transit-based Housing in California: Evidence on Ridership Impacts, & Transportation Research Part A: Policy & Practice, Volume 80, October 2015, Pages 277-287.

assumed (and incorrect) 75 percent growth concentrated in HCT communities.

Presumably, the PSRC Growth Management Policy Board (GMPB) and ultimately the Executive Board and General Assembly will consider approving a regional growth alternative that is not precisely one of the three presented in the SEIS, but rather a hybrid or edited alternative. Lakewood offers the following two options for consideration by the GMPB:

“Slow Growth Alternative”: This alternative would restrict growth unless and until transportation and infrastructure concurrency issues are resolved. Many areas of the Central Puget Sound have inadequate water, sewer, and stormwater facilities for their current housing and employment, let alone that anticipated in any of the V2050 growth scenarios; looking

into the future, the inadequacies (systems that are old and/or too small) will just increase. Anticipated changes in technologies will increase the load on the electrical grid (e.g., charging an electric bus is roughly equivalent to adding 40 homes to the grid), and little or no planning by regional and local

entities to prepare for the increased load. This alternative would take a practical approach to preventing the worsening of infrastructure overload.

“Economic Dispersion Alternative”: This alternative would incorporate and expand on the policies and priorities that focus on a better dispersion of job growth throughout the PSRC region included in the September, 2017 Regional Economic Strategy, “Amazing Place.” As stated in the Strategy:

Amazing Place places new emphasis on opening access to opportunity within all parts of the region, for everyone in the region. A new rural strategy and supporting initiatives are identified. Amazing Place includes new strategies and initiatives to grow new jobs closer to housing. Housing supply has been trailing job growth throughout the region. Amazing Place includes new strategies and initiatives to address housing costs, and sustain the region’s competitive edge.

Of particular importance are the following strategies:

Encourage economic growth across all parts of the region — Sub-regional areas contribute unique strengths and characteristics to the region’s collective economy, supported by efforts to grow jobs throughout all areas. The region has seen strong economic growth, but it is not equally distributed throughout the region. Sub-regions have distinct opportunities and challenges requiring different investments and economic development efforts.

Advance economic development within small cities and rural communities — Small cities and rural communities are hubs for small business growth and emerging industry development and are scenic gateways to the region’s abundant recreational activities.

Initiatives supported by the regional economic strategy will:

Work with jurisdictions with centers to accept anticipated proportional growth and development and continue to support local comprehensive plans that support centers

Support jobs and housing growth in urban areas, regional centers, and cities with investments in infrastructure

Concentrate industrial business activity within Manufacturing and Industrial Centers regionwide and appropriate industrially zoned areas

Encourage land use and transportation plans to support job retention and creation and economic development in all communities

Out of all PSRC jurisdictions and geographic areas, King County has seen the vast majority of economic and job growth in recent years, but slow housing growth by comparison. Other counties’ data demonstrate the opposite trend:

[Chart]

Source: PSRC Population & Total Employment Estimates

[Chart]

Source: U.S. Census –Inflow/Outflow Analysis (2015)

[Chart]

Source: U.S. Census -ACS 5 Year Estimates

These trends cannot continue. Jobs must be disbursed throughout the Central Puget Sound in order to achieve a myriad of desired outcomes, including but not limited to:

alleviating transportation pressure;

improving housing affordability near the workplace;

improving the region's economic resiliency following natural disaster;

improving air quality via less transportation congestion; and

ensuring long term financial viability of all counties and all local jurisdictions.

Again, Lakewood submits the "Slow Growth" and "Economic Dispersion" alternatives for consideration by the GMPB as a final regional growth alternative is selected.

V2050 MITIGATION MEASURES

A number of the mitigation measures in V2050's SEIS include content already addressed in

Pierce County's Countywide Planning Policies (CPPs) as well as city policies and regulations; they may be included in other counties' CPPs as well. First, SEIS mitigation measures should not be existing policies/actions for the new proposed outcomes of V2050; new mitigation measures should be proposed for the considered future growth alternatives. Second, there is no need (nor authority) for PSRC to impose a "top down" policy scheme when per its mission, PSRC is intended and authorized to base its work on local Comprehensive Plans. Third, by identifying preexisting CPPs as mitigation measure for various V2050 issues, is the SEIS demonstrating a bias and assumption that "Stay the Course" will be the selected regional growth alternative?

Section 4.1.3 Potential Mitigation Measures: Housing and Employment (Page 105 et seq.)

Housing

Mitigation measure: Encourage planning practices to analyze and track housing issues and needs.

Comment: The proposed mitigation measure is overly broad. What kind of specific planning practices are being suggested?

2. Mitigation measure: Pursue design guidelines and design approaches for small-lot development, zero lot line development, and reduced setback requirements.

Comment: The proposed mitigation measure is already in place locally at Pierce County CPPs

AH-5, 5.2, 5.4, 5.4.1, 5.4.2, and 5.4.3.

3. Mitigation measure: Encourage regulatory approaches such as zoning changes, minimum density ordinances, performance zoning, and inclusionary zoning.

Comment: The Pierce County housing market, as well as those elsewhere, have not supported minimum density ordinances. While many cities do allow higher densities, as much as 100-units per acre, there has been an unwillingness to build such projects unless there is the Smart Growth infrastructure in place needed to support the higher density. This infrastructure is missing in most suburban communities, and, thus, lower densities continue to be the reality.

Lakewood prefers and uses non-mandatory inclusionary zoning practices, including its Multi-Family Housing Tax Exemption program, codified at LMC Chapter 3.64, and its Housing Incentives Programs, including density bonuses, development standard modifications, and fee reductions that are codified at LMC 18A.50.700 et seq.

Inclusionary zoning is itself sometimes a barrier to community support for dense development, particularly in well-to-do neighborhoods. Inclusionary zoning costs government money due to administration and enforcement of the program. There is one exception that has demonstrated results - when inclusionary zoning is voluntary and accompanied by density bonuses. This city's general fund is already significantly burdened, and there is no desire to add on new mandates unless PSRC wishes to fully subsidize such programs.

4. Mitigation measure: Provide financial incentives such as fee exemptions, density bonuses, tax credits, or transfer of development rights programs.

Comment: PSRC should examine the land use regulations of existing cities before proposing this mitigation. PSRC may be surprised to learn that many of these items are already in place. For example, please see Lakewood Municipal Code 18A.50.700, et seq., and Chapter 3.64. Lakewood already provides fee reductions, density bonuses, voluntary inclusionary housing, development standards modifications, and multifamily tax reductions.

5. Mitigation measure: Develop consistent definitions for "affordable," "low-income," and "moderate-income" among jurisdictions.

Comment: The proposed mitigation measure is already in place locally at Pierce County CPPs AH-3, 3.1, 3.1.1, 3.1.2, 3.1.3, and 3.1.4.

6. Mitigation measure: Encourage the adoption of affordable housing targets by local jurisdictions.

7. Mitigation measure: Establish housing targets specific to identified regional growth centers.

Comment on measures 6 and 7: There is a problem with the use of the word "encourage" in measure 6 and discussion of housing targets in both measure 6 and 7. "Encourage" suggests that the establishment of housing targets is permissive. What happens when some cities and counties adopt targets and others do not? Would PSRC approve transportation grant awards for those cities and counties that did adopt targets and deny transportation grant awards for those cities and counties that did not? IF there are going to be affordable housing targets incorporated into V2050, then all cities and counties must comply.

However, state government and local partnerships - not PSRC - should be setting housing targets based on infrastructure capacity and then helping local governments to meet these targets and improve infrastructure in areas where housing units increase.

8. Mitigation measure: Perform regular review and updates to local land use regulations to ensure consistency with affordable housing goals.

Comment: The proposed mitigation measure is already in place locally at Pierce County CPPs AH-8 and related sub-categories. Local land use regulation already goes through periodic review as required by both the Washington Department of Commerce and PSRC.

9. Mitigation measure: Prioritize regional funding for transportation projects that support affordable housing.

Comment: Is this proposed mitigation measure specific to the Transit Focused Alternative, or to any transportation project that supports affordable housing?

10. Mitigation measure: Rezone for increased density near transit and services.

Comment: PSRC staff is directed to review the land use regulations for those areas designated Regional Growth Centers that have existing transit service in place. It is very likely that these Centers have already rezoned for increased density. This measure, therefore, seems moot.

11. Mitigation measure: Increase housing supply with access to employment. Comment: This proposed mitigation measure is overly broad. How does PSRC propose

implementation? Is implementation based on market conditions, or is it to be based on governmental policy? This has been a problem in many urban communities and solutions have been hard to identify.

The proposed mitigation measure is already in place locally at Pierce County CPPs AH-3 subcategory 3.3, AH-4, and AH-6. The policies exist, but current implementation is lackluster.

If the region wants increased housing supply with access to employment, local governments and NGO expert organizations need to form new partnerships or regional housing alliances. This region lacks organized leadership and vision committed to prioritizing housing, and, frankly, PSRC is not - and should not be - the driver. Moreover, large private-sector employers have shown an unwillingness to participate. Greater involvement by the private sector would occur if the housing situation became an employment constraint. To date, that has yet to occur.

12. Mitigation measure: Streamline regulations and reduce development restrictions, such as minimum parking requirements.

Comment: The proposed mitigation measure is already in place locally at Pierce County CPPs UGA-21 and related sub-categories. UGA-24, and UGA-26.

13. Mitigation measure: Increase funding available for affordable housing through federal low-income housing tax credit, local or countywide housing levy, or other similar measures.

Comment: The proposed mitigation measure is government-based, which is often asked to do too much with insufficient resources. The proposed measure should be expanded to create a

system where there is private sector participation. This private-public approach has been successful in the San Francisco Bay Area: the Partnership for the Bay Area's Future (<https://www.baysfuture.org/>) has a \$500 million investment fund dedicated to alleviating the capital constraints facing affordable housing development, and one \$40 million grant fund focused on moving forward both tenant protection policies and policies to enable more housing construction.

14. Mitigation measure: Prevent displacement and preserve "naturally occurring" affordable housing through sales tax waiver, low interest loans/revolving loan fund for preservation, and code enforcement.

Comment: What enabling legislation or administrative regulation grants PSRC the authority to address such an issue?

Also, what does PSRC mean when it references the preservation of "naturally occurring" affordable housing? That if a community has existing very low or low income neighborhoods, these must be preserved? Does PSRC not recognize that many of these neighborhoods were established by the "red-lining" (a discriminatory practice by which banks, insurance companies, etc., refuse or limit loans, mortgages, insurance, etc. within specific geographic areas) practices in years past and remain legacy issues for many communities? Is not this mitigation measure

actually exclusionary in nature because it allows jurisdictions to keep low income housing within its existing boundaries? What mitigation measures does PSRC propose to bring affordable housing into more affluent neighborhoods?

Lakewood has established a very successful rental housing safety program designed to ensure that all rental housing units comply with specific life and fire safety standards and are providing a safe place for tenants to live. All rental properties owners are required to register their property with the City every year and have the property inspected once every five years. This program is a real world, effective way to preserve affordable housing wherever it may occur within the

City's boundaries.

15. Mitigation measure: Pursue tenant protections by providing multi-jurisdiction support for local enforcement of codes and affordability, support local implementation and enforcement to prevent source of income discrimination, and create legal defense fund

for local jurisdictions.

Comment: Please see the comments for measure 14 above. Measure 15 is basically stating that if you're poor, it's okay to live in a substandard unit. Lakewood opposes this philosophy; everyone has the right to live in a decent structure. The City will use its building and fire codes, as adopted by Washington State, to enforce basic health and safety provisions. City will comply with Tenant/Landlord Law as adopted by Washington State. City opposes the creation of a legal defense fund given the success of techniques and programs such as Lakewood Rental Housing Safety program.

This mitigation measure also fails to address the increased administrative costs that these programs entail.

16. Mitigation measure: Assess, monitor, and report housing data and trends.

Comment: The proposed mitigation measure is already in place locally at Pierce County CPPs AH-8, related sub-categories.

17. Mitigation measure: Encourage wider range of affordable housing for seniors and special needs populations, and housing that accommodates a variety of family sizes.

Comment: The proposed mitigation measure is already in place locally at Pierce County CPPs AH-8, related sub-categories.

Employment

Mitigation Measure: Preserve adequate land at reasonable cost for land-intensive commercial industries.

Comment: The proposed mitigation measure is unrealistic. It seems to assume that many communities have surplus lands. For built-out communities, that is not the case and the cost of land which may be available will be dictated by the market.

2. Mitigation measure: Support established and emerging industry clusters.

Comment: The proposed mitigation measure is already in place locally at Pierce County CPPs Ec-2, sub-category 2.9.

3. Mitigation measure: Support businesses, ports, and agencies involved in trade-related activities.

Comment: The proposed mitigation measure is already in place locally at Pierce County CPPs Ec-1, sub-category 1.8.

4. Mitigation measure: Provide a supportive environment for business startups, small businesses, and locally owned businesses.

Comment: The proposed mitigation measure is already in place locally at Pierce County CPPs Ec-2, sub-category 1.12.

5. Mitigation Measure: Invest in infrastructure that connects designated centers. Comment: The proposed mitigation measure is already in place locally at Pierce County CPPs Ec-5, sub-category 5.8.

6. Mitigation Measure: Promote economic activity and employment growth that sustains diversity of family wage jobs.

Comment: The proposed mitigation measure is already in place locally at Pierce County CPPs Ec-2, sub-categories 2.1 and 2.6.

7. Mitigation Measure: Support a high-quality education system and training programs. Comment: The proposed mitigation measure is already in place locally at Pierce County CPPs education policies, beginning on page 36

8. Mitigation Measure: Support economic activity and employment in rural and natural resources areas compatible with those lands.

Comment: The proposed mitigation measure is already in place locally at Pierce County CPPs

Ec-6, subcategories 6.9 and 6.10.

Section 4.2.3 Potential Mitigation Measures (Land Use) (Page 115 et seq.)

Mitigation measure - Local jurisdictions comply with GMA to identify imbalances between growth and infrastructure needs and identify discrete actions to mitigate impacts.

Comment: This is a generalized statement and underscores the problem cities like Lakewood have with inadequate existing infrastructure, historical land use patterns, and governance issues. Sufficient capital funds are not available to establish the High Capacity Transit (HCT) community that is envisioned in this SEIS. The problem is exacerbated by the fact that Lakewood is served by special service districts providing water and sewer, and three power companies. These outside agencies have their own separate pricing structures, and they may not be aligned with current regional growth strategies nor any new policies proposed by PSRC at some future date.

Jurisdictions that incorporated after partial or full build-out and/or do not own their utilities are at a unique disadvantage when engaged in long term land use planning since they do not control how infrastructure is developed, upgraded, or maintained. This measure should be edited to recognize that.

2. Mitigation measure - Encourage “green” building practices.

Comment: The V2050 SEIS may want to recognize current state energy code requirements, which by default result in green building practices. (See Washington State Energy Code, Residential Provisions, Chapter 51-11R WAC, and the Washington State Energy Code, Commercial Provisions, Chapter 51-11C WAC.)

3. Mitigation measure - Implement centers development to accommodate growth. Comment: Centers development is being incorporated into Countywide Planning Policies.

Centers are designated in existing Comprehensive Plans. Subarea plans have been established to support Centers.

4. Mitigation measure - Promote design standards to make dense development more attractive and compatible with existing development.

Comment: The proposed mitigation measure is already in place locally at Pierce County CPPs

CU-4, HAC-4, and UGA-15

5. Mitigation Measure: Improve long-range planning for unincorporated areas.

Comment: Proposed mitigation measure is overly broad. Please provide specific information on what PSRC desires.

6. Mitigation measure: Site schools and institutions in a way that reinforces growth management objectives.

Comment: The proposed mitigation measure is already in place locally at Pierce County CPPs Ed-3, Ed-4, Ed-5, and Rur-19.

7. Mitigation measure: Promote transportation investments that serve increased population and employment.

Comment: To be clear, promoting transportation investments means fixing existing transportation deficiencies, particularly since these growth alternatives are assuming increased densities in existing jurisdictions via upzoning. A more accurate mitigation measure would be to recognize those cities and counties which have Transportation Improvement Plans (TIPs) in

place that closely match PSRC's anticipated transportation investments. Additionally, the regional transportation investment strategy should include a program to address deferred maintenance issues on the region's existing streets and highways.

8. Mitigation measure: Promote higher densities near transit and encourage transit-oriented development.

Comment: The proposed mitigation measure is already in place locally at Pierce County CPPs

11.4.1. Further Lakewood has established a transit oriented zoning district which promotes density at 54 dwelling units per acre, and undoubtedly other jurisdictions have taken similar action. Lakewood has also adopted (and PSRC has certified) a Downtown Subarea Plan that includes a transit station and plans for residential and mixed use densities of up to 100 units per acre

9. Mitigation measure: Develop center and transit-station subarea plans

Comment: Subarea plans are time consuming and expensive, often upwards of \$500,000. If PSRC wants to support the promulgation of subarea plans, then it should financially support their development and implementation. Lakewood has also adopted (and PSRC has certified) a Downtown Subarea Plan that includes a transit station and plans for residential and mixed use densities of up to 100 units per acre. Future planning efforts may include a new neighborhood or subarea plan around the Sound Transit Station.

10. Mitigation measure: Integrate environmental review and mitigation into the subarea planning process.

Comment: Integration makes the most sense through the adoption of planned action ordinances (PAOs) with subarea plans. This is a standard process that is already occurring amongst municipalities, including Lakewood's recent adoption of a PAO along with its Downtown Subarea Plan.

11. Mitigation measure: Conduct community participation and visioning exercises to help guide planning, development, and investments.

Comment: This mitigation measure states the obvious and is unnecessary. RCW 36.70A.035 requires that each Washington city and county establish a public participation program and procedures for amendments, updates, and revisions of comprehensive plans and development regulations.

12. Mitigation measure: Provide amenities such as parks, plazas, trails, waterfront access, and cultural centers in denser areas to increase livability.

Comment: There are already numerous policies within the Pierce County CPPs that address parks, plazas, etc. Please review Policy UGA-18. Many of the recently adopted subarea plans include open space provisions. Additionally, cities and counties are required to have policies which address open space in their existing parks master plans.

13. Mitigation measure: Pursue measures that increase residential capacity (e.g., permit Accessory Dwelling Units, provide multifamily housing tax credits and density bonuses

Comment: Lakewood and many other cities allow accessory dwelling units and density bonuses, have a housing tax credits program, and permit additional housing types in single-family zones.

14. Mitigation measure: Encourage infill and redevelopment.

Comment: Lakewood is a built-out community. All development is infill or redevelopment. However, as with most cities, Lakewood faces significant infrastructure deficits. The problem is made more acute since most of the City's utilities are provided through special service districts, and three separate power purveyors.

Concentrating a significant portion of this region's growth as "infill" means tough political choices, removing many existing houses and businesses, and is not popular with the public. Further, PSRC should recognize that the economy is market-based. "Infill" living does not suit all tastes (e.g., too much noise, less privacy, no back yard, bad air quality, no access to open space, etc.) The quality of schools is also critical, which is often forgotten in "infill" discussions. If the schools are poor, families will not locate to an area.

This proposed mitigation measure is lacking. More astute mitigation measures related to infill would: preserve local flexibility and community input;

direct the state to provide incentives and priority for infill development;

develop new resources and financing tools to fund transit, affordable housing, brownfield clean up and infill related planning;

develop major dedicated, stable funding sources to support infrastructure expansion and repair water, sewer, roads, rail line, bridges, seismic, bike paths, and urban parks;

refrain from imposing additional mandates on local agencies;

match state school funding and policies with infill objectives;

work with schools to encourage participation in local planning, co-location of facilities

and review of facility and site requirements; and

ensure cities have the resources to solve their infill challenges.

15. Mitigation measure: Develop or strengthen brownfields programs.

Comment: Existing brownfields have been identified by many jurisdictions; however, there are insufficient funds at both the local and the state level to address remediation.

16. Mitigation measure: Apply development standards that limit and mitigate car-dependent land uses.

Comment: Some governmental actions have been established to address this concern. However, this mitigation measure is generally in conflict with current market conditions and stands little chance of success.

17. Mitigation measure: Incorporate design standards that enhance walkability and character.

Comment: The proposed mitigation measure is already in place locally at Pierce County CPPs

CU-1; HW-1; HW-4; Env-11; 7.2; UGA-13; UGA-20;

18. Mitigation measure: Encourage developers to reduce off-street surface parking. Comment: A reduction in off-street parking is found in Pierce County CPP UGA-21. If similar

policies already exist in other counties' CPPs, then this mitigation measure should be removed.

Mitigation measure: Use Transfer of Development Rights [TDR] programs to encourage compact and clustered development.

Comment: TDRs programs work when they designate locally appropriate receiving areas and offer development bonuses that developers actually want and need. In addition, successful TDR programs require at least one of the following three characteristics: strict sending-area regulations, market incentives, and/or few ways for development to gain bonus density without using TDR. TDRs take time, and require extensive city resources. They are not always an effective means to address compact development.

Mitigation measure: Promote programs such as farmers markets to increase consumption of locally grown products.

Comment: Lakewood and many cities already have farmers markets in place. As a result, there is increasing competition between these markets, and not enough farmers or customers to participate in all of them.

Mitigation measure: Provide for programs to acquire designated critical areas as public lands.

Comment: The proposed mitigation is overly broad; however as a point of reference, Lakewood has protected critical areas by a number of means, including creating partnerships with other agencies, outright land acquisition, and zoning state properties and flood prone areas as open space. This works best when local agencies have flexibility.

Section 4.3.3 Potential Mitigation Measures: (Transportation) (Page 123)

Mitigation measure: Encourage jurisdictions to integrate technology-based mobility options (including connected and autonomous vehicles) into existing transportation systems and plans.

Comment: If adopted, this measure assumes a significant change in the way in which transportation systems would be funded in the future. Existing transportation revenue sources are declining and

expected to continue to decline. This measure would encourage usage-based charging, car sharing systems, trip-based or per-use fees, and monetizing mobility data; these options fly in the face of public disclosure and raise concerns with privacy.

Mitigation measure: Promote land use development patterns—such as transit-oriented development—that shift trips from driving alone to transit, walking, or biking.

Comment: Lakewood and other jurisdictions have multiple goals and policies in place already supporting this proposed mitigation measure; it seems to be unnecessary “top down” planning.

Mitigation measure: Where the street grid is not connected, add non-motorized connections where possible.

Comment: Funding for these types of improvements is reliant on the availability of transportation grant funding. Since its incorporation in 1996, Lakewood has been pursuing the establishment of non-motorized connections; as a jurisdiction that incorporated long after development occurred, the city is significantly deficient in this area.

Section 4.4.3 Potential Mitigation Measures: Air Quality (Page 126 et seq.)

Mitigation measure: Encourage local jurisdictions to develop greenhouse gas reduction targets, programs, and policies.

Comment: Lakewood does not own its water, sewer, and power facilities or utilities. It also contracts for waste disposal. As a result, its ability to implement this type of a measure is significantly limited. Other jurisdictions with similar infrastructure ownership schemes suffer the same challenges.

Programs the City current offers: support farmer’s markets; support for community gardens and home gardens; water-efficient landscaping requirements for new development; transportation demand management policies and codes; investment into code enforcement; new lighting study; replacement of street lights with energy-saving devices; complete streets policies; safe routes to schools; coordinated land use and transit planning; tree protection on private property; and the planting of trees on public properties.

Mitigation measure: Consider proximity to sensitive populations (children, elderly) in siting development and transportation infrastructure.

Comment: The proposed mitigation measure seems unnecessary and a review of comprehensive plans throughout the region would likely reveal jurisdictions already have such mitigation measures in place. For example, Lakewood has a significant number of existing goals and policies: Goal LU-45, and related policies; Goal LU-52 and related policies; Goal LU-53 and related policies; Policy PS-1.3; PS-10.6; Goal PS-20 and related policies.

Section 4.5.3 Potential Mitigation Measures: Ecosystems (Page 132)

Mitigation measure: Implement the Regional Open Space Conservation Plan (ROSCP) (PSRC 2018j) at the local level.

Comment: According to the existing plan, the primary ownership of open space is found under federal (51 percent), and state ownership (23 percent). Per the 2018 ROSCP, about 70 percent of the regional open space network has long-term protection through public ownership and conservation easements. The regional open space network covers about 3.03 million acres of public and private land and 339 miles of trail. Approximately 2.13 million acres of open space in the region are owned outright by public, tribal, or conservation organizations. The federal government is the largest open space owner in the region; approximately 1.16 million acres of regional open space are held by several different U.S. departments and agencies. Habitat and natural areas are also protected by military installations that occur throughout the region. Washington state owns and manages approximately 356,000 acres of open space in the region, including 24 state parks. County-owned open space in the region covers approximately 69,700 acres.

Rather than focus on the cities, where ownership of open space is quite small, a better approach would be for PSRC to focus its attention on federal and county land acquisition and preservation efforts. Farmland, forest lands, and resource lands are rural land uses regardless of ownership.

Mitigation measure: Encourage use of drainage systems that mimic natural systems (e.g., vegetated swales and rain gardens).

Comment: These types of drainage systems are generally unnecessary in Lakewood and others with similar soils. The soils are such that water seeps into the existing groundwater tables without the artificially-created systems described in the proposed mitigation measure. The measure could be edits to state "Where needed, encourage use of . . ."

Mitigation measure: Locate, design, and maintain stormwater management facilities to maximize benefits to pond-breeding amphibians (Wind 2015).

Comment: This measure is vague and its implementation costs and requirements are unclear. Is the intent to have amphibians living in artificial ponds? To have stormwater fed into naturally occurring ponds? To change infrastructure planning and funding allocations to accommodate this measure? Its effects could well outweigh its benefits and Lakewood is opposed to it.

Mitigation measure: Promote the preservation of on-site native vegetation, particularly mature trees.

Comment: Local jurisdictions existing regulations already in place (e.g. Lakewood's LMC Chapters 18A.30, 18A.40 and 18A.50) that perform this function and make this mitigation measure moot.

4.6.3 Potential Mitigation Measures: Water (Page 137)

Mitigation measure: Control land use in areas susceptible to groundwater contamination. Comment: The proposed mitigation measure is unnecessary. The 1996 amendments to the

federal Safe Drinking Water Act require states to implement Source Water Assessment

Programs. The state Department of Health Office of Drinking Water (ODW) has been assigned primacy for the federal drinking water program in Washington. This office is responsible for implementing requirements. Under existing state rules (WAC 246-290-135) Washington's federally regulated public water systems (Group A systems) already are conducting wellhead protection programs and/or

watershed control programs. All “ground-water-using” systems also are required to submit a susceptibility assessment to ODW as part of their wellhead protection program.

Mitigation measure: Consider green development standards.

Comments: Green building standards are currently found in the International Construction Code and Energy Code as adopted by the state of Washington that exceed green building requirements and voluntary efforts throughout much of the country. Examples include energy conservation, use of water saving fixtures, and dedicated outdoor air systems. The requirement to utilize low impact development “wherever feasible” is also in place per NPDES regulations and WA PCHB decisions (e.g., Pierce County v. Ecology; City of Tacoma and City of Seattle, Intervenor, Case No. P12-093c.) The City is not opposed to green development standards so long as they are practical and do not inordinately increase construction costs.

Mitigation measure: Reduce need for additional or expanded roadways.

Comment: Having incorporated decades after development began in its area, Lakewood is deficient in basic infrastructure, including roadways. In some situations, new roadways are needed to meet public health and safety requirements. Many existing roadways lack curb, gutter, and sidewalk, or are deficient in right-of-way space. The City is opposed to this proposed mitigation if it means that it is precluded from making improvements for the reasons stated above.

Mitigation measure: Retrofit (with updated stormwater controls) areas and transportation facilities not likely to be redeveloped in the near term.

Comment: The proposed mitigation measure is unnecessary. This type of work is already underway throughout PSRC’s region as part of an existing NPDES permit administered by the Washington State Department of Ecology. Many cities, counties and state agencies have been retrofitting existing facilities for many years.

Section 4.7.3 Potential Mitigation Measures: Public Services and Utilities (Page 140 et seq.)

General

Consider developing best management practices and model policies for cities and counties to easily adopt.

Comment: These policies would be irrelevant to certain jurisdictions, including Lakewood, unless they address issues for cities that do not own their utilities. Any BMPs or model language should anticipate such issues.

Water, Sanitary Sewer, Stormwater

Improve urban water management and install permeable pavement, drought-tolerant landscaping, and water-efficient fixtures

Encourage green infrastructure: design rooftops to capture rainwater, install rain gardens

Comment for measures 1 and 2 above: Green building standards are currently found in the International Construction Code and Energy Code as adopted by the state of Washington that exceed green building requirements and voluntary efforts throughout much of the

country. Examples include energy conservation, use of water saving fixtures, and dedicated outdoor air systems. The requirement to utilize low impact development “wherever feasible” is also in place per NPDES regulations and WA PCHB decisions (e.g., Pierce County v. Ecology; City of Tacoma and City of Seattle, Intervenor, Case No. P12-093c.) The City is not opposed to green development standards so long as they are practical and do not inordinately increase construction costs.

Pierce County CPPs already address green building practices at Env-31.3.1.

Other Services

Encourage proactive collaboration between cities, counties, school districts, and other special service districts to understand capacity needs and support development sites for new schools and other facilities

Comment: Regardless of whether PSRC is involved in or encouraging interagency communications, local governments have long engaged in communications with special districts and school districts. This measure is unnecessary and an overreaction to a single event (the placement of a high school in the rural area following state authorization to do so.)

Section 4.8.3 Potential Mitigation Measures: Parks and Recreation Resources (Page 145)

Implement the Regional Open Space Conservation Plan, including the following:

Incorporate open space conservation into all levels of planning

Protect remaining key habitat areas

Support urban open space and increase access to nearby open space for urban residents

Build a regional trail network

Enhance stewardship on open space lands

Restore habitat in high-value areas

Coordinate planning among and within agencies, jurisdictions, Tribes, and organizations

Engage the community to ensure that new and upgraded facilities meet their needs

Build multi-benefit green infrastructure, such as stormwater parks and river trails

Comment: This measure is a mandate and includes items with significant financial costs. Unless PSRC is able to provide funding to jurisdictions for implementation, this measure should be removed or made voluntary.

Lakewood (as well as many other PSRC cities) have Parks Plans that include locally determined and citizen supported park and open space priorities that take precedence over the ROSCP. (See, e.g., the

2014 Lakewood Parks Legacy Plan, which was developed as the Lakewood Parks, Recreation and Community Services Department worked closely with a 17-member Legacy

Team to develop a 20-year strategic plan to meet the future park and recreation needs of the community. The diverse team represented many different needs and interests of the City's residents.)

Section 4.9.3 Potential Mitigation Measures: Environmental Health (Page 148)

Human Health

Encourage jurisdictions to perform a community health impact assessment (PSRC 2014b)

Comment: The Tacoma Pierce County Health Department collaborated with the County and its cities to develop a countywide health assessment in 2013. Rather than having individual jurisdictions engage in duplicative and repetitive efforts, a better mitigation measure would encourage counties to continue updating their countywide assessments with cooperation from cities. Whether at the county or city level, however, this assessment requires funding that should be identified and secured prior to any jurisdiction being expected to conduct it.

Support implementation of the Regional Open Space Conservation Plan and develop or preserve green infrastructure, parks, and open spaces in urban areas (see Section 4.8 for additional information)

Comment: Please see the comment for Section 4.8.3 mitigation measure above.

Section 4.10.3 Potential Mitigation Measures: Energy (Page 151)

Promote green building practices for residential, commercial, and infrastructure development

Comments: Green building standards are currently found in the International Construction Code and Energy Code as adopted by the state of Washington that exceed both green building requirements and voluntary efforts throughout much of the country. Examples include energy conservation, use of water saving fixtures, and dedicated outdoor air systems. The requirement

to utilize low impact development "wherever feasible" is also in place per NPDES regulations

and WA PCHB decisions (e.g., Pierce County v. Ecology; City of Tacoma and City of Seattle, Intervenor, Case No. P12-093c.) The City is not opposed to green development standards so long as they are practical and do not inordinately increase construction costs.

Pierce County CPPs already discuss green building practices at Env-31.3.1.

Conclusion

As mentioned at the start of this letter, both the PSRC 1993 Interlocal Agreement and 2009

Bylaws make clear that PSRC is intended be a "bottom up," not a "top down," entity. Unfortunately, whether they are existing mitigation measures from VISION 2040 or proposed new measures for VISION 2050, many measures in the SEIS demonstrate a "top down" mentality and Lakewood opposes them as outside the authority of- and intent for - PSRC.

Thank you for the opportunity to provide comment on the SEIS for VISION 2050.

Sincerely,

Don Anderson, Mayor

Cc:

Deputy Mayor Jason Whalen

Councilmember Marie Barth

Councilmember Mike Brandstetter

Councilmember Paul Bocchi

Councilmember Mary Moss

Councilmember John Simpson

[Commenter\(s\):](#)

City of Lakewood, Don Anderson

[City of Lynnwood](#)

[Communication ID: 354848](#)

[04/29/2019](#)

April 29, 2019

Erika Harris, AICP

Senior Planner, SEPA Responsible Official, SEIS Project Manager

Puget Sound Regional Council

1011 Western Avenue, Suite 500

Seattle, WA 98104-1035

RE: City of Lynnwood – VISION 2050 DRAFT SEIS Comments

Dear Ms. Harris:

The City of Lynnwood very much appreciates the opportunity to comment on the Draft Supplemental Impact Statement (DSEIS) for VISION 2050. The City of Lynnwood has been a partner with Puget Sound Regional Council (PSRC) for many years and is glad to continue this relationship to plan for future growth within South County and around our region. As one of two Core cities within Snohomish County, and with the pending construction and anticipated opening of Sound Transit's Lynnwood Link Extension, Lynnwood anticipates significant population and employment growth in the next 30-year planning period.

Preferred Alternative – Transit Focused Growth

The City of Lynnwood definitively supports the Transit Focused Growth alternative¹ as the preferred alternative to be evaluated in the Final SEIS for the VISION 2050

Plan. This alternative is the most consistent with the City's goals and policies as supported in the Comprehensive Plan, as well as other supportive sub-area plans

and goals. As the preferred alternative, this will allow Lynnwood to continue to support new and re-development to occur within our Regional Growth Center and City Center areas, as well as within high-capacity transit areas (Community Transit (CT) SWIFT stations) along Highway 99. Lynnwood's vision of directing growth in

these areas, creating a more walkable, urban center and protecting existing single-family neighborhoods, is well-rooted and would allow the City's development pattern to continue as has been planned for the last two decades.

1 Transit Focused Growth alternative – One of three recommended growth alternatives as defined in PSRC, which assumes compact growth pattern with accelerated growth near existing and planned high capacity transit investments, including light-rail, bus rapid transit, commuter rail, and ferry terminals. Largest share of growth would be focused to Metro Cities (Everett), Core Cities (Lynnwood, Bothell) and High-Capacity Transit (HCT) Communities.

Support of affordable and 'missing middle' housing

City of Lynnwood staff has analyzed all three alternatives and have noted that there will be limited allowance of moderate-density housing options. The supported Transit Focused Growth Alternative would potentially provide the opportunity of moderate density housing in some capacity.

Lynnwood plans allow for moderate-density housing in the range of 12-20 dwelling units per acre, while high-density allows for 20-43 units per acre. Most of the zoning within close proximity of the City's transit facilities, as identified above, allow for higher-density units. Moderate-density units, also known as 'missing middle' housing (duplexes, triplexes, fourplexes, townhomes, condominiums) allow for individuals to live in more affordable options of housing. The DSEIS should further analyze moderate-density housing and determine whether increased allowances for the Transit Focused Growth alternative should be considered, especially for Core cities such as Lynnwood. Lynnwood would also support local flexibility to allow for more moderate-density housing within identified targeted areas.

Jobs/Housing Balance

The City of Lynnwood supports the employment re-allocation of 5% of King County's employment growth to outlying counties, including 2% to Snohomish County. This action benefits Lynnwood's Regional Growth Center and encourages employment to be dispersed closer to populated areas. This re-allocation is also supported by the bus rapid transit system developed by Community Transit, including the Orange Line that serves Lynnwood's Regional Growth Center and City Center areas.

Expansion of Urban Growth Areas (UGAs)

The City recognizes the County's desire to annex urban unincorporated lands within Snohomish County, as there are benefits to providing urban services. Lynnwood supports future annexations within existing designated UGAs but recommends the Final SEIS discuss whether expansion of existing UGAs (i.e. northward toward Mukilteo) should be considered, recognizing the growth pattern of the Transit Focused Growth Alternative, in particular Core Cities such as Lynnwood.

Unincorporated Urban Lands and HCT Communities

Lynnwood recognizes that Snohomish County is considering a shift of population from HCT communities to urban unincorporated and rural areas under the Transit Focused Growth alternative. This decision could affect areas within Lynnwood's Municipal Urban Growth Area (MUGA). Before this is considered, City of Lynnwood requests that the Final SEIS analyze impacts of additional growth in the urban incorporated areas on adjacent cities as well as impacts for future growth capacity if/when these areas are annexed within the City of Lynnwood.

Growth in relation to HCT service

As previously noted, the Transit Focused Growth alternative focuses on compact and accelerated growth nearest to existing and planned high capacity transit investments. The City will experience significant development growth adjacent to and near (within 0.5 mile) of the Lynnwood Transit Center/Future Lynnwood Link Extension Station within the next 5-15 years. Future growth will also likely occur in the Regional Growth Center, especially along the bus rapid transit line (CT Orange Line). However, additional long-term growth may not be anticipated beyond 15 years until future light rail stations are developed, specifically West Alderwood and Ash Way (Lynnwood MUGA). Lynnwood supports a Final SEIS analysis that establishes a range of intermediate growth allocations that would allow jurisdictions to monitor growth relative to operation of future high-capacity transit services, as noted above.

In closing, Lynnwood will continue to be a regional leader in the Puget Sound and in South County, and fully supports PSRC in developing VISION 2050 and working toward final adoption of the Plan. The City of Lynnwood thanks you for the opportunity to comment on a preferred alternative. Please contact Todd Hall, Planning Manager if you wish to follow-up on this letter.

Sincerely,

Nicola Smith, Mayor

CC: City Council

Art Ceniza, Asst. City Administrator

David Kleitsch, Economic Development Director/Interim Community Development Director

Todd Hall, Planning Manager

[Commenter\(s\):](#)

City of Lynnwood, Todd Hall, Nicola Smith

City of Marysville

Communication ID: 354844

04/29/2019

April 29, 2019

Ericka Harris, AICP

Senior Planner, SEPA Responsible Official

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SUBJECT: City of Marysville- Comments on the Draft SEIS for VISION 2050

Dear Ms. Harris

Thank you for the opportunity to comment on the Draft SEIS for VISION 2050.

Arlington Marysville Manufacturing Industrial Center

The City of Marysville is excited about the Arlington Marysville Manufacturing Industrial Center regional Industrial Growth Center designation moving through the process with action scheduled for June 27, 2019 by the Executive Committee. The cities of Arlington and Marysville have been working together for several years to achieve this recognition and now that it is scheduled for action it is great that this Manufacturing Industrial Center designation can be a part of VISION 2050 plan. We ask that as a part of the VISION 2050 plan that the Arlington Marysville Manufacturing Industrial Center regional Industrial Growth Center designation be shown and that it be described how this Manufacturing Industrial Center will benefit Snohomish County and the Region along with the other regionally recognized Manufacturing Industrial Centers. It is very important for the entire region that all the Manufacturing Industrial Centers are successful.

High Capacity Transit

As a proposed High Capacity Transit Community, we look forward to Community Transit's expansion of its bus rapid transit system into Marysville which will serve the community on a north south route including serving the Manufacturing Industrial Center. This will be an important link to the regional transit system to the south in Everett. We support this planned expansion of service to serve jobs and housing and think an analysis of the benefit of this new route to north Snohomish County is important.

Improve Jobs and Housing Balance

Marysville is supportive of the employment reallocation of King County's employment growth to outlying counties, including to Snohomish County. Something greater than the proposed 5% from King County and 2% to Snohomish County should be considered. This action would benefit the Arlington Marysville Manufacturing Industrial Center and reinforce the opportunity for employees to be able to

take advantage of the lower cost of housing in Marysville and the surrounding communities. Hopefully this will reduce the travel demand to King County and can be reviewed as a part of the final EIS.

Population Growth Targets

Population growth targets need to have some flexibility into the future as the market determines where growth will occur over time. As the HCT Communities population allocations are developed in the Countywide Planning efforts, it would be good for an understanding to exist that there is the need to consider that aspirational goals are affected by many factors which are beyond the control of local government. There is also the need for infrastructure improvements to support growth along with the land being available for development.

Sincerely

Jon Nehring

Mayor City of Marysville

CC: Marysville City Council

Gloria Hirashima, CAO

Dave Koenig, Community Development Director

Barb Mock, Director, Snohomish County Planning and Development Services

Commenter(s):

City of Marysville, Jon Nehring

City of Mercer Island

Communication ID: 354756

04/29/2019

April 29, 2019

Puget Sound Regional Council

Paul Inghram, AICP, Director of Growth Management

Erika Harris, Senior Planner

RE: Comment on Vision 2050 Draft Supplemental EIS

Dear Mr. Inghram and Ms. Harris:

Thank you for providing the Draft Supplemental Environmental Impact Statement (Draft SEIS) for VISION 2050 and the opportunity for comment. The City recognizes that the Vision 2050 planning documents will thoughtfully guide the region's management of the anticipated growth in the four counties.

In reviewing the Draft SEIS, the City has concluded that three different levels of analysis are useful to aid in evaluating anticipated environmental impacts: regional (i.e. the four counties), countywide, and local (i.e. city specific). The Draft SEIS should provide an impartial discussion of all significant environmental impacts and identify mitigation measures that would avoid or minimize adverse impacts (WAC 197-11-400). The Draft SEIS effectively evaluates the regional and county level impacts; however the Draft SEIS appears to neglect discussion of reasonably foreseeable local impacts.

In summary, the City believes that the Draft SEIS neglects to provide sufficient information, discussion, and analysis of possible mitigation related to reasonably foreseeable impacts at a local level to: A) transportation, infrastructure, and public service; and B) residential character (land use and housing).

In particular, the City of Mercer Island recommends that the Draft SEIS provide additional information, discussion, and analysis related to:

1) Analysis of transportation, infrastructure, and public service impacts

A. The Draft SEIS indicates that average daily vehicle miles per resident are projected to decrease, annual transit boardings to increase, and mode shares to shift toward non-automobile alternatives under the Transit-Focused Growth alternative, as supported by the data Appendix B. However, in order to more fully understand the potential impact to transportation systems, the City would find it helpful to see the environmental analysis amended to include projections

of absolute increases in miles driven under the alternatives. The City is concerned that an overall increase in the total number of additional vehicle trips—although projected to be shorter in length and fewer in proportion to other modes—may have a significant impact on local infrastructure and levels of service. This additional information would aid in the meaningful evaluation of the eventual preferred alternative.

B. The Draft SEIS does not sufficiently evaluate the expected impacts to the local provision of public services and utilities, together with local transportation improvements, particularly as related to the “Transit Focused Growth” and “Reset Urban Growth” alternatives. The City of Mercer Island’s Comprehensive Plan contains goals and policies that support growth, generally at the rate described in the “Stay the Course” alternative. The environmental analysis should be amended to evaluate the cost of necessary transportation and utility infrastructure and operational investments that are needed to support the population and job growth called for under each growth alternative.

Mercer Island is limited in its ability to make needed capital improvements (e.g. transportation, water, and sewer) and provide desired operational public services (e.g. fire protection, police, water, and sewer) concurrently with the population and employment growth planned under the Transit Focused Growth alternative (as an HCT Community). Mercer Island’s ability to create a connected inter- and intra-city vehicle network is limited by its rugged topography and geography as an island. Expanding water, sewer, and stormwater infrastructure is similarly difficult. Furthermore, the City’s transportation facilities and utility infrastructure contain existing deficiencies and needed improvements cannot be funded by impact fees.

The provision of operational public services (public works together with fire and police protection) is largely limited by increasing operational costs that are not matched by increasing revenues.

Mercer Island is limited in its ability to raise funds. Property tax revenue cannot keep pace with growing operational costs, and relatively small sales tax revenue due to a limited market for commercial businesses due to our location between two metropolitan cities, both with multiple commercial hubs.

A further analysis and discussion of probable significant impacts, currently unaddressed by the Draft SEIS, including reductions and/or failures to provide services at the adopted levels of service should be provided. The purpose of identifying these local jurisdiction level impacts in the Draft SEIS is to identify mitigation that might be necessary to avoid or minimize the impacts, for example, by creating a mechanism to provide additional revenue options.

2) Analysis of land use and housing impacts and residential character

The adopted City of Mercer Island Comprehensive Plan (MICP) is aligned with the Regional Growth Strategy set by Vision 2040 (PSRC Certification, December 2016). The adopted MICP Future Land Use Map also designates single-family residential zoning for most areas outside of our Town Center, equivalent to 88% of the Island's land use. The Growth Management Act (GMA) requires that the Housing Element in the MICP ensures the vitality and character of established residential neighborhoods (RCW 36.70A.070(2)). The MICP embraces this direction from the GMA and focuses on preserving existing single-family residential neighborhoods and focusing growth in the Mercer Island Town Center as a major theme in the adopted goals and policies.

Town Center zoning allows commercial, mixed-use, and multi-family residential. To accommodate the City's growth target and maintain consistency with Multi-County Planning Policies, Mercer Island opted to direct most of its allocated population and employment growth to Town Center, supporting the policy of preserving neighborhoods zoned for single-family residential development.

The Draft SEIS focuses on land use and housing impacts in the context of social equity, providing housing for all economic segments of the population, and related effects on transportation. The Draft SEIS does not provide adequate discussion, analysis, and identification of mitigation (where appropriate) related to the reasonably foreseeable changes at a local level to land use patterns and housing. The Draft SEIS does not discuss reasonably foreseeable impacts to housing patterns associated with the Transit Focused Growth alternative. For example, a shift from single-family homes towards denser residential alternatives such as townhomes or apartments may affect the existing residential character of the City; no discussion or analysis of impacts, or identification of mitigation, is provided. Similarly, a significant shift in land use patterns, as contemplated in the Transit Focused Growth alternative, may result in the new land use patterns that may affect the existing residential character of the City. Potential impacts that may be associated with a shift in housing and land use patterns include a change to the aesthetics of residential character, environmental and tree canopy coverage, and social change.

Under the Transit Focused Growth alternative, it appears that Mercer Island would be required to accommodate growth at a greater rate than it has previously. Accommodating this additional growth may require either up-zoning within Town Center or a change to the zoning designation of areas

zoned for single-family residential. Rezoning north of the Sound Transit light rail station would be contrary to our policy direction of maintaining high-quality single-family residential neighborhoods.

Up-zoning could cause significant impacts to the City's housing supply by leading to a diminished ability for residents to age in place due to displacement from redevelopment. The City would also be challenged to provide concurrent transportation facilities for the reason discussed above.

The City of Mercer Island appreciates Puget Sound Regional Council's work to develop a Regional Growth Strategy to inform and guide regional growth while ensuring potential impacts can be mitigated. Thank you again for this opportunity to comment on the Draft SEIS.

Regards,

Evan Maxim

Director of Community Planning and Development

City of Mercer Island

Copy: Mercer Island City Council

Mercer Island Planning Commission

City Manager Julie Underwood

[Commenter\(s\):](#)

City of Mercer Island, Evan Maxim

[City of Monroe](#)

[Communication ID: 354794](#)

[04/29/2019](#)

April 23, 2019

Erika Harris, AICP

Senior Planner, SEPA Responsible Official, SEIS Project Manager Puget Sound Regional Council 1011 Western Avenue, Suite 500

Seattle, WA 98104-1035

RE: City of Monroe Draft SEIS Vision 2050 Comment Letter

Dear Ms. Harris,

On behalf of the City Council and the City of Monroe, thank you for the opportunity to provide comment on the Draft Supplemental Environmental Impact Statement (DSEIS) for Vision 2050.

Since the inception of Vision 2040, the Puget Sound Region has changed dramatically with significant localized population growth, regional investment in transportation infrastructure, and expanded

employment opportunities. As the Puget Sound Regional Council (PSRC) contemplates updates under Vision 2050, it is critical that the role of cities and towns in the allocation of growth targets is not minimized. Cities and towns offer an option to maintain traditional neighborhoods that meet market preferences, provide local growth centers for focused employment supporting local job to housing balances, and supply reduced barrier I attainable housing options.

The City of Monroe, as a community, endorses the development of a hybrid approach that provides for significant growth along transit-focused areas, but also concentrates the majority of growth within municipal urban growth areas (UGAs) where existing services and infrastructure are available. Such a hybrid approach acknowledges the need for planned growth within Snohomish County, but also would account for unanticipated organic growth.

Increased growth in unincorporated areas outside of defined UGAs is ultimately at the expense of stagnating growth in cities and towns. Allocating urban levels of growth to outlying rural areas is particularly problematic, as rural areas, in general, are not characterized by urban levels of growth and typically do not have "adequate existing public facility and service capacities to serve such development," as specified in RCW 36.70A.110(3). Rather than intensifying allocations to outlying unincorporated rural areas, growth adjustments should be concentrated along the fringes of developed urban growth boundaries, or between UGA boundaries near one another to allow efficient land development and delivery of urban services.

The City supports a multifaceted approach to the distribution of growth in Snohomish County, inclusive of the following:

Encouraging growth inside city limits in areas close to High Capacity Transit, as these areas typically contain existing public facilities and service capacities to accommodate urban-level growth.

2. Encouraging annexation of existing urban growth areas around cities by removing barriers to annexation in local and state laws, and by limiting urban-level development in urban growth areas until annexations occur, except in those areas near High Capacity Transit.

3. Considering the expansion of UGAs around cities when the UGA expansion is processed concurrent to an annexation.

4. Supporting investments in transportation networks that connect cities and employment centers outside the 1-5 corridor. Monroe is situated at the nexus of U.S. Highway 2, State Route 522, and State Route 203, and growth has occurred organically as a result of its situation on this transportation network.

5. Encouraging employment centers in cities such as Monroe that are noncontiguous to other cities. In these areas, affordable land is available for employers with the added benefit of proximity to services and transportation.

For Vision 2050 to be successful, it is imperative that communities working cooperatively under countywide planning policies retain the ability to redistribute local growth targets as appropriate. As a primary pillar of the Growth Management Act, local jurisdictions need to be able to develop comprehensive plans and land use policies that reflect the values of the community while meeting the

modeling targets of the regional growth strategy; however, flexibility in application of the model should be a key principle in developing a hybrid model.

Thank you again for the opportunity to comment on the Draft Supplemental Environmental Impact Statement (DSEIS) for Vision 2050.

Sincerely,

Geoffrey Thomas, Mayor

Kevin Hanford, Councilmember

Patsy Cudaback, Councilmember [no signature]

Jim Kamp, Councilmember

Ed Davis, Councilmember

Jason Gamble, Councilmember

Jeff Rasmussen, Councilmember

Kirk Scarbero, Councilmember

Cc: Deborah Knight, City Administrator

Ben Swanson, Community Development Director

[Commenter\(s\):](#)

City of Monroe, Patsy Cudaback, Ed Davis, Jason Gamble, Kevin Hanford, Jim Kamp, Jeff Rasmussen, Kirk Scarbero, Geoffrey Thomas

City of North Bend

Communication ID: 354250

04/23/2019

April 23, 2019

Puget Sound Regional Council:

The City of North Bend appreciates the opportunity to comment on the draft VISION 2050 growth options to date. The City last commented on the scoping of the proposed Vision 2050 update on March 19, 2018.

Generally, the City does not have a favored scenario but sees a combination of the growth options to date being more realistic. At the Growth Management Policy Board meeting on May 30, 2019 comments were made by the board to ensure the selected option is realistic and grounded and that we don't exceed the targets on Day 1. There simply does not seem to be a one size fits all approach for such a diverse and growing region.

The No Action Alternative seems to be default approach and might be the more than likely outcome. The City of North Bend supports many of the opportunities and measures in the Transit Focused Growth Scenario but 75% of the region's growth within a 1/4. to 1/2 mile from current and high capacity transit station areas seems high. The average drive time per day with transit focused in only 2 minutes less than the other alternatives. No matter how we try to socially engineer where growth will occur, we can't control where people will always want to move to and where they want to live. The hardest missing piece in all of this seems to be how to plan for the individual choices of the 1.8 Million additional people who will be moving into the region. It doesn't seem reasonable to ignore the no action or the reset urban growth based on past trends.

As we stated in our previous letter consideration should be given to how the impacts of growth targets that act as precise growth assignments differ from the impacts if the targets are viewed as aspirational goals. This should definitely be discussed in the EIS. No matter which alternative is chosen the City would strongly encourage the following approaches to ensure that the City of North Bend's growth targets result in our GMA mandate to deliver urban services, and urban development densities.

- Involve city staff in transparent target-setting, so staff can ensure PSRC targets are adequately informed;
- Support a continued definition of growth targets as a minimum population target to be met for all urban growth areas, the foundational GMA requirement that applies uniformly to all the UGAOs be it a small or large City;
- Base consistency determinations on policies- such as TOO incentives in large cities targeted for higher levels of growth- rather than on one set of numeric criteria.

Thank you for considering our comments and we look forward to working with you so that targets for the City are set as a minimum and do not result in conditional certification again.

Ken Hearing, Mayor

Commenter(s):

City of North Bend, Ken Hearing

City of Port Orchard

Communication ID: 352890

04/11/2019

CITY OF PORT ORCHARD

City Council

216 Prospect Street, Port Orchard, WA 98366 [phone number, email address].

www.cityofportorchard.us

March 29, 2019

Paul Ingraham, Director of Growth Management

Puget Sound Regional Council

1011 Western Ave, Suite 500

Seattle, WA 98104-1035

Re: VISION 2050 Draft SEIS Comments

Dear Mr. Ingraham:

The Port Orchard City Council has reviewed the VISION 2050 Draft SEIS (February 2019) and its three proposed alternatives for an updated Regional Growth Strategy. The following comments are provided on behalf of the Port Orchard City Council.

Of the three Regional Growth Strategy alternatives (Stay the Course, Transit Focused Growth, Reset Urban Growth), the City prefers the Transit Focused Growth strategy. This alternative would continue VISION 2040's approach of promoting compact urban growth near the region's existing and planned high-capacity transit stations, to make the most effective use of regional investments in transportation infrastructure. The City believes that this alternative is the most supportive of the Growth Management Act's (GMA) goals of reducing sprawl, encouraging efficient multi-modal transportation systems based on regional priorities, and protecting the environment. It is also the most consistent with the Act's requirement that urban growth should be directed to urban growth areas (UGAs), and that growth outside UGAs should not be urban in nature.

According to the information provided in the SEIS, both the Stay the Course and Reset Urban Growth alternatives would direct a higher percentage of population growth into small cities and towns, unincorporated areas and rural areas than provided in VISION 2040. The Reset Urban Growth alternative, in particular, would significantly reduce the amount of moderate density housing and employment growth directed to urban areas and areas served by high-capacity transit, and would significantly increase the amount of new land being developed and the need for new and expanded local and regional infrastructure. This alternative appears largely inconsistent with the GMA and VISION 2040, and the City strongly urges that the PSRC not adopt it as the preferred alternative for VISION 2050.

If the PSRC does not move forward with the Transit Focused Growth alternative, the City requests consideration of a "hybrid" alternative that would combine aspects of both the Transit Focused Growth and Stay the Course alternatives, to continue directing growth to existing regional growth centers while giving preference to growth to regional centers with high-capacity transit to leverage the region's investments (ST3 and Kitsap Fast Ferries).

Additionally, the City requests that the PSRC consider policy language in VISION 2050 which would compel local governments that are growing in a manner inconsistent with their VISION 2040 targets to take corrective action and bring their growth back into established parameters. In particular, these policies should apply to cities and towns, and urban unincorporated areas within counties, whose growth under VISION 2040 has significantly exceeded their official population

allocations. If unchecked, this trend will continue to move growth away from metropolitan and core cities and areas with high-capacity transit, and will be counterproductive to VISION 2050's regional strategy and multi-county planning policies.

Thank you for considering the City of Port Orchard's comments on the VISION 2050 Draft SEIS. We look forward to continuing work with the PSRC on the development and implementation of VISION 2050. If the City can be of further assistance at this time, please contact me.

Sincerely,

Robert Putaansuu

Mayor

[Commenter\(s\):](#)

City of Port Orchard, Robert Putaansuu

[City of Redmond](#)

[Communication ID: 354803](#)

[04/29/2019](#)

April 29, 2019

Josh Brown, Executive Director Puget Sound Regional Council 1011 Western Ave., Suite 500 Seattle, WA 98104-1035

Subject: Draft Supplemental Environmental Impact Statement (DSEIS) on PSRC Vision 2050 (Technical Comments)

Dear Mr. Brown,

The City of Redmond's Mayor Marchione co-signed King County's comment letter on the Vision 2050 Draft Supplemental Environmental Impact Statement (DSEIS). In addition, Redmond staff have reviewed and would like to offer the enclosed technical comments on the DSEIS and potential mitigation measures.

Redmond's success in planning for growth is contingent upon a strong, supportive regional and county framework that charts an achievable course while also allowing cities the flexibility to respond to local conditions. The attached comments on the DSEIS address information gaps, assumptions, and clarifications in support of the goal to adequately mitigate potential impacts.

Please feel free to contact Judy Fani at [email address] if you have any questions.

Respectfully,

Erika Vandenbrande, Director Planning and Community Development City of Redmond

Carol Helland, Deputy Director Judy Fani, Acting Long Range Planning Manager

Enclosure: Vision 2050 DSEIS - City of Redmond Comments

[Table in letter-- reformatted for ease of coding]

Employment " Preserve adequate land at reasonable cost for land-intensive commercial industries"- include wording about light industrial and agricultural as well. One of the issues concerning redevelopment in Redmond is having enough commercial, light industrial, and agricultural land to support a healthy mix of employment sectors. This will also increase job-housing balance for non-tech jobs and tie in with wording in other sections encouraging protection of these lands.

Housing Increased opportunities for moderate density housing should also be added to this alternative. Efforts to create "missing middle" housing will provide variety and choice in housing type; in fact, "Expand housing diversity, particularly moderate-density housing" is listed as a potential mitigation measure in Table 4.1-4. Units that have features such as ground orientation or with three or more bedrooms may allow families with particular needs such as immigrant or multigenerational families, for example, greater options as this region is experiencing growth in these populations.

Land Use "Urban Land" and "Rural Land" (p. 107-8): For all growth alternatives, the DSEIS does not address issues around siting new schools to support growth as urban areas increase in density. Existing rural character could be potentially impacted if new schools that serve urban populations are sited in rural lands.

Transportation * Consider addressing the increased role that walking and bicycling will play in the function of the transportation system by providing the main form of access to high capacity transit.

The City recommends the DSEIS identify telework trends and discuss potential impacts (reference the PSRC " Driving Alone to Work Continues to Decline"). Additionally, PSRC's household travel surveys have noted an increasing trend in the number of employees who are working from home and thus using none of the travel modes noted in the DSEIS, which could suggest some of the congestion trends may be overestimated.

Consider including a discussion on future trends and impacts to the local and regional transportation network from e-commerce deliveries. The Regional Transportation Plan referenced in the DSEIS mentions e-commerce, but the discussion does not address impacts and it does not appear the modeling methodology takes into consideration e-commerce trends and resulting growth in deliveries.

Consider including a "Model Limitations" section which addresses limitations of the model and associated data inputs for each model beyond the SoundCast model.

Air Quality and Greenhouse Gas Emissions Consider addressing potential changes to Federal air quality standards and their possible effect on the region's planning.

Water Quality and Hydrology

Section 2.8 (p. 48): In addition to "sole-source aquifer" add "critical aquifer recharge area" to be more inclusive of drinking water sources. The use of critical aquifer recharge area (CARA) is consistent with Section 2.4.1 (p. 26) of the DSEIS recognizing CARAs need to be preserved under the GMA.

Section 2.8.1 (p. 48): Decreased aquifer recharge is an additional impact from increased impervious surfaces that should be addressed.

Table 2.8-1 (p. 50): Effective impervious surface should be analyzed to account for impervious surfaces that are infiltrated.

Section 4.6.1.1 (p. 133): In addition to "sole-source aquifer" add "critical aquifer recharge area" in the "Other water resources" bullet to be more inclusive of drinking water sources. The use of CARA is consistent with Section 2.4.1 (p.26) of the DSEIS recognizing CARAs need to be preserved under the GMA.

Section 4.6.1.1 (p. 134): Decreased aquifer recharge is an additional impact from increased impervious surfaces that should be addressed in the "impervious surfaces" bullet.

Tables 4.6-2 and 4.7-1 (p. 137 and 141): Caution should be used when pursuing water reuse measures in CARAs that are shallow and unconfined, such as Redmond's. The drinking water resource may be impaired if reclaimed water infiltrates into the aquifer.

Public Services and Utilities

Section 2.8.3: This section should note that cities and counties are required their NPDES permit to adopt stormwater management regulations that meet or exceed the surface water protections established by Washington Department of Ecology's Stormwater Management Manual for Western Washington. As written, this section seems to state that all jurisdictions use the Ecology manual, however that is not the case and other stormwater management manuals have been adopted by jurisdictions. Also, small cities that don't have an NPDES permit are not required to meet or exceed the regulations established by Ecology's manual.

Section 2.9.1: The stormwater bullet seems to indicate that jurisdictions are required to manage stormwater in accordance with the Ecology Manual. This item should be revised to be consistent with the above comment on Section 2.8.3.

Consider adding a discussion about the cost of utility services and ongoing asset replacement and maintenance costs under each of the three alternatives. These costs are generally less when growth is directed to compact areas.

Parks and Recreation

Table 4.8-1, "Potential Mitigation Measures for Parks and Recreation Resources"

0 "Develop level-of-service guidelines for parks and recreation facilities." The Washington Recreation and Conservation Office has guidelines and they are flexible, based on how a city believes it is best to plan (https://rco.wa.gov/documents/rec_trends/LevelofServiceReport2010.pdf). Using the acres/population model described in this DEIS is outdated and not sustainable as development occurs and there is less land available, land is more expensive, and people's use of the land changes for recreation. Some recommendations are always welcome but allowing flexibility in local jurisdictions in developing their own levels of service is important.

0 The term "recreation resources" is not defined. Consider including indoor facilities such as community centers, arts centers and pools as part of that definition.

0 Several potential mitigation measures note the need for funding. Please identify what such options might be.

0 " Incentivize private developers to provide recreation and open space with development projects." Consider clarifying and expanding to include "Public parks, trails, and indoor recreation facility space."

Reduced tree canopy is not addressed. There may also be a need to protect certain trees (individually, small wooded areas or forests) for different reasons, such as mitigation for a visual impact (some kind of development/infrastructure), to protect steep slopes, to maintain wildlife corridors, due to the age and significance of a stand of trees, etc. Some cities are adopting tree canopy goals, but a regional approach is necessary to coordinate planning, funding, and even to share resources and best practices.

The DSEIS does not appear to address changing demographics (culturally/ethnically) and the need to consider how these changes may impact park uses.

Energy

Energy use appears to be predicted as a steady state, as opposed to varying by intensity of development patterns. Consider whether this assumption accurately reflects anticipated future growth trends.

Historic, Cultural, and Archaeological Resources

Table 2.13 (p. 66): The header for this section does not account for the change to the number of historic resources as per the Washington Department of Archaeology's definition of "historic." Defined as the built environment constructed 50 or more years in the past and in the context of the region's past development patterns, many additional, existing structures meet the age criteria. This definition should be reflected in section 2.13.

Table 2.13 (p. 66): Though the narrative references the Washington Historic Register and Local Registers, this information as well as the statewide collection of cultural resources data (WISAARD) is not reflected in later figures. Figure 2.13-1 provides only the National Register and should depict the state, regional (such as King County), and local registers. It should also be noted, registers represent resources that have undergone voluntary review and nomination. The State's definition of historic, noted above, results in a significant increase in the amount of resources that would be considered for their significance in advance of their demolition, remodel, or reconstruction. Consultation with the Washington Department of Archaeology and Historic Preservation and affected Indian tribes is suggested.

Table 4.11 (p. 152): Early consideration and education regarding cultural resources can provide a proactive approach and sometimes, less costly and efficient alternative use of local planning and zoning techniques. For example, an applicant submitting a permit has likely completed geotechnical exploration and thereby, inadvertently damaged archaeological resources. An additional Mitigation Measure involving education, awareness programs, and proactive tools for the development community should be considered.

Visual quality

Table 2.14 (p. 68): The phrasing in the header for this section concludes that conditions and trends have remained the same, however, this may be inaccurate. Increases in population and corresponding development housing, employment, commercial, and services should be further examined. For example, the increases may further impact dark night skies and may not be able to maintain the views of visual resources as described in the narrative. Additional consideration including consultation with the University of Washington: College of the Environment is suggested for this section.

Table 4.12 (p. 153): Within the Potential Mitigation Measures, please consider the following changes:

- Add measure to continue/develop standards for designing sites and structures to strengthen Dark Night Sky objectives;
- Emphasize or require the preservation and planting of vegetation to provide green infrastructure in support of environmental health, visual quality, and social equity.

Earth

Consider addressing how the region's changing demographics presents challenges for community education outreach in disaster preparedness.

Noise

Consider clarifying or expanding support for the following conclusion: "At a regional level, there are no notable differences in noise impacts between alternatives."

Environmental Justice

Community Outreach efforts should include a strategy focused on engaging at existing community events not just hosting separate events.

Care should be taken to discuss the concepts in straightforward, understandable terms rather than relying on jargon

Multiple languages and multiple ways of commenting should be encouraged.

It may be important not to rely solely on the Community Partners group- especially if they are present only as stakeholders and not constituency representatives.

Consider more specific language related to preventing displacement especially since it was identified as a negative aspect of the Transit Focused Growth option; in the impacts/ benefits chart on p. 175 under Growth in Opportunity Areas, the TFG column should identify specific mitigation strategies and discuss the potential that these be required; Again under element 5.8 on p. 177, the final section states "Implementation of the mitigation measures listed in sections 5.7 and 4.1 would help to reduce or avoid these impacts." It would be helpful to add language to support this conclusion.

Multicounty Planning Policies

Knowing that the Multicounty Planning Policies will be revised to be consistent with the preferred Regional Growth Strategy alternative and included with the draft plan when released in summer 2019, the City will review the policies at that time.

Commenter(s):

City of Redmond, Judy Fani, Carol Helland, Erika Vandenbrande

City of Sammamish

Communication ID: 354156

04/22/2019

The purpose of this letter is to provide feedback to the Puget Sound Regional Council (PSRC) on the VISION 2050 Draft Supplemental Environmental Impact Statement (DSEIS). The Sammamish City Council has reviewed the three regional growth alternatives proposed in the DSEIS and discussed their potential impacts on Sammamish. In summary, the City Council unanimously supports the Transit Focused Growth alternative.

The Transit Focused Growth alternative is the best option for Sammamish as it most closely aligns with the vision and values of our community. The City and its residents care deeply about environmental stewardship, and this alternative results in the least amount of land development, greatest habitat protection, and best air quality of the three options. However, we are concerned to see that fewer outdated stormwater controls will be updated with this alternative, and we would like to see plans for how those controls will be updated in the future.

Considering the challenges of housing affordability and equity in Sammamish and in the region, we also appreciate that this alternative would result in a net benefit for lower income individuals and communities of color. Although we would like to see options for how the increased risk of displacement can be counteracted.

According to the 2018 INRIX Global Traffic Scorecard, Seattle was the sixth worst city in the country for traffic, with drivers spending an average of 138 hours per year stuck in traffic at a cost of \$1,932 per motorist. The additional 1.8 million people projected to move to this region by 2050 will only exacerbate these issues, so now is the time to direct new growth towards areas with high capacity transit.

The City's neighbors to the north and south are both scheduled to receive light rail stops; our challenge will be in developing strategies for how we move our residents to and from those stops. Therefore, even though we support the Transit Focused Growth alternative, we would hope and expect to not have any less support for transit service in Sammamish in the future. It is critical that those cities without high capacity transit receive additional bus stops and routes to connect into the regional high capacity transit system.

We appreciate the opportunity to provide input and look forward to participating in the VISION 2050 process. Please reach out if we can provide any further information.

Christie Malchow, Mayor

Commenter(s):

City of Sammamish, Christie Malchow

City of Seattle

Communication ID: 354651

04/26/2019

April 29, 2019

Josh Brown, Executive Director

Puget Sound Regional Council

Suite 500

1011 Western Avenue

Seattle, WA 98104

Dear Mr. Brown:

Thank you for the opportunity to provide comments on the Draft Supplemental Environmental Impact Statement (DSEIS) for VISION 2050. With the four-county central Puget Sound region expecting an additional 1.8 million people and 1.2 million jobs by 2050, it is extremely important that the region continue to collaborate around ambitious policies and actions to manage growth for a more environmentally sustainable, equitable, and prosperous region with a high quality of life for all residents.

Since VISION 2040 was adopted in 2008, the region's rapid growth has contributed to challenges related to housing affordability, equitable development and displacement, regional mobility, and environmental threats. Steps have been taken to respond to these challenges through local comprehensive plans, major investments toward a regional transit system, regional and local steps to address climate change, and expanding efforts to create and preserve affordable housing. However, much work remains.

The DSEIS analyzes the impacts of three alternative future growth patterns – Stay the Course (no change from VISION 2040), Transit Focused Growth (major emphasis on transit-oriented development), and Reset Urban Growth (a more dispersed growth pattern). The DSEIS clearly shows that the Transit Focused Growth performs better than the other alternatives across a range of environmental measures. These include a sustainable land use pattern, multimodal mobility benefits, housing affordability, race and equity, and impacts on the natural environment.

Based on these results and consistent with the direction in the Seattle 2035 comprehensive plan, we urge the Growth Management Policy Board (GMPB) to retain a robust transit-focus in the regional growth strategy that recognizes sustained growth in King County and its major cities. Just as important, the GMPB should recommend strong Multicounty Planning Policies and regional and local actions to mitigate the impacts of growth. We look forward to working with our colleagues from around the region to craft a preferred alternative and draft plan by July of this year.

The remainder of our comments focus on four key areas to address in VISION 2050.

Compact Transit-Served Urban Growth

The state Growth Management Act calls for local governments to work together to focus housing and jobs through compact urban development within Urban Growth Areas. King County and its cities have had substantial success in steering growth away from our rural and resource lands outside of the Urban Growth Area (UGA) boundary. VISION 2050 should build on this trend across the region by minimizing the amount of growth outside of or near to the UGA boundary. With only 2% of residential growth

outside the UGA and 6% within a ¼ mile of the boundary, Transit Focused Growth performs better than other alternatives.

Inside the UGA, housing and employment should be focused within recognized centers and other areas with access to high capacity transit (HCT). Among the alternatives, Transit Focused Growth places more housing and jobs in cities, like Seattle, that contain one or more Regional Growth Centers, and, overall, sets an ambitious goal of achieving 75% of the region's growth within walking distance of transit.

As shown in the DSEIS results, Transit Focused Growth increases the proximity of jobs and housing to each other and to the future regional transit network and results in residents spending less time travelling to work and other destinations and less time stuck in traffic. This alternative also significantly increases transit ridership, which is essential for the region to continue to grow and prosper. A predominantly transit-oriented development pattern achieved across the region will result in more efficient use of our transportation system, especially in and out of Seattle and other major employment centers. With the region investing billions of dollars to connect centers through light rail extensions, we must leverage this investment with complementary transit investments and focused growth to best achieve the values and desired outcomes of VISION 2050.

VISION 2050 should strongly support and encourage local efforts in all jurisdictions served by regional transit to focus growth around those investments, including:

- Promote station area planning around light rail and other key HCT access points
- Establish ambitious standards for transit-supportive densities across a range of communities
- Promote local policies and tools to incentivize dense mixed-use development within transit station walksheds
- Encourage an increased supply and variety of nearby housing options with accessible "last mile" connections to regional transit
- Set high expectations for equitable transit-oriented development (TOD) in all station areas, especially where displacement risk is high
- Promote tools to steer growth away from outlying areas, including unincorporated areas within the UGA that lack transit

As the GMPB works toward a preferred alternative that is both ambitious and realistic, additional analysis may be needed. This may include data on current and potential future capacity in the region and future scenarios for station area buildout timed with the phased implementation of ST3 and other transit investments.

Race and Social Equity

The City of Seattle plans for race and social justice through inclusive community engagement and equitable development, and, along with PSRC and other jurisdictions throughout the region, committed to these principles by signing onto the Growing Transit Communities Strategy in 2014. PSRC's efforts to incorporate race and equity into the VISION 2050 planning process, including new and improved data approaches included in the DSEIS, are commendable.

Updated opportunity mapping and data on regional demographics reveal significant disparities within the region among people of different races and incomes in access to housing, jobs, mobility options, quality education, and healthy communities. The implications of this analysis are twofold. First, VISION 2050 should expand access to high opportunity areas by focusing housing, especially affordable housing, in those communities. Second,** VISION 2050 should address existing disparities in communities that have suffered from historical disinvestment.**

Analysis of demographic trends in the DSEIS shows the region to be increasingly diverse overall, with diversity spread across more communities. Geographic trends also suggest displacement of people of color from Seattle to suburban areas has occurred. New analyses of displacement risk indicate more communities that are vulnerable to being forced from their homes through redevelopment and economic pressures in the future.

We concur with the general conclusion of the DSEIS that all three growth alternatives would heighten displacement potential in these communities. While the Transit Focused Growth alternative places the most residential growth (23%) in at risk communities, there are multiple other equity and anti-displacement benefits of Transit Focused Growth that should also be considered, including the potential to provide an adequate supply of housing choices, including affordable housing, where demand is highest – near transit, jobs, education, and services. TOD has the greatest potential to reduce the combined household costs of housing and transportation.

With race and equity as a policy emphasis threaded throughout VISION 2050, each chapter must include strong and explicit policies that:

- Are based on a clear and consistent definition of equity that explicitly recognizes race and racial disparities within the region
- Set clear expectations for local action to adopt tools and strategies for equitable development, inclusive community engagement, and community driven planning
- Further adoption of effective displacement mitigation strategies that are scaled to address the local and regional need, including strategies in Table 19 in Appendix H
- Support ongoing regional collaboration to address race and equity

Housing and Housing Affordability

The region faces an ongoing housing affordability crisis, including skyrocketing home prices and rents, displacement of low-income households, homelessness, and long commutes, often by car, due to a mismatch of jobs and housing. VISION 2050 should be a platform for regionalizing an urgent response to this crisis. Housing is regional, and all cities and counties have a responsibility to act.

The planned pattern of growth in the region will shape housing outcomes. The DSEIS finds that Transit Focused Growth creates more housing in areas of highest demand near transit and employment centers. It also performs best in promoting high and moderate density housing types that provide more housing variety and affordability than do areas planned exclusively for low-density detached housing. Identified as a key measure in the DSEIS, moderate density housing can provide rental and ownership options for low to middle income households as well as larger units for families. While Transit Focused Growth achieves the highest share of moderate density housing (19%) based on current zoning, the actual

potential is even higher, as communities consider future zoning changes both within and nearby transit station areas.

To address a much broader range of housing issues, PSRC should prioritize two key actions: the regional housing needs assessment and regional housing strategy, which should include:

- A regional framework for estimating regional and local housing needs, monitoring of outcomes, and local accountability
- Multi-jurisdiction approaches to increasing funding available for affordable housing
- Replicable models to leverage new development with incentives and requirements to include affordable units (Mandatory Housing Affordability adopted by City of Seattle is one such model and there are others)
- Emphasis on households most in need, typically below 50% of Area Median Income

Climate Change Mitigation and Adaptation

Among the regional growth strategy alternatives, Transit Focused Growth scenario provides the most benefits related to climate change and other aspects of the environment. At the same time, considerably more needs to be done to build on the modest reductions in emissions likely to result from this growth pattern. Beyond the potential mitigation measures identified in the DSEIS for transportation and climate change, PSRC should also consider:

- Formally adopting regional greenhouse gas reduction goals, in line with those already established by multiple municipalities, King County, and the Puget Sound Clean Air Agency, along with global efforts to keep global temperature increase below 1.5 degrees Celsius in this century in order to avert massive disruptions due to climate change.
- Decarbonizing transportation beyond the urban core, such as policies that drive electrification of the transportation sector beyond urban areas, including support for public EV charging infrastructure in rural/suburban/urban areas, bus and freight electrification, and highway policies that incentivize electric vehicle use.
- Policies to drive on-site renewable energy, community solar efforts, and renewable energy targets for municipalities and counties.
- Addressing issues of embedded carbon sources of emissions with policies that support a growing market for lower carbon asphalt, cement, and other building materials.
- Increased focus on resilience planning to mitigate climate impacts, particularly for low-income communities of color who may be at greater risk from flooding, higher summer temperatures, and hazardous air quality events.

As the City of Seattle drives towards our own goals and targets, including execution of the Mayor's Climate action strategy and our commitment to being carbon neutral by 2050, we want to underscore our shared responsibility with the rest of the Puget Sound region. VISION 2050 is an opportunity to redouble efforts and put forward the boldest strategies to combat climate change, prepare for inevitable climate impacts, and prosper in a carbon-constrained/free future.

We appreciate the opportunity to comment on the DSEIS and look forward to collaborating with PSRC and our partners in the region to advance equitable and sustainable growth. Please don't hesitate to contact Michael Hubner, Long Range Planning Manager, at 206-684-8380.

Sincerely,

Samuel Assefa

Commenter(s):

City of Seattle, Samuel Assefa, Michael Hubner

City of Shoreline

Communication ID: 351865

04/08/2019

April 8, 2019

Erika Harris, SEPA Official

Puget Sound Regional Council

1011 Western Avenue, Suite 500

Seattle, WA 98104

Via Email: VISION2050SEIS@psrc.org

RE: VISION 2050 SEIS Comment

To Erika Harris:

The City of Shoreline ("Shoreline") would like to take this opportunity to convey to PSRC our initial comments in response to Puget Sound Regional Council's VISION 2050 Draft Supplemental Environmental Impact Statement. We appreciate the amount of work that has gone into preparing the DSEIS, and the opportunity for the public to provide input on how and where the central Puget Sound region should grow.

Over the next 30 years, the region is forecasted to grow by 1.8 million additional people and 1.2 million for new jobs.

PSRC has identified three growth alternatives in the DSEIS and Shoreline's preferred growth strategy is the Transit Focused Growth alternative. The Transit Focused Growth alternative considers a compact growth pattern based on the VISION 2040 Regional Growth Strategy that assumes accelerated growth near the region's existing and planned transit investments.

Shoreline has already begun planning for the region's future growth by adopting zoning, development regulations, and subarea plans that support increased housing and jobs along high-capacity transit corridors, including light rail and bus rapid transit.

The Aurora Corridor through Shoreline is home to King County Metro's E-Line. The area adjacent to Aurora is designated Mixed-Use and zoned Mixed-Business and Town Center. The Mixed-Business and Town Center 1, 2, and 3 zones are the City's most intense zoning that allows a mix of dense housing and employment centers that can support a wide range of jobs.

Shoreline has also adopted and is starting to implement the two light-rail station subarea plans at Sound Transit's Shoreline North/1851h and Shoreline South/1451h light rail stations. The City Council took the bold steps to designate roughly 472 acres around both stations for a mix of townhomes, rowhomes, apartments, office, retail, and community uses that will support Sound Transit's ridership goals and the City's commitment to a sustainable future locally and regionally.

The Transit Focused Growth alternative that states that the region's population and employment growth should occur within a quarter to a half-mile from current and planned high-capacity transit station areas, including light rail, bus rapid transit, commuter rail, ferries, and streetcar is consistent with Shoreline's Comprehensive Plan Goals and Policies. Specifically, Land Use Goals and Policies LU11 through LU17 encourage the development of walkable places with architectural interest that integrate a wide variety of dense walkable communities, retail, office, and service uses.

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Statement for VISION 2050.

Rachael Markle, AICP, Director

City of Shoreline Planning & Community Development

[Commenter\(s\):](#)

City of Shoreline, Rachael Markle

[City of Snoqualmie](#)

[Communication ID: 353738](#)

[04/16/2019](#)

April 29, 2019

ATIN: VISION 2050 Draft SEIS Comment

Puget Sound Regional Council

1011 Western Avenue, Suite 500

Seattle, WA 98104-1035

Dear Puget Sound Regional Council,

The City of Snoqualmie commends the consideration applied to the draft VISION 2050 growth options to date.

Generally, the City supports the opportunities and measures in the Transit Focused Growth scenario. The DEIS demonstrates that Transit Focused Growth will yield many positive outcomes such as an 84% increase in transit trips; an 83% share of high density King County growth; and a 16% reduction in Greenhouse Gas Emissions.

However, the City of Snoqualmie maintains concerns that selection of the Vision 2050

Transit Focused Growth option will encourage PSRC use of growth targets as a blunt instrument in small city relationships. To date, growth targets provided to the City of Snoqualmie have not adequately incorporated signed development agreements and local growth trends- the last PSRC certification of the City Comprehensive Plan was particularly embattled at the staff level. City staff were frequently left with the impression that small cities, despite their clear legal standing within the Urban Growth Area, were considered functionally equivalent to rural areas in PSRC assessments- despite our GMA mandate to deliver urban services, and urban development densities.

Were PSRC to proceed with selection of the Transit Focused Growth scenario, the City would strongly encourage three approaches to reduce regional friction:

- Involve city staff in transparent target-setting, so staff can ensure PSRC targets are adequately informed;
- Support a continued definition of growth targets as a minimum population target to be met for all urban growth areas, the foundational GMA requirement that applies uniformly to all the UGA- be it a small City or large City.
- Base consistency determinations on policies- such as TOD incentives in large cities targeted for higher levels of growth - rather than on one set of numeric criteria.

The Draft Environmental Impact Statement indicates the Transit Focused Growth alternative is a strong path forward, which the City conceptually supports- but it should not at be used as an excuse at a later date to back small cities into a corner.

Matthew R. Larson

Mayor

[Commenter\(s\):](#)

City of Snoqualmie, Matthew Larson

City of Steilacoom

Communication ID: 354852

04/29/2019

April 26, 2019

Mr. Josh Brown

Executive Director

Puget Sound Regional Council

1011 Western Avenue, Suite 50

Seattle, WA 98104-1035

Re: SEIS Comments Dear Mr. Brown:

Thank you for the opportunity to comment on the draft Supplemental Environmental Impact Statement for Vision 2050.

PSRC has crafted three alternatives for evaluation, all of which seem to be academic exercises with little grounding in reality. Additionally, using VISION 2040 as the baseline further compounds the exercise given it does not reflect what is and has actually occurred since its adoption. Multi-county Planning Policies (MPPs) will have to be written later to implement whichever alternative is selected. The reliance on undisclosed policies to achieve the goals of the alternatives makes it nearly impossible to evaluate the impact any of the alternatives would have on the environment or the Town's operations in the coming years.

In March of 2018, PSRC solicited the Town's input on VISION 2050. In the comment letter to you dated March 14, 2018, the Town requested that up-to-date real-world data be used to guide the update. Specifically, the Town was interested in existing population and employment locations and trends; permitted infrastructure projects and planned-for development; a review of the targets set for employment and population and the actual experienced employment and population growth by geography; a forecast of V1e impacts continued growth will have on travel corridors, including whether increased traffic congestion will slow or discourage economic development within the region; and for the entire process to be based on reality rather than hoped-for planning.

Sadly, this request fell on deaf ears. With this document, it appears that PSRC will continue to ignore the facts on the ground in favor of pursuing its idealized vision of the future.

PSRC's approach is predicated on local jurisdictions directing development, a power they do not possess. Local jurisdictions have a duty under the Growth Management Act to plan for growth within their boundaries. That is a far cry from directing owners of property to develop their property. For instance, the Town has an industrial site that has sat idle since the paper mill closed in 2000. If it were up to the Town's government, that site would be providing living-wage jobs and improving the work/life balance for the Town's residents. But the Town cannot force the owner to develop the property, despite being "allocated" an increase in employment.

The DSEIS's preference for growth in incorporated areas is not based on the Growth Management Act. Any land within an Urban Growth Area is available for urban-style growth. Pierce County's UGA is large and encompasses a significant area outside incorporated cities and towns, but it is still to be developed at urban densities. All of these alternatives treat urban lands outside of incorporated areas as second class, to be restricted by as-yet-written policies. There is no basis in the Growth Management Act for this distinction. Such policies potentially stifle economic expansion and continue the concentration of economic viability to a few areas leaving the others to provide services without a sustainable tax base.

Given the constraints outlined above, the Town submits the following comments on the alternatives.

Stay the Course

Ostensibly a continuation of the current Regional Growth Strategy, this alternative is touted as the "no-action" alternative. In reality, adopting this alternative will require the adoption of new unspecified policies in order to meet its stated goals of increasing employment in Kitsap, Snohomish and Pierce counties, reducing growth in the unincorporated areas and increasing redevelopment in the urbanized areas.

In its 2018 comment letter, the Town requested that PSRC recognize that Vision 2040 is a plan, not an existing reality. The Town requested a "no-action" alternative that follows the existing population and employment trends, not the Vision 2040 planned-for trends. In other words, the opposite of what PSRC produced.

This alternative envisions less growth in the urban unincorporated and rural areas and more growth in cities than has historically been the case. It is unclear how this is to happen, except by the adoption of policies which would restrict building on existing urban zoned lots within the urban unincorporated areas. The Town is cognizant of RCW 36.70A.020(6) and is curious to see how the rights of landowners will be protected.

In its 2018 comment letter, the Town requested review of the impacts of concentrating economic development in centers on housing affordability and traffic congestion. The DSEIS only looked at which County would produce the most high, medium or low density housing. There seems to be no analysis of what the effect of having high density housing in King County, low density in Kitsap and a mix in Pierce and Snohomish County would bring. Will this housing diversity across the region increase or decrease the supply of affordable housing and what effect will it have on traffic congestion?

Transit Focused Growth

This alternative assumes that the 2017 population projections will continue into the future, placing more growth in King County than Pierce, Kitsap and Snohomish. Like the Stay the Course alternative, this alternative relies on unstated policies to achieve its goal of more growth in Metropolitan, Core and HTC cities/areas.

The Town's comments on the Stay the Course alternative are equally applicable to this alternative. Without draft MPPs, the Town cannot constructively critique this alternative, but the restrictions on growth under this scenario would have to be more severe than those under the Stay the Course option.

What effect this alternative would have on the regions' economy, traffic congestion, and affordable housing supply are not discussed. Additionally, large segments of Pierce County are either not served by transit or have so little service as to effectively be unserved. This fact further highlights the academic versus reality-based nature of this option.

Reset Urban Growth

This is the only alternative that uses Buildable Lands data to create its assumptions, for which PSRC should be commended. However, the alternative still assumes that growth in unincorporated urban areas will be lower than historic norms. Despite the fact that property is still available for development

in unincorporated areas, no explanation is offered for how growth will be restricted and channeled into incorporated areas.

As with the other alternatives, major environmental questions go unexplored. No analysis is provided on the effects of this alternative on the regions' economy, traffic congestion, and affordable housing supply.

Other Environmental Impacts

In its 2018 comment letter, the Town requested environmental review of two topics which do not appear to have been considered.

Impacts of traffic congestion on continued economic growth.

2. Impacts of concentrating economic development in centers on housing affordability and traffic congestion.

We would ask that at a minimum these considerations be added. Thank you for this opportunity to comment on the DSEIS for VISION 2050.

Sincerely,

Paul Loveless

Town Administrator

[Commenter\(s\):](#)

City of Steilacoom, Paul Loveless

[City of Sumner](#)

[Communication ID: 354695](#)

[04/29/2019](#)

April 29, 2019

Puget Sound Regional Council

Attn: VISION 2050 Draft SEIS Comment

1011 Western Avenue, Suite 500

Seattle, WA 98104-1035

RE: VISION 2050 Draft Supplemental Environmental Impact Statement

To Whom It May Concern:

Vision 2050 has the potential to be an effective regional growth planning document that would provide meaningful guidance to the counties and cities in the Puget Sound Region. However, this guidance must be balanced against the latitude given to local jurisdictions under the growth

management framework in the state of Washington, which is bottom up approach, not a top down approach, to growth management planning. This bottom up approach to growth management planning is reflected in the Puget Sound Regional Council's (PSRC) 1993

Interlocal Agreement Mission Statement which provides that PSRC will adopt and maintain goals and policies "...based on local comprehensive plans of jurisdictions within the region."

The focus of the DSEIS is on the Regional Growth Strategy (RGS) -the desired growth pattern within the 4-county region. At the local level, the RGS serves as guidance for the establishment of 20-year population and housing targets. These targets are incorporated into individual jurisdictions' comprehensive plans. These local targets serve as the basis for growth assumptions and identifying needed capital facility improvements to support existing and future growth. With the relationship between the RGS and local planning, this desired growth pattern must balance the larger regional objectives with one which can be reasonably achievable by all jurisdictions.

The City can support a preferred alternative that encourages growth to occur adjacent to transit and within centers to take advantage of the large investment the region is making in mass transit over the next two decades. However, the final alternative selected must recognize realistic growth expectations and the public and private investments that have been made based on the existing urban growth area boundaries.

The City does support PSRC's effort to combine certain unincorporated urban areas within other geographies in the RGS as a way of incorporating reality into the planning for the region (e.g. considering the Tacoma PAA is within the HTC Communities Geography because of a Bus Rapid Transit (BRT) route). The City believes that as part of the selected alternative it would be just as logical to include other unincorporated PAAs and Potential Incorporation Areas (PIA) under the "Core" or "Cities and Towns" Geographies because these areas are planned to be annexed or to become cities. This would ensure that the planning would support the envisioned future versus using up capacity at lower levels that could hinder annexation or incorporation. The region must maximize capacity within the existing urban growth area to lessen the need for expansion in the future. It would be contrary to the GMA to limit growth within the established UGA, as once the areas are built at a lower density the capacity is gone this may result in the need to expand the UGA in the future.

It is questionable if the growth allocations associated with the Stay the Course and Transit Focused Growth alternatives can be realistically achieved throughout the region. To achieve either of these RGS targets some jurisdictions and "Geographies" will need to grow at rates never experienced in the past 10 years, while other jurisdictions will have to take actions to significantly restrict growth. If PSRC is committed to mandating these unrealistic growth rates, how will jurisdictions that are not achieving the higher rates be evaluated during the next comprehensive plan update? Additionally, as noted in the letter from the City of Lakewood, the "Transit Focused Growth" alternative has an explicit goal for seventy-five percent (75%) of the

region's population and employment growth to occur within regional growth centers and in close proximity to high-capacity transit, this may be unrealistic. As noted in Lakewood's letter the more realistic goal is closer to sixty percent (60%).

If the region is truly committed to achieving more growth in proximity to transit, one mitigation measure that must be included in the Final SEIS is a commitment to working with the state legislature to make it easier for jurisdictions within the urban growth area to either join an existing transit district or create a transit district. PSRC must use its legislative influence to support legislation that addresses this fundamental flaw in the objective of having housing supported by transit.

The growth alternative selected must also address the job-housing balances in a more realistic way. In order to address the current imbalance that is contributing to increasing commute times, more employment is needed in the South Sound. We, as a region, need to work together to identify what steps can be taken to make a more equitable distribution of jobs a reality. This is a complex issue that revolves around such issues as wages and housing prices at the sub-regional level, i.e. can a person afford to live where they work. Sumner echoes Pierce County in that there needs to be more employment in the South Sound. It needs to be more than a paper exercise to identify what steps can be taken to make a more equitable distribution of jobs a reality. The City of Sumner prefers a mix of the Transit Growth Alternative and the Economic Dispersion Alternative. Out of all PSRC jurisdictions and geographic areas, King County has seen the vast majority of economic and job growth in recent years, but slow housing growth by comparison, creating significant transportation congestion. These trends cannot continue. Jobs must be disbursed throughout the Central Puget Sound in order to achieve a myriad of desired outcomes, including but not limited to:

- alleviating transportation pressure;
- improving housing affordability near the workplace;
- improving the region's economic resiliency following natural disaster;
- improving air quality via less transportation congestion; and
- ensuring long term financial viability of all counties and all local jurisdictions.

We are hopeful that our comments and concerns will be addressed in either the FSEIS or the draft multicounty planning policies. Our requests reflect the necessity to have a realistic and equitable growth pattern in Vision 2050. This, in conjunction with focused Multicounty Planning Policies, will provide for a meaningful and implementable coordinated regional growth plan to set the stage for the next 30 years.

Thank you for the opportunity to comment on the DSEIS for Vision 2050. We look forward to working with PSRC and other member jurisdictions to formulate a preferred alternative that addresses the issues raised in this letter.

Sincerely,

Mayor William L. Pugh

City of Sumner

[Commenter\(s\):](#)

City of Sumner, William Pugh

City of Tacoma

Communication ID: 354752

04/29/2019

April 2, 2019

Erika Harris, AICP

SEPA Responsible Official, SEIS Project Manager

Puget Sound Regional Council

1011 Western Avenue, Suite 500

Seattle, WA 98104-1035

RE: VISION 2050 Draft Supplemental Environmental Impact Statement Comments

Dear Ms. Harris:

Thank you for this opportunity to comment on the Draft Supplemental Environmental Impact Statement (SEIS) for VISION 2050. The City of Tacoma provides the following recommendations on the regional development strategy:

Of particular significance to the City of Tacoma in comparing the three alternatives are the set of improvements that "Transit Focused Growth" advances over "Stay the Course":

Improved job housing balance

More moderate and high density housing

Significantly more population and employment growth near high capacity transit (HCT)

Greater proximity to HCT for communities of color and low income communities

Less impervious surface added

Less land developed

Less growth in areas with regionally significant habitat

The major drawback to adopting this alternative is that more growth is projected to occur in areas with a higher displacement risk. However, this can and must be offset by adopting a strong set of mitigation measures drawn from the "Potential Mitigation Measures" set forth in Chapter 4 of the Draft SEIS. The analysis of precisely which mitigation measures should be further developed and adopted and must be a part of the Final EIS and incorporated in the updated Multi-County Planning Policies. With this stipulation the City supports the use of the "Transit Focused Growth" alternative over "Stay the Course" alternative.

2. The City notes that the "Transit Focused Growth" alternative better addresses the new realities of HCT and the expansion of Regional Geographies set forth in Table 3.1-2 to HCT

Communities, defined as other cities and unincorporated urban areas-planned for annexation or incorporation-with high capacity transit. HCT is defined as existing or planned light rail, commuter rail, ferry, streetcar, and/or bus rapid transit. Given the work that Pierce Transit is undertaking to secure all the funding necessary to establish bus rapid transit (BRT) from Downtown Tacoma to Parkland and Spanaway, it is helpful and appropriate that Draft SEIS Table 3.1-2 identifies the Tacoma Potential Annexation Area as one of 31 HCT Communities in the region. The City agrees that it is important to the region to carve out HCT Communities from what is otherwise simply Urban Unincorporated Areas, now defined as urban areas without high capacity transit and/or not affiliated for annexation or planned for incorporation. We are also of the opinion that more attention needs to be given to major transit routes that have not yet received the BRT capital investments, but still have significant ridership.

On the topic of Table 3.1-2 the City supports the new regional geography of Major Military Installations (installations with more than 5,000 enlisted and service personnel). This formal recognition of the regional and statewide importance for Joint Base Lewis-McChord is timely.

The City of Tacoma is adamantly opposed to the "Reset Urban Growth" alternative. The Draft SEIS identifies the following negatives if VISION 2050 were to move from the City of Tacoma's preferred alternative of "Transit Focused Growth":

Reduced job housing balance

Less moderate and high density housing

Significantly less population and employment growth near high capacity transit (HCT)

Less proximity to HCT for communities of color and low income communities

More impervious surface added

More land developed

More growth in areas with regionally significant habitat

Certainly there would be a reduced displacement risk but this can and must be offset by adopting a strong set of mitigation measures drawn from the "Potential Mitigation Measures" set forth in Chapter 4 of the Draft SEIS. The analysis of precisely which mitigation measures should be further developed and adopted must be part of the Final EIS and incorporated in the updated Multi-County Planning Policies.

Finally, this alternative is in direct conflict with the State Growth Management Act's mandate of reducing sprawl (Draft SEIS, page 3) and the objective of the Regional Growth Strategy of "Within urban growth areas, focus growth in cities" (Draft SEIS, page 4).

3. The City strongly supports the Regional Growth Strategy of adjusting employment shares to encourage additional employment growth in Kitsap, Pierce, and Snohomish Counties (Draft SEIS, page

84).

It is important to highlight that VISION 2050 and its associated Draft SEIS builds on VISION 2040 and the Final Environmental Impact Statement (FEIS) associated with VISION 2040. The Draft SEIS explicitly recognizes this on page 78 which states:

"Build on VISION 2040. In order to comply with the objectives and mandates of the state GMA and to fulfill the purpose and need for action, VISION 2050 builds on the base of the policies and actions and Regional Growth Strategy adopted in VISION 2040." The focus of the update is to clarify aspects of the vision and make improvements that reinforce a common regional vision of greater environmental sustainability, access to prosperity, and a high quality of life. VISION 2050 is anticipated to continue to reflect GMA's objectives of containing the expansion of urban areas; conserving farmlands, forests, and open spaces; supporting more compact, people oriented living and working places; and focusing a significant amount of new employment and housing into cities with vibrant urban centers."

As you know, if a fundamental change in direction from VISION 2040 to VISION 2050 was anticipated a SEIS would not be appropriate and a new Draft and Final EIS would be necessary. The City submits that the "Reset Urban Growth" alternative as developed in the Draft SEIS represents such a fundamental change that it far exceeds the scope of a SEIS. To pursue such sweeping changes would necessitate the development of a new FEIS.

Further, the "Reset Urban Growth" alternative as developed in the Draft SEIS on its face fails the threshold test set up in the Executive Summary page 3 which states:

"Each of these three alternatives is intended to help preserve resource lands, protect rural lands from urban-type development, and promote infill and redevelopment within urban areas to create more compact, walkable, and transit-friendly communities."

It also fails the first part of the overall test on Draft SEIS page 78 quoted above as it does not in any shape, fashion, or form "...make improvements that reinforce a common regional vision of greater environmental sustainability, access to prosperity, and a high quality of life...". Finally, it fails the second part of the overall test on Draft SEIS page 78 as it fails in "...supporting more compact, people oriented living and working places; and focusing a significant amount of new employment and housing into cities with vibrant urban centers".

Again, thank you for this opportunity to comment.

Sincerely,

Elizabeth Pauli

City Manager

[Commenter\(s\):](#)

City of Tacoma, Elizabeth Pauli

City of University Place

Communication ID: 354783

04/29/2019

April 29, 2019

Puget Sound Regional Council

Attn: VISION 2050 Draft SEIS Comment 1011

Western Avenue, Suite 500

Seattle, WA 98104-1035

RE: VISION 2050.Draft Supplemental Environmental Impact Statement

To Whom It May Concern:

Thank you for the opportunity to review and comment on the VISION 2050 Draft SEIS. The City of University Place has similar concerns to those expressed by other Pierce County jurisdictions. Specifically, we have concerns about how the FEIS and VISION 2050 will impact our city's ability to plan for its unique future under one-size fits all mandates that may be contrary to a locally-sensible allocation of limited resources.

We agree with Bonney Lake's and Lakewood's assertions that growth management planning should follow a bottom-up approach, rather than top down directives from the regional planning agency. Any mitigation identified in the FEIS, along with any multicounty policies and related actions, should represent guidance, rather than reflect mandated requirements or conditions for comprehensive plan certification. This is not to say that mitigation measures, policies and actions can be ignored, however. We recognize they are necessary to implement whichever alternative (or hybrid of alternatives) that is eventually adopted and meets requirements for federal transportation funding.

2. Likewise, growth targets for population, housing and employment must be flexible, perhaps by providing a range of estimates, not unlike the Office of Financial Management's low, medium and high population forecasts. Doing so will recognize other factors that influence planning for growth and growth itself. For example, growth targets assigned the City were informed by the 2014

Pierce County Buildable Lands Reports and allocations adopted by County Ordinance. A low persons per household number, which we objected to at the time, required us to plan for far more housing units than needed for certification. Since that time, the persons per household number has been reevaluated and increased significantly in preparation for the next buildable land report.

3. Ultimately, market and other forces will determine growth rates, as demonstrated by local trends in comparison to regional forecasts. Unless we recognize this, jurisdictions will continue defending their growth (or lack of thereof) as "bending the trend," suggesting that they may be growing slower or faster than targets suggest they should and making up the difference in later years. Planning for more or faster growth than will likely occur has significant impacts on the

allocation of limited resources to plan for and build supporting infrastructure and produces false expectations of what is needed.

4. The City supports a growth pattern that emphasizes compact mixed-use development, supports transit, regional growth centers and a better jobs housing balance that might result from a hybrid of the "Stay the Course" and "Transit Focused" alternatives. However, we think it is unrealistic to expect that 75% of growth will occur within ½ mile of a High Capacity Transit, except perhaps in King County. A dramatic shift in society and the economy would need to occur to produce such a result, even with a 30-year horizon, given the slow rate at which High Capacity Transit is being rolled out. ·

5. Similarly, creating a better job/housing balance throughout the region will require a significant change in the distribution of area employers, much higher costs of commuting, and/or a redistribution or funds for infrastructure improvements to support employment opportunities.

6. The potential mitigation measures provided in the Draft SEIS are vague and leave a lot to the imagination. For example, under Housing and Employment, use of the phrase "Mitigate transportation impacts to promote economic prosperity and quality of life," and under Transportation, use of the phrase "Adopt and implement policies that reduce the impacts of growth." Will these mitigation measures be more well defined in Multicounty planning policies developed after the preferred alternative is chosen?

Once again thank you for the opportunity to comment on the VISION 2050 Draft Supplemental Environmental Impact Statement, we look forward to providing additional comments on the Draft VISION

2050, the Regional Grow Strategy and Multicounty Planning Policies.

Should you have any questions, please do not hesitate to contact me at [phone number, email address].

Sincerely

David Swindale, AICP

Director, Planning and Development Services

Copy: Steve Sugg, City Manager

Commenter(s):

City of University Place, David Swindale

City of Woodinville

Communication ID: 354158

04/22/2019

April 22, 2019

Puget Sound Regional Council Executive Board c/o Mr. Paul Inghram

1011 Western Avenue, Suite 500

Seattle, WA 98104

Dear Puget Sound Regional Council Executive Board:

The City of Woodinville wishes to thank PSRC for the robust public outreach process undertaken with regard to the development of the Draft Supplemental Environment Impact Statement (SEIS), including taking into consideration the City of Woodinville's comments herein.

As presented, the Draft SEIS reviews the environmental impacts of three regional growth alternatives for VISION 2050: "Stay the Course (No Action)"; "Transit-Focused Growth"; and "Reset Urban Growth". The City of Woodinville encourages PSRC to carry forward "Transit-Focused Growth" as the preferred alternative for several reasons. Focusing growth around transit hubs will positively impact residents, businesses, visitors, and employees in a number of

ways, including reducing green house gas emissions, vehicle delays, and improving the region's job access and jobs-housing balance. The remaining alternatives do not perform nearly as well among many of these metrics. Improvement in each of these issue areas becomes increasingly important as the region's population is expected to grow by 1.7 million people over the next 30 years, making the "Transit-Focused Growth" alternative the right choice.

Further, Woodinville has made a concerted effort to plan for and encourage growth in a way that aligns with and supports the "Transit-Focused Growth" alternative. As an example, many of the expected developments in the City over the next five years (currently in various stages of planning and with some under construction) are high density and mostly located in the

downtown core near the City's existing Park & Ride. The City has also recently revised its multi-family tax exemption program to further encourage and expand diverse, affordable, and high-density housing options within areas of the City that have the infrastructure and transit

availability to support it.

As PSRC continues to develop the Draft SEIS and Vision 2050, the City also asks the Council to be mindful and supportive of communities that do not yet have robust transit options. Woodinville and other municipalities outside of major transit and employment hubs only now have the opportunity to advocate and plan for expansion of transit options. These cities need future support from agencies such as PSRC, Sound Transit, King County Metro and others to facilitate growth in a smart and efficient manner. In short, Woodinville asks PSRC to look beyond existing transit hubs and plan for resources and support for areas that will undergo increases in transit demand in the future.

Woodinville intends to follow this process closely to understand each approach's implications with regard to job and population figures. The City also asks that PSRC take into consideration jurisdictions' comments on these calculations as they have implications for cities' planning efforts as well as other regional and County plans.

Thank you again for the opportunity to participate in the development of PSRC's Draft SEIS and Vision 2050. The City looks forward to continuing to partner with the agency and others as the region continues to grow and develop into one of the country's most livable.

Sincerely,

Mayor Elaine Cook

Woodinville City Council

cc: Erika Harris, Senior Planner, PSRC

Brian Parry, Policy Director, Sound Cities Association

[Commenter\(s\):](#)

City of Woodinville, Elaine Cook

[Joint letter: City of Shoreline, City of Woodinville, City of Kenmore, City of Lake Forest Park, City of Bothell](#)

[Communication ID: 354325](#)

[04/24/2019](#)

April 29, 2019

Attn: Vision 2050 SEIS Comment

Puget Sound Regional Council

1011 Western Avenue, Suite 500

Seattle, WA 98104

Email: VISION2050SEIS@psrc.org

Dear Mr. Inghram:

The cities of Kenmore, Bothell, Lake Forest Park, Shoreline and Woodinville are jurisdictions located along the SR-522 bus rapid transit corridor. We are working collaboratively towards achieving a common goal supporting transit connections between our cities to the regional light rail system. As such, we offer support of the Transit-Focused Growth alternative described in the Vision 2050 Supplemental Environmental Impact Statement. This alternative recognizes the significant investment in transit and supportive land uses that our communities are making.

Locating new housing and employment in areas well-served by high-capacity transit has the potential to reduce car trips, impervious surface and greenhouse gas emissions, among other benefits. The Transit-Focused Growth alternative is the most environmentally sustainable of the three alternatives and will provide the most benefit to the residents and businesses in our communities.

Thank you for considering our comments. If you have any questions, please do not hesitate to reach out to us.

Sincerely,

David Baker, Mayor City of Kenmore

Jeff Johnson, Mayor City of Lake Forest Park

Will Hall, Mayor City of Shoreline

Andy Rheaume, Mayor City of Bothell

Elaine Cook, City of Woodinville

[Commenter\(s\):](#)

City of Shoreline, City of Woodinville, City of Kenmore, City of Lake Forest Park, City of Bothell, David Baker, Elaine Cook, Will Hall, Jeff Johnson, Andy Rheaume

Seattle Public Schools

Communication ID: 354693

04/29/2019

DEIS questions > Policy area V |

Does this element sufficiently tackle race and social equity? |

Is the DEIS analysis of circumstances and impacts correct? What's missing?

What benefits do we want to emphasize? What disproportionate burdens do we want to avoid? |

Mitigation - What is good or insufficient? What's missing? |

Accountability - How can we focus on action and implementation? |

Accountability - How can we use targets, performance measures, and consequences? |

Affordable Housing

This topic really needs to be addressed from the point of view of families who need this type of housing most.

My concern is that when "Affordable rents" are determined by the 30-60% AMI. As income levels are sure to rise in the city/region, the type of family and resident applying for and opting into this type of housing will vary and change with time. I think of the Central District as a hub/urban village where population is going to increase, transportation improvements will be made, and rents will be set to market rate if not a bit higher.

What exactly is affordable housing? The terms "Affordability" and "Affordable Housing" as they relate to Seattle/Puget Sound should clearly and plainly be called out in the Vision 2050 DEIS. My last comment is that there seems to be housing for those with the lowest incomes (families and individuals) and for higher income owners, are there any plans to make housing affordable to middle income families and individuals?

Housing Density

Are the 2050/PSRC ideas and plans around housing density aligned with the city's plans and their plans and understanding of how urban villages will be supported/built out?

I worry that not enough talking is happening between planning departments.

The City's OPCD has a loose Planning and Technical Partnership with the Seattle School District. I serve on that committee representing for the enrollment planning team and I'm happy to share the two reports that came out of our discussion and meetings.

Transportation commute times

The commute times are much longer given that more people choose to move and/or forced out of the city center and its surrounding areas. Rents have increased, evictions are on the rise. However, most jobs are still located in the city center. People will make the commute to make more money and support themselves and their families.

The investment in infrastructure is commendable; however, I think some residents are confused by the renovated Hwy 99 and the toll that is supposed to come soon. There are several transportation related projects happening all at once, but there isn't one website that provides timely updates in a readable and accessible format. If residents know which routes are safe and easy to access as alternatives to their regular and "under construction" routes, they will feel empowered and safer on the road.

Transportation safety

Does this relate to bicycle lanes?

I think a lot of residents aren't familiar with the new modes of transportation throughout the city and region. Is there a way to better communicate about the tram/trolley/limited bus route information in a more effective way?

The roads are narrower given bike and bus lanes. It forces drivers to slow down which is a good thing, but it also slows down traffic, and not everyone is considerate of cyclists and the changes coming online, especially if they weren't apart of the decision-making process.

Health

Provide Free and "pop up" clinics

I only know about the 1 day a year that free healthcare and dental care is offered to low income residents, and it is usually held at the Seattle Center. Maybe encourage that other locations be considered and maybe 2 days/year where one day is in the Spring and Fall to spread it out. One location is north downtown (Seattle) and the second day in south king county (place TBD)

It makes sense that the city center has been the primary location, but as demographics shifts by who can afford to live in the city center, we (researchers and planners) need to be proactive and meet residents where they live now.

Air Quality

Are construction zones using the best materials, recycling and disposing of materials in the best and most cost-efficient ways?

I work near the “Lander Bridge” project and the workspace gets larger by the day. It would be interesting to measure the impact on traffic, walkability, and pollution released into the air for several major projects across the region.

Maybe a page on a frequently used “Transportation website” could provide the ecological footprint details

Water

Some local schools need cleaner water, particularly in the southeast of the school district

What are the targeted efforts to include the Southeast and Southwest parts of cities within King County/Puget Sound in the 2050 plans?

This should be explicitly called out in the report and DEIS. It is time to center those communities and voices.

Land Use – Schools

Has the PSRC engaged the local school districts? If yes and yes with Seattle Public Schools, who is the primary contact/department?

Seattle Public Schools has a few departments that could contribute to this section in a meaningful way.

I’m happy to provide contact information for SPS staff most relevant to this topic

Namely Budget, Capital Planning, Enrollment Planning, Admissions, etc.

Displacement

The City’s OPCD organized a “Displacement Researchers Roundtable” led by Diana Canzoneri. I would offer that you reach out to her to retrieve those notes and the displacement risk indicators outlined in their ongoing study.

Try to distinguish which displacement is considered forced (eviction, etc.) and by choice (relocation). Some people leave because a place (neighborhood, school, etc.) is no longer familiar, inclusive, recognizable. Do housing partners like SHA/Mercy Housing/Solid Ground have any data to support any efforts made to keep the families most vulnerable for displacement within the city or current neighborhood? I’m thinking some relocation is based on voucher approval and housing options in certain neighborhoods, perhaps that are more “desirable” than others.

Commenter(s):

Seattle Public Schools, Natasha Rivers

Seattle Public Utilities

Communication ID: 354782

04/29/2019

VISION 2050 Comments on Supplemental Environmental Impact Report

Seattle Public Utilities, April 17, 2019

Drinking Water

The analysis of alternatives of Public Service and Utilities (4.7) indicates water supply impacts will be the same for all alternatives, although there are differences noted for stress to existing infrastructure and need for expansion of infrastructure. The analysis should take into consideration that higher densities under the Transit Focus Growth Alternative would likely result in lower total water use in the future than the other alternatives due to the lower water use per housing unit associated with multi-family and denser housing.

The affected environment, 2.15 Earth and 2.9 Public Services and Utilities, could be improved by including a summary of the recent studies conducted by the Water Supply Forum to look at seismic risks to water infrastructure.

Drainage and Wastewater

General comment / ES-18: Urban infrastructure needs associated with the alternatives are not well depicted by the table. Our existing urban wastewater (i.e., sewer) systems will have significant repair and replacement needs between now and 2050 – this is common across the alternatives, but not really addressed by the Exec Summary. Also, increasing growth and density in cities increases risks to human health and safety associated with stormwater or wastewater system failures, flooding etc. caused by a seismic event or increased by climate change. This is covered lightly in the document, so it's probably fine as is.

Page 48 (this concept is also in ES-18 table): "In addition, redevelopment of areas with outdated stormwater infrastructure can result in improvements to water quality through upgrades and improvements to stormwater management." I think it would be more accurate for Seattle if it said something like: In addition, stormwater management requirements for redevelopment can result in improvements to water quality.

Solid Waste

| Reference | Comment |

| --- | --- |

| Chapter 2, starting on page 9. | Does not address how solid waste stream or infrastructure has changed since Vision 2040. This might be addressed in Section 2.9 Public Services and Utilities. |

| Figure 2.6-2 on page 42 | It should be noted that a consumption-based inventory would show goods and materials as having a much larger contribution to emissions. This alternative approach indicates addressing full life cycle impacts of materials management is worth deeper effort than the scant effort

needed to address “solid waste” when those emissions are only shown as 2%. (See Figure ES-5 in <https://your.kingcounty.gov/dnrp/climate/documents/2015-KC-GHG-Inventory-Exec-Summary.pdf> or Figure ES-4 in this report <https://zerowasteeurope.eu/downloads/the-potential-contribution-of-waste-management-to-a-low-carbon-economy/>) |

| Pg. 138. “Solid Waste: Expansion of existing and/or addition of new transfer stations would likely be needed to accommodate increased solid waste generation.” | Recommend deleting this bullet. We do not agree this is a logical conclusion. |

| Pg. 141. Potential Mitigation Measures: Public Services and Utilities, “Topic: Solid Waste · Implement conservation measures, with emphasis on increased recycling* · Promote green waste practices throughout the region, including curbside composting service, work site composting, and yard waste collection · Educate residents on proper waste disposal · Assist schools in conservation practices and involve them in educational opportunities · Pursue opportunities to divert waste from landfills” | Replace bullets with: · Implement significant waste prevention measures, including supporting reuse, repair, and food rescue efforts in our communities and promoting sustainable consumption. · Divert all organics from landfill disposal, including food, yard and garden, compostable materials, and wood – and into adequately sized and sited organics processing facilities. · Ensure all residents (including multifamily) and businesses have or have access to recycling and organics collection services · Ensure collected materials are responsibly managed and become feedstock in the manufacture of new products. · Establish a circular economy approach in the region, working with the private sector to develop needed processing, sorting, and remanufacturing capacity for our recyclables and organic materials. (This includes working to bring new transformative technologies to the region to increase options for the management of difficult materials, such as plastic packaging.) Our exported waste materials must not create social and environmental harm in other countries and other communities. · Establish product stewardship systems that ensure widespread access to services and responsible management of those materials. · Ensure all community members are provided equitable services and are equitably engaged in outreach and educational efforts, including through transcreation of messages and materials. · Ensure that processed organic materials are returned to soils for the maximum carbon sequestration value. |

Environmental Justice/Service Equity

Section 5.7. Mitigation to prevent displacement are lean. While affordable housing is important other factors to support food security and pathways to financial opportunities and success should be considered. Possible language:

Promote local programs to develop and support community anchoring activities like job training and small business development programs, job search services, community gardens, food banks and community low income support service centers.

Promote planning processes and partnerships to create pathways to living wage careers.

Section 5.8. In the Significant Unavoidable Adverse Impacts, the statement, “Implementation of the mitigation measures listed in Section 5.7 and Section 4.1 of this Draft SEIS would help reduce or avoid these impacts” should be modified. Recommend removing the word “avoid” as it has not been demonstrated these actions would fully avoid the impacts.

Commenter(s):

Seattle Public Utilities, Martha Neuman

County Government

Joint letter: King County, City of Burien, City of Kent, City of Kirkland, City of Redmond, City of Shoreline, City of Seattle, City of Tukwila

Communication ID: 354786

04/29/2019

April 29, 2019

Puget Sound Regional Council

ATTN: VISION 2050 Draft SEIS Comment

1011 Western Avenue, Suite 500

Seattle, WA 98104-1035

Dear Puget Sound Regional Council:

King County is successfully implementing the region's blueprint for growth – VISION 2040. The county and cities planning under the Growth Management Act are focusing growth inside the Urban Growth Area (UGA) to create vibrant urban centers, protect natural resource lands and rural areas, and direct public investments in support of efficient land use. King County is creating a path toward a sustainable future for our communities and the people who will live there.

The central Puget Sound region must continue this foundational work into VISION 2050. Our comments on the regional growth pattern alternatives reflect this look to the future. The region faces important challenges as counties and cities work together to plan collaboratively for the 1.8 million new people and 1.2 million new jobs expected by 2050. The Draft Supplemental Environmental Impact Statement (DSEIS) analyzes the impacts of three alternative future growth patterns – Stay the Course (no action), Transit Focused Growth (ambitious investments in transit oriented development), and Reset Urban Growth (a more dispersed growth pattern). As noted below, Transit Focused Growth clearly performs better than the other alternatives across a range of outcomes that reflect the values of the region and reinforce the direction of current plans.

The preferred regional growth pattern should:

Maintain integrity of the Urban Growth Area (UGA).

Prioritize accommodating housing and jobs in cities and centers.

Build on opportunities and investments in an expanded regional transit network.

Advance racial and social equity as a cornerstone of the plan in policies and actions.

Promote a variety of housing types while addressing housing affordability for all residents, especially for those in the lowest income categories.

Reduce greenhouse gas emissions and avoid significant environmental impacts.

Maintain integrity of the Urban Growth Area

Our success planning under the state Growth Management Act continues to direct growth inside the UGA. This supports vibrant urban centers, an efficient transportation system, sustainable rural areas, and protected natural resource lands. King County believes the Transit Focused Growth alternative performs best at maintaining UGA integrity. This alternative directs more of the countywide growth into the UGA than either Stay the Course or Reset Urban Growth and results in less growth within a quarter-mile of the UGA boundary than either of the latter two patterns.

Prioritize accommodating housing and jobs in cities and centers

Directing growth to cities benefits the largest number of our residents and workers as the region efficiently uses its public infrastructure. Transit Focused Growth directs the most population growth to the Metropolitan and Core cities best situated to receive such growth; Reset Urban Growth directs growth away from those cities (less so in King County because our growth pattern is more established).

The preferred alternative, in any case, must acknowledge the challenges with providing additional school infrastructure to serve new growth. This is particularly true as new residential development is directed to cities and centers with limited land supply. As such, the preferred alternative must include proactive planning strategies to address school capacity needs where feasible school sites may not be available or where unique planning tools must be employed to facilitate school siting on constrained or nontraditional sites.

Build on opportunities and investment of an expanded transit network

VISION 2040 was approved before Sound Transit voters approved light rail extensions (ST2 and ST3), which will result in a 116-mile regional light rail system. Local transit agencies have adopted long range plans, such as Metro Connects, implementing VISION 2040 transportation components. The preferred alternative for VISION 2050 must recognize land use opportunities presented by these future regional transportation systems as they become more transit-oriented and create more opportunity for all of our communities.

The preferred growth pattern must acknowledge how both Sound Transit and local transit system expansions will guide the region into the future. Transit Focused Growth – by definition – directs the most growth to the locations closest to high capacity transit. The alternative shows a greater increase in transit trips because of King County growth locating in proximity to transit than either Reset Urban Growth or Stay the Course.

Advance racial and social equity as a cornerstone of the plan in policies and actions

As the region continues to grow, communities that are majority low-income and include Native

American/Alaska Native peoples, people of color, immigrants, refugees, and those who speak limited English will face substantial and disproportionate displacement pressure in all of the alternatives. Due to historic patterns of disinvestment and undervaluation, community-driven, place-based anti-displacement strategies must be part of VISION 2050.

VISION 2050 should mitigate against this increased displacement pressure by pursuing regional strategies and local actions that preserve and add to the region's affordable housing stock, create family-wage jobs, and ensure access to transit. Equitable outcomes can only be realized through targeted mitigation across the region. Regional and local actions must also prioritize quality of life improvements for communities most in need.

To this goal, Transit Focused Growth – with the right strategies and implementation measures –

locates the most housing and jobs closest to high capacity transit. This creates the greatest opportunity for all communities. Transit Focused Growth is the best framework for equitable growth as the region gets intentional about housing affordability and an inclusive economy.

Promote a variety of housing types while addressing housing affordability for all residents, especially for those in the lowest income categories

As the region grows, a variety of density options creates the greatest opportunity for housing affordability. Locating more housing closer to transit allows households to forego a car, which can decrease their monthly expenses. Transit Focused Growth has the greatest share of high density growth in King County, with the highest concentrations of growth closest to high capacity transit.

While high density growth is important for achieving our environmental and growth management goals, to mitigate impacts to the region's affordability, VISION 2050 should include strategies that encourage middle-density housing development. Middle density housing that provides opportunity for more affordability, entry level homeownership, and larger units suitable for families, can create much needed housing options for low and moderate income households.

Reduce greenhouse gas emissions and avoid significant environmental impacts Projected changes in the climate are likely to have widespread impacts for the region's population and a disproportionate effect on its most vulnerable residents. Reducing greenhouse gas emissions not only helps to mitigate against climate change, but will also improve air quality, particularly for populations living close to where emissions are reduced. Low income neighborhoods and those with a higher proportion of people of color tend to be in locations with significant industrial and transportation emission sources.

VISION 2050 should incorporate greenhouse gas emission reduction goals to assist the region in eliminating the disproportionate burden of such environmental impacts on majority low-income communities, Native American/Alaska Native peoples, people of color, immigrants and refugees, and those who speak limited English. The King County-Cities Climate Collaborative (K4C) has countywide greenhouse reduction goals and the Puget Sound Clean Air Agency has region-wide reduction goals. These established goals should serve as the basis for VISION 2050's greenhouse gas reduction goals.

While CO2 emissions decrease in all the alternatives, Transit Focused Growth sees the greatest reduction while Reset Urban Growth the least reduction. The Transit Focused Growth alternative

provides cumulative benefits of having a more compact development pattern rather than a sprawling form. The Transit Focused Growth alternative develops the least amount of land while the Reset Urban Growth alternative develops the most. This creates the greatest opportunity to protect our ecosystems, farmland, and forestland while establishing a sustainable rural area and vibrant urban core.

Thank you for your consideration.

Sincerely,

Dow Constantine, King County Executive

Larry Gossett, King County Council, District Two

Dave Upthegrove, King County Council, District Five

Claudia Balducci, King County Council, District Six

Jimmy Matta, Mayor, City of Burien

Austin Bell, Deputy Mayor, City of Burien

Nancy Tosta, Burien City Councilmember

Krystal Marx, Burien City Councilmember

Dana Ralph, Mayor, City of Kent

Penny Sweet, Mayor, City of Kirkland

John Marchione, Mayor, City of Redmond

Mike O'Brien, Seattle City Councilmember

Will Hall, Mayor, City of Shoreline

Keith McGlashan, Shoreline City Councilmember

Chris Roberts, Shoreline City Councilmember

Alan Ekberg, Mayor, City of Tukwila

[Commenter\(s\):](#)

City of Shoreline, City of Seattle, City of Kirkland, King County, City of Burien, City of Kent, City of Redmond, City of Tukwila, Claudi Balducci, Austin Bell, Dow Constantine, Alan Ekberg, Larry Gossett, Will Hall, John Marchione, Krystal Marx, Jimmy Matta, Keith McGlas

Kitsap County

Communication ID: 354701

04/29/2019

April 29, 2019

Josh Brown

Executive Director

Puget Sound Regional Council

1011 Western Ave, Suite 500

Seattle, WA 98104

RE: VISION 2050 Draft Supplemental Environmental Impact Statement - Kitsap County Board of Commissioners' Comments

Dear Executive Director Josh Brown,

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Statement (DSEIS) for VISION 2050. Kitsap County has reviewed the available documents including VISION 2040 and the draft alternatives for the forthcoming plan policy document.

The Puget Sound region has seen significant growth over the past ten years, much of which was inconsistent with the estimates and targets of VISION 2040. Other than Seattle, the metropolitan jurisdictions grew far slower than targeted while small cities and unincorporated areas grew faster as citizens sought cost-effective housing. Employment continued to locate primarily in the Seattle/King County area requiring extended commutes from affordable residential areas to this employment center. Transit ridership and opportunities such as light rail was developed yet traffic congestion grew at an advanced rate.

To date no clear analysis of how reality failed to meet VISION 2040's targets for most of the region and which policies were ineffective has been made available. Yet, the VISION 2050 DSEIS uses this past plan as the base for its policies and targets.

While the goals of VISION 2050 are largely sound, they will require monumental shifts in the market to achieve. With no documented success of VISION 2040's principles and absent any analysis explaining these outcomes documented in the Regional Growth Strategy background paper, "doubling-down" in VISION 2050 requires significant faith. Faith needing to be backed up not by PSRC but by member jurisdictions' policies, staff time and efforts.

VISION 2050 as guidance

In 2008, VISION 2040 was largely considered a guidance document, intended to provide an overarching framework of goals for the region. These goals are important yet in many cases very aspirational. VISION's inclusion of targets for population and employment take these aggressive goals and create obligations that are the responsibilities of the member jurisdictions not PSRC. This is often illustrated as an effort to "bend the trend" and local jurisdictions have sought to meet them to varying degrees of success. However, some of the VISION 2050 alternatives included in the DSEIS go beyond "bending" to manifestly recreating this trend. They require shifts that have no historical precedent in our region and only academic support.

As guidance, aspirational is logical and appropriate. PSRC should encourage outcomes that benefit the transportation system, environment, public health and general public. However, through the certification process, these aspirations appear and function more as regulatory requirements to local jurisdictions. Proposed growth targets such as those in Transit-Oriented Growth alternative are concerning as a regulatory requirement. Additionally, the changes or additions to VISION (e.g., growth targets, housing affordability, climate change, and public health) have regulatory agencies with their own requirements and metrics (GMA, Departments of Ecology and Health, and FEMA, for example). The transportation funding whose distribution is PSRC's primary focus is either inadequate or ineligible for use on many of these goals.

PSRC must not create obligations for local jurisdictions that are grossly aspirational while not adequately supporting them with funding or other direct assistance.

Regional geographies and their criteria

Generally, the revised regional geographies are a positive step forward for VISION. Promoting growth around high-capacity transit (HCT) in the RGS is a sound planning principle. It is this infrastructure that will be important to promoting density, accommodating growth and affecting transportation congestion.

However, sound planning principles are absent from other criteria such as the incorporated versus unincorporated distinction. To be a HCT community with an increased population target, an area must be within an urban growth area (UGA), include a future or planned HCT terminal AND be incorporated or specifically planned for incorporation or annexation. Per GMA, generally all UGAs are intended for future incorporation or annexation. Annexation law does not empower local jurisdictions to change their status regardless of a plan policy.

This distinction is arbitrary at best and punitive at worst. All UGAs must plan for urban densities and provide supporting infrastructure and services regardless of their incorporated status. They are impacted by existing or planned HCT, exactly the same as cities. They have the same growth pressures as cities. Why would we target less population to them based solely on their temporary governmental model? It will only ensure future inconsistencies between developed growth and VISION 2050.

By limiting growth potential, we relegate these UGAs to low-density residential development reducing their attractiveness for annexation by existing cities and diminishing their abilities to incorporate into financially-sustainable new cities. Additionally, PSRC will impede the county's use of GMA-mandated reasonable measures (upzones, infill development, etc.) to avoid future UGA expansions.

The existence of HCT should be the priority for targets, not arbitrary criteria unfounded by logical planning or market principles.

Alternatives and their population targets

The DSEIS includes three alternatives, two action (Transit Focused Growth and Reset Urban Growth) and one no action (Stay the Course). For the two action alternatives, Kitsap County's regional share of growth is reduced from 11% to 5%. This reduction, while the largest change of

all of the counties in VISION 2050, seems to be supported by OFM Intermediate population estimates. This reduction to 5% may be appropriate for future local planning in Kitsap but may be too little based on the issues detailed below.

The distribution of this regional growth percentage creates issues. For Kitsap, they specifically impact Silverdale and our other unincorporated UGAs. In the alternatives, Silverdale is a core city and allocated a specific population. Silverdale also includes a designated Regional Center, where significant growth is to be focused. There appears to be a disconnect in Silverdale's proposed allocation and the requirements to maintain its Center status (activity unit thresholds). Kitsap's plans can work to achieve one or the other, but not both. They will either greatly exceed the population allocation (a problem in recent certifications of other jurisdictions) or fall short of the Regional Centers criteria.

The other issue is with the Unincorporated UGA allocations, specifically Kingston and Central Kitsap. Per the RGS alternatives, Unincorporated UGAs (urban areas with no HCT terminals or not incorporated or specifically planned as such) are not to be a focus of future growth with reduced allocations to match. While Kitsap objects to these arbitrary criterion as discussed above, these allocations may create significant issues for Kitsap's current and future Countywide Planning Policy allocations and the current size and configuration of the UGAs themselves.

The PSRC targets for Kitsap's Unincorporated UGAs must accommodate the Poulsbo, Bremerton and Port Orchard associated UGAs but also the unassociated UGAs of Kingston and Central Kitsap. Kingston has a commuter service to Edmonds and passenger-only ferry service to downtown Seattle. Central Kitsap has multiple planned Bus Rapid Transit facilities in its core. Kingston and Central Kitsap will be affected by substantial growth pressures created by these HCT facilities and the grossly-limited targets will impact our ability to adequately plan for this growth. Without adequate future land or density, the benefits of these substantial HCT investments will be minimized if not negated.

It may also require the reduction of current UGA boundaries in one or more of these areas. Reductions in UGAs, which Kitsap already undertook in 2012, leads to wasted infrastructure investments for counties and special purpose districts, leaves urban developments in rural areas and generates conflict and uncertainty in future land use. Such reductions based solely on aggressive academic targets is grossly unreasonable.

As the lack of a local policy regarding the GMA-directed future of the Kingston and Central Kitsap UGAs is all that is lacking to allow an HCT Community designation for both, Kitsap County will pursue amendments to its Comprehensive Plan in 2019 to meet this requirement. These would provide some specificity about future annexation or incorporation in these communities. How this may affect VISION 2050's allocations to Kitsap will need to be discussed with PSRC staff as it progresses towards a preferred alternative.

DSEIS and its coverage of the forthcoming VISION 2050 plan policy document

The DSEIS focused solely on the RGS. While the RGS is a core component of transportation planning and requires substantial rigor in environmental review, the impacts of additions and amendments in the future plan policy document are currently uncalculated.

While not yet finalized, the Growth Management Policy Board has proposed and considered several policy amendments with impacts reaching well beyond the RGS. Enhanced goals, policies and actions regarding climate change, social equity, public health and housing affordability will likely be components of the to-be-released plan policy document. These are far-reaching goals with implications to all aspects of planning and service provision. If these are simple aspirational guidance, they may have little direct environmental impact. But, if they are to be applied to local plan certifications by PSRC thus regulatory requirements, their impacts are much larger. How or when will these impacts be assessed?

While VISION 2040 and its EIS included some references to each of these expanded initiatives, the DSEIS should cover the impacts of their expansions. If there is no impact beyond those assessed in the original EIS, how valuable will their inclusion be towards progress?

DSEIS does not explicitly allow flexibility for local circumstances in county planning.

While consistency is encouraged across member jurisdictions, a one-size-fits-all alternative may not fully consider local circumstances (a core element of the Growth Management Act). The geography, topography, development patterns, and transportation systems vary across jurisdictions, and new or revised growth targets or other data and metrics must reflect these features.

The PSRC member counties maintain a strong connection to the Seattle metropolitan area, though it cannot be the sole focus of the region. Each county creates housing, transportation, and employment

{{micro-climates" based on regional trends as well as unique qualities of the jurisdiction. Kitsap County is quite different from greater King County in terms of size, geology, population, and relationship to Puget Sound, for example. Our separation from the 1-5 corridor, peninsular nature, substantial shorelines, rolling topography, and dependence on ferry transportation make certain development intensities, employment opportunities and light rail options less feasible.

To ensure consistency with GMA and its {{bottoms up" approach to planning, VISION must include explicit allowances for flexibility where appropriate.

Military installations must be adequately considered in the VISION update

Kitsap, Pierce and Snohomish Counties have sizable military installations that impact their growth patterns. These installations have billion-dollar implications to the regional economy and their activities have impacts on key transportation corridors. While we understand the federal government is independent from our regional plans and cannot be directed growth, a failure to acknowledge these

large-scale employment and housing facilities in projections and planning discussions does a disservice to the counties in which they are located. As has been promoted in various discussions including the Regional Centers Framework and verbally supported by PSRC, these facilities must be considered commensurately to regional centers in VISION to address their similar impacts.

It is uncertain how these military installations are fully considered by the VISION DSEIS, its target setting and alternatives analysis.

Thank you again for the opportunity to provide comment on the VISION 2050 DSEIS. If you have any questions or need additional information, please contact us at [phone number] or Eric Baker, Policy Manager, at [phone number, email address].

Sincerely,

Edward E. Wolfe, Chair

cc: PSRC Growth Management Policy Board

PSRC Executive Board

PSRC Transportation Policy Board

Kitsap Regional Coordinating Council Board Rob Putaansuu, Mayor, City of Port Orchard Greg Wheeler, Mayor, City of Bremerton Becky Erickson, Mayor, City of Poulsbo

Kol Medina, Mayor, City of Bainbridge Island

Eric Baker, Policy Manager

Jeff Rimack, Community Development Director

[Commenter\(s\):](#)

Kitsap County, Eric Baker, Edward Wolfe

[Pierce County](#)

[Communication ID: 354341](#)

[04/25/2019](#)

April 23, 2019

Mr. Josh Brown

Executive Director

Puget Sound Regional Council

1011 Western Avenue, Suite 500

Seattle, WA 98104-103_5_

Re: Vision 2050 DSEIS Comments

Dear Mr. Brown:

Vision 2050 has the potential to be an effective regional growth planning document that would provide meaningful guidance to the counties and cities in the Puget Sound Region. The focus of the Draft Supplemental Environmental Impact Statement (DSEIS) for VISION 2050 is on the Regional Growth Strategy (RGS) - the desired growth pattern within the 4-county region. At the local level, the RGS serves as guidance for the establishment of 20-year population and housing

targets. These targets are incorporated into individual jurisdictions' comprehensive plans. These local targets serve as the basis for growth assumptions and identifying needed capital facility improvements to support existing and future growth. With the relationship between the RGS and local planning, this desired growth pattern must balance the larger regional objectives with one which can be reasonably achieved by all jurisdictions. While we recognize the benefits and support the desire for a growth pattern that emphasizes compact development in support of transit centers and corridors, we cannot ignore the real-world circumstances and the outside forces that cannot be controlled through local policy. This thinking provides the basis for our review of the DSEIS and resulting comments.

Identifying a Realistic Growth Alternative

We can support a preferred alternative which recognizes realistic growth expectations in unincorporated Pierce County, within both the urban and rural areas.. We cannot ignore the fact that the County's urban growth area (UGA) has been in place since 1995. Public and private investments have been made premised on continued growth within this area. The County is not going to entertain actions, i.e. down-zoning, that will significantly reduce the ability of these public and private investments being realized. Similarly, the County cannot ignore the significant number of vested projects within the UGA. The lots associated with these projects, which are outside the Tacoma Potential Annexation Area (PAA), total more than the estimated total housing units associated with two of the alternatives (Stay the Course and Transit Focused Growth).

In developing a preferred alternative, the DSEIS also must recognize that counties have limited tools in suppressing growth in the rural area. The DSEIS provides no information or analysis regarding how growth in rural areas would subside to levels consistent with the alternatives. While focusing the primary growth into urban areas is important, the preferred alternative must recognize growth that is likely to occur in rural areas, especially given the number of lots that already exist. Even if a county further down-zoned properties, the number of existing vacant lots will continue to support growth that meets the needs of the market.

Components of Stay the Course and Transit Focused Growth alternatives appear to be aspirational and may not be realistically achieved throughout the region. To achieve the RGS targets, some jurisdictions and "Geographies" within Pierce County will need to grow housing units at three times the level they have experienced at their highest level in the past 10 years. Other jurisdictions will have to take actions that would significantly restrict growth. Planning for growth at levels that is unlikely to occur will have serious environmental, transportation, public facility and utility impacts. As an example, school districts rely on local comprehensive plans to plan for school facilities. Adopting aspirational, rather than achievable growth targets, would have serious impacts.

Pierce County has requested PSRC to complete a GAP analysis showing how much historical development trends must shift to achieve the RGS for growth in population and employment. Absent this analysis and the inclusion of multicounty planning policies in the DSEIS, it must be made clear to decisionmakers what must occur for the growth allocations to be realized. As an example, while two alternatives indicate a shift in the jobs-housing balance, the DSEIS does not

indicate how it would be accomplished. The need to have more employment in the South Sound is critically important. Moving toward that goal needs to be more than a paper exercise. We need to work together to identify what steps can be taken to make a more equitable distribution of jobs a reality. This is a complex issue that revolves around such issues as wages and housing prices

at the sub-regional level, i.e. can a person afford to live where they work. In the past, some jurisdictions have commented that the allocations are about "planning" for growth; the environmental analysis is premised on achieving the RGS.

When developing the preferred alternative, the County recommends combining certain unincorporated urban areas within other Geographies. While the Tacoma PAA is within the High Transit Capacity (HTC) Communities Geography because of a Bus Rapid Transit (BRT)

route, it is logical to include other unincorporated PAAs and Potential Incorporation Areas (PIA) under the "Core" or "Cities and Towns" Geography because these areas are planned to be annexed or become an incorporated area. As an example, the unincorporated area associated with the Bonney Lake PAA should be classified under the "Cities and Towns" Geography.

The DSEIS also needs to recognize that the Stay the Course and Transit Focused Growth alternatives guide some jurisdictions in a manner that contradicts elements of the Growth Management Act (GMA). These two alternatives are premised on restricting growth within the designated urban growth areas (within cities/towns and unincorporated areas). The housing options associated with these alternatives are focused on higher density. GMA requires jurisdictions to provide housing types meeting the needs of all income levels.

Pierce County requests a preferred alternative with growth allocations between the Transit Focused Growth and Urban Growth Reset alternatives. The population growth under the Unincorporated Urban Pierce County Geography should be lower than the Urban Growth Reset, using housing capacity information from the 2014 Pierce County Buildable Lands Report as an initial cap. Our rough estimate would be a population growth of approximately 80,000 people

over the 33-year planning period. To be realistic, the rural area's population growth over this planning period should be closer to 30,000. This is premised on an annual housing growth of

325 units and a person per household (pphh) of 2.75. The above projections reflect a decrease in annual housing growth and pphh, as compared to historical trends.

Guidance through the Regional Growth Strategy

We emphasize that, regardless of which "preferred" RGS alternative is chosen, it is guidance and not a mandate. PSRC staff has repeatedly stated in various forums that Vision 2050 is intended to provide guidance and will be flexible. When asked for clarification, the remarks refer to flexibility associated with allocating growth to jurisdictions within the specific Geographies. However, there are various Geographies in which there is only one jurisdiction. We ask that PSRC to provide clarity regarding what "consistency with Vision" means. If Vision is flexible as staff has suggested in the past, then the RGS and updated Multicounty Planning Policies (MPPs) can provide more aspirational vision for the future. If the RGS and MPPs are prescriptive and

compliance is necessary for Plan certification, then Vision must be more accurate, based on actual growth, and provide actions to ensure the preferred alternative is achieved to the greatest extent possible. It cannot be both ways.

Criterion for Environmental Review

In our review of the DSEIS we have made several observations that are important to decisionmakers when formulating a preferred alternative. The County is concerned with the level of analysis and how the results are presented.

- The environmental analysis is completed at a regional level. The impacts at a county sub-regional level are not provided. It must be recognized that the regional average may not accurately reflect sub-regional impacts and benefits. Providing regional, average data disguises potentially major disparities among areas; King County is a relative outlier in many areas and likely skews the regional average. Similarly, the DSEIS should provide mitigation at a sub-regional level. It provides local jurisdictions more focused guidance in carrying out

planning based on local conditions.

- Looking closer than the colored arrows on the Summary Comparison of Alternatives Impacts (Table ES-3), a reader is provided numerical information used to determine the impact. It is notable that the difference in percentage is not significant, especially considering a margin of error factor. Yet, the DSEIS conveys that these small differences are significant. An

example of this is the "How Much the Average Person Drives" criterion.

- The way the environmental impacts are presented in Table ES-3 seems to convey that all impacts have equal weight in the selection of the preferred alternative. It is our observation that some of the criteria are not relevant or should not be considered to have the same weight. As an example, the analysis infers that multi-family is preferred over single-family specific

to "Visual Quality." This is extremely subjective. Most citizens in Pierce County would

argue that high-density multi-family developments are more visually intrusive and impactful. This is frequently voiced at our public meetings and hearings. This criterion should either

not be included or should be weighted differently at the sub-regional level.

- The DSEIS misrepresents the potential environmental impacts associated with the various housing densities. This is a result of lumping a wide range of densities together. As an example, the DSEIS defines low density as less than 12 housing units per acre. This category of density represents development that includes more than the typical single-family development. The characteristics between a 4 unit per acre single-family project is

dramatically different than an 11 unit per acre fourplex project. Consequently, the impacts would also be significantly different. The higher levels of low-density housing should not be characterized as a negative impact in Table ES-3.

- We also contend "Growth in Proximity to UGA Boundary" is not an appropriate criterion. It makes no difference where growth occurs within the designated UGA. This criterion is premised

on the notion that more development located near the UGA boundary results in higher pressure to expand it and convert rural and agricultural lands. It also assumes that it leads to higher levels of rural development. This thinking is in error. GMA provides the provisions for UGA expansion. The DSEIS cannot ignore these provisions. It should be recognized that all urban areas will continue to accommodate growth, even if the preferred alternative focuses growth within specific Geographies. Many other factors come into play related to spurring growth in the rural area. The most obvious being the desire to have a rural lifestyle, i.e. further away from neighbors, having space to grow food or have horses, or having a large shop to work on a collection of cars, or other pastimes not well suited to dense neighborhoods.

- PSRC decided to use Vision 2040 as the baseline to determine if the alternatives have positive or negative impacts. With this decision, the DSEIS is comparing the alternatives against theoretical outcomes of Vision 2040. If one looks at Appendix E and reads the Regional Growth Strategy Background Paper, it is evident that the Vision 2040 growth patterns have not been realized. To determine the impacts of the alternatives over what has occurred since the adoption of Vision 2040, you must look at real baseline data (2014 and

2017) provided in Appendix B-Supporting Data for Analysis. In most cases, all the

alternatives show an improvement over the base year. This is important information that is buried in the document and should be more upfront.

- It is unclear as to how the analysis incorporates external regional influences. Many people live and work outside the four counties. While outside the "planning" area, we cannot ignore the interaction with neighboring counties. As an example, the analysis presumes that the regional mean jobs-housing balance is an ideal ratio. The fact that people commute from Thurston, Kittitas, and Skagit counties suggests otherwise.

- It is concerning that the average travel time between Seattle and Tacoma is more than 80 minutes in all alternatives. To understand the transportation issues, we request that additional information is provided:

What is the percentage of transit versus automobiles between Seattle and Tacoma?

What happens when you take "out" the Sounder riders versus the auto or light rail riders? What are the average times per mode?

What are the travel times between areas south of Tacoma (i.e., JBLM and urban unincorporated Pierce County) and Seattle?

Update Table B-34 to show the Base Year (current) times for the same origins and destinations.

Multicounty Planning Policies

As the Multicounty Planning Policies are a significant component to Vision 2050, it is unclear why the environmental review does not include them. The DSEIS states the "...Environmental effects of the multicounty planning policies will be included in the Final SEIS." (page ES-20). This statement is confusing. What is the purpose of including the environmental review of the

policies at the end of the process when stakeholders do not have the opportunity to review and comment? This lacks in disclosure and transparency through a public process.

The DSEIS does not clearly describe the relationship between the RGS and Multicounty Planning Policies. Are the policies mitigation measures? Are they implementation measures? This relationship is important to understand as we are expected to take steps to implement Vision 2050 through Countywide Planning Policies and local plans.

The Major Military Installations Geography is not analyzed through the DSEIS. We look forward to reviewing draft policies that will recognize the importance of these areas to the Puget Sound Region and how the Region will work towards keeping them as a valuable economic and community asset.

Conclusion

Pierce County raised many of the comments described above in our March 2018 Scoping letter. We are hopeful that they will be addressed in either the FSEIS or the draft Multicounty Planning Policies. Our requests reflect the necessity to have a realistic growth pattern in Vision 2050. This, in conjunction with focused Multicounty Planning Policies, will provide for a meaningful and implementable coordinated regional growth plan to set the stage for the next 30 years.

Thank you for the opportunity to comment on the DSEIS for Vision 2050. We look forward to working with PSRC and other member jurisdictions to formulate a preferred alternative that addresses the issues raised in this letter.

Sincerely,

Bruce F. Dammeier

Pierce County Executive

Douglas G. Richardson

Chair, Pierce County Council

[Commenter\(s\):](#)

Pierce County, Bruce Dammeier, Douglas Richardson

[Snohomish County](#)

[Communication ID: 354652](#)

[04/26/2019](#)

April 24, 2019

Erika Harris, AICP

Senior Planner, SEPA Responsible Official, SEIS Project Manager

Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

RE: Snohomish County– Comments on the Draft SEIS for VISION 2050

Dear Ms. Harris,

Snohomish County appreciates the opportunity to provide feedback on the VISION update process and the Draft Supplemental Environmental Impact Statement (DSEIS). We know that adding 1.8 million more persons and 1.2 million more jobs to the region by 2050 is an immense task and we appreciate PSRC's consistent willingness to consider our comments. We look forward to continuing to work with PSRC and all of our regional partners throughout the completion of VISION 2050 and its implementation within Snohomish County through our countywide planning policies and local comprehensive planning processes.

Snohomish County recognizes the large-scale and long-term investment that the new light-rail routes represent. This transit investment together with ongoing investment in bus rapid transit, the ferry system, and expanded aviation capacity, including Snohomish County's new commercial air service at Paine Field, stands to improve the mobility of the region as we grow. For this reason, we feel the transit- focused growth alternative with some adjustments for the population distribution is the preferred option. We feel the adjustments are necessary to recognize some market factors and historical lot patterns that are unavoidable as well as to account for the expected timing and phasing of some key transit projects. As you are aware, these adjustments are supported by jurisdictions in Snohomish County as indicated in the comments submitted by Snohomish County Tomorrow in the letter dated April 29, 2019.

From the standpoint of the goals of the Growth Management Act (GMA), a 2% growth target, or approximately a maximum of 10,000 people over the next 35 years, for the rural areas may be desirable. However, that number is about what we currently experience during a typical 10-year time span. There is no doubt that limiting population growth in the rural areas would serve to better protect our natural environment and resources. However, county development regulations impose mitigation requirements and environmental protections to limit the impacts of this population growth. Furthermore, based on the historical population growth we have seen in the rural areas and the number of remaining legal, nonconforming lots we believe to be remaining, we do not believe a 2% growth target is realistic. To limit rural growth to just 2% would be a challenge, not just from a market perspective, but also from a zoning perspective. There are far too many existing, legal non-conforming and conforming vacant lots

for us to believe that population growth in the rural area will meet this 2% growth target while respecting the rights of property owners. Since Snohomish County does not support changes to rural zoning and regulations that would reduce the number of units already legally buildable in the rural areas, Snohomish County recommends an alternative that closely aligns with the transit- focused alternative but recognizes that the proposed 2% growth assignment for the rural areas is not realistic.

We propose allocating a more achievable growth share in rural areas of 6% (25,000 new residents over 35 years), which is still about 4 percentage points less than our current rural growth trends indicate. Additionally, with a reduction in rural population growth, we feel it is important to be clear on the goals and policies intended in the discussion regarding development in proximity to the UGA boundary. Adjusting the rural growth to 6%, which is closer to but still lower than historical development patterns, is possible while keeping growth targets elsewhere consistent with the transit-focused growth alternative.

Similarly, it would be a challenge to limit population growth in the unincorporated urban geography to just 3% (12,000 new residents) over the next 35 years, given that some of these areas represent sizeable development potential with existing or planned high capacity transit service. The suggested adjustment would be to make the allocation more realistic by increasing the population growth assignment to 18,000 (4%) for these areas.

We have attached a chart to this letter to provide an example of how changing the rural growth and unincorporated urban population allocations would have a minimal impact on the overall population distribution.

Additionally, in 2018 Snohomish County commissioned a Southwest Urban Growth Area (SWUGA) Boundary Planning Study. The study is analyzing existing conditions, opportunities and constraints that will inform future local planning decisions. The County requests that VISION 2050 allow for UGA boundary flexibility for changing population distribution, taking into consideration logical service and natural boundaries.

Employment Growth Distribution

Snohomish County has concerns with the proposed alternatives continuing to maintain a regional imbalance in jobs and housing. While the reset and transit-focused alternatives project a modest improvement in the balance compared to stay-the-course alternative, a 30-year plan should recognize that our regional long-term resiliency will be better served with a more sustainable balance of living-wage jobs and housing. This goes beyond a balance between the counties, as these alternatives show a decreased share of jobs allocated to outlying cities and towns compared to the existing VISION 2040. Many of these residents commute outside their communities for their livelihoods. Regional commute patterns and transportation infrastructure would benefit from residents having improved access to jobs. Our investments in light rail are not one-way; i.e. they not only go into the Seattle core, but radiate outwards and open opportunities for job growth outside the core in closer proximity to Snohomish County residents. In Snohomish County, an upward adjustment to future employment growth may be justified by recent events not studied in the DSEIS that would potentially facilitate greater interest in employers choosing sites in the Paine Field area (in response to the recent arrival of commercial airline service) and Arlington-Marysville area (in response to an anticipated designation of this area by PSRC as a regional Manufacturing/Industrial Center).

Housing

Affordable housing has become a serious issue in the region. For that reason, we find it incompatible with the housing needs of the region that moderate-density housing (the most

affordable housing option according to the DSEIS) is planned to be the smallest portion of new housing units in each of the alternatives. Moderate density housing is important as a source of more affordable, market-rate housing units to accommodate growth within UGAs. A preferred growth alternative focused around high-capacity transit should still allow jurisdictions to encourage more moderate density housing production, compared to what was modeled in the DSEIS. High-density and low-density housing tend to be the least affordable, a fact that the DSEIS acknowledges, and for that reason we should be vigilant that planning for these two housing densities to be the most prevalent does not exacerbate the regions affordable housing challenges. VISION 2050 should also recognize that market factors and consumer choice are primary drivers of population distribution. While the County's recommended VISION 2050 regional growth strategy relies on a transit focused growth alternative, local flexibility and authority must be maintained in order to respond to and anticipate actual growth patterns.

Transportation

VISION 2050 should continue and improve on VISION 2040's previous efforts to coordinate land use and transportation planning, including provision of the infrastructure necessary to realize this vision. VISION 2050 should lay the groundwork for an increased collaboration between WSDOT and the region to meet these needs and support the regional growth strategy. The Growth Management Act requires that local governments plan for transportation improvements that can adequately address the impact of the growth in their jurisdictions. But localities can only be successful if the state has also done adequate planning since in many places the state transportation network serves as the backbone of the local system. As Vision 2050 is being developed, a multicounty planning policy (MPP) should be included that encourages WSDOT to plan and prioritize funding for projects in a way that clearly show how the state system, particularly the non-freeway portion of the system, will be able to support the regional growth strategy.

By 2050, the region will have made an unprecedented investment in high capacity transit, but without the necessary infrastructure to provide access to light rail and support bus rapid transit, this investment will not achieve its desired ends. PSRC should work closely with WSDOT's Office of Urban Mobility and Access to clearly show how the state transportation system will work in a comprehensive way with the region's high capacity transit system.

The implications of the information in the 'Summary Comparison of Alternatives to Stay the Course' table (Table ES-1) could be made more apparent by discussing the impacts separately for each of the four counties. An explanation should be included as to why the impacts to the transportation system are so similar for each of the alternatives. Growth patterns have differing impacts on cost of providing infrastructure. PSRC should go further in the DSEIS by conducting a high-level analysis of expected transportation infrastructure costs associated with each alternative. The transportation impacts under some of the alternatives seem much lower than would be expected, especially for Snohomish County. Employment distribution is almost identical under each scenario, yet there is significantly more population growth in the outlying and rural areas for some alternatives. This should result in many more people having to commute further distances to work and the transit system being much less efficient

and therefore system costs higher. However, the transportation analysis shows similar impacts. Transit ridership is only estimated to improve by 2% under the “Transit Focused Growth” RGS compared to the “Reset Urban Growth” RGS, which does not seem to reflect the major differences in the population distribution.

Air, Water, and Ecosystems

We are pleased to see that VISION 2050 maintains a strong commitment to preserving and enhancing the natural beauty of the region. While the DSEIS has them as separate sections, it is critical to be clear that air and water are inherently parts of the ecosystems. The DSEIS also needs to be clear on what will affect plants, animals, or both. For instance Section 2.7.4 is unclear whether “species” is referring to plants or animals.

While we recommend the transit-focused alternative, we would like to acknowledge the fact that there are benefits in the “Reset” alternative as described in the DSEIS. For instance, section 4.6.1.2 states that older areas will see a higher level of redevelopment that will result in areas of existing impervious surface being brought up to current NPDES standards. This type of redevelopment should be encouraged when it can be done without diminishing a transit-focused development pattern. If reasonable measures are considered to enable appropriately phased growth with the development of transit corridors, these measures should find ways to capture positive environmental benefits of redevelopment such as the ones identified under the reset alternative.

Public Services and Utilities

We applaud that the DSEIS maintains a tone of encouraging coordination with all service providers – school districts, fire districts, utility purveyors, etc. We hope that the revised multicounty planning policies will also recognize the importance of coordination. Utilities and services should accompany growth versus guide growth; coordination is the optimal path to being proactive with service providers. If the transit-focused alternative is selected as the preferred alternative, the DSEIS should note that there will still be costs associated with upgrading and improving existing systems and service buildings, such as schools, in order to support the planned level of infill development and redevelopment. These costs may be more or less when compared to the cost of system expansions under the other alternatives, but are a factor to consider either way.

In closing, planning for growth at a regional level as PSRC does is a challenging task and the staff of PSRC should be proud of the work they have accomplished. I hope our comments are helpful as the DSEIS is finalized and a preferred alternative selected. With a large number of significant transit systems coming into use, the transit-focused alternative should be the preferred alternative that comes from this DSEIS with the adjustments proposed within this letter and with the support of Snohomish County Tomorrow. The issues this letter raises are meant to ensure the impacts of the growth alternatives are thoroughly assessed and the alternative selected is responsive to the facts of reality.

Thank you for the opportunity to comment in advance of determining a preferred alternative for VISION 2050. Please feel free to reach out to us with any questions or desired follow-up discussion on any of the comments found in this letter.

Sincerely,

Dave Somers

Snohomish County Executive

Terry Ryan, Chair

Snohomish County Council

Commenter(s):

Snohomish County, Terry Ryan, Dave Somers

Tacoma-Pierce County Health Department

Communication ID: 354157

04/22/2019

April 22, 2019

VISION 2050 Draft SEIS Comments

Puget Sound Regional Council (PSRC)

1011 Western Avenue, Suite 500

Seattle, WA 98104

Dear PSRC Board members and staff:

Tacoma-Pierce County Health Department currently supports the Transit Focused Growth alternative. The Vision 2050 Draft Supplemental Environmental Impact Statement shows the Transit Focused Growth alternative has the greatest potential to benefit health, social equity and climate, of the three alternatives shared so far.

Any regional growth alternative PSRC selects should:

Strengthen policies and investments to mitigate displacement.

Set realistic and achievable goals and targets, which consider existing vested development rights.

Encourage more meaningful public participation, transparency and accountability.

We recommend PSRC work with local agencies, organizations and communities to develop a small set of measures with to communicate Vision goals and progress. Communicating about shared progress would help to build support for Vision implementation throughout the region.

Finally, the Tacoma-Pierce County Board of Health adopted a resolution in 2016 to encourage the use of Health Impact Assessments with SEPA reviews. Our healthy community planning interest group of planners will submit a health and equity assessment of the growth alternatives by April 29. Please consider their proposed mitigation measures, which will apply all alternatives.

Thank you for your leadership improving the health of our communities.

Sincerely,

Anthony L-T Chen, MD, MPH

Director of Health

Commenter(s):

Tacoma-Pierce County Health Department, Anthony L-T Chen

Tacoma-Pierce County Healthy Community Planning Interest Group

Communication ID: 354457

04/25/2019

VISION 2050 DSEIS: HEALTH AND EQUITY ASSESSMENT 1

HEALTH AND EQUITY ASSESSMENT OF VISION 2050 REGIONAL GROWTH ALTERNATIVES Prepared by
TPCHD's Healthy Community Planning Interest Group April 2019

INTRODUCTION

Tacoma-Pierce County Health Department (TPCHD)'s Healthy Community Planning Interest Group¹ is a professional group comprised of some 40 planners, transportation and health professionals, and academia. It promotes healthy community planning practices and supports healthy communities in Pierce County.

The Group prepares this Health and Equity Assessment to augment PSRC's Vision 2050 Draft Supplemental Environmental Impact Statement (DSEIS) (February 2019). The Assessment provides:

- A summary of environmental impacts of the three regional growth alternatives, both in general and on the following two equity geographies:

? Low-income communities: Census tracts that are greater than 50% people with low-incomes

? Communities of color: Census tracts that are greater than 50% people of color

- Health benefits and adverse impacts; and
- Potential mitigation to address health impacts.

Relying on the assumptions and data findings of the DSEIS, the three alternatives assessed are:

- A1: Stay the Course
- A2: Transit Focused Growth
- A3: Reset Urban Growth

I. POPULATION, EMPLOYMENT, HOUSING

General and Equity Geographies Impacts

- In general, job-housing (J-H) balance improves region-wide. This assumes that the regional average of 1.0 is a “desirable target” to achieve; and that the higher the index, the more pressure for housing.
- Based on the regional average of 1.0 as a desirable target, A2 results in a better J-H balance for both types of equity geographies (communities of color and low-income communities). In particular, low-income communities benefit the most, under A2, from such balance improvement.
- However, J-H balance improvement can’t ensure reduction in commuting. From a two-career family point of view, a ratio of 1.0 potentially implies another member of a traditional household of 2.5 persons would have to commute to work. Consider fine-tuning the targets of J-H balance and persons of household projections based on different geographies.
- Commuting will continue to worsen if there’s a mismatch between the types of jobs created and the kinds of housing units produced. We should ask “Are the types of dwelling units in mixed use centers, such as in transit-oriented developments (TOD) or transit-oriented corridors (TOC), wage-affordable to those living in proximity to alternative transportation?”
- Region-wide, more affordable medium-density housing will be generated under A2, whereas there’s a drop in affordable medium-density housing under A3.
- As for equity geography impacts under A2, there’s a 1% decrease of medium density housing in low-income communities, but a 1% increase in communities of color as compared to A1.
- As documented in the PSRC Housing Report, moderate density housing tends to be more affordable as an ownership option, as compared to either low- or high-density housing. All three alternatives result in 80% or more of the future housing stock as either low – or high- density housing, which is the most expensive types of housing. However, neither did the DSEIS nor the Housing Report discuss smaller rental apartment units as an affordable housing option besides moderate density homeownership opportunities.
- Under A-2, most of the growth occurs in King County, which has the highest percentage of high-density housing (68%) and the lowest percentage of moderate-density housing (15%).
- Most of the moderate density housing to be replaced with higher density housing is currently located in low-income areas and communities of color. The new moderate density housing will be located further away from transit stations, as it will occur in the more suburban communities.
- While A-2 results in more housing near transit located in low-income areas and communities of color, the housing will be high density housing, which is less affordable. As a result, the ability for EJ populations living in proximity to transit could be reduced due to increases in housing cost.
- Rising housing cost would displace EJ populations into suburban areas, making their access to transit more difficult. This could result in an increase in reliance on vehicles, further aggravating their cost burden.
- Overall, both equity geographies see the most improvement in J-H balance under A2. Unless efforts are made to create or mandate affordable “higher density rental” apartments near transit facilities, displacement risks remain high as the moderate density homeownership possibility reduces.

Health Benefits and Impacts

- Density increase could result in increased environmental noise exposure and the loss of dark sky. This may affect our sleep by disturbing the circadian rhythm; and can cause hypertension and cardiovascular diseases.^{2 3}
- Increasing housing cost can result in an increase in the number of cost-burden households. Cost burden households experience greater food insecurity, more child poverty, and worse health outcomes.^{4 5 6}
- Commuting has a huge impact on both the physical and the mental health. The longer the driving time, the higher the odds for smoking, insufficient physical activity, short sleep, obesity, and the lesser the time for healthy practices, such as walking or meal preparation.^{7 8 9 10}
- Improvements in both J-H balance and J-H match can ease the transportation & housing cost burden, and improve the quality of life and well-being.
- J-H balance has the potential to facilitate the development of complete neighborhoods where living wage jobs can be encouraged near affordable housing. Complete neighborhoods support sustainable community health and quality of life.^{11 12}
- Housing affects one's health. There's a link among home foreclosure, stress and health. Providing affordable housing, particularly in equity geographies, can help improve health and prevent displacement.^{13 14}
- Any alternatives that benefit the health of the environmental justice (EJ) or underserved populations can improve the life expectancy of this population segment and reduce health disparities across the region.
- Displacing EJ populations could occur under any alternatives. However, it appears to be more likely along high capacity transit. This will further aggravate their health and well-being. Displacement impacts must be mitigated upfront, irrespective of alternative chosen.

Potential Mitigation to Address Health Impacts

- Use Form-based Codes (FBC) to encourage missing-middle housing.¹⁵ At the minimum, consider renaming "single-family" to "detached" housing to allow more than one family sharing a free-standing detached form of dwelling in keeping with the character of traditional neighborhoods. Such built form can easily accommodate a range of missing-middle dwellings, ranging from duplex to quadplex, if designed sensitively.
- Strengthen the Affordable Housing tools under the "Planning for the Whole Communities Toolkit" to include such tools as rental housing safety program¹⁶, housing financing, tax incentives, land value capture, and continuum of housing (including tiny homes, modular and micro-units, etc.) to meet the needs of all walks of life and foster inter-generational neighborhoods.
- Develop incentives and consider inclusionary zoning to attract the development of high-density affordable rental apartment units.
- Develop policies to ensure a healthy mix of "affordable" high-density rental and medium-density ownership housing options to meet the needs of the EJ populations and other non-traditional households.

- Consider supporting rent control initiatives to keep living costs affordable for lower-income residents.
- Displacement risk remains high for all scenarios, particularly A2. Address and prevent displacement upfront through policy intervention and community development/ mobilization strategies.
- Empower the underserved when developing centers and redeveloping neighborhoods. This can strengthen their voices, give them a sense of ownership and belongings; and create resiliency to manage/ cope with displacement.
- Explore the use of community development corporations to create affordable housing with local communities.
- Monitor J-H match by tracking the Affordable Housing Index (maintained by the Washington Center for Real Estate Research) or housing price points in relation to job wages in walkable neighborhoods along high capacity transits.
- Study how density impacts affordability, on both high-density rental and moderate-density homeownership.
- Establish affordable housing targets for regional growth centers and areas around transit centers. Targets should be verified during the comprehensive plan certification process.

II. LAND-USE

General and Equity Geographies Impacts

- Region-wide, 75% of population and employment will benefit from walkable access to high-capacity transit under A2, the largest % as compared to other alternatives.
- Besides King County, the other three counties will also have an increase in population with access to transit under A2, as compared to other alternatives. This alternative seems to be more regionally/ geographically equitable.
- A2 anticipates the most land-intensive/dense growth, thus removing the pressure for sprawling into rural and natural resource lands.
- A2 encourages TODs which makes neighborhoods more compact, walkable and complete.
- If affordable housing is provided near transit stations, this would address displacement and reduce the transportation and housing cost burden for EJ populations living in proximity to transit facilities.
- Developments in urban vs. outlying rural areas bring different visual impacts. A2 would reduce negative visual impact on rural areas, but will change the urban landscape.

Health Benefits and Impacts

- In general, there are less diabetes, and cardiovascular and respiratory diseases associated with compact cities.¹⁷
- However, loss of tree canopy as the result of development may create urban health island effect affecting health.¹⁸

- Walking and biking is the most affordable and readily accessible means to achieve physical activity guideline established by the Surgeon General (30-45 minutes of brisk physical activity per day).^{19 20 21}
- The greater the number of people walking or riding transit, the better the overall population health, both physically and socially.²²
- Transit-oriented, complete neighborhood design is the foundation for health.
- Reducing urban sprawl can address climate change and improve environmental health (less pollution).^{23 24}
- Reducing transportation cost/time burden can increase one's disposable income and fuel economic growth, besides improving health.

Potential Mitigation to Address Health Impacts

- Rather than promoting design standards, encourage the use of form-based code (FBC)²⁵ to foster predictable built results and a high-quality public realm. FBC can improve pedestrian experience in compact urban environments, and promote walkability and social interaction.
- Explore the use of performance zoning²⁶ to regulate compactible site standards and intensity and impacts of activities. Performance zoning can be used to incentivize retail services that promote health.²⁷
- Engage local residents and businesses in developing FBCs to encourage public space and streetscape that meet the needs of the current residents. (Engaging local communities early can mitigate displacement impacts).
- Infuse local arts and culture into neighborhood design to enhance a sense of identity and community.
- Encourage complete neighborhood design around high-capacity transit stations.

III. TRANSPORTATION

General and Equity Geographies Impacts

- A2 can reduce the time and distance traveled the most, and the number of hours stuck in traffic per person, as compared to other two alternatives.
- Regionally speaking, three counties, except Kitsap, will benefit more from A2.
- Under A2, both the communities of color and low-income communities will experience the largest percentage of population and employment growth close to high-capacity transit.
- A2 attracts more jobs close to transit, allowing the EJ populations lacking car-ownership to access jobs more easily.
- A2 increases the use and ridership of transit. Under this alternative, both types of equity geographies benefit most by shorter trip distances and times, the availability of more affordable modes of travel, and jobs and amenities within proximity to housing.
- Compact and high-density development in proximity to transit makes transit financially more feasible.

Health Benefits and Impacts

- Reduction in time stuck in traffic can give one more leisure time to be more physically-active and enjoy social life.
- Less reliance on cars can possibly reduce traffic accidents, injuries and deaths.
- The reduction in vehicle miles traveled can reduce greenhouse gas emissions. This not only improves environmental health, but also human health (obesity, hypertension and diabetes). Increased opportunities for walking and biking can promote both physical activity and social interaction.²⁸
- There's a disproportionate burden of air pollution exposures on EJ populations.^{29 30}
- Poverty, or financial instability, is one of the root causes of poor health. Offering alternative transportation to jobs would give EJ populations an affordable means to get to work and become more financially stable. ^{31 32 33}
- EJ populations could experience an elevated risk of displacement due to higher demand for housing near transit facilities. Displacement causing stress affects their health.

Potential Mitigation to Address Health Impacts

- Work with Pierce Transit to connect rural communities with public transit.
- Creatively provide other modes of transportation, such as transit feeder service, to major high-capacity transit stations.
- Continue pursuing ferry services between Tacoma and Seattle.
- Ensure concurrency of all modes of transportation, including parking reduction in high density areas, when development occurs.
- Assess the impacts of autonomous cars on the preferred growth scenario and the equity geographies; and consider ideas contained in Planning for Autonomous Mobility (APA 2018)³⁴.
- Explore land value capture tools to help fund high capacity transit, infrastructure, public amenities/services and affordable housing.
- Explore developing affordable housing at or near high capacity transit stations to capture improved land value.
- Develop strategies in collaboration with local communities to implement “target zero” policies.
- Mitigate transportation and displacement impacts to promote health (see displacement mitigation measures above).
- Promote biking and walking among people of color or certain cultural groups.
- Implement active transportation infrastructure, including the Regional Bicycle Network to connect on- and off-road facilities.
- Prioritize funding to improve active transportation facilities in low-income areas and areas with higher percentage of special needs populations.

IV. THE NATURAL ENVIRONMENT (AIR QUALITY, ECOSYSTEM, WATER & EARTH) AND CLIMATE CHANGE General and Equity Geographies Impacts

- In terms of air quality, A2 would have the lowest greenhouse gas emissions, whereas A3 the highest. However, compact development would create heat island effect requiring mitigation.
- As for the ecosystems, there will be a reduction in habitat quality and quantity and vegetation cover due to growth in the region. Adverse impacts would be higher if development occurs in less developed areas, such as towns, urban unincorporated areas and rural areas. From this angle, A2, which focuses development in existing urban areas, would better protect the ecosystem.
- In terms water quality and hydrology, increasing the amount of impervious areas would increase water pollutant in stormwater and the risk of flooding after heavy rainfall. A2 adds the least new impervious surface to previously undeveloped areas, as compared to other alternatives. However, Pierce County would have the largest % increase of new impervious surface. Redevelopment in areas with outdated stormwater controls could result in potential water quality benefit. A3 would have the greatest redevelopment benefits, whereas A2 the least.
- At a regional level, there's no discernable environmental health difference among three alternatives on EJ populations. However, according to UW Climate Impact Group (2018) findings³⁵, EJ populations may be more vulnerable and have reduced ability to cope with climate impacts.

Health Benefits and Impacts

- Ecosystems, biodiversity, green space, and biophilic design offer numerous qualities of life, health and well-being benefits.^{36 37 38 39 40 41 42}
- Increased noise, air and light pollution would affect our physical and mental health. EJ populations are the most affected as their incomes are worsened due to pollution impacts. In addition, they are more prone to be affected due to the lack of resources and voices to protect themselves from adverse impacts.^{43 44}

Potential Mitigation to Address Health Impacts

- Encourage biophilic urban design principles, low-impact development, urban tree canopy and green/cool roofs to mitigate air, water, micro-climate and climate change impacts.
- Address wildlife and human health impacts of urban light and noise pollution, as the result of increased development.
- Address rising sea water by prohibiting hazardous industries and essential public services to be located within 500-year flood plain.
- Provide education and resources to assist EJ populations to address and cope with climate change, site specific contamination, and other health hazards.

V. PUBLIC SERVICES, UTILITIES AND ENERGY

General and Equity Geographies Impacts

- Future growth requires service expansion in areas where growth occurs. Concentrating 75% of population growth under A2 can reduce the chance of expanding services and utilities in rural area or close to natural resource lands.
- A2 minimizes the pressure for urban sprawling and threats to rural/natural areas.
- Rather than requiring expansion or development of new infrastructure, compact development in existing service areas can keep utility and living cost down, thus benefiting the EJ populations.

Health Benefits and Impacts

- Focusing service improvements within UGAs and along transit facilities without sprawling into rural and natural lands can better preserve the ecosystem. A healthy ecosystem supports environmental health, and improves our physical and mental health.⁴⁵
- Keeping cost of living down benefits not just the low-income communities, but also the entire region, without sacrificing the overall quality of life.

Potential Mitigation to Address Health Impacts

- Direct infrastructure investments in equity geographies and underserved areas to address health disparities.
- Consider the burden of urban sprawl on people, planet and prosperity when making infrastructure investment decisions.
- Co-locate essential public services around transit facilities.
- Encourage infill and missing-middle developments within UGAs where infrastructure capacity can support additional development.
- Prioritize improving existing infrastructure where capacity exists for infill development.

VI. PARKS AND RECREATION

General and Equity Geographies Impacts

- Under A2, King, Pierce and Kitsap Counties will have more urban population growth near parks.
- Under A2, access to local parks resources would improve in low-income communities (64%) as compared to A1 (62%), and in communities of color (61%) as compared to A1 (60%).
- Although under A3, low-income communities may see the largest increase in UGA population near local parks (66%), other health impacts may outweigh this local urban park access benefit.
- Access to regional parks resources among EJ populations would remain difficult across all alternatives. They lack car ownership, disposable income to access park pass and leisure time.

Health Benefits and Impacts

- Parks and open space provide numerous physical, social, emotional and mental health benefits.⁴⁶

- Walkable access to urban green/open space, playground facilities, community gardens and trails can promote health and well-being.^{47 48}
- Biophilic city/urban design provides healing spaces for urban dwellers, particularly living in dense built environments.⁴⁹
- Access to nature benefits physical, social, emotional and mental health.⁵⁰

Potential Mitigation to Address Health Impacts

- Encourage “green streets” as places or linear parks for recreational and utilitarian purposes. Adopt form-based codes to create connected open spaces along streets to form urban linear parks for physical activity and social interaction.
- Create incentives to encourage public-private partnerships in creating connected open spaces for all ages and abilities.
- Provide urban parks, trails, play facilities, community gardens and open space in compact TODs to compensate for the loss of backyard space normally found in low-density areas.
- Provide urban parks as “breathing spaces” in concrete, high-density built environments.
- Encourage Transfer of Density Rights provisions to create public open space and preserve historic/cultural assets within urban settings to serve the needs of compact neighborhoods.
- Improve on-street and off-street trail connectivity to promote physical activity.
- Encourage green/cool roofs to mitigate the loss of backyards in compact developments for health and environmental reasons.
- As population grows and compact development trends, simply adopting a service radius level of service (LOS) for urban parks is not sufficient. Work with local jurisdictions and park agencies to develop per capita LOS for urban parks. This will help determine future parks levy, cash-in-lieu rates, and private open space dedication requirements in support of high-density living.
- Identify open space and recreation needs with the EJ populations to design “culturally-appropriate and affordable” parks and recreation programs. Consider scholarships and collaborate with health professionals to prescribe Park Rx to foster the use of parks and recreation services among the underserved.
- Empower the underserved in parks planning and design to help strengthen a sense of ownership and create resiliency to manage/cope with displacement.
- Encourage transit to serve major regional and natural open space, such as the Foothills Trails, NW Trek and Point Defiance, from major cities and towns throughout the County.
- Encourage local jurisdictions to develop natural parks, like Swan Creek Park, within or close to UGAs so that those without access to cars can still enjoy the natural environment close to home.

CONCLUDING REMARKS

Vision 2050 needs a strong, over-arching vision statement painting a bright future of our region. A shared vision yielding the 13 desired outcomes can help guide the assessment and selection of growth alternatives.

The Healthy Community Planning Interest Group recommends the following vision statement for PSRC to consider. This statement attempts to capture the triple bottom line of sustainable development as the foundation for a healthy region: “A sustainable region with ample fair opportunities to foster healthy people and communities, a vibrant economy and a livable environment”. Measurable outcomes should be developed with the community to track the region’s progress towards the shared vision.

To conclude, the Group strongly feels that the three intertwining factors--housing (affordable or unaffordable), land use (land-intensive or land-extensive) and transportation (transit-oriented or auto-dependent)—directly affect the health of our people, economy and environment. Commuting tremendously costs our economy, the environment, and particularly people’s health and social well-being.

To achieve the proposed vision for the Vision, the Group recommends a few key success ingredients:

- Build compact and complete neighborhoods with affordable housing around transit facilities.
- Strive to make housing “wage” affordable to those making a living nearby.⁵¹
- Make transit accessible to everyone, particularly the EJ and special needs populations, and those living in the fringe of UGAs.
- Address involuntary displacement upfront through rigorous policies on housing, job-housing match and community engagement; and action strategies to organize and empower local communities to be more resilient.
- Consider health and equity impacts in all planning decisions.

The Group encourages PSRC to be more accountable by:

- Considering the health benefits and adverse impacts outlined in this report when deciding on a preferred or any hybrid alternative.
- Incorporating potential mitigation measures recommended in this Assessment when updating the Multicounty Planning Policies (MPPs).
- Adopt a “health-in-all-policies” approach in updating the MPPs.

Adverse health impacts must be mitigated in order to create a sustainable, healthy and equitable region. The Group looks forward to reviewing the Multicounty Planning Policies in the coming months.

[Commenter\(s\):](#)

Tacoma-Pierce County Healthy Community Planning Interest Group, Amy Pow

Federal Government

U.S. Environmental Protection Agency

Communication ID: 354717

04/29/2019

Ms. Erika Harris, AICP

Senior Planner, SEPA Responsible Official, SEIS Project Manager

Puget Sound Regional Council 1011 Western Avenue, Suite 500

Seattle, WA 98104-1035

Dear Ms. Harris:

The U.S. Environmental Protection Agency has reviewed the VISION 2050 Draft Supplemental Environmental Impact Statement, which was produced in accordance with the Washington State Environmental Policy Act. VISION 2050 updates VISION 2040, the central Puget Sound region's long-range growth management, environmental, economic, and transportation strategy.

The VISION 2050 Draft SEIS supplements the VISION 204.0 Final EIS of 2008. VISION 2050 will contain the region's multi-county planning policies, which are required by the Washington State Growth Management Act, and a regional strategy for accommodating forecasted population and job growth through 2050. 1 The VISION 2050 update is also needed to address pressing environmental issues, such as climate change, the health of Puget Sound, and preservation of open space. To address these needs, three regional growth strategy alternatives are identified in the Draft SEIS:

- Stay the Course (No Action);2
- Transit Focused Growth;3 and
- Reset Urban Growth.4

Each alternative distributes growth in a different pattern (compact; compact/High Capacity Transit focused; more dispersed) and would result in substantially different future environmental, social, and economic outcomes.

Preferred alternative

The Draft SEIS does not identify a preferred alternative. However, the analysis in the Draft SEIS indicates that the Transit Focused Growth Alternative would produce outcomes that best respond to the Region's need to address the pressing environmental issues mentioned above, identified as the key reasons the VISION 2050 update is needed. For example, while all alternatives have similar impacts, "...the contribution of growth to climate change is inversely proportional to the compactness and density of new development."5 The Draft SEIS analysis also indicates that the Transit Focused Growth

Alternative best supports the objectives and desired outcomes identified by the Growth Management

1 Forecasts show the region needs to plan for 1.8 million additional people and 1.2 million new jobs by 2050.

2 Stay the Course (No Action) Alternative would continue the current VISION 2040 Growth Strategy: compact growth focused in Metropolitan and Core cities with regional growth centers.

3 Transit Focused Growth Alternative would have more compact growth focused in high-capacity transit areas in

Metropolitan, Core and HCT Communities, with less growth in outlying areas.

4 Reset Urban Growth Alternative would have growth more distributed throughout the urban growth area, while still assuming a large share of growth to Metropolitan and Core cities, with more growth in outlying areas.

Policy Board and the public.⁶ For these reasons, and because it will be essential to accommodate 1.8 million more people and 1.2 million more jobs in a region that is currently working to address environmental and climate challenges, we support and recommend selection of the Transit Focused Growth Alternative, which emphasizes Transit Oriented Development, as the preferred alternative.

The Draft SEIS analysis conveys that the Transit Focused Growth Alternative would substantially advance the following outcomes:

- Improved human health and safety due to increased walking and biking, reduced vehicle miles traveled and air emissions, reduced vehicle collisions, and increased access to healthy food;⁷
- Improved economic health due to lower expenses for transportation, support for affordable housing, economic benefits to centers and High Capacity Transit communities, lower municipal infrastructure costs, and reduced energy consumption;⁸
- More favorable environmental outcomes due to fewer vehicular emissions (criteria pollutants, air toxics, and greenhouse gases); conservation of farm and forest lands, recreation areas, wildlife habitat and biodiversity, open space and visual/aesthetic benefits, water quality protection, and the array of ecosystem services provided by the natural environment, enabled by having less sprawl/dispersed development;⁹
- Increased convenience and efficiency of the transportation system;¹⁰ and
- Improved human physical and mental well-being from all the above.¹¹

As for the other alternatives analyzed in the Draft SEIS, while the Stay the Course (No Action) Alternative would continue to implement VISION, our review finds that it would not do so with the level of rigor needed to accommodate the projected population and employment growth, particularly with advancing climatic changes, diminishing natural habitats, species, and resource lands. With development pressures placing increasing demands upon the natural and built environment, we recommend that additional strategies are needed to protect and restore environmental health, recover declining habitats and species, and advance equity and human well-being.

In addition, the Draft SEIS analysis conveys ¹² that the Reset Urban Growth Alternative, which favors more dispersed development in outlying areas, would result in outcomes that would substantially

retreat from, rather than advance, progress toward achieving the regional VISION and goals of the Washington State Growth Management Act. The Reset Urban Growth Alternative would not accommodate the projected population and employment growth in an environmentally protective or sustainable manner because it would:

- Develop the most land (331,000 acres as compared to 285,000 acres with the Transit Focused Growth Alternative);
- Result in the least population and employment growth near high-capacity transit (44% as compared to 75%);

6 Draft SEIS, pages 4-5. Desired outcomes identified by the Growth Management Policy Board and the public during the scoping process pertain to climate, environment, equity, health, housing, mobility and connectivity, natural resources, public facilities and services, resilience, and rural areas.

7 VISION 2050 Draft SEIS, p. 30

8 VISION 2050 Draft SEIS, p. 30

9 VISION 2050 Draft SEIS, p. 30

10 VISION 2050 Draft SEIS, p. 37

11 VISION 2050 Draft SEIS, p. 63

12 VISION 2050 Draft SEIS, Table ES-3

- Increase the average time stuck in traffic each year (32 hours as compared to 29 hours);
- Reduce the number of jobs accessible by transit, walking, and biking (vs. an increased number with the Transit Focused Growth Alternative);
- Increase greenhouse gas emissions (vs. decreased GHG emissions with the Transit Focused Growth Alternative);
- Increase growth to areas with regionally significant habitat (vs. lessened growth to these areas);
- Result in the highest addition of impervious surface to the region (24,300 acres as compared to 19,600 acres);
- Increase the need to construct or expand infrastructure in areas not currently served (vs. less growth in outlying and rural areas);
- Result in more development and negative impacts to outlying and rural areas (vs. less development in these areas); and
- Reduce proximity to high capacity transit for communities of color and low-income communities (vs. providing greater proximity to high capacity transit for these communities with the Transit Focused Growth Alternative).

Mitigation measures

The Draft SEIS contains many helpful mitigation measures to guide and shape implementation of the adopted growth alternative to achieve desired outcomes. We recommend that combining the measures to "Conduct community participation and visioning exercises to help guide planning, development, and investments," and "Integrate environmental review and mitigation into the subarea planning process," could help increase the ability to achieve equitable, sustainable, and context sensitive outcomes.

We also recommend that the mitigation measures from VISION 2040 be reviewed for possible updates that may be needed. We further recommend that PSRC conduct periodic reviews of the mitigation measures to continually refine, strengthen, and adapt them to support VISION.

Thank you for the opportunity to review the VISION 2050 Draft SEIS. If you have questions about our comments, please contact my staff, Elaine Somers at [phone number, email address]., or you may contact me at [phone number, email address].

Sincerely,

Jill A. Nogi, Chief

Policy and Environmental Review Branch

Commenter(s):

Environmental Protection Agency, Jill Nogi, Elaine Somers

Organizations

350 Seattle

Communication ID: 354406

04/26/2019

Dear PSRC,

Thank you for giving us the opportunity to comment on Vision 2050: Draft Supplemental Environmental Impact Statement (DSEIS). 350 Seattle works toward climate justice by organizing people to make deep system change: resisting fossil fuels; building momentum for healthy alternatives; and fostering resilient, just, and welcoming communities. We urge you to consider how long-range planning can be a positive force in the fight to contain climate change.

First, before addressing climate issues, please know that we welcome PSRC's renewed focus on equity planning — in particular we appreciate the 20-page section on Environmental Justice and its analysis of displacement risk and transportation equity. It is very dismaying to us however, that PSRC seems to have little focus on the other great challenge of the coming decades: climate change. In fact, based on the DSEIS, it seems that PSRC currently has no viable plan to aid our region in responding to the climate catastrophe we face. Here are some suggestions that would remedy the situation

Please address the full range of climate change impacts on human communities in this DSEIS.

The DSEIS barely touches on climate change impacts on human communities. Apart from a discussion on sea-level rise impacts on coastal communities, the document fails to make a clear link between climate change and its many significant impacts on communities, including reduced summer water resources, heat waves and health effects, changes to our agricultural systems, reduced air quality from wildfires, and the increasing spread of infectious disease. These are strange omission for two reasons; first, the University of Washington's Climate Impacts Group, a local authority, has identified these and other impacts to local communities (see here). Second, climate change is widely expected to have disproportionate impacts on traditionally disadvantaged communities, and given PSRC's emphasis on equity, this document should be laser-focused on addressing what is rapidly becoming the largest environmental justice issue on the planet.

2. Please cite IPCC research on how quickly we need to reduce our GHG emissions to avoid climate catastrophe.

The DSEIS completely ignores the essential question of how quickly we need to reduce our GHG emissions. In October, there was a well publicized report from the Intergovernmental Panel on Climate Change (IPCC), that stated that the international community had only 12 years to reduce our emissions by 45% in order to avoid widespread catastrophe (see here). And the EPA has made it increasingly clear that patterns of urban development play a key role in the effort to limit GHGs (see here). Significant development factors include: the compactness of communities, the transportation infrastructure we provide, the energy efficiency of the structures we construct, and the sequestration of CO₂ through forest and open space management. The DSEIS should link all of these factors to the need to reduce GHG emissions.

3. Please compare each alternative's projected GHG levels with the level identified by the IPCC as necessary to avert the worst climate change catastrophe.

The DSEIS does report on the future greenhouse gas emissions of the three future growth alternatives it considers, but fails to include information on how utterly inadequate these alternatives are to meeting the GHG reduction level identified by IPCC. In analysing the three alternatives, the DSEIS states that under the "stay the course" alternative, CO₂e would drop from 47000 metric tons per day in 2014 to 41,000 in 2050 (a drop of about 13%), and under the "reset urban growth" alternative, it would drop to 41,400 in 2050 (a drop of about 12%). Under the transit-focused growth alternative, it would drop to 39,600 in 2050 (a drop of about 16%). None of these declines are remotely enough! The extent to which they are inadequate needs to be specifically identified in the DSEIS.

4. Please include an additional alternative that is designed to achieve the level of GHG reduction that the IPCC identifies as needed to avert the worst climate change catastrophe.

The DSEIS should also include at least one alternative that actually meets the needed GHG reduction targets. Compared to the alternatives you have selected, this alternative would need to have more compact mixed-use development, more transit and active transportation infrastructure, and less general purpose traffic right of way. This alternative would need to impose higher standards of energy efficiency for buildings. It would also need to include open space and forest management practices that promote quantifiable carbon sequestration. In identifying this alternative, PSRC needs to identify the right combination of regional policies so that overall the alternative would reduce our emissions to the level required to avert climate catastrophe.

5. Please include more information on how our communities can adapt to the climate change impacts we know are coming.

There is virtually nothing in the DSEIS about how communities will adapt to the climate impacts that are already here, and bound to grow more problematic in future -- these include worsening heat waves and poor air quality from smokey skies, the increased likelihood of disease vectors, heavier rainfall events, floods, and sea level rise.

6. Please prioritize climate change by leading with a substantial new section in the DSEIS entirely devoted to policies fostering rapid GHG reduction and climate change adaptation.

If we do not undertake a rapid and massive mobilization to change our carbon-based economy to a sustainable energy system, climate change will lead to mass extinctions, countless waves of climate refugees, raging epidemics, destruction of coastal cities and towns, the burning of our planet's forests, and other catastrophes. Taking action is imperative — and we, here in the U.S.A., have the responsibility to lead the way and reduce GHGs as fast as possible, given that we are responsible for well over half of historical emissions.

PSRC planners have a unique and important role to play in the struggle to contain the worst impacts of climate change. Your plans are foundational to the effort to actually meet our GHG reduction targets, and ultimately to our ability to adapt to this challenging future. A focus on mitigating GHGs and adapting to climate change should be your North Star. Mitigation of GHGs and adaptation to climate change must be principle organizing topics in the DSEIS.

Thank you for your attention.

Sincerely,

Andrew Kidde

Meg Wade

Alice Lockhart

Emily Johnston

350 Seattle

[Commenter\(s\):](#)

350 Seattle, Emily Johnston, Andrew Kidde, Alice Lockhart, Meg Wade

Climate Solutions

Communication ID: 354850

04/29/2019

April 29, 2019

To whom it may concern:

Climate Solutions appreciates the opportunity to provide comments on the Draft Supplemental Environmental Impact Statement for Vision 2050. As our region continues to grow, we have the opportunity to plan and ensure that this growth is sustainable and equitable. Climate Solutions is a clean energy nonprofit organization working to accelerate clean energy solutions to the climate crisis. The Northwest has emerged as a center of climate action, and Climate Solutions is at the center of the movement as a catalyst, advocate, and campaign hub. For 20 years, we have cultivated political leadership in the Northwest under the proposition that clean energy and broadly-shared economic prosperity go hand-in-hand, building a powerful constituency for local, regional, and state action on climate and clean energy.

The transportation sector is responsible for the largest share of Washington's greenhouse gas emissions and other toxic pollutants, making this sector a critical part of addressing the climate change and air quality in Washington, and ensuring the Puget Sound Region is a healthy, sustainable region in which to live.

Vision 2050 is a basis for this critical planning. Therefore, we offer the following comments on the SEIS in the hopes that the final SEIS will even more comprehensively assess climate and equity impacts and how they interact.

Our strong preference for a preferred alternative is the Transit Oriented Growth alternative, as it performs better than the others in most measures, and in particular, it decreases greenhouse gas emissions compared to Stay the Course. However, this alternative is still inadequate when it comes to our region addressing the climate crisis and we would like to see this alternative expanded, and more measures included, to further mitigate climate change—and the inequitable impacts that follow.

Under the Transit Oriented Growth alternative, emissions are projected to be 39,000 tons per day of CO₂e. Though this is a 17% decrease from the emissions that would occur under the Stay the Course alternative, this is insufficient. Though the SEIS references the regional targets set by Puget Sound Clean Air Agency and the state of Washington's statutory emissions reductions requirements, it does not explicitly outline how the different alternatives compare to these emissions reductions pathways. Further, the Washington Department of Ecology has recommended adjusting the current state limits to an 80% reduction below 1990 emissions by 2050 as determined by the most recent science (Washington Department of Ecology, Publication no. 16-01-010), a level consistent with California and Oregon along with many other peer jurisdictions globally.

Since climate change is listed as a key change and challenge to build on from Visions 2040, the SEIS must adequately address both mitigating climate change and its impacts that interface with other issues covered in the SEIS. Since the alternatives listed in the SEIS reduce greenhouse gas emissions compared to Stay the Course, mitigations are not technically required. However, climate change mitigations should be considered and listed in the SEIS. In addition, Stay the Course is not an adequate baseline by which to measure emissions reductions—the baseline should be the emissions reductions that are required to limit warming to 1.5 degrees Celsius.

The greenhouse gas emissions attributable to the Transit Oriented Growth alternative, according to the SEIS, are largely a result of decreasing vehicle miles traveled. Given this, it is important to examine how transportation modes are analyzed and the mitigation actions associated with reducing negative transportation impacts.

Jobs accessible by transit is defined in the SEIS as a 45-minute long trip or less. Jobs accessible by walking and biking are within one mile or three miles, respectively. However, these definitions do not encompass one of the primary barriers to these modes of transportation, which is safety. Not feeling safe is the most commonly cited reason people in the City of Seattle choose not to bike (SDOT Bicycle Participation Phone Survey of Seattle, 2013). Thus, estimating job accessibility solely by distance will likely underestimate the amount of people who will actually choose to walk or bike.

We encourage the Final SEIS to incorporate safety into its definition of jobs accessible by walking or biking. In addition, safer infrastructure for active transportation methods should be listed under the general transportation mitigation measures. Making walking and biking safer is an issue of environmental justice—people of color and lower income people are more likely to be regular bicycle riders and are also more likely to be seriously injured or killed while walking or biking (People for Bikes, “Building Equity,” 2015; WSDOT Gray Notebook, March 2018). Incorporating mitigation measures that promote active transportation and make these modes safer will both help Vision 2050 be more equitable and more sustainable.

Promoting Orca Lift is a mitigation measure listed in the SEIS that we support, and we would like SEIS to go further by promoting its expansion to cover first and last mile options that include non-vehicle transportation. Currently, only vehicle providers (Uber, Lyft, Car2Go, and ReachNow) are listed as shared mobility providers with whom cooperation is encouraged. This should be expanded to include bike and scooter shares such as Jump and Lime, and to encourage Orca card use and the associated discount programs across these modes.

The Transit Oriented Growth alternative does carry a heightened risk of displacement. Not only is displacement socially disruptive and inequitable, but it also brings with it negative climate impacts from sprawl and greater distances traveled, and in turn, climate change is not equally felt across communities. We appreciate the related mitigation measures listed for Environmental Justice, and we encourage you to evaluate additional measures regarding displacement, and to be more specific about those listed.

The Energy analysis in the SEIS should be updated to reflect Washington’s new trajectory: By 2050, Washington’s electricity grid will be 100% clean. In addition, transportation electrification is occurring rapidly, and under the Clean Buildings for Washington Act, natural gas efficiency standards will improve. Relying on national consumption projections from the U.S. Energy Information Administration likely does not reflect what will happen in Washington State. Additionally, “promote alternative energy sources” is a listed mitigation measure. This definition is open to interpretation. We would suggest “energy sources that do not emit greenhouse gases.”

Thank you again for the opportunity to provide comments on the Draft Supplemental Environmental Impact Statement for Vision 2050. Vision 2050 will help guide the growth of our region and thus the SEIS should include an alternative that will lead to greater greenhouse gas emissions reductions, while improving transportation choices and access to opportunity to all in our region.

Thank you for your work and for considering our comments,

Leah Missik

Washington Transportation Policy Manager

Climate Solutions

Commenter(s):

Climate Solutions, Leah Missik

Joint letter: Emerald Alliance, Transportation Choices Coalition, Mountains to Sound Greenway, Trust for Public Land, Conservation Northwest, SMWatts Consulting LLC

Communication ID: 354658

04/29/2019

To: PSRC

From: Emerald Alliance for People, Nature and Community Partners

RE: Draft SEIS on current growth alternatives for VISION 2050

Date: April 29, 2019

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Statement for VISION 2050. The Emerald Alliance, on behalf of the undersigned partners, strongly supports a final Growth Plan that prioritizes and internalizes the foundational value of the region's natural infrastructure and systems as core to ensuring the sustainability of its communities, environment and economy. The region cannot afford to lose more ground—literally—as it absorbs the expected growth over the coming three decades. As described in your own Regional Open Space Conservation Plan (ROSCP), failure to prioritize the protection of the 3 million acre regional open space network, especially the 463,000 acres of at-risk open space, renders the prospect of sustainably guiding growth all but impossible. As important, are considerations of the beneficiaries of this sustainable growth.

As PSRC considers comments and moves to choosing a preferred growth alternative, we ask members of the Growth Management Policy Board to:

Evaluate strategies for accommodating growth through a people-forward lens at the intersection of human health, equity and inclusion, access to nature, economic resiliency and environmental quality and justice.

Double down on anti-displacement and create real actions, backed up by dedicated sources of funding, that mitigate for the negative impacts of growth in historically underserved communities and in communities where concentrated growth is expected to exacerbate the current trend of displacement (such as in the overall preferred Transit Focused Growth Alternative).

Adopt more inclusive community engagement strategies to ensure that all voices are heard as the region considers how and where growth will be accommodated and who benefits from that future growth.

Consider the creation of a Growth Equity Cabinet, following the model set by King County's Land Conservation Initiative, Equity Cabinet. This regional body can work to ensure that the Multicounty

Planning Policies are in line with overarching goals of diversity, equity and inclusion, especially in the allocation of funding to improve access to open space, or nearby nature (that within a 10 minutes walk from home).

Align the final Growth Plan with the Regional Open Space Conservation Plan with a specific call out to the ten strategies for accelerating the protection of open space (see chapter 6: Conservation Action Plan).

Support Multicounty Planning Policies (MPP) that scale up and accelerate the conservation of the 463,000 acres of at-risk open space across the region. Once lost, these acres cannot be recovered or replaced and their loss compromises the region's ability to adapt to the impacts from changes in climate patterns and further exacerbates environmental degradation, displacement and income inequality.

Build tangible accountability measures into the Plan's policies and actions that extend to the MPP such that they provide irresistible incentives and effective disincentives for the impacts of policies in local jurisdictions.

Of particular interest in the growth alternative chosen, we prioritize the alternative that maximizes the following priorities:

- Focus growth in existing urban growth areas and away from unincorporated rural areas. This protects rural natural landscapes from conversion to impervious surface, vital natural resource lands, and minimizes the impacts of new growth on receiving tributaries to Puget Sound.
- Furthermore, focus growth in Metropolitan Cities, Core Cities and High-Capacity Transit Communities. This maximizes the use of high-capacity transit which lessens the overall footprint of growth in terms of:
 - o minimizing the addition of impervious surface and polluted runoff into receiving surface water;
 - o reducing car dependency;
 - o lowering vehicle miles traveled per capita;
 - o lowering GhG emissions and other pollutants that cause poor air quality;
 - o improving the jobs/housing ratio;
 - o lowering the need and thus the financial burden of expanding public services in rural, less densely populated areas.
- Recognition of the impacts of displacement, which drives people in search of affordable housing further away from designated growth centers, undermining intentional growth patterns and the conservation and protection of open spaces and otherwise rural, natural landscapes. Therefore, we make the above recommendations with the caveat that VISION 2050 must:
 - o articulate specific policies with actions and dedicated funding that addresses truly affordable housing and aggressively mitigates against displacement of residents and businesses.
 - o invest in the capacity of communities to engage deeply in long range planning to ensure that the policies recommended reduce, rather than exacerbate inequities across central Puget Sound.

The Emerald Alliance looks forward to working with PSRC as Vision2050 moves forward toward finalizing a growth plan for the future.

Sincerely,

Tracy Stanton

Executive Director

Partners signing on in support of this letter:

Amy Brockhaus, Mountains to Sound Greenway Trust

Kitty Craig, The Wilderness Society

Hester Serebrin, Transportation Choices Coalition

Cary Simmons, The Trust for Public Land

Mitch Friedman, Conservation Northwest

Sean M. Watts, SMWatts Consulting, LLC

[Commenter\(s\):](#)

Emerald Alliance, Transportation Choices Coalition, Mountains to Sound Greenway, Trust for Public Land, Conservation Northwest, SMWatts Consulting LLC, Amy Brockhaus, Kitty Craig, Mitch Friedman, Cary Simmons, Tracy Stanton, Sean Watts

[Joint letter: Seattle Public Schools, Puget Sound Sage, The Wilderness Society, Climate Solutions, Sierra Club Washington, Transportation Choices Coalition, Futurewise, Cascade Bicycle Club, Housing Development Consortium](#)

[Communication ID: 354842](#)

[04/29/2019](#)

To whom it may concern:

Thank you for the opportunity to comment on the DEIS for Vision 2050. Collectively our groups are looking to Vision 2050 and its supporting analysis to lead with racial and social equity; to emphasize policies on health, equity, and the environment; to focus on action items and implementation of VISION; and to use specific targets and performance metrics to measure success and add accountability. With that frame in mind, we offer the following comments.

General comments

Of the Regional Growth Strategies studied, we prefer the transit focused growth alternative, as it performs best in measures of environment, health, and access to opportunity.

Unfortunately, all three fall short of what the region needs to attain by 2050 to minimize the impacts of adding 1.8 million people (and 1.2 million new jobs) to our region's natural and social

ecosystems. We face a considerable challenge dealing with such growth including increased development, reduction in land cover, more transportation infrastructure, decreased habitats, health disparities, various and sustained impacts from climate change, and ongoing displacement of people of color and people with low incomes.

We also know that growth in certain areas poses a higher risk of displacement, and that we are also currently unable to model such displacement. Given that if we fail to effectively prevent displacement, we will not only disrupt communities, but fail to meet our climate goals as people are pushed further beyond the reach of good transit service, it is critical to mandate anti-displacement measures as part of this - or any - scenario.

While we understand the difficulty in projecting where people of color and low-income people will live in 2050, we believe that given known trends of displacement that to assume these demographics will stay in place and benefit from the investments that come to their communities paints an unrealistic picture of outcomes, not only for the direct benefits to these communities but to larger goals around reducing VMT and GHG emissions, which will likely instead go up as communities are pushed further from urban areas with good transportation infrastructure and services.

PSRC should try applying national displacement trend analysis, and/or find some way of qualitatively telling the story of what could happen under different scenarios if demographics do not remain in place and if people are displaced. An estimate or wide range of outcomes would help us make a plan for mitigation that could address problems as they arise.

Because of the limitations of the strategies, mitigation is more important than ever. This intrinsic tension between the largely inevitable growth and its impacts, the role of PSRC in determining a growth strategy, and the role of local jurisdictions in upholding policies and mitigation means that we must collectively commit through actions, structural changes, eligibility requirements, targets, and other incentives in order to make progress.

Direct funding to mitigate displacement and other undesirable impacts on environmental justice communities is also a key and universal approach that should be explored. PSRC should explore identifying funding that can help people financially to stay in place or to return to their communities, whether through rent control or direct subsidies. Using the City of Seattle's Equitable Development Fund as a model, PSRC could fund organizations doing anti-displacement work around the region to develop locally-appropriate and community-driven solutions.

Name race, define equity, and develop a more nuanced definition of environmental justice (EJ) for use in analysis.

Demographic characteristics of residents don't, of themselves, define environmental justice. Population characteristics married with a spatial environmental benefit/burden depiction point to geographies of concern and provide the backdrop to consider how alternatives can be comparatively 'seen' and optimized to counter and reverse environmental injustices. As described below, analysis should include statewide mapping on EJ disparities that has already been done.

Help the audience understand not only the incremental change, but the baseline and total impact in each performance area.

We suggest for each outcome (e.g. air quality, access to opportunity, etc), including total and disaggregated data for baseline, incremental change (across each RGS), end result (across each RGS), and any relevant targets for that outcome (e.g., regional GHG emissions targets).

This has implications for how we understand the measures necessary not only to meet regional environmental targets, but also blurs our understanding of ongoing reality that communities of color, low-income communities, refugees, immigrants, and indigenous communities are already living with disproportionate harm and adverse effects from historic and ongoing systemic oppression.

Identify structural mitigation and accountability measures.

An equity cabinet or environmental justice committee would be able to provide guidance and help in ensuring action and implementation of mitigation strategies broadly across categories.

Community engagement and participation strategies should be constantly re-evaluated to ensure we are connecting with the most underrepresented groups that experience the most dire outcomes from the built environment, to ensure we understand their concerns and co-create solutions. Outreach should be in multiple languages and specific outreach should be done with communities at high risk of displacement.

Define affordable housing

Ensure that mitigation that recommends the creation of affordable housing is prescriptive enough to meet the lowest-income residents and allow them to stay in place.

Additional comments in specific policy areas are found in the chart below. Sincerely,

Transportation Choices Coalition

The Wilderness Society

Cascade Bicycle Club

Futurewise

Housing Development Consortium

Seattle Public Schools

Sierra Club WA

Climate Solutions

Puget Sound Sage

| DEIS questions > Policy area V | Does this element sufficiently tackle race and social equity? | Is the DEIS analysis of circumstances and impacts correct? What's missing? | What benefits do we want to emphasize? What disproportionate burdens do we want to avoid? | Mitigation -What is good or insufficient? What's missing? | Accountability - How can we focus on action and implementation? | Accountability- How can we use targets, performance measures, and consequences? |

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| Projected benefits to EJ populations | We appreciate that the outcomes for the Vision 2050 EIS are disaggregated by these historically marginalized groups to understand disproportionate outcomes between them and dominant groups. | While we understand the difficulty in projecting where people of color and low-income people will live in 2050, we believe that given known trends of displacement that to assume these demographics will stay in place and benefit from the investments that come to their communities paints an unrealistic picture of outcomes, not only for the direct benefits to these communities but to larger goals around VMT and GHG emissions, which will likely go up as communities are pushed further from urban areas with good transportation infrastructure and service. -PSRC should try applying national displacement trend analysis and/or find some way of qualitatively telling the story of what could happen under different scenarios if demographics do not remain frozen in place and if people are displaced. An estimate or wide range of outcomes would help us make a plan for mitigation that could address problems as they arise. | We not only do not want to exacerbate the suburbanization of poverty, but want to understand existing disparities and use the growth strategy and related policies to proactively improve outcomes for people of color and low-income folks, with regard to health, safety, access to opportunity, and more. | Given that the analysis shows that POC and people with low incomes will not disproportionately be impacted, and will benefit from access to transit therefore does not include mitigation for what happens if they are indeed displaced. Without mitigating and addressing displacement and gentrification, investments will harm, as opposed to benefit, communities of color and low-income communities. Jobs do not benefit people of color and low-income communities unless targeted local hire, women, and minority hire; job ladders; community-benefits agreements; and training and accessibility is built into job programs. | PSRC should conduct historical research to understand displacement trends so that this work can be incorporated into modeling, and begin to track where people are being displaced to, providing information on how to address displacement and plan for subsequent transit needs. | Set affordability and anti-displacement targets across the region. |

| DEIS questions > Policy area V | Does this element sufficiently tackle race and social equity? | Is the DEIS analysis of circumstances and impacts correct? What's missing? | What benefits do we want to emphasize? What disproportionate burdens do we want to avoid? | Mitigation - What is good or insufficient? What's missing? | Accountability - How can we focus on action and implementation? | Accountability - How can we use targets, performance measures, and consequences? |

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| Climate equity | Equity is and should be named a climate strategy - Show the footprint of fossil fuel burning today | What are equity impacts of different climate strategies? Could analyze how Areas of Potential Inundation relate to resident demographics | Putting climate resiliency resources to where needs are greatest, based on statewide environmental justice maps. | Low income housing proximal to transit, active transportation, jobs, and environmental amenities. | Track who benefits from the strategies and tactics on emissions reduction and resiliency investments. | Track that emissions reduction benefits are favoring those whose needs are greatest. Track and report on CC vulnerabilities reducing for priority populations. |

| Climate | There is very little in depth discussion about how climate change is and will continue to have disparate impacts on different demographics, including explanation of what those are and proactively how we should be growing to mitigate that. | Suggest mapping disparate climate change burdens, impacts, and vulnerabilities. Show PM2.5 and PM10 'maintenance areas'. Define how scenarios vary in benefits to wealthier and whiter neighborhoods | | Adaptive management approach - if/when risks/vulnerabilities are identified as inequitable, we may need to adjust our strategy as we go. | Track PM2.5 and PM10 'maintenance areas' to identify whether they becoming less inequitable, or trigger corrective action (e.g., ineligible for funds). |

| Climate | | Does not include analysis of targets or ability to get toward regional targets. Mentions WA statutory targets - should also mention the updates Ecology recommends so we adhere to the latest climate science | We need climate targets - need to reference PSCAA targets. What are the levers we can move in Vision to actually get to those targets? | How would we need to change our growth strategy and which actions would we need in Vision? - Needs to be holistic and equitable - and focused on large scale, use health disparities map (see link below) | What transportation investments do we need to make to meet GHG goals? How do we need to adjust our investment framework to meet them? | Track regional and local reduction targets, and determine how we can hold ourselves accountable, whether through comprehensive plan certification or limiting transportation funds to only projects or jurisdictions that are reducing GHG. |

| Climate - energy use | | What is energy use of these different growth strategies and of different types of housing? (SFZ, multi-family, new vs. old buildings) | | | |

| DEIS questions > Policy area V | Does this element sufficiently tackle race and social equity? | Is the DEIS analysis of circumstances and impacts correct? What's missing? | What benefits do we want to emphasize? What disproportionate burdens do we want to avoid? | Mitigation - What is good or insufficient? What's missing? | Accountability - How can we focus on action and implementation? | Accountability - How can we use targets, performance measures, and consequences? |

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| Affordable housing | Analysis of affordable housing really needs to be addressed from the point of view of families who need this type of housing most | One concern is "affordable rents" are set by the 30-60% AMI. As income levels are sure to rise in the city/region, the type of resident applying for and opting into this type of housing will vary with time. For example, Seattle's Central District is a hub/urban village where population will increase, transportation improvements will be made, and rents will be set to market rate if not a bit higher. The terms "Affordability" and "Affordable Housing" as they relate to individual jurisdictions and Puget Sound regionally should clearly and plainly be called out in the Vision 2050 DEIS. | | Affordability gaps persist for those with the lowest incomes (families and individuals) and now extend to middle income families. What are the plans to make housing affordable to middle income families and individuals? | | Regionally set affordability targets for local jurisdictions. |

| Affordable housing | Ensure these units go primarily in 'high access and opportunity zones' to reduce displacement in high displacement risk areas and to give historically disadvantaged populations better access to services, etc. | Advance in part through housing type diversity. | Emphasize RGS features that improve access to opportunity | For major transportation projects, they might land bank construction

siting areas to convert affordable housing. | Set targets by % in high opportunity geographies. | Create escalator clauses that ratchet leverage on cities if they are not hitting inclusion targets. |

| Affordable housing | Identifies growth in areas with a high risk of displacement, but does not model displacement | Identifies number of affordable housing units needed to meet demand. | | Using affordable targets across the region, each city needs to plan for their "fair share". | | If folks do not hit targets for affordability in their zoning/growth, comprehensive plan certification could be revoked. |

| DEIS questions > Policy area V | Does this element sufficiently tackle race and social equity? | Is the DEIS analysis of circumstances and impacts correct? What's missing? | What benefits do we want to emphasize? What disproportionate burdens do we want to avoid? | Mitigation - What is good or insufficient? What's missing? | Accountability - How can we focus on action and implementation? | Accountability - How can we use targets, performance measures, and consequences? |

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| Housing density | Are we providing sufficient housing access in medium density, high opportunity areas, and in areas with a low risk of displacement to people of all incomes? | In addition to the .5 mile, that we should be modelling medium density (e.g., triplexes, rowhouses, fourplexes) at least within a .75 of rail. We need to understand the impacts to access to opportunity, affordability, and environmental impacts of concentrating more growth in these areas compared to other non-HCT areas. | We want to emphasize the benefits of density without being one extreme or the other (maximum density around HCT vs. rural growth). We want to maximize infill development. | 2050 ideas and plans around housing density need to be aligned with the cities' plans and their understanding of how urban villages will be supported/built out. We should create structures to ensure that coordination is happening between planning departments. | | |

| Transportation - commute times | Transportation access to jobs is disaggregated by race and income, but doesn't capture the true story. Doesn't look at vehicle pollution disparities. Transportation focus looks at modes and multi-modal trips. Considering mobility inequities may better reveal variations. | "Communities with higher concentrations of people with low incomes and people of color generally have access to more jobs within 45 minutes of transit, a 1-mile walk, or a 3-mile bike trip than the rest of the population." --> Can we correlate this with actual travel survey data? This doesn't capture actual commute times for these populations, and is contrary to most anecdotal information. It is relatively important to be able to analyze access to what kind of jobs - those correlated with the income for those folks. If section 5.4.5 was framed and shown as mobility equity, - "who has what access to where" today, then we could consider how alternatives differ. | Access to (i.e., proximity) transit is good, but actual access to jobs and fast commutes is better. If displacement is exacerbated by a TOD alternative, disproportionately longer commutes will be a given. | Because this is not indicated as a problem, there is no mitigation offered. There is mitigation for displacement and housing generally, but nothing about improving transit reliability and speed. | Collect and disaggregate data by race, income, and geographic location for commute times. Gap analysis for fast transit trips, multi-modal travel options, identify job matching. Can PSRC help coordinate disseminating information on regional scale transportation projects and how they affect commutes across the region? For example, the Seattle Squeeze and viaduct removal impact people outside of Seattle - how can PSRC better hold all current regional transportation information so that residents know which routes are safe and easy to access? | Collect data and have

targets around reducing commutes by transit - identifying and fixing transit bottlenecks, adding more active transportation options that stand alone or lead to transit access, etc. |

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| Transportation - safety | No safety analysis included, so no racial justice analysis of transportation safety | Transportation safety was not included as asked for. It only "promotes safety" by encouraging walking and biking, but these can be unsafe if infrastructure lacks. Transportation safety data should be published and disaggregated by race. Not only are communities of color overrepresented in traffic fatalities and serious injuries, but inequitable policing and enforcement pose both a barrier and safety risk and should be included in equity analysis for safety in transportation. | We want people to have access to safe walking and biking networks. We want to prioritize investments in areas that have disinvestment. We want to ensure enforcement does not prevent or hinder people from using active modes to get where they need to go. | No mitigation offered. | Vision zero should be adopted by VISION. Vision zero should be adopted by ALL jurisdictions eligible for transportation funds. Funding structure should prioritize safety projects in communities of color and low-income communities. PSRC should also keep up to date on how transportation safety and injuries and how they change with new modes and technology. | Vision zero should be adopted as a safety goal. Eliminating disparities by race and income in transportation deaths, injuries, and policing should be a performance goal. |

| Health | Show how determinants of health and health outcomes are distributed. Define where the needs for health inducements are greatest. | Include current health disparity portrayal then measure how the 3 alternatives differ in projected health outcomes and projected disparities by 2070 | Include assumptions of variation how land use bears on health outcomes | Mitigation may include: distance people and residential units from pollution sources, separate bikelped from vehicles, and design in healthy food access. Provide free and "pop up• clinics. Expand the model of providing free healthcare and dental care offered to low income residents across the region (as is done in Seattle Center once a year). As demographics shifts by who can afford to live in the city center, we (researchers and planners) need to be proactive and meet residents where they live now. | Define environmental determinants of health and fund those who ensure these are provided | Account for health determinants and precursors increasingly available where the needs are greatest. |

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| Air quality | Depict how PM2.5 and NOx are distributed. | Depict and analyze how air quality relates to demographics. Use UW & Front and Centered's health disparities map to identify areas we should target. Understanding impacts of new infrastructure as well as construction of new infrastructure is important. How are construction zones using the best materials, recycling and disposing of materials in the cleanest cost-efficient ways. We may want to understand impact on traffic, walkability, in addition to pollution released into the air for several major projects across the region. | Article with study reference: <https://www.globalcitizen.org/en/content/air-pollution-disparities-in-us/>. Another article on a new study shows that impacts of air pollution combined with place (F&C maps) are substantial. | Mitigations may include: vehicle (esp. fleet) electrification, residential setbacks from roadways, position of bus layover and transfer, prohibition of road expansions in these areas, targeted tree retention and planting policies. The state emissions check program needs to be removed from potential mitigation measures as that ends in 2020. | Measures of reducing disparities in exposure over time. | |

| Water | Analysis claims there are no different impacts between alternatives at the regional level for people of color and people with low incomes. | Does not specify whether water impacts (and current access to clean water) are different between low-income and POC groups and white higher-income populations. Does not look at baseline disproportionate impacts of water quality, stormwater impacts, local flooding, etc. Even impacts do not differ across scenarios, we are not told what impacts actually are, and therefore do not have sufficient information to request adequate mitigation. Another point of analysis is to understand clean water access in schools. Some local schools need cleaner water, particularly in the Southeast of Seattle's school district, and likely in other areas of the region. | We want to emphasize growth patterns that reduce greenfield development, encourage growth patterns that do not induce road development, especially in areas that already have poor water quality. | Given that we do not understand the impacts, it is challenging to imagine the necessary mitigation. But stronger stormwater management from development and agencies, and stronger incentives for transportation projects that remove or do not create additional impervious surfaces, especially in areas of concern would be a good start. | What are the actions recommended by the Puget Sound Partnership? Can we require jurisdictions to have stronger stormwater management and prevention requirements in areas with poor water quality? | What is the water quality level we need to hit to restore Puget Sound? |

| DEIS questions > Policy area V | Does this element sufficiently tackle race and social equity? | Is the DEIS analysis of circumstances and impacts correct? What's missing? | What benefits do we want to emphasize? What disproportionate burdens do we want to avoid? | Mitigation - What is good or insufficient? What's missing? | Accountability - How can we focus on action and implementation? | Accountability - How can we use targets, performance measures, and consequences? |

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| Land use | | Food desert - defined in 2008 United States Farm Bill as "an area...with limited access to affordable and nutritious food, in predominantly lower income neighborhoods and communities. | | Can transit centers counter disparities in access to healthy food (farm stands) and open space? | | |

| Land use - schools | | What is the impact of school siting outside of UGA? What are consequences for air quality, traffic, safety? stormwater, and greenfield development? Air quality impacts student learning - understanding the analysis of schools and corresponding air quality is also critical. | | | Need to carry forward language on school siting and focusing on requiring schools to be within a UGA

and promoting alternative modes of transportation. This overlaps with air quality -- we see an increase of traffic around 30% when there aren't safe land use practices for schools. | |

| Open space | We should understand how equitable open space and trail access is today. | Consider disparities in open space and trail access across race and income. | Open spaces have a notable bearing on physical and mental health outcomes, social determinants of health. Safe access to trails encourages activity and improves health outcomes, transit access, and social connection. | Coordinate open space protections and trail construction with anti-displacement strategies. | Use equitable access to open space as a basis for regional and local prioritization in new acquisitions. Use health indicators and equitable access to trails as basis for regional and local prioritization for trail construction and improvement. | Mention, support, and track implementation of Regional Open Space Conservation Plan, investments in areas of high-need. Track Regional Bicycle Network investments in areas of high-need. |

| DEIS questions > Policy area V | Does this element sufficiently tackle race and social equity? | Is the DEIS analysis of circumstances and impacts correct? What's missing? | What benefits do we want to emphasize? What disproportionate burdens do we want to avoid? | Mitigation - What is good or insufficient? What's missing? | Accountability - How can we focus on action and implementation? | Accountability - How can we use targets, performance measures, and consequences? |

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| Displacement | The displacement analysis includes race as a factor for displacement, but does not offer any solutions or mitigations. Displacement is assumed across all three alternatives without any thought to what a displacement risk reduction alternative could look like. | Displacement risk is assessed across the three alternatives, but the analysis of the actual impact of displacement for the displaced residents, businesses, and cultural institutions is not studied. Where will residents live (likely further away from employment centers and high capacity transit)? Where will commercial and community spaces locate when there is no affordable commercial space? What is the impact of displacement on our carbon emissions and transit ridership? Communities of color and low-income residents will not see the fruits of regional growth if we do not center anti-displacement in our growth strategies. We need both transit focused growth and a very strong anti-displacement mitigation and prevention so that we achieve environmental and equity outcomes. Further, currently available data does not adequately measure displacement risk. The analysis cannot measure cultural displacement vs. economic displacement. | | Our region needs a full suite of anti-displacement strategies including: Requiring strong community engagement practices at local and regional level; supporting community driven development through regional funding mechanisms; require local jurisdictions to meet affordability targets through a variety of policies and practices such as inclusionary zoning, supporting affordable housing development, etc; support tenant protections and rent regulation policies at the state legislature; and regionally approved anti-displacement sub-area planning in neighborhoods with high risk of displacement. | Set affordability and anti-displacement targets; develop a regionally administered fund to support community-driven anti-displacement fund; require anti-displacement focused subarea plan prior to zoning changes, station area and corridor planning, transit fund allocation, etc. | Actionable displacement mitigation and prevention plans, both regionally and for each jurisdiction. |

| Public Services - Water | | The update needs to include implementation steps for the Hirst decision and subsequent "fix" legislation that passed in 2018. All counties must match rural development with water availability and can no longer rely on the Department of Ecology's outdated rules | | | | |

Commenter(s):

Seattle Public Schools, Puget Sound Sage, The Wilderness Society, Climate Solutions, Sierra Club
Washington, Transportation Choices Coalition, Futurewise, Cascade Bicycle Club, Housing Development Consortium

League of Women Voters of Washington

Communication ID: 354355

04/25/2019

April 20, 2019

Erika Harris

Puget Sound Regional Council

1011 Western Avenue

Suite 500

Seattle, WA 98104

ATTN: VISION 2050 SEIS Comment

Dear Ms Harris:

We appreciate the opportunity to comment on the Draft Supplemental Environmental Impact Statement for VISION 2050, our region's long-range plan for growth. 2050 is over 30 years away and it is difficult but necessary to anticipate the changes that are likely to occur over that time period, to plan for them, and try to shape the future we want to have. However if we are to be successful in that effort, it is important that we make decisions now that will direct our path toward that future. If that does not happen, we should acknowledge that this vision is unlikely to be achieved.

Let us be more explicit. PSRC has developed a Regional Transportation Plan, just updated last fall, and which the Vision 2050 relies on and refers to in the transportation chapter. That plan identifies the gaps in funding that must be filled if the investments identified in the plan are to be met. Just for transit and ferries this gap amounts to approximately \$10 billion to 2040. The plan also describes potential sources of additional revenue which include fare increases, sales tax increases, user fees, and employee taxes. Our Legislature is just now completing a transportation budget, including a capital budget. It does include some of these options, but gets nowhere near to what the PSRC plan says is required to meet the "near term" revenue to 2025. For example, the Washington State Ferries has determined that 13 new ferries will need to be built over the next 20 years. The proposed state budget may fund one, while adding a 25 cent surcharge to fares to help pay for this capital need. Where will the funding come for the rest? There is no significant additional funding for transit operation and maintenance coming from

the state. It is unlikely that the gap can be met from local funding. If the gap is not addressed, this will result in overcrowded buses, ferries that break down, and less frequent service. This may be a vision, but not one we want.

Let's discuss the impact of the revenue sources that are passed. Many of these such as fare increases, sales taxes, and user fees can be regressive and impact lower income residents negatively. They also can impact demand and actually reduce the transit use we seek to encourage. It will be very important to do a careful cost benefit analysis of any such revenue changes to see what their impact will be before relying on them.

In discussing this with PSRC staff, we were assured that funding at least for Sound Transit projects is in place, and that is reflected in the PSRC Transportation Plan. But is it reasonable to rely on these projects, even assuming they are totally funded, to accommodate the majority of transit trips and associated population growth for the region? If indeed we want 75% of that population to be within a half mile of mass transit, what kind of development needs to occur along those lines to make that happen? Are we anticipating more high rises? More apartments, condos or town homes? Is that what people want and what will they have to pay for them? Even if people want to be close to transit, can they afford to live there? Will there be sufficient development to make this housing affordable? And if not, is the tradeoff paying user fees and even higher transportation costs? How will the Vision address these potentially negative consequences?

The Vision should clearly lay out the contingencies of what can happen depending on the decisions the region has to make today, and the associated environmental impacts of those decisions.

Finally, although the focus of this letter has been on transportation funding related to the Vision, when we look to 2050 we must address the impact of climate change and how that will affect our region. It is anticipated that we will experience warmer but wetter winters and hotter and dryer summers. This will likely mean more flooding and landslides in the winter but lower stream flows and potential droughts and wildfire risk in summer, both of which will place additional demands on state and local governments. The Legislature is currently considering a bill that would add \$62.5 million a year just to address the increased risk of wildfires. Additional resources are also devoted to protecting salmon streams. These competing demands will further limit the ability of local governments to adequately address other needs.

In summary, we applaud PSRC for assuming this challenge of looking ahead 30 years and planning for that future. We encourage you to do that with eyes open to the potential realities we face and acknowledge them clearly.

Sincerely,

Ann Murphy, President

League of Women Voters of Washington

Martha Burke, LWVWA Representative

PSRC Transportation Policy Board

cc: Josh Brown, Executive Director

Commenter(s):

League of Women Voters of Washington, Martha Burke, Ann Murphy

Puget Sound Sage

Communication ID: 354820

04/29/2019

April 29, 2019

Growth Management Policy Board

Puget Sound Regional Council

1011 Western Avenue, Suite 500 Seattle, WA 98104

RE: Vision 2050 DEIS

Dear GMP Board and PSRC Staff,

We appreciate this opportunity to review and submit comments on the Draft Supplemental Environmental Impact for Vision 2050, and want to recognize all of the hard work by staff that has gone into its research and writing.

Puget Sound Sage is strong supporter of PSRC's role, and regional governance in general, as a means to grow sustainably and address regional equity. As such, we see the role of PSRC as setting out a bold vision for a healthy environment, equitable economy, and regional cooperation.

Unfortunately, the DEIS and three growth alternatives in Vision 2050 do not achieve this. At a time when climate change poses dire harm to our communities and racial disparities undermine our democracy, we expect Vision 2050 to reflect a more transformative strategy to correct course on the patterns of historic growth that have led us here. We see Vision 2050 as an opportunity to center our greatest challenges and take them head on. Instead, it offers three alternatives that assume we can't do much about either climate change or the social equity impacts of growth.

We are deeply concerned by several factors:

- (1) None of the growth alternatives offer a plan in which we eliminate carbon emissions associated with transportation, infrastructure, and growth by 2050 while simultaneously mitigating displacement.
- (2) Growth impacts are inadequately modeled due to a lack of displacement analysis and related mitigations, and due assumptions that increased transit, density, and jobs will automatically benefit communities of color and low-income communities.
- (3) PSRC's environmental justice analysis does not adequately define equity geographies nor address historic and future burdens of harm for communities of color and low-income communities from the environmental, cultural, housing, and transportation impacts of growth.

(4) For both climate justice and regional equity outcomes, we favor Transit Focused Growth (Alternative 2) to the others. However, Alternative 2 is simply the least worst of the three and not an adequate vision to advance a region where all people can thrive and be healthy.

(5) Mitigations for disproportion harm from growth and climate change are inadequate to do anything except push the problems further into the future.

Below, we describe in more detail our areas of concern.

****I. Climate Change ****

The stakes of climate change for our region could not be higher. The Intergovernmental Panel on Climate Change's Special Report: Global Warming of 1.5 Degrees, released last year, states that we need to reduce CO2 emissions by about 45% from 2010 levels by 2030, and reach net zero around 2050, in order to keep global warming to below 1.5 degrees Celsius – above which will spell disaster for the planet. The link between our region's growth and climate change are obvious – over the past seven decades, we have grown dependent on individual vehicular travel and inefficient, sprawling use of land that is doing damage to the environment.

Simply put, we need to be planning for a future in which we have eliminated carbon emissions associated with transportation, infrastructure, and growth by 2050. In other words, not just a plan to reduce the impacts from future population and housing growth, but reversal of the impacts of historic patterns of growth. Unfortunately, Vision 2050 avoids setting any bar for climate change mitigation and merely guides us into the least-worst growth scenario.

As such, the DEIS presents inadequate study, analysis, and planning for climate change and its impacts on the Puget Sound Region. It particularly fails to seriously assess impacts to low-income communities, communities of color, refugees, immigrants, and indigenous communities. Lack of bold planning for climate and climate justice in Vision 2050 will result in (1) a failure to reduce carbon reduction goals that we need to ensure a habitable planet for future generations and (2) low-income communities, communities of color, refugees, immigrants, and indigenous communities bearing the worst of the climate impacts because climate change is a threat multiplier that exacerbate existing disparities.

Climate change is already impacting the Puget Sound Region, and will only worsen if we do nothing. For example, Vision 2050 mentions that flooding and sea level rise will impact shoreline and watershed communities but does not offer an alternative nor mitigation to address environmental justice impacts. The Duwamish River Valley is expecting 1 ½ ft of sea level rise and 4 ½ ft storm surges and high tides by 2050, and 4 ½ ft sea level rise and 8 ft storm surges and high tides by 2080 (as reported by the City of Seattle). Currently, the Duwamish Valley is also home to indigenous communities, low income communities, communities of color, and immigrants; is the site of superfund clean-up sites, generations of toxic waste, ongoing industrial pollution and toxics production; and has higher rates of asthma and decreased life expectancy compared to other communities in King County. The DEIS acknowledges that environmental justice communities experience disproportionate impacts, but then fails to incorporate climate impacts such as flooding, wildfire smoke, heavier rainfall, decreased snowpack, strained water and energy infrastructure, and increased growth pressures from future climate refugees.

Sage strongly urges PSRC to adopt carbon reduction goals that minimize global warming to 1.5 degrees Celsius or lower, study the intersection of climate change and future growth in the Puget Sound Region, and present an alternative plan in which:

Carbon emissions are eliminated by 2050

Climate impacts are addressed by growth, transportation, and infrastructure planning and

The social cohesion, civic engagement, and political power of communities of color, low-income communities, refugees, immigrants, and indigenous communities is strengthened, while racial, economic, gender, and social inequities are addressed and mitigated.

****II. Equitable Growth ****

Equitable growth can only occur if the benefits of that growth are shared. The DEIS assumes that increased transit and increased density will automatically lead to better outcomes for low-income households and people of color. While PSRC has acknowledged that potential displacement impacts are difficult to model, we argue that the effect of displacement will be large enough to undermine the overall modeling that forms the basis for comparison between alternatives.

A problematic assumption in the growth projections is that households that are currently transit reliant will have the same access to transit in the future. However, a combination of public investments and density policy are currently displacing people of color and low-income communities farther away from transit, work, and their cultural and community centers, resulting in less access to transit, increased vehicle miles traveled, and increased carbon emissions. This has both an impact on the overall jobs housing balance analysis and any equity assessment. For example, under Alternative 2, PSRC estimates that 23% of the growth will take place in areas at risk of displacement – making displacement an unavoidable consequence. We urge PSRC to identify some sort of modeling of displacement to improve accuracy – or at least the range – of impact to our jobs-housing balance. Such displacement projections could show that without mitigation, such investments could do net harm to communities of color and low-income communities.

Other problems include:

As the DEIS notes, if we direct regional growth to HCT Communities and restrict growth in other areas, demand for land, housing and commercial space will increase in HCTCs. As a result, lower income households, which are disproportionately people of color, will be pushed to lower density cities with lower transit capacity. However, not all cities currently accommodate low income households and people of color. Suburban cities with exclusive zoning, such as restricting apartment buildings and mostly single-family zoning, will create significant barriers for people displaced from HCTCs. This will result in only a few low-density cities bearing the impact.

2. While the DEIS finds that on average, people will drive shorter distances, spend less time commuting, and have access to more jobs, an equity analysis requires more than an assessment for a hypothetical average, but specific outcomes for low-income households and people of color. As we are observing gentrification and displacement along the light rail in the Rainier Valley, it seems short-sighted to assume that everyone will benefit from transportation infrastructure equally and gauge mitigations based on those assumptions.

3. The DEIS also assumes that merely creating jobs in an HCTC will economically benefit people of color and low-income households. Growth patterns are only one factor in access to living wage jobs. Policy is needed in HCTCs that support access to jobs by people marginalized in the labor market, including; priority hiring of women, people of color and people with disabilities; job training and apprenticeships; workplace democracy; and community-benefits agreements that improve job quality.

****III. Environmental Justice Analysis ****

We appreciate PSRC's efforts over the last several years to do equity analyses, define "equity geographies," and to map displacement risks. We strongly believe that addressing impacts to environmental justice communities will improve conditions for everyone. However, the DEIS does not adequately study which communities experience the most disparity in outcomes from regional growth. Rather than use a simple grouping of areas with a higher share of low-income households or higher share of people of color, we urge PSRC to look at a combination of race, income, and existing environmental exposure and proximity to toxics and pollution.

Puget Sound Sage recommends that PSRC (1) employ the Washington Environmental Health Disparities Map (<https://fortress.wa.gov/doh/wtn/WTNIBL/>) to identify communities facing greater burdens of environmental health risks in their analysis, (2) combine this analysis with a displacement risk map to identify all communities being forcibly at risk of being forced away from their communities, and (3) factor in forecasted climate impacts to the region. Combining all of these factors, PSRC should then adjust growth, develop policy, and prioritize resources to ensure that these most vulnerable communities are not bearing the burden of environmental harms, climate impacts, or displacement pressures, but that planning, policies, and resources are instead being deployed to mitigate environmental harm, climate impacts, and displacement pressures.

In part because of how PSRC defines equity geographies, we also disagree with PSRC's findings that (1) proposed mitigation strategies are sufficient to mitigate environmental injustice and displacement and that (2) there is no difference in outcomes for communities of color, low-income communities, refugees, immigrants, and indigenous communities between growth alternatives proposed. PSRC's premise that "none of the alternatives are anticipated to result in disproportionately high and adverse effects on people of color and people with low incomes" ignores the ongoing reality that communities of color, low-income households, refugees, immigrants, and indigenous communities are already living with disproportionate harm and adverse effects from historic and ongoing systemic barriers to prosperity. If the region does not actively address these harms in their growth plans and proposed policies, they will continue to disproportionately harm communities of color, low-income communities, refugees, immigrants, and indigenous communities.

We also believe that the proposed mitigation measures are insufficient, and must go beyond outreach and supporting the development of affordable housing infrastructure to include: (1) the reduction and mitigation of pollution associated with transportation and infrastructure development and (2) the investment of money, resources, and infrastructure into communities -- in a manner that is guided and led by communities -- disproportionately impacted by transportation-related pollution, climate-impacts, toxics exposure, gentrification and displacement.

****IV: Transit Focused Growth ****

As currently studied, all three of the alternatives will result in different burdens of harm borne by impacted communities. However, Alternative 2 offers the best of the three by encouraging a transportation system that reduces reliance on single occupancy vehicles; reduces vehicle miles traveled; invests in mobility options provided by our public transportation system; invests in walking and biking infrastructure; and eliminates our use of fossil fuels in the transportation sector. By 2050, we cannot be emitting carbon into the atmosphere and we need to start planning for a future in which we do not rely on fossil fuels to get around. By this measure, Alternatives 1 and 3 fail more than Alternative 2. That said, we want to emphasize that the underlying strategies and analysis for Alternative are not adequate to fully understand the true impacts of projected growth patterns.

****V. Additional Mitigations ****

In order to strengthen any alternative PSRC chooses, we recommend the following mitigations be included in the final EIS and in Vision 2050 itself.

Set housing affordability targets for all jurisdictions, especially ones designated as low density and high opportunity areas.

2. Study, encourage, and fund policies and programs that prevent displacement from HCT Communities, such as community-driven development, inclusionary housing, equitable zoning overlays, tenant protections, and commercial stabilization for small, culturally serving businesses.

3. Study, encourage, and fund policies and programs that ensure low-income households and people of color can access high-quality jobs to ensure that a better jobs-housing balance actually creates equity benefits. These include including priority hiring of women and people of color; job training and apprenticeships; workplace democracy; community-benefits agreements; and accessibility.

4. Study, encourage, and fund policies and programs that ensure low-income households and people of color are resilient to climate change impacts, such as flooding, smoky air, and weather events.

5. Begin to track patterns of displacement of low-income households and people of color out of HCT Communities to include in all of PSRC's planning processes.

6. Analyze of all PSRC cities' and counties' zoning codes to identify exclusionary practices that prevent moderate density and affordable housing from being built. Then craft a set of zoning standards that jurisdictions must adopt until they reach affordable housing targets.

7. Increase enforceability of PSRC growth policies and mitigations, such as housing targets, Center City designations, and the Growing Transit Communities Compact, with increased consequences.

8. Provide smaller jurisdiction additional planning funds to address environmental/climate impacts from growth and to plan for increased density and affordability.

Thank you for your time and attention.

Sincerely,

Giulia Pasciuto, Equitable Development Policy Analyst

Katrina Peterson, Climate Justice Program Manager

Commenter(s):

Puget Sound Sage, Guilia Pasciuto, Katrina Peterson

Puget Sound School Coalition - King County Component

Communication ID: 354805

04/29/2019

April 29, 2019

Via Email: VISION2050SEIS@psrc.org

Vision 2050 SEIS Comment

Puget Sound Regional Council

1011 Western Avenue, Suite 500

Seattle, WA 98104

Re: Comments- Vision 2050 Draft Supplemental Environmental Impact Statement

Dear Puget Sound Regional Council:

The King County Component of the Puget Sound School Coalition 1 (the "School Coalition") submits these comments on the Vision 2050 draft Supplemental Environmental Impact Statement ("DSEIS"). The comments below follow the School Coalition's March 19, 2018 comments submitted during the scoping period (the "School Coalition Scoping Comments").

The School Coalition is particularly concerned with how Vision 2050 will direct mitigation for schools and school facilities needed to address the impacts of 1.8 million new residents to this region by 2050. Although the three alternatives analyzed in the DSEIS will impact individual school districts differently, the DSEIS correctly notes that each alternative will require new, expanded, or remodeled school facilities to serve projected growth. New development can uniquely affect school districts by increasing student enrollment and reducing land available for the schools needed to serve those students. Local planning can exacerbate these impacts by limiting the location and practical permitting of new schools. Among other things, the preferred alternative must include mitigation strategies to ensure adequate land and efficient permitting tools for siting schools.

The School Coalition acknowledges two of the DSEIS' s proposed mitigation measures applicable to schools, identifying opportunities for shared facilities and proactive planning collaboration between jurisdiction and school districts, as effective and practical solutions if properly followed and implemented. As noted in the School Coalition Scoping Comments, it is critical that cities and counties have incentive to work collaboratively with school districts to address siting and capacity issues in a practical manner. In some instances, private development

1 The King County Component of the Coalition includes the Issaquah, Lake Washington, Northshore, Riverview, Snoqualmie Valley, and Tahoma School Districts.

is prioritized over public school facility needs or school projects are held to more onerous and costly standards. To facilitate meaningful proactive collaboration, the SEIS and Vision 2050 should recognize more specific mitigation measures, such as:

Prioritizing school district purchase of surplus governmental property;

Preserving adequate land in anticipated growth areas at a reasonable cost for school infrastructure;

Regularly reviewing and updating local regulatory approaches, including code requirements and permitted uses in zones, with the intent to facilitate and prioritize the siting of schools;

Pursuing opportunities for shared use of public property;

Increasing local investment in off-site public infrastructure to support the location of a school needed to serve permitted growth; and

Ensuring that new residential development pays its fair share of the cost of the of school capacity needed to support the permitted growth project.

These more specific mitigation measures would recognize the GMA's expressed shared planning responsibilities and further facilitate delivery of schools needed to support the preferred growth alternative.

As noted in the School Scoping Comments, the reassessment of school boundaries is neither an appropriate nor effective mitigation measure. School district boundaries may only be altered by a transfer of territory, the consolidation of one or more school districts, or the dissolution or annexation of all or part of a district.² Even in those limited circumstances, the reassessment of school boundaries is subject to a complex and extensive process that requires consideration of a multitude of factors.³ Those concerns aside, this mitigation measure would not be effective in addressing growth because students would merely be shifted from one overcrowded school district to another, without addressing the underlying issue. That is avoidance, not mitigation. Individual school districts already regularly reassess internal school service area to balance growth within the system as it occurs. If this is the intent of the mitigation measure included in the DSEIS, it should be so clarified.

Under all three alternatives, new growth will occur under conditions where new school sites are currently difficult and in some cases impossible or prohibitively expensive to locate. As such, Vision 2050 should include a requirement for planning jurisdictions to provide in a substantive and meaningful manner for schools facility needs when updating countywide planning policies and comprehensive plans.

We appreciate the opportunity to submit these comments and look forward to continued participation in the Vision 2050 process.

² RCW 28A.315.045.

³ RCW 28A.315.205.

Sincerely,

PACIFICA LAW GROUP LLP

Denise L. Stiffarm

cc: Members, Puget Sound School Coalition - King County Component

[Commenter\(s\):](#)

Puget Sound School Coalition - King County Component, Pacifica Law Group, Denise Stiffarm

[Sierra Club Washington](#)

[Communication ID: 354851](#)

[04/29/2019](#)

29 April 2019

To: Erika Harris, PSRC SEPA Responsible Official

Subject: Draft VISION 2050 SEIS

Thank you for the opportunity to contribute to the VISION 2050 process. The Sierra Club considers such planning key to ensuring a sustainable future for our region.

In March 2018 the Sierra Club, along with Transportation Choices, Puget Sound Sage, Futurewise, Forterra, OneAmerica, and Cascade Bicycle Club submitted a set of comments on VISION 2050 Scoping. We collectively asked for:

- Emphasis on policies on health, equity, and the environment.
- Focus on action items and implementation of the VISION.
- Use of specific targets and performance metrics to measure success.

The draft SEIS embraces many of these approaches in a fair and equitable manner.

The “Transit Focused Growth” alternative provides many desired outcomes as it:

- Focuses growth in the Metropolitan Cities, Core Cities, and high-capacity transit (HCT) communities.
- Provides for compact growth near the region’s existing and planned transit investments.
- Assumes a greater role for areas served by high-capacity transit outside of Metropolitan and Core Cities.
- Results in lowest growth in rural areas and unincorporated areas without access to high-capacity transit.

However, we have an overriding concern about the scope of the alternatives.

Although the PSRC has evaluated quite well the pros and cons of the alternatives selected, all three fall short of what the region needs to attain by 2050 to minimize the impacts of adding 1.8 million people (and 1.2 million new jobs) to our region’s ecosystems. We face a considerable challenge dealing with such growth including increased development, reduction in land cover, more transportation

infrastructure, and decreased habitats. Consequently, we see VISION 2050 as but a step in what should be a continuous planning exercise, as conditions often change and in directions not always foreseen.

We understand the bases for the population/job projections provided. However, we believe such long-term projections (out to 2050) need to address some of the more atypical scenarios that possibly will become typical—all related to the far-reaching impacts of human-accelerated Climate Change and degradation of vital ecosystems.

As we enter a period of greater uncertainty, our region needs to look at additional growth scenarios where there is a divergence among population, jobs, and economic growth. Such a divergence could happen with an influx of climate refugees, a gradual erosion of conventional economic growth (and urbanization), or a changing mix of job types and standards of living. Consequently, we need to recognize such scenarios and plan for unexpected setbacks by building in resilience.

The magnitude of challenges the region faces with the backdrop of climate change leads us to characterize the Transit Focused Growth alternative as inadequate, while still clearly preferring it to the other studied alternatives. The need for adaptive learning, feedback improvements, and resilience in the face of uncertainty are key principles that need to inform the VISION 2050 planning process into the future.

We offer detailed comments on many sections of the VISION 2050 Supplemental EIS in the subsequent pages of this correspondence. Thank you for your consideration.

Sincerely,

Tim Gould Chair,

Transportation and Land Use Committee

Sierra Club Washington Chapter

[email address]

Executive Summary

Alternatives evaluated in this SEIS

The new PSRC “Regional Geographies” system used to classify an area by what role it plays in the greater region is an important concept. We lend our support as it:

Defines different geographies by their contribution to the region;

Recognizes the importance of High-Capacity Transit Communities; and

Continues to identify the differences among Cities & Towns, Urban Unincorporated Areas, Rural Areas, Resource Lands, and Governmental Properties such as Military Installations.

Such a system should filter down to the County and City planning exercises.

Three alternatives are identified:

“Stay the Course” — If we were to continue along the same lines as we are now, it would not allow us to meet State and King County Climate goals.

“Transit Focused Growth” — This appears to be the best option for planning our future to ensure long-term sustainability.

“Reset Urban Growth” — Such a scenario would be highly detrimental to the region’s ability to meet climate goals and worsen its environmental footprint, possibly permanently.

Comparison of Alternatives The comparison tables and figures are very useful in helping to evaluate the pluses and minuses of each alternative.

Table ES-1. Summary Comparison of Alternatives to Stay the Course provides a direct comparison in terms of growth patterns among the newly defined “Regional Geographies”.

The “Transit Focused Growth” alternative shows higher population in the High-Capacity Transit Communities.

However, it also shows that High-Capacity Transit Communities essentially act no differently in terms of employment growth, as all three alternatives show ~12 - 13% shares—we question this finding.

Table ES-2. Impacts Common to All Alternatives shows many negative impacts associated with all three alternatives, which must be minimized or eliminated, such as:

Land-Use: “... lower-density land uses and potential development pressures on natural resource lands”

Transportation: “... congestion each year is forecast to increase”

Habitat Degradation: “... adverse impacts to ecosystem resources such as fragmentation and degradation of habitat”

Water Quality: “... alter stormwater hydrology, reduce aquatic habitat, and degrade water quality”

Open Space: “... degradation of the recreational experience, potential degradation of natural and open space resources, and increased conflicts between users”

Table ES-3. Summary Comparison of Alternative Impacts clearly shows there would be very different environmental impacts among the three alternatives.

We find the “Transit Focused Growth” alternative provides least impacts across the board for each category (“Topic”) of the three alternatives.

Introduction

Given the rapid growth in the region over the past few decades and the expected growth in the coming decades, an update to the VISION 2040 (adopted in 2008) is appropriate and necessary to ensure such growth can be accommodated sustainably for both our shared environment and our quality of life. Key to this effort will be robust measures to track progress in meeting identified goals for the region.

The Growth Management Policy Board (GMPB) identified a set of good objectives (pp. 4-5) for the Regional Growth Strategy that we fully support. All of the outcomes the GMPB identified (p. 5) are important and should be met, but we especially are concerned our region takes meaningful steps to:

Reduce greenhouse gas (GHG) emissions.

Restore, protect, and sustain our natural environment.

Ensure a safe, clean, integrated, affordable, and highly efficient multimodal transportation system.

2. Affected Environment

While we generally agree with the list of “... some of the key regional changes in the last decade?” (p. 10), we would like to see the SEIS recognize some concerns here:

- * “Tech industry employment is experiencing rapid growth, particularly in Seattle and central King County” Comment: This has been a good trend, but is it sustainable and is such geographic concentration good for the region?
- * “Job growth has been strong in recent years but has been uneven across the region and between industries” Comment: This is one of the underlying issues that must be addressed as it directly adversely affects our transportation infrastructure and environment, as well as any hope of reducing our GHG emissions.
- * “Population and housing growth is continuing at a rapid pace” Comment: This is not sustainable without proper regional and local planning and, even then, might be overwhelming if addressed in a piecemeal fashion. Attention is needed for a better housing-jobs balance throughout the region.
- * “Regional demographics are changing as the population is becoming older and more racially and ethnically diverse” Comment: This is both challenging (i.e., “older”) and good (i.e., “diverse”), especially for the economy.
- * “Rent and home prices have been increasing dramatically, causing a crisis of housing affordability” Comment: This will continue to be a growing dilemma that requires real solutions that are lasting, otherwise progress made in other areas, such as the environment, will be eroded.
- * “Transit infrastructure around the region is expanding, and transit ridership is increasing” Comment: This is true, but woefully deficient to address the magnitude of current day problems and those that will multiply and face the region in the coming decades.
- * “Climate change is of growing urgency, and intersects with many resources including air quality, ecosystems, and water” Comment: This is the “elephant in the room” and intersects with every other issue, such that it is how success or failure will be measured.

We find PSRC’s efforts herein to identify and qualify changes since VISION 2040 good. Below we provide comment to flag some key areas of concern we believe our region must confront over the next three decades in order to assure a sustainable future.

2.1 Population

A major concern as the region continues to grow is where that growth goes. In the past too much of that growth has dis-proportionally gone to small, suburban cities that has perpetuated sprawl and created intolerable morning and evening traffic jams on every major arterial in King County. In the future, to be sustainable, such growth must be funneled to the major urban areas and regional growth centers.

2.2 Employment

While charts like Figure 2.2-2 (p. 15) show employment increases over the past decade throughout the region, most of the higher paying jobs are concentrated in Seattle, Bellevue, and other wealth-of-opportunity cities causing intolerable commutes for people who simply cannot afford to live in or close to those cities. Table 2.1-1 (p. 16) supports this assertion. A better balance of high-opportunity jobs relative to regional housing is needed to enable more residents access to these higher paying jobs.

2.3 Housing

The issue of housing and rental costs will remain an important issue throughout the region in the coming decades. Figure 2.3-4 (p. 21) paints a depressing story, as the trends of reductions in the Housing Affordability Index show no signs of abating. While we recognize the importance of maintaining a “Jobs-Housing Balance,” few communities achieve same and the problem appears to be getting worse.

2.4 Land-Use

2.4.2 Regional Growth Centers and Manufacturing/Industrial Centers

The designation of both RGCs and M/ICs helps both short- and long-range planning efforts at all jurisdictional levels. However, we question whether or not such centers are taking sufficient growth as evidenced by the percentages—both the totals and the changes from the year 2000—provided on p. 28. In reviewing Figure 2.4-4 (p.29) it is evident that several RGCs are not along major transit lines and, thus, provide insufficient transportation options for commuters who work in them.

2.4.3 Transit-Oriented Development

This section is a welcome addition. Transit-Oriented Development (TOD) must be a key concept in our regional and local planning to help us meet our GHG-emission goals and make best use of limited transportation monies. Full build out of Sound Transit’s Light Rail lines, along with continued addition of other mass transit options and connecting local services, must remain the region’s focus to make the best use of TOD.

2.5 Transportation

2.5.1 Transportation System Capacity Improvements Transit

We applaud that transit agencies develop or update their own long-range transit plans, resulting in a “robust transit network throughout the region.” A key factor in success of these efforts is to improve integration among transit systems, so the user can experience a seamless system not dependent on the paint scheme of the transit vehicle ridden.

Active Transportation

We fully support the “regional bicycle network and pedestrian networks to designated regional centers and transit station areas as a framework for regional and local nonmotorized transportation planning and investment.” Further incentive or encouragement for local plans and investments to expand bicycle and pedestrian networks will be essential to create human-scale communities where residents can easily reach employment, services, cultural and recreational attractions in a low impact manner.

Implementation of more active transportation facilities will require explicit prioritization at the local level throughout the region.

Roadway Systems

While we support PSRC's 2018 Regional Transportation Plan, we remain wary of adding "capacity improvements" that include simply paving more lane-miles.

Transportation options, and more efficient use of existing roadway capacity via an innovative set of transportation-demand-management strategies, must be the focus of our regional, county, and city planning efforts.

Ferry

Increased ferry service capacity, especially use of more passenger ferries to connect major urban centers with proximate marine terminal access, can play a very important role in moving people throughout the region with reduced climate footprint.

Regional Aviation System

The difficulty in reducing the climate footprint of aviation may require a rethinking of the advisability of increasing capacity of the regional air transportation system.

Other forms of transportation appear better suited to conversion of conveyance vehicles to electric or biofuel propulsion. Planning for future airport capacity needs should include joint civilian-military operations at McChord Field and use of the Grant County International Airport in eastern Washington for intercontinental service along with land-based connections to central Puget Sound.

Intercity Passenger Rail and Bus Service

The role of intercity passenger rail to help reduce the congestion, energy use, and environmental impacts of highways deserves greater attention and resources.

While primarily a State role, PSRC should be an active partner in efforts to bring electrified rail to regional corridors, which could reduce the environmental impact of regional commuter rail service. The Seattle-Portland corridor and its regional components could follow an expansion path similar to that outlined in the Solutionary Rail plan (www.solutionaryrail.org/srvideo).

Freight

Investments in the transportation system to increase freight capacity need to be carefully and strategically located and designed so as not to encourage sprawl development that would run counter to the preferred Transit Focused Growth strategy alternative for VISION 2050. Plans should consider freight only or freight traffic preference highway lanes where these capacity investments are identified.

Greater emphasis on freight rail for longer distance cargo routes as an alternative to long-haul truck traffic should be a plan priority. Electrified rail corridors for both freight and passenger use in a form such as that presented in the Solutionary Rail plan (www.solutionaryrail.org/srvideo) should be part of future freight planning.

2.5.2 Transportation System Efficiency Improvements

Transportation demand management “promoting alternatives to driving alone, shifting trips out of peak travel periods, or eliminating the need for trips” must remain our focus going forward, as it is the only way to make the best use of our transportation infrastructure, save monies in the long run, and protect our shared environment, as well as reduce GHG emissions.

2.6 Air Quality and GHG Emissions

2.6.1 Pollutants of Concern

Improvement in air quality over several decades is an encouraging trend for the region. However, specific locations where high traffic volumes, particularly with diesel-fueled heavy-duty trucks, or concentrated industrial facilities cause higher levels of pollutants that affect low-income residents are likely to remain a challenge for managing air quality. While achieving the ambient air quality standards in the maintenance areas for particulate matter should be a high priority, the emergence of other pollutants such as ultra-fine particles as a source of health impacts could affect the planning for transportation system investments and growth patterns.

2.6.2 Greenhouse Gas Emissions and Climate Change

The Sierra Club continues to work with various governmental agencies in seeking solutions to meet their GHG-emission reduction goals. That said, having such varied goals among agencies simply is not productive. However, our biggest concern is that none of the goals of any of the agencies are strict enough to avoid the worst effects of climate change.

Figure 2.6-2 (p. 42) shows that in 2015 over a third of the region’s GHG emissions are sourced from vehicles (most of those passenger vehicles) on our roads. This share most likely is higher now as many more vehicles are on the roads. It is here we must concentrate much of our efforts by making commuting much more efficient and single-occupant vehicles much less attractive.

2.7 Ecosystems 2.7.3 Relevant Plans, Studies, and Court Rulings

While we applaud the ecosystem preservation and restoration plans that have been developed, the dearth of funding to implement same has made many moot, shelfbound strategies, which, all too quickly, become out of date. Meanwhile, ecosystems continue to be threatened by ever-growing development pressures.

2.7.4 Climate Change

The overarching and severe affects of climate change continue to worsen and our response has continued to fall further and further behind what is needed to ensure the long-term health of our critical ecosystems. Without major policy changes at all levels of government, we will not be able to make any meaningful levels of progress in ecosystem preservation and many restoration efforts will fail.

2.8 Water Quality and Hydrology

2.8.1 Impervious Surfaces

While the total acreage of impervious surfaces throughout the region shown in Table 2.8-1 and mapped in Figure 2.8-2 is informative, we suggest the analysis of impervious surfaces focus on their location relative to groundwater recharge zones and domestic water supply wells. Stormwater management

conditions and potential for upgrades relative to the location of impervious surfaces are important to inform land use plans.

2.8.2 Climate Change and Sea Level Rise

“Water resource managers and planners must plan for new risks and vulnerabilities that may not currently be managed within existing practices” is an example of the need for greater resilience to deal with climate change impacts in plans and practices informed by the VISION 2050 update.

2.8.3 Policies and Regulations

The watershed planning and standards for new domestic water use and fees for building a permit-exempt well under the new streamflow restoration law may not prove to be adequate to maintain in-stream flows during dry periods in the hydrologic cycle in stressed watersheds. Salient issues in the Hirst State Supreme Court decision may present recurring problems over water resource use and management due to inadequacies in the streamflow law and implementation. A drill first, mitigate later approach will not provide sufficient in-stream flows.

2.9 Public Services & Utilities

New capital facilities and maintenance of existing utility systems and public services will be less expensive, more efficient, and result in fewer environmental impacts under a Transit Focused Growth alternative for VISION 2050 compared with the other studied alternatives. The synergy of dense urban growth and lower expense public services and utilities cannot be overemphasized.

2.10 Parks & Recreation

Sierra Club strongly supports an increased emphasis on access to green space, particularly natural areas. We do not feel support for urban green space is at all at odds with policies promoting more urban density. Convenient access to urban green space should be accessible for the benefit and health of residents; studies show greater health benefits in populations that have historically not enjoyed such access, including low-income populations and communities of color. In short, access to green space is an equity issue. We support efforts to add more residential density near parks in predominantly single-family land use areas.

2.10.6 Climate Change

We wish to emphasize that open space preservation and expansion are critical to not only fighting climate change, but helping ecosystems adapt to a changing climate. The role of forests, forest soils, agricultural soils, estuaries, and wetlands in storing carbon must be highly considered in management of resource lands.

2.11 Environmental Health

2.11.1 Contamination and Pollution

Cleanup of contaminated sites is an important step to facilitating more vibrant, compact urban neighborhoods consistent with the Transit Focused Growth alternative. PSRC should explore policy and regulation adjustments that can hasten the cleanup of contaminated sites according to standards that will accommodate a variety of repurposed uses for these sites.

2.12 Energy

Figure 2.12-1 (p. 65) clearly shows that the increasing concern facing the region is the energy consumption of the transportation sector--the only trend line going up through 2016. New data when available for 2017, 2018, and 2019 surely will show that trend increasing even more. This rising energy use, along with the traffic congestion that causes it, is and will continue to be one of the biggest challenges for which the region must make significant progress.

2.16 Noise

While noise sources in the urban environment may have increased with regional growth, the use of new materials and emerging technologies can help to mitigate the impacts of noise in urban areas.

2.17 How Has the Regulatory Setting Changed Since VISION 2040?

Countywide planning policies and local comprehensive plans have been updated to be consistent with VISION 2040, but the effect of these updates is only now beginning to be experienced. Quicker implementation of VISION 2050 policies along with evaluation and feedback mechanisms to ensure the policies are followed and having desired effects will be needed.

3. Alternatives Evaluated

Since the Growth Management Act requires each of the four counties (in consultation with their cities) to adopt Growth Targets out 20 years, there should be continuous monitoring of progress to ascertain how the region is faring in meeting those targets. With the projections of adding 1.8 million more people to the region by 2050, this is even more imperative. Such metrics should be clear to understand and made publicly available.

While some cities will meet their targets, and some fall short, we should not be complacent that these simply “cancel each other out,” because, where growth goes is possibly even more important. This is especially true where there is insufficient infrastructure available to accommodate such growth.

3.1 How the Alternatives Were Developed

3.1.1 Process for Developing Alternatives

The Sierra Club strongly supports the State Growth Management Act’s “...objectives of containing the expansion of urban areas; conserving farmlands, forests, and open spaces; supporting more compact, people-oriented living and working places; and focusing a significant amount of new employment and housing into cities with vibrant urban centers” (p. 78) and its use as the basis to inform VISION 2050’s plan to accommodate the expected large growth in both people and jobs.

3.1.2 How Regional Growth Was Allocated

While we are generally supportive of the modifications to the regional geography classification system, Sierra Club does have some concerns about the implementation of this geography classification system as presented in Table 3.1-2 Description of Regional Geographies.

The inclusion of Arlington under HCT Communities is misplaced, as it would more appropriately be classified in the Cities & Towns category. Instead of the long, narrow extension of HCT Communities land northeast to Arlington illustrated in Figure 3.1-1, a separation of categories between Marysville and

Arlington is more appropriate since the designated urban growth area was initially too large encompassing lands better classified as resource or rural.

The cities of Beaux Arts, Clyde Hill, Hunts Point, Medina, and Yarrow Point would all be better classified as HCT Communities and be required to take more growth and density. Beaux Arts will soon have proximate access to light rail service via the South Bellevue Station, while the other four cities are near to express bus access along the SR 520 corridor, which we hope to see one day upgraded to light rail service for a line connecting Ballard, University District, South Kirkland, and Redmond. Parts of Clyde Hill are within walking distance of major commercial centers in Metropolitan City Bellevue. The classification of these five suburban cities as Cities & Towns appears to be an attempt to prevent more residential density from occurring there, which we find to be an elitist and unacceptable affront to efforts to create more equitable housing options in geographies with favorable location and infrastructure that can support more such growth.

3.2 Stay the Course (No Action Alternative)

Although the “no action alternative” extends the regional growth strategy of VISION 2040, which focused growth in a “compact growth pattern,” it has resulted in ever worsening traffic congestion and housing affordability. The region cannot afford to “stay the course.”

3.3 Transit Focused Growth Alternative

The strongest rationale for the region’s future growth strategy is offered here with the: “...explicit goal for 75 percent of the region’s population and employment growth to occur within regional growth centers and within a quarter-mile to a halfmile from current and planned investments in high-capacity transit, including light rail, bus rapid transit, commuter rail, ferries, and streetcar. This would result in the largest shares of growth to Metropolitan Cities, Core Cities, and HCT Communities” (p. 88). This possibly is the only solution to sustainably accommodate the anticipated growth in the region.

3.4 Reset Urban Growth Alternative

This “reset urban growth” alternative, as with the “stay the course” alternative, would fail our region and must not be either of the paths we take.

3.5 Alternatives Comparison

The information presented is very useful in understanding how the alternatives compare and could affect the region in the years to come. Such information further reinforces our belief that the “transit focused growth” alternative is the best of those evaluated by PSRC for our region moving forward.

Unfortunately, we have major concerns that--while such regional planning is necessary-- there is still too much parochial behavior by the counties and their cities, i.e., there is a dearth of effective intergovernmental cooperation, although required by the State Growth Management Act. Without such cooperation and with few effective enforcement mechanisms in place (e.g., transportation concurrency is not enforced, especially between jurisdictions), it will be hard to ensure counties and cities conform to and successfully implement and execute key aspects of the regional plan.

4. Environmental Effects and Mitigation

4.1 Population, Employment, and Housing

4.1.1 Analysis of Alternatives

4.1.1.1 Impacts Common to all Alternatives

At present, moderate-density housing tends to provide more affordable housing choices than either low- or high-density housing options. Mitigation policies put in place now and in the near future can ensure that adequate affordable housing choices exist in high-density housing land uses. Displacement or its potential should not be used as rationale for discouraging increased housing density. Complementary policies that reverse displacement and provide mitigation where it does occur will be needed to ensure the needs of households at all income levels can be met.

4.1.1.2 Comparison of Alternatives

Both Figures 4.1-1 and 4.1-2 [p. 100] show the clear advantages of the “Transit Focused Growth” alternative, which leads to both a good Job-Housing Index close to the regional average of 1.0 and more high-density, compact housing growth combined with the least low-density housing growth.

4.1.1.3 Impacts of Stay the Course (No Action Alternative)

Impacts presented indicate the “Stay the Course” alternative will further ingrain sprawl into regional planning, which would be the costliest and least sustainable path to take, which further reinforces the need to no longer stay the course.

4.1.1.4 Impacts of the Transit Focused Growth Alternative

A key advantage cited here is that high-density, compact housing growth improves across the board for all four counties and low-density housing growth is reduced— all as compared to the “Stay the Course” alternative.

4.1.1.5 Impacts of the Reset Urban Growth Alternative

We see many of the same negative characteristics here as with the “Stay the Course” alternative. Several indicators of environmental effects and sustainability are even worse than with “Stay to Course”.

4.1.2 Cumulative Effects

It is important to look at cumulative effects here, as all too often projects are approved in cities without much thought given to the overall cumulative impacts, even though SEPA requires same.

On stemming the growth of climate change we fervently agree the region must tend towards more “compactness and density of new development,” as the transportation sector is one of the largest contributors to GHG emissions.

4.1.3 Potential Mitigation Measures

Housing and employment mitigation measures will no doubt be needed to ensure access to opportunity for all groups and to overcome imbalances in market power and rising inequality. We are especially favorable regarding these measures:

- Prioritize regional funding for transportation projects that support affordable housing;
- Rezone for increased density near transit and services;

- Expand housing diversity, particularly moderate-density housing;
- Invest in infrastructure that connects designated centers;
- Use incentives and investments to create a closer balance between jobs and housing.

4.1.4 Social Equity Considerations

Low income housing incentives in close proximity to transit, active transportation networks, jobs, and environmental amenities will help maintain stable communities.

4.1.5 Significant Unavoidable Impacts No comment.

4.2 Land Use

4.2.1 Analysis of Alternatives

4.2.1.1 Impacts Common to all Alternatives

Of all the items listed in Section 4, Land Use is the most sensitive to jurisdictional laws, zoning rules, and enforcement of both. While adequate planning is necessary, it is not sufficient without adequate follow-up and continuity of local government administrations over time.

4.2.1.2 Comparison of Alternatives

We support the land-use assessment that the Transit Focused Development alternative would have the least impacts in terms of the three categories listed: “acres of developed land,” “proximity to transit,” and “proximity to the Urban Growth Boundary,” as shown in Figures 4.2-1 through 4.2-3 (pp. 110-111), respectively. It is important to recognize this also is true for each county, not just the region as a whole.

4.2.1.3 Impacts of Stay the Course (No Action Alternative)

No comment.

4.2.1.4 Impacts of the Transit Focused Growth Alternative

The major differences with the Stay the Course alternative listed are important:

“More compact development patterns would be present near high-capacity transit throughout the region and Less development would occur in Cities & Towns, Urban Unincorporated, and Rural geographies as well as in proximity to natural resource lands and critical areas.” However, we would add that the Transit Focused Development alternative also has the least impacts on the growth of GHG emissions and, thus, is best for combating climate change.

4.2.1.5 Impacts of the Reset Urban Growth Alternative

No comment.

4.2.2 Cumulative Effects

The challenges listed that jurisdictions face—and will continue to face—are real, but can be handled with proper planning and laws. However, if those same jurisdictions do not c

[Commenter\(s\):](#)

The Wilderness Society

Communication ID: 354846

04/29/2019

April 29, 2019

Puget Sound Regional Council

1011 Western Avenue, Suite 500

Seattle, WA 98104

Sent via email to: VISION2050SEIS@psrc.org

Re: Public Comment for VISION 2050 Draft Supplemental EIS

To Whom It May Concern:

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Statement (DSEIS) for VISION 2050. As the DSEIS aptly lays out, we are at a critical time of change here in the Puget Sound region with an intimidating forecast for adding nearly 2 million more people in the next 30 years. VISION 2050 will set the policy framework to determine how and where we grow and provide a blueprint for sustaining a healthy environment, thriving communities, and a strong economy. It is critical that we get this right and work efficiently and thoughtfully to upgrade our transportation systems, protect more parks and open space across the region, and develop new tools and policies to help our communities thrive. The Wilderness Society would like to offer support for the transit-focused growth alternative presented in the DSEIS. We believe this alternative will promote more sustainable growth and set the region forward on the right path to meet the growth challenges of the next 30 years.

Through The Wilderness Society's (TWS) Urban to Wild Initiative, we are working with partners across the region to close gaps and address inequities in the regional parks and open space network and facilitate connections to nature through creative transit and policy solutions and partnerships. Ultimately, we advocate for programs, policies, and investments that improve the health and well-being of local communities to ensure everyone can enjoy local parks, public lands, and the wilderness beyond. Through this lens, TWS would like to see a VISION 2050 Transit-focused Growth Alternative specifically:

Incorporate all the recommended policies and actions in the 2018 Regional Open Space Conservation Plan (ROSCP) into the Preferred Alternative. The ROSCP provides a thorough and extensive summary of recommended policies and actions that can support the growth of a regional open space network throughout the region. This work is more important than ever to ensure we protect farmland and high-priority conservation lands and support the development and new parks and open space in our growing cities, with special attention to and prioritization of areas with historic disinvestment.

2. Define an ambitious set of Multicounty Planning Policies (MPPs) that can accelerate the conservation of nearly 500,000 acres of open space lands defined as "at-risk" through in the ROSCP. More must be

done to accelerate open space conservation efforts across the region. Developing a broad set of MPPs that support protection efforts at the local jurisdictional level is a critical platform to accomplishing this ambitious goal.

3. Provide an in-depth analysis of displacement risk and anti-displacement strategies that may serve as a tool for local jurisdictions for planning and policy development efforts. With a transit-focused growth alternative, “equity geography” areas—especially in King County—stand to be displaced through the forces of gentrification if local jurisdictions are not intentional about how to ensure equitable development. PSRC must provide a strong foundation of policies and tools to support local jurisdictions as they grapple with these growth challenges.

Thank you for the opportunity to provide comment on the DSEIS. We look forward to the selection of a preferred alternative and engaging in the public comment process and public engagement sessions. Feel free to contact me at [phone number, email address] for any further information.

Sincerely,

Kitty Craig

Washington State Deputy Director

Urban to Wild Initiative Lead

[Commenter\(s\):](#)

The Wilderness Society, Kitty Craig

Regional Government/Agency

[Alderwood Water & Wastewater District](#)

[Communication ID: 354331](#)

[04/24/2019](#)

April 24, 2019

Erika Harris, AICP Senior Planner

Puget Sound Regional Council

1011 Western Avenue, Suite 500

Seattle, WA 98104-1035

RE: Vision 2050 Draft SEIS Review Comments

Dear Ms. Harris:

Thank you for the opportunity to review the Draft Supplemental Environmental Impact Statement (SEIS) for Vision 2050. In general, the SEIS addresses a broad range of concerns associated with Vision 2050, and the Alderwood Water & Wastewater District offers the following comments:

Ecosystems - Sections 2.7 and 4.5

- Section 2.7.3 Relevant Plans, Studies, and Court Rulings, cites several key findings from the 2016 State of Salmon report including the fifth bullet at the top of page 46:

Toxic chemicals are concentrating in the water and entering the food chain. Low oxygen caused by nitrogen discharged from septic tanks, sewage treatment plants and other sources threatens Puget Sound.

We believe that this information is incomplete and should be expanded to include stormwater to accurately portray the findings of the State of Salmon work. The updated 2018 report on the State of Salmon web site

(<https://stateofsalmon.wa.gov/puget-sound/water/>) is even more specific in

identifying stormwater as a major source of toxic pollution in the Puget Sound:

In Puget Sound, 45 percent of river systems show levels of toxic chemical pollution that increase health risks to juvenile Chinook salmon. As they grow, Puget Sound Chinook salmon accumulate toxic chemicals, which poses health risks to predators, including southern resident orca whales. Most toxic pollution in the Puget Sound is carried by stormwater that runs off paved roads and driveways, rooftops, yards, and other developed land. These contaminants can reduce growth, increase disease susceptibility, and alter hormone production, all of which can reduce survival of fish.

This emphasis on stormwater as the primary vector for pollution in Puget Sound is significant. The current regulatory stance towards point source dischargers such as wastewater treatment facilities does not factor in the significantly greater impact to water quality from stormwater, and thus is clearly not focusing limited resources towards the greatest positive benefit.

- Development continues to impact Puget Sound water quality and the 2016 State of Salmon report supports this by identifying "Poorly Managed Development" as a challenge associated with the growing human population, specifically

"Development that results in habitat loss", "Poor water quality in area streams resulting from increased development": and "Forest and agricultural practices." The growth alternative selected will not necessarily make a difference in the impact to the Puget Sound water quality - and the health of salmon and orca populations - but the way development is managed and carried out certainly will. Development should be carefully managed to not only avoid further adverse impacts to sensitive ecosystems but also encouraged to correct damage done by prior development activities.

Public Services and Utilities - Sections 2.9 and 4.7

- The introductory paragraph of Section 2.9 states that "...counties, cities, and towns have continued to plan for and provide public services and utilities that accommodate an increasing population..." This list should be expanded to include special purpose districts. Numerous special purpose districts in the Puget Sound Region provide services related to the issues covered in Section

2.9 including Utilities, Transportation, Ports, Fire, Schools, Conservation, Diking

and Drainage, Public Health and Hospitals, Public Housing, and Public Facilities. These districts are a vital part of planning for and providing essential services for an increasing population.

- Section 2.9.2 Water Supply Considerations identifies surface water as a primary water supply source in King, Pierce, and Snohomish counties. The surface water in these counties comes from four different watersheds: Cedar and Tolt Watersheds (Seattle Public Utilities); Green River Watershed (Tacoma Water); and the Sultan River Watershed (City of Everett). Although Section 2.9.2 briefly mentions climate change impacts to the water supply and also references Section 2.8.2 Climate Change and Sea Level Rise, neither of these sections mentions the impact of increasing wildfire risk and insect and tree disease outbreaks (SEIS Section 2.7.4) on the watersheds contributing to the public

water supply. Wildfires, insect infestations, tree disease, land development,

recreation, and other activities that have the ability to alter forests within these watersheds also have the ability to significantly impact the quality and quantity of drinking water available.

- Section 2.9.2 also notes that water quality degradation may be a result of climate change; we may be beyond 'may' as raw water reservoirs for Everett, Seattle,

and Tacoma are each experiencing a warming trend. This gradual warming of the raw water reservoirs results in changes to the biology of the water, leading to impacts to taste and odor which current treatment infrastructure is not designed to address.

- Also in Section 2.9.2, water consumption for the years 2000 and 2015 are mentioned. Based on a quick check with staff at Everett Public Works, the numbers in the supporting table (Public Water Supply by County) in Appendix B don't appear to be accurate.

- Service area boundaries are often determined by lot line locations, roadway corridors or corporate/agency boundaries. However geographic constraints like hills, valleys and waterways often have a much bigger impact on service affordability and ecological impacts with services like water, sewer and storm. Table 4.7-1 should be amended to encourage service providers to work collaboratively to provide the most affordable utility services to customers while minimizing adverse impacts.

Sincerely,

Jeff Clarke, General Manager

[Commenter\(s\):](#)

Alderwood Water & Wastewater District, Jeff Clarke

Community Transit

Communication ID: 354804

04/29/2019

Erika Harris, AICP, Senior Planner

SEPA Responsible Official

Puget Sound Regional Council

1011 Western Ave., Suite 500

Seattle, W A 98104

April 25, 2019

Re: Puget Sound Regional Council's Vision 2050 Draft Supplemental Environmental Impact Statement
Dear Ms. Harris:

Community Transit appreciates the opportunity to provide comment on the Draft Supplemental Environmental Impact Statement (DSEIS) for the Puget Sound Regional Council's (PSRC) Vision 2050. We have been actively engaged with our Snohomish County Tomorrow (SCT) partners in evaluating regional strategies for growth and we concur with SCT's recommended approach regarding Vision 2050 growth alternatives.

Community Transit is pleased that PSRC incorporated strategies to leverage major regional transit investment in Snohomish County. Our second Swift bus rapid transit (BRT) line opened on March 24, 2019. This \$73 million project established the first high capacity transit network for the County. Future Swift BRT projects will also connect with Sound Transit's Link Light Rail, when it extends to Snohomish County in 2024 and Everett in 2036.

Community Transit supports the new regional geography for High Capacity Transit Communities. This new geography better reflects current development patterns and planning for future high capacity transit investments. Community Transit recommends the Transit Focused Growth Alternative as the preferred alternative, and supports SCT's requested minor modifications to population distribution, as proposed in their DSEIS letter. The Transit Focused Growth Alternative provides the land use intensities needed to support high capacity transit service, while at the same time encouraging active transportation options with a better balance of jobs and housing. This alternative builds on and reinforces the connection between land use and major transportation investments like Swift BRT and Link light rail. We believe this strategy will also provide more opportunities for social equity by prioritizing housing in close proximity to frequent transit service, potentially reducing household transportation costs.

In addition to our general comments, Community Transit staff prepared specific comments on the DSEIS, attached below.

Thank you again for the opportunity to provide comments for the environmental review of Vision 2050. Please feel free to contact me if you have any questions.

Sincerely,

Emmett Heath

Chief Executive Officer

Community Transit, PSRC Vision 2050 DSEIS Comments:

Page 16, Table 2.2-1 Major Employers for Snohomish County: "Edmonds City College" is actually "Edmonds Community College."

Page 30, Transit Oriented Development: Community Transit's bus rapid transit station planning area is 1/2 mile, not 1/4 mile. Did the estimates for housing and population around TOD in Snohomish County include both Swift Blue Line (Highway 99) and Swift Green Line (Boeing to Canyon Park via Airport Rd, 128th, 132nd and SR-527) lines or just Swift Blue Line?

Community Transit's Swift Green Line launched on March 24, 2019 and operates between the Everett Boeing/Paine Field Manufacturing Industrial Center and the Bothell/Canyon Park Regional Growth Center.

Page 33, please consider using different color lines for Bus Rapid Transit and Major Roadways. With the scale of the map, it is difficult to differentiate these future networks.

Page 67, Figure 2.13-1 Historic Sites: the map is missing the entire City of Snohomish Downtown Historic District.

Page 84, Table 3.1-5, Actual and Forecast Employment Growth Share by County: do the Snohomish County employment figures include the estimates for the locally and county-adopted Arlington-Marysville Manufacturing Industrial Center?

Page 123, Table 4.3-3 Potential Mitigation Measures, Transportation: Community Transit's Board of Directors adopted a Low Income bus fare on April 4, 2019. The new fare begins on July 1, 2019. Community Transit also strongly supports, "Encourage dedicated transit lanes." This supports the previous measure of, "Consider new and more frequent transit."

Page 154, Section 4.14 Noise: does the analysis account for the recently opened Paine Field Passenger Terminal?

Commenter(s):

Community Transit, Emmett Health

Joint letter: Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC

Communication ID: 354668

04/29/2019

VISION 2050

Draft Supplemental Environmental Impact Statement (SEIS)

Public Comment

April 29, 2019

EPCA, GMVUAC, GV/LHA, HHA, and UBCUAC

To: Erika Harris—PSRC Senior Planner, SEPA Responsible Official

Subject: Comments—Draft VISION 2050 Supplemental Environmental Impact Statement

King County's Unincorporated Area Councils (UACs) and Unincorporated Area Associations (UAAs) — Enumclaw Plateau Community Association (EPCA), Green Valley/Lake Holm Association (GV/LHA), Greater Maple Valley Unincorporated Area Council (GMVUAC), Hollywood Hill Association (HHA), and Upper Bear Creek Unincorporated Area Council (UBCUAC) are pleased to submit a set of detailed comments herein on the subject SEIS.

We fully support the broad goals of the Growth Management Act (GMA) as expressed on p. 3 of the subject SEIS: Managing urban growth; Protecting agricultural, forestry, and environmentally sensitive areas; Reducing sprawl; and Encouraging efficient multimodal transportation systems

We believe public policy can provide direction and incentives for communities to grow in ways that will invite personal lifestyle decisions that are consistent with the region's goals. We also firmly support policies that strive to keep the Rural Area rural. Ways to ensure same included recognizing Urban Growth Boundaries are intended to be permanent, not fungible, and that Rural Areas provide benefits in many ways for everyone, including the residents of Urban Areas.

The only alternative detailed in the subject SEIS that supports both the GMA's broad goals expressed above and our strong objectives to keep the Rural Area rural is the "Transit Focused Growth" alternative. The advantages of the "Transit Focused Growth" alternative are abundantly clear from PSRC's analyses, with which we agree. The other two alternatives—"Stay the Course" and "Reset Urban Growth" would set our region back in many areas and should not be pursued.

We have noted key concerns to be addressed at a variety of governmental levels—State, Region, and County. Of these, the issue we consider critical is Transportation Concurrency. There remain deficiencies in the RCWs, in implementation at the County and City level, and in the total lack of any enforcement mechanisms. These render Concurrency, though great in theory, moot in practice and not what it was intended to accomplish—infrastructure keeping up with growth.

We request you give due consideration to our detailed comments herein, as they represent the concerns of a vast majority of King County's Rural Area. Thank you.

Peter Rimbos [email address] Co-Coordinator, VISION 2050, GMVUAC

Mike Birdsall [email address], GMVUAC Co-Coordinator, VISION 2050, GMVUAC

Nancy Merril [email address], President, EPCA

Gwyn Vukich [email address], President, GV/LHA

Steve Hiester [email address], Chair, GMVUAC

Michael Tanksley [email address], President, HHA

Nancy Stafford [email address], Chair, UBCUAC

cc: Dow Constantine, King County Executive: [email address]

King County Council: [email address]

John Taylor, Director, King County Dept. of Local Services: [email address]

Paul Inghram, PSRC, Director of Growth Management: [email address]

Ivan Miller, Comprehensive Planning Manager, King County: [email address]

EXECUTIVE SUMMARY [<https://www.psrc.org/sites/default/files/v2050-dseis-execsummary.pdf>] (pp. ES-7 - ES-19)

Regional Geographies

We strongly support the PSRC's proposed new categorization system called: "regional geographies" to classify cities and unincorporated areas by roles and types:

- Metropolitan Cities
- Core Cities
- HCT (High-Capacity Transit) Communities
- Cities & Towns
- Urban Unincorporated Areas
- Rural
- Resource Lands
- Major Military Installations

This hierarchy better defines and more carefully recognizes the differences among such varied "geographies" and, thus, will allow a better allocation of resources to fill infrastructure needs.

Alternatives

The three alternatives under study are:

- “Stay the Course” — [a direct extension of the VISION 2040 Regional Growth Strategy and assumes a compact growth pattern, focused in the largest and most transit-connected cities in the region with designated regional growth centers.]—We believe this can and must be improved upon.
- “Transit Focused Growth” — [considers a compact growth pattern based on the VISION 2040 Regional Growth Strategy that assumes accelerated growth near the region’s existing and planned transit investments in Metropolitan, Core, and High-Capacity Transit (HCT) Communities, with less growth in the outlying areas.]—We believe this offers the best opportunities for the region.
- “Reset Urban Growth” — [is based on VISION 2040 and shares similarities with actual growth patterns that occurred from 2000 to 2016 and assumes a more distributed growth pattern throughout the urban area, but with more growth in outlying areas.]— We believe this would be a major setback for the region and not set it on the right course moving forward.

Observations (ref.: Table ES-1. Summary Comparison of Alternatives to Stay the Course) We recognize the three alternatives studied in the SEIS produce differing environmental

impacts. While some impacts are similar for all the alternatives, some impacts are quite different, as summarized in Table ES-3 (pp. ES-16 - ES-19). What is most striking is that across all three alternatives, clearly the region, as a whole, will be less livable. That said, almost all the impacts

are least worst for the “Transit Focused Growth” alternative. Further, the “Transit Focused Growth” alternative has the Rural, Urban Unincorporated, and Cities/Towns showing the least growth. Clearly, for our organizations, which want to reduce sprawl, keep the Rural Area rural, and limit outlying cities to less growth, the “Transit Focused Growth” alternative is most attractive.

We also are confused by the rationale to define the “Stay the Course” alternative as the “no action” alternative when the “Reset Urban Growth” alternative is a much closer fit to the trends of actual growth from 2000 to 2017, as explained in Appendix C: Modeling Methodology and Analyses Tools. We believe the “Reset Urban Growth” alternative should be defined as the “no_action” starting point and, then, assess the “Stay the Course” and “Transit Focused Growth”

alternatives as points of departure from it—with the latter being more extensive than the former.

Concerns (ref.: Table ES-2. Impacts Common to All Alternatives)

Of the impacts common to all the alternatives we are concerned with the following specific impacts and for which long-term mitigation is critical:

Population, Employment, Housing, and Land Use

- Population and employment growth in less-developed and rural areas would result in lower-density land uses and potential development pressures on natural resource lands

— What policies can be strengthened to minimize development activity in the Rural

Areas and directly adjacent cities and towns?

Transportation

- The average time people spend in congestion each year is forecast to increase

—What changes to the Regional Transportation Plan are needed to alleviate this outcome?

Ecosystems

- Activities associated with development, including clearing, grading, vegetation removal, and conversion of land to impervious surface would have adverse impacts to ecosystem resources such as fragmentation and degradation of habitat

—This is a serious issue for the region for reasons such as salmon and orca survival, and must be mitigated by vigorous and continuous policy support.

Water Quality and Hydrology

- Amount of impervious surface would increase as a result of added development, which may alter stormwater hydrology, reduce aquatic habitat, and degrade water quality

—This also is a serious issue for the region, and must be mitigated by vigorous and continuous policy support.

Parks and Recreation

- For both local and regional parks, recreation, and open space resources, growth would lead to increased use, which could lead to degradation of the recreational experience, potential degradation of natural and open space resources, and increased conflicts between users

—As Rural Area residents already experience this impact regularly, what mitigation can be provided?

Visual Quality

- Development in existing outlying and rural areas would potentially convert undeveloped spaces to other uses and may not be consistent with community visual character

—This is best mitigated by attention to prevention of such development in the first place (see Population, et al, above).

Our comments/questions above refer to mitigation due to the lack of meaningful mitigation discussed in the draft SEIS. There are general types of mitigation described in various tables, but no indication of any specific commitment to implementation, nor to the effectiveness of mitigation options. Such commitments should be part of the choice of alternatives.

Advantages (ref.: Table ES-3. Summary Comparison of Alternatives Impacts)

We see the following relative advantages for the “Transit Focused Growth” alternative as compared to the “Stay the Course” alternative, although the outcomes for both alternatives are will be dependent on the specific mitigations implemented:

Land Use

- 6% (vs. 9%) of growth throughout the region occurs in proximity to urban growth boundary

- 75% (vs. 48%) of population and employment growth occurs near high-capacity transit

Transportation

- Reduced average travel times

Ecosystems

- Less growth to areas with regionally significant habitat, reduced impacts

Water

- Less impervious surface added to region

Public Services and Utilities

- Less growth in outlying and rural areas may reduce the need to construct or expand facilities near open spaces, decreasing impacts

Parks and Recreation

- 59% of population would be near parks in 2050

Visual Quality

- Less development in outlying and rural areas would slightly reduce negative impacts to these areas

Introduction [<https://www.psrc.org/sites/default/files/v2050-dseis-chap1.pdf>] (pp. 1-8)

We support the following specific items from the Growth Management Policy Board's VISION_2050 desired outcomes.

- "Climate. Meaningful steps have been taken to reduce carbon emissions and minimize the region's contribution to climate change."

__—__ Much more should be done in this direction.

- "Economy. Economic opportunities are open to everyone, the region competes globally and has sustained a high quality of life. Industrial and manufacturing opportunities are maintained."

__—__ The Rural Areas do need more rural-centered economic opportunities, but not extensions of urban industrial activity into rural areas.

- "Innovation. The region has a culture of innovation and embraces and responds to change."
- "Mobility and Connectivity. A safe, clean, integrated, affordable, and highly efficient multimodal transportation system reduces travel times, promotes economic and environmental vitality, connects people, and supports the Regional Growth Strategy."

__—__ Yes, but "pass-through" urban-originated commuting traffic on county roads in the Rural

Areas is a continuing issue, which has drastically strained County roads budgets to the point that normal maintenance has been adversely affected.

- “Natural Resources. Natural resources are permanently protected, supporting the continued viability of resource-based industries, such as forestry, agriculture, and aquaculture.”

_—_In addition, we must not lose sight of mitigation and cleanup responsibilities we must ensure occur to restore areas that have been depleted or degraded.

- “Resilience. The region’s communities plan for and are prepared to respond to potential impacts from natural hazards and other adverse events.”
- “Rural Areas. Rural communities and character are strengthened, enhanced, and sustained.”

_—_We fervently support this vision, but surrounding growth continues to build strong pressures on the Rural Areas.

2. Affected Environment [<https://www.psrc.org/sites/default/files/v2050-dseis-chap2.pdf>] (pp. 9-74)

We agree with the assessment of “What are some of the key regional changes in the last decade?” However, we would caution planners to recognize that “Transit infrastructure around the region is expanding, and transit ridership is increasing” is very locational-dependent. For example, in the outlying cities and Rural Areas of King County transit options are extremely limited or non-existent, yet there are many commuters that use the few main arterials available creating daily congestion far and wide.

2.1 Population (pp. 10-13)

In looking at Appendix B, the data that supports this section, it is difficult to discern what methodology and assumptions were used in developing population forecasts out to 2050, especially population distribution among cities. We remain concerned there is too much left up to subjective decisions. For example, how were growth targets used, if at all? This is important as some outlying cities in King County, e.g., Black Diamond and Covington plan to exceed their Growth Targets. In the case of the former, grossly exceed. For the latter, we understand PSRC already has imposed conditions as part of its certification of the city’s Comprehensive Plan. This is not where the PSRC or our organizations want to see growth, especially when it is not accompanied by jobs and transit, thus imposing even more pressure on already-strained existing transportation infrastructure and directly threatening the rural way of life.

2.2 Employment (pp. 14-17)

An issue not addressed is that today jobs in the Rural Areas, generally, do not pay enough for the residents of the community to be able to afford the housing, such that they must live and commute from outside the area.

We have a concern about heritage family businesses located in the Rural Areas. These family-run businesses help promote a strong and viable community. If over-development is allowed in the Rural Areas, then land values invariably rise to the point that these families have to sell their businesses and move. Resulting in the loss of family-run businesses to the local communities.

2.3 Housing (pp. 18-22)

The high cost of housing—affordability—is a critical issue for the region—as a whole. Quality of life is jeopardized to varying degrees for most families. It forces many to move farther away from their jobs and commute longer distances, which adversely affects the entire region.

In addition, in several urban areas, where there is a focused effort to accommodate density in downtown cores, a high quantity of individual units are being built, with not as much focus on quality—as in the kind of places people would want to live. There needs to be a better balance between quantity and quality, if accommodating more density is to work in the long run. Just adding more small units near transportation hubs cannot be the universal response to these efforts, if we want these urban villages to be desirable places to live for a variety of people.

2.4 Land-Use (pp. 23-31)

2.4.1 Regional Land Use

Without the context of location, it is hard to assess the following statements:

“Figure 2.4-3 shows parcel sizes in the region’s rural areas. The distribution of parcel sizes is similar to that in the VISION 2040 FEIS, showing that parcels smaller than five acres are the dominant size and are located throughout the land designated as rural. Of the rural parcels that are less than 5 acres in size, about 60,000 are vacant, indicating the potential for substantial future rural development.”

For example, where are those “vacant” “60,000 parcels” in the Rural Area? Which counties possess the most? We do not want, nor would we expect the PSRC to want, “substantial future rural development.” However, we do recognize and support that legal lots can be developed.

2.4.2 Regional Growth Centers and Manufacturing/Industrial Centers

We continue to support these Regional Growth Centers (RGCs), as they allow for both jurisdictions and businesses to better plan their land-use decisions. However, we remain quite alarmed that King County has designated Industrial-zoned sites in its Rural Area which are completely incompatible with the surrounding Rural Character and violate the intent and purpose of the Growth Management Act.

Regarding Figure 2.4-4 (p. 29) we do question whether some of the RGCs have efficient multimodal transportation options. It would help if the RGC map also included areas of high growth rates of housing and vehicular traffic. This would provide an early warning of potential problem areas.

2.4.3 Transit-Oriented Development

The trend towards more Transit-Oriented Development should continue, as it leads to the most efficient use of land and infrastructure funds.

2.5 Transportation (pp. 31-38)

2.5.1 Transportation System Capacity Improvements

The first sentence under the section title states: “The Regional Transportation Plan contains a variety of planned investments to increase mobility, both at the local and regional scale.” It goes no further to explain this variety of planned investments or to confirm the level of confidence in

obtaining these funds. Worse, there is no accounting for mitigation needs that should be added to the Regional Transportation Plan (RTP), approved in 2018, to offset the growth forecast for 2040 to 2050. An honest presentation of the major changes to the RTP that each alternative will require is a key piece of information needed to make an informed choice.

We remain extremely wary of the impacts of pass-through commuter traffic from cities inside the Urban Growth Area along inadequate and overwhelmed county roads in the Rural area to get to jobs in other cities in the Urban Growth Area. King County has insufficient funds to maintain its vast network of roads. This problem has been getting worse every year with no apparent solutions that satisfy all parties. Cities must help pay to maintain county roads their citizens and businesses use everyday.

2.5.2 Transportation System Efficiency Improvements

The first sentence under the section title states: “Transportation system efficiency improvements include strategies for enhancing system efficiency and mobility without adding capacity to the system.” We agree that simply adding more lanes is not a long-term solution, but solutions should be explored that encompass, by all means possible, the true goal: alternatives to driving alone.

While we support the efforts to shift trips out of peak-travel periods or eliminate the need for trips, it should be recognized there are requirements placed upon many people by their employers. In addition, when it comes to the Rural Areas—which we understand is a small percentage of the four-county population—employment opportunities are few and far between; consequently, asking many people to walk or take a bike to work, simply ignores reality. We suggest that a more helpful action would be to expand the commuter bus network so that people in Rural Areas and outlying Cities and Towns have real alternatives to driving alone. Such an expansion should also provide for secure parking facilities as such commuters often have to travel long distances to catch a bus.

The draft VISION 2050 SEIS appears to place all adaptability and responsibility on the individual citizen, but employers too must be adaptable.

We support advancements in transportation, but it is difficult to assess potential impacts of untested technology that is not in common usage at this time.

2.6 Air Quality and GHG Emissions (pp. 39-42)

2.6.2 Greenhouse Gas Emissions and Climate Change

There are several listings of GHG emission reduction targets adopted by King County, PSCAA, and the State, yet they all differ. Although the PSRC has no control over such legal decisions by various jurisdictions and agencies, it must be recognized that such differing targets not only do not support each other, but probably will not stem the worst effects of human-accelerated climate change.

Further, the Regional Transportation Plan’s (RTP’s) Four-Part Greenhouse Gas Strategy is being systematically undermined by the Federal government’s rollback of fuel economy and greenhouse gas standards for passenger vehicles and trucks.

2.7 Ecosystems (pp. 43-48)

2.7.3 Relevant Plans, Studies, and Court Rulings

Although the following statement generally is true:

“Toxic chemicals are concentrating in the water and entering the food chain. Low oxygen caused by nitrogen discharged from septic tanks, sewage treatment plants, and other sources threatens Puget Sound.” (p. 46)

We would like to have reflected here that there is no known data or correlation between onsite sewage systems in the Rural Areas and ‘low oxygen’ levels in regional surface waters, including Puget Sound. Proper location, operation, and maintenance of onsite sewage systems do not contribute to this issue, and any statement or assertion to the contrary should be corrected. [Please note: SB 5503, Section 1, signed by Governor Inslee on April 17, 2019, and effective July 28, 2019 (Laws of 2019, Chapter 50).] With the Rural Areas growing so slowly, as the GMA intended, VISION 2050 should not recommend any additional restrictions or limitations being placed on onsite sewage systems located in the Rural Areas.

2.7.4 Climate Change

We share concerns expressed here in terms of adverse impacts to wildlife habitat, forests, biodiversity, and water acidification and how this will affect Rural Area ecosystems and residents.

2.8 Water Quality and Hydrology (pp. 48-53)

2.8.1 Impervious Surfaces

The last sentence of the first paragraph states: “In addition, redevelopment of areas with outdated stormwater infrastructure can result in improvements to water quality through upgrades and improvements to stormwater management.” We would add: “, including emphasizing conservation and redirection (or repurposing) of water flows to wetland and wildlife basins to promote water resource recycling, cleaning, the recharging of the aquifer, and for natural areas, parks, and/or recreation purposes.”

Currently, a high percentage of impervious surface area run-off is piped away and discharged quickly into corridors which flow to the sea and provide little for wildlife. Also, there are conflicting use pressures along critical water supply corridors, such as the location of industries along the

Cedar River corridor in the Rural Area which remove existing vegetation and add impervious surfaces.

2.8.3 Policies and Regulations

We believe the recently established Watershed Restoration & Enhancement (WR&E) Committees are a good idea, if these efforts reasonably address and protect the use of groundwater in the Rural Areas for single-family homes and small farms (see: <https://ecology.wa.gov/Water-Shorelines/Water-supply/Streamflow-restoration/Streamflow-restoration-planning>). Unfortunately, Rural Area residents have been excluded from these WR&E Committees which will directly affect watersheds in which they live and unfairly overpopulate these Committees with urban representation. Although this is a State issue, the PSRC could exert influence in the region to ensure the public is fully represented in such planning activities, as these issues will only be exacerbated with the influx of so many more people into the region, especially where large municipal groundwater withdrawals for water supply

far exceed and, in fact, compete with residential use in the Rural Areas (e.g., City of Kent well field in the Maple Valley “Four Corners” area).

2.10 Parks & Recreation (pp. 56-61)

2.10.5 PSRC Regional Open Space Conservation Plan

We participated in the review and comment on the PSRC Regional Open Space Conservation Plan and support it.

2.11 Environmental Health (pp. 61-64)

We remain concerned about contaminated sites in the Rural Areas and the intent to grant permits for isolated Industrial-zoned parcels in the Rural Area, especially in King County where a major asphalt facility is being moved from inside the Urban Growth Boundary (the City of Covington) to the Rural Area along the Cedar River. Urban or Urban-serving facilities have no place in the Rural Areas simply because the land may be less expensive to the permit applicant.

2.13 Historic, Cultural, & Archeological Resources (pp. 66-67)

The viability of historic, cultural, and archaeological resources is increasingly at risk due to injudicious and often ill-considered development throughout the Rural Areas. Among many examples is the King County-designated Green Valley Road Heritage Corridor, one of nine such Roads and home to the Neely Mansion, listed on the National Register of Historic Places. Massive developments are planned and construction has begun in the adjacent Urban Area. Although only in its nascent stages, the resulting impacts have caused and will continue to cause undue pressures on these unique and beloved community landmarks. Such imprudent development results in increased traffic, difficulty in accessibility and other issues which include safety concerns, that place the viability of such exceptional cultural/heritage and tourist venues at risk. This area is also home to one of five King County-designated Agricultural Production Districts (APDs), all of which also have significance as cultural and historic venues, especially intergenerational family farms. Plans for motorsports racetrack expansion adjacent to the historic Soos Creek Salmon Hatchery will place further undue hardship on nearby areas.

We strongly support careful consideration of all areas adjacent to the urban fringe. We also urge limits on development and careful consideration in planning and permitting in localities where there is close proximity and/or impacts to King County-designated Heritage Corridors, APDs and increasingly-endangered Rural Area historic, cultural and archaeological resources.

We find very few Rural Area sites identified in Figure 2.13-1. Historic Sites (p. 67). There is no lack of eligible venues, e.g., there are a number of agricultural buildings in the Greater Puget Sound area that date to the 19th century. One of the oldest buildings in King County is an 1879 barn along the Green Valley Road Heritage Corridor built by one of the earliest settlers in SE King County. Unfortunately, especially in the unincorporated areas, there is a general lack of funding to designate buildings, sites, and areas as places of historic significance.

2.14 Visual Quality (p. 68)

In the Rural Areas, Visual Quality is very important to local residents, as well as visitors from Urban Areas. Often, if high quality is lost, it is difficult or impossible to retrieve. Coordination with Rural Area residents—who are most familiar with and have interest in preserving visual quality—when changes are being planned, would help preserve high quality from unfortunate loss to all.

2.15 Earth (pp. 68-69)

Figure 2.15-1. Regional Geologic Hazard Areas (p. 68) appears to be incomplete. Rural Area residents have experienced flooding along the Cedar River between the cities of Renton and Maple Valley; there are many more fault lines that we have gathered from multiple sources; and the Cedar River canyon's steep slopes have recently experienced multiple landslides directly impacting SR-169. Yet, none of this is indicated on the map.

2.16 Noise (p. 70)

There is no discussion of noises common to the Rural Areas and its impact on residents and the surrounding environment.

Unfortunately, the following section (2.17) does not even mention noise regulations adopted since VISION 2040, further prompting a need to look at whether current regulations are appropriate and address the increased noise from new development and traffic congestion in both the Urban and Rural Areas.

However, in the Rural Areas the biggest concern is enforcement. Noise complaints from Rural Area residents yield very little relief. In King County, Public Health ignores noise as a detriment to health; the Sheriff's Office doesn't prioritize enforcement of existing laws; government representatives at all levels pass noise limits, but then do not adequately fund enforcement; and the Department of Local Services Permitting Division continues to allow housing in high-noise areas (e.g., along highways or busy thoroughfares), or allows high-noise commercial operations in/near residential zoned areas (e.g., Pacific Raceways, Buckley Recycling, Asphalt Plants, etc.).

Such problems could be rectified by requiring mitigation on the permitting of any noisy business that calls for minimizing noise impacts on nearby residential areas with physical noise walls, hours of operation, etc. Annual business license approvals would help ensure such mitigation is being properly followed.

2.17 How Has the Regulatory Setting Changed Since VISION 2040?

We remain concerned that not all city Comprehensive Plans have been updated since 2008. A case in point is the City of Black Diamond, which is planning to quintuple in population in the next 10 to 15 years, yet still hasn't completed its "2015" Update to describe how it plans to accommodate such mega-growth and its adverse impacts on neighboring communities.

3. Alternatives Evaluated [<https://www.psrc.org/sites/default/files/v2050-dseis-chap3.pdf>] (pp. 75-96)

In reviewing the opening of this chapter and how growth projections were developed, we remain troubled by how inconsistently growth management principles are applied across King County. For

example, there are some cities that are not meeting their Growth Targets, while there are others that plan to exceed (or grossly exceed) their Growth Targets.

Numerically, these might cancel out, but desirable growth and where it can be best accommodated is very location dependent. To reduce sprawl and ensure the best use of infrastructure monies, it is desired to ensure that cities near major employment centers and best served by transit at least meet their Growth Targets, if not exceed them; while cities far from major employment centers and least served by transit should not exceed (or worse, grossly exceed) their Growth Targets.

Unfortunately, this is not happening and policies should be re-evaluated to see what can be done to ensure the desired outcomes as outlined in the overall regional growth strategy.

3.1 How the Alternatives Were Developed (pp. 77-85)

The information in Appendix C: Modeling Methodology and Analysis Tools relies on a series of many key assumptions. While we understand that making assumptions is part of such modeling and analyses, it should be recognized, possibly through a series of sensitivity studies, how dependent some of the results thereof are to small changes in such assumptions. For example, population growth and job growth assessments were made using sophisticated models and tools, but according to a variety of assumptions about how those models would be exercised. While we understand many assumptions are made when developing/running models and conducting analyses, what is lacking is sufficient information to allow a reader to understand the scope of those assumptions, and the range of possible alternative assumptions. Consequently we recommend the following questions be addressed:

1. What is the minimum/maximum development capacity in each of the regional geographies?
2. What would be the maximum range of alternative growth patterns?
3. How confident can we be that each alternative would materialize under current policies and plans?
4. What new or changed policies and/or legislation is needed to achieve the vision provided by each alternative?

3.2 Stay the Course (No Action Alternative) (pp. 85-87)

Clearly, the current “course” does not work for existing growth and would be even worse for the projected growth coming to the area. Therefore, maintaining that same course into the future is not a strategy we would support.

3.3 Transit Focused Growth Alternative (pp. 87-89)

We believe this is by far the best alternative in terms of transportation infrastructure efficiency, quality of life, environmental impacts, and economic development—the “best bang for the buck.”

3.4 Reset Urban Growth Alternative (pp. 89-91)

It appears this alternative describes a continuation of historical trends which lead to inefficient sprawl. This actually is contrary to adopted regional plans. Further, to accommodate the projected growth to come, this alternative would result in much worse sprawl than contemplated by the

Growth Management Act. Consequently, we do not support it. The fact that historical trends to 2017 are in opposition to regional plans gives abundant proof that stronger policies and legally empowered enforcement are needed.

3.5 Alternatives Comparison (pp. 92-96)

The graphics herein directly support our statements above on the three alternatives. However, we note that none of the alternatives includes any factual mitigation for the impacts of growth added beyond 2040. The discussion of potential mitigation measures in Chapter 4 is quite generic and lacks many factual specifics. We recommend specific mitigation measures be included, especially in the area of transportation facilities and services to accommodate growth. Otherwise, it appears the region will continue to grow for another decade after 2040 with no offsetting mitigation and quality of life will suffer for all citizens as a result. The Growth Management Act requires that mitigation be provided as growth occurs.

As previously stated, there is no attention to the critically important issue of policy enforcement, to assure that Growth Targets are actually met and that mitigation actually occurs. None is more important than the matter of Concurrency under the Growth Management Act. We view Concurrency as practiced today as ineffectual and failing to achieve the intended result of “mitigation concurrent with development” in any practical sense. There needs to be a new direction for impact fees and Concurrency, probably established through State legislation. PSRC could serve the region well by developing such a new direction and working with the State legislature to make appropriate Growth Management Act changes. We see the need for State action on Concurrency as critical and long overdue.

In the long run we would like to see the following further improvements:

1. Transportation: Strive to decrease the percentage of trips made by driving alone, while increasing opportunities for walking, biking, and transit.
2. Water Quality & Hydrology: While we understand that water quality may suffer, unless adequately protected, with more population, we do need to make certain there is enough water period. Water supply in several areas (e.g., Ravensdale) is limited by a low water table with many wells going dry during a hot summer. We need to ensure water quantity and quality will be adequate in the Rural Areas 30 years out.
3. Parks and Recreation: Growth already is leading to “degradation of the recreational experience, potential degradation of natural and open space resources, and increased conflicts between users.” This is already occurring and directly affecting rural residents, such as in and around Tiger Mountain, where neighborhoods have been overtaken by urban recreational visitors and pass-through commuters—and it is getting worse each year. All counties, especially King County, must recognize the significance of the problem and budget accordingly to support the needs of rural residents. Or, “to protect rural residents from unwelcome impacts of urban growth not properly mitigated.”

4. Environmental Effects and Mitigation [<https://www.psrc.org/sites/default/files/v2050-dseis-chap4.pdf>] (pp. 97-156)

4.1 Population, Employment, and Housing (pp. 97-107)

4.1.1 Analysis of Alternatives

4.1.1.1 Impacts Common to all Alternatives

4.1.1.2 Comparison of Alternatives

Figure 4.1-1. Jobs-Housing Index, 2050 [p. 100], shows the Job-Housing Index's (JHI's) between the two "alternatives" to "Stay the Course" path are nearly identical (i.e., 1 - 2 percentage points difference—within the "noise" level of the assumptions). Whereas it's the "Stay the Course" path that has a measurable and, possibly, significant difference. But that difference exclusively favors King County at the expense of the other three counties, especially Kitsap (which, according to Table 2.3-1 [p. 19], is almost all dominated by single-family housing: 87% vs. KC's 56%).

So, at least from this JHI metric, the long-term economic vitality of those three counties could be improved by striving toward the paths laid out in the two alternatives.

In the Job-Housing Balance metric it is not explained how a home is used, or whether there is a home occupation or home-based industry. We believe this could affect this metric, at least as its is evaluated in the Rural Areas.

4.1.1.3 Impacts of Stay the Course (No Action Alternative)

It is alarming to see this alternative's large deficit of moderate-priced housing in King County, because it implies enormous pressure on the Rural Areas, especially developable lands near the Urban Growth Boundary, to supply that demand in King County rather than necessarily divert it to other counties. The result is likely to be further violation of planned growth targets, and a continuation of the sprawl that occurred from 2000 to 2017. To avoid such sprawl, strong growth-control measures must be enacted.

4.1.1.4 Impacts of the Transit Focused Growth Alternative

This alternative's distribution of growth by density is far preferable to Stay the Course, due to its smaller share of low-density housing and, thus, lessened impacts on the Rural Areas. However, as noted elsewhere, the numbers in Table 4.1-2 are merely assumptions. There needs to be an enforcement plan to assure that growth will be channeled in this direction, contrary to all past history.

4.1.1.5 Impacts of the Reset Urban Growth Alternative

At 33% low-density growth in King County, this alternative is the least desirable for the region and clearly so for the Rural Areas, where much more development would occur, in conflict with the desires of rural communities. Yet, this alternative is quite likely to materialize, because it reflects the reality of past trends. No matter what land use "vision" is adopted, this is what the marketplace will produce, unless the marketplace is guided by stronger legislation than now exists. There needs to be a mitigation plan to produce better outcomes than the region has seen in the recent past.

4.1.2 Cumulative Effects

We agree with the broad conclusion that: "the contribution of growth to climate change is inversely proportional to the compactness and density of new development." This provides further rationale for our support for the Transit-Focused Growth alternative.

4.1.3 Potential Mitigation Measures

Table 4.1-4. Potential Mitigation Measures: Housing and Employment (pp. 105-106) incorporates seemingly every desirable strategy that might have merit. As elsewhere, we ask for realism. For example, which of these mitigation strategies:

1. Will have the most benefit to the regional plan?
2. Will receive tangible priority when PSRC interacts with local governments?
3. Require changes in state law or local codes to be enforceable?

The track record of actual development patterns is clear: the regional plan for distribution of new housing and jobs is not being followed by the marketplace. Plans can be put in place to help change that trend.

We would add the following bullet to the part of Table 4.1-4 labeled "Topic: Support Regional Economy and Employment": "Provide a supportive environment for business start-ups, small businesses, and locally owned businesses." People who start a home-based business often do so because they have a passion for a particular area of interest. They have a need to create for themselves an income and a lifestyle, with some level of comfort. They do not necessarily exist just to provide "family wage jobs." In the case of building a business, misdirection, interference, and indifference in the community could result in the small business owner deciding to pack-up and leave for a better business environment.

4.2 Land Use (pp. 107-117)

We first provide some general comments. We appreciate the identification of rural lands as subject to adverse impacts under all alternatives due to unwanted development. While this may seem a minor side-issue to the region as a whole, it is a critical issue to rural residents. To avoid urban growth spilling over into the Rural Areas, the region should develop effective enforcement policies, or rural land will be irrevocably lost to the detriment of all.

Further, we have major concerns with the progress and success of past regional plans. Clearly, the "Stay the Course" alternative simply is the extension from 2040 to 2050 of the adopted 2040 regional plan policy principles for allocating regional growth down to local areas. Thus, it is called the "no action" alternative. The other two alternatives are variations thereof, designed to show what could happen if the VISION 2040 plan is modified in certain ways.

The "Reset Urban Growth" alternative represents the continuation of actual growth patterns observed 2000-2017, which have not followed the guidance of regional plans. There is much more development happening in the small cities and towns (Covington, Maple Valley, Black Diamond, etc.) and the unincorporated areas than the regional plan intends, and less growth than planned is happening in the denser core cities.

So, "continuing existing trends of growth" could be called the "no action" case in practical terms and the "Reset Urban Growth" alternative could be viewed as the "baseline" case. In this way, the "Stay the Course" alternative represents a set of policies to pursue some transit-oriented development as planned in the currently adopted VISION 2040 and the "Transit Focused Growth" alternative as a still more transit-focused growth plan.

One last point, since current development trends result from market realities, the planned alternatives envisioned will not happen unless the market gets shaped by much stronger controls on development than currently exist. Unfortunately, the "Reset Urban Growth" alternative is most likely to happen based on current market forces and that concerns us greatly.

4.2.1 Analysis of Alternatives

4.2.1.1 Impacts Common to all Alternatives

We strongly concur with in the general statement "some cities and counties may require updates to policies and regulations to accommodate the action alternatives or achieve the growth pattern in Stay

the Course.” Strong enforcement actions are called for in all cases, but we see little herein to give hope that such will occur.

We applaud the description of possibly adverse impacts on Rural Land if urban growth goals are not met. We recommend changing: “could potentially impact existing rural character ...” to:

“will adversely impact existing rural character ...” Similar concerns apply to Natural Resource Land and Critical Areas.

4.2.2 Cumulative Effects

We see major concerns here:

“As noted in the VISION 2040 FEIS, local jurisdictions may face challenges in improving their transportation and other infrastructure and facilities to accommodate planned growth. They also may face challenges with updating land use plans and regulations to support the anticipated growth pattern. If adequate infrastructure is not provided, this growth may lead to increased low-density development outside of the urban areas and into rural areas. If adequate levels of affordable housing are not provided in urban areas, this could also lead to undesired sprawl in rural areas. Likewise, if adequate zoning capacity to support growth is not available in urban areas, it may lead to greater development outside of the urban area. If Rural and Resource Land geographies lack land use protections, greater development of those lands than anticipated by the growth alternatives may occur.” (p. 115) Yes, local jurisdictions currently do and in the future will continue to face infrastructure and facility challenges. However, that is solvable if they would exercise their authority to ensure that new growth pays for new growth—that has not been happening as they have fallen further and further behind. This clearly is a failure to enforce GMA Concurrency—especially Transportation Concurrency. Should such failures by the cities occur, they should not serve as the rationale underlying any further enlargement of the Urban Growth Areas, especially with so many existing Potential Annexation Areas left un-annexed.

4.2.3 Potential Mitigation Measures

Regarding Table 4.2-1 (p. 116) under “Topic: Rural Lands, Resource Lands and Critical Areas”: Examples should be provided to support: “Promote programs that support rural based economic development consistent with rural character.”

The following is not clear: “Provide for agricultural-related accessory uses on agricultural lands.” We believe most of the acreage in the Rural Areas is zoned with a multitude of accessory uses already in the zoning code.

We see no practicality, nor desire, to implement the following mitigation measure listed in Table 4.2-1 (p. 116): “Reduce allowed densities in rural areas outside of clustered development and areas where growth is desired.” First, we do not support the urban-concept of “clustered development” in the Rural Areas. Second, implementing such measures as “reduce(d) allowed densities” would take major changes in zoning law, planning policies, regulations, etc. We support instead the mechanism of Transfer of Development Rights (TDRs).

Also in Table 4.2-1 (p. 116): “Partner with nongovernmental organizations to preserve natural resource lands.” We would like to see promotion of home-based occupations that are consistent with the Rural Area lifestyle and environment. The transfer of development rights (TDRs) from the Rural Area to existing Urban Areas should result in an overall lesser impact to the Rural Area. Use of private wells for single-family residential water supply in the Rural Area should: (a) continue to be exempt under and pursuant to RCW 90.44.050 and (b) not be subject to regulation, restriction, or limitation resulting from

the State Supreme Court’s Hirst decision and/or the legislative fix implemented under and pursuant to Ch 1, Laws of 2018 (ESSB 6091). Properly located, operated, and maintained onsite sewage systems in the Rural Area do not have an adverse impact on the water quality and biosystem of regional surface waters and Puget Sound, and thus should not be subject to any additional mitigating measures. Again, please note: SB 5503, Section 1, signed by Governor Inslee on April 17, 2019, and effective July 28, 2019 (Laws of 2019, Chapter 50).

4.3 Transportation (pp. 117-124)

We first provide some general comments below:

1. State, County, and local governments must commit to enforcement of existing Growth Management Act (GMA) provisions, especially Transportation Concurrency, or the State should make enforceable improvements to the GMA;
2. Lack of an effective enforcement mechanism makes this mostly moot as a planning tool. Plus, invalid Growth Targets create false assumptions;
3. Inaccurate (e.g., using unrealistic assumptions or conducting at too high a level) traffic analyses create false assumptions;
4. Lack of a mitigation plan that identifies major regional capacity and system improvements to go along with the decade of growth that is assumed and evaluated; and
5. Rural Area residents are not included on the PSRC boards (or are “represented” by County Councilmembers, who primarily live in urban areas), leading to under- representation in the planning process.

4.3.1 Analysis of Alternatives

4.3.1.1 Impacts Common to all Alternatives

On p. 119, there are four bullets under the sentence: “The following geographic trends are similar across all alternatives..., it is anticipated that by 2050:” The fourth bullet states:

“People who live in Cities & Towns and Rural regional geographies travel the longest distances, spend the most time in a car each day, and spend the most time per year in congestion. This is due to dispersed land development patterns in these areas, greater distances to major job centers, and reduced access to transit.

Yes, this is true, but more fundamentally, we believe it is due to weaknesses and “loopholes” (e.g., Level of Service Standards [LOSs] can be changed—“moving the goalposts”—and Highways of Statewide Significance [HSSs] are not subject to concurrency testing—we have spoken to State legislators who, inexplicably, did not know this was part of the HSS definition) in State Growth Management Act (GMA) Concurrency. We already have a tool that can be made to work, if it were improved and enforced. Further, we decry the practice of lowering LOS standards to artificially limit the apparent need for mitigation. We support the concept of expanding the transit system to provide people in low-density areas with an alternative to driving alone.

4.3.1.2 Comparison of Alternatives

The differences between the three alternatives is not all that great, but each are markedly better (especially the Table 4.3-2 [p. 120] “job accessibility” comparisons) than the “baseline” which represents

our recent (2014) current situation. Unfortunately, this shows that our current situation is quite intolerable.

4.3.3 Potential Mitigation Measures

In Table 4.3-3 (p. 123) we see no new potential mitigation measures that would have appreciable effects on the region's transportation infrastructure, nor its efficiency. More specifically, we provide the following comments on some of the 20 unnumbered bullets (which we numbered for clarity) below:

#4 – “Adopt and implement policies that reduce the impacts of growth.”

— We recommend vigorous enforcement of Transportation Concurrency, yet such mechanisms do not seem to be in place. More importantly, concurrency would be largely unnecessary as a tool, if funding were adequate for true mitigation of all impacts without diluting the LOS standards.

#13 – “Leverage data to improve understanding of system performance, resources, and program benefits.”

— We believe this needs further explanation, e.g., are there better data analysis tools to be explored? Are there better criteria?

#16 - “Encourage cooperation between transit agencies and shared mobility providers (e.g. Uber, Lyft, Car2Go, and ReachNow) to improve first- and last-mile connections and expand mobility.”

— We believe this means that, due to an incomplete route, people would have to call a ride to get them the last 6 blocks, or mile or two to their final destination. We see this strictly as an urban problem that would have little application in the Rural Areas unless there is a corresponding increase in transit service to and from the Rural Areas.

4.3.5 Significant Unavoidable Impacts

This presupposes that jurisdictions properly enforce Transportation Concurrency, which they do not. It also neglects to acknowledge the built-in loopholes in GMA Transportation Concurrency, such as allowing a jurisdiction to simply change its Level of Service standards (e.g., “move the goal posts”). Finally, as long as Highways of Statewide Significance (HSSs) are exempt from meeting Transportation Concurrency, it will be nearly impossible to solve problems arising from ever-increasing traffic volumes.

4.4 Air Quality (pp. 124-127)

Pollutant emissions are reduced with all alternatives. The principal observation is that each pollutant is reduced from the base year to any of the future alternatives, and there is little distinction to be found between the future alternatives per se.

Unfortunately, the contribution to greenhouse gases (GHGs) is not reduced very much compared to other pollutants. We support measures that more strongly mitigate the effects of climate change. For example, the State government is now debating a goal of zero GHG emissions from electric power generation within a shorter time horizon than 2050. Such a similar goal could be adopted for transportation emissions by 2050. The automobile marketplace is already transitioning to electric vehicles. A regional policy goal of zero fossil fuel consumption by 2050 seems quite achievable. That would, in turn, tend to support more compact, transit-oriented patterns of urban development and lessen the appeal of commuting between rural homes and urban jobs.

4.5 Ecosystems (pp. 127-133)

As with other topical areas, the Transit-Focused Growth alternative is preferred, because of its lessened impacts on ecosystems in the Rural Areas, urban unincorporated areas, natural resource lands, and critical areas.

4.6 Water Quality and Hydrology (pp. 133-138)

We recommend that the description of sea level rise with all alternatives more realistically recognize the science by changing: “may experience” to: “will experience” given the strong scientific consensus on climate change and, in fact, an alarming acceleration of concern about sea level rise in recent scientific publications (see any Scientific American for example). The news is not good. This, in turn, calls for a vigorous adjustment of regional plans to mitigate and reflection of true costs of adaptation to transfer development demand away from such areas.

4.7 Public Services & Utilities (pp. 138-141)

We concur with the summary statement that the Reset Urban Growth alternative: “has increased potential for the need to expand infrastructure and facilities into areas not currently served.” However, we would change: “has increased potential” to: “will increase.” It is far preferable to bolster the capacity of existing infrastructure in the Urban Growth Areas than to spread new infrastructure into Rural Areas. Currently, we have major concerns with the Cedar Hills Landfill as it reaches capacity. While the potential mitigation measures listed under Solid Waste in Table 4.7-1 (p. 141) are good, they could prove to be insufficient to handle the influx of so many more people and jobs into the region —with most going to King County, thus adversely impacting the landfill operations.

4.8 Parks & Recreation (pp. 142-146)

We concur with the finding that the Transit-Focused Growth alternative provides the most access to parks for urban residents. We also concur with the discussion applicable to all alternatives that regional growth inevitably leads to increased demand on both urban and rural parks and recreation facilities. We are especially concerned about the increased impact on Rural Areas of urban residents accessing wild open spaces and other recreational facilities situated in Rural Areas. This calls for more regional support for facility improvements in the Rural Areas, since that cost burden should not be placed on the rural residents. Another possible mitigation strategy is to expand park and recreation facilities within the Urban Growth Areas, so as to shorten travel distances to reach such facilities and keep more such travel within the urban area.

4.8.2 Cumulative Effects

We are concerned by the statement that: “population growth and associated development may limit available land for development of parks, open space, and recreational facilities, creating competition for available land and higher land costs.” To mitigate this adverse impact, we suggest the Urban Growth Areas place a first priority on setting aside sufficient land for new parks, et. al. before the development happens.

This could have huge benefits for the future quality of life, if the will can be found to make the right decisions in the present. In fact, while some low-density residential areas in core cities are potential targets for high-density redevelopment, we recommend an effort be made to set aside some such areas

to reclaim to lost open space in urban areas due to the lack of foresight by prior generations. For example, create new linear parks along urban streams to both provide recreational opportunity and restore some ecosystems at the same time that the surrounding low- density suburban areas become candidates for higher-density re-development.

4.8.3 Potential Mitigation Measures

The potential mitigation measures in Table 4.8-1. Potential Mitigation Measures: Parks and Recreation Resources (p. 145) allude to such strategies, but what is needed is firm direction with strong enforcement.

4.10 Energy (pp. 149-151)

While the differences between the alternatives are small, more importantly are the overarching concerns about climate change, which affect all alternatives.

4.11 Historic, Cultural, & Archeological Resources (pp. 151-152)

We strongly urge that outcomes from issues such as population increases and associated effects not be viewed as “unavoidable adverse impacts,” but addressed as concerns that can be effectively managed to preserve the Rural Areas’ many historic, cultural and archeological (HCA) resources.

We support the Mitigation Measures listed in Table 4.11-1. Potential Mitigation Measures: Historic, Cultural, and Archaeological Resources (p. 152) and reproduced below. However, we

believe they need to be strengthened, as well as equally and effectively enforced to avoid potential waiving of requirements.

- Use local planning and zoning techniques to identify and protect historic and cultural resources*
—This is necessary, but not sufficient due to undue growth pressures on the urban fringes near such HCA resources.
- Provide tax incentives to encourage preservation and rehabilitation of historic and cultural resources*
- Use fee simple acquisition or protective easements to control historic and cultural resources*
—This also should include seeking and identifying HCA resources that have been overlooked or neglected.

The region’s Urban Growth Area boundaries adjacent to the Rural Areas, Heritage Corridors, and Agricultural Production Districts should be considered inviolate. We request a thorough deliberation and regard for proximity and impacts to HCA resources in all planning and permitting processes and urge that all measures be taken to protect and preserve these irreplaceable resources that attract tourism and give our communities a vital sense of identity and pride.

4.12 Visual Quality (pp. 152-153)

We support the Transit-Focused Growth alternative with respect to lessened impacts on Rural Areas. We support the potential mitigation measures in Table 4.12-1. Potential Mitigation Measures: Visual Quality (p. 153). As elsewhere, we see the need for increased enforcement power through proper legislation.

4.14 Noise (pp. 154-155)

We support the Transit-Focused Growth alternative with respect to lessened impacts on Rural Areas. We support the potential mitigation measures in Table 4.14-1. Potential Mitigation Measures: Noise (p. 155). As elsewhere, we see the need for increased enforcement power through legislation.

5. Environmental Justice [<https://www.psrc.org/sites/default/files/v2050-dseis-chap5.pdf>] (pp. 157-178)

Certain populations are addressed here as meriting careful attention for impacts and appropriate mitigation—and we agree. Due to the adverse impacts of urban development on the Rural Areas, we believe “rural residents” should be considered as well. Such impacts are only alluded to and not fully described in the draft SEIS.

To rural residents this is an important issue. The siting of urban urban-serving facilities in the Rural Area because the land is cheaper flies in the face of all State policies, as well as both regional, and county plans. Urban dwellers increasingly use rural recreational features as if they were city parks, clogging access roads and intruding upon rural neighborhoods.

Urban dwellers increasingly use rural roads for commuter routes as bypass alternatives to severely overloaded urban arterial corridors. No urban neighborhood would tolerate such “cut-through” traffic and major cities have extensive programs of traffic management to deter such behaviors. Yet city-to-city traffic cuts through the Rural Areas every day, seeking a way around the congested urban corridors. Unfortunately, these facts go unnoticed and unmitigated by the various planning processes in place that allow such deviations to occur without mitigation, and then proclaim that the forecast travel demand on the major arterial corridor has been adequately planned. Rural Areas will be increasingly threatened until such effects are recognized and mitigated as a matter of justice.

6. Multicounty Planning Policies [<https://www.psrc.org/sites/default/files/v2050-dseis-chap6.pdf>] (pp. 179-181)

6.2 Multicounty Planning Policies and Potential Updates

We reserve comments until proposed changes are publicly released, as stated below (p. 180):

“For each topic area, Chapter 7 of the VISION 2040 FEIS summarizes the multicounty planning policies and describes their purpose and environmental effects. Input to date indicates that VISION 2040’s policies provide a strong foundation and should be largely retained, with select updates for emerging policy areas and changing conditions. Some changes are also proposed to strengthen or clarify policies. The multicounty planning policies will be revised to be consistent with the preferred Regional Growth Strategy alternative selected by the Growth Management Policy Board and will be included with the draft plan when it is released in summer 2019.”

As Multicounty Planning Policies provide “a common, coordinated policy framework,” we request the Public be given sufficient time to review and comment on same and how they support the Regional Growth Strategy.

APPENDICES

B — Supplemental Data Tables and Figures

[<https://www.psrc.org/sites/default/files/v2050-dseis-appendixb-suppdatables.pdf>]

Issaquah is a designated regional growth center. This designation tends to increase trends for traffic growth between Issaquah and areas to the south, both rural and incorporated cities. But PSRC's Regional Transportation Plan (RTP) lacks any improvements to transportation capacity in that north-south corridor to serve such travel. The existing transportation infrastructure is overburdened as a result. Rural Area residents are made to pay the price for urban growth.

Finally, King County has insufficient roads "maintenance" budget to accommodate all the urban pass-through commuter traffic on such "county" roads.

Average Annual Vehicle Delay Hours per resident increases with all three alternatives. This is apparently related to the absence of sufficient mitigation measures. In percentage terms, Rural Area residents are the most adversely affected. This relates to the absence of capacity improvements in the urban commuter corridors, whether road capacity or transit capacity.

Transit boardings are, of course, highest with the Transit-Focused Growth alternative, that the difference from the Stay the Course alternative is only 5%, hardly a dramatic shift. This emphasis, within the urban areas, apparently links to the lessened growth pressure on rural areas. However, this must be assured. The methodology indicates that planners simply assume less growth in Rural Areas, not that the Transit-Focused Growth alternative actually will be effective in achieving that goal. Policies and laws to assure such trends should be identified. Top candidates include firm enforcement of Growth Targets for all areas, and enhanced transit service linking the Rural Areas with urban jobs.

The share of commute trips by mode indicates a dramatic shift toward walking and bicycling to work by 2050. The Single-Occupant-Vehicle (SOV) share drops markedly as a result. Still, given a near 50% population increase between 2014 and 2050, total trips on the road still increase around 25%-30%. More cars on the same roads directly explains why the average delay per person increases over that time period as well. There must be offsetting mitigation improvements to reduce delay. As adding road capacity is deemed undesirable—something with which we agree, then the transit system should be expanded sufficiently to divert the growth in riders to transit. Lacking that emphasis, the regional plan is not a balanced plan.

The table of travel times by major corridors lacks comparable measures for a base year, making it difficult to ascertain how much difference each alternative actually makes. And the growth in travel times would be correlated to the average delay measures.

The table of Impervious Surfaces should reformatted for consistency with most other tables. It stands alone as listing the incremental change from the base year, whereas most other tables give actual measures for the base year and the year 2050. Alternatively, the wording in the title should be changed to more clearly emphasize this distinction.

The table addressing population in proximity to parks underestimates the impact of urban growth on the Rural Areas. The increasing urban population, coupled with a fixed amount of natural environment, implies a rather large impact of additional traffic, parking, and related services for all recreational/park sites in the Rural Areas. This should be discussed. For example, there are growing congestion and safety problems on Issaquah Hobart Road at the hang-glider field, due to an exploding number of hikers coming from urban areas to use the hang-glider trail up to Poo Poo Point. As a result, the parking area is often full and unavailable to the hang glider community, in

addition to the traffic issues. This is a fairly recent development, and thus a good example of a growth-driven problem.

C — Modeling Methodology and Analysis Tools

<https://www.psrc.org/sites/default/files/v2050-dseis-appendixc-modelingmethodology.pdf>

The data and charts in Figures C.2-2 and -3 demonstrate that the regional plans for growth direction have failed to deliver on their promises. Less growth is happening in urban areas, and more growth is happening in rural areas, than plans provided for from 2000 to 2017. This is actually a long-standing pattern evident in trends since the 1970's when urban sprawl was first defined as a negative. Urban planners envision concentrated growth in the core areas of the region — and Rural Area residents would be quite happy for urban growth to follow those visions

— but the development marketplace persists in a less concentrated direction, primarily to accommodate urban workers seeking lower cost housing at a distance from their jobs. Clearly, stronger mitigation requirements are needed to succeed in achieving the planners' vision. Those requirements, most likely, must be made as changes to State law, since local governments have shown, since 1990, that they are ill-equipped to actually manage growth properly.

The methodology description surrounding Table C.2-9 indicates PSRC made many technical assumptions to implement the outline of each alternative. For example:

“To model the Stay the Course alternative, PSRC developed jurisdiction-level growth assumptions based on VISION 2040 regional geographies.”

And after Figure C.2-4 it states:

“Selected manual adjustments were made to the employment growth allocations to better reflect the intended policy goals of the Transit Focused Growth alternative. And in one last step, the 5 percentage point jobs shift across counties was implemented, which shifts more future job growth to Kitsap, Pierce, and Snohomish counties from King County.”

These statements show that staff considered the total growth potential in each jurisdiction in each regional geography, and then assumed a certain distribution for each jurisdiction. While such assumptions are understandably necessary, there is no presentation of data to show the range of possible assumptions that might have been made, or by what means was the region-wide distribution of growth made to treat each jurisdiction consistently and fairly? Some information to explain this range of possibilities would be most helpful.

In section C.2-4 the text (see p. C-20) seems to acknowledge the weakness of these assumptions by stating:

“The difference [in growth] can be pronounced for certain regional geographies.”

In section C.2-5 the discussion of modeling in UrbanSim identifies a most disturbing assumption: the use of county-wide growth targets as a control (see p. C-23).

“In this approach, growth targets serve as a proxy for shared understanding between local jurisdictions as to the relative role each plays in accommodating their respective county's future growth.”

Unfortunately, this means that when a jurisdiction such as the City of Black Diamond intends to develop to a much, much higher level than the growth target assigned to it by the regional planning processes, that intention is not captured in the modeling process at all. Thus, even though the Reset Urban Growth alternative aims to reflect a continuation of actual development trends, it still does not take into account the actual intentions of Black Diamond. It still limits the Black Diamond

jurisdictional forecast to the region's growth target, which is far, far less than Black Diamond's plans. As a result, the impacts of Black Diamond's plans are never accounted for in any forecasting and analysis of traffic or other impacts on regional and local facilities.

We have witnessed in the past year alone that intensive analysis of traffic issues in and around the City of Issaquah on I-90, SR-18, and Issaquah-Hobart Road were described as using the latest regional forecasts. The authors of those studies appeared to be unaware that the regional forecasts they relied on failed to consider the largest impending source of new traffic in the study area. They were led astray precisely by this policy approach of relying on countywide totals and regionally endorsed distributions, when the City of Black Diamond shows no intention whatsoever to adhere to that distribution. As things now stand, the eventual result will be that the City of Issaquah is inundated by traffic increases to/from the south that seem to "come from nowhere" because the "official" regional forecasts fail to "connect the dots" properly. This is rapidly becoming the current case even before the massive Black Diamond developments are built and occupied!

D — Evaluation Criteria for Selecting a Preferred Growth Alternative

[<https://www.psrc.org/sites/default/files/v2050-dseis-appendixd-evaluationcriteria.pdf>]

VISION 2050 Outcomes

We support all thirteen (13) outcomes listed, especially the last one: "Rural Areas. Rural communities and character are strengthened, enhanced, and sustained."

Evaluation Criteria

Development Patterns (p. D-3)

We do not understand why one of the evaluation criteria includes: "Growth in proximity to the urban growth boundary (population and employment within one-quarter mile of both sides of the urban growth boundary)" This implies that it is desirable to develop on the rural side of the Urban Growth Boundary in violation of the State's Growth Management Act. We adamantly disagree with this premise.

F — List of Preparers

<https://www.psrc.org/sites/default/files/v2050-dseis-appendixf-preparers.pdf>

We are surprised to see no Climate specialists on the Preparers' List.

G — Distribution List

<https://www.psrc.org/sites/default/files/v2050-dseis-appendixg-distributionlist.pdf>

Thank you for including the GMVUAC on the Distribution List. In the future, please include all our organizations as listed on our Cover Letter herein.

H — Equity Analysis

[<https://www.psrc.org/sites/default/files/v2050-dseis-appendixh-equityanalysis.pdf>]

Environmental Justice (see p. H-3) is described as: "equal protection...regardless of race, ethnicity, or economic status. ... no population of people should be forced to shoulder a disproportionate share of ...

impacts...due to a lack of political or economic strength. ... Environmental justice promotes equal access to the decision-making process to have a healthy environment in which to live, learn, and work.” The text lists over 22 specific populations that may be considered. We support these principles.

We believe these principles apply to Rural Area residents as well, because the fundamental criteria for justice apply to them as well. As described several times in our comments herein, the interests of Rural Area residents are so often systematically omitted from regional planning. Rural Area residents find themselves bearing adverse impacts of urban growth without recognition by the region that those impacts occur. Rural voices are little provided for in the governmental structures, and at the regional level, not at all. In King County alone, the rural population is nearly equivalent in size to that of the its second largest city—Bellevue. Yet, Rural Area residents are afforded less representation than most cities. Clearly, this is not just.

[Commenter\(s\):](#)

Greater Maple Valley Unincorporated Area Council, Enumclaw Plateau Community Association, Green Valley / Lake Holm Association, Hollywood Hill Association, Upper Bear Creek UAC, Mike Birdsall, Steve Hiester, Nancy Merrill, Peter Rimbos, Nancy Stafford, Michael Tanks

[Pierce Transit](#)

[Communication ID: 354791](#)

[04/29/2019](#)

April 29, 2019

Attention: Vision 2050 Draft SEIS Comment

Puget Sound Regional Council

1011 Western Avenue Suite 500 Seattle, WA 98104

Subject: Vision 2050 Draft SEIS Comments and Preferred Alternative

To whom it may concern:

Pierce Transit is pleased to provide comments on the Draft Supplemental Environmental Impact Statement (DEIS) for the upcoming Vision 2050 Long Range Plan.

After careful review of the document, while focusing on the various sections most relevant to transportation and transit, we would like to share the following comments or questions. References to specific language or tables found in the Vision 2050 document are cited in parentheses.

If the Transit Focused Alternative were adopted, would Pierce County show an increase (from the current 20 percent, as in Snohomish County) of employment within high capacity transit areas? (Sec. 2.4.3 TOD, p. 30)

Pierce Transit's long-term strategy is to create a network of four BRT routes that interconnect to both fixed routes and regional transit. This would, in turn, raise the percentages of population and employment in proximity to HCT well above the 14 percent shown in Table 2.4.2. (Sec. 2.4.3 TOD, p. 31)

Even under the Transit Focused Growth alternative, we note that the 2050 Population and Employment projections for both Rural and Urban Unincorporated areas of Pierce County are higher than what is projected for the region as a whole. And we agree with those assumptions. (Sec. 3.3, Fig. 3.3-1, p. 89)

We observed that population growth in the three scenarios only vary by 14 percent when you combine Metropolitan Cities, Core Cities, and HCT Communities. As expected, the Transit Focused Growth alternative is the highest at 88 percent. In tandem, Cities & Towns, Urban Unincorporated, and Rural combine for the other 12 percent. By comparison, that combined total is 19 percent in the Stay the Course alternative.

We also find it interesting that employment projections by subarea type are almost identical in both the Transit Focused Growth and Stay the Course alternatives. As such, with 92 percent of employment focused on urban areas in both alternatives, it makes perfect sense for transit agencies to plan to ramp up services to meet the growing demand in those cities and communities as well. (Sec. 3.5 Alternatives Comparison, Table 3.5-1, p. 92)

We find it interesting that the SoundCast travel model proves that "Overall transit ridership is forecast to more than double," regardless of which alternative is ultimately advanced. However, does the model still show the longest commute times and distances for Pierce County residents in Horizon Year 2050, even under the Transit Focused Growth alternative? If so, we'd suggest explaining why this isn't subject to change over the long term, even with the Tacoma Dome Link Extension, Sounder extension to DuPont, and Pierce Transit's BRT network completed and in operation by then. (Sec. 4.3.1.1 Impacts Common to AU Alternatives, pp. 118-119)

More data that strongly support the Transit Focused Growth alternative, especially for Pierce County, are provided in this Table 4.3-2 (p.120). It is of interest to note that this alternative would rectify the huge imbalance between Pierce and King Counties under the "transit-accessible jobs" metric. By example, today's Baseline shows almost 9.6 times as many jobs accessible via transit in King County than in Pierce County. That ratio is reduced to 4.8 times higher in 2050; essentially cut in half under the Transit Focused Growth alternative. With the jobs-housing balance seriously lacking in three of the four counties within the region today, this alternative demonstrates the most effective method for correcting the imbalance not only for Pierce County, but for Kitsap and Snohomish Counties as well. This comparison and narrative are presented further at the beginning of Table 5.5-1 on page 173.

We feel this deserves a more detailed explanation as to why this alternative only models a slight decrease in emissions when compared to Stay the Course. Most readers would assume the Transit Focused Growth alternative's modeling results would show substantially reduced greenhouse gas (GHG) emissions, especially when reviewed against the data and analysis mentioned in Table 4.3-2 on page 120 above. (Sec. 4.4.1.4 Impacts of the Transit Focused growth Alternative, p. 125)

The Current Demographics section (5.4.2, pp. 163-168)) clearly and succinctly shows the makeup and locations of various minority and low-income populations who are often transit dependent. Pierce Transit appreciates seeing the US Census' American Community Survey data provided by race,

Hispanic/Latina origin, and below poverty thresholds by county. It would be of further interest to our agency to see Figures 5.4-1 and 5.4-2 (pp.166-167) with the future HCT network overlay (i.e., the regionally connected system to be built out by 2050), in order determine if the planned, highest cost transit expansion projects will directly serve those with potentially the greatest need. This comparison and narrative are presented further in Table 5.5-1 on page 174.

Another argument for the Transit Focused Growth alternative is cited in the Transportation Equity section (5.4.5). Transit investments benefit people of color and those with low incomes to a greater extent than to the region as a whole. We therefore owe it to these communities to provide equitable, fast, safe, frequent, and reliable transportation options to those citizens who continue to demonstrate the greatest demand for local or regionally-connected transit. This comparison and narrative are presented further in Table 5.5-1 on page 173.

Pierce Transit commends the PSRC for recognizing a growing concern for communities of color and lowincome populations. And that is the national reality that as older and well-established urban neighborhoods gentrify or are rezoned to accommodate higher densities and mixed used development, albeit marketed as "transit-oriented," residents with long established histories can be priced or forced out of their homes. Not only recognizing displacement risk, but clearly offering alternatives (beyond "No build; Do not redevelop or rezone") or actions cities and counties can take to assure continuity and affordability to its most vulnerable residents is supplemental information that should be provided as part of this document as well. (Table, 5.5-1, p.175)

After carefully reviewing the draft SEIS and weighing the three proposed growth alternatives against each other,

Pierce Transit staff feels that the Transit Focused Growth alternative most closely aligns with our agency's future vision for the region. In addition, it seems the most viable alternative for managing growth in a major metropolitan area where the Puget Sound Regional Council's own predictions for population, jobs, and commute travel times have continuously proven to be much too conservative. No matter how much growth we collectively plan for, it is a safe assumption that it will happen much sooner than we can predict. Vision 2050 offers us a realistic and viable alternative.

In closing, thank you for your consideration of these comments and our recommended growth alternative as you begin to develop the draft Vision 2050 document for release in June 2019.

Sincerely,

Ryan Wheaton, Executive Director - Planning & Community Development

CC: Tina Lee, Planning Manager - Pierce Transit

[Commenter\(s\):](#)

Pierce Transit, Ryan Wheaton

[Pierce Transit \(staff comment\)](#)

Communication ID: 354817

04/29/2019

Paul – I also shared the attached with Liz in person on Wednesday and thought you may want to review a copy too.

Please note that they do not necessarily reflect the opinions of Pierce Transit’s management.

Instead, any suggested corrections or revisions to the Vision 2050 Draft SEIS in this matrix that were not specifically listed in the formal comment letter I just sent too are mine alone.

I hope you still find them helpful!

Darin L. Stavish, AICP

Principal Planner

Suggested Edits/Revisions

| Page | Section/Figure/Table | Comments and Suggested Revisions |

| --- | --- | --- |

| ES-9 | Transit Focused Growth Alternative | The planning literature consistently cite a half-mile radius walkshed for access to HCT systems or stations. A quarter-mile radius is cited for local, fixed route bus stops only. That is, we’ve always understood that transit patrons will generally walk up to a half-mile (or more) to access any high capacity transit system or mode, such as light rail, commuter/regional rail, bus rapid transit, and ferries. |

| 30 | 2.4.3 TOD | Same comment as above. Suggest BRT walksheds or catchment areas be increased to one-half mile. |

| ES-10 | Comparison of Alternatives Table ES-1 | Some of the six cells with percentages don’t add up to 100% (See Stay the Course – Where would employment go? which sum to 101%). Perhaps add a footnote to the table?: Percentages may not add to 100, due to rounding. |

| 30 | 2.4.3 TOD | If the Transit Focused Alternative were adopted, would Pierce County show an increase (from the current 20 percent, as in Snohomish County) of employment within high capacity transit areas? |

| 31 | 2.4.3 TOD | PT’s short- and long-term strategy is to create a network of four BRT routes that interconnect to both fixed routes and regional transit. This would, in turn, raise the percentages of population and employment in proximity to HCT well above the 14% shown in Table 2.4.2. |

| 32 | 2.5.1 Transportation System Capacity Improvements | Under Transit heading: Change “....have updated their development plans to meet the needs...” to “Long Range Plans.” The Transit Development Plans are an annual requirement for WSDOT that only show six-year budgets and short-term projects forecasting. |

| 89 | 3.3 Transit Focused Growth Alternative | Figure 3.3-1: Even under this alternative, we note that the 2050 Population and Employment projections for both Rural and Urban Unincorporated areas of

Pierce County are higher than what is projected for the region as a whole. And we agree with those assumptions. |

| 92 | 3.5 Alternatives Comparison | Table 3.5-1: We observed that population growth in the three scenarios only vary by 14 percent when you combine Metropolitan Cities, Core Cities, and HCT Communities. As expected, the Transit Focused Growth alternative is the highest at 88 percent. In tandem, Cities & Towns, Urban Unincorporated, and Rural combine for the other 12 percent. By comparison, that combined total is 19 percent in the Stay the Course alternative. We also find it interesting that employment projections by subarea type are almost identical in both the Transit Focused Growth and Stay the Course alternatives. As such, with 92 percent of employment focused on urban areas in both alternatives, it makes perfect sense for transit agencies to plan to ramp up services to meet the growing demand in those cities and communities as well. |

| 94-96 | Figures 3.5-2 to 3.5-4 | The Population Distribution dot density maps by alternative are too small and hard to read. We'd suggest zooming in by county or only showing one county per page/map. Either that or, at a minimum, enlarge all three to 11" x 17" portrait pages and add them to the appendices. |

| 118 | 4.3.1.1 Impacts Common to all Alternatives | We find it interesting that the SoundCast travel model proves that "Overall transit ridership is forecast to more than double," regardless of which alternative is ultimately advanced. However... |

| 119 | 4.3.1.1 Impacts Common to All Alternatives | ...does the model still show the longest commute times and distances for Pierce County residents in Horizon Year 2050, even under the Transit Focused Growth Alternative? If so, we'd suggest explaining why this isn't subject to change over the long term, even with the Tacoma Dome Link Extension, Sounder extension to DuPont, and Pierce Transit's BRT network completed and in operation by then. |

| 120 | Table 4.3-1 | We'd suggest it would help to include greenhouse gas emission levels for the 2014 Baseline plus the three 2050 growth alternatives in this table. Since climate change is a rapidly growing concern in the region and is emphasized in Vision 2050, if not here, we'd still suggest providing a comparison of forecast or estimated GHG emission levels by alternative somewhere in the document, if you haven't already. Perhaps note that It is provided later in the document in Table 4.4-1 on page 125? |

| 120 | Table 4.3-2 | More data that strongly support the Transit Focused Growth Alternative, especially for Pierce County, are provided in this table. It is of interest to note that this alternative would rectify the huge imbalance between Pierce and King Counties under the "transit-accessible jobs" metric. By example, today's Baseline shows almost 9.6 times as many jobs accessible via transit in King County than in Pierce County. That ratio is reduced to 4.8 times higher in 2050; essentially cut in half under the Transit Focused Alternative. With the jobs-housing balance seriously out of balance in three of the four counties within the region today, this alternative demonstrates the most effective method for correcting the imbalance not only for Pierce County, but for Kitsap and Snohomish Counties as well. This comparison and narrative are presented further at the beginning of Table 5.5-1 on page 173. |

| 123 | Table 4.3.3 | Tenth bullet on the list: ORCA is an acronym so should be all capital letters. You have it spelled "Orca." You might also suggest analyzing and potentially converting current signalized intersections to roundabouts, especially on Washington State Highways or Routes. See WSDOT Design

| 125 | Table 4.4-1 | Suggest converting (dividing) the Base Year (annual) data to Tons per Day too for a more accurate, side-by-side comparison of current conditions to the three growth alternatives. |

| 125 | 4.4.1.2 Comparison of Alternatives | Correct “Supporting data is shown...” to are shown; data is the plural form of datum. (You have it used correctly on page 165, third paragraph, second sentence: “these data.”) |

| 125 | 4.4.1.4 Impacts of the Transit Focused Growth Alternative | We feel this deserves a more detailed explanation as to why this alternative only models a slight decrease in emissions when compared to Stay the Course. Most readers would assume the Transit Focused Growth alternative’s modeling results would show substantially reduced GHG emissions, especially when reviewed against the data and analysis mentioned in Table 4.3-2 on page 120 above. |

| 127 | Table 4.4-2 Topic: Localized Emissions | Suggest fleshing out last bullet to read: · Implement and enforce “No Idling!” policies at transit centers or stations, ferry terminals, airports, CBDs, and other places where people routinely wait in their vehicles for extended periods of time. The Puget Sound Clean Air Agency calls positive, personal actions to curtail air pollution like these “low hanging fruit.” |

| 163-168 | 5.4.2 Current Demographics | This section clearly and succinctly shows the makeup and locations of various minority and low-income populations who are often transit dependent. Pierce Transit appreciates seeing the ACS data provided by race, Hispanic/Latino origin, and below poverty thresholds by county. It would be of further interest to our agency to see Figures 5.4-1 and 5.4-2 (pp. 166-167) with the future HCT network overlay (i.e., the regionally connected system to be built out by 2050), in order determine if the planned, highest cost transit expansion projects will directly serve those with potentially the greatest need. This comparison and narrative are presented further in Table 5.5-1 on page 174. |

| 169-170 | 5.4-3 Equity Geographies 5.4.4. Displacement Risk and Growth Pressure | Same mapping suggestion as above for Figures 5.4-3 and 5.4-4. |

| 172 | 5.4.5 Transportation Equity | Another argument for the Transit Focused Growth alternative is cited in this section. Transit investments benefit people of color and those with low incomes to a greater extent than to the region as a whole. We therefore owe it to these communities to provide equitable, fast, safe, frequent, and reliable transit services to those citizens who continue to demonstrate the greatest demand for local or regionally-connected transit. This comparison and narrative are presented further in Table 5.5-1 on page 173. |

| 175 | Table 5.5-1 | Pierce Transit commends the PSRC for recognizing a growing concern for communities of color and low-income populations. And that is the national reality that as older and well-established urban neighborhoods gentrify or are rezoned to accommodate higher densities and mixed used development, albeit marketed as “transit-oriented,” residents with long established histories can be priced or forced out of their homes. Not only recognizing displacement risk, but clearly offering alternatives (beyond “No build; Do not redevelop or rezone”) or actions cities and counties can take to assure continuity and affordability to its most vulnerable residents is supplemental information that should be provided as part of this document as well. |

Commenter(s):

Pierce Transit, Darin Stavish

Port of Seattle, Port of Tacoma, Port of Bremerton, Port of Everett

Communication ID: 354663

04/29/2019

April 26, 2019

The Honorable Ryan Mello Chair, Growth Management Policy Board (GMPB) Puget Sound Regional Council 1011 Western Ave., Ste. 500 Seattle, WA 98104

VIA EMAIL: VISION2050SEIS@PSRC.ORG

Re: Comments on Draft Supplemental Environmental Impact Statement for Vision 2050 Plan

Dear Chair Mello,

Thank you for the opportunity to provide comments on the Draft Supplemental Environmental Impact Statement (SEIS) for Vision 2050. This letter and the attached detailed comments represent the collective perspective of the ports of Bremerton, Everett, Seattle and Tacoma along with The Northwest Seaport Alliance. Our programs touch the lives of Puget Sound residents in numerous ways, ranging from economic engines such as the state's largest cargo terminals to quality of life through our travel and recreation facilities.

Our mission is to create good jobs across the state by advancing trade and commerce, promoting manufacturing and maritime growth, and stimulating economic development. The Growth Management Act recognized the importance of our facilities by designating them as essential public facilities, both the maritime ports and Sea-Tac International Airport. Our ports and The Northwest Seaport Alliance are assets of statewide significance, serving as national and international gateways for travelers, trade and tourism. These facilities have developed over decades, with unique interactions among existing land uses and critical transportation infrastructure. These gateways cannot be replicated elsewhere and provide a crucial function in the resiliency of our state's economy.

A central issue in the SEIS alternatives analysis is how to achieve a better jobs-housing balance in each of the communities across the region. We share in this goal and we recognize its numerous benefits. Of course achieving a jobs-housing balance is a complex task involving matters such as diversified industries, wage profiles, and housing costs.

For this reason we highlight the importance of the region's industrial lands and the family-wage jobs they sustain. The 2019 Port of Seattle, Port of Tacoma, and The Northwest Seaport Alliance Economic Impact Analysis found that jobs in the marine cargo business have an average annual pay of \$99,662. Switching to a statewide view, the 2017 Washington State Maritime Sector Economic Impact Study found that that maritime industries support 191,000 jobs in the state when upstream support chain transactions (indirect effects) as well as maritime-related income expenditures (induced effects) are included. The discussion of industrial lands in the PSRC Centers Framework project attracted a great deal

of attention from cities across the region. This is a testament to industrial centers' status as assets to the regional economy and the need for continued protection.

Unfortunately the planning needs of industrial centers seemed to be repeatedly forgotten in recent discussions about Vision 2050 policy development at PSRC's Growth Management Policy Board. Housing issues have been a focus – as they should be – but the Board's zeal to address housing has led to us to repeatedly point out consequences for Manufacturing / Industrial Centers (MIC's). Typical cases involve policies that would prescribe housing at all high capacity transit station areas or at brownfield sites. Both are inappropriate when the areas are located within MIC's.

We invite you to review the attached detailed comments and look forward to working with you, the GMPB and additional stakeholders on Vision 2050.

Sincerely,

Commissioner Peter Steinbrueck

Port of Seattle Commissioner and Northwest Seaport Alliance Managing Member GMPB Ports Representative

Attached: Detailed Comments on Vision 2050 Draft SEIS Vision 2050 SEPA scoping letter, March 19, 2018

Detailed Comments: Vision 2050 Draft SEIS

The ports of Bremerton, Everett, Seattle and Tacoma, along with the Northwest Seaport Alliance, are pleased to submit these detailed comments on the Vision 2050 Draft SEIS.

Purpose and Need, Section 1.2 The current purpose and need statements do not address some of our biggest concerns: incompatible land uses near our facilities in the MICs, and the need to maintain and improve freight mobility, so that our economy can continue to grow. We request the following change in the objectives for the Regional Growth Strategy identified by the Growth Management Policy Board:

- Build transit-oriented development around planned infrastructure consistent with underlying land use designations.

The Growth Management Policy Board also identified desired outcomes for VISION 2050. Please revise the Mobility and Connectivity outcome to include freight:

- Mobility and Connectivity. A safe, clean, integrated, affordable, and highly efficient multimodal transportation system reduces travel times, promotes economic and environmental vitality, efficiently moves freight, connects people, and supports the Regional Growth Strategy.

**** Affected Environment / Regulatory Environment, Section 2**** The description of changes in affected environment does not include reference legislation that is important to the Ports, and Vision 2050 sure thrive to ensure that its goals are met. In 2009 the Washington State legislature added RCW 36.70A.085, finding that Washington's marine container ports operate within a complex system of marine terminal operations, truck and train transportation corridors, and industrial services that together support a critical amount of our state and national economy, including key parts of our state's manufacturing and agricultural sectors, and directly create thousands of high-wage jobs throughout our region. It is also concerned about other, larger ports in Washington, including the Port of Everett and Bremerton.

The legislature further found that the container port services are increasingly challenged by the conversion of industrial properties to nonindustrial uses, leading to competing and incompatible uses that can hinder port operations, restrict efficient movement of freight, and limit the opportunity for improvements to existing port-related facilities. In explaining the need for RCW 36.70A.085, the legislature wrote:

“It is the intent of the legislature to ensure that local land use decisions are made in consideration of the long-term and widespread economic contribution of our international container ports and related industrial lands and transportation systems, and to ensure that container ports continue to function effectively alongside vibrant city waterfronts.”

Please revise Table 2.17-1 to include these, for the Ports, critical change to the GMA, and ensure that its intent is supported in the alternatives, policies, and mitigation measures.

Land Use—Description of Transit-Oriented Development, Section 2.4.3 This section needs to include a description of what is meant by transit-oriented development (TOD), and a recognition of underlying land use designations that may mean TOD looks different at each High Capacity Transit location. This is especially true for MICs, where housing is expressly prohibited.

Regional Geographies, Section 3.1.2 We have followed the process leading to the recognition of Major Military Installations with interest, and are applauding their inclusion in the Regional Geographies. Ports and airports have similar challenges. Recognition of the four Ports and Major Airports, similar to Major Military Installations would be appropriate.

The planning challenges faced by military bases are very familiar to ports. We are concerned that are not adequately addressed by existing RGA plans and policies, as expressed in our scoping letter for Vision 2050. From our perspective, there is a lack of recognition of the need to protect these economic development assets. Current draft policies, and the mitigation measures proposed in the DSEIS, do not sufficiently protect our ability to function.

The Department of Commerce just released a draft guidebook on military land use compatibility¹ to help cities plan in accordance with the Washington State Growth Management Act (GMA). Its content is intended to address challenges and opportunities related to balancing the military’s need to operate safely and community interests within a shared landscape. A similar effort geared towards ports in Puget Sound is needed.

Evaluation Criteria, Appendices C and D

Baseline Assumptions and Methodology Appendix C, outlining the Modeling Methodology and Analysis Tools, shows that each model used to determine the outcome of the alternatives is based on assumptions that may, or may not, reflect reality. Models do what the name implies: They attempt to model future outcomes and can only provide an approximation of those future outcomes. The data provided in Table ES-3 indicate that for many criteria, the difference in outcomes across alternatives would appear well below the margin of error. We understand that it is difficult to get more precise data, and models that support more realistic forecasts. Maybe a scenario analysis approach would help the region better understand the range possible outcomes?

Selected Criteria In reviewing Table ES-3, which is intended to summarize the performance of the different alternatives, we are struck by the fact that appears to treat each criterion with the same weight. Yet, some criteria clearly do not reflect a high priority for the region. An example is the “Visual Quality” criterion, which infers that any type of multi-family housing is always preferable to single family housing in more rural areas. From our perspective, this is a highly subjective assessment. The very same table also acknowledges that increases in high-density housing also increase the risk of displacement. Which

1 <https://deptofcommerce.app.box.com/s/ccvku9omtaj20le4zzkum4fesvh0mv49>

criterion is more important? Please work with the member jurisdictions to determine priorities before work on the EIS begins. That may also help focus limited staff and modeling resources on the most critical issues that must be addressed. It would also be helpful if future documentation could include the rationale for seemingly subjective evaluation such as the above.

We understand the difficulty in generating data that can measure progress toward the desired outcomes of Vision 2050. By necessity, many of the criteria used to evaluate progress towards the desired outcomes are very high level, and use proxies. However, we are deeply concerned that some of the criteria used have, at best, a tenuous causal relationship with the desired outcomes. At the same time, criteria that would address some of our own goals and concerns are missing:

Development Patterns/Land Use The analysis is based four criteria:

- Growth in proximity to the urban growth boundary
- Growth in proximity to high capacity transit station areas
- Developed land (acres)
- Land use (Overall judgment from DSEIS land use analysis)

It is difficult for us to understand how the three quantitative criteria can provide a basis for deciding which growth alternative best serves the region’s land use goals for the next 30 years. We agree that it is essential to avoid excessive growth to rural and resource lands, and that location-specific, appropriate growth should be focused in proximity to high capacity transit stations. From the ports’ perspective, there are other important questions that require answers. We hope that the EIS will include analysis that provides answers to the following questions:

- To what extent do the alternatives increase pressure on existing, older MICs like the Duwamish MIC, or the Port of Tacoma MIC, which are served by existing and/or future high capacity transit?
- Do they support the growth of newer MICs, and those in the making, like Arlington/Marysville?
- Do they support not only balanced jobs/housing growth, but also provide the right type of job in the right type of place? (This is also an important question related the alternatives’ respective support of the regional economy.)
- Reading the DSEIS and its various appendices, it is difficult to discern what the generic land use criterion (based on overall judgment) means, and this criterion is not included in Table ES-3. In the EIS document, please be explicit about the performance indicators you are using for this criterion.

Economy As ports we are charged with generating economic and job growth for the counties we serve. We take our responsibility seriously. For this reason, we are particularly disconcerted by the criteria used to determine the impact of each alternative on the economy of our region:

- Access to jobs by non-SOV mode This criterion illustrates the limitations of the Geographies on which the analysis is based. Not all land uses are equal. Our cargo terminals are by definition land-intensive, making access by transit expensive, if not impossible. This is true for to varying degrees for other industrial manufacturing land uses, including rail yards and warehousing distribution centers. Yet, they, and the often synergistic businesses located in the surrounding MICs, are major economic engines for the region.

We are dismayed that there is not a concurrent criterion reflecting the impact of each alternative on freight access to the MICs and other freight dependent land uses. Delay, the only somewhat freight-related transportation criterion, only partially reflects the economic impact of the proposed alternatives on the economy of the region.

- Jobs-housing balance/ratio indexed to regional average The current housing crisis in our region clearly illustrates the fact that this criterion fails to address one critical element: There is a growing imbalance in between the type and cost of housing and the types and salaries of jobs that would be created. Seattle and other cities in the region have recognized this fact and instituted minimum wage ordinances. By itself, the housing/jobs ratio is not a good indicator of the health and growth of our economy. Please consider including analysis that can answer this simple question: Are we growing the right jobs in the right places?

The ports have pointed out on many occasions that housing is incompatible with heavy industrial land uses in the MICs, and should be avoided when brownfields are developed. Yet, the one-size-fits-all analysis approach used in the DSEIS does not account for this reality. We would be happy to help you determine whether there is a way to reflect that reality in the EIS evaluation of the alternatives. There is an urgent need to ensure that development in or near the MICs is compatible with heavy industrial uses.

- Economy (overall judgment from DSEIS population, employment, and housing analysis) Reading the DSEIS and its various appendices, it is difficult to discern what this criterion is measuring. It is not included in Table ES-3. In the EIS document, please be explicit about the performance indicators you are using for this criterion. An important question that should be answered by the EIS is:

How do the alternatives support the industry clusters, including the Maritime Industrial Sector, that are at the core of our Regional Economic Strategy?

Transportation The DSEIS includes the following criteria to evaluate the transportation impacts of the alternatives:

- Vehicle miles travelled (per resident) • Vehicle minutes travelled (per resident) • Delay (average hours per resident) • Transit ridership • Mode share (focused on people)

Here, our earlier statement that, for some criteria, the difference in outcomes across alternatives would appear well below the margin of error, is particularly relevant. Understanding the limitations in the data and modeling tools used for this analysis, should the region base major policy decisions on this information? We would recommend taking a more fine-grained approach, looking at hotspots and major corridors in the system to determine whether adjustments to the proposed jobs and housing locations and densities would make a difference, so that a more nuanced alternative can be developed.

There is only one criterion, “Delay”, that can be applied to determine the impacts of the alternatives on freight mobility. Yet, freight mobility is critical to the economy of the region, and thus, the ability of local jurisdictions to fund the transportation, energy, and public services and infrastructure, necessary to implement any of the RGS alternatives. This concern is compounded by the fact that there is very little differentiation in the number of hours of delay among the alternatives, rendering an evaluation of the economic impact of delay on truck movement almost moot. An evaluation that is focused on the T-1 and T-2 FGTS system and the monetized truck delay at existing and future freight bottlenecks, could help provide better data on the impact of the alternatives on freight mobility.

In recent years, we have watched the exponential growth of both Transportation Network Companies (TNCs) like Uber and Lyft, and e-commerce with great interest. Emerging research indicates that TNC trips replace transit, walking and biking trips, and there is evidence that e-commerce, with short delivery windows, and a multitude of smaller vehicles making deliveries, similarly increases congestion and related air emissions. We would like to know to what extent these trends are included in the analytical work resulting in the data provided in Table ES-3.

Enumeration of Potential Mitigation Measures Throughout Chapter 4 Per our cover letter, the needs of ports and MIC’s have frequently been overlooked during the crafting of draft Multicounty Planning Policies. The following Chapter 4 policy placeholders raise issues for ports and MIC’s.

Table 4.1-4. Potential Mitigation Measures: Housing and Employment

- Rezone for increased density near transit and services, unless located within a MIC

Table 4.2-1. Potential Mitigation Measures: Land Use

- Work with jurisdictions to properly phase growth concurrent with needed infrastructure
- Promote transportation investments that serve increased support increased concentrations of population and employment
- Promote higher densities near transit, in zones that allow for housing, and encourage transit-oriented development, recognizing that TOD will look different in a MIC where the focus is employment

Table 4.3-3. Potential Mitigation Measures: Transportation • Recognize the last 50 feet in goods delivery, manage the curb

- Encourage safe routes to school to include non-motorized routes and program support

Table 4.4-2. Potential Mitigation Measures: Air Quality Topic: Localized Emissions

- Incorporate trees and vegetation in urban development and retrofit projects
- Consider proximity to sensitive populations (children, elderly) in siting development and transportation infrastructure
- Identify localized air quality impacts, and prioritize mitigation projects for the most vulnerable populations
- Consider policies to prohibit idling

*These are already covered by the regional emissions section *

Table 4.5-1. Potential Mitigation Measures: Ecosystems

- Design and construct transportation facilities to maintain species and ecosystem functions, considering hydrological and ecological connectivity
- Implement the Regional Open Space Conservation Plan (PSRC 2018j) at the local level This was not presented as a regulatory document, nor as future policy guidance to be included in Vision
- Locate, design, and maintain stormwater management facilities to maximize benefits to pond-breeding amphibians (Wind 2015)* Stormwater management is already heavily regulated*

Table 4.6-2. Potential Mitigation Measures: Water

- Improve stormwater detention and treatment systems, including “green” stormwater infrastructure
- Pursue low-impact development techniques to minimize impervious surface
- Implement “best practice” construction practices
- Control land use in areas susceptible to groundwater contamination
- Limit development of impervious surfaces over recharge areas
- Update development standards to minimize impervious surface* Already regulated *

Table 4.8-1. Potential Mitigation Measures: Parks and Recreation Resources

- Include bike lanes, broad sidewalks, and shared-use paths in comprehensive planning for new transportation and recreation development and redevelopment designed to be practical, useful, and safe for all likely users of the transportation system

Table 4.13-1. Potential Mitigation Measures: Earth • Strengthen critical areas ordinances, development codes, and building standards for structures located within hazard areas* This has been accomplished*

Attachment to April 26,2019 DSEIS comment letter

March 19, 2018

The Honorable Ryan Mello Chair,

Growth Management Policy Board (GMPB)

Puget Sound Regional Council

1011 Western Ave., Ste. 500

Seattle, WA 98104

VIA EMAIL: VISION2050@PSRC.ORG

Re: SEPA scoping comments for Vision 2050 Plan

Dear Chair Mello,

Thank you for the opportunity to provide scoping comments on the Vision 2050 Plan development process. This letter and the attached detailed comments represent the collective perspective of the ports of Bremerton, Everett, Seattle and Tacoma along with The Northwest Seaport Alliance. Our programs touch the lives of Puget Sound residents in numerous ways, ranging from economic engines such as the state's largest cargo terminals to quality of life through our travel and recreation facilities.

We appreciate PSRC's efforts to facilitate a regional conversation about planning. We realize how high the stakes are against a backdrop of headlines about both immense prosperity and a homelessness epidemic. But we know that at the heart of the right land use planning strategy is job creation and we know that Washington is consistently rated as one of the most business-friendly states. Also, globalization is a force that cannot be denied – and Washington is amongst the most trade-dependent states.

For this reason we highlight the importance of the region's industrial lands and the jobs they create. The discussion of industrial lands in the PSRC Centers Framework project attracted a great deal of attention from cities across the region. This is a testament to their status as assets to the regional economy and the need for continued protection. Attachment to April 26, 2019 DSEIS comment letter 2 A second issue we wish to highlight for the Vision 2050 process is the importance of freight mobility. All of the region's residents have an interest in freight mobility and scoping is the perfect time to make sure we have the right analytical approach to properly forecast and plan for freight mobility.

We invite you to review the attached detailed comments and look forward to working with you, the GMPB and additional stakeholders on Vision 2050.

Sincerely,

Commissioner Peter Steinbrueck Port of Seattle Commissioner and Northwest Seaport Alliance
Managing Member

GMPB Ports Representative

Attached: Detailed Comments **

**

Scoping For the Vision 2050 Process: Detailed Comments

The ports of Bremerton, Everett, Seattle and Tacoma, along with the Northwest Seaport Alliance, are pleased to join together to submit these detailed comments on scoping for the Vision 2050 Plan. Undertaking major infrastructure investments – and understanding how that infrastructure attracts and anchors commerce – is at the heart of our work as port authorities. Our approach to infrastructure is aligned with the Growth Management Act's goal for efficient utilization of urban infrastructure. We share the following comments:

Environment and Sustainability

VISION 2040 calls for coordinating environmental planning in the region and using the best information possible at all levels of environmental planning. It recognizes that a healthy environment translates into better human health and improved habitat for wildlife. Specifically, MPP-En-3: Maintain and, where possible, improve air and water quality, soils, and natural systems to ensure the health and well-being of

people, animals, and plants. Reduce the impacts of transportation on air and water quality, and climate change. We would support similar goals and policies, consistent with our long term goals, for Vision 2050.

Industrial lands and Manufacturing / Industrial Centers

- As with other forms of employment centers, great care is needed in the designation of Manufacturing / Industrial Centers (MICs). However, the needs of MICs differ from other centers in important ways. Chief amongst these differences are that residential uses are not compatible with MICs and serving a MIC with transit involves challenges not present in other centers.
- As Vision 2050 is scoped and analytical work is performed, earlier analyses of industrial lands can be instructive. Just to note a few issues that have arisen in earlier analyses of industrial land:
 - o Past analyses have relied heavily on coding under the North American Industrial Classification System (NAICS) for all jobs in a given area. The results can be misleading since NAICS is concerned with the economic function of a given firm, not the land use. As an example, a marina is completely compatible with industrial zoning yet its NAICS code falls into a family of NAICS codes that are all recreation and leisure-oriented businesses.
 - o Non-industrial businesses located in an industrial land can skew the picture for the number industrial jobs in that area. This is because uses like railyards, cargo terminals and warehouses have a low density of industrial jobs, yet these uses may be functioning as anchors to the industrial area.
 - o Similarly, the value of cargo terminals and railyards is not captured by analyses that rely on assessed improvement values (building values) as a proxy for economic impact.
- Industrial areas adjacent to downtowns can face persistent pressure to convert to non-industrial uses. Industrial zoning is not always crafted in a way that prevents new uses from becoming established at a critical mass. This, in turn, fuels speculation of future upzoning of the area. Regional MIC designation can help provide certainty to land owners that the area will remain industrial. Port of Everett's program to record notices on the property titles for neighboring properties is an example of the extreme measures required when sensitive uses are not adequately buffered from industrial uses.
- Most industrial areas can trace their history to critical infrastructure such as seaports, airports, or rail lines. As pressures mount to convert industrial areas, planning policies must recognize situations where it is impractical or impossible to relocate the infrastructure. Deep water ports are a prime example of such infrastructure.
- The MICs in the region should each be allowed to grow according to their individual merit and their natural advantages. The system of regional designation of MIC's should not pit the MICs against each other.
- Also important to our region is understanding and responding to the region's aviation needs. We expect that Vision 2050 planning can make use of findings from PSRC's regional aviation baseline study.

Freight Mobility

- Economic growth: We appreciate PSRC's Transportation 2040 Update draft's inclusion of our region's economic strategy goal to "compete globally," and the reference to strategies that are designed to

support industrial lands, maritime sites, trade and logistics infrastructure, and freight mobility. Ensuring that freight can reach our facilities is critical to our success. For that reason, we would encourage PSRC to use, and further develop existing land use and transportation planning tools to ensure that both PSRC's land use planning and transportation program development protect, preserve and improve existing maritime, rail and truck infrastructure, especially in the region's MICs, and along the corridors that provide access to these areas. Please be sure to include improvements to these models in your scope of work for Vision 2050.

Your own Transportation 2040 update shows the importance of making this effort: Figure 11 , in Appendix J, the Freight element, shows that between 2016 and 2040, truck tonnage is expected to increase by 56%, far outpacing both employment (40%) and population (26%) growth. The federal government is projecting that annual tons per capita will increase by 27 percent from 55 in 2010 to 70 in 2040.² Our region would be remiss in not addressing these dramatic increases in the movement of cargo, most of which will occur by truck, so that it does not hamper future economic growth.

1 Transportation 2040 Update, Appendix J, p. 1.

2 FHWA, Freight Facts and Figures, 2010.

- Innovation: Technological innovation in connected and autonomous vehicles, shared mobility solutions, and ITS enhancements have the potential to greatly enhance our region's ability to manage ever increasing demand for scarce transportation infrastructure. This is true for both the movement of people and goods and Vision 2050 must address both. Consider that connected vehicle technology, efforts such as FHWA's Freight Advanced Traveler Information Systems (FRATIS) program, implementation of block-chaining technology in logistics, and extending signal priority to trucks along major freight corridors are viable solutions to improving freight mobility. Implementation of freight supportive technologies like these should be supported by Vision 2050. We would be happy to work with our staff and the relevant advisory committees on these issues.
- Regional integrated freight network: PSRC's freight network is currently focused on major freight facilities in region, but unfortunately, it is based on incomplete information. Appendix J of the Transportation 2040 Update draft, provides a good overview of some of the major freight facilities in the region. This includes marine- and airports, all rail facilities (including yards and related lead tracks,) and pipelines in addition to T-1 and T-2 truck corridors. However, not all jurisdictions consistently and thoroughly report data on truck volumes on major truck corridors to WSDOT, so the system is incomplete. Another issue of concern is that there is comparatively little coordinated effort to ensure that jurisdictions along truck freight corridors maintain system continuity. We hope PSRC can address these issues as part of Transportation 2050. The system map also does not yet include designated over-legal routes, or heavy haul routes important to the ports, and the regional economy. A more robust regional freight network must be supported by a grant funding distribution scheme that maintains and improves the functionality of the existing system while providing investment in strategic system expansion.
- Data and analytics: Appendix J of the Transportation 2040 Update draft, while providing a wealth of data from federal and state sources, clearly shows that PSRC is currently lacking detailed data, modeling, and analysis tools to determine local and regional freight activity, performance, and needs. We strongly encourage PSRC to scope, and budget for, a more robust freight data collection and analysis approach

that provides quantitative information on the corridors critical to freight as part of Vision 2050. This effort should support the development of a more robust freight plan, similar to the approach taken by the Southern California Association of Governments (SCAG,) in Transportation 2050.

Commenter(s):

Port of Seattle, Port of Tacoma, Port of Bremerton, Port of Everett, Peter Steinbrueck

Puget Sound Clean Air Agency

Communication ID: 354744

04/29/2019

April 29, 2019

PSRC

ATTN: VISION 2050 SEIS Comment

1011 Western Avenue, Suite 500

Seattle, WA 98104

RE: VISION 2050 SEIS Comment

Dear Executive Board members and Executive Director Brown: Thank you for the opportunity to comment regarding the VISION 2050 Growth Strategy Draft Supplemental Impact Statement.

We appreciate that the Puget Sound Clean Air Agency's climate target is included in the report: 50% reduction in greenhouse gas (GHG) emissions by 2030, and 80% by 2050 (both from 1990 levels). We look forward to working with PSRC to reduce GHG emissions in the transportation sector. Specifically, we look forward to achieving emissions reductions that are 'above and beyond' those laid out in the T2040 4-part strategy. Now more than ever, with potential rollbacks at the federal level, it's essential that we make progress on GHG emissions reductions at a local level.

We will continue to share data and collaborate with PSRC to ensure agencies understand similarities and differences between various emissions reductions goals. PSRC served as a key technical reviewer as we prepared our 'candidate action report' that laid out potential strategies to reduce transportation GHG emissions in the Puget Sound region. These potential strategies are best summarized in our 'wedge' chart that shows how each individual strategy contributes to the ultimate goal, in terms of tons carbon dioxide equivalent emissions reductions over time. We urge PSRC to create similar 'wedge' charts, and are happy to support them in doing so. These charts can help to provide policymakers context to effectively compare and contrast the impact of projects and programs to achieve overall GHG emissions reductions goals.

Sincerely,

Craig Kenworthy

Executive Director

Commenter(s):

Puget Sound Clean Air Agency, Craig Kenworthy

Snohomish County Tomorrow

Communication ID: 354730

04/29/2019

April 29, 2019

Erika Harris, AICP

Senior Planner, SEPA Responsible Official, SEIS Project Manager

Puget Sound Regional Council

1011 Western Avenue, Suite 500

Seattle, WA 98104-1035

SUBJECT: Snohomish County Tomorrow – Comments on the Draft SEIS for VISION 2050

Dear Ms. Harris,

Snohomish County Tomorrow (SCT) appreciates the opportunity to comment on the Draft Supplemental Environmental Impact Statement (DSEIS) for VISION 2050. These comments build on SCT's recommended approach to the VISION 2040 update, as outlined in a letter to PSRC on December 17,

2017.

Many of the suggestions and new concepts that were provided in our letter have been incorporated into the VISION 2050 project. SCT appreciates the extent to which these suggested changes and improvements to the regional plan have been accepted by PSRC into the approach to VISION 2050. SCT also wishes to thank PSRC staff for the extra support they provided to the SCT committees during the DSEIS review process, including a description of the impacts of the three DSEIS alternatives specific just to Snohomish County. This additional material has helped us provide to you our comments on the DSEIS and recommendation for a preferred alternative.

SCT recommends the transit focused growth alternative as the preferred alternative, with some minor adjustments to the population distribution, as described below.

Preferred Alternative – Transit Focused Growth

The December 2017 SCT letter recommended that PSRC use a new approach to develop the Regional Growth Strategy (RGS) growth allocations for VISION 2050 that would focus growth around regional and local growth centers and along major transportation and freight corridors, instead of assigning growth distributions to various categories of jurisdictions based on municipal size and type. The VISION update was also encouraged to recognize that Sound Transit and Community

Transit have made significant planning progress for the light rail and BRT systems in Snohomish County and that VISION 2050 should

recognize and support the integrated planning that is occurring. These planned investments suggested that additional growth and density can be supported in Snohomish County's southwest urban growth area, including unincorporated and incorporated areas near high capacity transit stations beyond jurisdictions that are currently categorized as Metropolitan and Core cities.

The alternative which most closely matches the SCT recommendation for a revised approach to the RGS growth distributions is the transit focused growth alternative. This alternative assumes a compact growth pattern with accelerated growth near existing and planned high capacity transit investments, including light-rail, bus rapid transit, commuter rail, and ferry terminals. This alternative would result in the largest shares of growth to Metropolitan Cities (Everett), Core Cities (Bothell and Lynnwood), and High-Capacity Transit (HCT) Communities¹.

Outside Metro and Core cities, the transit focused growth alternative places the greatest shares of future growth in the HCT Communities in Snohomish County along high-capacity transit corridors where major investments are being made to create more efficient and frequent options for transit connections and mobility throughout the region.

Growth to other cities and towns would be distributed under this alternative based on the broad objectives for the Regional Growth Strategy. Growth in rural areas and unincorporated areas without access to high-capacity transit and unaffiliated unincorporated areas is the lowest in this alternative, even with the recommended adjustments described below.

Minor adjustment for population recommended to the Transit Focused Growth alternative

SCT's recommended population allocations to outlying unincorporated areas would be slightly increased as a result of shifting 4% of the county's population growth from HCT Communities to the Unincorporated Urban and Rural area geographies to help make these distributions more achievable:

Under the transit focused growth alternative, only 2% (10,000) of the county's 2017-2050 population growth is assigned to rural areas, down sharply from 10% in VISION 2040 and 8% in our current CPPs. The transit focused growth alternative's assignment of only 10,000 population growth to rural areas over the next 35 years amounts to about what Snohomish County currently typically experiences during a single decade. To limit rural growth to just 2% would be a challenge not just from a zoning perspective, but also from the perspective of limiting the ability of property owners to develop on existing (pre-GMA) substandard vacant lots². The suggested recommendation would be to allocate a potentially more achievable

¹ HCT Communities include cities (other than Metropolitan and Core cities) and unincorporated urban areas (planned for annexation or incorporation) with existing or planned high-capacity transit service. They include the cities of Arlington, Edmonds, Marysville, Mill Creek, Mountlake Terrace, and Mukilteo; and the following unincorporated portions of the southwest UGA: Bothell MUGA, Edmonds MUGA, Everett MUGA, Larch Way Overlap, Lynnwood MUGA, Mill Creek MUGA, and Mukilteo MUGA. This proposed new regional geography directly responds to the December 2017 SCT suggestion that additional growth and density can be supported in Snohomish County's

southwest urban growth area, including unincorporated and incorporated areas beyond jurisdictions that are currently categorized as Metropolitan and Core cities.

2 To get a general sense of the number of parcels that could potentially meet this definition, a GIS query was run of

Assessor parcels outside the UGA in Snohomish County, excluding those recorded since 1995, that were less than

200,000 square feet and greater than 20,000 square feet in size, and were classified as vacant. This resulted in a

growth share reduction in rural areas of 6% (25,000 new residents over 35 years), which is about

4 percentage points less than our current rural growth trends indicate and the lowest share of county population growth going to rural areas compared with the other two alternatives studied. SCT does not support changes to rural zoning and regulations that would reduce the number of lots already legally created in the rural areas.

? Similarly, the Unincorporated Urban geography has a challenge of limiting population growth over the next 35 years to just 3% (12,000 new residents), given that some of these areas represent sizeable development potential with existing or planned high capacity transit service (Cathcart, Lake Stickney gap area). The suggested adjustment would be to make the allocation more realistic by increasing the population growth assignment to 18,000 (4%) for these areas.

Even following the shift of 4% of the county's population growth from HCT Communities to the Unincorporated Urban and Rural area geographies, half of Snohomish County's 2017-2050 population growth would be assigned to the HCT Communities geography – the largest share of county population growth projected for any of the regional geographies.

We anticipate that a characterization of the impacts associated with these minor adjustment to the transit focused growth alternative in Snohomish County would be in the range of impacts analyzed in the DSEIS but request that the analysis confirm this assumption during preparation of the Final SEIS.

Favorable results from the analysis of impacts of the alternatives

The analysis of the regional impacts for the three alternatives studied in the DSEIS show that the transit focused growth alternative showed the greatest reduction in impacts across a range of environmental indicators that were studied, compared with the "No Action, Stay the Course" alternative. This observation was also made when the impacts of the alternatives were studied specific to Snohomish County.

Other RGS and VISION-related considerations are discussed below.

Jobs/Housing Balance

For the VISION 2050 transit focused growth alternative, a policy decision to shift 5% of the region's employment growth from King County to the outlying counties was made, resulting in Snohomish

County receiving 2% more of the region's employment growth to 2050 compared with the no action alternative. This resulted in an improved jobs/housing balance at the county level with the transit focused growth alternative compared with the no action alternative, however the increase was marginal. PSRC should consider evaluating further decentralized employment growth in the region, especially anticipating a time when the region's high capacity transit system is more extensive and more fully built out.

In Snohomish County, an upward adjustment to future employment growth may be justified by recent events not studied in the DSEIS that would potentially facilitate greater interest in employers choosing sites in the Paine Field area (in response to the recent arrival of commercial airline service) and count of 3,331 parcels. At 2.7 persons per unit, this source of potential capacity alone could account for a future 9,000 population increase outside the UGA.

Arlington-Marysville area (in response to an anticipated designation of this area by PSRC as a regional Manufacturing/Industrial Center).

SCT requests that VISION 2050 include UGA boundary flexibility to allow for changing population distribution, taking into consideration logical service and natural boundaries.

Timing of Growth

An understanding of the timing of when the transit focused growth distributions could be expected to be realized over time is not apparent in the DSEIS analysis. The transit focused growth alternative may be the preferred choice, but some consideration may need to be made to the fact that there is still some time before significant segments of the regional transit investments are complete. The VISION update should evaluate a timing component to the regional growth strategy that includes interim-year growth assignments so that a rationale for eventual realization of the 2050 growth assignments can be articulated and understood. Local jurisdictions would be able to use this information to not only plan for where the growth is likely to occur, but also when it would likely occur based on transit construction and corresponding market adjustments. This should also include an assumption regarding potential

post-2036 high capacity investment and implementation decisions (e.g., Sound Transit 4) that the region may make well before the end of the 2050 plan horizon.

Flexibility for Subsequent Countywide Target Setting Process

As stated in our December 2017 letter, SCT believes that the growth figures provided in the RGS should recognize economic fundamentals and realistic timelines for realization of these shifts in future growth distributions. This recognition is warranted given the uncertainties in timing of the necessary urban infrastructure investments and anticipated market responses. As such, the RGS growth allocations should be provided by PSRC as guidance to the subsequent Countywide Planning Policy/local target setting process. The region needs to be able to adapt and adjust when unforeseen shifts in the regional economy occur or growth opportunities in local urban centers in cities and towns change the fundamental assumptions used to establish the growth assignments.

This recommendation extends to the idea that the transit focused growth alternative's goal of directing 75% of the region's population and employment growth to areas in close proximity to the

existing and planned high capacity transit station area locations was intended to be a modeling goal rather than an exact policy goal. This modeling goal should result in a population and employment growth distribution by regional geography that will be the basis for disaggregating to individual jurisdictions within each regional geography through the countywide planning process, and there should not be an expectation that each Metro and Core cities, and HCT Communities' local plans will demonstrate accommodation of

75% of its assigned growth within the specific vicinity of the station areas. Instead, each jurisdiction has flexibility in designing a land use element that adequately responds to the RGS regional geography- based distribution and other policy directions provided by the MPPs and CPPs.

VISION 2050 should also recognize that market factors and consumer choice are primary drivers of population distribution. While SCT's recommended VISION 2050 regional growth strategy relies on a transit focused growth alternative, local flexibility and authority must be maintained in order to respond to and anticipate actual growth patterns.

Moderate density housing

According to the DSEIS, all three alternatives result in a lower share of moderate density housing in the future than today. However, moderate density housing is important as a source of more affordable market-rate housing and for accommodating growth within UGAs. A preferred growth alternative focused around high-capacity transit should still allow jurisdictions to encourage more moderate density housing production in the future, compared to what was modeled in the DSEIS.

Transportation

Snohomish County, the cities within it, and the region as a whole have invested significantly in transit and facilities that support transit. The adopted RGS should facilitate development that encourages a growth pattern that leverages these investments, especially around access to the locations where billions of dollars are being invested in the high-capacity transit system (ST 2, ST 3, and Bus Rapid Transit locations).

VISION 2050 should continue VISION 2040's previous efforts to coordinate land use and transportation planning, including improving access to transit stations, and studying and planning for freight mobility (critical to the County's and region's economy), additional infrastructure, and partnerships that will be needed to realize this vision, such as increased coordination with WSDOT. PSRC should work closely with and encourage WSDOT's Office of Urban Mobility and Access to plan and clearly show how the state transportation system will serve in a comprehensive way with the region's high capacity transit system to support the projected growth. VISION 2050 should set the stage for this work so that it can be further developed in Transportation 2050.

Tribal Growth

The proposed Regional Geographies map shown in the DSEIS for VISION 2050 shows Tribal Lands separate from Rural Areas. For Snohomish County, the Tulalip Reservation is shown (suggesting that the legend may need to be updated to reference Reservation/Tribal Lands). This is a change from the Regional Geography map used in VISION 2040 in which the Tulalip Reservation was shown as part of the Rural Area. With this map change for VISION 2050, it appears that the Rural growth

assignment would exclude the Tulalip Reservation. Accordingly, our interpretation of this mapping change is that population and employment growth that may occur on Reservation Lands are not guided by the RGS allocations since these areas are sovereign nations not subject to GMA and VISION 2050 planning requirements. This understanding that Tribal growth that may occur is not counted as part of a county's rural growth, however, is not explicitly acknowledged in the DSEIS, but should be acknowledged in the Final SEIS and in VISION 2050. If not counted as part of the county's rural growth assignment, is growth on Reservation Lands also not part of the countywide growth assignment under the RGS? And if not, what are the implications of this on our ability to plan comprehensively for the county's transportation system needs?

There are other Reservation Lands in Snohomish County that do not appear to be mapped in the proposed Regional Geographies map (e.g., Stillaguamish Tribe). However, these additional Reservation Lands should also be recognized in VISION 2050 as not being guided by the RGS allocations.

Social equity

SCT appreciates the information and evaluation of social equity impacts across the alternatives. PSRC's work in this area has raised awareness locally of the urgent need to address proactively the diversity in the demographics of population growth and particularly the potential displacement of people of color, low income and other at risk populations in areas that are likely to redevelop. As we have seen in other parts of the region, these populations are often disproportionately affected as a result of their proximity to future light rail stations.

In closing, it is worth noting that favorable feedback has been received on the transit focused growth alternative during other recent interjurisdictional forums. The Snohomish County VISION 2050 Growth Summit 2, held on March 21, 2019, had over 100 attendees representing elected officials and staff from our cities and the County, water and wastewater providers, higher education, Community Transit, Sound Transit, PSRC, WSDOT, Tulalip Tribes, affordable housing providers, Snohomish County Public Utilities District, and consulting firms. The event was jointly sponsored by the Snohomish County Cities and Snohomish County Tomorrow. The focus of the Summit was to understand and discuss PSRC's three growth alternatives and the potential impacts of each alternative for Snohomish County. Overall, there was general support expressed for a future growth distribution pattern that recognized the importance of our existing and planned transit system for providing improved regional mobility for future

households and employers.

Please feel free to contact us with any questions.

Thank you, again, for the opportunity to comment in advance of determining a preferred alternative for

VISION 2050. Sincerely,

Nate Nehring, Co-Chair

SCT Steering Committee

Liam Olsen, Co-Chair

SCT Steering Committee

Dave Somers, Vice-Chair

SCT Steering Committee

Barbara Tolbert, Vice-Chair

SCT Steering Committee

cc: SCT Steering and Planning Advisory Committees

Barb Mock, Director, Snohomish County Planning and Development Services

Lacey Harper, Executive Chief of Staff

Paul Inghram, PSRC

[Commenter\(s\):](#)

Snohomish County Tomorrow, Nate Nehring, Liam Olsen, Dave Somers, Barbara Tolbert

Sound Transit

Communication ID: 354697

04/29/2019

April 29, 2019

Erika Harris

Senior Planner & SEPA Responsible Official

Puget Sound Regional Council

1011 Western Ave, Ste 500

Seattle, WA, 98104

Subject: VISION 2050 Draft SEIS Comment

Dear Ms. Harris:

Thank you for the opportunity to comment on the VISION 2050 Draft Supplemental Environmental Impact Statement (DSEIS). The Puget Sound Regional Council's (PSRC) role in coordinating land use and transportation planning in the region is essential, and this role rests on the multicounty planning policies articulated by the VISION plan. On behalf of Sound Transit, I would like to make a few comments about the VISION 2050 DSEIS:

Support for VISION's core premise. Sound Transit strongly supports the central philosophy underpinning VISION 2040 and each of the alternatives considered, namely that regional planning efforts "help preserve resource lands, protect rural lands from urban-type development, and promote infill and

redevelopment within urban areas to create more compact, walkable, and transit-friendly communities.”

DSEIS alternatives. The alternatives identified purport to achieve the core premise identified above though with trade-offs in how growth is distributed. Per the table in the Executive Summary, it appears that the “Transit Focused Growth” alternative creates fewer impacts than the other alternatives and therefore appears more likely to achieve the goals identified in the VISION plan. However, two points seem worth noting:

First, it is not clear how the allocation of “75 percent of the region’s population and employment growth to occur within a quarter- to a half-mile from current and planned high-capacity transit station areas” in the “Transit Focused Growth” alternative was determined and then how this growth was allocated. How was this percentage determined and were other allocation proportions considered? And, given the different characteristics of transit service between light rail, bus rapid transit, commuter rail, ferries, and streetcar, was any consideration given to the context of the type of existing or planned high capacity transit when allocating this growth?

Second, the decision to utilize different growth allocations (one for “Stay the Course” alternative and another for the “Transit Focused Growth” and “Reset Urban Growth” alternatives) is confusing and not well-explained in the DSEIS, particularly in Chapter 3. Given the seemingly significant differences in population growth by county between “Stay the Course” and the “Action Alternatives” (e.g. Table 3.1-4 on page 84), additional clarity is warranted.

****Transit-oriented communities, development, and housing. ****The development of VISION 2050 is happening in a period of regional population and employment growth with little precedent and, as such, a focus of the DSEIS is on how to accommodate this growth in a way that achieves desired regional goals and outcomes. In 2018, the Sound Transit Board of Directors adopted an Equitable Transit Oriented Development policy. This policy is supportive of regional growth plans, policies, and strategies (including VISION 2040 and the Growing Transit Communities Strategy), and makes equitable transit oriented development an integral component of high capacity transit project planning and delivery. As VISION 2050 is further refined and eventually adopted, Sound Transit will continue to work with all our partners and stakeholders to achieve this fundamental component of the plan’s success.

Transportation and transit. Reiterating a comment from Sound Transit’s letter on the VISION 2050 SEPA Scoping Notice from March 2018, we continue to encourage PSRC to document regional transportation issues that arise and communicate how they are incorporated into VISION 2050 and/or are considered in the subsequent update of the Regional Transportation Plan. A decision to focus growth in centers and near high capacity transit may significantly increase demand for the service that Sound Transit and our partner transit agencies provide. We appreciate that PSRC will extend the Regional Transportation Plan’s horizon year “in a separate planning process,” but we would request that VISION 2050 clearly articulate the priorities for that process to consider to ensure a commitment to integrated land use and transportation planning.

Social equity considerations. Sound Transit appreciates PSRC’s emphasizing the potential effects and impacts to communities of color and low-income communities from the alternatives considered. As a preferred alternative is developed, we encourage PSRC to identify necessary mitigations as well as policy responses from land use and transportation authorities to achieve the desired equity outcome that “all

people can attain the resources and opportunities to improve their quality of life and enable them to reach their full potential.”

I want to commend PSRC staff for the clarity of information presentation, especially in the Executive Summary’s comparisons of the different alternative’s impacts. Sound Transit looks forward to continuing our active participation and contributions to the VISION 2050 process. Please let me know if you have any questions about our comments to the VISION 2050 DSEIS or if you would like to discuss further how PSRC and Sound Transit can collaborate on the development of VISION 2050.

Sincerely,

Matt Shelden, AICP

Deputy Executive Director, Office of Planning & Innovation

cc: Don Billen, Executive Director, Planning, Environment, and Project Development

Ann McNeil, Chief Government & Community Relations Officer

Brooke Belman, Deputy Executive Director, Office of Land Use Planning & Development

Alex Krieg, Senior Manager – Planning & Integration

[Commenter\(s\):](#)

Sound Transit, Matt Shelden

State Agency

[Washington State Department of Archaeology and Historic Preservation](#)

[Communication ID: 354154](#)

[04/19/2019](#)

Hi Erika, attached please find a pdf of our comment letter to you about the VISION 2050 DSEIS. Generally speaking, we are urging that cultural resource protection comes to play a larger role in implementing whichever one of the 3 alternatives are selected by the PSRC to adopt. We welcome the opportunity to work with PSRC to achieve that. Feel free to contact me with any questions. Thank you.

Greg Griffith

Deputy State Historic Preservation Officer

April 19, 2019

Ms. Erika Harris

SEPA Responsible Official

Puget Sound Regional Council

1011 Western Avenue, Suite 500

Seattle, WA 98104-1035

In future correspondence please refer to: Project Tracking Code: 2019-04-02527

Re: VISION 2050 Draft SEIS

Dear Ms. Harris:

The Washington State Department of Archaeology and Historic Preservation (DAHP) has taken the opportunity to review the Draft Supplemental Environmental Impact Statement (DSEIS) for VISION 2050 in regard to impacts upon cultural resources (including archaeological, cultural, and historic resources) affected by adoption of VISION 2050 for growth management in the Central Puget Sound region. In response, we have reviewed the DSEIS and as a result of our review, we are providing the following comments and recommendations for your consideration.

1. Although included in Table ES-2 on page ES-15, in Table ES-3 Summary of Comparison of Alternative Impacts, we do not see a summary comparison of impacts on archaeological, cultural and historic resources.
2. In 1.2.1 under the Growth Management Policy Board's desired outcomes for Vision 2050 (also listed on pages ES-4/5) it is disappointing that preservation of heritage related resources is not included as a desired outcome for the region in 2050. As a note, in DAHP's own current work to update the Washington state historic preservation plan, the agency received hundreds of comments about the importance of preserving heritage resources for quality of life and economic development reasons as well as being of value to pass along to future generations.
3. On page 9 in chapter 2, archaeological, cultural, and historic resources are listed as resource types that have had a similar level of impacts since VISION 2040. We agree that all categories of cultural resources have been experiencing basically the same impacts (i.e. development pressures, disinvestment, land conversion, vandalism, natural causes, etc.). However, DAHP contends that over the past decade there has been a significant increase in the trend of heritage resources being lost or adversely impacted.
4. In section 2.13, generally speaking, DAHP agrees that "The types of historic, cultural, and archaeological resources and their distribution throughout the region have not changed substantially compared to the resources described in the VISION 2040 FEIS." In the last sentence in the last paragraph on page 66, it is not clear what is intended when mention is made of "these properties." We recommend revising this statement to read something like the following: "All types of archaeological, cultural and historic resources (including sites, buildings, structures, districts, objects, and landscapes) are in need of protection."
5. In addition, we recommend including in this section mention of pertinent regulations and sea level rise/climate change. In regard to regulations, it would be useful to mention Section 106 of the National Historic Preservation Act (NHPA) of 1966 that requires federal agency actions to consider the effect of their actions on National Register listed

or eligible properties. Unlike the protection requirements of the Endangered Species Act, the Section 106 process only requires consultation to consider project effects and mitigation when there are adverse effects on eligible or listed archaeological, cultural,

and historic resources. Also important to include in this text is information relating that state legislation (Archaeological Sites and Resources (RCW 27.53)) protects known and

discovered archaeological sites from disturbance on all lands.

6. In regard to Figure 2.13-1, it is unclear what exactly is being mapped as “Historic Sites.” While the source indicates the “National Register of Historic Places”, it is not clear what the dots on the map represent. We recommend this be clarified with text in the figure. However, beyond this recommendation is another concern we have about the map, which is that it leaves the impression that these “sites” are thinly scattered across the region (except for a few concentrations in Seattle and Tacoma) and therefore of little consequence to land use decision-makers. In actuality, DAHP’s WISAARD database of such resources includes not only National Register listed properties but also those determined National Register eligible plus inventoried properties that are 50 years of age and older. Not disclosable to the general public are thousands of recorded

archaeological sites. In essence, a more important message to convey in this section of

the document is that cultural resources (known and unknown) are recorded (many of which are designated) in all jurisdictions and potentially found wherever a shovel is put into the ground.

Referencing and/or including DAHP’s Archaeological Site Predictive Model in WISAARD (<https://fortress.wa.gov/dahp/wisaardp3/>) is recommended to include in this section as an important planning tool.

7. In regard to section 4.11, Historic, Cultural, and Archaeological Resources, we generally concur with the statements made in the text regarding how these resources will be impacted as a result of the alternatives. Though limited in number and scope, we also note and support the three Potential Mitigation Measures listed on page 152. Beyond the scope of the SEIS, a recommendation for the Puget Sound Regional Council is to build into VISION 2050 a menu of policies and strategies that local jurisdictions should implement that avoid, minimize, or mitigate negative impacts to cultural resources. It should be remembered that Historic Preservation, while a GMA goal, is not required to be addressed much less implemented in comprehensive plans. DAHP staff welcomes the opportunity to work with PSRC on this recommendation.

8. On page 171 in section 5.4.4, a sentence includes “historic housing stock” as one of “several key factors” that drive gentrification and displacement. A concern here is that citing “historic housing (which is unclear as to how that is defined in this context) as a key driver implies a cause and effect relationship that may be based on anecdotes, but not borne out in research. A recommendation would be to remove this sentence.

Finally, please note that in order to streamline our responses, DAHP requires that all documents related to project reviews be submitted electronically. Correspondence, reports, notices,

photos, etc. must now be submitted in PDF or JPG format. For more information about how to

submit documents to DAHP please visit: <http://www.dahp.wa.gov/programs/shpo-compliance>. To assist you in conducting a cultural resource survey and inventory effort, DAHP has developed guidelines including requirements for survey reports. You can view or download a copy from our website.

Thank you for the opportunity to review and comment. If you have any questions, please feel free to contact me at [phone number, email address].

Sincerely,

Gregory Griffith

Deputy State Historic Preservation Officer

c: Kim Dietz, City of Redmond

Cecile Hansen, Duwamish Tribe, Chairperson

Gretchen Kaehler, Snohomish County, HPO

Dennis Lewarch, Suquamish Tribe, THPO

Kerry Lyste, Stillaguamish Tribe of Indians, THPO

Reuben McKnight, City of Tacoma, HPO

Jennifer Meisner, King County, Historic Preservation Officer

Steve Mullen-Moses, Snoqualmie Nation, Director, Archaeology & Historic Preservation

Laura Murphy, Muckleshoot Indian Tribe, Cultural Resources

Adam, Osbekoff, Snoqualmie Nation, Assistant Director

Brandon Reynon, Puyallup Tribe, Cultural Resources

Sarah Sodt, City of Seattle, HPO

Karen Stewart, City of Everett, Historic Preservation

Chad Williams, Pierce County, Historic Preservation

Richard Young, Tulalip Tribes, Cultural Resources

[Commenter\(s\):](#)

Washington State Department of Archaeology and Historic Preservation (DAHP), Gregory Griffith

Washington State Department of Ecology

Communication ID: 354757

04/29/2019

April 29, 2019

Erika Harris, SEIS Project Manager

Puget Sound Regional Council

1011 Western Avenue, Suite 500

Seattle, WA 98104-1035

Re: Vision 2050 Draft Supplemental Environmental Impact Statement (SEIS) Ecology SEPA #201901078

Dear Erika Harris:

Thank you for the opportunity to provide comments on the Vision 2050 Draft SEIS. The three alternatives analyzed in the Draft SEIS provide a good range of options for how to accommodate future growth in the region. We support development alternatives that minimize development on ecologically important lands, minimize new impervious surfaces in the region's watersheds, and minimize emissions of greenhouse gases that lead to climate change. The Department of

Ecology (Ecology) has the following comments:

AIR QUALITY PROGRAM

Jean-Paul Huys, [phone number, email address]

Page 39: Nitrogen Oxide (NOx) is listed as a National Ambient Air Quality Standard (NAAQS) on the Draft Supplemental Environmental Impact Statement document. NOx is not a NAAQS. Nitrogen Dioxide (NO2) is the correct term.

Page 3: We recommend that you make the distinction between the WA Clean Air Act and the federal Clean Air Act. The federal Clean Air Act requires attainment and maintenance plans.

Page 39: We recommend that you define U.S.EPA in the acronyms section (p A-1).

P. A-1 of Appendix A: We recommend that you add the definition of Nitrogen Dioxide (NO2).

AIR QUALITY PROGRAM – CLIMATE CHANGE POLICY UNIT Gail Sandlin, [phone number, email address].

Table ES-3 provides a comparison of 2050 growth alternatives, including an assessment of greenhouse gas emissions (tons per day CO2e). Both the "Transit Focused Growth" and "Reset Urban Growth" alternatives were compared to "Stay the Course" greenhouse gas emissions. This is informative; however, how do these increases or decreases compare to regional greenhouse gas reduction goals provided in section 2.6.2. Both King County and Puget Sound Clean Air Authority adopted aggressive greenhouse gas emissions reductions for 2050, specifically 80% below baseline. It is difficult for the reader to understand how these goals are addressed by the Vision 2050 alternatives. A search of the Appendices does not provide clarification instead on page E-1, one is directed to a background paper for information on greenhouse gas sources and state / regional actions. This background paper does provide the King County ghg emissions baseline as 2007 and also includes reduction goals for the City of Tacoma and Snohomish County. Again more clarity in assisting the reader understand the alternatives with respect to achieving greenhouse gas reduction goals would be helpful.

Another comment is specific to forest carbon sequestration. Section 2.10.6 states “Forests in the region store 628 million equivalent tons of CO₂; loss of these lands would result in much of this carbon entering the atmosphere (PSRC 2018j).” The reference provided is the “Regional Open Space Conservation Plan, June 2018” which repeats the same sentence on page 15 with another reference, specifically to the calculation tool, i-Tree. Thus the reader is not provided a simple path as to how this forest carbon sequestration total was generated nor provided any of the assumptions stating that “loss of these lands would result in much of this carbon released to the atmosphere.”

For reference, see RCW 70.235.020(3).

Is this section of the PSRC Vision 2050 assuming potential loss of region’s silviculture sequestration capacity triggering the consideration of carbon dioxide emissions from biomass energy, that is, if the extracted urban canopy was used for such a purpose? Again more clarification in this section would be helpful to the reader.

TOXICS CLEANUP PROGRAM

Eva Barber, [phone number, email address].

Portions of this SEPA proposal are located in an area that may have been contaminated with heavy metals due to the air emissions originating from the old Asarco smelter in north Tacoma (<https://apps.ecology.wa.gov/dirtalert/>). It should be noted that the contamination associated with the former Asarco smelter also occurs in rural and undeveloped areas.

The link below provides a fact sheet that explains more how the arsenic and lead clean-up levels were set and why Ecology sees that they are protective for human health:
<https://fortress.wa.gov/ecy/publications/SummaryPages/1109095.html>

For assistance and information about Tacoma Smelter Plume and soils contamination, contact

Eva Barber with the Toxic Cleanup Program.

WATER RESOURCES PROGRAM

Stacy Vynne McKinstry, [phone number, email address]

Page 26: Figure 2.4-3 shows parcel sizes in the region’s rural areas. The distribution of parcel sizes is similar to that in the VISION 2040 FEIS, showing that parcels smaller than five acres are the dominant size and are located throughout the land designated as rural. Of the rural parcels that are less than 5 acres in size, about 60,000 are vacant, indicating the potential for substantial future rural development.

My understanding is that there are many caveats to the vacancy numbers and in reality, many of these parcels could never be developed.

Under the streamflow restoration planning process, Ecology is working with planning groups to project (under current policy) rural growth and associated new water use.

Based on historic patterns of rural growth within the counties, we anticipate growth in the rural areas over the next 20 years (and even at full build out) to be substantially less than what this statement implies.

Page 52: Washington State has developed a new streamflow restoration law (RCW 90.94) in response to the “Hirst decision.” Hirst was a 2016 Washington State Supreme Court decision that changed the way counties approve or deny building permits that use permit-exempt wells for a water source (Ecology 2018). The new streamflow restoration law requires watershed planning and establishes interim standards for new domestic water use and fees for building a permit exempt well. The law affects a majority of the watersheds in the region and planning is underway in applicable watersheds in coordination with Ecology.

The fee is a building permit fee (so for instance, if someone is replacing a permit exempt well but is not applying for a building permit, they would not be charged a fee).

Recognize that each of the counties covered by the PSRC are impacted and county staff are involved.

There are 7 planning processes that impact these counties (WRIAs 7, 8, 9, 10, 12, 13, 15).

One is completed (Nisqually) and a plan was adopted by Ecology by the statutory deadline of Feb 1, 2019. Six planning processes are underway and scheduled for completion under the statutory deadline of June 2021. Given the timing of the release of vision 2050, it would be helpful to put in dates associated with the plan development. They may also want to link to our streamflow webpage for updates on the planning process. - <https://ecology.wa.gov/Water-Shorelines/Water-supply/Streamflow-restoration>.

The planning process will lead to projects that offset new permit exempt wells. It is such a narrow focus that it might be helpful to state this instead of leaving open to interpretation what “watershed planning” includes.

SHORELANDS AND ENVIRONMENTAL ASSISTANCE PROGRAM Maria Sandercock, [phone number, email address]

Comments on Affected Environment

Parks and Recreation: Since the 2040 FEIS, King County has begun operating the Trailhead Direct Shuttle, which provides access to hiking areas from some urban areas during summer. This may be worth including in the discussion in the “Access to Wild Open Spaces” section.

Comments on Environmental Effects and Mitigation

Land use mitigation measures:

Urban lands. In all alternatives, increased development in urban areas may impact ecological resources. Retaining these areas is important for ecological function and also maintaining quality of life for residents, who receive numerous benefits from nearby open spaces. Some additional mitigation measures to consider include: Identify

remaining ecological areas/corridors within urban areas that need protection; and develop urban forestry programs.

Rural lands: As identified in Chapter 2.4, there is capacity for development in rural areas with 60,000 vacant parcels smaller than 5 acres. We recommend identifying potential mitigation measures for this,

or alternatively identifying the need for strategies/tools for counties to minimize development that is out-of-character with rural areas.

Ecosystems:

Impacts by geography:

* HCT Communities: The Draft SEIS states that “Growth would likely occur by increasing density around high-capacity transit investments in urban areas that are close to existing city centers. These areas likely have less-intact ecosystems, similar to Metropolitan and Core Cities. Development in these areas could result in low to moderate impacts to ecosystems” (Page 129). We recommend identifying any remaining ecologically important areas in the areas around future transit stations so that future station-area planning can consider these areas and protect them where possible. Further, retaining some open space in these areas can help attract future residents to an otherwise dense urban area and improve quality of life.

* Cities and Towns: The Draft SEIS states that “Development in these areas could cause a proportionally larger alteration in land cover and vegetation than in more densely developed areas. Compared to the denser urban areas, added infrastructure could pose a greater risk of bisecting currently intact functioning ecosystems and habitats” (Page 129). To mitigate for this potential, we recommend that Cities and Towns identify ecologically important areas (using both the Regional Open Space Conservation Plan and also local information) and incorporate this information into their planning decisions.

General mitigation measures suggestions: Identify and map habitat corridors and intact remaining habitat areas at the local jurisdiction level using the Regional Open Space Conservation Plan as a starting point.

Parks and Recreation:

The Draft SEIS identifies the potential for degradation of natural areas from increased use of open spaces as population increases and access to open space increases. We recommend that mitigation measures for this potential impact be identified. This could include working with local recreational organizations to enhance education, trail signage, and other programming with an aim towards better recreational stewardship.

WATER QUALITY PROGRAM

Karen Dinicola, [phone number, email address]

Ecology’s Water Quality Program issues municipal stormwater National Pollution Discharge Elimination System (NPDES) permits to large (Phase I) and small to medium (Phase II) cities, counties, and non-traditional operators of municipal separate storm sewer systems (MS4s) in Washington State. Vision 2050 clearly sees these Clean Water Act permits as important foundational tools to support protection of aquatic resources under the long-range growth management, environmental, economic, and transportation strategy. Our permits build on the region’s current growth management strategy – focusing growth inside UGA boundaries – and we are just beginning to see positive results in improved stormwater management and resulting water quality protection.

The “Reset Urban Growth Alternative” is not consistent with our environmental protection goals. Under the NPDES permits and the State’s Growth Management Act (GMA), many communities in the PSRC counties are working to accommodate projected growth with minimal increases in impervious cover. Both “Stay the Course (No Action Alternative)” and the “Transit Focused Growth Alternative” support these efforts and are much more supportive of our environmental protection goals – with the “Transit Focused Growth Alternative” supporting the most aggressive approaches.

The EIS analysis led to a finding that the “Reset Urban Growth Alternative” would provide greater stormwater benefit from redevelopment retrofits than the “Transit Focused Growth Alternative.” We disagree with some of the assumptions made in the analysis and, more importantly, we disagree with the finding. We recognize that the authors had limited data available, and would like to provide more information for context and reinterpretation of the relative benefit comparison.

The statement on p. 134 that “in previously undeveloped areas, avoiding development altogether will result in less impact to water quality than new development compliant with current stormwater management codes” applies to redevelopment as well.

The sprawl that would be created by the “Reset Urban Growth Alternative” will result in more water quality impacts from clearing and grading than can be mitigated by site and subdivision application of required new development and redevelopment stormwater controls alone, even with all of the permit-mandated Best Management Practices (BMPs). King, Snohomish, and Pierce Counties recently completed watershed-scale stormwater plans that included detailed modeling to evaluate water quality impacts of various buildout scenarios in watersheds under development pressure. They consistently found that additional non-traditional stormwater management approaches beyond current NPDES permit requirements for managing stormwater will be needed to protect water quality in such watersheds. The MS4 permits are on schedule for reissuance on July 1, 2019, and the formal drafts proposed new planning requirements to make progress on this issue. However, the water quality impacts of sprawl would likely be even worse under the “Reset Urban Growth Alternative” in areas of all four counties outside Urban Growth Areas where the Phase II municipal stormwater NPDES permit requirements do not apply.

On the other hand, the transition from gray to green infrastructure across the Puget Sound region is just beginning to take off. As retrofits, these projects do not need to be driven by large traditional redevelopment projects to provide multiple stormwater benefits. Cities, Counties, and Conservation Districts are increasing strategic coordination of efforts to transform stormwater infrastructure on both public and private properties in areas of existing development with known water quality issues. They are installing permeable pavement, depaving parking areas, and replacing lawns and curbs with small new green infrastructure approaches that cumulatively improve water quality, provide urban habitat for birds and other wildlife, create aesthetically pleasing park-like spaces, and increase property values while not in themselves displacing residents.

Another redevelopment/retrofit project activity that was not included in the analyses was regional treatment facilities in areas with old infrastructure. These facilities are likely to be constructed in the existing urban core, not in rural areas, and provide substantial improvements

in water quality. Like the smaller green infrastructure projects listed above, these facilities serve as public amenities. Ecology is supporting design and construction of regional stormwater treatment facilities through our grants program.

We appreciate the EIS document's focus on social justice considerations. Local jurisdictions determine where the types of projects listed above are located, and they will likely appreciate PSRC's recommendations and future guidance for minimizing displacement effects. However, the smaller projects in particular are increasingly being focused where low-income communities and communities of color reside, and social science studies of these new green infrastructure approaches are showing promise in counteracting common problems these communities face.

These multiple benefits have not yet been cumulatively quantified in a way that could inform the EIS analyses, but we are working toward getting this type of information that should be helpful for the Vision 2060 updates.

Focusing growth inside the existing designated UGAs has curbed sprawl, protected terrestrial and aquatic habitat, and led to innovation in stormwater management approaches. Looking further ahead to 2070 when as many as 8 million people may live in the region, more aggressive growth management approaches may be needed to keep ahead of those growth pressures. With this in mind, we recommend the PSRC increase engagement with neighboring Puget Sound counties which are also expected to see tremendous population growth during this planning period, and from whom increasing numbers of people are traveling to the PSRC counties for work each day.

Thank you for considering these comments from Ecology. If you have any questions or would like to respond to these comments, please contact one of the commenters listed above or Meg Bommarito, Regional Planner, at [phone number, email address].

Sincerely,

Tracy Nishikawa

SEPA Coordinator

Sent by email: Erika Harris, eharris@psrc.org

VISION2050SEIS@psrc.org

ecc: Eva Barber, Ecology

Meg Bommarito, Ecology Karen Dinicola, Ecology Jean-Paul Huys, Ecology Maria Sandercock, Ecology Gail Sandlin, Ecology

Stacy Vynne McKinstry, Ecology

Commenter(s):

Department of Ecology, Eva Barber, Karen Dinicola, Jean-Paul Huys, Tracy Nishikawa, Maria Sandercock, Gail Sandlin, Stacy Vynne McKinstry

Washington State Department of Transportation

Communication ID: 354155

04/19/2019

April 17, 2019

VISION 2050 Draft SEIS Comment

Puget Sound Regional Council

1011 Western Avenue, Suite 500

Seattle, WA 98104

Dear Mr. Brown:

We appreciate the opportunity to review the VISION 2050 Draft Supplemental Environmental Impact Statement (SEIS). The draft SEIS reflects significant work to address the last decade of changes in the central Puget Sound. While the region has been a magnet for residential and job growth, this has led to displacement and economic hardship for many of the region's more vulnerable populations. Housing costs have forced residents to live further away from work, which contributes to longer commute times and increased pressure on our transportation system. These changes have influenced housing, commute, and travel patterns. As our agency and others respond to these growing issues, VISION 2050 provides an opportunity to plan in a way that makes the most of the planned and future transportation investments we'll see

over the next thirty years. The following comments were developed with this in mind and consideration by PSRC's Growth Management Policy Board.

WSDOT's preferred alternative

Of the three alternatives, WSDOT sees the Transit-Focused Growth Alternative as the best option to address the many challenges described above. By focusing 75 percent of the region's growth around its existing and long-term transit investments, this alternative provides a foundation to further integrate land use and transportation planning. Transit-Focused Growth better addresses the region's jobs-to-housing imbalance than the other alternatives, and shows the least growth occurring in rural and unincorporated areas where development patterns force reliance on single occupancy vehicles. Not surprisingly, this alternative provides the greatest support for transit-oriented development, which results in the highest transit usage, the largest number of jobs accessible by walking, biking, or transit, and shows the least environmental impact.

While the performance outcomes for the Transit-Focused Growth Alternative shows a step in the right direction, it also contributes to the highest potential risk of displacement for people of color and low-income communities. If this alternative is selected, we recommend robust policies and mitigation measures be adopted in VISION 2050 that proactively work to prevent displacement by providing affordable housing and transportation options for the affected communities.

WSDOT is least supportive of pursuing the Reset the Urban Growth Alternative. The Reset Alternative would result in more pressure (congestion) on our transportation system and environment, while providing the least access to jobs via biking, walking, and transit, including connections to ferry terminals.

Additional considerations

The following are areas that could benefit from additional work and/or clarification as the Growth Management Policy Board selects a preferred alternative:

Updated Centers Framework and Achieving the Regional Growth Strategy

The draft SEIS describes that the objective of the Regional Growth Strategy is to "...create and support centers to serve as concentrations of jobs, services, and other activities." However, the document doesn't indicate how much of the forecasted population growth is expected to occur in the designated centers under any of the alternatives.

It is important to distinguish between growth in centers (as opposed to growth in cities with centers) because centers are also intended to serve as transportation hubs whereas most city neighborhoods do not serve that function. PSRC's 2018 Regional Centers Framework update defined two new types of regional growth centers—Urban Growth Centers and Metro Growth Centers. It defines different roles and functions for these two types of centers and sets very different expectations for accommodating future growth for each. It's important to know how much growth will occur in each of these types of centers as opposed to other parts of the region, as it has implications for transportation planning and congestion mitigation.

The updated Regional Centers Framework calls for research to be conducted to provide guidelines for the number and distribution of the regional centers, an understanding of the competition for market shares, and projected growth. Having the results of this

work seems essential in updating the Regional Growth Strategy. We encourage further

analysis to identify the appropriate classification for each of the regional growth centers, and some analysis of the impact these would have on the success of the Transit-Focused Growth Alternative. For example, if all 29 regional growth centers were successful in meeting their new expectations for growth by PSRC, what share remains for the other regional geographies, such as the High Capacity Transit Communities?

Timing of High-Capacity Transit Investments, Growth, and Development

The Transit Focused Growth Alternative calls for 75 percent of the region's population and employment growth to occur within regional growth centers and within a quarter-mile to a half-mile from current and planned investments in high-capacity transit. This alternative uses the long-range high capacity transit network identified in the Regional Transportation Plan. Some of this network exists today and some of it is being implemented now, but much of it won't be completed until 2030 and beyond.

If new population and employment targets are adopted approximately every ten years, there will be approximately three cycles completed prior to 2050. The draft EIS does

not discuss the assumptions for how growth will be distributed over the 30 year horizon

to align with the transit investments coming online. For example, does the alternative assume that the High-Capacity Transit Communities (HT) receiving service sooner will grow at a faster rate than other areas in the earlier years of the planning horizon? Concentrating significant growth in the HT Communities decades before the investments are promised could have significant negative impacts on the regional transportation system.

The SEIS would be improved with a discussion of the assumption used in the analysis, including any discussion of the ways in which local population and employment target processes will be conducted in the years leading up to the planned transit investments opening for service.

Freight and warehousing trends

In general, WSDOT would like to see the SEIS further address current and future issues with freight mobility in the region as it relates to the shifting trends of e-commerce. As the population continues to increase, pressure will continue to be placed on the freight and port systems we have. Transportation patterns (including supply chain and personal trips) have already shifted in response to the popularity of e-commerce within the last decade. E-commerce has led to a boom in the warehousing industry and has

concentrated heavy truck traffic between warehouses and distribution centers. Simultaneously, this system reduces the amount of personal and truck trips to and from traditional shopping areas, while adding delivery vehicles to local roads. Although the effects of this trend are not fully understood, we suggest considering additional mitigation measures related to commercial truck parking needs and freight movement throughout the region, as they have a significant impact on the transportation system, economy, and environment. Please see the 2016 Truck Parking Study and the 2017

Freight Systems Plan for more information.

Mobility on Demand

In the past decade, we've seen more and more people turn to on-demand ridesharing services to replace their own car trips or connect to other modes. Although it may be difficult to forecast future ridership for these types of services, we understand there are still impacts to our transportation system. For example, if someone uses a rideshare service to reach a ferry terminal, there may be one less vehicle on board, but that trip can contribute to more congestion in the local street network and continued need for drop-off/pick-up zones.

In the future, we would like to work with PSRC and other partners to more accurately analyze the impacts of these on-demand services on our transportation system and determine policies that guide an equitable and integrated transportation network for all.

Technical comments

For your consideration, we have included a table with technical comments and the corresponding page numbers.

We appreciate the opportunity to comment on the Draft Supplemental Environmental Impact Statement for VISION 2050 and look forward to continuing our conversations about building a safe, equitable, and sustainable transportation system in the central Puget Sound. Please do not hesitate to reach out if you would like to discuss any of WSDOT's comments.

Sincerely,

RM:rm

Enclosure: WSDOT Technical Comments

cc: Patty Rubstello, WSDOT Marshall Elizer, WSDOT Robin Mayhew, WSDOT Mike Cotten, WSDOT John Wynands, WSDOT Kerri Woehler, WSDOT

WSDOT technical comments for the Vision 2050 draft SEIS April 15, 2019

Page number | Comment

|

Page # 35 | In the first paragraph, suggest this edit because Connecting Washington includes funding for more than state highways: "Connecting Washington state highway funding 1packageapprovedin 2015 and various local initiatives..." |

|

Page # 35 | Washington State Ferries has 23 vessels now. The WSF 2040 Long Range Plan calls for 16 new vessels by 2040 and it forecasts ridership to grow 30% by 2040. |

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Page # 36 | This document refers to the Long Term Air Transportation study completed in 2009. This is a legacy document that has been replaced by the Washington Aviation System Plancompletedin 2017.<https://www.wsdot.wa.gov/aviation/Planning/> |

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Page # 36 | Under Freight considering adding primary freight routes in Kitsap County,which are SR 3and SR 16. ' |

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Page # 36 | Intercity Passenger Rail Section: The information provided is out of date. The 20 American Recovery and Reinvestment Act (ARRA) projects referenced in the first bullet point have been completed. Later this year, WSDOT will start developing a new Service Development Plan that will identify the next round of rail projects to reduce travel times, increase reliability, and increase capacity for Amtrak Cascades between Portland and Vancouver, BC. |

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Page # 37 | Change Puget Sound Gateway Program paragraph. Instead of "relieve traffic congestion" say "manage congestion." |

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Page # 73 | The executive order 90-04 was rescinded, see:
[https://www.aogov.wa.gov/sites/default/files/xeorder/EO 15-04.pdf](https://www.aogov.wa.gov/sites/default/files/xeorder/EO%2015-04.pdf) |

|

Page # 73 | State laws and permits regarding archeological sites may be added, per RCW chapters 27.44 and 27.53. |

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Page # 107 | Under Urban Land: Increased density, infill, and redevelopment in urban areas adds pressure to convert industrial and freight-dependent areas such as ports, rail yards, truck parking, and warehousing. |

|

Page # 117 | Transportation impacts are only measured for personal travel. Freight movements are increasing faster than population growth and should be included in your analysis as they have a significant effect on the transportation system, economy, and environment. |

|

Page # 123 | First bullet states "Install new traffic signal systems or improve existing ones." WSDOT evaluates Intersection control- both traffic signals and roundabouts before recommending installation or improvement on state facilities. It may be better to keep the language more generic.

|

[Commenter\(s\):](#)
Washington State Department of Transportation, Roger Millar

Individual comments

[Alex Jones](#)

[Communication ID: 344253](#)

[03/11/2019](#)

Dear PSRC,

It is clear that as our region grows, we cannot permit additional unfettered growth into our unincorporated regions. You can read about it in your own document. Growth that is uncontrolled will result in the lost of habitat for many endangered animal species, water shed/runoff impacts from increased roads, more emissions from more driving/car oriented communities, more traffic for the same reason, etc, and a million and one more impacts you can read about in your own EIS. The only viable option to preserve the quality of life of the people who live here, sustainability is to turn the Puget

Sound into a more urbanized area. Now you could argue that "people generally want to live in Single Family Homes" and while that may be true, they also generally want to sniff cocaine out of a strippers ass, but we as a society don't try to accommodate that, never mind encourage it like we do Single Family Home living via high way subsidization.

Please make the right choice and select the urban hub focused option.

Best regards,

Alex jones

Commenter(s):

Alex Jones

Alex Tsimerman

Communication ID: 354375

04/04/2019

Alex Tsimerman provided the following public comment at the April 4 Growth Management Policy Board.

Sieg Heil, my fuhrer. Guys, my name Alex Tsimerman, so I want to speak about what you talk right now. And I give you classic example of what has happened. Today in Bertha Room in city hall Seattle, Bertha Room, approximately 300 people, mayors, everybody who represents Sound Transit, ex-Governor Gregory, and all speaking about only one concentration, about transportation. So what I want to explain to you as the meeting will go all day. So all elite, all top level come and will be talking about transportation. Guys, what surprises me is this makes me absolutely sick because I don't understand it. No one from these 300, not yours, 300, no one stand up and officially talk, stand up and officially talk. I am against transportation Ponzi scams. No one, guys, you understand what is you did, you bring something what is absolutely identical what did before German Nazi Soviet communist. You reject everybody who have fundamental different opinion. Yeah we can talk about chair left, chair right, street here, street here, but no one publicly and I go to Sound Transit, to you, to everybody and I never see one talking. Guys stop this mafia principal, this Ponzi scam for \$100,000,000,000. No one. How is this possible. How is this possible. It is possible for one particular reason. And I told you many times before, you are more dangerous than Nazis or communists because they did use(?) a constitution. You in America, in Seattle, in State Washington did something what is very unique, it is pure fascism.

Commenter(s):

Alex Tsimerman

Alexander Thomson

Communication ID: 350071

04/02/2019

I fully support the transit focused growth strategy. The impact to ecosystems, the reduced carbon footprint are both major reasons why I support this path forward.

Commenter(s):

Alexander Thomson

Alice Lockhart

Communication ID: 354372

04/25/2019

I am stunned that none of the three alternatives undertakes a meaningful reduction in green house gas (GHG) emissions. Please provide a third alternative that takes into account the IPPC's conclusion that we have only 12 years (11 remaining now) to drastically curtail GHGs (<https://www.ipcc.ch/sr15/chapter/summary-for-policy-makers/>). Please write a fourth alternative in which GHG reduction is the primary consideration in all policy, from where growth will occur (in the urban core, near transit), where it should NOT occur (farm land and forest, for reasons of food stability as parts of our farmland suffer saltwater incursion and California suffers desertification, and carbon sequestration), to the transportation choices we must make now to curtail GHG emissions that result from transportation in our region. Every policy has a GHG component, and for each, the minimum GHG emission possible should be chosen. Also brand new policies to create welcoming, walkable, transit-rich cities, surrounded by carbon-sequestering farm and forest are imperative if our kids are to have a livable future.

Commenter(s):

Alice Lockhart

Andrew Sang

Communication ID: 346825

03/25/2019

Dear PSRC,

I would like to lodge support for the Transit Focused Growth alternative. Your own EIS claims it has the best outcomes with respect to housing, transportation, and equity. The fact of the matter is, the single family housing paradigm is not sustainable economically or ecologically. The amount of land that Single Family Homes waste, the amount of municipal services they need (such as roads/highways, utilities, etc), and the amount of ecological damage they cause in the form of increased emissions from additional driving (because transit isn't feasible), increased distance to farms necessitating more transportation infrastructure, and damage to watersheds/habitats simply does not merit the comparatively tiny amount of property tax they bring in when looked at next to apartments or other land uses.

All that being said, if at all possible, I believe that there should be a "super" version of the transit focused growth as an alternative, acting as a wholesale moratorium on new greenfield "sprawl style"

development and a much greater focus on additional high density MFH built near HCT and in Seattle. There exists no reason at all to continue perpetuating auto oriented development. You may say “people want to own a single family home” but sometimes people want things they cannot have, if it comes to the detriment of society at large. It is incumbent upon the PSRC to tell people “you cannot have this” if what they want will contribute heavily to housing unaffordability, carbon emissions, environmental degradation, and increased automobile reliance/traffic. To build wealth, folks should be putting their money into stocks anyways rather than the housing market, where every single dollar of “returns” falls upon the next generation as a “cost” of housing. If a “super” transit focused growth alternative is not possible, I believe that the PSRC should work with relevant local authorities to enact some sort of a high “urban sprawl excise tax” to heavily disincentive the development of additional greenfield sprawl. Additionally, areas such as Kent and Woodinville should cease developing additional single family homes, and focus on industrial, working class jobs accessible to middle class people.

Please do the right thing, and stop urban sprawl.

Best regards,

Andrew Sang

UW Planning Student

[Commenter\(s\):](#)

Andrew Sang

[Ann Stevens](#)

Communication ID: 354565

04/29/2019

Increase density in currently developed areas. Reduce the allowed ground coverage for buildings on lots to protect trees. We can have smaller houses and this will not decrease density and it will protect trees and green space. Protect current open spaces from development. Do not increase areas where growth allowed.

[Commenter\(s\):](#)

Ann Stevens

[Barbars Joyner](#)

Communication ID: 354338

04/25/2019

Legislation is needed to enforce responsible design criteria on new towers downtown. Density will only succeed if it preserves a safe, functioning and healthy environment for existing and future residential neighbors and people working downtown.

Seattle needs density but not without limits. Nearly a dozen towers pending approval are being passed without addressing public concerns on their site-specific impacts.

If towers aren't designed to fit individual site conditions, existing buildings, city streets and the environment will be the losers. There's only one chance to get this right before downtown Seattle is irrevocably reshaped for generations to come.-

Commenter(s):

Barbars Joyner

Blake Wedekind

Communication ID: 353513

04/13/2019

The transit focused option makes the most sense to me. Let's prioritize sustainable transportation options and walkable cities, and make the most out of our light rail investment. I do believe this will improve the quality of people's lives that live in the transit growth areas. Thank you!

Commenter(s):

Blake Wedekind

Brad Book

Communication ID: 348740

03/28/2019

Transit focused growth makes the best sense. It provides less impact on the environment and will help minimize transportation impacts. Focusing growth near transit channels (including light rail) will provide improved efficiency for infrastructure, construction development and less impact on existing communities that would be affected by urban sprawl. A focus toward protecting our natural resources is essential in preserving the charm of our area.

Commenter(s):

Brad Book

Bryan Weinstein

Communication ID: 349542

03/31/2019

Reset growth - NO - this alternative is in violation of the Growth Management Act which attempts to corral growth into the places where we have decided it should go in the first place. Sprawl is not the answer. Transit based - this only works when there is equity placed on all participants including

businesses; right now individuals are paying the highest prices for transit and many of us can no longer afford to live in our neighborhoods because of skyrocketing property values, taxes and the taxes placed on vehicles and most of us can't wait another 20 years for light rail - we will be dead by then! The only alternative seems to be "stay the course" and this is also poor - most cities have done an awful job of "managing" their growth, the housing crisis is here and there are so few affordable housing alternatives available - the majority of these homes seem to be for tech people and they alone do not make up the economy. If Microsoft or Boeing, Amazon or any other of these tech firms left, there would still be thousands of people here working regular jobs that also need housing. I would say, "stay the course" but make some thoughtful and immediate refinements to accommodate the growth that is happening now and will happen in the future, as well as start thinking about the longer term, "where is light rail going to land" in some of the cities (like Issaquah) that have done nothing in this regard.

Commenter(s):

Bryan Weinstein

Carolyn Hollack

Communication ID: 354256

04/24/2019

Recommend you research the future of work and the impact it has on assumptions in this study regarding commute time. Additionally the impact of blocking more light has been proven dangerous for health (there are experts at University of Washington in this area), so the general impacts hidden in your study under "Visual Quality" need to be called out as health impacts, not visual.

Commenter(s):

Carolyn Hollack

Carreen Rubenkonig

Communication ID: 349679

03/15/2019

The three alternatives: Transit Focused Growth provides the best impact for the environment and intensifies the use of existung services to serve those who can benefit

Potential impacts and benefits: Please format a response for lifestyle categories - simply: children/families/retired/single adults (use whatever categories already exist. I'd like to read how each 2050 Growth Alternative provides options for each 'lifestyle' category.

Criteria for selecting a preferred alternative: Could "livability" standards be applied for lifestyle categories for each of the three 2050 Growth Alternatives. Consider using: walkability/affordable housing/transit availability/access to jobs/integrated communities/access to services, etc.

Commenter(s):

Carter Burns

Communication ID: 354683

04/29/2019

I guess my comment would be to stay the course, but even that is poor option given the rampant growth going on all around south Sno County. I definitely do not support growth of mass transit into the area especially in the Clearview community. I believe that supporting the preservation of truly rural areas with NO high density multi-level dwelling or other structures is important to Snohomish County and the well being of the public in general. Minimum lot sizes should be no less than 1 acre in my opinion in these rural areas. High density community plans should be avoided, especially if road/highway capacity is not available. Commercial zoning should be restricted, and allowed only as needed to support the communities in the area.

Commenter(s):

Carter Burns

Cary Westerbeck

Communication ID: 347677

03/21/2019

I'd prefer to see the transit focused growth, by far. I believe we need to return to compact, walkable, pedestrian-friendly cities and business districts dispersed throughout core cities. I also think halting climate change is critical and the "TFG" approach does this best. I'd also like to see a dramatic halt to auto-oriented development. We need to be able to go about our days and needs without a car as prosthetic device. We also need greatly expanded housing choices throughout single family zones (banish exclusionary s.f. only zoning) allowing for "missing middle" housing everywhere and a repeal of all minimum on-site parking requirements asap in all cities and counties.

Commenter(s):

Cary Westerbeck

Chris Philips

Communication ID: 348570

03/27/2019

This is a pointless exercise. Those of us paying attention already know that the regional leadership will do what it likes regardless of input from the citizens. That said, the solution to growth is to enable construction:

Approve high-rise downtown living with ample parking and efficient mass transit. Stop penalizing developers, who must pass the penalties on to buyers, which creates \$500k studio apartments, forcing even upper-middle-income family-wage earners out to the suburbs.

Speaking of suburbs, stop choking our regional single-occupancy roads. BUILD MORE LANES. Not bike lanes, HOV lanes or transit lanes- honest-to-God single-occupancy and truck transit lanes. Yes, more roads, more freeways, even if the bugs and bunnies crowd don't like it. Haven't any of you people been outside of North America?

Stop- STOP- pretending you can "solve" global warming. Even assuming man is causing the problem (he's not) there's no way anything you do in Puget Sound will counteract what the rest of the world is doing. Why are you punishing me because some factory in Shenzhen is burning coal?

The way to manage growth in Puget Sound is to allow it. It's not rocket science, unless, of course, you're a regional planner.

PS: Proof of how imbecilic you people are: I'm required to prove I'm human in order to comment. How important do you think you are?

Commenter(s):

Chris Philips

Christine Coyle

Communication ID: 354662

04/29/2019

In my opinion, growth should be limited to Transit Focused Growth in order to serve the most people and allow for growth, meanwhile preventing sprawl and conserving the rural environment. I am completely against resetting urban growth area which leads to sprawl, congestion, and strains the environment. There are countless credible studies showing the detrimental impact of urban sprawl and this is the opportunity to prevent it here.

Thankyou

Commenter(s):

Christine Coyle

Cliff Hanks

Communication ID: 344115

03/09/2019

I do not like the Urban Reset Growth option. It makes more sense to increase growth in cities and areas served by transit.

Commenter(s):

Cliff Hanks

Connie Combs

Communication ID: 343334

03/01/2019

Thank you for providing an opportunity to comment on the SEIS for VISION 2050. My comments pertain to Appendix H: Equity Analysis.

Page H-5 mentions that the population of people of color is growing rapidly, indicating there is an increased need to ensure that PSRC's VISION 2050 addresses regional racial disparities in housing, health, education, wealth (etc.). This means there is a need for VISION 2050 to include goals and strategies for ending racial disparities.

2. VISION 2050 does not have enough focus on ending racial disparities, and does not mention, or define racial equity. At the very least, a shared definition of "equity" would greatly improve the ability of jurisdictions to translate the PSRC equity analysis into something useful for their work. I have suggested previously that a simple definition for equity would relate to non-disparate outcomes. If you've done racial equity work correctly, you would end the disparate outcomes by race. Racial equity work is in the interest of eliminating disparities by race.

3. Appendix H mentions increasing "access" several times. Access, Inclusion and Equity, are all very separate, and all very necessary. If VISION 2050 focuses only on access, it will fail to include marginalized and minoritized communities, and will be unable to achieve racially equitable outcomes.

4. By emphasizing the role of "access" and leaving out discussion of racial equity, VISION 2050 risks perpetuating the racial disparities of the Puget Sound Region. Research such as Richard Rothstien's book, *The Color of Law*, show us that racial disparities in housing (and likely other areas, though the book focuses primarily on housing) are not a phenomenon resulting solely from individual "bad actors", but rather from systematic exclusion and discrimination championed by all levels of government. Such research shows us that the government has a legal obligation to repair those harms. PSRC's draft of VISION 2050 is currently an example of a governing body failing to recognize the causes, and address, racial disparities.

Thank you for considering my comments as you endeavor to improve the lives of residents and visitors of the Puget Sound Region.

Commenter(s):

Connie Combs

Dan Wallace

Communication ID: 354676

04/29/2019

As a Seattle Realtor since 1977, I am for the 'Reset Urban Growth' alternative. Seattle has been slaughtered with people, construction and growth since the year 2000 and housing costs reflect the demand for 'close-in' housing. Growth in other (unincorporated) areas would take some of the burden off the city of Seattle and create jobs in outlying areas where housing is more affordable and land is more plentiful. Citizens would be more likely to live in the areas they work as opposed to many Seattle workers who now have a long commute everyday because they cannot afford to live in an urban area with sky high housing prices.

Dan Wallace

Commenter(s):

Dan Wallace

Daniel Salinas

Communication ID: 354639

04/29/2019

My preference would be transit based growth to maintain focus of the available tax dollars to achieve maximum benefit. Staying the course hasn't worked, is underfunded and we are left with a large amount of unfinished roadways and development that is happening without infrastructure to support it. It is always easy to build on new ground and takes more talent to reform the structure of our towns and cities into ones that meet the new demands. Resetting urban growth runs a huge risk of burying our greatest asset, the reason people move to this area; its natural beauty. We have seen greater damage to our environment by untamed development that moved well ahead of infrastructure while endangering wetlands, critical habit forests and waterways. It also puts greater pressure on emergency resources, maintenance and monitoring that haven't the funding to keep up with the growth. Keeping it to the transit centers allows for growth where people need it most and where resources are already established. I live in Cathcart and have seen the irresponsibility of the current plan that left both HiWays 9 and 522 unfinished creating bottlenecks to those living out this way. In closing: Option 1 "Stay the Course" is a big NO, it is a failure; Option 2 "Transit Focused Growth" gives us the best option for the environment and economy and is a YES for me; Option 3 "Resetting Urban Growth" is a NO as it creates to many costly issues and environmental concerns.

Commenter(s):

Daniel Salinas

David Hancock

Communication ID: 348616

03/27/2019

I strongly support the Transit-Focused Growth alternative. I also strongly support the push for thorough a racial equity analysis that a coalition of organizations including Puget Sound Sage, Futurewise, and Transportation Choices Coalition are spearheading.

Commenter(s):

David Hancock

Derek Young

Communication ID: 354748

04/29/2019

April 29th, 2019

Mr. Josh Brown

Executive Director

Puget Sound Regional Council

1011 Western Avenue, Suite 500

Seattle, WA 98104-1035

Re: Vision 2050 DSEIS Comments

Dear Mr. Brown:

Thank you for the opportunity to comment on the Vision 2050 Supplemental Environmental Impact Statement (SEIS). I want to make clear from the outset that unlike my role representing Pierce County on the Growth Management Policy Board (GMPB), I am commenting here on behalf of only myself.

I would also like to thank the excellent work by Puget Sound Regional Council (PSRC) staff preparing the SEIS and working with the GMPB throughout this process.

Preferred Alternative

Staff's analysis makes clear that the Transit Focused Growth Alternative aligns with our stated objectives in favor of protecting rural working and wildlands, Puget Sound recovery, building healthy and sustainable communities, while decreasing greenhouse gas emissions and commute times.

That said, I agree with the comments made by the Council Chair and Executive on behalf of Pierce County that there is concern about this alternative's consistency with what we know about vested development rights and buildable lots in the rural and unincorporated urban growth area.

If we treat those targets on the upper bound as guidance rather than a rule that could result in compliance problems for our comprehensive plan, there should be no issue. However, we can reduce market demand being pushed to outlying areas by setting firm minimum density requirements around High Capacity Transit (HCT).

Jobs-Housing Balance

I do appreciate the extra attention paid by staff and the GMPB to the issue of Jobs-Housing Balance. Though Vision 2040 anticipated a multipolar economic development model with jobs and housing growth throughout the region, I would expect everyone can agree that we've failed to deliver on that promise.

The jobs-housing index utilized by staff (see Figure 4.1-1) shows each alternative anticipates imbalance throughout the region. This appears to be due to staff accepting growth forecasts from the State's Office of Financial Management. I believe this is backwards. Our plan for where to distribute that growth in the region is a matter of policy. We should have a Transit Focused Growth (B) alternative that starts with an index of 1.0 in each subarea, and work backwards from there.

While the market will gravitate to demand, housing prices are a tool we can use to show where it is constrained by land use policy. Right now it's signaling very strongly that there is unmet demand for housing in areas that have experienced the most significant amount of job growth, specifically in "Sea-Shore" and "East King" subareas. This constraint displaces those unable to compete with higher salaries and are forced to commute ever further away into parts of the region that have benefitted least from the economic growth experienced in King County. Our regional plan should counter, rather than exacerbate this inequity including consideration of policies that promote job creation outside the subareas with the highest jobs-housing index to help address the existing imbalance.

Further, if those housing demands are not addressed, and the jobs-housing imbalance accepted and even anticipated within Vision 2050, then our regional growth strategy is internally inconsistent with the goals stated within the plan. Without jobs-housing balance throughout the region we will encourage more growth away from transportation infrastructure and into smaller communities and rural areas increasing CO2 emissions, stormwater pollution, reducing habitat and open space, while displacing lower-income people least prepared to handle additional transportation costs.

It's difficult to think of a major social problem we have in our region unrelated to the concentration of employment and wealth in jurisdictions unwilling to allow for enough housing to accommodate that economic growth. Increased homelessness, transportation costs, impacts to health, and even time spent away from communities and families are all harmed by the jobs-housing imbalance.

We need to think about housing the same way we do roads and transit — as infrastructure for jobs.

We must establish a standard ensuring that each county plan for enough housing to accommodate job growth projections, otherwise I don't understand the purpose of having a regional growth strategy or multicounty planning policies at all. It's the most important reason for doing the work. I would further recommend that we consider using the subregions identified in the jobs-housing balance section.

Unincorporated geographies

I appreciate the attempt to develop some nuance within the unincorporated area by allowing for designation as High Capacity Transit Communities. However, this still leaves ambiguity for the remain areas. Allowing for designation by community planning area, similar to our cities, would be a more logical way to differentiate unincorporated areas from each other.

For example, the UGA surrounding the City of Gig Harbor and planned for annexation there is generally similar in development pattern and zoning to the City as a small outlying community surrounded by rural area. Meanwhile, South Hill, adjacent to and similar in zoning and development to Puyallup designated as a Core City, would have the same geography assigned to it as the Gig Harbor UGA.

Health Impact Assessment

As we've become more aware of the public health benefits of smart planning policies, it's essential to include a Health Impact Assessment in our environmental analysis. HIA's are recommended as potential mitigation within the draft SEIS (see Table 4.9-1). This request probably should have been made during EIS scoping, but since this is an EIS for a public plan rather than a private development, I thought it was worth making. I'm sure our public health departments could assist PSRC staff in developing an HIA.

Conclusion

Thank you again for the opportunity to comment. Based on discussions at the GMPB I think we've all recognized, to one degree or another, the issues and concerns I've tried to address here. I hope these comments help move the process forward in a productive manner and, as always, I'm available to discuss them in greater detail at any time.

Sincerely,

Derek Young

Pierce County Councilmember

Commenter(s):

Derek Young

Elaine Nonneman

Communication ID: 353941

04/18/2019

Has information on Vision 2015 and the draft and final SEIS been mailed to households and businesses in all targeted communities and in various common languages? A failure of the MHA process was assuming people would happen to find the information online, and waiting until nearly the end of the comment period for the EIS to supply information about it in multiple languages. The intent was clearly to exclude people most impacted by displacement.

Commenter(s):

Elaine Nonneman

Grady Helseth

Communication ID: 354779

04/29/2019

Alternative 2 was adopted by the County Council. It puts most growth in the existing cities, especially Everett and Lynnwood. Please do not allow the Seattle Master Builders extend the SWUGA any further east. This will endanger Little Bear Creek and turn Highway 9 into a Highway 99 nightmare with commercial development and even more traffic. Please leave the rural areas rural. And STOP letting the schools and churches purchase land on the edge of the UGA and even into rural areas. It creates huge traffic problems down the line as can already be seen on 43rd Avenue SE east of Mill Creek.

Commenter(s):

Grady Helseth

Gurvinder Singh

Communication ID: 354677

04/29/2019

Hello-

I live in the Ravenna neighborhood and am excited about the light link rail opening up in UW and Roosevelt in the coming 2 years. However we do not have a good connection from metro to the light rail station at UW stadium, but I heard a possible route 327 being considered to connect the future UW and or Roosevelt station. Please count me as a big supporter for this connector route.

Thank you.

Gurvinder Singh

Ravenna neighborhood

Commenter(s):

Gurvinder Singh

Heather Bruce

Communication ID: 354633

04/29/2019

My preference would be to either stay the course or focus on Transit areas. Please do NOT reset the urban growth areas into the rural zoning. If there MUST be a rural reset, PLEASE KEEP THE RURAL RESET TO NO LESS THAN 1 ACRE LOTS. 1 acre lots retains space for families to have gardens and some small

livestock, while still allowing some increase in density. Old fashioned neighborhoods breed healthier people. In addition, there are issues with wildlife habitat and watersheds in the rural zoning, that should not be ignored.

Consider and implement ALTERNATIVE and INNOVATIVE housing solutions, like tiny houses, easier to permit ADU's, CLUSTER HOUSING and other sorts of solutions that utilize existing infrastructure. Preserve quality of life not just expanding businesses. If your ideas don't say: Pleasant, Comfortable, Welcoming, Homey, Friendly, Charming, Safe and Sustainable, steer clear of them!

Please remember your existing property owners and tax papers and insure quality of life....we are trusting you to represent the CITIZENS of Snohomish County FIRST and businesses second. Thank you for your efforts to attain GMA goals while respecting the citizens of Snohomish County.

Heather Bruce

Clearview resident of 32 years

[Commenter\(s\):](#)

Heather Bruce

[Heather Porter](#)

[Communication ID: 354680](#)

[04/29/2019](#)

Alternatives - Stay the course. Things are great as is.

[Commenter\(s\):](#)

Heather Porter

[Hendrick Haynes](#)

[Communication ID: 354152](#)

[04/22/2019](#)

2.8 Water Quality and Hydrology (pp. 48-53)

For pages 48-53, and looking back to page 46, bottom paragraph, work by the GMVUAC in enforcing a zoning lowering and blocking of the making of a Maple Valley Asphalt Facility on the old Indian Coal Mine site is an effort to promote wildlife and endangered species recovery, promote "rural character", and engage "Climate Change" issues inside of page 47, bottom paragraph, "connected network of habitats for wildlife to move through as conditions change". This work also is consistent with page 48 at 2.8 "Water Quality and Hydrology", in terms of working to safeguard the Cedar River Aquifer and river system (see also 2.9.2 "Water Supply Considerations" and page 55, top paragraph., "to deal with growth

and uncertainty"). Sadly, much water is mismanaged and wasted. On page 48, under 2.8.1 "Impervious Surfaces", the closing sentence should read "and improvements to storm water management, including emphasizing conservation of water flows and redirection or repurposing of waterflows to wetland and wildlife basins promoting water resources recycling, cleaning, the recharging of the aquifer, and for natural areas, parks, and/or recreation purposes.". Currently, a very high percentage of impervious surface area run-off is piped away and discharged quickly into corridors which flow quickly to the sea and supply little wildlife opportunity. Also, there are conflicting use pressures along critical water supply corridors, such as (as an area example) the location of various kinds of vegetation removing and impervious surface area creating industries along the Cedar River Canyon corridor.

2.9 Public Services & Utilities (pp. 54-55)

2.10 Parks & Recreation (pp. 56-61)

2.10 "Parks and Recreation", 2.10.1 "Existing Open Space Resources", and 2.10.2 "Park and Open Space" (pg. 56), and its operation to encourage wildlife and areas connectivity to nature, and to quiet the human mind and soul. On page 56 in the green bar, what "quality of life" is needs to be defined. Otherwise, it could be made out as anything and taken for granted attributes (in the "bundle of sticks") can be taken wholesale away. This idea or ideal should be often upgraded and reached for as a human and natural (including wildlife) experience, as this provides aesthetic guidance as to how designers may elevate and broaden the sharing of what is most important in the human and "Gaia" (earth) condition. While 2.10.4 "Access to Wild Open Spaces" complains about the need to have a car to access these spaces, no mention is made of the clubs, groups, car pools, and other alternatives that are available for this and have been so for many decades (one example: THE MOUNTAINEERS, which is only a phone call away; also one can form a group and each chips in a few bucks to buy a club car (and resources), and they can use that for hiking events). Closing line here should encourage networking themes specific to open public meeting areas, such as local library resources, and planning for group outings, which may be open to everyone. VISION 2050 should promote formations of such groups using community resources that are currently open and available.

2.11 Environmental Health (pp. 61-64)

Recognize what makes human beings innovate and be productive, and encourage these surroundings and processes. There is a great deal of literature on this, and in examples with both in rural settings and in corporate research and development campuses. In Section 2.11.2 "Human Health", it is noted that "there is potential to exacerbate localized air quality and noise impacts, and to adversely impact environmental health (see Section 4.4 and Section 4.14 for additional details)". Impacts such as "obesity, diabetes, heart disease, and stroke mortalities" can be significantly affected by noise (and other stress causing effects), and truck and vehicle emissions, and these impacts as called out in the references of 2) above (many scientific papers representing only a very shallow sampling of the research done). See C) above. These adverse health impacts reduce productivity, drive up health care costs, reduce fertility, drive up education costs, and impair regional development.

Start-up and maturing enterprise solutions would want to improve productivity and drive down health care costs, so they would leave or avoid areas that would have burdensome health care costs and lower productivity in favor of areas with reduced or negligible health care costs and improved worker productivity (which includes themselves; to do otherwise would not be competitive and put them out of

business). Enterprises which save money by polluting (and drive these savings onto their bottom line) increase the cost of business and lower the odds of success of others, and can produce a negative economic load on the community far in excess of the short term gains they may receive. In reference 2) above, there is at least one technical paper on this (many available on internet).

2.12 Energy (pp. 64-65)

2.13 Historic, Cultural, & Archeological Resources (pp. 66-67)

In 2.13 "Historic, Cultural, and Archeological Resources", which includes "buildings, bridges, and sites", as well as "beliefs, customs and practices", and sites can include "villages, camps, food gathering, and other seasonal activity sites beginning about 11,000 years ago." (2.13 at 3rd para.). As an example, the Indian Coal Mine site and related postal location is one such possibly eligible site, and is on "shorelines and watercourses" (see ref. 2) above). The last sentence in that paragraph should read ".... are often in areas with high rates of development and redevelopment activities. These site historical resources must be allowed to be reconstructed or otherwise memorialized in the construction activities or design of later development (including the creation of structures offering honor or tribute), which may include provisions for a historical timeline content embracing changing culture(s)". Note that the Indian Coal Mine near SR-169 and 196th Ave. SE is not indicated on Figure 2.13-1 "Historical Sites" (mine was once best producing in Western Washington, and also Indians used to camp along the Cedar River, and hunt and fish; and Indians also lived along the river and had children (see Martha George in ref. 1) above). Cultural themes should be maintained to encourage a sense of stability and heritage.

2.14 Visual Quality (p. 68)

"2.14 Visual Quality" should be re-titled to say Visual Quality" uses term "Aesthetic Resources" without crafting any long term purpose or vision within this "beauty" or human sensibilities related term. The title of this document is VISION 2050. What guidance are they giving us as to what PURPOSE(S) they wish to visually encourage, express, and "sell"?

VISION 2050 promotes a future condition. How may "Visual Quality" be mission purposed and used to promote VISION 2050?

What visual themes and cues should be encouraged, brought forward, repeated, studied, enhanced, and elevated? How may this "Visual Quality" term be tied into other elements within the "Aesthetic" human condition and experience (which includes all five senses, there depth of perception in memories, sense of history and culture, and sense of opportunity in promoting a welcoming future). See below.

"VISION 2040 FEIS that alter the visual environment persist today." does not offer any sense of mission or tests against some benchmark(s), nor does it suggest what may be done to improve meeting goals (if any) presented in VISION 2050. This chapter is followed by "EARTH". No tying is made between "VISUAL QUALITY" (the ideas of aesthetics and art) as it relates to the seemingly archaic or past uses of expression as "learning or science" (AMERICAN COLLEGE DICTIONARY, by Random House c. 1967 Library of Congress catalog number 67-16082; "art" def. 10 (pg. 70); see Gr. "ars", "artis" (art), "aro" (to join or fit)), which (of course) embraces earth and nature. This baits the question as to how VISION 2050 participants "Visual Quality" themes may contribute to uplifting the human condition through "learning or science" (a definition with a deep and rich reach through history), and support view of "production or expression of what is beautiful, appealing, or of more than ordinary significance." (Ibid., Random House,

pg. 70 "art", def. 1), where "beautiful" is "delighting the eye; admirable to the taste or the mind." (Ibid., Random House, "beautiful" def. 1, pg. 108); and "beauty" is 1. that quality of any object of sense or thought whereby it excites an admiring pleasure; qualification of a higher order for delighting an admiring pleasure; qualification of a higher order of delighting the eye or the aesthetic, intellectual, or moral sense.". This definition of "art" also includes "1. Skill in performance, acquired by experience, study, or observation; knack. 2. Human contrivance or ingenuity, as in adapting natural things to mans uses." (Webster's Collegiate Dictionary, Fifth Edition, c. 1936; 1944 ed., pg. 60), which embraces and celebrates nature. Some examples of embracing nature (in a rural context), is the creation and operation of farms, in the making and managing of forests and parks and natural areas (or spaces), and in the balanced practices of fishing and fisheries practices (and also as is found in sustainable aquaculture). While visually these scenes may seem to be easily interpreted, present themselves as satisfying expansive, and be visually satisfying, the underlying culture and science(s) that must be practiced (for sustainability) is deeply tied to a long history of discovery and practice.

Compare this under which entomological observers also cite the word "art" to mean "the employing of means to accomplish some end; opposed to nature" (LIBRARY OF UNIVERSAL KNOWLEDGE including THE CONSOLIDATED-WEBSTER COMPREHNSIVE DICTIONARY...", by Book Production Industries, Inc. (c. 1954), pg. 42, approx. at def.'s 2 and 3).

In embracing "aesthetic" principles, hopefully the idea of "art" may be to embrace "3. Any system of rules and principles that facilitates skilled human accomplishment; also, the application of these rules and principles: the mariners art." (The Reader's Digest Great Encyclopedic Dictionary, including Funk & Wagnalls Standard College Dictionary, The Readers Digest (NY) (c. 1967), Lib. of Cong. # 66-21606; pg. 82). In using the aforementioned example, in the mariners art, one learns to work with the seas and efficiently use its forces to take them where they want to go. Example: Being a global voyaging sailor (e.g., working against (rather than with) the tides, winds, and seas quickly limits or denies ones progress).

I am enlarging on the above by adding a new seemingly all embracing idea called "Aesthetics", or as defined in relation to philosophy, the "science which deduces from nature and taste the rules and principles of art." (American College Dictionary (Random House (NY) 1967, Lib. Cong. Cat. #67-16082), pg. 21); and "the theory of fine arts and of peoples responses to them; the science or that branch of philosophy which deals with the beautiful; the doctrines of taste.", and "Aesthophysiology", "the physiology of sensation and of the organs of sense." (Webster's New Universal Unabridged Dictionary, Deluxe Second Edition, c. 1983, ISBN 0-671-41819-X; Lib. Cong. #83-42537; pg. 31). Per above, "Art" refers to "learning or science" (Archaic.) and "the production or expression of what is beautiful, appealing, or of more than ordinary significance." (American College Dictionary (above) at page 70); e.g., the human experience in terms of nature and their environment as it involves all their senses, their depth of memories, and their inter-relationship within their culture and environment. The idea of nature being separated from "environment" seems a conditional and potentially harmful one; e.g., with environment being defined as "the aggregate of surrounding things, conditions, or influences" (Am. Col. Dict. (Ibid.) pg. 402), and by this definition can become and be accepted as a surroundings and/or force which may become and be sustained as something very much against and toxic to the force(s) of nature which sustains us on this planet, and within this universe.

Where "art and science" may be offered (by some) as being apposing entities, the definition of "science" is "1. Any department of knowledge in which the results of investigation have been logically arranged and systematized in the form of hypothesis and general laws subject to verification." (rising from L. scientia < sciens, -entis, ppr of scire to know; Ibid. The Readers Digest Great "science": pg. 1202).

Thus, art and science are joined at the hip and are servants to those who use it for their purposes (see U. S. Const. Art. 1, Sec. 8, Cl. 8 and use of terms "Progress of Science and useful Arts", which presumable has a term "useful" which differentiates it from that which is the opposite, or may fall progressively into some notion of being considered "useless", or perhaps is or may be (or cause something to be) non-productive).

We can see how the great cultures in history have expressed this idea by viewing the celebration(s) of forms outside of and within their great surviving monuments, spaces, and other accomplishments; and in studying their Anthropology and Archeology (and the reasons for and against their success(s)). No greater example exists for the use of "Aesthetics" to promote the rise and preservation of cultural objectives than in the study of ancient Greeks and Romans (their language, culture, accomplishments, and artifacts), as much material has been created, uncovered, and preserved.

On page 68 at 2.14 "Visual Quality", on page 152, 4.12 "Visual Quality", on page 152 Table 4.12-1 Potential Mitigation Measures: Visual Quality: this "Visual Quality" term as presented is not only too limiting, but also de-limiting (e.g., as used can produce a removal of "limiting floors" and produce a downward spiral in both the short term and long term expressions of the human experiences and/or discovery/creation/use/abuse of the environment). The table itself contains many good points focused only on a "Visual" approach. It seems dangerous as it is not embody the "Human Experience" as it is integrated with the other senses. An example of this may be taking a much loved and appreciated companion on a late springtime sunset horse drawn carriage ride along City of New York's Central Park. on Central Park West Drive past "The Lake", then up W. 77th Street to enjoy a fine meal at the Scalletta Ristorante (Incorporated), then by waiting carriage find their way along Center Drive and W. 57th St. to return to a grandly lit entrance opening to ones luxury suite at Trump Tower on 5th Avenue. This grand experience goes far beyond "Visual" and reaches into the depth and breadth of one's appreciation of all their human senses. and the magic of appreciating each shared moment.

A more appropriate main term would be "Aesthetics", or "Aesthetics Quality(s)", which relates to the entirety of the human senses, perceptions, and relational interpretations (see definitions above). "Aesthetic Resources" term in on page 68 (2.14 Visual Quality in green bar) should be replaced with "Visual Aesthetic Resources" (to be more specific), although "Natures Resources" or "Natural Resources" should be used where natures themes are promoted (as is done in many places, such as sculptures, wall papers and tapestries, panoramic paintings, sculptures (hero's on horses, etc.), etc.), for in exploring issues of sensory extremes (and "what is art", what is "beauty", etc.), one may run into conflicts with what cultures may assume as appropriate for them (religious, political, cultural, and social organizations), so it is important to describe what you are after and how things fit in (the mission of morals, politics, law(s), and enforcement). No definition of what these visual "Aesthetic Resources" are given in this title. A dichotomy is drawn between what is "developed" and "undeveloped". The terms "valuable visual features" and "natural features" is used, and "urban and suburban visual resources" expressed including "iconic structures", etc. "that alter the visual environment". A satisfied problem condition (finished design within a setting) is stated without regard to any scientific (objective) or

subjective measure, or identified in terms of a solution other than to recognize and emphasize it "Visual" exists. The issue here is the entire human and ecosystem experience, and if and how the human race may become a sustainable compliment within its global environment in order to survive (this condition would apply no matter what planet and universe one may live in).

This chapter should therefore read AESTHETIC QUALITY, and have "VISUAL QUALITY" as one of the subheadings. The question then becomes "what are the other subheadings, and "what are the qualities and controls within each (note "nature" is used within the definitions or relationship experiences within idea of aesthetics)".

One element to be considered in terms of "beauty" is "personal space", and is seemingly expressed often in the design of great plazas, great rooms, grand staircases, rooms without divisions and expressions of high doorways and entry ways, sweeping curved driveways across broad and open lawns bordered by low flowering perennials, and anchored by a fountainhead water feature spraying columns of movement orchestrated sweet smelling waters. By comparison, please appreciate the cattleman or the dairyman who moves across many broad acres in rounding up their stock; the woodman who goes deep in working the forests; the fisherman who voyages many miles out in the dangerous sea to find there harvest; or the airline pilot who flies high and deep into the darkness to carry hundreds of passengers safely to where they want to go.

The senses appreciation of distance and freedom may be for those who do not like crowds or being crammed into tightly packed elevators (perhaps they have had bad past experiences?), and may need to have "space", "distance", and "freedom of movement" and "openness of the senses and the mind" to accomplish their tasks. It is part of the ambiance or "Aesthetics" needed for them to function, and may be seen in their appreciation for paintings and pictures involving hunting scenes and landscapes, as compared to such ideas as cityscapes, "cubist" expressionism, and "Dadaism".

Note VISION 2050 promotion of "real time traffic services" (e.g.; "Waze, Google Maps", etc., as "innovative methods of managing traffic flow"), in conjunction with "Emerging technologies such as connected and autonomous vehicles" (see page 38), the harbingers of which now crowd through rural back roads and urban neighborhoods. This "off corridor" traffic disturbs and stresses both rural and urban qualities of life, disturbs and destroys rural and urban productivity, and disrupts community relationships and life. This need for space, distance, clean air, clean water, natural balance of odors, natural sounds, etc. would be measured under "Aesthetic Quality" and less so under a focused aspect such as a "Visual Quality" type measure.

The danger here is that the more removed from nature people become, the less they understand and appreciate its presence (or lack of it) in our environment, and the less they will appreciate the need for balance with nature and its ability to sustain us. Examples: The dichotomy in discussions about Global Warming. The dichotomy in discussions about Deforestation. The dichotomy in discussions about rainfall and other water resources topics such as the quick disposal of water away from something rather than the more important objective of recognizing (and need to acquire funding for) the need for water recycling and/or collecting and its channeling into ecologically balanced areas supporting wildlife.

One element of "Aesthetic Quality" is the characteristics and quality of sound. Examples of this is the quiet of a desert canyon; the sounds of nature across a broad woodland bordered pond; the sounds of

ocean surf rolling up against a rocky cliff; the sound of Beethoven's 5th Symphony played by the New York Philharmonic Orchestra; the sound of close encounter gunfire between warring desert armies; etc.

Similarly, other elements of "Aesthetic Quality" include the flavor and smells of fine food; the flavor and smells of early morning forest air; the flavor and smells of an Army Mess Tent before serving an early morning mess meal; etc.; until all these individual elements blend into an experiencing and seemingly endless moment.

This weighs into examples within the design community in its competition for uplifting the human experience. One example is research into "urban canyon design", and how sound or noise may be channeled, baffled, and noise abated or altered through the creation of and/or channeling for guiding and enhancing or cancelling of pleasing odors, sounds, etc. while extinguishing that which is adverse or unwanted. Bad design can cause much misery and suffering, which is measurable in terms of shifts in creativity, productivity, culture, disease, and crime. This movement also works hard for promoting architecture design and urban planning works which support wildlife and supports interesting and stimulating urban, suburban, and rural natural environments.

In summary, note VISION 2050 does not address the VERY IMPORTANT GOAL of overall enhancing the human AESTHETIC EXPERIENCE. No "AESTHETIC QUALITY" goals, and supporting regulations, are proposed.

An example of an "AESTHETIC QUALITY" matrix may look as follows, This should be divided up by each class of dweller (rural, suburban, urban, city, etc.), by tested population distribution sector preferences (in plotting out answers to questions, data clumping may be presented around certain types of demographics and lifestyle considerations (including age, family, housing location(s), recreation, upbringing variables, and type(s) of education, etc.). The "rural" lifestyle may find the following types of questions categories pleasing:

RURAL "AESTHETIC QUALITY" OF LIFE STANDARDS (opening thoughts))

SUBJECTIVE

Emotional feelings prized:

Physical experiences prized

Relationships prized:

Sense of consecutiveness and connectivity with:

a) community

b) culture

c) family

d) history (past)

e) nature

f) future (self esteem, plans, working for self and with others in finding success)

Proximity (sense of personal space, of freedom; and senses of movement, wonderment, peace, and enjoyment)

Sights:

Smells:

Sounds:

Tastes:

Touch:

Interpretive perceptions based on the interrelationship of memories, physical and personal relationships, contexts, language, etc.

OBJECTIVE (with human evolving discoveries and definitions)

Systems of sustainable relationships within the universe and our planets ecosystems (astrophysics, physics, geology and biology) which includes our man kinds sustainable place within it, and identifying and addressing the challenges that may imbalance this.

Mans ability to identify, grasp, and answer these challenges is a matter of mans workings, in the arts and sciences, and provinces of invention, innovation, and production to extend the solutions for relieving nature of the challenges brought on by us. In this mission is the creation of profitable commercial answers that may be delivered both domestically and abroad (this is needed as otherwise entities creating these solutions would be unable to pay their bills and support their own communities).

The mission here is to provide a method and means by which we may keep and enhance what is important and positive to us, and remove what is damaging and/or destructive to this positive course we wish to achieve. The VISION 2050 plan provides the rural community no seat by which we may voice and determine this course (we seem to be intentionally left out), and no plan and system of enforceable rules (no enforcement linkages) by which the human condition may rise; e.g., elevate the "AESTHETIC QUALITY" of mankind inside of "nature".

2.15 Earth (pp. 68-69)

2.15 "Earth" notes that "The region is a geologically active area susceptible to earthquakes, landslides, volcanic hazards, flooding, and coal mine subsidence", and states The need for infrastructure and land use planning, building codes, and critical area regulations to address these risks continues to be a priority throughout the region." and "Geologic hazard areas throughout the region are depicted in Figure 2.15-1", only a "flood hazard area" is depicted. It is known that the Cedar River Canyon has steep slopes prone to landslides, it has mapped liquefaction hazard areas, it has mapped coal mine (and thus subsidence danger) areas, and it has multiple geologic fault lines in the region of 196th Ave. Se and SE Jones Road, and SR-169. This map seems very incomplete.

2.16 Noise (p. 70)

Per 2.14 above, and the idea of "AESTHETIC QUALITY", with "Visual Quality" being part of this experience, so is "Noise Quality". VISION 2050 provides no remedy in this case, or under VISION 2040, by which disharmonies in Federal, State, and County laws may be addressed. This is not just a local

problem, it is an INTERNATIONAL ONE. To the degree this is locally addressed, we find fine shops, quiet and restful parks and natural areas, settlements and visitations by the famous and/or the productive, we find a polite and considerate society, a community or system of settings which draw near and inspire invention and innovation, and a tourism that competes to be inside this setting and share in its intellectual, cultural, spiritual, and natural settings. The ancient British Common Law principle of one's ability to have "quiet enjoyment" in their property would seem to draw mutual respect and courtesy between neighbors, but in Washington State a disharmony exists that brings cruelty, disregard, and tips balances that destabilizes rural areas, towns, and whole communities. This is just one of many forces VISION 2050 fails to address, and may be abbreviated through reciting just a few of the laws which create these tensions (and one "example" condition is given, and which may be "GOOGLED" to better understand its reach):

NOISE MITIGATIONS TABLE (see PG. 154):

On page 70, at 2.16 "Noise", not enough attention is given this, especially as it is related to the rural environment. Greater emphasis needs to be promoted here as this significantly impacts "quality of life". In Table 2.17-1 "Regulation and Policy Changes Applicable to SEIS Resources", NOISE should be added to their regulation areas of interest.

On page 155, Table 4.14-1. Potential Mitigation Measures: Noise, no approach is given by which individual and community complaints may be addressed (such as bringing the subject parties before a counsel and provide for mechanism to stepwise reconcile grievances). Nothing addresses specific noise sources such as "BACK-UP BEEPERS", "JAKE BRAKES", loud banging and slapping caused by the quick dropping of loads or changes in equipment direction (easily remedied by changing equipment use practices and also adjusting equipment properly) other than to state "Install mufflers and other noise-reducing devices..." and "Maintain equipment" how can one (or a number of parties) complain and bring this into a forum where action can be expeditiously and easily promoted in a friendly and low cost way? Obviously, it does not help if the response of your elected officials is to legislate immunity for the offenders and promote the community at large to be left with the endless suffering this creates. See RCW's RCW 7.48; 7.48.010; RCW 7.48.010 through 7.48.040., RCW 7.48.120, Crimes; malicious mischief: Chapter 9.61 RCW.; nuisances: Chapter 9.66 RCW., RCW 7.48.130, RCW 7.48.150, RCW 7.48.190 RCW 7.48.200, and disharmonies within Washington State Law Title IV Offenses Against Public Peace, Chapter 9.33 PUBLIC DISTURBANCE NOISE REGULATIONS (especially in ignoring the changing characters, volume, and content of sound and its effects on human and animal stress and health). It seems confusing to regulate noise to be under 40 dB, 50 dB, 60 dB, or even 77 dB, and then allow fixed and mobile equipment to operate impulsively and irritatingly about with some frequency, with fixed equipment and fixtures warning devices and back-up BEEPING devices, operating at 80-120 dB plus, and engines (loaded) operating at 80-120 dB plus, all promoted as legal as the measure for sound is based on some longer term averaging and a complete disregard for the qualities of and within the sound signature. These noises can radiate irritatingly for miles down and/or across a canyon corridor feature and disrupt the activities of homes and businesses containing hundreds and even thousands of people. These devices were only suppose to warn traffic and individuals of prospective equipment movement within a few dozen yards of a location (and warn only a hand full of select safety conscious people). Clearly, there is a failure in meeting design purpose. Solutions to this problem are quick and easy to design, easy to make and install, and readily applied at a modest cost. Enforcing codes to encourage change, and enforcing codes for a local source of supply, would encourage local invention, innovation and support to

address this NOISE challenge, and as you may see by GOOGLING this issue, a market for this (these) solution(s) may be global.

The idea of "AESTHETIC QUALITY" and elevating the human condition is a center point of invention and innovation. In order to be successful in this purpose, one must live in a supportive community; e.g., they must support the inventors and labor pool who work so hard for their benefit. It is respectfully urged that the Puget Sound Regional Counsel (or "PSRC") community recognize human needs and challenges, and encourages local invention and innovation through legislation, regulation, and enforcement including matching up inventors and innovators (and available resources) to profitable community challenges (they should get paid for their work and expenses just like everybody else does).

CONCLUSION

We live in a beautiful place that is progressively being killed off by special interests. This does not have to be. If we are polite and considerate of each other and the ecology that surrounds us, we can be a part of the Aesthetic Experience that is so important to the lifestyle and productivity of this region. We have laws with preambles which should support this. The Aesthetic experience is "in the dictionary" and is an old set of ideas.

On page 70, under 2.16 "Noise", a problem is expressed and no solution(s) proposed. Rather:

Road, rail, and air traffic sources account for the majority of noise in urban areas, with additional noise generated by commercial/industrial uses, construction, pets, and stereos/radios (King et al. 012). Recent studies suggest that planning strategies emphasizing increases in urban development densities and mixed uses may lead to an increase in exposure to traffic, construction, and related urban environmental noise (King et al. 2012). It can be assumed that as the region has grown over the last decade, so have noise sources in the urban environment. Noise at a local level, however, would likely vary according to proximity to noise-related activities such as high-traffic roads and construction.

The above is not a vision statement, nor does it propose solutions. This seems the case in many areas of "VISION 2050". The idea of a section on "Aesthetics", and use of inventors and innovators to solve problems, would be a solution as it historically has been. This may be best driven by government cooperation and code enforcement that offers incentives for using small business and innovators as a means to solve their problems. Government should also encourage inventors, innovators, and business of all classes to engage in international commerce by offering incentives (including contracts) and free (or no fee) access to government services and licenses (start-ups and small businesses are often very cash strapped in terms of being able to do their work; and domestic companies often must compete with overseas interests that operate within a cost, supply, and government support network which further places the domestic inventor/innovator at a disadvantage). Methods and means for further improving local competitiveness and global commerce reach should be encourag

[Commenter\(s\):](#)

Hendrick Haynes

Ian Scott

Communication ID: 350055

04/02/2019

I am in favor of the Transit Orientated option it appears to be the best base on your analysis. Asking communities to develop a displacement prevention plan as part of the City Master Plan to reduce the risk of displacement doesn't seem that that large of an ask since your require them to create a city master plan anyway.

Commenter(s):

Ian Scott

James Cooper

Communication ID: 344068

03/08/2019

As climate change encroaches, our land use patterns need to comply with the facts. Transit Focused Growth is the only option that attempts to spread population and jobs growth in a way that will ensure our auto-dependence reduces in time. Automobiles are responsible for a large chunk of GHG production in the state, putting people and jobs in places where the need is reduced is the responsible policy.

Commenter(s):

James Cooper

Janine Graves

Communication ID: 352005

04/08/2019

With all this growth and development what's your plan for waste? Sending it all to the cedar river landfill?! You've been "studying" it and traveling to Europe to study it... I'm sure on tax payers dollars. What's the plan? What's the strategy? I've found articles from the 70's and 80's asking the same question. One article was requests from the Issaquah School District regarding garbage being dropped in schoolyards IN THE 1970's!!!!!!

Commenter(s):

Janine Graves

Jeannette Sumpter

Communication ID: 354823

04/29/2019

I don't know what kind of publicity this was given, but I just learned about it today, so unfortunately I don't have time to study the proposals and make an appropriate response!

I can tell you, however, that I am adamantly opposed to the effort which is already underway, the goal of which is to get us all out of our cars and living in high rise apartments.

Jeannette Sumpter

Commenter(s):

Jeannette Sumpter

Jeffrey Moidel

Communication ID: 354681

04/29/2019

I would be in favor of the first 2 plan options—Stay the Course, and also Transit Focused Growth. I am adamantly opposed to changing the zoning in rural areas at this time to allow for greater growth. I think that the rural areas are important buffers that provide incalculable measure to our qualities of life for all, including the people in the surrounding urban areas. Otherwise, the Snohomish and King County rural areas will just become part of the sprawl—much like Los Angeles blends into the Valley there—it's one indistinguishable and uninspiring mess of a sprawl. There must be areas with acres of pumpkin patches and corn fields and flowers, areas with woods and native wildlife, areas where the air quality is not polluted by rush hour traffic, and areas where people can raise livestock. I do not see any plan or funds being allocated for improving SR 522 and the infrastructure around the proposed Paradise Road Apartments—and this is a disaster in the making! This is an example of exactly, precisely what should never be allowed to happen in this area. There is no infrastructure to support a complex like this, and yet that parcel was re-zoned to allow for urban growth. Why? First thing's first. Focus on infrastructure. Then bring the questions of growth back to the table.

Commenter(s):

Jeffrey Moidel

Jennifer Lutz

Communication ID: 347676

03/21/2019

Transit-focused growth at this point seems like the most sustainable choice given the expected growth. Having said that it does not comply with 50% (or more) reduce of CO2 and other greenhouse gases. I would like more research and attention to more renewable energy sources especially as the Transit Focused Growth would significantly increase higher density housing - solar panels on the south facing

roof line should be mandatory or highly incentivized. Similarly any new development should provide infrastructure for green energy options - with projected growth. This should also be mandatory or highly incentivized for the developers.

Additionally green spaces and storm water management should be protected and thoughtfully managed for carbon sequestration and reduction of surface water contamination.

Commenter(s):

Jennifer Lutz

Jerry Meyer

Communication ID: 354559

04/27/2019

To whom...

As a downtown resident and worker I subscribed to the "Downtown Density Bill of Rights." Please see below. Urgent action is needed to prevent our neighborhood from becoming unlivable. Over the last 9 years our quality of life has steadily decreased. If new tower development continues as planned I don't know if we'll stay in Seattle (ellevue is becoming more attractive all the time).

We need MHA legislation to:

Protect neighbors' reasonable access to light, air and privacy from a neighboring redevelopment.

Require projects can't move past EDG unless their functional designs provide equal access to shared alley right-of-ways and contain adequate internal space to contain their loading and waste functions.

Broaden representation in the Design Review process by including a representative of SDOT and a neighborhood representative to provide balance to decision-making.

--Legislation is needed to enforce responsible design criteria on new towers downtown. Density will only succeed if it preserves a safe, functioning and healthy environment for existing and future residential neighbors and people working downtown.

--Seattle needs density but not without limits. Nearly a dozen towers pending approval are being passed without addressing public concerns on their site-specific impacts.

--If towers aren't designed to fit individual site conditions, existing buildings, city streets and the environment will be the losers.

--There's only one chance to get this right before downtown Seattle is irrevocably reshaped for generations to come.

For more information on solutions for responsible downtown density contact: [email address].

Commenter(s):

Jerry Meyer

Jerry Waugh

Communication ID: 354634

04/29/2019

Downtown Density Bill of Rights

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--If towers aren't designed to fit individual site conditions, existing buildings, city streets and the environment will be the losers.

--There's only one chance to get this right before downtown Seattle is irrevocably reshaped for generations to come.

Commenter(s):

Jerry Waugh

John Feit

Communication ID: 344953

03/18/2019

Thank you for the opportunity. We need to take the most aggressive, transit-oriented policies as politically feasible. We should even push those boundaries. I am inspired by lidding freeways to create more publicly owned land, as advocated by the group Lid I-5 www.lidi5.org

Commenter(s):

John Feit

John Niles

Communication ID: 347657

03/22/2019

Paul:

Thanks for chatting with me yesterday on the Vision 2050 Open House.

I'm looking forward to receiving from you a pointer to documents covering the impact of the Vision 2020 Plans of past years produced by PSRC.

Also, please enter these three on-record comments on the Vision 2050 SEIS:

For each of the three scenarios, the modeled 2050 residential population within a half mile of all future high capacity transit stations should be stated in numerical tables.

2. For each of the three scenarios, the modeled 2050 daily transit ridership accessing each future high capacity transit station should be stated in numerical tables.

3. For all 2050 scenarios generally, there should be a comment on the potential for deployment of high volume battery-electric VTOL aviation service in 2050 between major employment nodes, transit centers, and regional airports, along the lines of a map shown by Uber Elevate at the Amazon Radical Urban Mobility think tank conference in April 2017 attended by transportation planners from around the nation. Further information on the intra-urban aviation topic at

https://www.eetimes.com/document.asp?doc_id=1334403# and <https://www.nasa.gov/uamgc>

John Niles

Global Telematics

Commenter(s):

John Niles

Johnathon Davis

Communication ID: 351188

04/03/2019

2050 is coming up quickly in terms of planning for growth locally as well as in terms of climate impact globally. Focusing on a transit oriented growth strategy is an important small step for climate and should be prioritized. This criteria should have outsized importance when making the decision. Letting people get around the region without a car is the only way we can begin to cut back on automotive emissions.

In addition, the costs of owning a car decrease the economic stability for thousands of families in the region that don't have the means to live in a transit rich neighborhood. It would be useful to see this

type of economic analysis included in the different studies. How many families with a car would reduce to 1 or 0 vehicles if they had more reliable transit and how does this affect their ability to support the local economy?

I didn't see it mentioned in the chart on the growth alternatives but zoning should be a large part of a transit focused growth solution. Many single family neighborhoods in Seattle have frequent transit but exclude building more dense housing that would welcome others to the neighborhood. Increasing density in these locations would reduce impacts of building all housing in dense areas on arterials where the air quality is reduced due to cars, trucks and buses.

Commenter(s):

Johnathon Davis

Jordan Goldwarg

Communication ID: 349903

04/01/2019

Thank you for the important work going in to planning for our region's future. In order to ensure a vibrant region for ALL, I sincerely hope that the final plan will incorporate specific, measurable goals related to racial and socio-economic equity. Otherwise, I worry that the whole region could become unaffordable for many people, or we will end up with a region increasingly segregated between wealthy (largely white) cities and towns, and poor (largely non-white) cities and towns. Thank you!

Commenter(s):

Jordan Goldwarg

Karen Herring

Communication ID: 345996

03/21/2019

Sammamish Washington has a myriad of Environmentally Critical Areas including lakes and tributaries that feed into Lake Sammamish where a Native Resident The Kokanee are struggling to survive. All manner of Environmental Impact must be studied, reduced whenever possible, and best choice is to eliminate it completely. Sammamish has partnered with King County, The KWG, and her own residents are participants in seeing to the environment of our city. Please respect the nature that this city enjoys and doesn't mind sharing with others. A citizen (I am a Steward for stormwater, habitat and native plants) can only do so much. Thank you.

Commenter(s):

Karen Herring

Kate Lunceford

Communication ID: 349233

03/29/2019

I support the idea of bringing growth around major transit centers but cities should still be incentivized to increase density. Transfer of development rights should be collected into a bank so builders in other parts of WA can use credits from Snohomish County farms. TDRs should be permitted in single-family home projects. The idea that the cost makes housing too expensive is ridiculous.

Development around transportation infrastructure makes sense as long as there is adequate access to the transit centers. We need buses in neighborhoods that can get people from home to a depot so we can get away from building high-rise parking garages. I would have to walk a mile to get to a bus so I drive.

Wherever transit centers are located livable development must be designed. Multifamily housing is great but needs to include some low-income options. Plan real grocery stores, 30% tree canopy now-not in 20 years, low-impact building, walkable streets, parks, benches - you know- livable!

Commenter(s):

Kate Lunceford

Kathryn Keller

Communication ID: 354543

04/26/2019

I prefer alternative two. However, we cannot escape the requirement to support complete towns with good transit access to rail and light rail for some older towns and cities where a lot of people live while we clearly need to improve complete places in areas like the Amtrak station near South Center.

What is key is jobs/housing/culture/society/life balance in towns and cities - less driving, more local transit. A long commute by any mode should not be the assumption for everyone.

My problem with option three is that while some individuals might need to augment their family means by traveling to work elsewhere, the expectation is that a town like Fall City exists to service the farmers in the area, not new suburbanites. We cannot encourage more of the likes of North Bend's subdivisions of McMansions, where people move specifically to have a long commute AND a big house.

Nothing should pass without first having programs and plans that ensure that people and small businesses are not displaced to anything more than a move within the same neighborhood to a new place at same cost, are not taxed out, or are helped to build in the backyard, etc., in areas targeted for density where people already live. The big businesses need to pay their fair share for this. And, the region needs to have standards that stop office parks, strip malls and suburban McMansion subdivisions.

Commenter(s):

Kathryn Keller

Kevin Tisdel

Communication ID: 349690

04/01/2019

Well I left a comment in the main page contact field. I hope you find it. I was not aware of my local meeting in Bremerton on the 19th. Not sure anyone in Kitsap was aware. My comment is this. We have a full model of high density in Seattle. Plain to see it has displaced generations of family. Pollution, health and environmental impacts fill the picture. We have to sprawl to the West. Small towns like Shelton, Matlock, Grizdale, all the way to, and beyond Aberdeen. Smaller businesses can thrive in small towns. Overcrowding is not an option, we all know better.

Commenter(s):

Kevin Tisdel

Laura Klepfer

Communication ID: 354556

04/27/2019

My Priorities: Affordable housing. Senior housing. Easy access to more rapid transit. environmental protection. Habitat preservation. Leave and plant way more trees. Protect all water. More walking friendly areas. Save farmland. Protect air quality including incentives for and recharge stations for electric cars. Preserve the architectural character of neighborhoods. DO not stretch out the urban boundary. More parks and protected open space.

Commenter(s):

Laura Klepfer

Lauren Anderson

Communication ID: 347679

03/21/2019

Pro Transit Focused Growth - promoting growth near transit centers is important as it promotes walkability, live-work situations, and less car dependency. It's also better for the environment: reduction in air pollution, habitat protection, sustainable use of existing infrastructure that can support growth (roads, utilities, buildings, etc.). However, some infrastructure will need to be upgraded, which is more \$.

TOD - Transit oriented development needs to be paired with low impact development, stormwater and erosion control/management, creation of parks and public space, and mixed-use development. "Smart" planning for parking and promoting use of public transit.

Commenter(s):

Lauren Anderson

Lori McConnell

Communication ID: 354669

04/29/2019

I would like to see the No change Alternatives pursued. Keep growth inside the current Urban Growth Areas. For the health of our families and communities, we need to protect our natural environment and maintain our rural, beautiful areas. It's a matter of health and sanity.

Commenter(s):

Lori McConnell

Margaret Ivie

Communication ID: 354295

04/24/2019

I prefer the transit based approach. Rural and unincorporated areas do not need to be urbanized when the majority of jobs are happening in the major cities. Housing and development in the major cities makes sense. The only reason people are flocking to the surrounding cities is because of better schools for their children and in some cases, because of housing prices. Seattle could easily pass a rent cap and start allowing more lower-income families to live there. Our state could also even out the schools by distributing property taxes from those who work in the city but choose to live outside it back to the city schools. Most people in the Maltby area who commute to Seattle would prefer to live closer to the city, but the school systems are not as good and there are not as many houses available.

Alternately, we could put more transit systems in place and spread the growth equally out from each city. There needs to be a balance between urbanizing every piece of natural land and creating housing options for people who want to work in the city but not live there. Right now, all the overflow from Seattle seems to come to our area and it has not been planned for. Our school crowding is unmanageable; commute times are rising by 20 minutes every 6-12 months. There is constant deforestation and worse gridlocks on the road during peak times.

So many people want to live here, it's become stressful and difficult to actually live here. This year alone I've seen 5 close families decide to leave for these reasons. If we do not check this growth, we will overcrowd our suburbs, the tech giants will move on to other cities, and we will be left with broken communities.

Commenter(s):

Margaret Ivie

Maribeth Crandell

Communication ID: 343619

03/06/2019

I would support the Transit Centered Growth option. It makes the most sense for many reasons. We need to rely more on public transit to reduce the impacts of climate change, help our communities move better throughout Puget Sound, provide transportation to seniors, low income and the disabled. Make our communities more livable.

Commenter(s):

Maribeth Crandell

Marilyn Martinetto

Communication ID: 343665

03/06/2019

Vision 2050 has a goal of accommodating "another 1.8 million more people and 1.2 million new jobs by 2050. The population is expected to reach over 5.8 million in 2050." That must assume that:

WATER IS THE MOST IMPORTANT NEED TO ADDRESS FIRST.

Additional WATER sources will have been developed both to replace the loss of snowmelt in rivers feeding larger cities as Seattle, and for 1.8 million or more residents. That will be during a time when California with its gigantic population and therefore representation in Congress' House of Representatives, will not be demanding more of our Columbia River water. Water will continue to be a major cause of wars and migration.

Also, if Washington remains a sanctuary state with welfare programs, it will be impossible to estimate future state populations.

TRANSPORTATION IS CRITICAL FOR SUPPORTING ADDED POPULATION.

States with large populations and highways to move them, used federal money in 1950s onward when land was cheaper, and farmers were selling. Here, that option was missed. This state still allows new developments with only one main outlet to support thousands of people in cul de sacs. We know we won't go anywhere in a large natural disaster for lack of grid streets and highways to/from main interstate highways.

In wealthy cities where middle class cannot afford to live, more commuters will result because more people must travel from farther away to do home and business repairs from plumbing to copy

machines, and many more service workers are demanded by the wealthy as maids, nannies, yard workers.

We aren't the Netherlands where workers, young and old, arrive on bicycles to walk down steps guiding their bicycle with its tires in a groove alongside, to underground bike parking for thousands. A tiny roofed vehicle might be carried in a worker's vehicle to be used to get to work of more than one mile to work. Or rented at the parking garage.

Socialist dictatorships order people where to work, and where to live, so I presume Washington is not yet there. But expecting large inbound population is going to tempt such solutions.

AGRICULTURE.

Growing food is critical. Protect farmland. But the WATER used by agriculture is usually around 80% of water used in a given state. That leads to competition between cities with the voters (who have no clue the water lettuce or cattle need to grow for harvesting). Thus there will be intense pressure to take WATER from farming. (I can see limiting crops to those consumed in the United States, because they're using our water and soil and energy. But farmers love the profits made selling to products as luxuries overseas. Worse, marijuana uses MASSIVELY more WATER than any crop.

But in meantime, farmland is gold. Saudi Arabia, China, and other WATER-starved nations are buying ARABLE LAND and WATER wherever in the World, leaders are stupid enough to sell that land and water in contracts. Ethanol plants are far worse.

My point: Why encourage much more population, particularly population unable to support themselves AND pay the much higher taxes needed to somehow accommodate too many people in terrain that is walled in by mountains, lakes, rivers and what's left of farmland?

I know the chamber of commerce types think only about GNP, and covet constant population growth. But would you rather live in China or Japan? I'd take Japan because it realized long ago it did not have the space because of its mountains. Same with Switzerland. Both specialize producing quality, with low births & immigration.

[Commenter\(s\):](#)

Marilyn Martinetto

[Marilyn Martinetto, Marty Martinetto](#)

Communication ID: 349947

04/01/2019

Please publish names of the donors who created or run the "non-profit" orgs. that are being given priority power to decide which applicants are given funding for transportation projects.

Transportation construction funding is already politically biased in favor of mass transit.

Unfortunately the funds are usually spent inside Seattle and King County. While the state government and business interests push for much more population growth, in a region limited by the Sound, Lakes and mountains, and an early, corrupt decision to run I-5 through Seattle, that lacked space for expansion, and sits on a web of geologic faults that still might awaken any of the volcanos in the Cascades created by the continued active continental and ocean plates.

To add "Social Justice is insane and is a warning that socialist-communist ideology is at work. What other activists propagandize "Social Justice? An undefinable state for humans who differ on every trait, mental and physical. We are each a mix of traits and experiences. EQUAL OUTCOMES for humans requires repeated taking from one population to give to another based on some favored trait in direct opposition to Rule of Law under our Constitution.

Our government was created to escape dictators and kings, whose personal whims were mercurial and erratic.

Vision 2050 is socialist if not communist. It allows a non-elected, non-governmental set of "non-profits" to take PRIORITY in the allotment of PUBLIC FUNDS to try to force EQUAL OUTCOMES on people whose Culture rightly was less corrupt than that of Cultures so sick as to grow socialist and communist followers. All this is possible only with the weakening of our once strong, reasoning middle class who were educated in public schools before "SOCIAL JUSTICE" dictated "mainstreaming of students in classrooms." Putin could not have done a better job of destroying the main EQUAL OPPORTUNITY provider, the U.S. public school system.

Now the goal is to force residents who learned, worked, saved and made homes in cities run by people who prioritize utilities, streets, public safety everything else to allow "social justice" however defined and regulated to decide state transportation.

This "Social Justice" tool, removes functional, objective transportation funding and replaces with an OPINION BASED SYSTEM run by or ADVISED by people who NEED to dictate to others, and WANT to force others to think as they do, that government must do the impossible: make people have EQUAL OUTCOMES defined by those ADVISERS. That's precisely the corruption-inviting lack of rule of law that makes corrupt nations fail.

REMOVE ALL INVOLVEMENT OF "social Justice" GROUPS. THEY CAN ADVISE, BUT CANNOT BE ALLOWED TO GOVERN. THEY WERE NOT CHOSEN BY US TO REPRESENT US, AND WE KNOW NOT WHO THEY WORK FOR OR ARE FUNDED BY.

[Commenter\(s\):](#)

Marilyn Martinetto, Marty Martinetto

Mark and Laurene Temple

Communication ID: 343380

03/02/2019

If only these three options are available we would vote this way:

Option 1 – Stay the Course

Option 2 – Transit Focused

We believe growth should be higher in city/urban areas where public transportation can be adapted easiest to deal with that growth. Without the infrastructure that cities have, rural communities would be hard-pressed to handle denser population. We recently heard that Pierce County (our county) is in discussion to adopt a six unit per acre allowance and we honestly cannot see how our local police, fire, roads, and public transportation can handle that. Plus, we're very concerned about the environmental issues. Here in our area, everyone is septic systems, not sewer. How can the ground handle this?

Commenter(s):

Mark and Laurene Temple

Mark Spitzer

Communication ID: 348379

03/27/2019

The most responsible and responsive approach would combine "Stay the Course" and "Transit-Focused Growth". Do NOT give up open space to sprawl growth. That is totally irresponsible because once the open space is gone, it's gone forever. Develop LAND USE and TRANSPORTATION together - as was not well done in Vision 2020. We're suffering from having to build transportation on top of a built-out environment in many places (poor 1970's voter decisions); so admit it, and move on to an integrated solution. It's where we need to end up. It'll cost extra; but that's a price we have to pay for not doing things right the first time around. Let's get going !

Commenter(s):

Mark Spitzer

Marlice Camus

Communication ID: 347671

03/21/2019

We would like a rezoning. We currently have 2.5 acres and cannot subdivide. Northshore is in the process of constructing an elementary school followed by a junior high adjacent to our property. We are close to the Maltby Road. Our quality of life is no longer rural or quiet. Pls consider rezoning our area so we can move on. We have lived in our house 42 years and our privacy is compromised.

Commenter(s):

Marlice Camus

Mary-Anne Grafton

Communication ID: 346291

03/23/2019

I am strongly in favor of reduced fares for low-income persons. I worked for years with homeless families and found that one of the biggest risks for eviction is a car breaking down. They need the car to get to work, and pay to get it fixed, and then don't have money for rent. One of the reasons lower-income people hang onto cars is that for many trips it is less expensive to drive. For example, I live six miles away from work, twelve miles roundtrip per day. It costs less than a gallon of gas to drive, less than \$3.00. The same travel on transit costs \$5.50 per day. Making transit more accessible with lower-fare eligibility could improve housing stability, which is good for everyone in our community--a surprise benefit in addition to everything else that comes with encouraging people to get out of their cars.

Commenter(s):

Mary-Anne Grafton

Megan Kruse

Communication ID: 354800

04/29/2019

29 April 2019

Greetings,

In addition to the transportation and infrastructure comments submitted for Escala and myself, I'd like to make the following suggestions for inclusion in Vision 2050.

2.5.2 Transportation System Efficiency Improvements

Bring back the ride-free zone in the core of Seattle to encourage widespread transit use and expedite loading/unloading of buses. The linked Seattle Times piece describes the economic benefits.

<https://www.seattletimes.com/opinion/forget-seattle-streetcar-restart-ride-freezone/>

5.4.5 Transportation Equity

Support and expand transit service like the one linked below that provides easy access to Puget Sound's regional parks by city dwellers, low-income families, people without vehicles or those who want to reduce carbon emissions.

<https://www.kingcounty.gov/elected/executive/constantine/news/release/2018/April/04-trailhead-direct-returns.aspx>

The ride free zone idea also supports transportation equity.

Resist congestion pricing. This disproportionately affects low-income families.

Transportation Impact Fees borne by developers are a better way to pay for density's impacts to the transportation grid.

Transportation Infrastructure

Suggestion: Require strict mandatory infrastructure requirements for new urban towers. If a tower's footprint does not support all required functional design for loading and waste, do not support that it be mitigated through a Transportation Management Plan (TMP). These unenforceable documents tend to offer impossible to keep promises such only certain size vehicles will arrive at certain hours to serve a building's needs.

TMP's are increasingly being used as a way to avoid providing sustainable but non-revenue producing design. Tower developers, both local and international, are focused on a profitable investment and many will not retain their investment post construction.

4.7.1 Public Service and Utilities

Concern: Stopgap mitigations are needed for recent developments with China declining to accept Puget Sound's waste and recycling, and the King County landfill having only 10 more years of capacity. If Oregon stops taking Seattle's garbage the whole system could fail.

Mitigation: While permanent solutions are pursued require residential towers to include trash compactors and pass periodic spot inspections to insure their recycling is acceptable for processing and won't end up in the landfill. Compactors will also help with the crush of packing material produced by ecommerce.

Long term recycling solution: Require Seattle maintains local recycling capacity tied to the annual population growth.

4.8.4 Social Equity

Suggestion: Cap the number of new towers that can 'pay in lieu' of building affordable housing into their projects. Once a zone's 'pay in lieu' threshold has been met, require developers include affordable housing in their developments or build or otherwise provide affordable housing simultaneously in another location within two miles of the new development.

Concern: Lower paid service workers are being forced out of the urban core and increasingly must commute from further away using more energy-consuming modes of transportation to accommodate split shifts or dual jobs in the new gig economy. Our urban centers should be socio-economically diverse.

4.9.1 Environmental Health

"Access to open spaces provides physical and mental health benefits and contributes to a high quality of life, especially for people living in cities and urban areas (PSRC 2018j). Providing increased access to open space and green spaces promotes mental health and encourages physical activity."

Concern: Increasing design review is considering straight zoning as the only criteria for new tower development and abandoning guidelines that might mitigate their environmental health impacts.

The result has produced repetitive big box architecture with buildings that stretch from lot line to lot line and 500 feet high filling every cubic foot of space. This growing forest of glass and steel fortresses leaves no open space for public benefit and is systematically blocking traditional light and air corridors that provide light to the sidewalks and neighboring buildings.

Suggestion: Enforce design guidelines be used and create incentives and requirements that new development includes open space and set backs that prevent density from transforming urban corridors and neighboring buildings into dark and claustrophobic places. Current building designs do not promote walking communities.

Innovation

Suggestion: Monitor the push for autonomous cars. Ubers and Lyfts have added to urban congestion. Autonomous cars are another category of SOVs and will draw a new sector of the population who wouldn't normally drive alone.

Commenter(s):

Megan Kruse

Melody Wisdorf

Communication ID: 354353

04/25/2019

Downtown Density Bill of Rights

We need MHA legislation to:

Protect neighbors' reasonable access to light, air and privacy from a neighboring redevelopment.

Require projects can't move past EDG unless their functional designs provide equal access to shared alley right-of-ways

and contain adequate internal space to contain their loading and waste functions.

Broaden representation in the Design Review process by including a representative of SDOT and a neighborhood

representative to provide balance to decision-making.

--Legislation is needed to enforce responsible design criteria on new towers downtown. Density will only succeed if it preserves a safe, functioning and healthy environment for existing and future residential neighbors and people working downtown.

--Seattle needs density but not without limits. Nearly a dozen towers pending approval are being passed without addressing public concerns on their site-specific impacts.

--If towers aren't designed to fit individual site conditions, existing buildings, city streets and the environment will be the losers.

--There's only one chance to get this right before downtown Seattle is irrevocably reshaped for generations to come.

Commenter(s):
Melody Wisdorf

Meloney Turner

Communication ID: 354682
04/29/2019

Stay the course

Commenter(s):
Meloney Turner

Michael Koznek

Communication ID: 347670
03/15/2019

I prefer the Transit Focused Growth proposal.

I am concerned about forcing low-income households farther away from transit, jobs, and services.

I would like to see more businesses where the owner lives above the shop.

I want to protect open spaces, farmlands, forestlands, and wetlands.

I want to see more mixed income neighborhoods.

Commenter(s):
Michael Koznek

Michael McCoy

Communication ID: 354419
04/26/2019

Current traffic congestion, no adequate docks, alleys too narrow to allow for two way traffic, no plans for garbage containers, no consideration of other towers in adjacent blocks. This city has a history of not addressing any of this in the approvals for new towers. And we all are suffering.

Commenter(s):
Michael McCoy

Mike Todd

Communication ID: 354799

04/29/2019

Erika:

A couple of thoughts/inputs on the scoping and ensuing development of the V2050 plan.

The name of the Transit Focussed Growth alternative may not be the right one - and the name itself may bias or limit the extent of the work that is done to develop that plan alternative. I think that alternative is more appropriately about a "Transportation System" bias; that Transportation System indeed includes High Capacity Transit (LRT long term, and BRT in particular for parts of Snohomish County), but it needs to also look at the state highways and local arterial aspects of the systems. I believe the point is that people need to get from housing to employment to education to recreation, etc on the transportation system, and our complete transportation infrastructure is comprised of mechanisms to move people in SOV, HOV, Transit, and accommodate walkers and bikers. If we only focus on LRT and BRT corridors but neglect the missing East-West road corridors in SW Snohomish County, for example, we will have BRT stuck on inadequate roadways alongside SOV/HOV - and our plan to focus growth around BRT will be a failure. Bottom line, I'd change the name to "Transportation System Focussed" instead of "Transit Focussed" to make sure we explicitly consider and balance our plan to reflect transit, cars, and pedestrians (and freight).

2. While it is certainly easier to make broad generalizations about the location of employment, housing, and the transportation systems that connect them, the devil can be in the details. I think that the data that SHOULD be available for this Regional Growth Strategy is more robust and informative than we have had in prior versions of RGS development; I encourage us to dig in and use it to test our generalizations. For example, it is common to say "xx% of the population in a certain area is within 1/2 mile of high capacity transit", so we plan growth targets accordingly. But I am fairly certain that measurement in the past has been distance as a crow flies, not the real distance for a walker to get to transit around other natural and man-made structures. First and last mile makes a huge difference for transit use; a trip starts when you walk out your front door and decide to get in your SOV or start your walk to transit. As an example of the data shortfall in the past, my own home shows up as easily within 1/4 mile of transit (as a crow flies), but I am more than a mile from the transit line due to a neighborhood of 70s style curved roads and cul de sacs, and a golf course. As another example, as Light Rail comes to south Snohomish County, I can picture where housing will be within 1/4 mile of LRT stations, but there is I-5 to cross. Thus, when we develop plans to put growth near High Capacity Transit, let's get data from Google Maps for walking route distances to transit stops, not simple linear distance from a residential area to a bus route drawn on a map. Maybe it is too much work to run the data at that level of granularity throughout the four county region, but I suggest we at least test the assumptions in some various locations to make sure our high level assumptions are realizable in practice.

Thanks.

Mike Todd

Mill Creek Citizen

(my individual opinion; not necessarily that of our City Council)

Commenter(s):

Mike Todd

Nancy Johnson

Communication ID: 347668

03/15/2019

Strongly favor Transit Focused Growth

Will protect more rural land

Will reduce CO2 the most - VERY IMPORTANT - for climate change and health

Increase housing density which will be more efficient energy use

Concern is housing/services for low-income citizens. How will this be addressed?

Commenter(s):

Nancy Johnson

Natalie Bicknell

Communication ID: 350056

04/02/2019

I support a transit oriented development plan for Central Puget Sound. We need to implement strategies that prevent our beautiful region from being choked by sprawl while also providing people with more mobility choices. Not everyone is able to drive, and we need to make sure that mass transit & other mobility options are available for all of the people who need them, especially vulnerable populations.

Commenter(s):

Natalie Bicknell

Nina Milligan

Communication ID: 352971

04/11/2019

My preferred alternative would be Stay the Course. My criteria for selecting this alternative are three:

Many cities have already invested in significant long-range planning for the 2040 plan and there is not compelling enough argument to change at this time.

The transit Focused Alternative is not right because it will burden communities and displace residents at too high a rate. Consider for example South Bellevue, or Bainbridge Island. Should those communities really take on more growth than Stay the Course?

The Reset Urban Growth is contrary to the GMA and reverses the work jurisdictions have invested in all these years to make compact cities, cities compact enough to sustain goods and services in walkable or transit - able neighborhoods. Just a superficial read of the comparison chart says this alternative has adverse effects in almost every category.

Thank you for the opportunity to comment.

[Commenter\(s\):](#)

Nina Milligan

[Pam Kepford](#)

[Communication ID: 347674](#)

[03/21/2019](#)

Transit-focused growth, please!

More transit! Better transit!

Last mile solutions - Shuttles? Bikeshares.

[Commenter\(s\):](#)

Pam Kepford

[Peggy Shepard](#)

[Communication ID: 354558](#)

[04/27/2019](#)

I am concerned about allowing growth goals to be interpreted as minimums, they should be maximum.

I'm concerned about the following statement included in the Vision 2050 Draft Supplemental Environmental Impact Statement:

"The Water Supply Forum notes in the 2012 Regional Water Supply Update that water supply throughout the region is sufficient for current and future use."

Without acknowledging that the Water Supply Forum also states: "Shortages are possible beyond 2050 under certain circumstances: If demographic growth projections became greater than forecasted"

I'm concerned that WSDOT is using PSRC's projections for growth (minimums or maximums?) to design improvements to the I-90 / 18 intersection.

Peggy Shepard

Snoqualmie City Council

Commenter(s):

Peggy Shepard

Peggy Shepard

Communication ID: 354332

04/24/2019

Hi Rod and PSRC,

The email below is from our community development director which has an attachment from Mayor Larson to PSRC regarding growth goals. He has sent other correspondence to outside agencies representing his perspective as that of the city, including King County's comprehensive plan.

The attached letter submitted to PSRC was not voted on by city council nor was there a survey of residents. My perception is that residents disagree with Mayor Larson's position.

Peggy Shepard

Snoqualmie City Council Member

Commenter(s):

Peggy Shepard

Peter Nigh

Communication ID: 351292

04/03/2019

I support the transit oriented growth approach. We should put the majority of the growth in the dense urban centers.

Commenter(s):

Peter Nigh

Rick Krochalis

Communication ID: 349671

03/28/2019

March 28, 2019

Mr. Josh Brown

Executive Director

Puget Sound Regional Council

1011 Western Avenue

Suite 500

Seattle WA 98104-1035

Dear Mr. Brown,

I am providing comments on the Draft SEIS for the Vision 2050 plan and following up on my scoping comments I provided in March 2018 regarding the possible impact of autonomous vehicles on the region's mobility and land use plans.

My scoping comments requested that PSRC study and model "the impact of new disruptive transportation technologies, data collection and management and specifically autonomous vehicles on current transportation planning practices. In the time horizon of the 2050 plan, there is a strong likelihood that a majority of vehicle traveling on our roadways will be operating with a high degree of automation."

I noticed that the Vision 2050 Scoping Report stated:

"VISION 2050 should address/evaluate emerging transportation technologies and account for anticipated impacts of these technologies on various aspects. These include understanding the impacts on growth, housing, travel demand, roadway capacity, safety, infrastructure design, land use, regional mobility, and transportation planning practices. PSRC should consider scenario based analyses to analyze emerging technologies and commenters also noted that it is essential to understand the impacts of emerging technologies on the movement of both people and freight."

However, when I reviewed the Draft SEIS, it did not appear to me that there were any significant descriptions of the impact of new transportation technologies, nor analysis of possible land use implications as I mentioned in my letter last year. In fact, Table 4.3-1, Comparisons of Key Regional Travel Measures, projected more than a doubling of transit riders from the 2014 baseline year and only forecast a 2-5% variation in transit ridership from the three alternatives studied. Further, this Table also projects a reduction in Single Occupant Vehicles (SOV) from the current 71% baseline in 2014 to a range of 62-64 % in the three alternatives. It appears that any variation in travel demand from disruptive technologies were carried across all the alternatives, thus not providing policy makers with any choices to respond to unexpected significant drops in transit usage or congestion from increased SOV usage from autonomous vehicles. I understand from PSRC staff that there may be a separate stand-alone

report that discusses impacts from technology, although that would not have the visibility to the public or the influence on policy makers that modeling different alternative futures would produce.

When I review what other regions are studying, namely Boston and Chicago, I see a willingness to evaluate different assumptions on the impact of disruptive technologies in order to explore a range of solutions that could accommodate shifts in travel behavior that may not assume scenarios like PSRC forecasts such as a doubling of transit ridership in the 2050 time horizon.

For instance, “Reshaping Urban Mobility with Autonomous Vehicles Lessons from the City of Boston states on page 4

http://www3.weforum.org/docs/WEF_Reshaping_Urban_Mobility_with_Autonomous_Vehicles_2018.pdf

“Our analysis predicts a clear shift to mobility-on-demand (for both autonomous and traditional vehicles), which will account for nearly 30% of all trips in the Greater Boston area and 40% of trips within city limits in the future. Driving this shift are the cost-competitive nature of robo-taxis and robo-shuttles – especially on shorter trips – and the added convenience and comfort compared with mass transit.

In suburban and other areas outside the city proper, our analysis found that mobility-on-demand will mainly replace personal-car usage. In urban areas, it will replace the use

of both personal cars and mass transit, to equal degrees, with the shift creating a risk of increased congestion. Policy-makers must assess and address the potential challenge and identify the right policy levers to influence this transition”

Further this report goes on to say on Page 10:

“Our analysis indicates that mass-transit ridership will decline significantly in urban areas due to the cost-competitive nature of autonomous ride-sharing services that provide door-to-door convenience and a guaranteed seat. Mobility-on-demand will account for more than 40% of trips in urban areas, with an equal defection rate from personal car and mass transit (14 percentage points each) “

The City of Chicago recently completed the work of a task force with a report entitled, “Road Map for the Future of Transportation and Mobility in Chicago” which stated on page 40:

https://www.chicago.gov/content/dam/city/depts/mayor/PDFs/21755_37_AF_MobilityReport.pdf

Connected and Autonomous Vehicles (CAVs or AVs) are an exciting transformational technology that offers the opportunity for the City to increase safety on its roads, improve traffic flow, increase accessibility and reliability, and provide an engine for economic expansion by freeing up numerous hours of lost productivity each year. **Conversely, if not carefully managed, the technology could also result in increased vehicle-miles traveled and increased sprawl, cause more riders to forgo public transit options, and exacerbate existing equity issues, including through lost jobs and unequal access.

**

I reaffirm from my letter last year that “there are certainly many unanswered questions on the cost, timing and implications of autonomous vehicles. That fact does not preclude analyzing in new alternative(s), how deployment of autonomous vehicles could:

Either cause a significant reduction in use of public transportation or alternatively, support the increased efficiency and effectiveness of mass transportation investments for major high capacity routes between the region's urban centers

Extend mobility options for rural and lower density communities by offering demand response connections to high frequency transit routes

Replace lower performing transit routes with demand response shared access vehicles where transit is not cost effective

Offer new transportation finance options by updating the traditional operating models of paratransit, carpooling, park and ride lots, vanpools, and Transportation Network Companies (TNC)

Adversely affect equitable access to affordable transportation by prioritizing market based mobility services

Create demand for road lanes designed exclusively for use of autonomous vehicles"

Thank you for the opportunity to comment.

Sincerely,

Rick Krochalis, AICP

Copy to:

Michael Jenkins, Seattle Design Commission

Sam Assefa (OPCD)

Linda Gehrke, FTA

Paul Ingram, PSRC

Erika Harris PSRC

Kelly Mann, ULI

Cristina VanValkenburgh SDOT

Commenter(s):

Rick Krochalis

Robbie Adams

Communication ID: 343346

03/01/2019

I strongly support pursuing the Transit Focused Growth alternative for VISION 2050. Climate change and housing affordability remain the greatest challenges our region faces. Transit-oriented development, increasing density, increasing walk-ability, investing in bike infrastructure, building "missing middle"

housing, and decreasing the occurrence of solo automobile commute trips are key to mitigating these challenges. Transportation is the largest contributor to climate change emissions in Washington state. Housing population growth near job and transit centers reduces trip times and the need for driving, thereby reducing emissions. Additionally, an urban and transit centered growth strategy will protect our wilderness from environmental degradation due to sprawl and development. An additional transit strategy to consider is the possibility of the development of high-speed rail being considered through the Cascadia Coordinator (Salem, Or to Vancouver BC). This innovation will further connect our greater region economically and socially, and possibly replace carbon emitting air travel with cleaner rail.

Commenter(s):

Robbie Adams

Robert Dinse

Communication ID: 349508

03/30/2019

Transit based doesn't work because transit tries to skim the cream. But the reality is people work night shifts, weekends, often live in places not dense enough for transit to be economical and we DON'T WANT to be stuck in high density ghettos.

Commenter(s):

Robert Dinse

Robert Larsen

Communication ID: 354847

04/29/2019

As we in the planning profession work to accommodate growth, particularly during a time when population growth is likely to accelerate, we need to step back and make sure we are doing more than "just" following the dictates of the Growth Management Act.

Specifically, an important question for those of you setting long range policy guidance regarding limits to growth and milestones we can set now that will help determine when fundamental changes are needed. This is more than just building for ever more density, going "up," forcing people to make hard transportation choices, turning our back on single family home owners who have aspired and worked for that goal for themselves and their children. Beyond those topical points we have bigger issues.

The first is long term demand for and availability of water. Next there's the seemingly intractable issue of medications, more all the time, being flushed into our precious, sensitive waterways, and finally the unfortunate effects of acidification on marine life.

We are located on the edge one of the world's special, sensitive places. It draws people here. We have water, a strong economy, fading but still somewhat friendly people.

As growth pressure keeps building, let's think about how to spread that growth out, particularly south, east and some north along our main transportation corridors. Please do that before we give up and push into the sky. We don't want our kids growth up on apartment balconies.

We will need a more robust water supply. That discussion should start now. A breakthrough on meds in sewer water is needed. Is there an answer in sight? If not we need to set limits. And finally, let's develop incentives for electric transportation.

Thank you, I hope this message is useful,

Robert Larsen

Retired City Planner

Current Chair, Snohomish County Planning Commission

Commenter(s):

Robert Larsen

Robert Palon

Communication ID: 351132

04/03/2019

I highly support the Transit Focused growth plan option. As a long time area resident, I believe we have to manage growth to match available transportation capacity to maintain our quality of life.

Commenter(s):

Robert Palon

Sally Lider

Communication ID: 347667

03/15/2019

Transit-focused growth is obviously the best alternative, although I don't think it really goes far enough toward addressing carbon dioxide emissions. Why would you even consider the option of "Reset Urban Growth?" All that does is increase the problem of moving people around to their jobs and homes, and makes all the environmental impacts on rural parts of the county much worse. We need to keep some trees! We need clean streams! Shouldn't we be making plans that make jobs and schools more accessible by bicycle and transit? I don't entirely understand why "Stay the Course" has more of an increase in accessible jobs than "Transit-Focused." Lastly, who will enforce these guidelines, and what good will all this planning do if money isn't taken out of politics!

Commenter(s):

Sally Lider

Sally Montgomery

Communication ID: 349463

03/29/2019

By 2050 the people who moved to Issaquah before 2015 will be gone, the animals will be gone, the trees will be gone. The water will have to come from other polluted waters, the crap being built will be the slums in the valley and Rowleys tall buildings and rape of the rest of the valley will cause air pollution to where we have to call on Beijing for help. Started under mayor Friesinger and continued under Mayor Butler. Those who loved this town and worked for it as volunteers will be gone after paying accelerating taxes for your brain farts. Traffic of course, you are going to fix. ??. Schools will still be overcrowded and education will be whatbit was prior to 1960. Becoming a regional hub without citizen input was a criminal and tasteless sign of arrogance. Nothing like a valley. Egress can't happen either. Good luck with your pipedreams.

Commenter(s):

Sally Montgomery

Sally Van Over

Communication ID: 354674

04/26/2019

I spoke with Ted Inkley, one of the people that helped write the initiative requiring counties to plan for future growth. We both looked at the summary you emailed me and agreed that the transit focused growth plan would be our choice for the future.

I have watched a lot of wasted money involved in Seattle's approach to transit transition and hope I won't watch piecemeal, expensive solutions to the regional planning. I understand that these are costly infrastructure projects but I do think the public is watching and waste of tax payer dollars only leads to distrust of the system that oversees it.

Thank you for sending me the summary.

Sally Van Over

Commenter(s):

Sally Van Over

Scott Marshall

Communication ID: 347669

03/15/2019

This does not go far enough, we are staring down the barrel of a mass extinction, one that humanity will not survive unless we reach 100% renewable energy within 5 years.

You are only thinking in terms of money, with human lives a distant afterthought. If fossil fuel companies are not swiftly nationalized and dismantled, people will die.

Commenter(s):

Scott Marshall

Sharon Kay Ricketts

Communication ID: 350521

03/25/2019

Dear Sirs:

Thank you for having an open house meeting in Bothell. I have two added comments after considering your choice of plans:

Core cities - I'm assuming you mean port cities? No way can Bremerton compare in population to such as Renton, Kent, Bellevue, or Federal Way. If your basic assumption is "port" for a core city, be careful on Everett for there is quite a competition on its harbor as to what kind of development.

2. As you happily plan for a huge population increases, you might consider a most interesting rat experiment: Rats were placed in a room with all the food, water, and nesting material that they would want. The only restriction was space. As they industriously multiplied, the social system broke down - no nest building and the mothers gave birth to their babies by dropping them on the floor as they were running around. Also, I believe it was in Washington DC where low income housing was by one huge building next to another. The social situation was so bad that many of the buildings had to be torn down to open up space.

Think hard on what you plan and for heaven's sake don't look to the Corp of Engineers as a mentor. They certainly are a prime example of poor planning.

A criticism - the maps on display were poorly labeled. Main routes (I5, Hwy 527, and 99) plus cities (Lynnwood, Bothell) should have been identified. Also lots of noise for comments but not one hint of an address.

Sincerely,

Sharon Kay Ricketts

PS A far out idea: Do you think 3D printing will destroy shipping/warehousing like Amazon is now doing to retail?

Commenter(s):

Sharon Kay Ricketts

Stephan Petryczka

Communication ID: 348818

03/28/2019

Hello, thank you for all the work that was put into this draft SEIS. I strongly encourage PSRC to drive the benefits of the transit-focused urban form in its reporting and communications, despite what seem like only slight long-term advantages (as measured by pollution, congestion, etc.). It feels like Seattle has built a lot of great momentum to move away from its sprawling, LA-like land use policies - hopefully more efficient regional planning can continue to guide the city into the future, despite widespread car dependency and NIMBY proclivities.

Commenter(s):

Stephan Petryczka

Steven Morris

Communication ID: 348568

03/27/2019

Growth absolutely needs to be near transportation. There is no way that roads, alone, can handle the anticipated growth. Upzone everything within walking distance of the Sound Transit light rail stations. Upzone, to a slightly lesser degree, the areas adjacent to the Bus Rapid Transit routes. Eliminate single-family zoning.

Commenter(s):

Steven Morris

Theresa Barker

Communication ID: 354563

04/28/2019

I am writing to express my support for option two, "Transit-Focused Growth." I am very concerned about the need for thoughtful and intentional growth decisions in this region. From a climate-change perspective, growth needs to support small businesses and important services being within easy transit or walkable distances in residential areas, which will reduce carbon emissions. People shouldn't have to drive to the supermarket or the dry cleaner or the clothing shop to purchase items for themselves or for their families. I am also concerned about social equity issues in growth, and maintaining affordable housing. From a social equity perspective, focusing growth of transit and of development together in

close-in, high-density areas provides better alternative to growth than displacing existing residents, especially lower-income and people of color. People will use transit when it is quick and frequent, and if they can access the services they need, including child care and grocery shopping.

Commenter(s):

Theresa Barker

Tim Harris

Communication ID: 351801

04/06/2019

The "transit focused" option makes the most sense for the region overall, however, it runs counter to human nature when it comes to cities like Carnation. As workforces at Amazon, Facebook, Google, and Microsoft get older and decide to start families, they will start looking for less dense and less urban locations to live -- the proverbial white picket fence. This will cause increasing pressure on locations like Carnation as home values increase, property taxes increase, and existing populations get displaced by these phenomenon. The purposeful disinvestment of King County in infrastructure for locations like Carnation will lead to traffic and environmental damage along the 202, 203 corridors, and the destruction of "rural living" for current residents. While it makes sense for PSRC and King County to encourage concentration of commuters around transit hubs, not everyone wants to live in a dense neighborhood. It will be imperative for King County to expand transit options to Carnation, Duvall, Fall City, Monroe, etc to mitigate increased congestion. There will need to be either a) assistance for low/fixed income residents in Cities/Towns to prevent displacement as property values increase, or b) economic disincentives to distort the existing market fundamentals that will incentivize affluent tech workers from driving up property values in cities and towns.

"Transit focused planning" is great so long as transit is available to the entire region. People with means will naturally want the ability to purchase lower density and higher privacy for themselves. High density apartment living and public transit can't just be the answer for "the have nots".

Commenter(s):

Tim Harris