

Comment Letters on VISION 2050 Scoping

The Puget Sound Regional Council sought public input on scoping for the VISION 2050 plan and SEPA environmental review from February 2 through March 19, 2018. Background information on the project and public comment period is available on the [project webpage](#).

The comment letters are organized by commenter affiliation: [Jurisdictions](#), [Organizations & Agencies](#), and [Listening Session Comments](#) are available in separate files. Contact information for individuals, including addresses, phone numbers, and emails, is redacted per PSRC's Public Participation Plan.

Individuals	Page
Mike Avila	3
Laura Barker	4
Michael Blumson	5
Clarke Brant	6
Ed Braun	7
Bridgette	8
Karen Bunce	9
Jing Chen	10
Denny Conner	11
AJ Cruce (1)	12
AJ Cruce (2)	13
Laurie Dumouchel	14
Ondine Eaton	15
Tye Ferrell	16
Rochelle Flinchbaugh	18
John Hempelmann	19
Rowan Hinds	20
Anne Holter	21
Terry Hurd	22
Jeanne	23
Mark Kenworthy	24
Will Knedlik	25
R.F. Krochalis	30
Carol Mitchell	33
David Moore (1)	34
David Moore (2)	35
John Niles	36
John Owen	38
Donald Padelford	40
Sandy Pernitz	41
David F. Plummer	42
David Richie (1)	43
David Richie (2)	44
David Richie (3)	45
Andrew Sang (1)	46

Individuals	Page
Andrew Sang (2)	47
Andrew Sang (3)	48
John Towers	50
Lael White	52
Thomas White	54
Dorian Yeager	58

Liz Underwood-Bultmann

From: Mike Avila [REDACTED]
Sent: Friday, February 23, 2018 3:52 PM
To: VISION 2050
Subject: Pierce County Planning

Follow Up Flag: Follow up
Flag Status: Flagged

1. I think it would be excellent to see Pierce County establish an "Area of Significant Beauty" from NW Trek through Elbe and Ashford to Mount Rainier"

Similar to the Cotswolds in England, UK.

Planning restrictions in Eatonville, Elbe and Ashford could keep out fast food services and have River Rock and Timber Frame Architectural requirements.

2. Establish a light rail terminal in Frederickson at Canyon RD and 176th.

--

Michael Avila, President
[REDACTED]

Liz Underwood-Bultmann

From: Laura Barker [REDACTED]
Sent: Tuesday, March 20, 2018 1:22 PM
To: VISION 2050
Subject: VISION 2050 Comment

To whom it may concern:

Yesterday I submitted a comment on the scope for the VISION 2050 plan; however, I mistakenly submitted it as a comment on the VISION 2050 website (on the "Setting the stage for VISION 2050" blog post) rather than through an official public comment channel. The content of my comment can be found here (<https://www.psrc.org/comment/44#comment-44>), and is also included below.

Thank you,
Laura Barker

EIS Scoping for Vision 2050

Permalink Submitted by Laura Barker on Mon, 2018-03-19 23:40

Thank you for the opportunity to comment on the EIS scoping for Vision 2050. I am writing you as a resident of Tacoma and as a professional planner. I believe the EIS for Vision 2050 should include an alternative that emphasizes transit-oriented development by allocating a majority of growth to metro, core, and large cities while reducing rural growth allocations. More specifically, significant growth should be allocated to areas surrounding (that is, within walking distance of) high capacity transit. Rural and small city growth in recent years has greatly exceeded that which was allocated through the regional growth strategy in Vision 2040; the new strategy should do more to ensure growth trends are brought into line with the regional growth strategy, with an emphasis on reducing rural growth.

Furthermore, housing affordability is a major issue facing the region. This is an issue of supply – there is simply not enough housing capacity in the region, creating an affordability problem that affects the entire region, but is particularly pronounced for low-income households. While I don't support expanding urban growth boundaries (except in very limited circumstances), I do believe the region's core cities should provide land capacity that is significantly higher relative to growth allocations and forecasts. Cities served by high capacity transit should demonstrate that they have provided considerably more buildable lands capacity relative to their population allocations. This doesn't necessarily require the expansion of urban growth boundaries; these cities can enact policy changes to create additional capacity within their current urban growth boundaries by, for example, allowing for higher densities in certain areas. Demonstrating the ability for additional supply to be constructed should help alleviate some of the pressure created by the region's rapidly rising housing prices, the burden of which is currently disproportionately borne by the area's low-income households.

Finally, I believe greater accommodation should be provided for outlying communities that are not contiguous to the main urban growth areas of the four-county region. These communities are generally physically isolated – separated from the larger metro area by swaths of rural land and connected only by two-lane rural highways. If we require that cities such as Buckley, Carnation, Fall City, Eatonville, Carbonado, Wilkeson, Sultan, and Orting accommodate the region's growth, we are almost certainly going to exacerbate traffic congestion in the region, especially in areas not served by transit. Such an action would be inconsistent with the existing environmental goals of Vision 2040 and should not be included in Vision 2050. We should not stop these areas from growing, but we should not require that they do grow by providing infrastructure in support of unsustainable growth.

Liz Underwood-Bultmann

From: Michael Blumson [REDACTED]
Sent: Saturday, February 3, 2018 11:01 AM
To: VISION 2050
Subject: Comments on Scoping

Follow Up Flag: Follow up
Flag Status: Flagged

Hello,

Thanks for the opportunity to participate in the scoping of the Vision 2050 plan.

Page 7 of the document indicates that there are some areas that may be covered, including housing affordability, economic inequality, and social equity among others. I would like PSRC to not only ensure that questions of disparity are a primary focus in developing new growth strategies.

Currently, regional investments have been a tool for catalyzing gentrification and displacement without sufficient resources or coordination among regional governments to address the impacts of these issues, particularly among communities of color. At this point, it is clear that without new ways of thinking about growth, we will continue to see development and infrastructure investments creating disparate impacts on communities that are the most vulnerable.

Thank you for your consideration,

Michael Blumson



Virus-free. www.avast.com

Liz Underwood-Bultmann

From: William Brant [REDACTED]
Sent: Tuesday, February 6, 2018 12:42 PM
To: VISION 2050
Subject: Traffic and Parking improvements for the Paine Field Airport

Follow Up Flag: Follow up
Flag Status: Flagged

Dear PSRC,

Re: Vision 2050 plan scope idea.

Very shortly commercial air traffic will start from the Snohomish County Paine Field Airport. This new option for air service is likely to become very popular as the current requirement of a very long drive from Snohomish and northern King Counties is becoming increasingly traffic impacted and is a very long distance at best. I believe the PSRC should set a goal of increasing parking at Paine Field as well as better freeway and transit access to this important new hub facility. In addition a goal of creating a light rail station nearby would also help reduce the number and length of motor vehicle trips to this airport. Better access to this close by facility will greatly reduce long vehicle trips to the current airport at Sea-Tac and help the entire region. This should become a main focus of the 2050 plan. Working with local governments and agencies on developing a plan forward can really reduce traffic throughout our metropolitan area.

Sincerely,

Clarke Brant
Normandy Park
[REDACTED]

Liz Underwood-Bultmann

From: Comcast [REDACTED]
Sent: Friday, February 23, 2018 4:27 PM
To: VISION 2050
Subject: Input

No more taxes.

Get rid of ST3 or revote it.

Reduce my car tab fees and property taxes.

I will give you more later but all of my inputs are to stop raising taxes.

Ed Braun

[REDACTED]

Graham WA [REDACTED]

[REDACTED]

Liz Underwood-Bultmann

From: Anne Avery
Sent: Thursday, March 1, 2018 8:46 AM
To: Liz Underwood-Bultmann; Paul Inghram
Cc: Michele Leslie
Subject: another comment from website

Another one on the blog post.. Please include in your list of scoping comments. Thanks!

Smart Urban Growth-- No Sprawl

[Permalink](#) Submitted by Bridgette E on Thu, 2018-03-01 08:40

Anything you could do to make sure dense development happens near urban/transit cores (i.e. around Link Light Rail stops, streetcars, bus rapid transit lines) would be appreciated. Dense development in cities + no-build "greenbelt" zones outside of cities in the Puget Sound area will preserve our wonderful PNW nature.

[REDACTED]

Liz Underwood-Bultmann

From: [REDACTED]
Sent: Thursday, February 15, 2018 7:47 AM
To: VISION 2050
Subject: Input for Scoping Vision 2050

Hello

I would like to see the following topics included in the Scoping Plan

Ways to assist families that need to care for aging parents -including those living in and outside the Urban Growth areas

For example:

Policies that encourage in-law units (ADUs) and tiny homes to help families have a place for their aging parents to live since senior and assisted living is limited in this county and VERY expensive

The recent changes to zoning as part of the reasonable measures actually discouraged this especially outside Urban Growth areas without regard to cost and family situations.

Ways to put pressure on the State to improve highways in our county.

There are many city and county roads that are being improved but there is not pressure at a state level to expand or improve smaller state roads in our county

For example: I live in Port Orchard - Sedgwick Road to the Southworth Ferry is dangerous, needs turn out lanes and wider shoulders.

Ways to support our schools so they can improve and expand.

It will not help encourage new businesses (especially larger employers) if we have not improved our schools.

For example: Support for local levies and offering land donations and infrastructure for the schools.

Ways to better support small businesses

Small businesses come and go in this county

- it is very difficult for small businesses to survive here

Taxes, community engagement, promotion to bring visitors etc

All of these issues need to be addressed if we want encourage smart growth in this county

Thank you
Karen Bunce
Port Orchard

Liz Underwood-Bultmann

From: Jing Chen [REDACTED]
Sent: Tuesday, February 13, 2018 7:45 PM
To: VISION 2050
Subject: Comment on Vision2050

Follow Up Flag: Follow up
Flag Status: Flagged

I think one crucial piece that is missing from the plan is preparing for earthquakes. Earthquakes have the potential to devastate Puget Sound and we are woefully underprepared. There needs to be a full court press from making seismic codes more rigorous, hardening lifelines and public infrastructure, including retrofits as required and not optional, to innovating earthquake insurance as New Zealand has. If we don't work on this, after an earthquake strikes this region, we may never recover and go into terminal decline. We can't count on the federal government to fund any rebuilding, given the current government's fiscal irresponsibility as evidenced by an obsessive focus on tax cuts for the rich and hostility towards non-defense spending (just one example is funding cuts for Sound Transit in the Republican administration's proposed budget.)

-Jing Chen

Liz Underwood-Bultmann

From: Denny Conner [REDACTED]
Sent: Friday, February 9, 2018 4:03 PM
To: VISION 2050
Subject: transit

I just want to say that the vision for mass transit in the region is massively short sighted and will be overwhelmed shortly after what's currently planned is implemented. Relying on more buses to move people around on streets is not the answer and the pace of rail development proceeds at the pace of a banana slug. It needs to be expanded so far beyond what is now planned, we are doomed to lose a lot of the jobs you are projecting because the quality of life is so hampered by transportation in this region.

DENNY CONNER

[REDACTED]

[REDACTED]



Liz Underwood-Bultmann

From: AJ [REDACTED]
Sent: Thursday, February 8, 2018 4:51 PM
To: VISION 2050
Subject: Vision 2050

Follow Up Flag: Follow up
Flag Status: Flagged

Your vision of 2050, is a joke. The roads, sewers and water are now maxed out. Tolt water is maxed out, I know this because I helped to build it. Our roads are a disgrace, it takes 2 hrs each day to drive to Seattle from Duvall, and that's on a good day. And the way I see it King Co. can not afford to maintain what they have. What you need to do is put a moratorium on all building in King County until you can fix what you already have that's Road sewers and water.

Sent from my iPad

Liz Underwood-Bultmann

From: Posielski, Aleks <Aleks.Posielski@kingcounty.gov>
Sent: Tuesday, February 13, 2018 3:43 PM
To: VISION 2050
Subject: FW: 2050 vision

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Vision 2050,

I am passing along some feedback and input from one of Councilmember Lambert's constituents.

Thank you,

Aleks Posielski
Legislative Assistant | King County Councilmember Kathy Lambert
516 Third Ave, Room 1200 | Seattle, WA 98104 Office - 206-477-1003

This email and any response to it constitute a public record and may be subject to public disclosure.

-----Original Message-----

From: AJ [REDACTED]
Sent: Thursday, February 8, 2018 5:16 PM
To: Lambert, Kathy <Kathy.Lambert@kingcounty.gov>
Subject: 2050 vision

Kathy I live here in Duvall. Driving to Seattle takes two hrs each morning and that is on a good day. Our roads are in terrible shape, and they can not carry any more cars. And King county has shown they can afford to maintain them. The Tolt pipeline is maxed out and I know this because I help lay the new pipe several yrs ago. And look at our treatment plant, it's maxed out, or did everyone forget what happened to it last winter, billions of gallons of raw sewage in Puget Sound and then they tried to blame it on home owners with septic systems. Are these people morons or what. Even our worthless Governor wants to penalize everyone with a carbon tax. We do not need anymore growth, we need a moratorium on growth and start fixing the mess we have. Thank you AJ Cruce

Sent from my iPad

Liz Underwood-Bultmann

From: Laurie Dumouchel [REDACTED]
Sent: Sunday, February 25, 2018 10:20 AM
To: VISION 2050
Subject: Comments on your four videos

King County 20 year garbage plan

I am unable to attend public hearings, however, I have watched the four videos and found no plans for the reduction of non recyclable garbage. For example:

Replacement of plastic bags for containing animal waste, household garbage and for multiple commercial uses.

Research alternatives for all other non-recyclable waste products.

Disposal of products when recycling life has ended.

Increasing uses and markets for recyclables

In addition, moving waste out of county is immoral. We create the problem here; we must solve it here.

Laurie Dumouchel

[REDACTED]
Issaquah, WA

Liz Underwood-Bultmann

From: Ondine Eaton [REDACTED]
Sent: Saturday, March 3, 2018 2:00 PM
To: VISION 2050
Subject: Comments

Please consider the simple idea that unending growth is not possible. We don't HAVE to continue to grow until everyone is unhappy or only the rich can afford to live here. We don't HAVE to let the tech giants dominate our economy and urban areas. We don't have the right to endlessly reproduce and overbuild until our planet is ruined. Limit growth to preserve public health and the environment. There are thousands of cities and towns across our country that need revitalizing and have plenty of housing, people are coming here because of the tech boom. Stop giving incentives to these giant corporations and prefer local businesses. Jeff Bezos has enough money.

Thank you,

Ondine Eaton

Liz Underwood-Bultmann

Subject: FW: VISION scoping comments

Liz Underwood-Bultmann, AICP | Senior Planner | Puget Sound Regional Council
1011 Western Ave Ste 500 | Seattle, WA 98104
206.464.6174 office | LUnderwood-Bultmann@psrc.org

From: Anne Avery
Sent: Tuesday, March 20, 2018 1:40 PM
To: Liz Underwood-Bultmann <LUnderwood-Bultmann@psrc.org>
Cc: Michele Leslie <MLeslie@psrc.org>
Subject: VISION scoping comments

A bold 21st-Century vision needed

[Permalink](#) Submitted by Tye Ferrell on Mon, 2018-03-19 21:35

PSRC's Vision 2050 Plan is being developed at a time of immense and urgent challenges for our region. We are in the midst of the sixth mass extinction on the planet, largely caused by human activity, and our human impacts are legion: the "blob" of warm water off the coast of Washington last summer, increasing flood risk, rampant wildfires threatening wildlife and communities. The list goes on. The extent to which we are able to respond to those challenges in the future will be shaped by the actions we take today. Now is the time to courageously face these challenges and define a bold new trajectory for our region, one that builds resilience and creates hope. The alternative is bleak.

As the pace of ecological, social, and technological change accelerates, the past is a less and less reliable guide for understanding and shaping the future. Ecological disruption in particular, of which climate change is the most pressing symptom, has reached a tipping point. If we are to be successful, our 21st-Century vision cannot be bound by a 20th-Century mindset.

The list of challenges we can anticipate if current trends continue is a long one. Technologically, robots and artificial intelligence are doing more of the work once done by humans; as our gadgets and infrastructure are increasingly networked, our vulnerability to hackers and terrorists increases; and as technology increasingly intermediates our interactions with the real world, our social and ecological relationships suffer. Socially, the risk of social and political unrest is increasing as wealth inequality stifles the economy and social mobility; and our food system will become less reliable as the climate becomes less predictable. Ecologically, our impacts on the ocean and Puget Sound are decimating coral reefs, salmon habitat, and shellfish. Carbon outputs resulting in climate change are increasing extreme weather events, forest fires, and other natural disasters.

The Vision 2050 Plan should acknowledge in clear terms the gravity of the challenges we are facing. Without a clear-eyed assessment of what we are facing, we will not be able to grapple head-on with the challenges and the opportunities they present.

Given the stark nature of these challenges, what are the opportunities? The big opportunity is to envision a different trajectory for our future, based on decisions we can make today. Our children's survival and well-being depends on it. For example, we can prioritize the communities and natural systems in our region. Regenerating our forests and streams is critical, but there is also an opportunity to creatively

expand nature into our buildings and urban areas. If now is not the time to begin regenerating the natural systems and ecological diversity of our region, when is?

There are many opportunities to regenerate our communities, including redefining work to encourage more time with our families and friends and greater involvement in community. Working less is probably the best way to reduce our ecological impacts and increase our sense of well-being, particularly as robots do more of the work. We can also expand our definition of community wealth to value the things that really matter to us as individuals, families, and communities. A focus on civics at the city level could breathe new life into civic affairs. This new civic energy should have a far-reaching focus on social equity and inclusion, ensuring that the wealth of diversity in our communities is tapped for energy and ideas. At the same time, increasing wealth and income equity has to be a priority. The massive and growing gap between the haves and have nots cannot end well if the trend continues unabated. There are multiple ways to increase equity, including through reform of our regressive tax structure, more worker ownership of enterprises, greater access to affordable housing, and a diverse ecosystem of local businesses. Tackling structural and institutional racism at the same time is vital. It is a festering wound in our body politic.

The future is coming, whether we choose it or not. The PSRC Vision 2050 Plan cannot change everything, but it can provide a bold vision for the future that sets a new trajectory based on the challenges and opportunities we face in this third millennium. Let's choose a future where we work together to make this place better than when we found it and in the process become more resilient to whatever comes next.

Liz Underwood-Bultmann

From: Brian Flinchbaugh [REDACTED]
Sent: Sunday, February 25, 2018 10:29 PM
To: VISION 2050
Subject: our vision

- 1) Please stop adding and or building houses in unincorporated pierce county without making the builders pay for some of the new schools roads etc. The amount can be based off of how many houses and how much the builder needs to put in before the project can be started.
- 2) NO NEW TAXES. We may be forced to move out of state due to the exuberant amount taxes have gone up for schools and fire, etc that we can no longer afford. The last 3 years have been the worst here in 98338 zip code.
- 3) The lotto needs to funds schools, as designed. Please go back to that original proposal.
- 4) At Frontier Park on Eustis Hunt Road, we need a pool built or installed. I shouldn't have to drive all the way to downtown Puyallup to enjoy swimming with my kids in a warm and safe environment. The Rogers High School Pool doesn't have a kiddy pool, which is needed here. The Puyallup High School Pool setup is needed here.

If you need any additional input, please keep sending these emails and or request feedback for certain topics that may come up.

Thanks,

Rochelle Flinchbaugh

[REDACTED]

Liz Underwood-Bultmann

From: John Hempelmann [REDACTED]
Sent: Saturday, February 3, 2018 10:13 AM
To: VISION 2050
Subject: 2050 Comment

Follow Up Flag: Follow up
Flag Status: Flagged

Facilitate transit oriented development of different types at all high-capacity transit stations.

CH& | John Hempelmann
[REDACTED]

A member of Mackrell International, a Global Network of Independent Law Firms.

This email message may contain confidential and privileged information. If you are not the intended recipient, please contact the sender by reply email and delete the original message without reading, disclosing, or copying its contents.

Liz Underwood-Bultmann

From: Rowan Hinds [REDACTED]
Sent: Friday, February 2, 2018 8:47 PM
To: VISION 2050
Subject: 2050 Plan Input

Follow Up Flag: Follow up
Flag Status: Flagged

I was active in local government late in the last century (Issaquah Mayor 1990-1997, Issaquah City Council 1979-1989) with many years service on the KC Regional Transit Committee, and the one change in public policy since then that bothers me the most is the concept of not building more road capacity because, "It will just fill up." Road capacity is the only public infrastructure that is subjected to this scrutiny as nobody questions building more schools, hospitals, fire/police stations, etc., with that standard. The reasons additional road capacity is used up is because there is still an unmet need for more personal mobility. Please remember, the car is not the problem, the fuel still used by (now most) cars is the problem, and rapid advances in both electrical and/or autonomous vehicles help ensure that by the time 2050 arrives the vehicle landscape will be totally different than now, and we need to plan for it. So the point of this missive:

In the planning for 2050, please ensure some modicum of time and effort is spent on planning for at least semi-adequate road capacity.

In the same vein: The simple fact is that whether or not 'enlightened' public officials like it, the population density of our Puget Sound Region is only now reaching the floor needed to provide adequate bus service, and is less than half of the density needed to support the light rail service that is so desperately wanted by current public officials. The population of our region would need to approach some 9 million people before light rail would begin to be economical, and we will never, much less in the next 30 years, reach that point. At least some of the billions of dollars we are now wasting on light rail would be better spent on addressing the road/bridge maintenance and capacity issues now before us. Please don't take my word for it, check the facts.

What questions do you have? Thank you.

Lynnwood, Brier, Greater Snohomish access to future train station

[Permalink](#) Submitted by Anne Holter on Fri, 2018-02-23 23:45

Light rail to Lynnwood is planned for N/S bound commuters, however accessibility points along E/W roads are overly congested and unfriendly for commuters in Lynnwood due to commuters who also travel from areas in Bothell. I believe adding a Park and ride, (and grocery store) between Bothell-Everett Hwy and the East side of 196th, along with a tram that goes from one end of 196th by EdCC to the other East end of 196th by a possible Park and ride would allow commuters to avoid driving into Lynnwood station, limiting E/W bound congestion. I also believe planning should consider passing ordinances on aesthetics for new buildings in suburban cities which include greater green belts, fewer high-rises, and architecture that reflects a cohesive cultural element in a city, such as Downtown Edmonds and Mill Creek City planning does.

[REPLY](#)

BLOG



[PSRC seeking public comment on scope for region's 2050 growth plan](#)

EVENTS



Liz Underwood-Bultmann

From: terry hurd [REDACTED]
Sent: Monday, February 26, 2018 9:49 AM
To: VISION 2050
Cc: terry hurd; nomade [REDACTED]; Cindy Beckett; david artis; Dean Haner
Subject: Your back yard

The Vision, you all so proudly feel is the direction to go, is a nightmare in Pierce County (UGA) Urban Growth Area. Concurrency of anything does not exist. On our single source Aquifer development progresses on lots of between 3000 to 5000 sq. ft. and smaller, not the 7200 as called for of 6 house per acre, in the community plan, do to your requirements. No thank you. No property is allowed to be divided to less. I cannot divide my acre in half and give my children a place to build upon, I'm not alone in that squashed desire. American dream not allowed. There is no road grid system to move traffic. Dead end developments of slum level density seem to be what you want with narrow roads where the children play in the 12 foot space between parked cars on the street because there is no room on the tiny lots to park. With no front, back nor side yards, the lots are little more than chicken coops and all back yard become kennels. All vegetation and top soil was removed and now the limited packed subsoil is the filtering medium for Aquifer recharge. Your plan pushes community septic tank fields, which are against federal law, with lots that should be ½ acre or more but are 3k to 5k not 20k+. Your plan will again destroy our aquifer as it did years ago in Parkland, Spanaway and Lakewood to a depth of over 600 ft. Lessons were not learned so history will be repeated. Many people lost their homes to pay for the overdevelopment standard the plan pushes. Schools. We put our children in portables, 25% in Bethel and our bond failed. Our population growth is first in the nation but the funds to accommodate the infrastructure and development levels is not to be found. The school districts need to build a new school every year to accommodate the 700+ children, without monetary help they have no room at school so large classes and year round may be required. It is not possible to find and afford property of size to build schools on and in the UGA. The county is not working to prepare for future growth using the "it's the incorporated cities responsibility to provide Urban Services" a bad joke on the people. We have no and will have no connecting bus system throughout the UGA. But the development density is allowed because there will some day be a bus route, but not planed nor funded now. Thanks again. Do to the Seattle transit welfare tax forced upon us , we voted against it, that is three times what vehicle licenses are in Pierce County, the money is for pork projects that will never reach the people that need the service here. It is not close but many, many miles away. So your plans are another unfunded mandate on the people tho for your transit blood is squeezed from the people. There is a reason the USA is not part of the British Empire. When policy makers from far away, Seattle, PSRC, push unwanted , unrequested regulations on a people who have no say in them, and we do not, the resentment only will grow. The Social experiment being pushed upon us is a insult to the Constitution and our founding fathers. The vision does not respect our community plan but helps pervert it, to not do what we want locally but you want by those who do not live with the many problems the plan creates, without resolving those we currently have from densification quotas forced upon us. The studies show we will run out of drinking water soon but a watershed is not available to us. The densification level you have set is not sustainable but you have a watershed, we have wells. The water drawn up is sent out the sewer system. Again lessons are not learned so failure is assured. Even your water storage system is limited when no rain falls. I am sorry no common sense is reflected in the plan. The vision will be taken as mandated requirements as past visions were and the path to American democracy's destruction is assured. We are not working together as our founding fathers foresaw could happen. The future is unpleasant to see unfolding. I speak as a citizen veteran. But I am not ignorant as I participate in the Frederickson Clover Creek Community Council, Frederickson Land Use Advisory Commission, Pierce Communities Coalition, Chambers-Clover creek Watershed Council and other community oriented organizations your not part of. I feel you need to address and stay in your back yard not mine. Terry Hurd

Sent from [Mail](#) for Windows 10

Liz Underwood-Bultmann

From: [REDACTED]
Sent: Friday, February 2, 2018 2:09 PM
To: VISION 2050
Subject: Growth plan

Follow Up Flag: Follow up
Flag Status: Flagged

Housing growth needs transport support, trams to lite rail. Trams to local service centers. Affordable rent.
Job growth/wage growth is essential w services like affordable daycare and commute.
Support workers and workers will support community needs/taxes

Good luck to us all

Sent from my iPhone

Liz Underwood-Bultmann

From: Posielski, Aleks <Aleks.Posielski@kingcounty.gov>
Sent: Tuesday, February 13, 2018 3:44 PM
To: VISION 2050
Subject: FW: Public input on VISION 2050

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Vision 2050,

I am passing along some feedback and input from one of Councilmember Lambert's constituents.

Thank you,

Aleks Posielski

Legislative Assistant | King County Councilmember Kathy Lambert
516 Third Ave, Room 1200 | Seattle, WA 98104
Office – 206-477-1003

This email and any response to it constitute a public record and may be subject to public disclosure.

From: Mark Kenworthy [REDACTED]
Sent: Friday, February 9, 2018 3:26 PM
To: Lambert, Kathy <Kathy.Lambert@kingcounty.gov>
Cc: Mark Kenworthy [REDACTED]; Linda Kenworthy [REDACTED]
Subject: RE: Public input on VISION 2050

Hi Kathy – I don't know how this problem is solved, but the biggest issue for our small business is affordable housing for our employees. What we need are more single occupant apartments that rent for \$1k or less per month. But, I'm sure the developers do the math and determine they can fill apartments that rent for \$1600/month and make those instead. Meanwhile, our employees move further away, spend more on gas and time commuting to work.

Again, not sure how this is solved, but it is a problem that is getting increasingly worse each year.

Mark

From: Kathy Lambert, King County Councilmember [<mailto:CouncilDistrict3@subscriptions.kingcounty.gov>]
Sent: Thursday, February 8, 2018 4:37 PM
To: Mark Kenworthy
Subject: Public input on VISION 2050

Having trouble reading this email? [View it in your web browser.](#)

Liz Underwood-Bultmann

From: Erika Harris
Sent: Tuesday, March 20, 2018 9:28 AM
To: VISION 2050
Subject: FW: Corrected submission as to initial comments respecting the "VISION 2050 Plan and SEPA Scoping Notice"

From: wknedlik [mailto:]
Sent: Tuesday, March 20, 2018 9:20 AM
To: Erika Harris <EHarris@psrc.org>
Cc: Kelly McGourty <KMcGourty@psrc.org>
Subject: Corrected submission as to initial comments respecting the "VISION 2050 Plan and SEPA Scoping Notice"

Ms. Harris:

Please substitute the text below -- with several typos corrected and with proper medical terminology replacing an erroneous usage previously -- for comments submitted to you late yesterday. I regret those earlier defects.

Thank you.

Will Knedlik

-----Original Message-----

From: wknedlik < >
To: VISION2050 <VISION2050@psrc.org>
Sent: Mon, Mar 19, 2018 5:58 pm
Subject: Initial comments respecting the "VISION 2050 Plan and SEPA Scoping Notice"

Ms. Erika Harris, AICP, Senior Planner:

The Puget Sound Regional Council's "VISION 2050 Plan and SEPA Scoping Notice" for updating its VISION 2040 purports, once again, "to consider new information and perspectives about a changing region" and to be "seeking community input to shape the plan" based thereupon, including PSRC's nominal inquiry directed to all residents of, and to each business within, the four county region in regard to "[w]hat important regional issues should we focus on during the update" (VISION 2050 Plan and SEPA Scoping Notice at its page 1).

In reality, paramount failures of VISION 2040 and of nominal transportation planning associated therewith and otherwise related thereto -- including PSRC's factually-and-legally deficient updating process for the region's transportation requirements -- derive from PSRC's utter defiance for its statutory obligations to design and to implement the legally explicit "least cost planning methodology that identifies the most cost-effective facilities, services, and programs" (RCW 47.80.030), and from its willful disregard for several related cost-effectiveness responsibilities, including those imposed pursuant to the State Environmental Policy Act with respect both to transport infrastructure and also to interfaces between transportation and land use (*i.e.* WAC197-11-400[6][e]).

In particular, Washington Administrative Code 197-11-400(6)(e) requires a rigorous cost-effectiveness analysis for bridges, corridor rights-of-way, freeways, highways of statewide significance, roads and streets, bus-rapid-transit and other transit programs, emergency services and emergency infrastructure and associated facilities and all other elements specified or implicated by the administrative code language employed therein, namely:

Significant impacts on both the natural environment and the built environment must be analyzed, if relevant (WAC 197-11-444). This involves impacts upon and the quality of the physical surroundings, whether they are in wild, rural, or urban areas. Discussion of significant impacts shall include the cost of and effects on public services, such as utilities, roads, fire, and police protection, that may result from a proposal. EISs shall also discuss

significant environmental impacts upon land and shoreline use, which includes housing, physical blight, and significant impacts of projected population on environmental resources, as specified by RCW 43.21C.110 (1)(d) and (f), as listed in WAC 197.11.444.

State law further requires cost-effectiveness assessments for transportation and for transport-related matters set forth within the "goals and policies" section of PSRC's current plan-and-scoping document (at its page 3), including but not limited to requirements of RCW 81.104.120, which Sound Transit has flouted for decades with aiding and with abetting *qua* provided by PSRC, through its professional staff, to misapply finite fiscal resources so as to exacerbate the transportation calamity generated and worsened by those regional agencies' collusion.

PSRC has either defied or else disregard all such cost-effectiveness obligations in its initial scoping, herein, in keeping with its standard *modus operandi* ever since domination over, and control of, its Transportation Policy Board were first handed to a parade of Sound Transit Board members appointed as officers of a nominal TPB.

Because PSRC's utter defiance for state law governing transportation planning and its willful disregard for state environmental regulations have continued for decades, and are continuing up to this day, and because PSRC's interrelated land use and transport planning processes are iterative, and reiterative, adverse consequences of its long-standing unlawful misconduct are cumulative and thus constitute a high-cost charade based on endless bureaucratic sleights-of-hand rather than on any kind of conscientious consideration of cost-effective solutions.

While PSRC acknowledges that traffic "[c]ongestion from rapid growth is reducing access to jobs, services, and housing" (VISION 2050 Plan and SEPA Scoping Notice at its page 2), it conjoins urban, suburban and exurban growth to cover up the fact that growth is disproportionally occurring in suburban/exurban interface regions (*cf.* misleading commentary in VISION 2050 Plan and SEPA Scoping Notice at its page 5) in order disguise its core role in destroying statutorily required "least cost planning" and in suppressing other cost-effectiveness duties.

Further, PSRC's focus of its attention and of resources under its sway on transit, bicycles and other modalities able to carry but a small fraction of total daily-person throughput (which has been on a downward trajectory, since World War II, and which is less-and-less functional for exurban population growth being covered up by PSRC staff), and its cardiac arrest of highway facilities constituting the beating heart of a genuine 21st century multimodal transportation system (to which PSRC pays endless lip service even as it degrades quintessential transport infrastructure), when taken together, compel its processes to become ever less intellectually honest and ever more devious, including but not limited to conflation of pedestrians and bicycles outlined in comments previously submitted (which are attached hereto and which are incorporated herein for every legal purpose).

In short, glaring inadequacies in PSRC's "VISION 2050 Plan and SEPA Scoping Notice" are only natural-and-unavoidable consequences of at least two decades of its utter defiance for, and of its willful disregard toward, its central legal obligations under pivotal state laws, which awful results include, but are not limited to, the self-acknowledged traffic "[c]ongestion from rapid growth [that] is reducing access to jobs, services, and housing."

Hence, PRSC's scoping process needs to be refocused upon those pivotal state laws that it has been violating, for over two full decades, if it is to avoid litigation to set aside its illegalities gilded with bureaucratic platitudes.

Respectfully yours.

Will Knedlik

.....

Kelly McGourty (KMcGourty@psrc.org)

Thank you – I will make sure this version gets captured in the formal record.

Kelly

Kelly McGourty
Senior Program Manager - Transportation Planning
Ph (206)971-3601



Puget Sound Regional Council

1011 Western Ave., Suite 500
Seattle, WA 98104-1035

From: wknedlik [mailto:]
Sent: Thursday, February 01, 2018 9:52 AM
To: Kelly McGourty <KMcGourty@psrc.org>
Subject: Corrected submission as to initial comments on PSRC's transportation plan update

Ms. McGourty:

Please substitute the text below, with typos corrected and with a light editing, for those comments submitted on the transportation plan update yesterday. I regret the higher level of errors than acceptable without corrections.

I also want to bring to your attention online difficulties experienced in submitting my comments yesterday, near the close of business, whether due to capacity issues with PSRC's internet facilities or for some other reason.

Thank you.

Will Knedlik

.....

PSRC's transportation plan update was constructed over at least a full half year, in third-and-fourth quarters of 2017, according to a PSRC website graphic presenting its basic timeline, before PRSC drastically changed both the central purpose for and also core parameters of its update when it nearly doubled its quintessential projection of population growth, as the key driver for traffic gridlock today, and for worsening congestion of various transport modes in the future, which numbers were released to its Executive Committee on January 25, 2018.

Simply put, when a dog is shot while the veterinarian is deworming him, efforts to smile and to finish that procedure on a thus-deceased canine is not simply illogical, but absurd.

Any attempt by PSRC to continue the update process in this instance would be still more ridiculous – and far more costly for regional taxpayers – since litigation would be certain, given that the *sine qua non* element for its own updating function was thus killed by PSRC itself.

Even without this gigantic change, PSRC's update was so gravely deficient that litigation already was invited by huge gaps, *lacunae* and worse – in facts nominally analyzed and in logic purportedly employed – so that its own lethal blow to that grossly flawed update should be welcomed as an opportunity to refashion such worthlessness into a workmanlike draft.

The principal defect with the update even before PSRC pulled the rug out from under the exercise by changing the dimensions of its estimates of population growth so immensely that it not only changed the size, but the nature, of such undertaking – and, thereby, both clearly extended, and also cumulatively exacerbated, the same underlying errors evident in earlier iterations of PSRC's transportation planning for some decades – is that

PSRC's commitment to multimodal transportation planning is not merely far more rhetorical than real, but is, therefore, not simply chimerical, but in fact now repeatedly counterproductive in multiple respects.

While our state is nearing the 120th anniversary of the start of a multimodal transportation initiative based upon explicit recognition of the paramount importance of good roads for such interconnected transport (which began with Sam Hill's founding of the Washington State Good Roads Association, in 1899, based squarely on his clear understanding that neither people, nor products, could be moved to and from railheads of the Northern Pacific line, reliably, because of then wholly inadequate roads and because of even worse maintenance of that infrastructure necessary and sufficient for such movement), and while it has been expanded to incorporate air transport as a since-invented mode (together with rail-and-water modes extant six score years ago), PSRC's *modus operandi* has been to allocate immense-but-finite transportation resources so as to degrade and thus to destroy bridge, freeway, road and street elements of *sine qua non* roads (as essential for multimodal transport).

While grotesque misallocations of ever more limited financial resources to modes that do not and cannot transport people and products with any proportional relationship to greatly escalating amounts of public funds being allocated to them in recent decades have been, and are, the primary reason for quintessential roadways literally collapsing from resulting neglect fostered by PSRC's direct aiding and abetting thereof through its gross misuses of tax dollars – such that the chief state transportation engineer has recently stated that “we have infrastructure that is crumbling under our feet now” in keeping with like concerns as expressed at least a full decade before by Honorable Doug MacDonald while Secretary of the Washington State Department of Transportation until he was cashiered for courage, and for candor, about such misfeasance if not malfeasance – PSRC's *faux* planning in its furtherance of knowing-and-willful congestion does not end simply with misuses of taxes.

Indeed, the current draft update released for comment continues its earlier promotions of bicycles as a mode of multimodal transport without providing reliable documentation of whether additional growth of bikes on public streets will increase or decrease congestion, increase or decrease deaths and serious injuries, and increase or decrease other adversities for crucial throughput of people as passengers and for throughput of products as freight?

For example, when one bicyclist repeatedly delays a standing-room-only Metro 255 bus, which is my primary mode of transportation between Kirkland and Seattle, as it travels on its route from Kirkland to Bellevue on 108th Avenue Northeast, as occurs on myriad occasions, then that single bicycle rider is not only holding up as much as a half-mile of cars, but it is also holding up numerous transit vehicles, which also can and do include Sound Transit 540 passengers, school students on school district buses and other people.

Further, and far worse on some respects, **bicycling is an inherently dangerous activity**, which results both in deaths and in severe injuries to bicycle riders impossible to mitigate without construction of separate facilities for bicyclists, who have indicated, repeatedly, that they are not interested in financing those facilities for their use and that they prefer to poach transportation infrastructure dedicated “exclusively for highway purposes” (which does NOT include bicycle use to the extent permitted in an inherently dangerous fashion).

Furthermore, limited increases in bicycle use is resulting in additional deaths and serious injuries, and is so preventing legally mandated reductions in roadway deaths toward zero.

In addition, PSRC disguises the tiny person-and-product throughput actually possible by lumping bicycles together with pedestrians (**as completely different transport categories distorted by the willfully misleading conflation of humans with one type of vehicle**).

The illogic is as great as positing a single category for people and for motorcycles, which likewise travel on two feet and on two wheels respectively, or for societies and for coffee pots, since dregs both find their way to the bottom (as does this distorting *faux* category).

Human beings are not similar enough to any kind of vehicle, motorized or nonmotorized, to be meaningfully lumped into one category, particularly when nearly 100 percent of all trips do start and finish on two feet, for all having two legs, and when bike trips are a tiny percentage of all pedestrian-and-bicycle trips, so that said falsified category is necessarily intended to mislead.

To add injury to insult, real human beings are substantially endangered, **as pedestrians**, by those vehicles, if bicycle use rises without separation from pedestrians, who can be and are run down by bicyclists repeatedly in recurring misuses of sidewalks (as designed by definition and otherwise for pedestrians but as NOT often in fact designed for bikes).

Additionally, the update does not adequately deal with conversion of already-insufficient roadways, which are further harming person-and-product throughput in motor vehicles, as well as emergency services reliant on already-overcrowded roads, nor does it deal at all with the reality that roadways financed “exclusively for highway purposes” (pursuant to mandatory terms of the Washington State Constitution in Article II, section 40) obligate a provision for **full** reimbursements of the state’s Motor Vehicle Fund for monies supplied to finance those so-degraded roads (plus the time value of monies thereby expropriated).

In short, PSRC’s nominal planning process respecting bicycling is nothing short of patent dereliction of its duties, including but not limited to its explicitly assigned obligations for “least cost planning methodology” (together with WSDOT and other specified agencies).

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Liz Underwood-Bultmann

From: Rick [REDACTED]
Sent: Friday, March 2, 2018 10:01 AM
To: Josh Brown
Cc: VISION 2050; Kelly Mann; Linda Gehrke; Cristina VanValkenburgh; Michael Jenkins; Ross Tilghman; Brianna Holan; goran.sparrman@seattle.gov; sam.assefa@seattle.gov
Subject: Comments on Vision 2050 Scoping

Mr. Josh Brown

Executive Director

Puget Sound Regional Council

1011 Western Avenue

Suite 500

Seattle WA 98104-1035

Dear Mr. Brown,

I am responding to PSRC's request for input on key assumptions to inform the 2050 plan update, State Environmental Policy Act (SEPA) Scoping, environmental issues for analysis and what alternatives should be considered.

One category of your key assumptions is "Focus on emerging and important issues."

I would like to identify a vital and emerging issue that seems to be missing in any of the topics slated for review in the SEPA scoping, plan update and alternatives to be considered.

The subject I would like to be considered is 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 (see Aspen Institute's **Taming the Autonomous Vehicle—A Primer for**

Cities, page

9 <https://www.bbhub.io/dotorg/sites/2/2017/05/TamingtheAutonomousVehicleSpreadsPDFreleaseMay3rev2.pdf> and
Autonomous Vehicles Implementation Predictions page 17 <https://www.vtpi.org/avip.pdf>

The City of Seattle's Mobility

Playbook <https://newmobilityseattle.info/storage/app/media/Documents/newmobilityplaybook.pdf> has developed a policy framework worthy of PSRC's consideration in the Vision 2050 update process. The City of Los Angeles also has a rigorous policy analysis of the potential impact of new transportation technologies on our traditional mobility models (see **Urban Mobility in a Digital Age** <http://www.urbanmobilityla.com/download/>). In addition, the Boston Metropolitan Planning Organization has recently completed a current practice survey entitled: **Connected and Autonomous Vehicles and the Boston MPO--A First Look**, <http://www.ctps.org/autonomous-vehicles-first-look> which cites PSRC's modeling efforts and highlights scenario planning undertaken by the Atlanta Regional Commission and Delaware Valley Regional Planning Commission.

I believe that the next critical planning initiative for the Puget Sound Regional Council is to prepare new scenario based alternative(s) studying the potential for autonomous vehicles to dramatically influence traffic demand management for our roads and highways, extend the reach and productivity of public transportation, create new land uses for repurposed parking garages and gas stations, and reduce the carbon footprint attributed to the transportation industry. It appears that the PSRC's 2050 plan is poised to be the appropriate means to more fully evaluate these issues as part of new plan alternative(s).

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:

- 1) 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
- 2) Extend mobility options for rural and lower density communities by offering demand response connections to high frequency transit routes
- 3) Replace lower performing transit routes with demand response shared access vehicles where transit is not cost effective
- 4) Offer new transportation finance options by updating the traditional operating models of paratransit, carpooling, park and ride lots, vanpools, and Transportation Network Companies (TNC)
- 5) Adversely affect equitable access to affordable transportation by prioritizing market based mobility services
- 6) Create demand for road lanes designed exclusively for use of autonomous vehicles

Thank you for your consideration of these new technologies in your update of your Vision 2040 plan.

Sincerely,

R.F. Krochalis, AICP

Copy to:

Goran Sparrman (SDOT)

Michael Jenkins, Seattle Design Commission

Sam Assefa (OPCD)

Linda Gehrke, FTA

Paul Ingram, PSRC

Erika Harris PSRC

Kelly Mann, ULI

Liz Underwood-Bultmann

From: Carol Mitchell [REDACTED]
Sent: Saturday, February 3, 2018 10:41 AM
To: VISION 2050
Subject: Public comment

Follow Up Flag: Follow up
Flag Status: Flagged

As our region prepares for growth, we need to take into consideration our infrastructure ie traffic. We need to focus on reducing congestion and our carbon footprint. It is important to promote and fund light rail, increase electric car charging stations.

More people means more housing and more business. Any future building of office towers, apartments or single family homes must be built for sustainable green energy. Solar panels, wind energy, green building materials. Green buildings. Homes need to be affordable for all, not just the wealthy.

More people sadly means increased need for social services and medical care. The homeless population will increase. A comprehensive permanent rehousing plan must be developed.

How to pay for this? Taxes will increase. We need to fix our regressive and upside down tax system by closing the tax break for capital gains. We need single payer health care.

Thank you.

Carol Mitchell

Liz Underwood-Bultmann

From: David Moore [REDACTED]
Sent: Sunday, March 18, 2018 8:35 PM
To: VISION 2050
Subject: Comments

Please continue to uphold the Growth Management goals to protect our citizens and natural resources, such as water, forests, wild salmon and other wildlife. This includes continuing to provide alternatives to automobile travel, treating our wastewater, sustaining as high percentage of forest cover as possible, protecting recreational forests such as parks, encouraging dense low cost housing where compatible. and good jobs with fewest detrimental environmental impacts. Citizen involvement and planning for future possible sea level rise and hotter temperature effects of waterways, forests, and agriculture are crucial. Dave Moore/ Seattle

Liz Underwood-Bultmann

From: Paul Inghram
Sent: Monday, March 19, 2018 9:39 AM
To: VISION 2050
Subject: FW: Form submission from: Contact Us

-----Original Message-----

From: Puget Sound Regional Council [mailto:website-no-reply@psrc.org]
Sent: Sunday, March 18, 2018 7:53 PM
To: Andi Markley <AMarkley@psrc.org>
Subject: Form submission from: Contact Us

Submitted on Sunday, March 18, 2018 - 19:53 Submitted by anonymous user: 174.24.246.158 Submitted values are:

Your Name: David Moore

Email: [REDACTED]

Question or Comment? I support the progressive ideas started with the Growth Management Act which was designed to accommodate more population and save our natural resources. Water quality and quantity management, conserving large tracts of forest, alternatives to auto travel, all these must be updated and given funding to achieve these goals with county, city, state, tribal and federal government as partners.

The results of this submission may be viewed at:
<https://www.psrc.org/node/10/submission/674>

From: John Niles [REDACTED]
Sent: Monday, March 19, 2018 4:20 PM
To: VISION 2050
Subject: Issues for scope of Vision 2050 SEIS

March 19, 2018

I recommend these issues be considered in the SEIS scoping of the Vision 2050 plan for regional land development:

Legal, regulatory, and infrastructure support for a growing daily VMT share of battery-electric motor vehicles of all sizes, ranging from bicycles to cars to trucks to buses, including the provision of locally-generated renewable power from the sun and local energy storage in batteries that are installed in homes and commercial buildings. This kind of vehicle power replacing internal combustion engines is vital for GHG reduction. There are implications for building codes in this recommendation.

Vehicle control automation in passenger transport vehicles of all sizes that would make public transit service with rides-on-demand being cost-effective in lower density areas of land development. Reasonably contemplated for the post-2040 time frame. This potential permits some decoupling of land development density from public transit. This topic is covered in a forthcoming book, *The End of Driving: Transportation Systems and Public Policy Planning for Autonomous Vehicles* (Elsevier 2018) by Bern Grush and John Niles.

Consideration of worldwide development of small, quiet electric aircraft (multiple-bladed helicopter, VTOL, joy-stick controllable) and how the use of such airplanes could fit into urban regional use, for both passenger and package transport. Airbus, NASA, Uber, UPS, DHL, FedEx, and other organizations are now working to develop airborne vehicles such as these with applications in revenue service well before 2030. There is serious work overseas on deploying pilot-less, automated air-taxi service for short hops in built-up urban areas. In the post 2040 era, one can envision an airborne public transit service connecting rooftops of high-rise residential and commercial structures.

Support for much more serious urban commercial activity centralization in outlying urban subcenters like Tacoma, Everett, and Bremerton, facilitated by transport links that allow very fast reliable access between centers, beyond what is now possible with today's ferries, buses, commuter trains, and light rail.

Establishment of a process to monitor retail industry development and what it means for the viability and evolution of today's retail shopping centers and home delivery processes, as recommended in Nelson, Niles, and Hibshoosh, "A New Planning Template for Transit-Oriented Development," Mineta Transportation Institute, 2001, Report 01-12.

A very serious focus on support of freight mobility focused on the NW SeaPorts, regional industrial centers, and the many regional distribution facilities located in the central Puget Sound region. This could be a focus of a revitalized PSRC Freight Mobility Roundtable which has languished since the sudden death of its long-time chairman Daniel O'Neal, former chairman of the U.S. Interstate Commerce Commission and the Washington Transportation Commission.

Consideration of merging Lewis, Thurston, and Skagit County into the PSRC MPO, with video-wall meeting facilities to support virtual face-to-face governance meetings across the region.

Some of these recommendations could be incorporated in alternative scenarios with simulation of impacts.

Please acknowledge receipt.

Respectfully submitted,

John Niles

President, Global Telematics, Seattle

Executive Research Director, Center for Advanced Transportation and Energy Solutions

Member, PSRC Regional Traffic Operations Committee

Liz Underwood-Bultmann

From: John Owen [REDACTED]
Sent: Thursday, February 15, 2018 4:52 PM
To: VISION 2050
Cc: Paul Inghram
Subject: Comments re: VISION 2050 scope and EIS scope.
Attachments: CommercialDevelopmentIntensityDiagram.jpg

Erika,

I would like to submit suggestions for both issues to be addressed in the VISION 2050 update and the accompanying EIS.

Re: the VISION update itself, I would like to see PSRC address:

1. Strengthening measures to distribute employment growth to identified areas. VISION 2040 identifies a number of locations for employment growth throughout the 4 county area but growth has been concentrated in central King County and to a limited extent in Snohomish County. This creates a mismatch between the location of jobs and housing. For example, land, infrastructure and housing is plentiful in Tacoma, for example, but Seattle is attracting the bulk of development even though the city is unable to support it equitably. (See Thinking about Housing in the Northwest by Dr Ali Moddares <http://www.newgeography.com/content/004312-thinking-about-housing-northwest>) The conceptual cartoon-diagram illustrates this issue.
The fault is not in the growth strategy itself but the ability to implement it. So, I would like to see the strengthening of policies and actions related to locating employment more effectively. Could multi-county policies identify metrics and limits measures to limit local growth based on concurrency requirements?
2. A regional approach to gentrification and displacement, which is a growing concern and one where issues of equity directly intersect land use and transportation policies. I would be happy to discuss this with you further if you wish.
3. An action oriented approach to open space planning as is outlined in the recent work your office has done. We now have the analytical tools. It would be great if we could craft an interjurisdictional approach with the full range of public and non-profit partners to take advantage of the work done so far.

Re: the EIS, I think the analysis should:

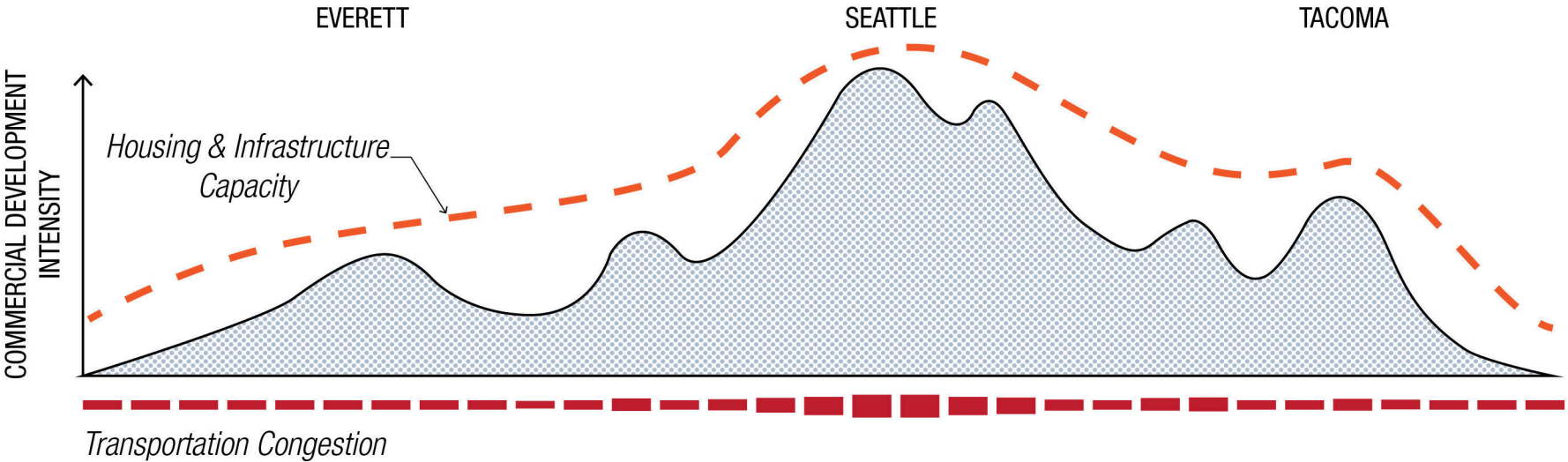
1. Identify which cities are meeting concurrency and what the new strategy will require from them to do so.
2. Impacts to environmental systems, especially those of a regional nature that must be maintained for the region's ecological framework to be sustained.
3. Stresses put on open space and recreational opportunities.
4. Impacts related to displacement of residents and businesses around high growth areas.
5. Identify what interim, short term mitigation measures could help with current rapid growth spurts.

As you know, I believe that our most pressing problems have a significant regional component and that solutions to these problems will require regional solutions, so I urge PSRC to be assertive in framing both a vision and proposing regional implementing measures. Thank you for the opportunity to input.

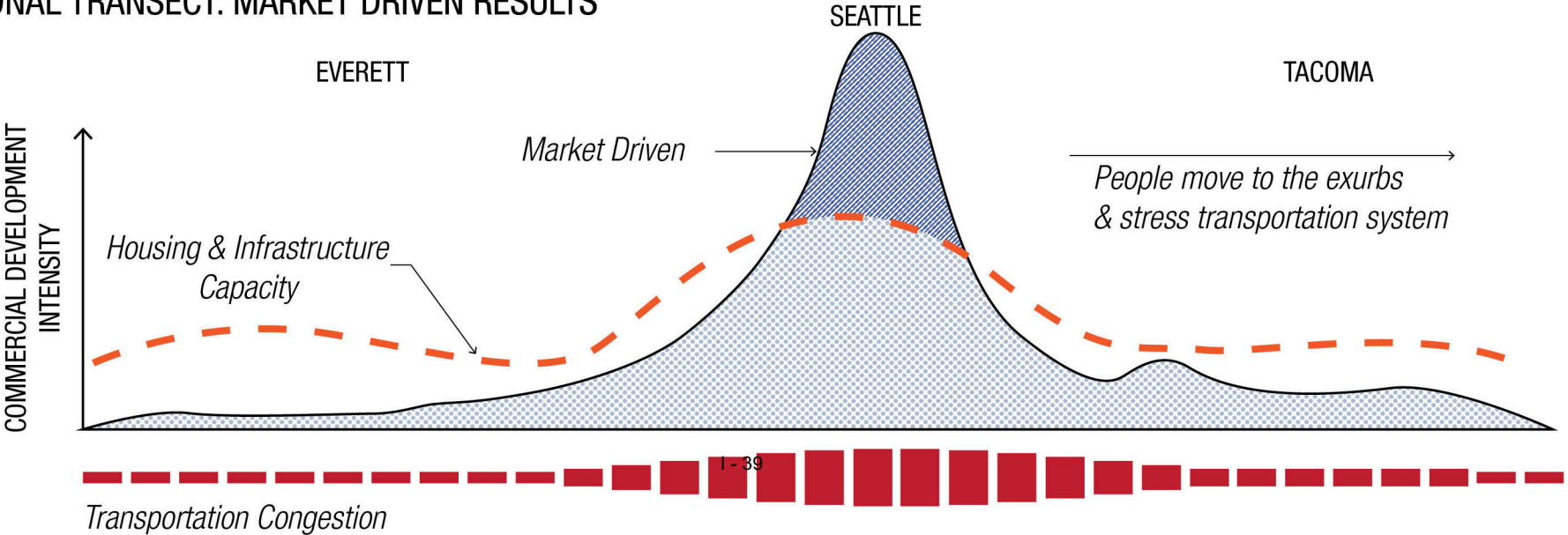
John Owen
Partner

MAKERS architecture and urban design LLP

REGIONAL TRANSECT: PLANNED



REGIONAL TRANSECT: MARKET DRIVEN RESULTS



Liz Underwood-Bultmann

From: Donald Padelford [REDACTED]
Sent: Monday, February 19, 2018 1:29 PM
To: VISION 2050
Subject: comments

- 1 The freeway HOV lanes should be converted to transit-express lanes (transit goes free, everyone else pays the “market clearing” price) to keep these lanes free of congestion 24/7/365. This largely solves the transit mobility problem.
- 2 PSRC needs to make preliminary studies of what happens once a good percentage of vehicles become self-driving. Does the capacity of the freeway system double? It seems possible.

Donald F Padelford
Seattle

Liz Underwood-Bultmann

From: Sandy Pernitz [REDACTED]
Sent: Saturday, February 10, 2018 9:24 AM
To: VISION 2050
Subject: Comment-Region plan

I would like to see something about affordability woven into the revised plan. As Seattle continues to become out of many residents reach in cost they are moving into other areas of the puget sound. Higher property values is a mixed blessing. I would hate to see what is happening in Seattle happen in the other cities in the region as they are absorbing people leaving Seattle in search of affordability but who do not have the high salaries but do needed work in the region. In addition, finding policies to protect the most vulnerable in those regional cities, such as older people who own there homes but are on a limited income. It makes sense to me to try and develop policies before it gets as bad as Seattle and real lives are affected.

and

I would like to see food policy intertwined with this document, planning for all parts of a regions food supply is just smart and should be considered in this plan along with the continued efforts to repair and protect the natural environment. This should include special zones to protect both urban and rural agriculture.

Thank you for taking comments

Sandy Pernitz
Bremerton, WA
[REDACTED]

Liz Underwood-Bultmann

From: Plummer David F. [REDACTED]
Sent: Friday, February 2, 2018 3:08 PM
To: VISION 2050
Subject: Growth Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Hi there!

Here are my comments on the Vision 2050 scoping document.

1. Reduce the population growth forecast (page 1) to 4.5million people in 2050.
2. Spread the population growth out further from the high density locations, and do the same for the job growth locations.
3. Develop a scenario that projects median house price growth at no more than 3.5% per year; include housing growth policies that encourage deployment of manufactured homes.
4. Include planning policies that limit high-density building heights to no more than 5 stories.

Regards,

David F. Plummer

Bellevue, WA

Liz Underwood-Bultmann

From: Posielski, Aleks <Aleks.Posielski@kingcounty.gov>
Sent: Tuesday, February 13, 2018 2:37 PM
To: VISION 2050
Subject: FW: Public input on VISION 2050

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Vision 2050,

I am passing along some feedback and input from one of Councilmember Lambert's constituents.

Thank you,

Aleks Posielski

Legislative Assistant | King County Councilmember Kathy Lambert
516 Third Ave, Room 1200 | Seattle, WA 98104
Office – 206-477-1003

This email and any response to it constitute a public record and may be subject to public disclosure.

From: David Ritchie [REDACTED]
Sent: Thursday, February 8, 2018 4:54 PM
To: CouncilDistrict3@subscriptions.kingcounty.gov
Subject: RE: Public input on VISION 2050

Thank you Kathy.

I must tell you that I am looking for property in Idaho. I can no longer afford to live here and I fundamentally object, on religious and personal freedom grounds, to pay for my County government to buy and supply illegal drugs (heroin) for addicts and / or for the County to provide places for them to inject themselves with these illegal drugs. Do our Federal laws not mean anything anymore? I gave 4 years of my life, during the Vietnam War, to defend my country (US Air Force). Government policy in the State of Washington, the City of Seattle, and King County make me regret having done that. After 24 years here you and the State and the Northshore School District have taxed me out of my home. Between my mortgage payment, the new \$12,000 / year property tax, the annual \$8400 health insurance payment to the State of Washington for the Uniform Medical Plan (government retirees health insurance, and the cost of owning an operating motor vehicles (gasoline taxes, tolls, skyrocketing registration and insurance), I cannot afford to live here on Social Security. Social security pays me \$26,000 / year. That does not even cover the cost of government to live here. Now Inslee wants a carbon tax and an investment income / capital gains tax to get at our retirement funds.

Enough is enough.

Best Regards

David Ritchie

Unincorporated King County [REDACTED]

From: Kathy Lambert, King County Councilmember [<mailto:CouncilDistrict3@subscriptions.kingcounty.gov>]
Sent: Thursday, February 8, 2018 4:37 PM

Liz Underwood-Bultmann

From: Posielski, Aleks <Aleks.Posielski@kingcounty.gov>
Sent: Tuesday, February 13, 2018 2:54 PM
To: VISION 2050
Subject: FW: Public input on VISION 2050

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Vision 2050,

I am passing along some feedback and input from one of Councilmember Lambert's constituents.

Thank you,

Aleks Posielski

Legislative Assistant | King County Councilmember Kathy Lambert
516 Third Ave, Room 1200 | Seattle, WA 98104
Office – 206-477-1003

This email and any response to it constitute a public record and may be subject to public disclosure.

From: David Ritchie [REDACTED]
Sent: Thursday, February 8, 2018 5:00 PM
To: CouncilDistrict3@subscriptions.kingcounty.gov
Subject: RE: Public input on VISION 2050

One other comment – with respect to this statement "... This plan will direct the vision for meeting the needs and livability of the area."

The livability of this area? Crime is through the roof. Traffic is awful, not just on the freeways. The work done on the Woodinville-Duvall road last year accomplished nothing. The bridge over the Snoqualmie River at Duvall is totally inadequate as is WA-203 through Duvall. Traffic backs up 3 miles from there in the afternoons. Avondale Road through Redmond is jammed thanks to Ron Sims approving the Novelty Hill developments. I could go on...

You want to add another million people to this county? Good luck with that.

Oh, maybe we can all walk from Cottage Lake to Microsoft so we can ride the light rail. Sound Transit's parking lots are already full.

Planning around here is a joke.

David Ritchie
Woodinville

From: Kathy Lambert, King County Councilmember [<mailto:CouncilDistrict3@subscriptions.kingcounty.gov>]
Sent: Thursday, February 8, 2018 4:37 PM

Liz Underwood-Bultmann

From: Posielski, Aleks <Aleks.Posielski@kingcounty.gov>
Sent: Tuesday, March 6, 2018 11:40 AM
To: VISION 2050
Subject: FW: Important Community Meeting on March 8 in Redmond

Here is some more feedback from one of Councilmember Lambert's constituents regarding the VISION 2050 plan.

Thank you,

Aleks Posielski

Legislative Assistant | King County Councilmember Kathy Lambert
516 Third Ave, Room 1200 | Seattle, WA 98104
Office – 206-477-1003

This email and any response to it constitute a public record and may be subject to public disclosure.

From: David Ritchie [REDACTED]
Sent: Thursday, March 1, 2018 4:56 PM
To: CouncilDistrict3@subscriptions.kingcounty.gov
Subject: RE: Important Community Meeting on March 8 in Redmond

You can't concentrate people into high density areas for two reasons.

1. The infrastructure to support these high density centers is never provided. Try driving in Seattle.
2. People don't want to live that way. That is why we live where we do.

Not too important to me though – you have taxed us out of our home. The sum of the property taxes I pay, the sales taxes I pay, and the State medical insurance I pay now totals more than our income. I just completed my Federal income tax work book. The cost of living here exceeds our income.

David Ritchie
Retired – Woodinville

From: Kathy Lambert, King County Councilmember
Sent: Thursday, March 1, 2018 4:06 PM
To: davidritchie@cablespeed.com
Subject: Important Community Meeting on March 8 in Redmond

Having trouble reading this email? [View it in your web browser.](#)

Liz Underwood-Bultmann

From: VISION 2050
Subject: FW: Form submission from: Contact Us

Liz Underwood-Bultmann, AICP | Senior Planner | Puget Sound Regional Council
1011 Western Ave Ste 500 | Seattle, WA 98104
206.464.6174 office | LUnderwood-Bultmann@psrc.org

From: Paul Inghram
Sent: Thursday, February 15, 2018 9:49 AM
To: VISION 2050 <Vision2050@psrc.org>
Subject: FW: Form submission from: Contact Us

From: Puget Sound Regional Council <website-no-reply@psrc.org>
Sent: Thursday, February 15, 2018 12:14 AM
To: Andi Markley
Subject: Form submission from: Contact Us

Submitted on Thursday, February 15, 2018 - 00:13
Submitted by anonymous user: 128.95.184.10
Submitted values are:

Your Name: Andrew Sang
Email: [REDACTED]
Question or Comment?
Dear PSRC,

I am writing to you today to ask you to consider the removal of Kent, Seatac, Burien, and Tukwila from the list of regional growth centers, and replace them with Shoreline, Lynnwood, and Mountlake Terrace. I think it's unwise for us to gather up the most people into regions in S. King, where there exists many super-highways and airports, including Sea-Tac which is one of the top 30 airports in the world in terms of air traffic. Concentrating our densest regions in the most polluted areas is in direct opposition to what zoning was initially established to do, which was to improve the living conditions of people by separating heavy industrial/polluted uses from residential/light commercial uses. We can house many people in better conditions on the light rail corridor and on the E-line corridor instead, which will have fewer negative public health impacts. Perhaps one day in the distant future, we could improve the highway 99 corridor to a more manageable and livable level, or perhaps even place a lid over I-5 near the station!

I hope you take this under advisement, and help create a healthier Puget Sound region.

Thank you,

Andrew Sang

Subject: FYI - comment in reply to Lakewood

It's on this [blog post](#).

- Reply to John Caulfield

[Permalink](#) Submitted by Andrew Sang on Wed, 2018-02-28 03:47

"The philosophy that economic growth and transportation funding should be concentrated into certain geographic areas (i.e., Regional or Metro Centers) needs to be questioned, and the opportunity to relieve transportation congestion and housing accessibility shortfalls by expanding investment in smaller jurisdictions and areas should be included in VISION 2050."

John, I understand your concern for the members of your community, however, respectfully, I believe this is the incorrect mentality to approach regional planning to the scale that the Puget Sound region is slated to grow. We're not talking about what we "want" to happen. I'd prefer it if the PNW could be frozen in a drop of amber today as well, but that simply will not occur. We've got to roll with the punches, and it's the broad consensus across the planning community that building densely near transit works. It allows more people to remain mobile without continuing to burden our beleaguered automobile infrastructure, and live healthier/happier lives to boot. I'm sorry Lakewood isn't able to get the funding it needs, and I frankly wish you the best of luck, but we've got to face facts here. We're not talking about haves/have nots, but rather just good planning.

PSRC should stay the course. There are a set of sustainable planning paradigms that need to be followed if we're going to weather this storm and maintain and improve the quality of life for all those who live in the Puget Sound Region. That includes building fewer highways, more high capacity transit, and more high rise housing near that transit. In fact, I would encourage PSRC to play a bigger role in these discussions. Public transit and land use are not stand alone subjects; they build off of each other. Conditioning PSRC dollars on good land use could make a lot of sense, and should at least be considered. We need strong regional leadership currently that is not swayed by local opposition if we are to address regional problems. John spoke of a development in Berkeley, and I think that's a great example of a project that needed far less local control. Local NIMBY interests reducing the scope of Transit Oriented Development and raising the number of parking stalls is exactly the opposite of what we need here in the Puget Sound Region at this moment.

Liz Underwood-Bultmann

From: Andrew Sang [REDACTED]
Sent: Monday, March 19, 2018 11:40 PM
To: VISION 2050
Subject: Vision 2050 comments

Dear PSRC.

I would urge you to pursue some better land use strategies in this plan. I believe it would be wise for our region to continue to advance and intensify our strategy of increasing housing near transit. Enclosed in this email is my planning wishlist.

First, I think that the PSRC should focus on developing additional housing in North King/South SnoCo region as well as the East Side, and divest housing development in the South King region. I think this is a wise choice to be making since South King has multiple superhighways, multiple small airports, and Seattle Tacoma International Airport, one of the top 30 busiest airports in the world. The public health effects of living close to airports and highways are severe and well documented. Airplane and car exhaust, brake and tire dust, and noise pollution are all extremely negative for quality of life as well as public health. I feel like we should be looking to preserve the current level of development in S. King, or even look towards reducing the capacity. Regions like Kent, Tukwila, Seatac, Burien, and Renton should have reduced public investment and see less housing construction.

Instead of building in South King, I urge the PSRC to push for more housing and investment into North King/South Snohomish, and the East Side too. Despite also having highways, the North King and Eastside regions do not have the airports like South King does, and the highways that do exist are of a much lower intensity. For example, Highway 99 can be tamed one day, I feel, and corridors like Wilberton/Belred can one day become great hubs like Seattle's various regions. Perhaps they'll even be able to qualify for [a lid](#), which I think would do great things for private investment, public health, and quality of life. Regions such as the Aurora corridor, and the regions around the Link Stations at Shoreline and especially Lynnwood should be focused for new housing. In fact, I think Lynnwood should get special attention due to the large amount of parking lots that exist in its downtown, making it an extremely cheap redevelopment target to supply the housing we need at affordable prices. I also think regions such as Northgate hold high potential for redevelopment, especially as Simon Malls has pitched redevelopment for Northgate mall. I hope that PSRC and the City of Seattle can work together to ensure that we get as much housing as possible from this TOD site, which may mean a very large upzone and other public investment into the region such as parks/maybe a lid?

Of special note, I think Highway 99 and Lake City Way (at least in the Southern Parts) can be tamed in a similar fashion to how the Lake City Way/125th St region has been upgraded for local livability. I wish PSRC can urge Seattle/Shoreline to upzone the two corridors and sharply improve transit there via additional funding. E line is our most ridden line, and improving that along with local livability down Aurora can, I feel, draw in the private investment necessary to turn this into our version of Wilshire Boulevard^[9].

I hope that PSRC can focus on creating more regions for new housing to be built near transit. For example, regions such as Wilberton, Issaquah, and Spring District certainly could use a lid for their freeways. I hope PSRC can be involved in funding the study and potential future construction of this. Furthermore, while this has simply been an idea in my head, I was hoping the PSRC could consider studying height/FAR *minimums* in these regions, to ensure that previous TOD land isn't relegated to lower land uses than is financially feasible. Perhaps this might be a way to get more VMU in places like Issaquah, albeit slower. I also think that regions surrounding HCT should be urged to massively upzone, perhaps less radically but still similar to what HB2711 wanted to do, and I hope PSRC can work with local municipalities to get that done. Maybe withhold federal money from them otherwise. I mean it should go without saying that we shouldn't be investing money into regions where few people can benefit from improvements, right? Finally, I hope that PSRC can work with

municipalities limit parking construction in regions surrounding high capacity transit. Lots of cars reduces livability, while parking construction increases housing costs. If we can reduce parking construction near where people have other options, we can do a lot for quality of life here.

In terms of land use, in general, I hope PSRC can move in a more sustainable fashion. That means reduced federal funding for new freeways and freeway expansion, ensuring that cars pay the true cost of what they owe for freeway use, working with the legislature to strengthen the GMA, studying changing Ballard, Northgate, West Seattle and Lake City to the same planning designation as the UDistrict, study changing SODO and Northgate into something akin to a new SLU, helping develop public transit in the Puget Sound Region, and finally proactive planning around potential future projects (ie de-zoning around future parks, transit stations, etc).

To summarize, I wish PSRC can:

- reduce housing development in regions including Kent, Tukwila, Seatac, Burien, and Renton
- increase housing development in regions surrounding transit in regions such as Lynnwood, Shoreline, Northgate, Aurora Licton, Lake City, Highway 522, Highway 99, BelRed, Wilburton, Issaquah, Bellevue, and Redmond
- work with local communities to upzone regions surrounding HCT
- consider studying and working with municipalities to introduce FAR/height minimums and parking maximums.
- reduce highway construction
- increasing the cost of driving until it's commiserate with its true cost (on society, both explicitly in the form of highway construction capital costs and implicitly in the form of health impacts, destruction of communities, urban sprawl)
- working with the legislature to strengthen the GMA
- change Ballard, West Seattle Junction, Northgate, and Lake City's planning designation to something similar to the UDistrict (I understand they lack the jobs to qualify, but that can be built for once they're upgraded. Ballard is already really close for example - it's only a fraction of the max permitted size for a growth area, and is immediately adjacent to Fremont which holds all the jobs Ballard lacks)
- study changing SoDo and Northgate into New SLU, given its great transit access

Thank you for all you hard work, and listening to the ideas of a crazy planning student. Best of luck with ensuring that Puget Sound remains the most beautiful and livable region in the world!

Andrew Sang

[1] Wilshire Boulevard - what our Aurora/Lake City Way could one day become



Liz Underwood-Bultmann

From: John Towers [REDACTED]
Sent: Thursday, February 8, 2018 8:03 PM
To: VISION 2050
Subject: My input on VISIOIN 2050 plan

Follow Up Flag: Follow up
Flag Status: Flagged

Potential focus areas for VISION 2050 could include housing affordability, social equity, resiliency, public health, mobility, and other issues of concern as the region grows.

Growth is a great thing, in my opinion, for any area. Increased growth means increased tax dollars to fund things we need in various areas. Increased growth, also means increased responsibility. What keeps me up at night is our public education. There never seems to be enough funding, and when school levies come around, there are many who can't vote because they are not citizens. I feel in this area, large businesses need to help fund public education in the future. It really isn't fair to have so many new people moving to an area, and put the tax bill on residents who have lived here their entire lives.

When it comes to housing affordability, we must stop foreign investors from buying up all the homes, only to flip them and make a huge profit. I don't feel we should give everyone hand outs for affordable housing, however, we must make things affordable. At the end of the day, each individual is responsible for their own success in our State and County. part of the issues with housing prices in our area is that there are many high paying jobs that can afford them. The fact is, not everyone has those high paying jobs. Everyone who is working should be able to afford an apartment. There are, however, many successful people leaving our state due to high business taxes, lease rates, and overall tax increases.

When it comes to social equity, we must put our money toward the things that are most essential. Everything else should come second. In my opinion, those essential things are roads, education, and health care. I guarantee the public will be OK with tax increases if they knew their money was going to essential things. The less we tax people for those secondary things, the more individuals can donate money to their special interest of choice. Special interests should not be forced on all tax payers.

Public health is something that is very near and dear to me. I have been a Chiropractor in Redmond, WA for the past 10 years. One things I have seen the past 10 years is health insurance premiums going up, and deductibles going up. What I also see is insurance companies making up confusing guidelines as to what they cover for various plans. Insurance companies must be more straight forward with what they cover or don't cover. The reality is that everyone should be responsible for their own health. We must not reward bad health decisions. We must have programs in place for people to get help in various areas. The biggest areas in need for programs are mental health and domestic violence. According to a King County Sheriff Deputy; the most common response is for domestic violence. Practicing healthy lifestyles goes a long way in not needing to use health insurance. However, for those times when it is needed, people should feel comfortable their insurance will cover what they say.

As our community continues to grow, we must do something with road improvements. I really feel the biggest thing we can do to help all issues, is look at where we are currently spending our money. Figure out those areas that are not a need, and only a want. "Needs" and "wants" can obviously be debated all day long. However, if you put it to a community vote on which things our area needs funded the most, I am confident it is public education and roads.

Thank you for taking the time to read over my opinions on the vision 2050 plan. I do appreciate the efforts in getting public input on this topic.

John Towers

--
[Redacted signature block]

Liz Underwood-Bultmann

From: Lael White [REDACTED]
Sent: Sunday, March 18, 2018 10:26 PM
To: VISION 2050
Subject: Scoping for Puget Sound Regional Plan

Please note herein my comments on the VISION 2050 Plan:

In addressing the population increase expected, we must rapidly transition away from fossil fuel energy dependence and move toward renewable energy and sustainable systems and products manufacturing.

We must develop jobs in renewable energy industry, and in all industry that serves the long term goal of sustainability in terms of a healthy ecosystem and healthy citizens.

Environmental protection and revitalization strategies:

Increase the planting of more native species of plants.

Increase planting more evergreen trees.

Develop "engineered wood industry",

Develop building materials from waste.

Stop removing forests and large trees for profit/development.

Stop logging to fund public schools.

Create incentives for residential, business, municipal, county, and rural applications of solar technology and other renewable energy industry (such as, look at putting solar panel roofing over parking lots).

Increase water supply systems. Study how will we sustain the water supply needed.

Increase available sewage treatment properties and study future demand and development.

Decrease toxic agricultural spray, wetland and groundwater pollution.

Incentivize small farming, organic farming, set and monitor standards with input from industry and consumers. Promote urban gardens, roof gardens, farmers' markets.

Decrease traffic congestion; legislate, fund, and implement more frequent transit, including more passenger rail infrastructure and service (BC to Portland, Seattle to Spokane and connections for passenger and light freight. I DO NOT RECOMMEND ULTRA HIGH SPEED RAIL.

Develop and study electric vehicle technology including study the impact on electric grid, and need for battery storage and toxic disposal and need for more charging stations, and incentives for low income buyers. Merely putting EV's on the road will not reduce traffic congestion. For this, we MUST improve rail service.

Restoration of natural urban environments such as the Edmonds Marsh, and urban environment innovations such as the Thornton Creek watershed renovation, to manage erosion, increase naturalization, habitat restoration etc. and blend the many beneficial effects of natural environments with well-managed development.

Economic development and revitalization of communities across the income spectrum:

Development must include wage incentives, access, and benefits for all residents including low and middle income earners and including strategies for re-entry for previously incarcerated persons.

Jobs development also requires access to training in the trades and higher education at affordable tuition rates, with equitable lending practices and speedy transition from training to jobs.

High standards in education and trades with mentorship, apprenticeship programs that ensure high levels of competency.

Increased basic education facilities and increased teacher pay will incentivize excellence and student competency.

Reduce homelessness and find solutions for homeless population.

Adopt rent control policies and laws and affordable housing.

Prioritize the preservation and renovation of older buildings rather than new construction.

Incentivize bringing jobs back home with optimal educational access, land use, housing, and transportation planning.

Provide higher wages, raise minimum wages according to cost of living.

Employ more nurses and increase their pay.

Maintain and improve disabled living and services. Increase access.

Increase affordable senior living.

Economic development must prioritize transition to renewable energy and sustainable industry.

Decrease bureaucratic waste in insurance, public agencies, CEO wages and bonuses.

Pass I-1600 Universal Health Care to save citizens tons of money and provide care to all citizens regardless of income

Pass a state income tax plan that allows lower income citizens to prosper in a growing economy that benefits everyone and allows higher earners to invest in the public good.

Lael White

32nd LD Democrats Environment Caucus

WSDCC Environment Caucus

North Seattle Progressives Environment Team

Sierra Club

VISION 2050 COMMENTS

- “Homeless problem:”

The homeless population of King County is one percent of the population in general. As the population grows, given current conditions, the homeless population can be expected to grow. However, the homeless population, under current conditions, can be expected to grow at a rate higher than the general population. Growth in manufacturing, warehousing, and distribution can be expected to be substantially automated, providing minimal employment, probably much of which will be low wage employment. There is even a movement toward automation in transportation. Few businesses will be unaffected by automation.

A substantial part of the county’s employment is in the secondary economy, service businesses. As the primary economy shrinks due to automation, the secondary economy will also disappear.

The “homeless problem” must not be one of finding a place to store homeless people, the current approach. The homeless problem must be addressed by the elimination of homelessness. Affordable housing for people earning secondary economy wages will not be sufficient as the secondary economy shrinks.

The 2050 plan must address employment growth opportunities. Delineating land for business will not be sufficient. The vision must include an economic plan that will support a healthy secondary economy. That may include expansion of education facilities; however, education alone will not fully address the problem, as the tech sector is automating as well. The approach may be one of increased public sector employment.

- Water and Sewer

- Transmission and treatment: Much of the water supply, sanitary sewer, and storm sewer systems are very old. Parts of the systems are obsolete. Increased population and development will not only require additional infrastructure, it will put additional stress on the already very old existing systems. Provision must be made to renew existing systems as well as add new infrastructure.
- Supply: The plan must ensure an adequate water supply for the expected population. The prospective sources. Consideration must be given to the potential effects of climate change on water supply. The regional water supply depends upon snowpack in the Cascades. As weather patterns change unseasonably, which can be expected to occur with greater frequency, the rainfall and snowpack needed for the region’s water supply may fall short of the requirements for the increased population.
- Disposal: Increased population will necessitate substantially increased treatment capability. Sufficient land for additional wastewater treatment must be reserved.

- Solid waste: The increase in population will generate a substantial increase in the production of solid waste. The increase in solid waste will generate the need for additional trucks for collection and an increase in the footprint needed for transfer facilities. Transfer facilities will require improved or additional road access and queueing lanes.

At first glance, recycling appears to be responsible policy. However, recycling involves the transport of waste. That waste is then processed in some way, using additional energy. A policy of reducing waste material, even if that material is recycled, by reducing excessive packaging, and re-use rather than recycling of appropriate items, such as glass containers.

- Electricity

As the transition away from fossil fuels continues, the demand for electricity will be greater. Increased population will further increase the demand beyond that caused by the transition to sustainable energy.

- Distribution: Conversion to sustainable energy will create a substantial increase in electricity demand even before the effects of increased population. The additional load can require substantially larger transmission lines and substations.
- Generation: Consider distributed, non-conventional power generation. Vertical axis turbines can be mounted on line poles, light poles, and other locations. Rooftops can be covered with solar panels. Parking lots are a substantial dedicated use of land. Parking lots may be roofed and used for solar energy collection. There must be an economic plan for energy development. Individual private property owners will not be able to develop sustainable facilities using personal resources. Small commercial users may also not be able to develop sustainable energy generation from business resources.

- Transportation

- Profusion of rideshare vehicle: Rideshare vehicles and Amazon instant delivery vehicles are responsible for substantial increase in congestion on the streets of some large cities. They are also responsible for decline in transit ridership. The Uber business model includes flooding the streets with vehicles, reducing income opportunities for rideshare and taxi drivers while ensuring a substantial income stream for the corporation. Heretofore, jitney taxicabs were illegal in many cities because of the competition with transit and the congestion caused by the profusion of such vehicles. Rideshare service vehicles add needlessly to the road congestion of the region. Appropriate regulation must be considered and enacted.
- Electric road vehicles: Fossil fuels are generally perceived to be the greatest problem related to automobiles and trucks. There is a perception that the conversion of all road vehicles to electric traction will solve the most significant problem facing the region. However, there are three substantial effects of merely converting the existing and growth fleets of road vehicles to electric traction then continuing the profusion of road vehicles as electric instead of gasoline or diesel vehicles.
 1. Highway construction has not been able to stay ahead of the profusion of road vehicles. Road improvement projects are continual but traffic congestion increases nonetheless. Freeway breakdown lanes and arterial parking are removed in favor of traffic lanes to no avail. If population increases considerably without substantial alternatives, congestion and the percentage of land dedicated to automobile operation and storage will continue to increase.
 2. Electric vehicles are rare. Electric vehicles have been readily available to the public for a relatively short time. Battery disposal has not yet become a problem. By the 2050 horizon, one or two generations of electric vehicles will have become obsolete. About one third of the battery of an electric vehicle can be reused/recycled. The remainder is just waste. Part of it is hazardous waste. Profusion of electric vehicles in lieu of profusion of gasoline or diesel vehicles will result in a new profusion of waste.
 3. Rubber tires on pavement encounter about ten times the friction of steel wheels on steel rails. As a result, highway vehicles need over twice as much energy for propulsion as rail vehicles. Therefore, the mere conversion to electric vehicles and continuing their profusion will require a substantial increase in electric power generation compared to the power needed if a substantially greater component of mobility were to be electrified rail transit (light rail, heavy rail, commuter rail).

The region must be much more serious about developing transit, particularly electrified rail transit. The ST3 program which should be providing transit for today's problems will not be complete for 23 years. That is unacceptable. The scope of the Seattle streetcar should also be substantially expanded substantially to include heavily traveled arterials throughout the city within a relatively short period, certainly commencing within ten years.

- Autonomous vehicles: Autonomous vehicles, particularly electric autonomous vehicles, have been promoted as the solution to traffic problems. In the 1950s, those promoting the Interstate Highway System produced movies depicting the empty, 100mph+ highways of the future. We are now in that future. It doesn't look like what we were promised. Autonomous highway vehicles are being promoted for the benefit of those selling autonomous highway vehicles. Those vehicles will need substantially better maintained roads: clearly defined lane striping, uniform signage, and in some cases, intersection redesign to avoid confusion. Those promoting autonomous vehicles assume that appropriate roads will be provided by someone for their products. No accommodation should be made for the claimed road capacity increase promised by those selling autonomous vehicles. The promises of congestion-free high speed expressways has not come to pass, despite continual construction. Today's planners should not make assumptions that autonomous highway vehicles will substantially reduce the roadway requirements of the increased population of the future.
- Truck parking: The trucking industry has strict hours of service limitations and electronic logs to aid enforcement. When legal driving time expires, the truck must be parked until the end of the legal rest period. Before the current regulation and the electronic log mandate, drivers would drive as far as needed to a place where the truck would be parked and adjust the log entries as necessary to make the driving time appear to be legal.

Communities find parked trucks to be a nuisance. It is generally prohibited. Shippers and receivers don't want trucks parked for rest in their facility. Legal truck parking opportunities are limited. Commercial zones in the region. As well, electric charging opportunities must be similarly located. The range of the best available electric semi-tractor is substantially less than the range of a typical diesel tractor. That combined with the hours of service rules present substantial difficulties for commercial trucks.

- Pedestrian accommodation: With current road traffic and congestion, being a pedestrian can be challenging and even dangerous, particularly along and crossing multiple lane arterials. The situation will be exacerbated by the expected population growth. Careful consideration should be given to grade separated pedestrian crossings.
- Public open space: Open space is important for the psychological well-being of the population. Small tree and grass areas are insufficient. Easily accessible outdoor recreation areas for sports, games, dog activity, and even horseback riding must be available for the population at in general. A shortage of universally accessible open space can have an adverse effect on the general health and crime level among the population.
- Private open space: As higher density development succeeds single family residential areas, and as population grows within dense development, provision must be made for private open space for private recreation, relaxation, and gardening. For some, a patio outside of a high rise apartment is sufficient, but for many it is not. Public spaces should be made available to be subdivided into private use spaces for those who live in high density development.
- Climate
 - Extreme weather: Climate change is generating wildly unpredictable and extreme weather patterns. The region must be prepared for extreme rainfall events, extreme snowfall events, and extreme low and high temperature events, and drought.

- Sea level rise: Sea level rise is occurring and will continue for the foreseeable future. The effects of sea level rise will be exacerbated along the Puget Sound shorelines by onshore winds during extreme weather events. The ability to counter the effects of these events will be limited. Land use planning must allow sufficient provision to avoid or substantially mitigate the effects of these events.
- Green rooftops: Most of the developed Puget Sound region is covered with roads, parking lots, or rooftops. Air quality depends upon the absorption of carbon dioxide and generation of oxygen as a product of the photosynthesis process. Cities have been demonstrated to develop their own weather patterns because of the enormous heat storage and reflective surfaces.
- Accessibility: In thirty years, the “baby boomers” will be approaching 90 years old. Many of their children, “Generation X,” will be approaching 70 years old. Development planning must include a substantial population of mobility-impaired individuals. This population will be substantially dependent on mass transportation, which should be in place before the need arises. Current transit plans are inadequate for this need.
- Rural / natural land areas: Preserve existing rural and natural areas. Prevent further encroachment of urban development into such areas.

Thomas White

[REDACTED]

Mountlake Terrace WA 98043

[REDACTED]

Liz Underwood-Bultmann

From: Dorian Yeager [REDACTED]
Sent: Saturday, February 24, 2018 10:36 AM
To: VISION 2050
Subject: VISION 2050 plan

Hello!

I appreciate the opportunity to comment on the future of our region!

My personal thoughts are that we MUST manage growth, in terms of jobs and housing, to disincentivize sprawl, and incentivize high density housing, to include that for lower income individuals. We continue to spend vast amounts of money on improving our road system to handle increased, at the same time spending vast amounts of money trying to get people out of their cars, because they are living further and further away to get into cheaper housing.

Our only hope of achieving a balance of mobility, reduced congestion, and affordable housing is to change the thought process away from generating tax revenue for local governments through new housing developments in our previously rural areas. We have to go to a region that is based on dense urban areas (as is common everywhere else in the world where mass transit works, and is used) that are linked via efficient public transportation. We cannot continue to spend money making the problem worse via larger and larger roads.

The side benefit of this will be less impact to the streams and forests that our wildlife depend on. There is zero balance available in the current system. Open space is nearly worthless in terms of generating tax dollars, thus open spaces, and ultimately wildlife, such as salmon, lose. And we then spend billions trying to mitigate the problems caused by our inability/inaction to control sprawl.

I have lived here my entire life. We will never go back to what it was 40 some years back. But if we don't do something, we WILL end up the same as southern California, and no one wants that. I believe that by changing regulations, and providing some sort of incentive to increase density (much taller structures for instance) we can avert much of what is coming. It doesn't mean we have to tax the heck out of ourselves to do it. But there must be a way to encourage, without forcing, developers and consumers, that high density housing is worth it.

Thank You,

Dorian Yeager

Comment Letters on VISION 2050 Scoping

The Puget Sound Regional Council sought public input on scoping for the VISION 2050 plan and SEPA environmental review from February 2 through March 19, 2018. Background information on the project and public comment period is available on the [project webpage](#).

The comment letters are organized by commenter affiliation - [Organizations & Agencies](#), [Individuals](#), and [Listening Session Comments](#) are available in separate files.

Jurisdictions	Page
Bonney Lake	2
Bremerton	5
Carnation	6
Des Moines	8
Duvall	10
Everett	13
Federal Way	16
Gig Harbor	18
Issaquah	21
Kent	23
Kitsap County	25
Lake Stevens	29
Lakewood	32
Monroe	36
North Bend	39
Pierce County	42
Port Orchard	45
Seattle	51
Shoreline	55
Snohomish County	56
Snohomish (City)	60
Snoqualmie	63
Steilacoom	66

March 16, 2018

Puget Sound Regional Council
Attn: VISION 2050
1011 Western Avenue
Suite 500
Seattle, WA 98104



RE: VISION 2050 Scoping

To Whom It May Concern:

The City of Bonney Lake, appreciates the opportunity to provide input the *VISION 2050 Plan and SEPA Scoping Notice* prepared by PSRC to guide the *VISION 2040* update. The City has prepared the following comments for PSRC's consideration as PSRC works to develop *VISION 2050* and prepare the Draft Supplement Environmental Impact Statement (DSEIS) to address the significant environment issues accompanied by the shift towards a more compact urban area:

- The City supports the current strategy of containing urban sprawl and directing future growth to existing urban growth areas, supported by an efficient, multi-modal transportation system, with high capacity transit connecting designated regional and county-wide urban centers.
- In updating VISION 2050, PSRC should reevaluate the regional geographies, which serves as the bases for distributing future growth throughout the region. The City believes that PSRC should consider other factors that cut across municipal boundaries when establishing regional geographies instead of simply relying on a jurisdiction's total employment and population size. Other factors that PSRC should consider include distance from a Metropolitan Center, financial capacity to handle future growth, distance from existing or planned high capacity transit networks, the size of the unincorporated urban growth area (UGA) surrounding a city, willingness to handle future growth within existing incorporated boundaries, and existing and planned regional and countywide centers.
- It preparing VISION 2050, the City believes that it is important PSRC to recognize the significant differences in the regional real estate market and economic forces within each county, and how these forces affect the likelihood for job and population growth.
- Given that transit is critical to the implementation of VISION 2050, PSRC should evaluate the impact and identify practical solutions as the result of the lack of general transit services and proposed high capacity transit in the south and eastern portions of Pierce County as illustrated on the figure labeled Planned Regional Transit System 2040 on page 9 of the scoping document. These practical solutions could include a change in state law regarding how areas within the UGA are added to a transit district. A large portion of the Pierce County's UGA is

Justice & Municipal Center:
9002 Main Street East
Bonney Lake, WA 98391
Fax (253) 862-8538

Public Safety Building:
18421 Veterans Memorial Dr E
Bonney Lake, WA 98391
Fax (253) 863-2661 J - 2

Public Works Center:
19306 Bonney Lake Blvd.
Bonney Lake, WA 98391
Fax (253) 826-1921

Senior Center:
19304 Bonney Lake Blvd.
Bonney Lake, WA 98391
Fax (253) 862-8538

not within a local transit district and the current process to join a transit district is hurdle and significantly impacts the ability to provide transit services within the UGA.

- In 2008, PSRC said the growth figures were provided as “guidance,” to be used as a starting point that would likely have to be adjusted over time. However, during the 2015 periodic update process these growth figures were interpreted as growth ceilings for small cities. The City believes that growth targets should be the minimum amount of growth a local jurisdiction should plan for rather than the maximum, which does more to achieve the goals of the Growth Management Act and is consistent with the decision in the Central Puget Sound Growth Management Hearings Board case *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 request that PSRC evaluate the environmental impacts associated with the loss of the existing tree canopy within the Central Puget Sound Region as more of the land within the UGA is developed to support the expected population and employment growth. The ornamental landscaping associated with new development will not replace the environmental functions associated with the existing tree canopy in the region.
- The built environment significantly affects the public’s health and the way in which the regions plans to address the future growth and increasing urbanization of the Puget Sound Region will impact the region’s physical and mental health. Land-use and transportation decisions influence public health outcomes both through encouraging healthy behaviors and improving environmental qualities (e.g. increasing physical activity; ensuring access to healthy food; improving land, air, and water quality; strengthening the social fabric of a community; providing fair access to livelihood, parks and nature, transportation and housing choices, education, etc.). Therefore, as part of the scope of the DSEIS, PSRC must include and Health Impact Assessment to understand the health implication of the planning decisions that will be made as part of VISION 2050 and identifying appropriate mitigation strategies to address these impacts.
- Since the inception of GMA, local governments have suffered significant reductions in state grants for long range planning efforts. Therefore, any additional planning requirements established by VISION 2050 must acknowledge that cities and counties have insufficient resources to fully address long range planning issues adequately until there is a change to state law to provide a revenue stream for local governments to fund long range planning efforts.
- The City is concerned with the compressed timeline between the adoption of VISION 2050 and the next required periodic update. This will give cities and counties three years to update the Countywide Planning Policies, establish the actual growth targets for cities within each county,

and update their local comprehensive plans. Additionally, the release of new county wide population projections by Office of Financial Management and the decennial census data for the United State Census Bureau in 2022 will significantly add to this complexity within an already compressed plan update timeframe. PSRC should work with the state legislature to delay the next periodic update until 2025 and then establish a ten year cycle instead of the eight year cycle for the periodic update in the Central Puget Sound Region. This would ensure that the planning efforts in the future continue to be synchronized with the update schedules for PSRC and the release of OFM projection and the Federal Census data.

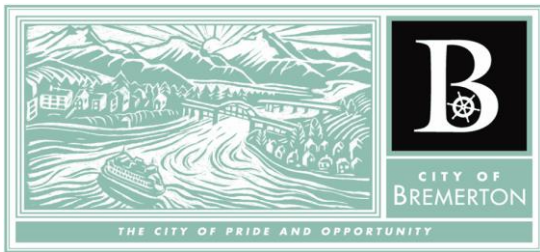
If additional information is needed, please contact the City's staff lead: Jason Sullivan – Planning and Building Supervisor. He can be reached by phone at (253) 447-4355 or by email at sullivanj@ci.bonney-lake.wa.us.

Sincerely,

A handwritten signature in dark ink, appearing to read "Neil Johnson Jr.", with a stylized, cursive script.

Neil Johnson Jr.
Mayor
City of Bonney Lake

Email Copy: Don Morrison – City Administrator
John P. Vodopich – Public Services Director
Jason Sullivan – Planning and Building Supervisor



Mayor Greg Wheeler

greg.wheeler@ci.bremerton.wa.us
Tel 360-473-5266
Fax 360-473-5883
345 6th Street, Suite 600
Bremerton, WA 98337-1873

March 19, 2018

Puget Sound Regional Council
Attn: Vision 2050 Comment
1011 Western Avenue, Suite 500
Seattle, WA 98104
Email: VISION2050@psrc.org

RE: PSRC's Vision 2050 Scoping

Thank you for this opportunity to comment on the scoping for PSRC's Vision 2040 Update (Vision 2050). The City is supportive of Vision 2040 and its identified regional growth strategy. The City urges PSRC to continue building on the vision established by Vision 2040. The City believes that the fundamental principles and policies of Vision 2040 continue to Vision 2050, with the following concepts taken into consideration:

1. *Continue to address regional equity between the four counties.* PSRC is comprised of the four counties; each county varies and is unique. Vision 2040 talks about recognizing local circumstances and therefore the City requests that when revising or adding policies into the update, that the plan continue to consider all the different jurisdictions and the impacts that the policies may have on all the communities (large or small). This regional equity should also be considered in regards to available resources so every jurisdiction has access and opportunity to improve and grow responsibly.
 - a. To build on that suggestion, PSRC should consider how existing and new policies will affect scoring criteria for jurisdictions AND how policy decisions will impact local government resources (example: can jurisdictions afford to implement the cumulative policies?).
2. *Additional items listed in the Scoping Notice as "potential issues".* Part of the scoping mentions additional issues to consider that PSRC assumes the public will attest to, including housing affordability, economic inequality; social equity and access to opportunity, climate change adaptation, demographic shifts, etc. All these topics are important to consider and these are issues that most jurisdictions are currently or planning on working through in their public process. As PSRC is the regional voice, the City would like the support and guidance of PSRC to assist in these multifaceted issues, especially identifying additional tools, best practices, and resources available to address such topics.

The City appreciates the efforts that PSRC has already taken to get the word out on this important update. The City felt prepared to comment on this scope of work after the informative handout and the well-attended scoping meeting in Bremerton on February 27. We look forward to this public process.

Sincerely,

Mayor Greg Wheeler



March 16, 2018

Erika Harris, AICP, Senior Planner
SEPA Responsible Official
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104

RE: Vision 2050 Scoping

Dear Ms. Harris,

The City of Carnation and all the Snoqualmie Valley cities are asking for support for the Vision 2050 Plan to acknowledge our cities as urban entities with the same growth impacts that all Puget Sound urban communities are experiencing. We need the Vision 2050 Plan to recognize the share of growth that the State mandates for Carnation.

The City of Carnation would object to any classification of cities (e.g., small vs large) which is different than the Growth Management Act. Carnation is an “urban growth area” or UGA and as such needs to operate under the same rules as any other UGA City in the state. We are mandated by the GMA to deliver costly urban services like water and sewer and thus we can’t be restricted or treated differently than any other UGA City, be it large or small. Further we object to any language in the plan that interferes with the City Councils exclusive land use decision making process as much of Vision 2040 attempted to do just that (e.g., limits on employment centers and growth forecasts for small cities).

Policy and actions coming from King County and PSRC have advocated that growth should not be directed or allowed in the “rural” cities of the Snoqualmie Valley, but rather should be directed to the urban core of Puget Sound. This not only discriminates against our cities, but is inconsistent with the Growth Management Act and negatively impacts all the Valley cities with respect to our comprehensive plans, compliance with the GMA, grants, and many other tools offered to cope with growth and fiscal wellbeing.

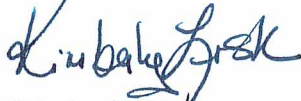
The VISION 2050 Plan should recognize the City of Carnation, our neighboring Snoqualmie Valley Cities, and similar Cities in the region for their historic and projected growth rates that we have and will experience. The Vision 2050 Plan should endorse employment and growth opportunities in our communities to create more job/housing balance and transportation

Ms. Erika Harris, AICP
March 16, 2018
Page 2

opportunities. As such, we should be included in planning for the orderly growth and granted the allocation of resources to serve our development that is in step with the rest of the Puget Sound region.

The Valley cities along with the City of Carnation should be entitled to the allocation for growth and resources to cope with growth that we are likely to experience as a part of the robust economy in the Puget Sound area.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kimberly Lisk", written over a horizontal line.

Kimberly Lisk
Mayor



March 19, 2018

Erika Harris, AICP, Senior Planner
SEPA Responsible Official
Puget Sound Regional Council
1011 Western Avenue
Suite 500
Seattle, WA 98104

RE: Vision 2050 Scoping

Dear Ms. Harris,

The City of Des Moines appreciates the opportunity to comment on the scoping of Vision 2050 and the associated environmental review.

The City of Des Moines appreciates the important work of the Puget Sound Regional Council and is supportive of including consideration of 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 Vision 2050 and the associated environmental analysis.

The City's concerns relate primarily to the evaluation of impacts related to regional aviation planning and our City's proximity to SeaTac Airport. 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 considerations 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.

The Waterland City

Erika Harris, AICP, Senior Planner
Page Two
March 19, 2018

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, etc. is an essential component of the regional transportation system, and is a constraint on future airport capacity, expansion and 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,



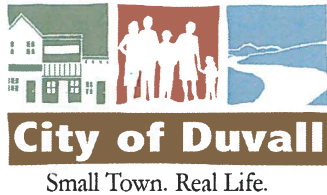
Matt Pina
Mayor



Michael Matthias
City Manager

cc: City Council
Aviation Advisory Committee
Dan Brewer, Chief Operations Officer
Susan Cezar, Chief Strategic Officer
Lance Lyttle, Managing Director, Port of Seattle Aviation Division
City Managers and SEPA Officials – Cities of Burien, SeaTac and Normandy Park

The Waterland City



Office of the Mayor

March 15, 2018

Erika Harris, AICP, Senior Planner
SEPA Responsible Official
Puget Sound Regional Council
1011 Western Avenue
Suite 500
Seattle, WA 98104

RE: Vision 2050 Scoping

Dear Ms. Harris,

The City of Duvall appreciates the opportunity to comment on the scoping of the proposed environmental review for Vision 2050.

After reviewing the VISION 2050 SEPA Scoping Notice, the City of Duvall recommends the scoping include investigating the following issues.

1. **Directing Growth:** The City of Duvall would like to have a clear understanding and clarification of the process for future growth target allocations by King County and how they will be implemented by the Puget Sound Regional Council. The last round of Comprehensive Plan certifications caught small cities off guard. Previously allocated targets were explained by King County as neither a “floor or a ceiling”. Many small cities planned for additional growth and completed infrastructure to accommodate that growth. Duvall desires to plan for future growth consistent with King County policies and the goals of the Growth Management Act but wants to be at the table during the process and respectfully requests being actively engaged in the process and discussions for future growth within our community and the region.
2. **Jobs:** Vision 2050 should also include allowance for a greater availability of commercial/industrial land in Large Cities. Increasing land values and development trends are pushing traditional blue-collar jobs out of the greater Seattle area. The scope should account for capturing these jobs in Large Cities to ensure they stay in the Puget Sound region.
3. **Transportation:** Regionally, providing transportation services for stand-alone cities like Duvall is a constant challenge. It is understood areas along the I-5 corridor contain

greater density and results in greater ridership; however, there is still the need for an equitable transportation system throughout the four-county region.

In addition to King County Metro, we recommend the scope include review and inclusion of smaller transportation systems like Snoqualmie Valley Transportation.

Transportation systems like this provide the flexibility needed to service these standalone cities and rural routes.

As the scope relates to roadways, we encourage PSRC review the need to upgrade and dedicate funding to SR 522 (capacity projects) and SR 203 (safety projects). As development continues in Duvall and surrounding jurisdictions, US 2, SR 522, and SR 203 are experiencing increased congestion, an increase in major collisions, and significantly longer commute times. For example, the completion of SR 522, Phase 1, constructed additional capacity to serve communities but left an existing stretch with the original two lanes midway between Monroe and Maltby. The current configuration of SR 522 creates a bottleneck of congestion and negates the work completed under Phase 1. Also, Duvall encourages the PSRC consider funding a SR 203 Corridor Study to identify existing trips, future trips related to growth in Snohomish County and the Snoqualmie Valley communities, diversion trips from SR 522, the impacts of tolling on the SR 203 corridor, and future safety improvements.

In general, additional safety and capacity projects on Woodinville-Duvall Road and other major arterials need to be considered and funded that connect the urban corridor with the suburban communities of East King County.

4. Sustainable funding for cities: With the limits of the 1-percent property tax initiated by I-747 and subsequently voted into law by the State legislature, cities and counties continue to suffer the financial impacts created by this law. We request the scope include reviewing the financial sustainability of local jurisdictions as it relates to implementing GMA and VISION 2050. Duvall is a bedroom community that relies on property taxes to serve our community.

During the 2015 update, the City of Duvall spent approximately \$250,000 revising the Comprehensive Plan. The City dedicated this time and money because it had the resources and understood the importance of long range planning. However, if the 2015 update took place in a depressed economy, the City would have struggled to meet the basic update requirements of GMA.

5. Growth Targets/Buildable Lands Analysis: Over the years the purpose of growth targets has evolved and changed and recent legislation suggests the buildable lands analysis methodology will be changing.
 - a. The environmental review should consider how the impacts of growth targets that act as precise growth assignments differ from the impacts if the targets are viewed as aspirational goals. Understanding the difference would help decision-making related to implementing the targets.
 - b. Recent legislation suggests the scope of the required buildable lands analysis will be increasing. The environmental review should address how this increased scope may affect the determination of an area's capacity to accommodate growth. The review

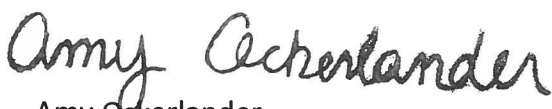
should look at whether an increased buildable lands analysis scope will eventually have impacts of its own on permit processing timelines, the provision of affordable housing, and more. In addition, the recent legislation also suggests that more attention needs to be paid to the timing of when growth is anticipated to occur relative to market trends and key infrastructure investments. The review 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 better understood.

6. Water Resource Planning and Resiliency to Climate Change: PSRC should include in its scope water resource planning and resiliency to climate change analysis. Many of our communities are reliant on other water purveyors for drinking water. Western Washington has grown at an unprecedented pace. Our valley relies on water for fish, farms, and people. What is the long-term capacity of our existing regional water resources and will that change as the climate changes?
7. Critical Areas: PSRC should recognize that overlapping goals or direct conflicts exist between various planning documents, state regulations and rules of individual state/federal agencies as it updates the regional growth strategy. The environmental review should analyze the impacts of these conflicts and provide guidance for resolution and mandatory coordination.

A primary goal of the Growth Management Act is to focus population and job growth in urban areas; however, the continuing trend of agencies adopting ever increasing and more stringent environmental regulations significantly diminishes an urban area's capacity to accommodate new growth. Surface water management and wetland regulations have the unintended result of decreasing available developable areas, as identified in applicable buildable lands reports. Consequently, this diminishes the ability of local jurisdictions to plan for new households and jobs without significantly intensifying density and scale of development, in a manner that may be contrary to the local culture or community desires.

The scoping must consider increased and meaningful coordination between the Washington State Department of Commerce, Puget Sound Regional Council and the Department of Ecology to address conflicts created in implementing the Growth Management Act, regional growth strategy and buildable lands reporting.

Sincerely,



Amy Ockerlander

Mayor – City of Duvall



OFFICE OF THE MAYOR

March 8, 2018

Cassie Franklin

Erika Harris, AICP, SEPA Responsible Official
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104

SUBJECT: Vision 2050 Update Process Scoping Comments

Dear Ms. Harris,

The City of Everett appreciates the opportunity to comment on the scope of the Vision 2050 update and extension of the Vision 2040 Regional Growth Strategy ("RGS"). We understand that the horizon for the RGS will be extended to 2050, and that updated population and employment growth targets will be established with Vision 2050.

The City would like to thank the PSRC staff for meeting with planning directors representing local governments in Snohomish County prior to developing the scope for the plan update. This courtesy assisted with our collective understanding, and allowed Snohomish County Tomorrow ("SCT") to focus on the issues raised in the December 7, 2017 letter from SCT to the Puget Sound Regional Council ("PSRC") regarding the scope of the Vision 2050 update. The City of Everett fully supports the comments in the December 7, 2017 SCT letter.

Based on previous conversations with PSRC staff, we want to clarify the City of Everett's position on the growth guidance / targets initially established in the current RGS. Everett does not oppose the magnitude of the 2040 population and employment growth numbers. As the Metropolitan center of Snohomish County Everett views our region's growth and prosperity as an incredible opportunity for our community.

Our caution is that without more rapid economic growth than we have experienced since 2000 the current growth guidance / targets will likely continue to prove unrealistic, as was reflected in the SCT 2017 Growth Monitoring Report. We believe growth guidance / targets for 2050 should be based upon a realistic assessment of underlying economic assumptions for Everett and the region.

The City of Everett offers the following additional comments for your consideration as the PSRC finalizes the scope for the Vision 2050 update:

1. Growth Assumptions and Targets: We realize that the counties are responsible for setting growth targets, but our past experience has been that the PSRC growth guidance has been viewed as hard and fast targets with no room for modification.

Request: State that the purpose of the growth guidance in the Vision 2050 update is to help local jurisdictions set growth targets, and acknowledge that Vision 2050 growth figures are based upon regional aspirations and other assumptions that local jurisdictions have very little ability to control. It would also be very helpful to state that local jurisdictions are not required by law to realize the aspirational targets, just to provide sufficient land capacity and zoning to accommodate their adopted growth targets.

2. We believe that shifting a higher volume of growth to Everett is, in part, dependent on fundamental assumptions that are beyond Everett's control, including:

- a. The timing of the extension of light rail to Everett.

Request: Identify the extent to which the growth assumptions Vision 2050 uses for Everett are predicated on the timely extension of light rail to Everett.

- b. The maintenance of the existing urban growth area boundaries.

Request: Identify the effect that different Vision 2050 alternatives will have on the capacity to expand urban growth boundaries and develop on greenfield sites, and the likelihood for infill redevelopment in existing urban growth areas.

- c. Homebuyer preferences for single-family detached homes. Since there is limited capacity for additional single-family detached housing in Everett, homebuyers will not have significant opportunities to purchase new single-family homes in Everett.

Request: An estimate for each Vision 2050 alternative of the number of housing units by type (single-family detached, multi-family, etc.), tenure (owner-occupied, rental), based on projected household income ranges, needed for population growth targets for individual jurisdictions, if available.

3. The Scoping Notice asks three specific questions:

- a. What important regional issues should we focus on during the update?

Response: The updated RGS should focus on increasing development densities in existing urban growth areas where the region invests in efficient, high capacity transit, regardless of the current "regional geography" classification of the area. The SCT letter suggests a few other ways to prioritize where future growth should occur, and the current system of regional geographies does not effectively work as a system for prioritizing where growth and infrastructure investment should occur.

- b. How should the region's growth strategy be updated to plan for 2050?

Response: The current system of regional geographies is a flawed and artificial construct as a means of prioritizing where the region should focus growth. Growth occurs as much where the market drives it as it does through planning policy, growth targets, or zoning designations. The current RGS focuses on static city boundaries that will change over time through annexation. The RGS should include the unincorporated areas associated with cities. Growth in an unincorporated area that is associated with a city should be planned for eventual annexation by the city. The current system of regional geographies

allocates growth based on current city boundaries, and appears to assume that there will be little annexation activity.

c. What impacts and actions should be evaluated through environmental review?

Response: Vehicle miles traveled (VMT) should be compared for each alternative. VMT can serve as a proxy for a number of environmental indicators, including congestion, air and water quality impacts, carbon emissions, as well as economic indicators such as lost productivity, and quality of life impacts, such as time spent commuting.

4. Other recommendations include the following:

- a. Identify how the RGS will assist local jurisdictions in creating a more favorable environment for the economic investment needed to become successful in attracting the desired shares of population, housing and job growth.
- b. Recognize the geographic and economic differences throughout the region and do not assume that the other three counties will or should develop in the same manner as King County.
- c. During the process of updating Vision 2050, please pay attention to comments from local jurisdictions responsible for implementing the regional vision through local land use regulations and infrastructure investments.
- d. Identify what is not working in the existing Vision 2040, and provide an explanation of the reasons where growth has not occurred at the rate, or in the manner anticipated by the RGS. Identify changes in policies or actions needed to address these deficiencies.
- e. Prioritize additional growth around the regional transportation infrastructure that will be completed by 2050 (e.g., light rail, bus rapid transit, increased local transit), and in the areas identified in local comprehensive plans as priorities for redevelopment.

We appreciate your consideration of these comments. If you have any questions, please contact Allan Giffen, Everett Planning Director.

Sincerely,

A handwritten signature in black ink, appearing to be 'Cassie Franklin', written over a horizontal line.

Cassie Franklin, Mayor

Cc: Everett City Council
Nick Harper, Deputy Mayor



CITY HALL
33325 8th Avenue South
Federal Way, WA 98003-6325
(253) 835-7000
www.cityoffederalway.com
Jim Ferrell, Mayor

ATTN: Vision 2050 Comment
Ryan Mello, Chair
Growth Management Policy Board
1011 Western Avenue, Suite 500
Seattle, WA 98104
Vision2050@psrc.org

March 19, 2018

RE: VISION 2050 Scoping – Emerging and important issues

Dear Mr. Mello;

As you consider regionally significant issues to include in the update to Vision 2040, the City of Federal Way proposes that the following topics be addressed:

Connectivity of Greenways and Paved Trails across Jurisdictions and Counties

One of the biggest assets the Puget Sound region has is its natural environment. Having green spaces like paved trails in our region can provide a great way to get exposure to the outdoors without having to stray far from home. As the region expands and density increases, prioritizing green space is a good way to not only maintain natural land but combat built development while benefitting the growing population. With PSRC's goal of providing alternative "transportation options" and emphasis to "keep the central Puget Sound region healthy and vibrant as it grows", connecting paved trails promotes bike transportation, one of the most environmentally friendly and healthy ways to commute.

Federal Way's BPA Trail looks to expand past the City of Federal Way's city boundary to the southern end, which would be the Fife Heights CDP, and to the northeastern end, which would be the Federal Way/Kent Urban Growth Area. However, if the trail were to extend out according to the City's Master Bicycle and Pedestrian Plan, there would be no connectivity at either extreme to any other trail, despite the BPA trail's proximity to the interurban trail at both ends (the Fife-Milton leg of the trail at the southern end and the Kent-Auburn portion of the main trail at the northeastern end). It shows, through our analysis of the region that Federal Way is not alone in developing trails that span an entire city, only for said trails to stop dead at city boundaries even when close to another trail.

Federal Way would like the Puget Sound Regional Council to consider focusing efforts on linking trails not only in South King and Pierce County but region-wide in their VISION 2050 update. Since many of the paved trails end at the boundary of jurisdictions, connecting them to another paved trail can positively impact multiple counties or cities. Thus, their interconnectivity should be a regional issue, not just an issue that's city-wide or county-wide.

The City recommends that a policy similar to the following be crafted for inclusion in VISION 2050:

Develop region-wide trail connections, coordinating among local jurisdictions and countywide planning groups, with an emphasis of connecting existing trails in different jurisdictions.

Housing Policies

Across the region, it can be seen that providing for the lowest 30 percent of Adjusted Median Income (AMI) has been lacking, contributing in part to the increasing homeless population. Federal Way believes, however, that opportunity is there to grow, as supply for lower income housing is always in high demand. Federal Way would like the Puget Sound Regional Council to work with cities and counties to prioritize developments serving those in the lowest 30 percent of AMI. VISION 2040 has many policies addressing the need for housing affordable to the low and moderate income, however, goals and policies related to the availability of housing for the very low income are missing.

The City recommends that a policy similar to the following be crafted for inclusion in VISION 2050:

Encourage a region-wide supply of housing affordable to the very low-income, those making less than 30 percent of area median income.

Federal Way recognizes the difference in incomes and property values between South King County and the Seattle area, which encourages those working in the Seattle area to move southwards or to other regional areas with less housing costs. Therefore, Federal Way is also interested in multi-family development that serves a variety of income levels, not just those at 60 percent of AMI or below. We would like to see legislative changes that would facilitate the development of a mix of market rate and affordable housing based on a policy similar to the following:

Require affordable housing development throughout the region to have a percentage of market rate housing.

Annexation

The City's Potential Annexation Area (PAA) is part of unincorporated King County and the City receives no taxes from residents of that area. However, the city's streets and other services are impacted by the residents of the PAA and due to the annexation laws; the City of Federal Way has been unable to annex land within its PAA. The City would like to see VISION 2050 incorporate a goal and/or policy to make it easier for cities to annex land that it serves.

Thank you for the opportunity to provide input in this very important update.



Brian Davis
Community Development Director
City of Federal way



Planning Department

March 19, 2018

Erika Harris, AICP
Senior Planner and SEPA Responsible Official
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104

RE: City of Gig Harbor Comments on Vision 2050 Scoping

Dear Ms. Harris,

Please consider this letter and the attached email as the City of Gig Harbor's written comments on the Vision 2050 Plan and SEPA Scoping Notice issued by PSRC in February 2018.

I participated in the listening session at the Fife Community Center on February 20th and was part of the discussion at the Pierce County GMCC on February 21st where Michael Hubner presented the Vision 2050 Scoping Plan. I found the verbal comments provided at those meetings to be appropriate and thoughtful and hope that those comments are compiled and provided the weight they deserve.

I would also like to include in our comments the email provided to me on February 19th, 2018 from Gig Harbor City Councilmember Jeni Woock, enclosed.

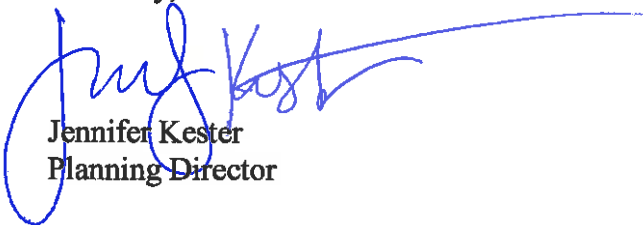
In addition to my verbal comments and the enclosed email, the City would like to provide comments on the specific request for "input on framework for considering modifications to growth strategy" (on pg. 10 of scoping document):

PSRC asks "How should the region's growth strategy be updated to plan for 2050?" The City of Gig Harbor recommends PSRC consider alternatives to the foundation of the Regional Growth Strategy (RGS) used for Vision 2040. PSRC should consider aligning the data for the updated growth strategy with the 2020 Census data, or at minimum PSRC should develop a detailed growth analysis based upon current market growth trends with consideration to still "bending the trend." Furthermore, it would be useful to make the growth data available for review and comment well in advance of preparing a recommendation for the Vision 2050 RGS.

Additionally, the demand for services due to geographic and economic constraints (water bodies and bridge tolls specifically for Gig Harbor) should be considered for small cities (or other jurisdictions completely surrounded by rural lands or water bodies) that are the services provider for the surrounding rural regions. Perhaps this includes a percentage increase for employment assumptions during the timeframe. This comment specifically stems from the issues raised in 2015 in regard to Gig Harbor's employment pipeline growth. These issues were detailed in a January 13, 2016 letter to Paul Inghram, and later recognized by PSRC through Full Certification of Gig Harbor's 2015 Comprehensive Plan Update.

Thank you for the opportunity to comment. If you have any questions please feel free to contact me at kesterj@cityofgigharbor.net or 253-853-7631

Sincerely,



Jennifer Kester
Planning Director

cc: File

From: [Jeni Woock](#)
To: [Jennifer Kester](#); [Bob Himes](#); [Jim Franich](#); [Ken Malich](#); [Kit Kuhn](#); [Michael Perrow](#); [Spencer Abersold](#); [Spencer Hutchins](#)
Cc: [Dave Rodenbach](#); [Shawna Wise](#); [Lindsey Sehmel](#)
Subject: Re: PSRC Vision 2050 Listening Session
Date: Monday, February 19, 2018 10:59:55 AM

Jennifer

Here are my comments and I would like to see all the comments before they are submitted to the PSRC.

Thank you

Jeni

These are my comments to the Puget Sound Regional Council as they prepare for 2050:

Cities shall provide information to the PSRC on how infrastructure plans including schools will be paid for before growth is allowed.

Small cities may be allowed to stay small.

Limit densities until appropriate timing when infrastructure is in place.

Cities need to have a full cost recovery of street, park, school and infrastructure improvements in place to support future growth.

Cities shall include development standards appropriate to retain small town character.

Cities shall remove proposals to expand the Urban Growth Area boundary that would increase capacity.

Down zoning can be used to slow growth.

Every city shall prepare for and encourage sustainability in their comprehensive plan.

Jeni Woock
Gig Harbor City Council, Pos. #1
3510 Grandview Street
Gig Harbor, WA 98335
253-851-8136
WoockJ@cityofgigharbor.net

On 2/16/2018 9:11:09 AM, Jennifer Kester <kesterj@cityofgigharbor.net> wrote:

Mayor and Council,

The Puget Sound Regional Council (PSRC) is embarking on the update to Vision 2040 called Vision 2050. Vision 2050 is expected to be adopted in early 2020. It will be the new multicounty planning policies that the City will need to meet for our 2023 Comp Plan update.

On Tuesday, February 20th, PSRC is holding a listening session in Fife to speak with Pierce County officials, planners, and residents about the update. I will be attending and I would



CITY OF
ISSAQUAH
WASHINGTON

**Economic Development
Development Services**
1775 – 12th Ave NW I PO Box 1307
Issaquah, WA 98027
PH: (425) 837-3450
issaquahwa.gov

19 March 2018

Paul Inghram, AICP
Senior Program Manager
PSRC
1011 Western Ave, Suite 500
Seattle, WA 98104

RE: Vision 2050

Dear Paul,

Thank you for providing the listening sessions regarding scoping for VISION 2050. I attended the Listening Session for Vision 2050 at Union Station and Paul Winterstein attended the Listening Session in Redmond. Issaquah comments were provided at those events; however, there are some additional comments Issaquah would like to provide as part of your request for initial comments.

Regional Transportation Improvements

The most prevalent issue facing the region is the influx of people and jobs; and, the pressures that sustained growth place on our transportation infrastructure. Although this will not be an isolated comment & concern, Issaquah believes this to be a 2-part problem. As 2050 seeks to provide good choices for transportation improvements to accommodate the expected growth, there are many existing regional transportation deficiencies that are adversely impacting our region. The strategy needs to be forward looking, but it must also look in the rearview mirror to provide a strategy to better connect our region as commuting times are becoming an increasing negative force to our continued prosperity. It is unlikely 2050 will show much improvement in housing and jobs balance on a city-by-city basis. Therefore, the transportation connections between our cities will remain the arteries that help this region stay healthy.

Workforce Development & Affordable Housing

The City has conducted an extensive outreach effort with our employers through our Business Retention Survey; and, with our residents through the development of our recently-adopted Housing Strategy Work Plan. What we found is that the two largest factors limiting growth for our employers is:

- 1) Access to a trained workforce; and,
- 2) The deficit of affordable, workforce housing.

Although these might be too specific to be directly addressed by 2050, these “outcomes” are directly related to your strategy of “find a balance in housing and jobs”. As PSRC looks at this housing-jobs strategy for the region, recognizing that Regional Growth Centers are spread throughout, there needs to

be sublayers to this strategy for applying new tools to better accomplish a balance at a local level. Only by so doing will the strain on the regional transportation system be lessened.

Access to Open Space

As we have been going through a year-long evolution of the vision for our Central Issaquah Plan, it has become clear through our public dialogues that we need to move past simply protection and restoration of open space areas. These continue to be a priority. However, as densities continue to increase within our urban areas, the need for people to interact with a trail, a creek, a forested hillside has become more apparent. Issaquah benefits from being at the edge of the UGA. For communities that are less fortunate to have abundant access to natural open space, providing convenient access to open space through trailhead development, more funding for preservation of sensitive lands, etc., should be part of our growth strategy.

Human Services

With increased densities comes more complex issues. Many suburban communities that, for the past 20 years, have been known as predominately white bedroom communities for our larger cities, have started to resemble their bigger neighbors. Racial diversity, homelessness, an aging population, safe injection sites, access to affordable health care, and other urban issues are becoming a broader component of our continued regional prosperity. We are very glad to see additional focus on social and cultural equity and the growing diversity of the region.

Thank you for consideration of our comments. Please do not hesitate to contact me if you would like to discuss any of these points further.

Sincerely,



Keith Niven, AICP, CEcD

Economic Development and Development Services Director

Cc.

Vision2050@psrc.org

Mary Lou Pauly

Paul Winterstein

Emily Moon

Trish Heinonen

Christen Leeson

**OFFICE OF THE MAYOR**

Dana Ralph, Mayor
220 4th Avenue South
Kent, WA 98032
Fax: 253-856-6725

PHONE: 253-856-5700

ATTN: Vision 2050 Comment
Ryan Mello, Chair
Growth Management Policy Board
1011 Western Ave., Suite 500
Seattle, WA 98104
vision2050@psrc.org

RE: Vision 2050 Scoping – Emerging and Important Issues

Dear Chair Mello:

As you consider regionally significant issues to include in the forthcoming update to Vision 2050, I propose the following topics be incorporated into your analysis. These comments reflect Kent's unique position as the third largest city in King County, with a rapidly growing population of more than 127,000. Our industrial area, of which our regionally-designated Manufacturing and Industrial Center (MIC) is a part, is the 4th largest in the nation. It is home to many high-tech manufacturing companies, but it also holds a significant portion of the region's warehousing and distribution facilities. With a large percentage of the city's land dedicated to these types of uses, the city is now challenged with the loss of \$13 million per year since the state's 2008 adoption of destination-based taxation through the Streamlined Sales Tax (SST) agreement.

Regional Support for Manufacturing and Industrial Centers (MICs)

The warehousing and distribution operations in Kent's industrial valley provide vital support to the region. This support comes at a high cost to the City due to destination-based taxation. Our City's demonstrated commitment to industrial land preservation supports the region's seaports and freight distribution operations, and makes possible many of the high-tech industries that call our region home. Meanwhile, the economic viability of land consumptive uses like warehousing and distribution is declining, and uses which could offer greater financial return to the City are precluded by regional policies to limit non-industrial uses in MICs. Among the prohibited uses are the amenities and services, including housing, that are attractive to modern industries and their employees.

As Kent weighs the opportunity costs from preserving large-block industrial lands in this post-SST environment, we are left to consider whether the MIC designation still makes sense for our City. For the City to sustain a model of industrial land preservation in the valley requires certainty that regional commitments to support MICs will be realized in tangible ways.

A project already identified in the Regional Centers Framework calls for staff to research economic impact metrics for MICs, to include revenue generation and export value. I encourage PSRC to specifically consider the economic contributions of warehousing and distribution centers, and to identify cost-sharing strategies to support areas that accommodate these uses, as the entire region benefits from their preservation. I also encourage PSRC to examine the opportunity costs of not having amenities and services proximate to the industries supported by MICs, i.e., examine motives for company

relocation and the corresponding opportunity costs for cities. My hope is that the 2018 SST replacement study authorized by SSB 5883 will recognize the regional contributions from the Kent Industrial Valley, as well as the economic costs of these contributions, and reveal some suitable solutions.

Designation Criteria for Regional Geographies

Growth targets and regional investments are allocated to Puget Sound cities based on the "regional geographies" assigned in the Regional Growth Strategy. It is unclear, however, how some of the regional geographies are assigned, and how a city would move to a higher tier. Kent is a Core City with two regionally-designated centers. With a population of 127,100, Kent has only slightly fewer residents than Bellevue (population 140,700), one of the five Metropolitan Cities. Although there is clearly some distinction between the two cities in terms of existing development character, Kent is aggressively zoned for growth and may achieve a similar population size in the near future. I propose that PSRC include in its scope of work for Vision 2050 clarification of policies on assigning regional geographies and reevaluating them over time.

Housing Policies

Much has been written and significant data analyzed regarding housing affordability, generally for categories 80% AMI or below. However, I suggest that PSRC gather data by city on housing availability at all levels of affordability to provide a more global context. This would mean depicting the percent of housing units at 30%, 50%, 80%, 100%, 120%, 150%+ AMI for each city. This context could inform strategies for considering regional equity in distribution of housing affordability. A recent analysis of Kent housing indicated a need for housing at 120%+ AMI and 30% or below AMI, with significant supply of housing in between. Oversupply or undersupply of appropriate housing types can skew housing affordability metrics when higher-income households occupy units that would otherwise be affordable to lower income households, or lower-income families are forced to cohabit high-end housing because very-low-income housing is unavailable. This supply/demand mismatch can also contribute to longer commutes and increased greenhouse gas emissions, when the local workforce has to look elsewhere for appropriate housing. Thus, having the right *type* of housing is a critical component of the jobs/housing balance articulated in the GMA, and one that is not given adequate consideration under existing policies.

Thank you for your consideration of these comments. The City of Kent looks forward to working with PSRC and our regional partners on Vision 2050.

Sincerely,



Dana Ralph, Mayor
City of Kent



KITSAP COUNTY BOARD OF COMMISSIONERS

Efficient, accessible and effective county services

March 19, 2018

Robert Gelder
DISTRICT 1

Charlotte Garrido
DISTRICT 2

Edward E. Wolfe
DISTRICT 3

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

RE: VISION 2040 Update – Kitsap County Board of Commissioners' Comments

Dear Executive Director Josh Brown,

Thank you for the opportunity to provide comment regarding the scoping on the VISION 2040 update. Kitsap County has reviewed the available documents including VISION 2040 and the Regional Growth Strategy. The following comments relate to scoping as well as future stages of the update.

The Puget Sound region has seen significant growth over the past ten years, so Kitsap County recommends that this update be comprehensive rather than simply a refresh of VISION 2040 and the Regional Growth Strategy. The SEIS is the environmental document that will support this update, and must provide a reasonable framework and multiple alternatives for future decision-making. If this framework is too narrow, it limits the flexibility of the update, and the ultimate applicability.

SCOPING

Does VISION just provide guidance or is it regulatory?

In 2008, VISION 2040 was a largely considered a guidance document, yet now seems more regulatory with subsequent PSRC certifications of local comprehensive plans. With this certification requirement, jurisdictions must view any changes or additions to VISION (e.g., growth targets, housing affordability, climate change, and public health) through that lens. Jurisdictions already face statutory obligations on these issues (through GMA, Departments of Ecology and Health, and FEMA, for example). The VISION update should not include additional regulatory hurdles that jurisdictions must address to receive PSRC certification.

How has PSRC reviewed the success of VISION 2040's existing goals and policies and Regional Growth Strategy?

It seems prudent to assess VISION implementation over time -- and impacts on the region -- before updating VISION. What has been its role in accommodating growth, reducing congestion and fostering urban development and housing affordability in the urban cores? What are the metrics and measurements we have used to assess successes or failures? Such an assessment sets a context for member jurisdictions and their constituents to effectively propose updates and amendments.

How are VISION 2040's goals and policies synchronized with the interlocal agreement signed by member jurisdictions?

PSRC is the region's metropolitan planning organization (MPO) to access federal transportation dollars. Thus, the interlocal agreement (ILA) with member jurisdictions provides PSRC the authority to act on our behalf. While transportation planning requires review of other planning issues, VISION 2040 expands beyond transportation and affects local planning decisions. The ILA stipulates specific areas of PSRC authority which includes "only regional issues including transportation, open space, air and water quality, economic development and regional facilities" Where is the nexus between the ILA tenets and many of VISION's goals and policies? New additions to VISION must also respect the integrity of this foundational agreement.

How will VISION acknowledge local planning as the basis of the Regional Growth Strategy?

Does VISION's Regional Growth Strategy direct local planning or is it developed from local plans? Again, the interlocal agreement establishes a framework for PSRC's authority as it applies to growth management and the Strategy. This agreement states "The regional growth management strategy shall be based on and developed from local comprehensive planning". Is this the planned practice in the VISION and Strategy updates? If not, are there plans to review the interlocal agreement in concert with the update?

GROWTH TARGETS

The Regional Growth Strategy update deserves as much attention as VISION's goals and policies.

While VISION's goals and policies are the framework for the region, the Regional Growth Strategy sets the targets that affect the types of data gathered and the local planning decisions aimed at PSRC certification. The current Strategy sets geographies (e.g. metro, core, large and small cities) based on specific criteria. Has the Strategy been evaluated, and are these still the appropriate planning constructs to allocate growth? The update should review other reasonable geographic classifications (such as those proposed by Snohomish County Tomorrow). The classifications and designation criteria must be fully reviewed *and alternatives considered* during the update.

Specifically, examining unincorporated urban areas as well as designated cities, rather than ranking them separately, is necessary. These areas should not be considered in isolation but as part of adjacent associated municipalities or based on their capacity for future growth and potential incorporation.

Allow local planning diversity within VISION and the Regional Growth Strategy.

While consistency is encouraged across member jurisdictions, a one-size-fits-all approach 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 I-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. Seattle is the core of the region, yet nearby satellite economies offer opportunities and diverse qualities that also must be encouraged and funded appropriately.

Military installations must be adequately considered in the VISION update.

Kitsap, Pierce and Snohomish Counties have sizable military installations that impact its 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 transportation funding discussions does a disservice to the counties in which they are located. These facilities must be considered commensurately to regional centers in VISION to address their similar impacts.

OUTREACH

How will the public and member jurisdictions' comments be used?

PSRC has developed a public outreach plan to generate comments on the VISION update, to be supported through public meetings and listening sessions. How are these comments documented, synthesized and presented back to jurisdictions throughout the process? How will minority opinions be distilled and provided to decision-makers? Reporting back is critical to the integrity and transparency of the process, ensuring continued participation in future stages. Throughout the process, the raw materials from public discussions (e.g. minutes, notes, videos) must be readily available as well as the meeting summaries.

FISCAL

How will revisions or new focus initiatives to VISION affect funding to jurisdictions?

The primary purpose of PSRC is distributing federal transportation funds to local jurisdictions. While many planning elements factor into transportation decisions, the fiscal implications are essential in reviewing any proposed amendments to VISION. While we understand the roles of the various PSRC Boards, each is focused on their specific responsibility often independent of each other, the VISION update cannot be siloed in that manner. Decisions on the update must assess the planning, operational *and* funding implications of changes to goals and policies to ensure a holistic view of any proposed amendments.

The Regional Centers process highlights key geographic differences between the member counties. The opportunities for access to transit and intensity of uses differ across the region and can affect regional classifications, growth targets and, ultimately, availability of transportation funding. Some of the new issues being asked to be addressed (e.g. housing affordability, homelessness, public health), are more acute for particular parts of the region. How will this factor into funding decisions? This must

be assessed and provided to the jurisdictions, public and Board members as early in the process as possible.

Thank you again for the opportunity to provide comment. If you have any questions or need additional information, please contact us at (360) 337-7080 or Eric Baker, Policy Manager, at (360) 337-4495 or ebaker@co.kitsap.wa.us.

Sincerely,



Robert Gelder, Chair

cc: Executive Board, Kitsap Regional Coordinating Council
 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



Planning & Community Development

1812 Main Street
P.O. Box 257
Lake Stevens, WA 98258

March 16, 2018

Erika Harris, AICP, Senior Planner
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104

RE: Vision 2050 Scoping

Dear Ms. Harris,

The city of Lake Stevens appreciates the opportunity to provide scoping comments for *Vision 2050*. The comments represent the position of Lake Stevens and reflect discussions held with member cities of the Snohomish County Tomorrow (SCT) Planning Advisory Committee related to PSRC scoping questions.

As part of its comments, the city would like to include by reference the SCT comment letter of December 7, 2017 to PSRC Executive Director, Josh Brown, that represent the collective concerns identified by SCT, for further evaluation. Specifically, the SCT letter:

1. Supports the current *Vision 2040* strategy of containing urban sprawl and directing future growth to existing urban growth boundaries;
2. Suggests the regional growth strategy should utilize all available lands within Urban Growth Areas to accommodate additional growth; and it
3. Recommends refined methods to distribute growth to areas with existing or planned infrastructure and investments, regardless of municipal category or size.

The city of Lake Stevens recommends the *Vision 2050* scoping document analyze the following issues.

Direct Growth to Appropriate Urban or Urbanized Areas

- Direct growth to cities and unincorporated urban areas best equipped to accommodate new growth.
- Direct growth to urbanized areas, regardless if they are incorporated, but where significant infrastructure planning and/or investments have been made, especially for regional transit, freight mobility and transportation systems.
- This strategy simply directs growth to appropriate urban areas, to better utilize the capacity of the entire UGA, without consideration of an assigned regional geography, to meet countywide needs.

- Organize urban growth areas into descriptive categories acknowledging the lack of homogeneity between the urban growth areas (incorporated and unincorporated) and unique situations within each of the four counties across the region, considering:
 - The presence of, or plan for, urban or local growth centers;
 - The presence of, or plan for, significant transit investments including but not limited to freight mobility, transit stations and rapid transit lines; and
 - The association to adjacent cities and the likelihood of annexation by 2050.

Growth Targets/Buildable Lands Analysis

- Over the years, the purpose of defining growth targets has evolved and changed. *Vision 2050* should clarify that growth targets, which are perceived as quotas, are aspirational goals for communities to organize their comprehensive plan's around. This distinction would help decision-makers address growth through meaningful code development that reflects actual market and historical trends.
- Recent legislation suggests the buildable lands reports (BLR) methodology will change and the scope of buildable lands analysis will increase. *Vision 2050* should clearly address how revised BLR methodology will affect each city's and county's capacity to accommodate growth under the regional growth strategy. Individual BLR capacities should be a determinative factor in establishing local growth goals within the regional 2050 strategy with consideration of a local municipality's ability to manage residential and job growth, provide urban services, encourage affordable housing, protect the environment and meet other goals of the Growth Management Act within defined planning timelines.
- The update should acknowledge the presence of a floodplains and other resources lands within urban growth areas and consider how this affect a jurisdictions' capacity to accommodate growth.

Conflicts and Coordination

- PSRC should recognize that overlapping goals or direct conflicts exist between various planning documents, state regulations and rules of individual state/federal agencies as it updates the regional growth strategy. The environmental review should analyze the impacts of these conflicts and provide guidance for resolution and mandatory coordination. Some prime examples are highlighted below:
 - A primary goal of the Growth Management Act is to focus population and job growth in urban areas; however, the continuing trend of agencies adopting ever increasing and more stringent environmental regulations significantly diminishes an urban area's ability to accommodate new growth. Surface water management and wetland regulations have the unintended result of decreasing available developable areas, as identified in applicable buildable lands reports. Consequently, this diminishes the ability of local jurisdictions to plan for new households and jobs without significantly intensifying density and scale of development, in a manner that may be contrary to the local culture or community desires.
 - A reduced land supply coupled with increased infrastructure and development costs decreases the affordability of housing units across the Puget Sound.
 - The scoping must consider increased and meaningful coordination between the Washington State Department of Commerce, Puget Sound Regional Council and the Department of Ecology to address conflicts created in implementing the Growth Management Act, regional growth strategy, environmental regulations and buildable lands reporting.
 - A secondary unintended issue related to increased density is the potential for the gentrification of existing neighborhoods. Gentrification almost always leads to increased housing costs in

conflict with affordable housing goals. *Vision 2050* will include goals of increasing density and of increasing the amount of affordable housing. This conflict should be thoroughly analyzed to determine ways to accommodate both goals.

- PSRC is developing a regional plan to accelerate the conservation of open space. The environmental review should analyze how plan goals and strategies will interact with *Vision 2050* and individual buildable lands reports.

Annexation

Annexations have become increasingly difficult to achieve, which can impact long-term planning efforts for both the affected city and county. If city and county comprehensive plans and zoning regulations are significantly different, it is hard to plan for growth at the UGA level, which may result in very different development patterns across the UGA. In turn, this unpredictability affects a jurisdiction's ability to produce adequate financial forecasts, plan for urban services, develop capital infrastructure improvement plans and identify appropriate staffing levels over the planning horizon. *Vision 2050* should recommend tools to make annexations streamlined and predictable and identify incentives to make annexations more attractive.

Technology

New technologies will alter traditional ways jurisdictions plan for growth, housing and transportation, both positively and negatively. The environmental review should consider the effects of new technologies on the regional growth strategy, including:

- The development and deployment of autonomous vehicles may increase the capacity of roadways without adding a lane, but create safety concerns;
- The increasing popularity of “telecommuting” will decrease the capacity on roadways, but may require unknown reinvestments in communications networks;
- Short-term lodging apps such as Airbnb, VRBO, Home to Go, and Home Away can decrease the availability of housing units for full-time residents and increase housing costs as demand increases.

Jobs-Housing Relationship

Examine why King County/Seattle/Bellevue receive noteworthy increases in employment. From this case study, PSRC can propose methodologies to distribute job growth evenly across the greater Puget Sound that will incentivize locating new businesses in the same city or county where employees live.

Please feel free to contact me at your convenience if you have any questions. Thank you again for the opportunity to comment on the environmental scoping review for *Vision 2050*.

Sincerely,

Russ Wright

Russ Wright, *Community Development Director*

Cc: Mayor John Spencer
Lake Stevens City Council
Lake Stevens Planning Commission

Liz Underwood-Bultmann

Subject: FW: Lakewood comment on VISION 2050

Liz Underwood-Bultmann, AICP | Senior Planner | Puget Sound Regional Council
1011 Western Ave Ste 500 | Seattle, WA 98104
206.464.6174 office | LUnderwood-Bultmann@psrc.org

From: Anne Avery
Sent: Thursday, February 22, 2018 12:58 PM
To: Paul Inghram <Pinghram@psrc.org>; Laura Benjamin <LBenjamin@psrc.org>
Cc: Michele Leslie <MLeslie@psrc.org>
Subject: Lakewood comment on VISION 2050

City of Lakewood: VISION 2050 Feedback

[Permalink](#) Submitted by John Caulfield on Thu, 2018-02-22 12:47

Thank you for the opportunity to provide feedback, comments and questions on the VISION 2050 scoping notice.

The scoping notice states that cities are thriving. This is not completely true. This notion is founded in cognitive biases based on the premise that “what you see is all there is.” The current conditions found within the “Seattle/King County purview” does not exist uniformly across the Puget Sound area. Rather, there is an immense deal of variability throughout PSRC member jurisdictions. This variability has historically not been well-incorporated into PSRC’s assessment and decision making structure. In past two decades, the greater Puget Sound area has witnessed increased polarization and socio-spatial inequity. This has, in turn, produced an unprecedented level of uneven development in our area. Simply, there are increasing pockets of “haves” and “have nots” throughout the Puget Sound. This uneven development, coupled with the continued retrenchment of centralized national and state programs, places cities in an extreme bind. Cities are increasingly faced with new fiscal constraints due to the downward re-scaling of social welfare programs by the federal and state government. As a result, most communities and cities as municipal organizations are struggling with a number of issues, including: negligible revenue growth; unfunded mandates from the state and federal government; and, increasing responsibility for what should be multiscalar responses to crises such as homelessness, mental health, and opioid addictions. From a regional standpoint, we are not doing a good job in protecting and preserving our environment, natural areas & open spaces, and farmlands. As part of the VISION 2050 process, will there be any outreach to learn of the current challenges and struggles facing in particular counties, cities and towns that are PSRC members?

As currently presented, VISION 2050 is intended to “build on the region’s existing plan,” and under the SEPA review process, VISION 2050 is technically an update to VISION 2040. However, there are problems in Puget Sound urban areas related to transportation, natural environment, economic geographic diversity and equity, housing affordability, and housing proximity to jobs that have been exacerbated by and even resulted from planning policies included within, and resulting funding decisions due to, VISION 2040. One of the alternatives to be reviewed under SEPA and as part of PSRC’s serious consideration must be a regional planning “reboot.” Instead of assuming the regional growth strategy is a success and should be simply extended another decade, current transportation, housing, and economic development conditions should be used as a new baseline for

planning into the future. Existing infrastructure and economic viability deficiencies across the region must be addressed before future capacity can be assumed and funded in specific “success areas.” The philosophy that economic growth and transportation funding should be concentrated into certain geographic areas (i.e., Regional or Metro Centers) needs to be questioned, and the opportunity to relieve transportation congestion and housing accessibility shortfalls by expanding investment in smaller jurisdictions and areas should be included in VISION 2050.

VISION 2050 should include policies focused on helping current residents and communities versus the projected 1.8 million yet to arrive. Likewise, VISION 2050 should include policies to govern, slow or stop growth until existing infrastructure deficits are eliminated. Other states do this, why not us? Why is this conversation not taking place?

A key principle of the Growth Management Act (GMA) is that growth is to be managed and infrastructure is to be developed that supports that growth. We are not keeping up with current growth in the Puget Sound. PSRC and the VISION 2050 project should first and foremost address existing infrastructure needs followed by current growth issues; only then should policies, strategies, and funding processes focus on accommodating another 1.8 million people.

As presented, VISION 2050’s scope does not address its members’ existing infrastructure capacity requirements. Vision 2050 must incorporate policies that address filling regional - and local - current infrastructure system gaps (i.e., water, sewer, storm water, roads, schools, public safety, public transit, etc.) while protecting and preserving our area’s natural resources. For instance, the City of Lakewood continues to deal with significant deferred capital infrastructure needs after incorporating just over 20 years ago, pursuant to GMA policies. Less than 20% of Lakewood’s roads have sidewalks, and even less than that have bike lanes. Regionally, there exists \$2 billion in storm water culvert replacement needs, the costs of the Puget Sound Initiative, and additional billions in road and transit capacity deficits.

The scoping notice states that between 2010 and 2017, 375,000 people have been added to the region, at a rate of roughly 53,600 annually. Yet, between 2020 and 2050, VISION 2050 estimates a population increase of 1.8 million, or 60,000 annually, a yearly increase of 12%. What are the underlying assumptions that substantiates this model in which the area is experiencing this level of growth. Given all the challenges we have today, where specifically by county, city, and neighborhood will they reside? What happens to the people living in this area currently? Where will this unsustainable growth go? For Lakewood, our adopted population estimate is 72,000 and could perhaps be lowered given that our community includes an air corridor zone vital to ensuring the national security of our nation coupled with humanitarian and disaster relief efforts nationally and internationally. Our analysis shows our population growing to perhaps no more than 66,000 to 68,000. How do conditions unique to cities and communities, like this, factor in with 1.8 million new people in our region?

The scoping notice states that between 2000 and 2017, 290,000 jobs have been added to our economy, or at an average of 17,000 per year, most along the I-5 corridor. VISION 2050 projects that 1.2 million jobs will be added between 2020 and 2050, or 40,000 per year, more than double the current annual rate. How is that possible; what are the underlying assumptions for this huge and sustained economic growth, and in what industries is the growth anticipated? Where specifically, by county, city and neighborhood will the jobs be located? How are the decisions PSRC is making today going to affect the distribution of jobs and what are the underlying implications for cities within the Puget Sound area? Do these decisions continue the on-going socio-spatial inequity and uneven development of the area?

Considering VISION 2050’s scoping population and job growth estimates together, how does a population increase of 60,000 annually translate into 40,000 new jobs annually between 2020 and 2050?

What policies are being contemplated to ensure adequate affordable & low income housing can be provided within all member agencies? For example, with the exception of the very wealthy, Seattle and many parts of King County are not affordable to the “middle class” and are inaccessible to low and lower income families almost completely. Yet, how do we ensure the protection and preservation of our single-family neighborhoods? What social justice policies are needed to ensure affordable housing is part of the equation in our major metro areas such as downtown Seattle and the eastside?

The reasons the region has a housing problem is because of: 1) escalating rents and home prices; 2) escalating construction costs; 3) existing regulatory barriers; 4) lack of available land, in part, as a result of this region’s geography; 5) the ‘not in my backyard’ mentality is alive and well in the Puget Sound; 6) limited public funding for affordable housing; and 7) development capacity because the basic infrastructure is inadequate or does not exist. The following is an example of a situation that happened in Berkeley, California, in which a mixed-use project was developed exemplifying many of these points. Trader Joe’s located in the downtown near the UC campus on a one-acre lot. The property was acquired in 2002 and was not ready for occupancy until June 2010; eight years later. Project was controversial from the very beginning. Issues were with traffic, lack of adequate parking, vehicle deliveries, and low-priced alcohol sales. The grocery part of the business is on the first floor with 4,000 square feet retail. No building setbacks of any kind. Above the grocery are four stories with 148 apartments. Twenty-two of the apartments (15%) have been set aside for lower-income persons. One-bedroom rent is \$2,800; two-bedroom rent is \$3,300. As of January 2018, one bedroom apartments in Seattle rent for \$1,964 a month on average, and two bedroom apartment rents average \$2,684. There are a total 116 underground parking spaces and that’s for the tenants and the grocery store. To this day, parking remains a controversial issue, and has been a regular topic of discussion; seven years after the project was completed. The point is, that it is easy to talk about mixed-use development and the promotion of higher densities. However, it is much more difficult at the local level, particularly in most areas of the Puget Sound to make it work so that it is successful. In the Berkeley case, they placed ‘too much stuff’ on a one-acre lot, and in the process, alienated the entire neighborhood. At the macro-level, with 1.8 million people proposed to reside in the Seattle-Tacoma Metro area, how is it possible that the quality of life will remain the same or improve? More likely, the quality of life will continue to deteriorate, and specifically, available housing will be limited and pricey.

What policies are needed to ensure there is a balance of housing and jobs across each county, city and neighborhood? Policies promulgated by PSRC over the past twenty years have not engendered equitable development across the board. Why is it that current policies have created the “haves” such as exists in Seattle and the “have-nots” such as exist in some of the poorest neighborhoods in Lakewood and other parts of Pierce County? What will be included within VISION 2050 to address this intensifying polarization of disparate economic conditions? Geographic equity in economic development is contemplated in the recently updated Regional Economic Strategy; this concept must be incorporated into VISION 2050 as well.

Our position on housing is that PSRC should not be involved; this is a local matter best handled at the neighborhood level. This allows PSRC membership to focus on allocating federal funding coupled with coordinating local land use policies.

Lakewood, along with the majority of other member cities, needs financial assistance to address current needs before we can even think about growing as assumed in PSRC’s Macroeconomic Forecast, Land Use Vision, VISION 2040 and VISION 2050’s preliminary scope. The state Office of Financial Management’s population allocations predict continued net migration and birthrates increasing Washington’s population. PSRC should be functioning as a regional body helping local governments meet baseline service levels for existing communities before these 1.8 million additional people arrive and put further strain on local governments and the natural and built environment.

Has PSRC asked its membership how much funding is needed to address current infrastructure needs just to address today's population and jobs? Has PSRC evaluated how federal transportation funds can be more effectively and equitably directed to communities to address the basics? How about allocating federal transportation funds (Transportation Equalization) to ensure all communities are on equal footing and that we all have an equal opportunity to make the needed improvements to our respective community?

GMA was adopted to ensure the quality of our life for our region. How does VISION 2050 assist local government in meeting this legal mandate and by doing so, ensure improved quality of life for our residents?

We appreciated the opportunity to attend a two hour listening session in Fife on Tuesday. There are almost 60,000 residents and over 4,300 businesses in Lakewood and almost 900,000 residents in Pierce County, what other types of community outreach will there be to allow the public to participate in providing the same feedback and input into VISION 2050's scope? Are listening sessions scheduled at member Planning Commission meetings, member City Council meetings, the myriad of service clubs that exist in our region, schools, business organizations, home owner associations, etc.? What role will social media play in obtaining feedback and comments? Will there be an online survey to obtain feedback and input? If so, how is that being rolled out? Has there been outreach and coordination with member communication teams? Are listening sessions scheduled in each community, or perhaps localized area meetings throughout PSRC's geographies, such as Lakewood, Steilacoom, DuPont and University Place? How about communities outside the main I-5 corridor, like Eatonville and Roy, what steps are being taken to obtain their feedback and input?



March 16, 2018

Erika Harris, AICP, Senior Planner
SEPA Responsible Official
Puget Sound Regional Council
1011 Western Avenue Suite 500
Seattle, WA 98104

RE: Vision 2050 Scoping

Dear Ms. Harris,

The City of Monroe appreciates the opportunity to comment on the scoping of the proposed environmental review for Vision 2050.

After reviewing the VISION 2050 SEPA Scoping Notice, the City of Monroe recommends that the scoping includes investigating the following issues:

1. Annexation: In recent years, annexations of established residential and commercial neighborhoods have become more difficult, and sometimes impossible, to achieve. The environmental review should consider the impact these unincorporated areas have on achieving the goals of the Growth Management Act (GMA) specifically: increasing the cost of infrastructure extensions to undeveloped land within the UGA; unincorporated residents accessing urban services without contributing to the cost; and the loss of one time development revenue to offset the impacts from growth. Vision 2050 should adopt policies to make annexations of developed property easier (or at least more likely to succeed) and what incentives could be provided to make annexation more attractive to those residents and businesses already located in the Urban Growth Area (UGA).
2. Urban Growth Areas/Directing Growth: Exacerbating the annexation issue previously discussed is the buildout of unincorporated UGAs prior to annexation. For example, Snohomish County allows the buildout of unincorporated UGAs to a density equal to or greater than the contiguous city. This leaves no incentive for those UGAs to annex into a city and results in an urban level density without providing urban levels of service (Goal 1 of the GMA) such as police and parks. This unorderly development of land impedes the densification of cities by offering developers green-fields (large undeveloped tracks of land) opposed to focusing on the re-development of land with existing infrastructure.

The scoping should evaluate the impacts on the environment, transportation and economy of allowing urban levels of development in the unincorporated UGAs prior to annexation. A potential solution may be a policy establishing a bright-line rule for unincorporated UGAs such as one unit

per five (5) acres prior to annexation or limiting the percentage of land, per parcel, that can be developed in an unincorporated UGA.

3. Future population/employment base: The scope should consider an allowance for greater densities in the Large Cities identified in the existing VISION 2040 Regional Growth Strategy and limit the amount of growth in the unincorporated areas/UGAs outside cities. Current trends show some counties exceeding growth expectations in the unincorporated areas/UGA's outside cities while cities outside the I-5 corridor are lagging behind. The current Vision 2040 policies allow green-field development on the fringes of incorporated areas. The resulting population growth occurs well outside Metropolitan Cities, Core Cities and Large Cities leading to sprawl, environmental degradation, expensive utility extensions and transportation bottlenecks on two-lane roads meant for rural levels of service.

VISION 2050 should also evaluate expanding the availability of commercial/industrial land in Large Cities. Increasing land values and development trends are pushing traditional blue-collar jobs out of the greater Seattle area. The scope should account for capturing these jobs in Large Cities to ensure they stay in the Puget Sound region.

4. Transportation: Regionally, providing transportation services for cities like Monroe outside the contiguous urban growth area is a constant challenge. It is understood that areas along the I-5 corridor contain greater density and results in greater public transportation ridership; however, there is still the need for an equitable transportation system throughout the four (4) county (King, Pierce, Snohomish, Kitsap) region.

In addition to Sound Transit, King County Transit and Community Transit, we recommend that the scoping reevaluate the 2013 *"Growing Transit Communities Strategy"* to include a review of smaller transportation systems like Snoqualmie Valley Transportation and Island County Transit (serving Stanwood in Snohomish County). Transportation systems like this provide the flexibility needed to serve these stand-alone cities and rural routes.

As the scope relates to transportation, we encourage PSRC (Puget Sound Regional Council) to review the need for upgrades and dedicate funding for US 2, SR 522 and State Route 9. As development continues east of the I-5 corridor in Monroe and surrounding jurisdictions, these highways are experiencing increased congestion. The completion of SR 522, Phase 1, constructed the additional two lanes needed to serve these communities but left an existing stretch with the original two lanes midway between Monroe and Woodinville. The current configuration of SR 522 creates a bottleneck of congestion and negates the work completed under Phase 1. This is a health and equity issue as identified in the draft Regional Transportation Plan.

5. Economic Prosperity and Sustainable funding for cities: With the limits of the 1-percent property tax initiated by I-747 and subsequently voted into law by the State Legislature, cities outside the I-5 corridor and counties continue to suffer the financial impacts created by this law. We request the scoping include reviewing the financial sustainability of local jurisdictions as it relates to implementing GMA and VISION 2050. Specifically the scoping document must evaluate investments in advancing economic development within rural communities as outlined in the 2017 Economic Development Strategy, *"Amazing Place; Growing Jobs and Opportunity in the Central Puget Sound Region"*. As housing prices continue to climb, rural areas continue to offer affordable housing especially for first time home buyers. However, investment in infrastructure including broadband and transportation cannot be supported without growth in retail, manufacturing, and jobs closer to these bedroom communities. Our economic prosperity is only as strong as our weakest link. Finding ways to sustain standalone cities and rural communities is vital in order to achieve equity for all residents throughout the region.

6. Growth Targets/Buildable Lands Analysis: Over the years the purpose of growth targets has evolved and changed. The recent legislation suggests the buildable lands analysis methodology will be changing.
 - a. The environmental review should consider how the impact of growth targets that act as precise growth assignments differ from the impacts if the targets are viewed as aspirational goals. Understanding the difference would help decision-making related to implementing the targets.
 - b. Recent legislation suggests the scope of the required buildable lands analysis will be increasing. The environmental review should address how this increased scope may affect the determination of an area's capacity to accommodate growth. The review should look at whether an increased buildable lands analysis scope will eventually have impacts of its own on permit processing timelines, the provision of affordable housing, and more. In addition, the recent legislation also suggests that more attention needs to be paid to the timing of anticipated growth when it occurs relative to market trends and key infrastructure investments. The review 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.
7. Critical Areas: PSRC should recognize that as it updates the regional growth strategy, the overlapping goals, or direct conflicts, exist between various planning documents, state regulations and rules of individual state/federal agencies. The environmental review should analyze the impacts of these conflicts and provide guidance for resolution and mandatory coordination.

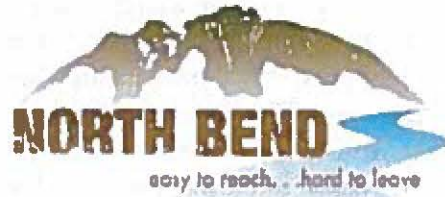
A primary goal of the Growth Management Act is to focus on population and job growth in urban areas; however, the continuing trend of agencies adopting ever increasing and more stringent environmental regulations significantly diminishes an urban area's capacity to accommodate new growth. Surface water management and wetland regulations have the unintended result of decreasing available developable areas, as identified in applicable buildable lands reports. Consequently, this diminishes the ability of the local jurisdictions to plan for new households and jobs without significantly intensifying density and scale of development, in a manner that may be contrary to the local culture or what the community desires.

The scoping must consider increased and meaningful coordination between the Washington State Department of Commerce, Puget Sound Regional Council and the Department of Ecology to address conflicts created in implementing the Growth Management Act, regional growth strategy and buildable lands reporting.

Sincerely,

A handwritten signature in black ink, appearing to read 'Geoffrey Thomas', with a stylized flourish at the end.

Geoffrey Thomas
Mayor



March 19, 2018

Erika Harris, AICP, Senior Planner
SEPA Responsible Official
Puget Sound Regional Council
1011 Western Avenue
Suite 500
Seattle, WA 98104

RE: Vision 2050 Scoping

Dear Ms. Harris,

The City of North Bend appreciates the opportunity to comment on the scoping of the proposed Vision 2050 update. The City of North Bend's goal is to focus on quality of life for our citizens and the region by retaining open spaces, trails and an urban designed core as we are the gateway town to the cascades. The City of North Bend and all the Snoqualmie Valley cities are asking for support for the Vision 2050 Plan to acknowledge our cities as urban entities with the same and maybe more severe growth impacts that all for the Puget Sound urban communities are experiencing. We need the Vision 2050 Plan to recognize the share of growth that the State mandates for North Bend. The City of North Bend recommends the scoping include the following considerations as detailed below.

Directing Growth: The City of North Bend would object to any classification of cities (eg small vs large) which is different than the Growth Management Act. North Bend is an "urban growth area" or UGA and as such needs to operate under the same rules as any other UGA City in the state. We are mandated by the GMA to deliver expensive urban services like sewer and thus we can't be restricted or treated differently than any other larger UGA City. Further we would oppose any language in the plan which interferes with the City Councils exclusive land use decision making process and much of 2040 attempted to do just that (eg limits on employment centers for small cities). The last round of Comprehensive Plan certifications caught small cities off guard. Previously allocated targets were explained by King County as neither a "floor or a ceiling". Many small cities planned for additional growth and completed infrastructure to accommodate that growth. North Bend desires to plan for future growth consistent with King County policies and the goals of the Growth Management Act but wants to be at the table during the process and respectfully requests being actively engaged in the process and discussions for future growth within our community and the region. 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. Understanding the difference would help decision-making related to implementing the targets. Recent legislation suggests the scope of the required buildable lands analysis will be increasing. The environmental review should address how this increased scope may affect the determination of an area's capacity to accommodate growth. The review should look at whether an increased buildable lands analysis scope will eventually have impacts of its own on permit processing timelines, the provision of affordable housing, and more. In addition, the recent legislation also suggests that more attention needs to be paid to the timing of when growth is anticipated to occur relative to market trends and key infrastructure investments. The review 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 better understood.

King County has consistently advocated that growth should not be directed or allowed in the "rural" cities of the Snoqualmie Valley, but rather should be directed to the urban core of Puget Sound. This is inconsistent with the Growth Management Act and has negative impacts to all of us in the Valley with respect to our comprehensive plans, compliance with the GMA, grants, and many other tools to cope with growth. The VISION 2050 Plan should recognize the City of North Bend and other Snoqualmie Valley Cities and like Cities in the region for their historic and projected growth rates that we have and will experience. Right now the City of North Bend is processing or have in the pipeline close to 1,000 housing units with 2.5 people per average unit we are increasing our population by over 35%. This amount of growth has tremendous impacts and implications.

Jobs, Housing and Transportation: The Vision Plan should endorse employment opportunities in our communities to create more job/housing balance and transportation opportunities and we should be included in planning for growth and the resources to serve our rapid development. The City aims to be a leader in transportation and has four roundabouts planned to become a non-signal City with an emphasis on biking and pedestrian mobility. VISION 2050 should also include allowance for a greater availability of commercial/industrial land in Large Cities. Increasing land values and development trends are pushing traditional blue-collar jobs out of the greater Seattle area. The scope should account for capturing these jobs in Large Cities to ensure they stay in the Puget Sound region. There is still the need for an equitable transportation system throughout the four-county region. In addition to King County Metro, we recommend the scope include review and inclusion of smaller transportation systems like Snoqualmie Valley Transportation. Transportation systems like this provide the flexibility needed to service these standalone cities and rural routes.

Water Resource Planning and Resiliency to Climate Change: PSRC should include in its scope water resource planning and resiliency to climate change analysis. Many of our communities are reliant on other water purveyors for drinking water. Western Washington has grown at an unprecedented pace. Our valley relies on water for fish, farms, and people. What is the long-term capacity of our existing regional water resources and will that change as the climate changes?

Critical Areas: PSRC should recognize that overlapping goals or direct conflicts exist between various planning documents, state regulations and rules of individual state/federal agencies as it updates the regional growth strategy. The environmental review should analyze the impacts of these conflicts and provide guidance for resolution and mandatory coordination.

A primary goal of the Growth Management Act is to focus population and job growth in urban areas; however, the continuing trend of agencies adopting ever increasing and more stringent environmental regulations significantly diminishes an urban area's capacity to accommodate new growth. Surface water management and wetland regulations have the unintended result of decreasing available developable areas, as identified in applicable buildable lands reports. Consequently, this diminishes the ability of local jurisdictions to plan for new households and jobs without significantly intensifying density and scale of development, in a manner that may be contrary to the local culture or community desires.

The scoping must consider increased and meaningful coordination between the Washington State Department of Commerce, Puget Sound Regional Council and the Department of Ecology to address conflicts created in implementing the Growth Management Act, regional growth strategy and buildable lands reporting.

The City of North Bend should receive the growth and resources to cope with growth that we are likely to experience as a part of the robust economy in the Puget Sound area. The City of North Bend needs infrastructure grants and ongoing reliable funding sources.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ken Hearing".

Ken Hearing- Mayor City of North Bend



March 7, 2018

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

Re: Scoping for Vision 2050

Dear Mr. Brown:

Thanks for the opportunity to comment on the Vision 2050 scoping process. Pierce County's responses below represent lessons learned from our experience with Vision 2040.

How should the region's growth strategy be updated to plan for 2050?

The regional growth strategy (RGS) needs more than an "update." It needs modifications to the geography structure and its approach to growth share distribution. More specifically,

1. Modify the "geography" structure of the RGS. Vision 2050 should:

- Incorporate major military installations.
- Re-examine how unincorporated urban areas are reflected in the RGS. It is unclear why unincorporated urban areas are separated into a distinct geography as they are obligated to accommodate urban level growth similar to cities and towns under the provisions of the Growth Management Act.
- Reconsider regional geography criteria. Currently, higher population cities are planned to experience a higher percentage of growth. This approach overlooks three important considerations: 1) These cities may not desire a higher level of growth; 2) Infrastructure challenges and proximity to other cities may not support the planned growth; and 3) Cities grow, which may change their classification (and growth expectations) based on an arbitrary threshold between plan updates.

2. Reexamine growth shares associated with RGS "geographies" to verify the targets are realistic. Vision 2050 should:

- Increase the growth share for unincorporated urban Pierce County. The current RGS does not reflect actual or vested development in unincorporated urban areas.
- Reflect economic realities in growth shares.
- Accommodate growth capabilities across geographies.
- Change the RGS base year to 2015 and only include growth shares. This will account for the actual distribution of growth between 2000 and 2015.

What regional issues should the plan address?

PSRC should clarify expectations for the “Small City” and “unincorporated urban” geographies, recognize infrastructure investments already made within these areas, promote economic development across the region, and address GMA. More specifically,

3. Establish a military “center” designation that augments the new military “geography.” Vision 2050 should:
 - Treat major military installations like other centers, which includes designating focused areas of activity as a “center” within the regional geography.
4. Clarify annexation and incorporation expectations. Vision 2050 should:
 - Recognize annexations (with limited exceptions) and incorporations require voter approval.
 - Clarify the role of cities and towns in facilitating annexation of unincorporated urban growth areas.
 - Acknowledge the fiscal challenges associated with annexation and incorporation and promote measures which address these challenges.
5. Clarify the role of unincorporated urban areas. Vision 2050 should:
 - Treat urban areas the same, regardless of its governance. GMA requires all urban areas to accommodate urban development and densities, so it is unclear why regional policy differentiates between unincorporated and incorporated urban areas.
 - Promote investment in unincorporated urban areas to facilitate annexation and incorporation.
6. Recognize existing populations and investment within unincorporated urban areas. Vision 2050 should:
 - Address where people live and work today *and* in the future.
 - Take into consideration the quality of life for residents across the region.
 - Recognize infrastructure planning and investments in unincorporated urban areas.
 - Support growth where infrastructure planning and investments have already occurred.
 - Recognize utilities have invested in infrastructure projects that would be repaid through previously anticipated growth and development.
7. Refine policies to address the inequity of the Regional Growth Strategy. Vision 2050 should:
 - Recognize the potential financial impact of limiting smaller jurisdictions’ growth.
 - Provide additional guidance related to the economic well-being and sustainability of small cities/towns.
8. Encourage economic development across the Puget Sound region. Vision 2050 should:
 - Promote jobs where the affordable housing is, rather than promoting jobs in locations where employees would need to commute to.
9. Update policies addressing schools in the rural area. Vision 2050 should:
 - Modify Vision 2040 multi-county planning policy MPP-PS-22 to be consistent with state law.

What information should guide the update?

Regional Growth Strategy restructuring requires information that illustrates how the adoption of Vision 2040 has directed growth and the extent of change needed to achieve planned targets. This information includes:

10. Growth and development trend data for each individual RGS geography.
11. Information related to vested development that hasn't yet been built.
12. Estimated housing and employment capacity for each RGS geography and a comparison with the current growth target for each RGS geography.
13. A gap analysis between a new RGS growth forecast and planned growth targets/growth shares per RGS geography.
14. Travel time, congestion levels (both current and forecasted) of major corridors, and current and future carrying capacity of travel modes.

What issues should be considered for environmental review?

The environmental review should include:

15. A discussion related to RGS growth restrictions within urban growth areas.
16. A new alternative representing observed growth trends within different regional geographies.
 - The current RGS is a goal that has not yet been reached and requires significant on-going action by jurisdiction(s).
 - It is a stretch to reach the current goal, and even more substantial action would need to occur if the RGS is just simply extended another 10 years.

Other Comments

Pierce County also offers comments on Vision 2040's use in comprehensive plan certification.

17. Consistent with its original intent, Vision should be utilized as a guidance document, not a regulatory one.
18. PSRC's certification process should only include the Transportation element of comprehensive plans.
19. The certification process makes it unclear where regional planning ends and local planning begins.
20. Vision 2040 conflicts with GMA regarding growth and development within designated urban growth areas because it implies some urban areas are to remain suburban or de-densify.

Again, thank you for the opportunity to comment on the Vision 2050 scoping process. We look forward to working with PSRC and other member jurisdictions to address the issues raised in this letter.

Sincerely,



Bruce F. Dammeier
Pierce County Executive



Douglas G. Richardson
Chair, Pierce County Council



CITY OF PORT ORCHARD

Office of the Mayor

City Hall • 216 Prospect Street • Port Orchard, WA 98366
Voice: (360) 876-4407 • Fax: (360) 895-9029
rputaansuu@cityofportorchard.us
www.cityofportorchard.us

March 14, 2018

Puget Sound Regional Council
1011 Western Avenue
Seattle, WA 98104-1035

Re: PSRC Vision 2050 Scoping Comments

The City of Port Orchard offers the following comments regarding the Vision 2050 scoping notice and comment period. The Port Orchard City Council has worked with the administration to review and consider the implications of Vision 2040 on the City's residents and on the region. We believe that there are certain portions of Vision 2040 that should be updated under all SEPA EIS alternatives that are considered. These relate to the overarching goals that the current growth strategy is designed to implement. We also have specific comments related to the development of alternative growth strategies. Our comments are organized based on the four parts of Vision 2040, as we understand that Vision 2050 will be an update to Vision 2040 rather than a new regional plan.

Vision 2040 Part One – Towards a Sustainable Environment

The City's review of Part One of Vision 2040 found an overwhelming focus on the natural environment. The City points out that the elements to be considered under SEPA include more than just the natural environment. Part One should be amended and expanded to a complete discussion of sustainability to include all components of the quadruple bottom line. Environmental sustainability, social equity, economic prosperity, and cultural vitality should be given equal weight in Part One of a new Vision 2050. The City performed a word count of the terms "enviro," "social," "econ," and "culture" and found that these terms occur 62, 2, 17, and 1 times respectively in Part One of Vision 2040. We believe that an emphasis on the natural environment in Part One is appropriate, but that the discussion of these other equally-important regional considerations, as generally categorized in WAC 197-11-444 (2) "Built Environment", should be expanded. The components of the quadruple bottom line as listed above should be balanced in Vision 2050. Specifically, the City requests to see greater discussion of the following in Part One:

- Housing affordability.
- The regional significance and presence of the military.
- Tribal considerations.
- Other cultural considerations including but not limited to diversity and art.

An additional consideration of sustainability that the City believes should be included in an update to Part One is that of the fiscal sustainability of government. This consideration also is not limited to any one alternative, but should be a component of Vision 2050 under all alternatives. As a region, our cities and counties should grow in a more fiscally sustainable manner. For instance, there are unincorporated urban areas across the region that are fiscally unsustainable in terms of the costs of providing services and replacing infrastructure, versus the revenue that is generated to county governments. Because of this lack of fiscal sustainability, these areas have not been annexed into existing cities. Through the transportation infrastructure investments made through PSRC, we should ensure that all areas are set to become more fiscally sustainable as a result of any investment.

Part Two – Regional Growth Strategy

Prior to defining regional growth strategy alternatives, PSRC needs to make a critical decision concerning the regional growth strategy. That decision is whether (1) the regional geographies under all alternatives are to grow with the region (i.e. whether the “small city” range increases from 22,500 to 30,000, as a population/employment threshold), or (2) whether cities are going to graduate from one geography to another as they grow. Deciding this is critical to evaluating a no action alternative and may be required for the evaluation of other alternatives. Port Orchard has a strong preference to remain as a small city geography. There are only two small cities and one large city in Kitsap County, and seeing Port Orchard transition from a small city to a large city under Vision 2050 would radically alter the regional growth strategy in Kitsap County. In addition, despite its growth, Port Orchard prefers to maintain its small town feel as it continues to grow. Finally, we believe that if the no action alternative is selected as a preferred alternative, progress in implementing the regional growth strategy would be more measurable if existing geographies are retained, as compared to a scenario where cities are being reclassified as they grow.

Concerning the development of alternative growth strategies, Port Orchard offers its support for evaluating the no action alternative, provided that cities are not reclassified (such as Port Orchard going from small city to large city). We will refer to this as proposed Alternative 1. We believe that Port Orchard could reasonably accommodate an additional 10 years’ worth of growth (from 2040-2050), according to the existing regional framework.

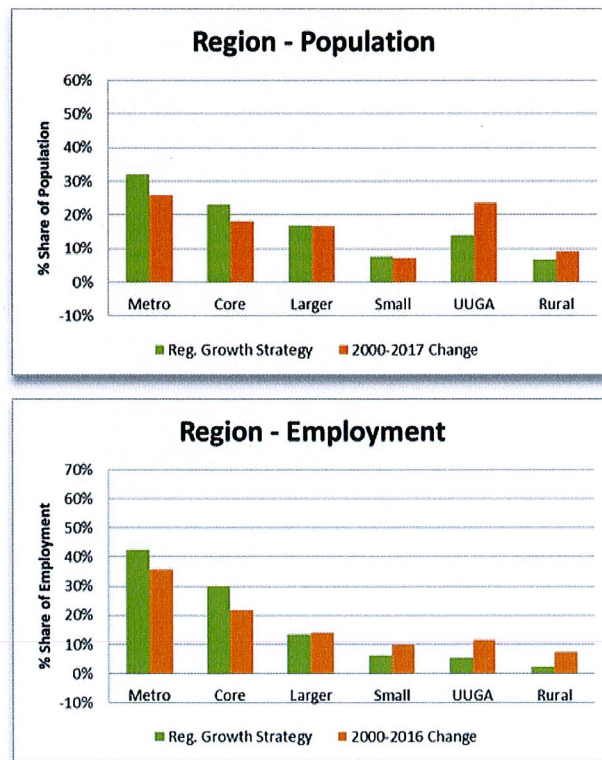
Port Orchard offers one other specific alternative to be considered as well as some other suggestions that could lead to the development of a third or fourth alternative for consideration:

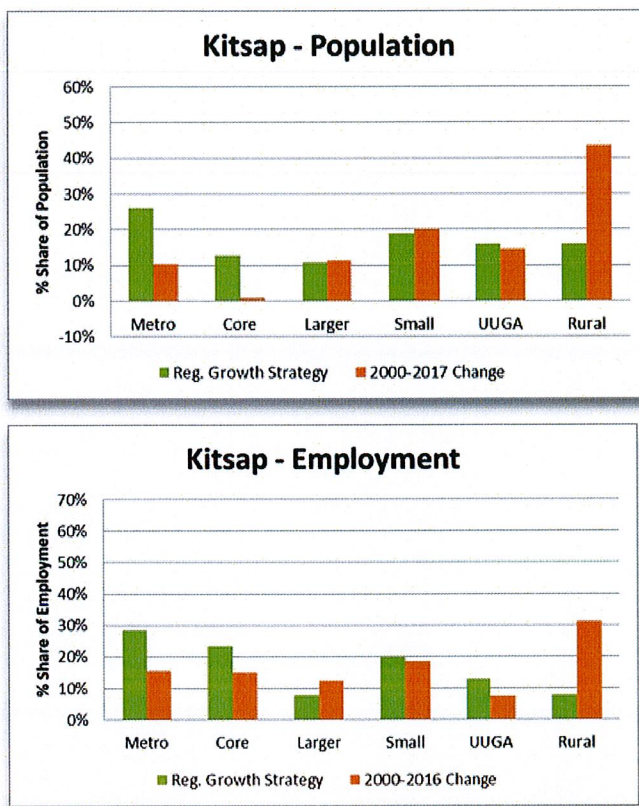
Proposed Alternative 2. Port Orchard believes that a more transit-oriented growth strategy should be considered as an alternative to the no action alternative. One of the most significant regional changes in conditions to occur since the adoption of Vision 2040 has been the passage of ST3 and, to a lesser extent, the passage of other transit measures such as a measure to fund fast ferries from Kitsap County to Seattle. Port Orchard supports evaluating an alternative growth strategy that seeks to allocate significant growth in the immediate proximity of new high-capacity transit facilities. Under this alternative, areas within walking distance of a high-capacity transit facility could be allocated a large portion of the region’s growth off the top of the 1.8 million in projected population growth, prior to allocating the remaining growth according to the existing regional framework.

If other alternative growth strategies are to be developed and evaluated, Port Orchard believes that PSRC may want to consider redefining regional geographies and/or creating sub-geographies. For instance, cities vary greatly in ways other than total population and employment numbers. There are cities that are geographically contiguous to the metropolitan areas, and there are satellite cities and towns surrounded by rural areas that may or may not be served by transit. There are islands and peninsulas that have unique water resource and infrastructure challenges, environmental considerations such as significant shoreline restrictions, and transportation constraints that may warrant exceptions to a rigid regional classification. There are also unincorporated areas that could reasonably be expected to incorporate in the future, which could be treated as cities for regional planning purposes. For instance, Silverdale could be treated as a large city for the purpose of the regional growth strategy.

Parts Three and Four – Planning Policies and Implementation

As we develop and refine the alternatives to be considered in the Vision 2050 EIS, we as a region need to recognize that we have not fully succeeded in growing in accordance with the strategy adopted in Vision 2040. Some cities and rural areas have already exceeded or are projected to exceed their growth allocations. Metro and core cities are underperforming. The alternatives that are developed should consider bringing Vision 2050 in line with the realities of the growth that has occurred, while considering how to encourage growth to occur in accordance with Vision 2050. The following graphs were provided by PSRC and show how the regional growth strategy is being implemented in Kitsap County and the region:





The alternatives evaluated in the EIS should consider alternatives for bending growth trends in areas that are over or under performing. A common theme under all alternatives should be to protect and preserve the rural areas in between UGAs, LAMIRDs (or functional equivalents) and cities from continued development beyond that which is envisioned in Vision 2040. One of the best tools available to PSRC and the cities and counties in the region for bending growth trends is the tool of concurrency (transportation, water, and/or sewer).

Throughout the region, cities and counties use different transportation concurrency methods and standards. It may be beneficial to standardize these systems in some way. Concurrency policies are required under the GMA, but inconsistent implementation can hugely interfere with achieving the regional growth strategy. If one jurisdiction has a lax concurrency standard, they could be encouraging more growth than has been allocated. Likewise, a city with too strict a standard could be preventing growth from occurring in accordance with the regional growth strategy. Especially in rural areas and unincorporated areas, we are exceeding our growth targets. Higher level of service standards in these areas could successfully slow growth and direct it into metro and core cities. As a region, we could allow transit-oriented development areas to have a lower concurrency LOS due to the presence of an alternative transportation strategy. Uniform standards would also simplify interjurisdictional mitigation of traffic impacts. The alternatives developed should consider the role of transportation concurrency (and possibly water and sewer concurrency) as a tool to implement the regional growth strategy.

Other Comments and Consideration:

Port Orchard suggests that consideration under Vision 2050 should be given to what happens after we as a region build out our existing cities and unincorporated UGAs. At some point it will be unreasonable to expect that reasonable measures to densify existing cities and UGAs will be sufficient for accommodating future growth. We need to evaluate how to grow once this occurs. Counties should begin evaluating long-term (beyond 20 year) alternatives for growth. The alternatives should include consideration of policies that require a long-term evaluation in advance of future updates to Vision 2050, to identify which lands are most suitable for future growth based on utility capacity, transportation capacity, and quadruple bottom line considerations. In this way, a predefined alternative will exist that can be evaluated in comparison to other alternative growth strategies.

There are several alternative (20+ year) growth strategies that could be evaluated:

- Keep generally-fixed urban growth boundaries. This may be the most environmentally sustainable alternative but may not maximize social and cultural considerations. In terms of economic sustainability, it is not clear whether this alternative is better or worse than expanding existing UGAs.
- Expansion of existing UGAs into rural areas. Cities (other than those that are landlocked) like Port Orchard could work with counties to expand their affiliated UGA boundaries outward. This may address social and cultural concerns, but at the expense of the environment. In terms of economic sustainability, it is not clear whether this alternative is better or worse than keeping fixed urban growth boundaries as described above.
- New compact high-density (+/-100 Activity Units Per Acre planning requirement 64,000-120,000 dwellings units/jobs that are no larger than 1-2 square miles) sustainable satellite communities supported by high capacity transit. Building new compact well-designed transit-oriented development communities supporting a large population of people and jobs could maximize the quadruple bottom line approach, in conjunction with preserving fixed urban growth boundaries. Counties could identify potential sites that are likely to be successful, such as sites in proximity of an amenity such as a tourism/recreational area or areas with access to existing rail corridors that are underutilized. Perhaps new technology or transportation solutions could play a role in the PSRC area becoming a global leader in that technology. Each county could be asked to identify 1-2 locations where a new sustainable city could be constructed.
- Convert rural LAMIRDS to UGAs/cities. Convert a place like Southworth or Manchester to become a UGA/city. It is not clear whether this is more or less sustainable under the quadruple bottom line considerations compared to a new city approach.

If we wait until the EIS scoping notice for the creation of Vision 2060 to develop a long-term growth strategy, there will be insufficient time to implement any of the above listed strategies. It is critical that we think long-term today, to avoid a situation where the only future alternatives that exist are to densify existing urban areas or to allow incremental expansion of existing urban areas. Planning sustainable new satellite cities served by

transit, or converting a LAMIRD to an urban area, will require years of study just to identify suitable locations before planning or design can begin. It is critical that Vision 2050 include steps to lay the groundwork for Vision 2060.

Please feel free to contact my office should you have any questions.

Sincerely,



Robert Putaansuu
Mayor





City of Seattle

Jenny A. Durkan
Mayor

Bruce A. Harrell
Council President

March 19, 2018

Josh Brown, Executive Director
Puget Sound Regional Council
Suite 500
1011 Western Avenue
Seattle, WA 98104

Dear Mr. Brown:

Thank you for this opportunity to provide comments on the scope of the Puget Sound Regional Council's review and update of Vision 2040. The collective efforts of jurisdictions around the region have contributed greatly to how we manage growth, and we believe that with some adjustments and refocusing, a revised regional growth plan can help us better address both the continuing and new challenges we all face.

Growth Strategy

We think it is time to revisit the "geographies" used in Vision 2040 for distributing growth. As information generated during the review of regional centers has shown, there are vast differences among the cities in the metropolitan and core cities categories – in their historic development patterns, as well as in their recent growth levels. Also, we have seen that distinguishing other cities based on their numbers of activity units at a point in time has proven problematic, as some small cities outgrew that definition partway through the planning period, graduating to larger city status, with confusing implications for expected growth levels.

Rather than rely on these somewhat artificial categories, we believe the regional strategy should be based on principles and criteria that define where growth can best be accommodated. We offer the following as basic principles for how to shape the growth strategy:

- Continue to reduce growth in rural and unincorporated areas
- Focus growth in designated centers
- Consider local conditions – encourage growth near frequent transit and discourage it where it would put pressure on the urban growth boundary

Seattle City Hall, 7th Floor
600 Fourth Avenue
Seattle, WA 98124

Tel (206) 684-4000
Fax (206) 684-5360
www.seattle.gov

Planning Themes

Vision's framework of "people, prosperity and planet" is still a very sound set of organizing themes in planning for growth. However, we strongly suggest that Vision 2050 needs to pursue each of these in more depth. For instance, with the suburbanization of poverty, governments throughout the region need to work together to address social equity issues related to the displacement of low-income households and people of color. The Vision update should promote access to opportunities and strategies that help all people in the region share in its prosperity.

Housing Affordability

Housing affordability is a related theme that should be represented in the update with suggestions for strategies that can help cities address the housing needs of their residents, with an eye toward more regional cooperation in these strategies. Vision should also encourage development of long-term systemic approaches that deal with not just the current crisis, but also provide resilience in the housing market to meet housing demand at affordable prices into the future. Additionally, Vision should acknowledge the combined costs of housing and transportation and identify strategies that address jobs and housing imbalances throughout the region as one way to help lower the cost burden on households.

Climate Change

Climate change is another theme related to the planet that should be emphasized. The update should address both the actions that local government can take to reduce greenhouse gas emissions and the planning they should be doing to adapt to the effects of global climate change. Vehicle trip reduction and the location of growth are key parts of Vision, and both can be used to help reduce emissions. The adoption of electric vehicles on a large scale within the planning horizon could also be a factor that helps decrease emissions, and ways to encourage or hasten that trend should be explored in Vision. Vision should also encourage better understanding of the expected impacts climate change will have on local resources and the actions governments need to take collectively and individually to manage those impacts.

Water Quality

Vision currently addresses the need to improve water quality in the region. However, the update could go further in identifying the need to address stormwater drainage and some of the best practices for managing drainage in order to best contribute to improving water quality.

Mobility

Mobility remains an important concern that should be more directly addressed as a theme in Vision. Residents tell us that regional and local investments in transportation, particularly transit, have not kept up with population and employment growth. During this next planning horizon, we are likely to see continued growth in shared mobility options (e.g., ride hailing, bike share, and others), the emergence of autonomous vehicles, and exponential increases in urban goods deliveries. Vision should continue to help the region prioritize space-efficient modes of travel and ensure that all members of our communities benefit from emerging travel options and the use of technology. Vision also should help

inform decisions that will be made in the next update of the regional transportation plan about the modes, technologies and locations of improvements that would be most effective to keep people and goods moving, with an increased focus on alternative travel modes to driving alone. The region would benefit from a more robust integration of Vision and the regional transportation plan.

Implementation

To ensure that we are following through with the commitments we all will be making with the update of Vision, it is important that the update include performance measures that jurisdictions and the region will move toward. These should at a minimum include measures of growth, displacement risk, access to opportunities, housing affordability, and mobility. The performance measures should focus on regional centers, where the growth strategy says we should be concentrating new development. The update should also describe a monitoring program that will report regularly on progress toward these goals, so that jurisdictions can fine-tune their practices in cases where sufficient progress is not being made.

Outreach

We are encouraged by the way PSRC staff has described its intended approach to engaging a variety of groups around the region - including historically under-represented communities - in the discussions about the Vision update and the plan to broaden the topics and values the update should express. The Growing Transit Communities planning effort made a good start to involving organizations that represent immigrants, refugees, and people of color. That is a worthy effort to build on, and there is more that can be done to reach those groups and others who have not typically participated in discussions of the topics addressed in long-range plans. There are lessons in the region and elsewhere about innovative engagement techniques that can broaden the conversation.

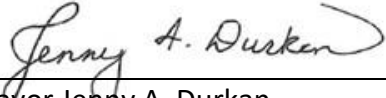
Timing

Updating the region's long-range growth plan is an ambitious project, and it is particularly ambitious to be doing it in a two-year timeframe. However, it is critical that the plan be completed in that time because of other projects that have mandated completion dates and that depend on Vision. Specifically, the Growth Management Act requires that three of the region's counties and their cities update their comprehensive plans by July 2023. Between the completion of Vision and that date, each county must reach agreement about the distribution of growth among its cities and complete a buildable lands report that will show how much and where development capacity remains. And then cities must conduct their own plan reviews and public engagement to identify and adopt changes to their comprehensive plans. Given that so much other work in all the region's jurisdictions is dependent on timely completion of the Vision update, it is essential that PSRC make all necessary resources available to this project.

We look forward to partnering with you on this important work and to participating in Growth Management Policy Board discussions and work sessions about this update. We also encourage you to take advantage of standing staff committees at PSRC that are

uniquely qualified to help advance topics and prepare them for more efficient discussions at the policy boards.

Sincerely,



Mayor Jenny A. Durkan



Councilmember Rob Johnson



Councilmember Mike O'Brien



**SHORELINE
CITY COUNCIL**

Will Hall
Mayor
Jesse Salomon
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Susan Chang
Doris McConnell
Keith A. McGlashan
Chris Roberts
Keith Scully

March 12, 2018

Erika Harris, AICP, Senior Planner
SEPA Responsible Official
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104

Ms. Harris,

The City of Shoreline appreciates the ability to comment on PSRC's Vision 2050 Plan. In general, the City supports the comments from the Growth Management Planning Council letter, which emphasize the following points:

- Maintain the Integrity of the Urban Growth Boundary;
- Emphasize Cities and Centers for Accommodating Growth;
- Build on Transit;
- Make Race and Social Equity a Cornerstone of the Plan;
- Use Land Use and Transportation to Address Housing Affordability;
- Reduce Climate Change Emissions and Address Resiliency; and
- Include Performance Measures.

In addition, the City would like to urge PSRC to consider how they can support cities that are actively engaged in implementing solutions to the region's most pressing issues, including the lack of affordable housing and increasing homelessness, and mitigating and adapting to climate change. In addition to being a clearinghouse for best management policies and other higher-level guidance, it would be helpful if PSRC would prioritize pass-through funding for cities that adopt regulations and propose projects that address these problems.

Given that Shoreline, along with King County and many of its municipalities, has adopted greenhouse gas emission reduction targets of 50% by 2030 and 80% by 2050 (80x50), it is fitting that the timeline for the vision coincides with this interim target date. Focusing on how cities, in partnership with regional entities, can most effectively leverage resources and the land use/transportation nexus to significantly reduce emissions, should be an outcome of this planning endeavor.

Lastly, in reviewing your February 2018 Regional Centers Framework Update, specifically the Regional Centers Designation Procedures, the City would like to see a stronger connection between growth centers and significant transit infrastructure, including light rail.

Thank you for undertaking this effort and for considering our comments. We look forward to working with you to develop and achieve this regional vision.

Sincerely,

Debbie Tarry
City Manager

March 19, 2018

Erika Harris, AICP, Senior Planner
SEPA Responsible Official
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, Washington 98104

RE: Comments on VISION 2050 SEPA Scoping Notice

Dear Ms. Harris:

Snohomish County appreciates the opportunity to provide feedback on the VISION update process and the SEPA Scoping Notice. We know that adding 1.8 million more people and 1.2 million more jobs to the region by 2050 is not an easy task. Snohomish County and its cities have been engaged in this discussion and we look forward to continuing to work with PSRC throughout the Plan's development to create vibrant, livable communities throughout the region that protect our natural resource and agricultural lands.

On behalf of the County, I would like to thank you for your willingness to receive early feedback, including the letter from Snohomish County Tomorrow (SCT) to PSRC Executive Director Josh Brown dated December 7, 2017. This letter includes the SCT letter by reference and reiterates Snohomish County's recommendation that VISION 2050 incorporate a regional growth strategy (RGS) and supporting policies that maintain a stable urban growth boundary by utilizing all available lands within the UGA.

Since the SCT letter was sent, Snohomish County has continued to engage in the VISION update process, including meeting with representatives from PSRC, hosting a VISION 2050 summit with participation by 83 elected representatives and staff from throughout Snohomish County, providing feedback at a PSRC Listening Session in the City of Lynnwood, and continuing work with Snohomish County Tomorrow to envision the future of Snohomish County. We appreciated meeting with PSRC staff and thank them for their efforts to better understand our concerns with concepts in the RGS under VISION 2040.

PSRC has requested feedback in three key areas: areas that need new or additional environmental review; identification of new or emerging issues; and updates to the region's RGS. The remainder of this letter addresses these topics.

Scoping Question: What issues should be considered for environmental review?

Climate change impacts, mitigation, and adaptation: Snohomish County affirms the scoping document's suggestion to build on the climate change analysis that is embedded in the air quality chapter of the VISION 2040 FEIS. We further recommend presenting this analysis in its own chapter, since there is now substantially more regionally-specific information regarding climate change impacts, mitigation measures, and infrastructure resiliency and adaptation options since the VISION 2040 DEIS was released in 2006. Additionally, the analysis should assess how each alternative impacts the region's ability to adapt to climate change.

Impacts on the conservation of open space: Snohomish County shares in the PSRC's commitment to preservation and restoration of Puget Sound, including responsible stewardship of rural and resource lands and

open space. Throughout Snohomish County, these areas serve as important agricultural production, flood storage, and habitat. They also provide invaluable recreational opportunities, aesthetic value, and ecological importance. The VISION 2050 analysis should assess each of the alternative's impacts on the ability to preserve and restore open space within urban growth areas as well as in rural areas.

Infrastructure: We affirm that the environmental analysis should include an assessment of infrastructure and funding needs in the environmental analysis. It will be particularly important to assess the more localized impacts that may occur due to increased population growth concentrated in specific locations (for example, impacts in terms of LOS, identification of infrastructure gaps, and additional costs to maintain existing infrastructure).

Housing and inequality: In order to accommodate increased population within the urban growth area, urban areas will typically need to increase allowed density. Although many factors can contribute to gentrification, in developed areas when increased density is allowed the result is often gentrification of a neighborhood. This frequently leads to increased housing costs. The impacts of the growth strategy on housing affordability should be analyzed.

Growth targets: Over the years the purpose of growth targets has evolved and changed into viewing them as precise targets. The environmental review should consider how the impacts of growth targets that act as precise growth assignments differ from the impacts if the targets are viewed as aspirational goals with a range of possibilities. Understanding the difference would help decision-making related to implementing the targets. The range of possibilities for growth targets should include an analysis of what may occur if funding for large infrastructure projects is delayed. Due to potential uncertainty of funding (at multiple levels), we recommend that VISION 2050 outlines how delays or shortfalls will affect the growth accommodations.

Demographic shifts: Snohomish County commends PSRC staff on technical work from previous VISION and related documents. To this end, we affirm the Scoping Notice's recommendation to include robust information about demographic shifts as the region prepares for an additional 1.8 million residents.

Scoping Questions: What regional issues should the plan address? What information should guide the update?

Annexations: In recent years, annexations have become increasingly difficult to achieve. The VISION update should consider the impact these challenging political and fiscal environments are having on achieving the goals of the Growth Management Act and the preference for urban services to be provided by cities. Additional tools and strategies are needed to help incentivize annexations.

Infrastructure needs: The approval of Sound Transit 2 and Sound Transit 3 (ST 2 and ST 3) *Link* light rail is a significant change since VISION 2040 was adopted. The success of ST 2 and ST 3 relies on effective access to the network. Snohomish County is identifying and studying corridor improvements providing east/west mobility and access to the future light rail stations. We are also coordinating land use planning efforts with high-capacity transit infrastructure to leverage investments, increase access, and decrease congestion. Local government participation in infrastructure improvements is one of many necessary partnerships in order to effectively accommodate growth. For example, on State Route 524, the narrow right-of-way limits Community Transit's ability to provide bus routes to transport people from eastern parts of the County to future light rail stations. Additionally, increased densities around transit stations may necessitate substantial upgrades to water and sewer infrastructure and partnerships with special districts. We support VISION 2040's previous efforts to coordinate land use and transportation planning, and recommend studying and planning for the additional infrastructure and partnerships that will be needed to realize this vision, including increased coordination with WSDOT. The state transportation system is the backbone of the regional transportation system and completing and improving it is critical to support increased growth. In developing Vision 2050, PSRC needs to work closely

with WSDOT's Office of Urban Planning to clearly show how the state system works in a comprehensive way to support growth.

ESSSB 5254: There are concurrent conversations occurring related to ESSSB 5254, which will provide new state guidance for the buildable lands analysis review and evaluation reports. The state guidance is aimed at developing recommendations for reasonable measures that will reduce differences between growth and development assumptions and targets with actual development. While the outcome of the new state guidance is unknown, it is important for the VISION update process to closely track and participate in these conversations to identify potential impacts to VISION 2050 and the regional growth strategy. For example, conversations for ESSSB 5254 implementation are occurring related to market factors, infrastructure gaps, housing affordability, and greater tracking of the impact of environmental regulations on development.

Conservation of open space: PSRC is developing a regional plan to accelerate the conservation of open space. The SEPA document should include an alternative that incorporates a priority for a more regional focus on conservation of agricultural, forestry, parks/recreation/trails, and open space. Regional trails should also be reviewed as part of the transportation network to capture the growing demand for non-motorized commuting. The conservation of working resource lands and open space should also be reviewed in light of regional policies related to expanding food production and enhancing equal access to healthy food and outdoor opportunities.

Enhancing range of housing types: As the region prepares for 1.8 million more residents, it is critical that we plan for a variety of housing options. In Snohomish County, we have a "missing middle" of housing options (such as condos, townhomes, and multi-family). The VISION update should include strategies to facilitate market shifts, including incentives for this type of development, how to limit liability, and other creative solutions.

New Technology: New technologies will have an impact on the capacity for urban areas to accommodate new growth. Certain technologies, such as autonomous vehicles, the rise of telecommuting and the sharing economy, will affect the demand for housing and transportation in ways that will directly impact an urban area's ability to accommodate growth, both positively and negatively. The VISION update should consider the impacts these technologies will have on growth. Additionally, the VISION update should consider the growing necessity for broadband access, and equity considerations in rural areas.

Scoping Question: How should the region's growth strategy be updated to plan for 2050?

The PSRC staff have expressed that the VISION update will include a review of the Regional Growth Strategy (RGS). Snohomish County suggests that the following revisions to the RGS be considered during the update.

Revise the RGS to utilize all available land within the UGA: Snohomish County is committed to a stable urban growth boundary and believes this should continue to be a priority in VISION 2050. For this to occur, the RGS should better utilize all potentially available land within the UGA. Continuing to focus growth mainly in Metropolitan and Core cities may not include enough jurisdictions with growth capacity to get to the full timeline of 2050. Further, because of the growth assignments under VISION 2040, jurisdictions (such as Larger cities under the RGS, and unincorporated areas in Snohomish County's Southwest Urban Growth Area) have not needed to pursue land use/zoning changes to fully realize infill opportunities. We request that the VISION update revise the current strategy of guiding most employment and housing growth to the region's major cities while expecting other cities and unincorporated urban areas to play a more modest role as locations for new growth. Rather, growth should be directed to urban areas where significant infrastructure planning and/or investments have been made, especially high-capacity transit and other transportation facilities, regardless of city size or whether or not they are incorporated. This revised approach will provide more opportunities for urban population growth within a stable UGA boundary.

Further recognize differences between the four county unincorporated urban areas: Provide more flexibility in the unincorporated growth areas to account for unique situations within each of the four counties. This could be

done by creating subcategories of the “unincorporated urban growth areas” in a manner similar to what was done with “small cities” in VISION 2040, in order to acknowledge the differences between the unincorporated urban growth areas across the region. The subcategories could be based on the following factors:

- a. The presence of, or plan for, an urban center within the unincorporated area, which might be candidates for Regional Center status under the proposed new Regional Centers Framework criteria
- b. The presence of, or plan for, significant high-capacity transit investments
- c. The presence of, or plan for, light rail transit facilities and stations
- d. The association to a specific adjacent city and the likelihood of the area being annexed by 2050.

In addition to recognizing differences between unincorporated urban areas, we request that VISION 2050 accounts for the uniqueness of Snohomish County’s unincorporated Southwest Urban Growth Area (SWUGA), which contains two planned ST 3 light rail stations (and one provisional station) and, if incorporated, would be the third largest city in the state by population. The unincorporated SWUGA is already urbanized and specific cities are planning on annexing and serving nearly all of it. Snohomish County is already preparing for the arrival of light rail to the unincorporated SWUGA through the “Planning for Light Rail” project. The project is coordinating its timeline with the GMA plan update. The VISION update should recognize the uniqueness of this area, and permit higher-density infill and redevelopment to assist with reducing the pressures of sprawl and growth in rural and resource lands.

Jobs-Housing Relationship: Examine why King County, especially Seattle and Bellevue, are receiving the bulk of the increase in both population and employment. Develop methods designed to distribute more of that growth to other counties in the region and study the impacts on the entire region if the methods are successful.

Provision of interim years in RGS: Recent legislation (ESSSB 5254, discussed earlier) suggests that more attention needs to be paid to the timing of when growth is anticipated to occur relative to market trends and key infrastructure investments. 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. The growth strategy and SEIS should consider the timing of infrastructure investments – not only where they will occur, but also when they will occur.

Thank you, again, for the opportunity to provide feedback for consideration by the Growth Management Policy Board. Snohomish County looks forward to continuing this collaborative process to create a regional VISION through the year 2050.

Sincerely,



Dave Somers
County Executive

Cc:

Snohomish County Council

Barb Mock, Director, Snohomish County Planning and Development Services

Steven Thomsen, Director, Snohomish County Public Works

Tom Teigen, Director, Snohomish County Parks



CITY OF SNOHOMISH

116 UNION AVENUE • SNOHOMISH, WASHINGTON 98290 • (360) 568-3115 • WWW.SNOHOMISHWA.GOV

March 21, 2018

Erika Harris, AICP, Senior Planner
SEPA Responsible Official
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104

RE: Vision 2050 Scoping

Dear Ms. Harris,

The City of Snohomish thanks you for the opportunity to comment on the scoping of the proposed environmental review for Vision 2050.

The comments below represent the position of the City of Snohomish. However, the City includes by reference the comments stated in the Snohomish County Tomorrow (SCT) Dec. 7, 2017 letter to PSRC Executive Director Josh Brown.

The City of Snohomish recommends the scoping investigate the following issues.

Directing Growth

Revisit the strategy of guiding most employment and housing growth to the region's largest cities while expecting other cities and unincorporated urban areas to play a more modest role in accommodating growth.

- Growth should be directed to the urban areas where significant infrastructure planning and/or investments have been made, especially to transit and transportation, regardless of whether or not they are incorporated.
- The strategy of directing proportions of expected growth to specific geographies should be modified so it is more generalized towards simply directing growth to urban areas without reference to specific geographies. The goal of fighting sprawl could still be achieved while reducing the stresses on the larger cities to try and accommodate the largest share of growth by allowing more growth to go to the smaller cities, if that is what the local decision-makers desire and the real estate market allows.

Unincorporated Urban Areas

Subdivide the "unincorporated urban growth areas" in a manner similar to what has been done with "small cities" in acknowledgement of the lack of homogeneity between the unincorporated urban growth areas across the region. The subdivisions could be based on the following factors:

- The presence of, or plan for, an urban center within the unincorporated area
- The presence of, or plan for, significant transit investments including but not limited to transit stations

- The strength of association to a specific adjacent city and the likelihood of the area being annexed by 2050.

Growth Targets/Buildable Lands Analysis

Over the years the purpose of growth targets have evolved and changed and recent legislation suggests the buildable lands analysis methodology will be changing.

- The environmental review should consider how the effectiveness and impacts of growth targets might vary if they act as quotas or are just inspirational. Understanding the difference would help decision-making related to implementing the targets.
- Consideration should be given to the impacts caused by adopting targets that reflect ideals rather than real world factors such as the real estate market and historical trends. In other words, is it better to have “truth in planning” or to aim high while discounting reality?
- Recent legislation suggests the scope of the required buildable lands analysis will be increasing. The environmental review should address how this increased scope may affect the determination of an area’s capacity to accommodate growth. The review could also look at whether the increased scope of buildable lands analysis might make the analysis better suited for establishing growth targets rather than being used to show whether an area has an appropriate level of capacity to meet the target.

Annexation

In recent years, annexations have become more difficult if not impossible to achieve. The environmental review should consider the impact this political environment is having on achieving the goals of the Growth Management Act. It should consider ways to make annexation easier (or at least more likely to succeed) and what incentives could be provided to make annexation more attractive not only to municipalities but to those with interests in the areas to be annexed.

Jobs-Housing Relationship

The impacts of a potential region-wide strategy that directs/incentivizes businesses to locate in the same county or area where their employees will live, with the goal of easing the burden on the region’s highways, should be analyzed.

Conflicts

Vision 2050 and the Regional Growth Strategy should identify instances where conflicting goals between and within various planning documents and regulations exist. The environmental review should analyze the impacts of these conflicts and help establish a prioritization of the goals. Examples of these types of conflict include, but are not limited to, the following:

- While a primary goal of the Growth Management Act is to drive population and job growth to urban areas, environmental regulations can significantly diminish an urban area’s capacity to accommodate new growth. Surface water management and wetland protection regulations frequently have the result of decreasing the amount of developable area of projects which in turn diminishes the capacity of those projects to provide for new households and jobs. The scoping should consider what impact the Washington State Department of Commerce could have if it embarked on a greater conversation with other departments, especially the Department of Ecology, to address these conflicts.

- A tool frequently used to accommodate increased population is to increase or eliminate density caps. In developed areas, increased density leads to redevelopment and the gentrification of a neighborhood which in turn leads to increased housing costs. The environmental analysis should investigate how increased density affects housing costs and the supply of affordable housing units, especially single-family dwelling units for families.

Technology

New technologies will have an impact on the capacity for urban areas to accommodate new growth. Certain technologies will affect the demand for housing and transportation in ways that will directly impact an urban area's ability to accommodate growth, both positively and negatively. The environmental review should consider the impacts these technologies will have on growth. Examples of such technologies include:

- The development and deployment of autonomous vehicles. Autonomous vehicles increase the capacity of roadways without adding a lane.
- The ever-increasing use of telecommuting to work. The more people telecommuting the less are commuting via motor vehicles which could help reduce congestion. The impacts of a growth strategy that facilitates and incentivizes telecommuting should be analyzed.
- Ride-sharing apps such as Uber and Lyft. Similar to telecommuting, these apps do not increase capacity but aide in reducing traffic congestion.
- Short-term lodging apps such as Airbnb, VRBO, Home to Go, and Home Away. These on-line services are already impacting the housing stock by decreasing the amount of housing units available for full-time residents. This in turn increases the cost of housing as supply goes down and demand increases.

Please feel free to contact us for clarification of any of the above comments. Thank you again for the opportunity to help guide the development of the scope of the environmental review for Vision 2050.

Sincerely,

John T. Kartak

John T. Kartak
Mayor

Cc: Snohomish City Council
Steve Schuller, City Administrator
Glen Pickus, Director of Planning & Development Services



COMMUNITY DEVELOPMENT DEPARTMENT

38624 SE River Street
PO Box 987
Snoqualmie, WA 98065

Office: 425-888-5337

www.ci.snoqualmie.wa.us

March 19, 2018

Erika Harris, AICP, Senior Planner
SEPA Responsible Official
Puget Sound Regional Council
1011 Western Avenue
Suite 500
Seattle, WA 98104

RE: Vision 2050 Scoping

Dear Ms. Harris,

The City of Snoqualmie appreciates the opportunity to comment on the scoping for the proposed PSRC Vision 2050 update. The City of Snoqualmie's goal is to focus on quality of life for our citizens and the region by retaining open spaces, trails and a vibrant, urban designed core as we are a gateway to the Cascades. The City of Snoqualmie and all the Snoqualmie Valley cities are asking for support for the Vision 2050 Plan to acknowledge our cities as urban entities with the same growth impacts that all the Puget Sound urban communities are experiencing. The Vision 2050 Plan should recognize the share of growth that the State mandates for Snoqualmie and I recommend the scoping include the following considerations as detailed below.

Directing Growth: Any classification of cities (e.g. small vs large) is objectionable which is different than the Growth Management Act. Snoqualmie is an "urban growth area" or UGA and as such needs to operate under the same rules as any other UGA city in the state. We are mandated by the GMA to deliver expensive urban services like sewer and water and thus can't be restricted or treated differently than any other larger UGA city. Further we oppose any language in the plan which interferes with the City Council's exclusive land use decision making process. Portions of Vision 2040 attempted to do just that (e.g. limits on employment centers for small cities). The last round of city comprehensive plan certifications by PSRC caught small cities off guard. Previously allocated targets were explained by King County as neither a "floor or a ceiling". Many small cities planned for additional growth and completed infrastructure to accommodate that growth. Snoqualmie desires to plan for future growth consistent with King County policies and the goals of the Growth Management Act but wants to be at the table and adequately informed throughout the process. We again respectfully request active engagement and inclusion in any discussion of future growth within our community and the region.

Page 1 of 3

Consideration should be given to how the impacts of growth targets, that may act as precise growth assignments, differ from the impacts if the targets are viewed as aspirational goals. Understanding the difference would help decision-making related to implementing the targets. Recent legislation suggests the scope of the required buildable lands analysis will be increasing. The Vision 2050 environmental review should address how this increased scope may affect the determination of an area's capacity to accommodate growth. The review should look at whether an increased buildable lands analysis scope will eventually have impacts of its own on permit processing timelines, the provision of affordable housing, and more. In addition, the recent legislation also suggests that more attention needs to be paid to the timing of when growth is anticipated to occur relative to market trends and key infrastructure investments. The review 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 better understood.

King County has on occasion advocated that growth should not be directed or allowed in the "rural" cities of the Snoqualmie Valley, but rather should be directed to the urban core of Puget Sound. This is inconsistent with the Growth Management Act and has negative impacts to all of us in the Valley with respect to our comprehensive plans, compliance with the GMA, grants, and many other tools to cope with growth. The VISION 2050 Plan should recognize the City of Snoqualmie and other Snoqualmie Valley Cities (and like Cities in the region) for their historic and projected growth rates that we have and will experience.

Jobs, Housing and Transportation: The Vision Plan should endorse employment opportunities in our UGA communities to create more favorable job/housing balances and vital transportation opportunities. We should be included in all planning efforts for growth and continue to be able to compete for resources to serve our anticipated development. In addition to King County Metro, we recommend the scope include review and inclusion of smaller transportation systems like Snoqualmie Valley Transportation. Transportation systems like this provide the additional flexibility needed to service stand-alone cities and rural routes.

Water Resource Planning and Resiliency to Climate Change: PSRC should include in its scope water resource planning and analysis for resiliency to climate change. Western Washington has grown at an unprecedented pace. Our Valley relies on water for fish, farms, and people. What is the long-term capacity of our existing regional water resources and will that change as the climate changes?

Critical Areas: PSRC should recognize that overlapping goals or direct conflicts exist between various planning documents, state regulations, and rules of individual state/federal agencies as it updates the regional growth strategy. The environmental review should analyze the impacts of these conflicts and provide guidance for resolution and mandatory coordination.

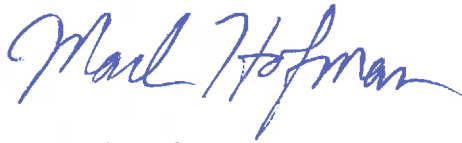
A primary goal of the Growth Management Act is to focus population and job growth in urban areas; however, the continuing trend of agencies adopting ever increasing and more stringent environmental regulations significantly diminishes an urban area's capacity to accommodate new growth. Surface water management and wetland regulations have the unintended result of decreasing available developable areas, as identified in applicable buildable lands reports.

Consequently, this diminishes the ability of local jurisdictions to plan for new households and jobs without significantly intensifying density and scale of development.

The scoping must consider increased and meaningful coordination between the Washington State Department of Commerce, Puget Sound Regional Council and the Department of Ecology to address conflicts created in implementing the Growth Management Act, regional growth strategy and buildable lands reporting.

The City of Snoqualmie and similar cities should receive the housing/jobs and resources needed to cope with growth that we are likely to experience as a vibrant part of the robust economy in the Puget Sound area. To do this, the City of Snoqualmie needs continued access to infrastructure grants and ongoing reliable funding sources. Thank you for the opportunity to comment and we look forward to participating in the update process.

Sincerely,



Mark Hofman
Community Development Director
City of Snoqualmie
P.O. Box 987
Snoqualmie, WA 98065



Office of Administration

Mayor Ron Lucas
March 14, 2018

Mr. Josh Brown
Executive Director
Puget Sound Regional Council
1011 Western Avenue, Suite 50
Seattle, WA 98104-1035

Re: Scoping for Vision 2050

Dear Mr. Brown:

Please consider the following comments from the Town of Steilacoom as you complete the scoping for Vision 2050.

How should the region's growth strategy be updated to plan for 2050?

A. More thought should be given to the Regional Growth Strategy geographies. Specifically:

1. Large military bases, such as Joint Base Lewis-McChord, should have their own geography that reflects their population, economic and traffic impacts on the region. Ignoring military bases because they are not subject to the Growth Management Act means the PSRC is not including major population, employment and traffic generating centers in its planning.
2. Provide a mechanism for movement between the geographies. Every city or town within the region will experience some degree of population growth, which will result in some jurisdictions moving from one classification to another.
3. Recognize growth that has occurred since the adoption of Vision 2040, whether or not that growth conforms to the Regional Growth Strategy.
4. Recognize existing and permitted infrastructure investments made, regardless of whether that investment was made in accordance with the Regional Growth Strategy.

B. Recognize that Vision 2040 is a plan, not an existing reality. Specifically:

1. Include a "no-action" alternative that follows the existing population and employment trends, not the Vision 2040 planned-for trends.

What regional issues should the plan address?

1. Create a Military Center designation for the region's major military bases.



2. Recognize the limitations small cities have to absorb the costs of annexation.
3. Promote economic development in areas with affordable housing, rather than just in employment centers. Concentrating jobs in a few areas increases traffic and transportation problems.
4. Promote economic development in small cities with existing infrastructure.

What information should guide the update?

The update should be based on up-to-date real-world data. Specifically,

1. Existing population and employment locations and trends.
2. Permitted infrastructure projects and planned-for development.
3. A review of the targets set for employment and population and the actual experienced employment and population growth by geography.
4. A forecast of the impacts continued growth will have on travel corridors, including whether increased traffic congestion will slow or discourage economic development within the region.
5. Reality versus hoped-for planning.

What impacts and actions should be evaluated through environmental review?

Environmental review should include:

1. Impacts of traffic congestion on continued economic growth.
2. Impacts of concentrating economic development in centers on housing affordability and traffic congestion.

Thank you for considering these comments.

Regards,



Ron Lucas
Mayor

Comment Letters on VISION 2050 Scoping

The Puget Sound Regional Council sought public input on scoping for the VISION 2050 plan and SEPA environmental review from February 2 through March 19, 2018. Background information on the project and public comment period is available on the [project webpage](#).

The comment letters are organized by commenter affiliation - [Jurisdictions](#), [Individuals](#), and [Listening Session Comments](#) are available in separate files.

Countywide Planning Organizations	Page
King County Growth Management Planning Council	2
Kitsap Regional Coordinating Council	5
Snohomish County Tomorrow	7

Agencies & Other Organizations	Page
350 Seattle	11
Bethel School District	15
Community Transit	16
Environmental Protection Agency Region 10	18
Greater Maple Valley Unincorporated Area Council	21
Master Builders Association of King and Snohomish Counties	28
Master Builders Association of Pierce County	38
Port of Bremerton	42
Port of Everett	
Port of Seattle	
Port of Tacoma	
Northwest Seaport Alliance	47
Puget Sound School Coalition (1)	
Puget Sound School Coalition (2)	
Seattle Freight Advisory Board	
Seattle King County REALTORS	56
Sierra Club	63
Snohomish Health District	73
Sound Transit	75
Cascade Bicycle Club	77
Forterra	
Futurewise	
OneAmerica	
Puget Sound Sage	84
Transportation Choices Coalition	
Sierra Club	90
Tacoma Pierce County Health Department	
Washington Environmental Council	95
Whale & Dolphin Conservation	97
Washington State Department of Transportation	

King County Growth Management Planning Council

March 19, 2018

Puget Sound Regional Council
ATTN: VISION 2050 Comments
1011 Western Avenue, Suite 500
Seattle, WA 98104

Dear Puget Sound Regional Council:

The King County Growth Management Planning Council (GMPC) submits the following comments on the VISION 2050 Plan and the SEPA Scoping Notice. The GMPC is chaired by the King County Executive and is a collaborative body with representatives from the four governance caucuses in King County: King County government, the City of Seattle, the City of Bellevue, and the Sound Cities Association representing the remaining cities in the County. Special purpose districts serving King County are also represented. The GMPC has been in existence since 1990 following the adoption of the State Growth Management Act to develop and then to oversee implementation of the King County Countywide Planning Policies.

King County has been successfully implementing VISION 2040 by focusing the majority of growth into the cities and the urban growth area, creating vibrant urban centers, protecting natural resource lands and rural areas, and focusing public investments to provide efficient facilities and services. King County intends to stay on this pathway of creating a sustainable future for our residents. VISION 2050 should not veer from this successful foundation but rather focus on those issues that were not fully addressed in VISION 2040 to carry the region into the future.

Maintain the Integrity of the Urban Growth Boundary

- Even with unprecedented levels of growth, King County has directed the vast majority of growth into the urban area by allowing more intense development inside cities and the Urban Growth Area.
- In 1990, before growth management plans were adopted, 85 percent of growth occurred in the Urban Growth Area in King County; in 2017, the share increased to 96 percent.
- It is critical for the protection of forests, farms and air and water quality that VISION 2050 and jurisdictions throughout the region continue to steer growth into the current Urban Growth Area.

Emphasize Cities and Centers for Accommodating Growth

- VISION 2050 should retain the structure of the Regional Growth Strategy, which directs 90 percent of employment and 75 percent of population growth to cities.

Among the cities, continue to direct the majority of growth into cities with regional centers. *(Note that these are region-wide numbers)*

- PSRC's recent analysis of regional growth centers and regional manufacturing/industrial centers shows that these places all have the potential to continue accommodating growth into the future.
- Cities and centers make it possible for more people to live near or more easily commute to their jobs, shopping and recreation and to reduce their need to drive to these destinations.
- Concentrating growth in centers also makes delivery of public services and infrastructure more efficient.

Build on Transit

- Since adoption of Vision 2040, light rail service has opened and expanded, and other transit service has also expanded, with more investments already planned.
- To take advantage of these investments, VISION 2050 should encourage more residential and commercial development near places that are well-served by transit and planned for additional high-capacity transit service.

Make Race and Social Equity a Cornerstone of the Plan

- The region should recognize that historic development patterns and policies have made it harder for low-income people and people of color to participate in the region's prosperity.
- VISION 2050 should promote policies that reduce the risk of housing displacement and encourage access to opportunities for all residents.

Use Land Use and Transportation to Address Housing Affordability

- The region is in the middle of a housing affordability crisis that is likely to continue, unless governments act in partnership with for-profit and not-for-profit housing developers and others.
- VISION 2050 should identify strategies that can be used at regional and local scales to make it possible for households at all income levels to afford living here.

Reduce Greenhouse Gas Emissions and Address Resiliency

- Concentrating growth into areas designated and planned for transit-oriented development and investing in multimodal infrastructure are examples of growth policies that can help reduce the amount of greenhouse gas emissions generated in the region.
- VISION 2050 should identify strategies local governments can adopt to mitigate the effects of climate change in the region.
- VISION 2050 should include policies that help the region be more resilient to climate change impacts.

Include Performance Measures

- Use the update process to develop and adopt measures and benchmarks for VISION 2040's goal statements.

- VISION 2050 should commit to reporting on performance measures on a schedule that supports local jurisdiction's planning activities, especially in advance of statutory plan update deadlines.

VISION 2050 is scheduled to be adopted at the PSRC's General Assembly in the spring of 2020. Meeting this deadline is critical because following adoption of VISION, local governments will have three years to complete their Buildable Lands Reports, update Countywide Planning Policies, extend growth targets to the year 2043, and then complete the state-mandated updates of their Comprehensive Plans by June 2023. This is a very aggressive timeframe for local governments making it essential that PSRC define a scope of work for the VISION update that can be completed and adopted in the spring of 2020. We look forward to engaging in additional conversations with PSRC's boards and leadership to secure agreement on a scope of work that is robust and achievable.

Thank you for your consideration.

Sincerely,

Dow Constantine
King County Executive
Chair, Growth Management Planning Council



Jeanne Kohl-Welles
King County Council, District Four
Member, Growth Management Planning Council



Jennifer S. Robertson
Bellevue City Councilmember
Member, Growth Management Planning Council

cc: Members, Growth Management Planning Council



Kitsap Regional Coordinating Council

Chair

Commissioner Charlotte Garrido ❖
Kitsap County

Vice-Chair

Mayor Becky Erickson ❖
City of Poulsbo

City of Bainbridge Island

Mayor Kol Medina ❖
Council Member Matthew Tirman

City of Port Orchard

Mayor Rob Putaansuu
Council Member Bek Ashby ❖
Council Member Jay Rosapepe*

City of Poulsbo

Council Member Ed Stern
Council Member Gary Nystul*

Kitsap County

Commissioner Rob Gelder
Commissioner Ed Wolfe

Kitsap Transit

Executive Director John Clauson

Naval Base Kitsap**

Captain Alan Schrader
Lynn Wall*

Port Gamble S'Klallam Tribe***

Council Chair Jeromy Sullivan
Noo-Kayet CEO Chris Placentia *

Port of Bremerton

Commissioner Axel Strakeljahn ❖
Commissioner Larry Stokes *

Suquamish Tribe***

Council Chair Leonard Forsman
Ambassador Luther "Jay" Mills*

* Alternate

** Ex Officio Member

*** Associate Member

❖ Executive Committee

Mailing Address:

614 Division Street - MS4
Port Orchard, WA 98366
360.337.4960

www.KitsapRegionalCouncil.org

Betsy Daniels, Program Director
Triangle Associates, Inc.

March 19, 2018

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

Re: Puget Sound Regional Council's (PSRC) VISION 2050 Plan and SEPA Scoping Notice – Kitsap Regional Coordinating Council Comments

Dear Executive Director Brown:

The Kitsap Regional Coordinating Council (KRCC) Board appreciates the opportunity to comment on PSRC's draft VISION 2050 Plan and SEPA Scoping Notice (dated February 2018). This strategy greatly impacts Kitsap communities. As a peninsula, Kitsap County is unique in size, location, topography, and relationship to Puget Sound compared to other counties in this region. The PSRC's Scoping must accommodate our local circumstances and geographic diversity.

Despite the progress made since VISION 2040, KRCC members are concerned with aspects of the VISION 2050 strategy and wish to see 1) evaluation of the document aligns with elements in VISION 2040, and 2) that VISION 2050 convey sustainability in terms of social equity, cultural vitality, environmental quality, and economic prosperity. VISION 2050's inclusion of this "quadruple bottom line" should include the following components:

- Social Equity: Place social equity and growing regional income disparity at the forefront of all discussions and decision-making. These factors will drive growth patterns as well as the need for innovative affordable housing strategies and financing over the next 30 years. We recognize that the land supply outcomes of VISION 2050 may impact housing affordability. In addition, an environmental justice analysis would provide a valuable metric.
- Cultural Vitality: Recognize the unique cultural attributes across different jurisdictions in the Puget Sound Region.
- Environmental Quality: To assure continued natural functions, we must attend to climate change mitigation and the protection of Puget Sound through energy and stormwater management. VISION 2050 should also address water quantity, which is a problem in some areas of Kitsap County due to reliance on well water systems.
- Economic Prosperity: Stimulate business opportunities and direct workforce development initiatives. The Plan must also support financing of infrastructure other than transportation.

We believe that each component of the quadruple bottom line should be given equal weight. Further, we expect that measures for these elements can help assess performance over time.

Some specific examples of Kitsap priorities to be included in VISION 2050 are:

- Acknowledge the importance and significance of all Native American tribes in the region. The tribes in the Puget Sound Region, as sovereign nations, have different governing structures and land configurations, and these unique factors must be recognized in VISION 2050. Consultation with tribes is necessary to obtain the latest relevant data for making land use and transportation planning policies.
- Acknowledge the value of military installations in the region. Include military installations' available land use and transportation data to better develop planning strategies. VISION 2050 must acknowledge the transportation, land-use, and housing demands created to support military installations and those retiring from military service.
- Indicate the importance and significance of designated freight corridors in the Puget Sound Region. Corridor continuity is essential and must be maintained and expanded to promote economic vitality and the military's mission.
- Develop a methodology for focusing growth along transit corridors. The Kitsap experience would have VISION 2050 include the role of ferries as a form of high capacity transit.
- Recognize the changing nature of our regional economy and shifts in our labor force. Identifying the impactful changes that automation and clean burning vehicles will have on how we work and travel play a critical role in our regional planning and funding models.
- Provide guidance and tools to implement the identified policies. KRCC views VISION 2050 as a guidance document, and its purpose is not to add additional regulatory requirements or policy.
- Evaluate and consider revising future employment and population growth allocations. Explore the current Regional Growth Strategy's (RGS) organization to determine whether to continue its use. The research could redefine regional geographies or create sub-geographies for growth allocation rather than specific categories of jurisdictions. If the current RGS survives, the jurisdictional classification criteria should be updated.
- Clarify the scope of PSRC. Provide an action plan to show transparency and predictability of future work planned by PSRC.

Thank you for taking into consideration KRCC's comments on this important effort. Please be in touch with KRCC Chair Charlotte Garrido with any questions or concerns (cgarrido@co.kitsap.wa.us).

Kitsap County

Commissioner Charlotte Garrido
(Chair)
Commissioner Rob Gelder
Commissioner Ed Wolfe

City of Poulsbo

Mayor Becky Erickson (Vice-Chair)
Council Member Ed Stern
Council Member Gary Nystul

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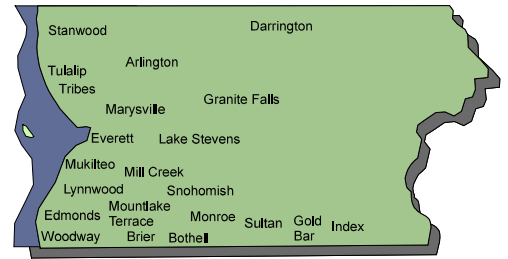
Commissioner Axel Strakeljahn
Commissioner Larry Stokes

Suquamish Tribe

Council Chair Leonard Forsman
Ambassador Luther "Jay" Mills

Snohomish County Tomorrow

A GROWTH MANAGEMENT ADVISORY COUNCIL



County Administration Building
3000 Rockefeller Avenue, M/S 604
Everett, WA 98201-4046

December 7, 2017

Josh Brown, Executive Director
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104

SUBJECT: Snohomish County Tomorrow – Recommendations for the Vision 2040 Update Process

Dear Mr. Brown,

Snohomish County Tomorrow (SCT), through its Planning Advisory Committee (PAC) and the Steering Committee, appreciates the opportunity to provide early input to the PSRC for consideration as it begins the process of determining the scope of the Vision 2040 update. We understand that the update will extend the planning horizon to 2050 and will include new regional growth distributions. The update process begins in January 2018, and is anticipated to be completed for action by the PSRC General Assembly in spring 2020. The following comments are for PSRC's consideration as they prepare for the upcoming scoping process.

General Approach for the Vision 2040 Update

1. We support the current strategy of containing urban sprawl and directing future growth to existing urban growth areas, supported by an efficient, multi-modal transportation system, with high capacity transit connecting regionally designated urban centers.
2. Vision 2040 reinforces the importance and predictability of a stable urban growth boundary in the region over time, and this concept should be retained. The ability to accommodate additional growth in already urbanized areas will reduce the pressure to expand UGAs. The regional growth strategy's growth distributions should better recognize all available lands within the UGA for accommodating urban growth, regardless of current municipal categorization.

3. The growth figures suggested by PSRC should recognize economic fundamentals and realistic timelines rather than being purely “aspirational,” a term that was originally used to describe the 2008 growth distributions.
4. SCT wants to discuss what “targets” will mean for the Vision 2040 update. In 2008, PSRC said the growth figures were provided as “guidance,” to be used as a starting point that would likely have to be adjusted over time. With time, however, they began to be interpreted as hard numbers. For the Vision 2040 update, SCT recommends returning to the original intent of using the growth allocations as guidance.

Revise the Principles for Growth Allocation

1. We request that PSRC evaluate and use revised principles for future growth allocation and distribution. The organization of the current RGS around the classifications of different cities can potentially result in various growth distributions that are all technically valid under the current RGS, but which could have unintended consequences that should be addressed by the RGS: for example, for the larger cities of Mountlake Terrace, Monroe, and Arlington, the RGS is silent on the city-specific growth allocations. However, the way the larger city growth is distributed to these cities can significantly impact the transportation system, exacerbate urban/rural-resource land interface conflicts, and be at odds with existing regionally funded and planned infrastructure investments.
2. SCT urges PSRC to explore new concepts for organizing regional geographies for distributing future growth at the regional level, such as urban core, urban ring, urban edge, and urban satellite (standalone) locations, which cut across municipal boundaries and are based on existing and planned urban land use and transportation characteristics. The regional growth allocation should focus growth around regional and local growth centers and major transportation / freight corridors, instead of prescribing growth distributions to specific categories of jurisdictions whose boundaries will change over time through annexation.
3. Sound Transit and Community Transit have made significant planning progress for the light rail and BRT systems for Snohomish County. The Vision 2040 update should recognize and support the integrated planning that is already occurring. These planned investments suggest 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 Metro and Core cities. The current regional policy that discourages growth in unincorporated UGAs should be reconsidered, as decades of planning and investment have anticipated some of these core unincorporated areas in the vicinity of the recent voter-approved Sound Transit 3 light rail stations between Lynnwood and Everett being highly urbanized since well before the adoption of Vision 2040.
4. The regional geographies that were originally developed and used for the Vision 2040 Regional Growth Strategy were based on current city boundaries at that time. As annexations occurred over time, however, the regional geographies diminished in value as a basis for understanding the location of growth assignments in the regional plan. Instead, PSRC should consider more static boundaries for growth allocation that are not affected by annexation, similar to the Forecast Analysis Zones (FAZs) or smaller scale Transportation Analysis Zones (TAZs). By using static boundaries with a smaller area, like TAZs, growth can be more precisely projected to areas with existing or planned infrastructure investments.

Recognize and Address Changes since Vision 2040 was Adopted

1. How have the patterns of job and housing growth occurring since 2008, and the vested development that has not yet been built but which will occur, deviated from the vision of where growth would occur? What changes in our future growth projections must be considered to account for these departures from the Vision 2040 RGS?
2. How well do the projected household incomes and housing needs align with the projected housing supply across the region? Can we better integrate the regional economic forecast with projected population growth to understand housing need? The Vision 2040 update needs to recognize housing affordability and equity goals. Can we do a better job of planning for housing types to be more responsive to the projected household incomes in the region and smaller subareas of the region? Additionally, growth allocations should consider the need for and barriers to medium-density, or “missing middle,” housing options.
3. It is important to recognize the significant differences in the regional real estate market and economic forces within each county, and how these forces affect the likelihood for job and population growth. For example, why have most of the new jobs in the region since 2010 located in King and Snohomish counties? Can we create more balance through regional growth policy changes? Or, will growth usually follow a major economic force, such as Amazon, Microsoft, or Boeing? (This comment refers back to the earlier comment about the need to build some flexibility into the growth distributions to account for unanticipated developments that affect the location and timing of job growth and housing development.)
4. We suggest that PSRC closely coordinate with all of the jurisdictions in the four counties to evaluate the growth capacity in existing plans, and to determine if the projected growth in each county between 2035 and 2050 results in the need for significant increases in land use capacity. How does the economic forecast align with the land supply under existing plans (in accordance with each county’s adopted Buildable Lands methodologies), and where does the forecast indicate the need for substantial increases in capacity?

Broader Policy Issues and Opportunities for PSRC Coordination and Support

1. Since the inception of GMA, local governments have suffered significant reductions in the ability to raise revenues for infrastructure and services. While we recognize that changes to State law are necessary to restore financial sustainability to local government, the Vision 2040 update should acknowledge that cities and counties have insufficient resources to address infrastructure and service needs adequately.
2. Our current comprehensive plans provide capacity to 2035. The Vision update will extend growth guidance to 2050 and will likely introduce amendments to the Multi-County Planning Policies (MPPs). Our next comprehensive plan update will occur in 2023, and extend our growth horizon to 2043. If the Vision update is adopted in 2020, there will be three years to update the Countywide Planning Policies and then update our jurisdictional comprehensive plans with growth targets to 2043. Our concerns about the timing are two-fold:
 - The timeframe for the updates to CPPs and then local comprehensive plans is very compressed in comparison to the previous cycles for updates to MPPs and local plans; and
 - Release of new county GMA projections by OFM in 2022 significantly adds to this complexity within an already compressed plan update timeframe.

Could you please provide a copy of these comments to the Growth Management Policy Board prior to their January meeting? Thank you.

Lastly, please feel free to contact us with any questions. Thank you, again, for the opportunity to comment in advance of determining the scope of the Vision 2040 update.

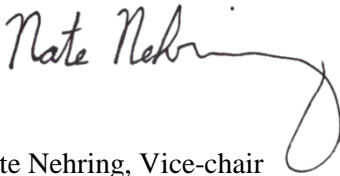
Sincerely,



Dave Somers, Co-chair
SCT Steering Committee



John Spencer, Co-chair
SCT Steering Committee



Nate Nehring, 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, Manager of External Affairs
Paul Inghram

From: enjohnston@gmail.com on behalf of Emily Johnston <enjohnston@350seattle.org>
Sent: Monday, March 19, 2018 9:29 AM
To: VISION 2050; Josh Brown
Subject: 350 Seattle statement on Vision 2050 scoping



Dear Puget Sound Regional Council,

Thank you for the opportunity to comment on the scoping process for Puget Sound Regional Council's Vision 2050. We represent [350 Seattle](http://350seattle.org), a grassroots group working 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.

Climate change is the most pressing challenge facing our region; Vision 2050 must make response to climate change a central theme. We've already experienced some of the devastating effects of climate change: raging wildfires, reduced mountain snowpack and summer water reserves, intensified rain events, and changes to the chemistry of Puget Sound. While these events have already caused damage, climate science indicates that, even if we radically reduce our greenhouse gas emissions now, more damaging events are on the horizon. Taking strong action now can still mitigate the worst catastrophes that climate change could bring.

Three main areas that must be included in Vision 2050:

1. Reducing our greenhouse gas emissions to the point of carbon neutrality.
2. Sequestering atmospheric carbon to return the concentration of carbon to a point where the climate can stabilize.
3. Adapting to, and becoming resilient in the face of, coming climate change.

Each area is discussed below.

REDUCING GREENHOUSE GAS EMISSIONS

In order to reduce greenhouse gas emissions, we must rapidly develop 100% renewable electricity production; make our buildings more efficient to heat, cool, and light; transition our transportation system to one that's fossil fuel-free; and moderate our consumer patterns.

Beginning in 1998, the residents of Samsø Island in Denmark invested in renewable energy —primarily wind, with biomass boilers for heating buildings. [Cite](#). Today Samsø residents boast a carbon footprint of negative 12 tonnes per person per year. And in recent years, five U.S. cities — Aspen, Colorado; Greensburg, Kansas; Burlington, Vermont; Kodiak Island, Alaska; and Rock Port, Missouri — have succeeded in switching to 100 percent renewables for their power needs. [Cite](#). San Francisco has committed to 100% renewables by 2030. The State of Hawaii has followed suit, committing to become 100% renewable, *including transportation*, by 2045, and efforts are being made to push this date forward. [Cite](#).

We must begin a similar plan here. Mark Jacobson, a Stanford University professor with the Solutions Project, has already investigated the portfolio of renewable energy that would bring Washington State to carbon neutrality. [Cite](#). Vision 2050 must study what portfolio of renewable energy will meet the electricity needs of the four-county area, and specifically consider the distribution of renewable energy production, and the question of whether local control over energy production can benefit our communities.

Making our buildings efficient is another important goal. Demonstration projects like the Bullitt Center have show what that building design and technology looks like, and the mission of the NW Energy Coalition's Shift Zero project is the "rapid scaling of the adoption of Zero Net Carbon buildings." [Cite](#). Vision 2050 must study how to implement that rapid scaling, and PSRC must consider both building codes for new buildings and the retrofit of existing stock for efficiency.

Transitioning our transportation system to fossil-fuel-free is perhaps the most challenging of the issues. There are two main efforts here. First, all vehicles must be powered by electricity **as soon as possible**; EV prices are falling fast, and corporations like FedEx and UPS are piloting electric delivery. Government fleets must take the lead and become fully electric as soon as possible. Vision 2050 must also include a plan to install sufficient charging stations to meet demand. We also need a plan to phase out gas stations and to clean up the toxic contamination that is associated with many of them.

Electrification of vehicles will not alone address the carbon emissions problem in our transportation system. Given our expected population growth, our congested roads will not be able to support a system that continues to be based on private vehicles. Thus, transit and "active transportation" must be made affordable, safe, accessible, and functional for everyone. We are encouraged that PSRC has already put forward its Growing Transit Communities initiative. To support a system based mostly on transit, we need to develop denser and more compact communities throughout the region. We need to "retrofit suburbia." There is significant guidance for this in the work of Ellen Dunham Jones and the Urban Land Institute. [Cite](#). Vision 2050 should incorporate these development approaches.

In these transit-served centers we need to be sure to include sufficient affordable housing. Currently, in the Seattle area, lower-income workers are being priced out of the housing market and are moving to the more affordable suburban areas that are poorly or not at all served by transit. In Los Angeles, transit ridership has actually *declined* due to the fact that neighborhoods around transit corridors are gentrifying, and lower-income families who depend on transit are displaced. [Cite](#). Vision 2050 should include plans to insure that ample affordable housing is located in transit-served areas.

The benefits of these land-use changes extend far beyond a reduction in greenhouse gases. Walkable transit-served communities promote public health by integrating gentle exercise into the transportation system. Mixed-use and compact development can also make walking and biking practical as people can easily reach retail and services from their homes by walking or biking. These walkable centers can also foster social cohesion, as people encounter each other on the sidewalk and bike paths. Social cohesion can help foster a

local culture that creates public art and performance and thereby makes these centers loved by their residents and memorable to visitors. As noted below, social cohesion also fosters resiliency. 2050 needs to put forward a vision of what makes walkable, transit-served communities appealing. Otherwise we risk simply building transit centers out to park-and-rides at the exurban fringe, and continuing the sprawl that contributes to climate change.

The goods that we in this region consume have GHG emissions both inside and outside the region's boundary—and some of the GHG emissions within the region result from the production of goods consumed outside our region. However, **the GHGs associated with our consumption are significantly higher than the GHG emissions within our boundary.** A King County study found that our per capita consumption-based GHG footprint was more than twice as high as our in-state emissions. [Cite](#). In addition, the movement of goods within the region is causing an increase in our carbon footprint as we move to overnight distribution plans offered by on-line retailers, such as Amazon's Prime. Finally, the packaging and waste disposal created by our consumer system require yet more GHG emissions.

Vision 2050 must consider how the outsized carbon footprint of our consumer behavior can be reigned in. What is the green distribution system of tomorrow? How can the "sharing economy" reduce the carbon footprint of our consumer behavior? How can we increase public awareness of such options? Vision 2050 must create the picture of the sustainable consumer patterns of the future.

CARBON SEQUESTRATION

Becoming carbon-neutral is not sufficient. The atmosphere has over 400 ppm of CO₂, and we need to return to a maximum of 350 ppm to stabilize the climate system. We will therefore need to sequester carbon from the atmosphere. Fortunately, our forest management, agricultural, and building practices can be part of the solution. Sequestration strategies must be evaluated for our region, and Vision 2050 must describe how we can incorporate these strategies in our forest management agricultural, and building practices.

We are pleased to see the commitment to open space that PSRC has articulated. Vision 2050 must also explicitly combine the effort of preserving open space with a plan to maximize its carbon sequestration. [Cite](#) and [cite](#). In addition, PSRC must develop a plan to maximize carbon sequestration of building materials—particularly in wood products, which sequester carbon for the life of the building. [Cite](#). So-called "green concrete" products may also sequester carbon, but are still under development. [Cite](#).

ADAPTATION AND RESILIENCE

The University of Washington's Climate Impacts Group has indicated that due to climate change, the Puget Sound area can expect:

- Substantial warming
- Increasing heavy rainfall
- Changes in hydrology
- Sea-level rise
- Changes in ocean conditions

These trends will require us to adapt our infrastructure. For example, increased rainfall will cause local flooding, unless we change our stormwater infrastructure. In addition, we will need to change our behavior. For example, we may need to find ways to reduce water consumption during the summer months as our snowpack diminishes and our summer water supplies are reduced. Finally, our communities will need to become more resilient so they can recover from or adapt to climate change challenges.

One significant lesson from how communities in NYC recovered in the aftermath of Hurricane Sandy is that the social cohesion of neighborhoods correlated with how well those communities recovered from the storm. “Communities where residents had stronger and more active social ties were better able to utilize these social networks to adapt, respond, and recover from Sandy” [Cite](#). Building cohesion in vulnerable communities is valuable both inherently and in terms of its ability to strengthen community resilience. Vision 2050 must study and recommend planning measures that can promote social cohesion in our communities.

Climate change is also expected to bring new challenges to our public health system — these include new disease epidemics as climate change shifts the vectors for communicable disease, heat-related deaths, and respiratory ailments caused by poor air quality. Vision 2050 must study planning measures that can help our health care system and emergency responders prepare for these challenges.

Climate change causes deeper impacts to lower-income and historically oppressed communities. One clear example: Georgetown and neighborhoods along the Duwamish are home to lower-income communities and communities of color. These areas are also most at risk for sea-level rise, and hit hardest by the air pollution and associated health impacts of nearby Port of Seattle facilities and the Duwamish industrial zone. [Cite](#). Throughout our region, lower-income communities will suffer more from the public health and infrastructure impacts that climate change will bring. **Vision 2050 must address this disproportionate impact by analyzing community investments that will help these communities remain resilient in the face of climate change.**

PSRC must make facing the climate crisis the top priority in Vision 2050. If we do not address climate change, we will leave a profoundly inhospitable world to our children.

We recognize that the changes outlined above are substantial. They require a significant mobilization on the part of local jurisdictions, and some may fall short. Vision 2050 must include the moral argument for taking action. It must also include a plan for measuring progress toward these goals, and a system of incentives and penalties that ensures compliance. PSRC may be reluctant to employ measures that may be viewed as “heavy handed,” but **climate change is an unprecedented risk and responding to it requires extraordinary measures. PSRC’s Vision 2050 needs to be a bold and clear vision of how our region will do all that is needed to both limit the damage of climate change and prepare for the changes to come.**

Thank you again. We look forward to remaining engaged over the coming two years as PSRC puts together this critical plan.

Sincerely,

Emily Johnston, Board President
Andrew Kidde, Transportation team lead
350 Seattle

March 19, 2018

VIA EMAIL DELIVERY

VISION2050@psrc.org

Erika Harris, AICP
Senior Planner
Puget Sound Regional Council
1101 Western Avenue, Suite 500
Seattle, WA 98104

Re: Comment on Vision 2050 Scoping Notice
School Siting in the Rural Area

Dear Ms. Harris:

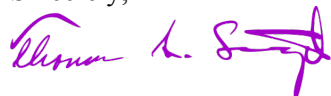
Thank you for the opportunity to comment on the Scoping Notice for VISION 2050.

As you are aware, the Growth Management Act (GMA) neither classifies “schools” as either urban or rural “services”. Consistent with the GMA’s recognition that schools shall not be deemed exclusively an “urban service” like sewer or water services, in the 2017 Regular Legislative Session, the State Legislature adopted HB 1017 to ensure providing constitutionally mandated adequate public schools (serving urban and rural students) are available in either the urban or rural area in the Puget Sound region. A companion legislative direction (HB 2243) was adopted in the Third Extraordinary Session to authorize counties to extend urban public facilities and utilities to serve a school sited in a rural area that serves students from a rural area and an urban area upon the adoption of certain findings. It is clear that flexibility in siting schools is a critical governmental function.

As VISION 2040 declares, the Multi-County Planning Policies (MPPs) provide “overall guidance and direction for planning processes” and “serve as planning guidelines”. With the proposed update to the guidelines (MPPs) under VISION 2050, we believe that the update provides an opportunity to adopt guidelines consistent with the intent of the GMA and the recent GMA legislation to address siting schools serving both urban and rural students in the rural area as may be necessary.

Although RCW 36.70A.211(1) does not require, as a condition precedent, an update to the MPPs, provides recognition that flexibility in siting schools is necessary to ensure *land suitable* for development to accommodate appropriate educational facilities to fulfill the preeminent duty established under Washington’s Constitution to provide adequate public education as administered through the local school board.

Sincerely,



Thomas G. Seigel
Superintendent
Bethel School District No. 403



Erika Harris, AICP, Senior Planner
SEPA Responsible Official
Puget Sound Regional Council
1011 Western Ave., Suite 500
Seattle, WA 98104

March 19, 2018

Re: Puget Sound Regional Council's Vision 2050 Scoping Notice

Dear Ms. Harris:

Community Transit appreciates the opportunity to provide comments for the proposed environmental review and planning for Puget Sound Regional Council's (PSRC) Vision 2050. Community Transit provides Snohomish County with a full range of multi-modal transportation options to move people and connect communities.

In 2011, Community Transit adopted its Long Range Transit Plan, developed in coordination with local cities and Snohomish County. The plan includes a Swift bus rapid transit (BRT) network connecting major residential and employment centers as well as providing linkages to Sound Transit's regional light rail and BRT systems. Community Transit, along with state and federal partners, is investing hundreds of millions of dollars to build out the Swift BRT network. The Swift Blue Line began service in 2009. The Swift Green Line is under construction now and will open for service in 2019. The Swift Orange Line and Blue Line Extension are under development and will begin service in 2024. The full Swift network (see attached map) will be complete in the 2030s.

The following comments were prepared in response to the Scoping notice for PSRC's Vision 2050:

- We encourage Vision 2050 to acknowledge and leverage major regional transit investments. The draft alignments and preliminary station locations for these projects are based, in large part, on locally adopted land use plans.

To take full advantage of this significant investment, residential and employment growth should be allocated around the high capacity transit stations. All the planned Swift BRT and Link light rail stations are within an urban growth area, but not necessarily within a center or city.

Community Transit suggests the transportation analysis include an evaluation of how each alternative maximizes use of these transit investments.

- We suggest the plan evaluate the impacts of emerging trends and technologies such as autonomous vehicles, electric and hybrid energy, transportation network companies (TNCs – Uber, Lyft, etc.) and SMART cities.
- Community Transit supports the current Vision 2040 strategy for containing urban sprawl and directing future growth to existing growth boundaries.
- We support the efforts of Snohomish County Tomorrow, and concur with the comments made in the December 7, 2017 letter sent to PSRC Executive Director Josh Brown.

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,

A handwritten signature in black ink, appearing to read "Joy Munkers". The signature is fluid and cursive, with the first name "Joy" being more prominent than the last name "Munkers".

Joy Munkers
Director of Planning & Development
Community Transit



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ENVIRONMENTAL REVIEW
AND ASSESSMENT

March 19, 2018

Ms. Erika Harris
State Environmental Policy Act Responsible Official
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, Washington 98104-1035

Dear Ms. Harris:

The U.S. Environmental Protection Agency has reviewed the Puget Sound Regional Council VISION 2050 Plan and the State Environmental Policy Act Supplemental Environmental Impact Statement Scoping Notice (EPA Region 10 Project Number 18-0012-MPO). The VISION 2050 Plan will build on the existing regional growth strategy, VISION 2040, intended to support a healthy and vibrant Central Puget Sound region as it continues to grow in population. We appreciate the opportunity to engage early and participate in the PSRC transportation planning discussions, and we are offering the following scoping recommendations for consideration as the PSRC determines the topics to include in the SEPA EIS and the VISION 2050 Plan.

First, we recommend the following subjects be considered for analysis and disclosure in the SEPA EIS:

- Water quality, including any effects to waterbodies listed as impaired on the most current Clean Water Act Section 303(d) list and how the project will ensure that the state water quality standards and antidegradation implementation procedures are met;
- Water supplies, including both surface and groundwater sources of municipal/public drinking water supplies, commercial and industrial water usage;
- Impacts to floodplains, estuaries, shorelines, wetlands, streams and riparian areas, including impacts to Puget Sound salmon, shoreline armoring/nearshore habitat; forage fish; marine debris and microplastics;
- Air quality and air toxics pollutants, including climate effects on the region and how changes in climate will affect environmental resource needs and ecosystem services;
- Infrastructure needs and costs; including energy demand, provision of affordable housing and potential displacement, transportation choices, induced travel and growth, efficiency of freight movement, and emergency services;
- Livability, walkability, accessibility, health and well-being, and sustainability issues;
- Priority habitats and species of concern under the Endangered Species Act, high biodiversity areas, open space, and protection of farm and forest lands;
- The indirect and cumulative effects of the project;
- Environmental Justice considerations;
- Tribal Treaty Rights; and,
- The project's capacity for adaptive management over time.

In addition to considering the scope of the SEPA EIS, the EPA recommends PSRC and its members continue to uphold the principles of VISION, which fundamentally support the goals of the Growth Management Act and the region's social, economic, and ecological sustainability. In order to strengthen the preparation and planning for continued rapid growth and to support the successful implementation of VISION, we recommend the VISION 2050 update include:

Recognition that air quality and water quality protection are regional concerns and responsibilities. While we benefit from the national fuel and engine standards, the increased vehicle miles traveled (VMT) from current and projected growth in the Region can offset the associated air quality benefits of these standards--possibly before 2050. We know that even electric vehicles produce emissions and create impacts from brake and tire wear and re-entrained road dust. The EPA recommends VISION 2050 evaluate the impacts of vehicular emissions on both air and water quality, as sound planning and decision making are essential to prevent large VMT increases and their associated air and water quality impacts. We recommend additional focus areas for VISION 2050 could include diesel reduction and freight-specific measures, and we further recommend working closely with the Puget Sound Clean Air Agency, freight haulers and businesses generating increased freight demand, such as online order and delivery, when including relevant measures in the 2050 update.

Special attention to human health and livability factors in all centers and densified environments. Some examples could include low impact development that, in addition to reducing storm water runoff, also includes green landscaping/use of native plants, reduced light pollution, and bird-safe windows; car-free zones and corridors together with community centers, public gathering places, and public transportation; reduced air and noise pollution; and providing access to healthy foods, gardening opportunities (e.g., rooftop gardens and pea patches) and local farmlands, among others.

In particular, we recommend VISION 2050 could plan for and design human environments that minimize exposure to air and noise pollution from transportation sources, including roadways, railways, and airports. For example, the plan could incorporate features to reduce effects from vehicular air toxics emissions,¹ and ensure that such mitigation actions are equitably applied to reduce disproportionate impacts to vulnerable communities.

Adopting the means to effectively accelerate the protection, conservation, and restoration of open space. The EPA previously submitted recommendations on the Draft Regional Open Space Conservation Plan on March 8, 2018. In addition to those recommendations, we encourage the PSRC to include open space goals and expectations in the VISION 2050 Plan that:

- Fully support the restoration of Puget Sound health;
- Protect all known or newly identified priority habitats, federal and state threatened and/or endangered species, critical areas and areas of high biological diversity;
- Maintain or restore ecological connectivity and structure within and among aquatic and terrestrial habitats to support species movement, hydrological and other natural ecosystem functions and services; and,
- Exceed current and projected local and regional needs in order to provide for future generations and growth beyond the planning horizon of 2050.

¹<https://www.epa.gov/sciencematters/living-close-roadways-health-concerns-and-mitigation-strategies>

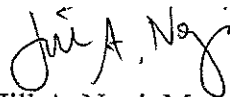
Increased emphasis in PSRC planning and decision making. Under VISION, decisions are to be based on a triple bottom line including people, prosperity, and the planet. We recommend the PSRC increase the emphasis during planning and decision making to include the environmental impacts related to population growth in the central Puget Sound region.

Embracing the goal of transforming communities and neighborhoods. We recommend that the VISION 2050 Plan include opportunities that:

- Ensure that public transportation and non-motorized infrastructure can serve all regional communities, including disadvantaged and disproportionately impacted communities;
- Improve outreach related to land use and transportation planning processes to more effectively reach, communicate with, and meaningfully involve disadvantaged and disproportionately impacted populations in regional planning efforts;
- Convey the anticipated benefits and impacts of proposed actions to inform all communities. For example, there may not be a common understanding of the construction, operation, and maintenance impacts that may result from a proposed project. We note that some typical development project impacts may include exposure to air pollution, noise and light pollution, safety hazards (such as, for disabled, seniors, pedestrians, school children), and impaired access to environmental benefits, among others; and,
- Provide access to healthy food and open space to support all communities across the region, including low income, minority, and other disproportionately impacted populations.

Thank you for the opportunity to participate in the planning for the VISION 2050 update. If you would like more information about any of these recommendations or have questions, please contact Elaine Somers of my staff at 206-553-2966 or at somers.elaine@epa.gov, or you may contact me at 206-553-1841 or at nogi.jill@epa.gov.

Sincerely,



Jill A. Nogi, Manager

Environmental Review and Sediment Management Unit



March 19, 2018

To: Paul Inghram (pinghram@psrc.org)
Senior Program Manager
Growth Management Planning
PSRC

Re: PUBLIC COMMENTS—DRAFT VISION 2050 Plan and SEPA Scoping Notice

Mr. Inghram,

Please accept the Greater Maple Valley Unincorporated Area Council's (GMVUAC's) Public Comments herein on the PSRC's *DRAFT VISION 2050 Plan and SEPA Scoping Notice*. We represent and advocate with King County, the PSRC, WA State officials, and other organizations for the interests of approximately 18,000 people who live in our Rural Area of King County.

We see the *VISION 2050 Plan* as a forward look at regional issues and a framework to address future challenges. Only the PSRC can ensure a regional focus to bring different jurisdictions together to solve collective problems. In so doing, we seek to keep the Rural Area rural by ensuring largely urban-serving facilities are sited in Urban Growth Areas. Further, we look to the PSRC to enforce agreed-to Growth Targets to ensure jurisdictions do not unduly burden their neighbors. These and many other efforts will help us achieve a truly sustainable vision for the year 2050.

The PSRC provides a great opportunity to bring together State and City governments, UACs, private groups, and individual citizens within a four-county area. In this regional role, we believe the PSRC is in a unique position to effectively break down organizational "silos" to achieve lasting regional solutions. Only the PSRC has this type of flexibility and scope of regional planning responsibilities.

We wish to continue an open dialogue with the PSRC on the *VISION 2050 Plan* and its pertinence to Rural Area issues, as we work on the plan details leading to its eventual approval and implementation.

Thank you for your consideration of our comments.

Hendrick Haynes
hh.gmvuac@gmail.com
Chair
Economic Dvmt. Committee
GMVUAC

Rhys Sterling
rhyshobart@hotmail.com
Chair
Environment Comm.
GMVUAC

Peter Rimbos
primbos@comcast.net
Chair
Growth Mgmt. Comm.
GMVUAC

Susan Harvey
susandharvey@hotmail.com
Chair
Transportation Comm.
GMVUAC

Steve Hiester
Chair
GMVUAC
gmvac_chair@hotmail.com

cc: Josh Brown, Executive Director, PSRC: jbrown@psrc.org
King County Council: rod.dembowski@kingcounty.gov, Larry.Gossett@kingcounty.gov,
kathy.lambert@kingcounty.gov, jeanne.kohl-welles@kingcounty.gov, Dave.Upthegrove@kingcounty.gov,
claudia.balducci@kingcounty.gov, Pete.vonReichbauer@kingcounty.gov, joe.mcdermott@kingcounty.gov,
reagan.dunn@kingcounty.gov
Alan Painter, Manager, King County Community Service Areas: alan.painter@kingcounty.gov
Ivan Miller, Comprehensive Planning Mgr., King County: ivan.miller@kingcounty.gov

VISION 2050 Plan and SEPA Scoping Notice

GMVUAC COMMENTS

(Cover page): PSRC is extending the region's growth plan to 2050.

VISION 2050 will build on the region's existing plan, VISION 2040, to keep the central Puget Sound region healthy and vibrant as it grows.

As the region prepares to add more people and jobs in the coming decades — about 1.8 million more people by 2050 — VISION 2050 will identify the challenges we should tackle together as a region and renew the vision for the next 30 years.

COMMENT:

1. How will the integrity of the Urban Growth Boundary should be maintained as the region seeks to accommodate 1.8 million new people.
2. What land-use, transportation, and social system adjustments are implied?
3. What land-use policy changes may be needed to encourage development patterns that work together with high-capacity transit systems to serve growth at an adequate level of service?
4. What re-thinking of financial funding strategies may be needed to accommodate growth of this magnitude?
5. How can rural areas be protected from infringements of urban growth (e.g., “pass-through” commuters)
6. How can marginalized segments of society (e.g., the poor, racial minorities, the elderly, etc.) be protected from the adverse impacts of this prosperity-driven growth for the majority segment of the population?
7. How can the PSRC, as the State-designated Regional Planning Organization, and given the growth to come, ensure jurisdiction (County and City) comprehensive plans are properly implemented and followed?

(p. 1): VISION 2040 helps to coordinate the local growth and transportation plans developed by cities and counties to make sure they are consistent with the Growth Management Act and regional transportation plans.

The Puget Sound Regional Council (PSRC) is the planning agency for the central Puget Sound region, which includes King, Pierce, Snohomish and Kitsap counties. PSRC has specific responsibilities under federal and state law for transportation planning and funding, economic development, and growth management.

PSRC is updating VISION to consider new information and perspectives about a changing region. PSRC is seeking community input to shape the plan.

What important regional issues should we focus on during the update?

COMMENT: Implementing Regional Transportation Concurrency to ensure “pass-through” traffic is addressed ahead of time at the development stage.

How should the region's growth strategy be updated to plan for 2050?

COMMENT: Although there are set Growth and Job Targets, without sufficient jobs generated within a jurisdiction, its growth simply leads to more intolerable traffic congestion

As we consider different ways to grow as a region, what impacts and actions should be evaluated through environmental review?

COMMENT: Cities on the urban fringe and with single-spine ingress/egress road infrastructure (e.g., Black Diamond) should not be allowed to exceed their Growth Targets, especially, grossly

VISION 2050 Plan and SEPA Scoping Notice

exceed them, as this would disturb growth plans and patterns throughout large sub-regional areas (e.g., SE King County).

Over the next two years, PSRC will work with cities, counties, tribes, other agencies and interest groups, and the public to develop VISION 2050. PSRC will engage the public through surveys, workshops held throughout the region, formal comment periods, and input to PSRC's elected board members.

COMMENT: It should be recognized “counties” include Unincorporated Area (both Urban and Rural) citizens whose voices should be part of the VISION 2050 development process.

(p. 1): Graph: Population and Employment Growth in the Central Puget Sound Region

PSRC's draft forecast shows 1.8 million more residents and 1.2 million more jobs in the region by 2050.

(p. 2): Planning as a REGION

Since 2010, the region has experienced significant growth with about 375,000 new neighbors calling the central Puget Sound home. Meanwhile, major infrastructure investments — like completing the 520 bridge and extending light rail from Everett to Tacoma to Redmond — are moving forward.

The region has had important successes implementing VISION 2040, which helps to fulfill the goals of the state Growth Management Act (GMA). The plan has helped coordinate state and regional initiatives and supported local decisions. Cities are thriving. Regionally, growth is shifting towards more compact, sustainable development occurring within urban areas and cities, with cost effective and efficient services, reduced impacts on the environment, and positive health outcomes.

COMMENT: Unfortunately, this is not the case with the approved Master-Planned Developments (MPDs) in the cities of Black Diamond (2) and Covington (1). While the concept of MPDs might be good, their placement on the urban fringes where few if any jobs exist or will be generated, simply adds to already-intolerable traffic congestion.

COMMENT: New businesses and multi-unit residences should provide their own parking *within* their building footprints, e.g., parking availability under the building, thus not wasting valuable land and creating more “heat-islands” of asphalt.

At the same time, the region continues to face significant challenges, including the climbing cost of housing. Congestion from rapid growth is reducing access to jobs, services, and housing. While recent economic growth has been strong, prosperity hasn't benefited everyone or all parts of the region. Finally, pressing environmental issues, such as climate change and preserving open space, require more collaborative, long-term action. VISION 2050 is an opportunity for cities and counties to work together to address the key challenges that extend beyond the boundaries of any single community.

COMMENT: While these are admirable goals, all too often each city works within its own “*silo*,” especially when it comes to transportation infrastructure planning related to its own development. Without instituting the concept of: “*Regional Transportation Concurrency*,” this is an ever-increasing race to the bottom, one which will result in even more gridlock, thus choking the region's economy and further harming its quality of life. That said, it must be acknowledged current Concurrency laws often are interpreted in ways that effectively gut their intent.

(p. 3): What is in VISION 2040 ?

VISION 2040 is the region's current plan for managing growth forecasted through the year 2040. The plan includes overarching goals, an environmental framework, a strategy to sustainably guide growth in the region, and multicounty planning policies. The plan also includes actions at the regional, county, and local level to

VISION 2050 Plan and SEPA Scoping Notice

make the plan a reality. VISION has six chapters addressing the environment, development patterns, housing, the economy, transportation, and public services.

The plan includes goals and policies to:

- Protect and restore the natural environment and reduce greenhouse gas emissions.
- Plan for growth in cities and urban centers, while reducing sprawl.
***COMMENT:** Add at the end of this bullet: "...and protecting the integrity of the Rural Areas."*
- Improve the balance of jobs and housing across the counties.
- Create more vibrant and resilient urban centers.
- Support health, well-being, and active living.
- Provide affordable housing choices to meet the needs of all residents.
- Improve mobility for people and goods.
- Maintain and operate the transportation system safely and efficiently.
- Encourage a strong, diverse economy.
- Provide services like solid waste, energy, and water systems to support the region's growth.

VISION 2040's Regional Growth Strategy defines a role for different types of places in accommodating the region's residential and employment growth. The strategy is organized around guiding most employment and housing growth to the region's largest cities and urban centers. Other cities and unincorporated urban areas are expected to play a more modest role as locations for new growth. Outside the urban area, rural communities, farms and forests will continue to be a permanent and vital part of the region.

Environmental review for VISION 2040 showed that, compared with a broad range of alternatives, the desired growth pattern would have significant benefits for mobility, air quality, environmental stewardship, and healthy communities.

(p. 4): **Map: VISION 2040 Regional Growth Strategy** (VISION 2040 guides most new growth to cities and urban areas)

(p. 5): **Maps: Where Growth is Happening** (Growth has been focused in the urban area. In 2015, for example, 96% of new permitted housing was in cities and urban areas AND 290,000 jobs have been added to the region since 2000, with strong growth in employment centers along the I-5 corridor)

(p. 6): **SCOPING and Environmental Impact Statement Process**

Determination of Significance and Request for Comments on Scope of Environmental Impact Statement

VISION 2050 Plan and SEPA Scoping Notice

PSRC has proposed to update and revise the long-range growth, economic, and transportation strategy for King, Pierce, Snohomish and Kitsap counties. PSRC, as lead agency for environmental review, has determined that the proposal to update VISION 2040 is likely to have significant adverse impacts on the environment, and is therefore issuing a Determination of Significance (DS). This notice announces PSRC's intent to prepare a supplemental environmental impact statement (SEIS) on the proposed update to VISION 2040, pursuant to RCW 43.21C.030(2)(c). The SEIS will contain new information and analysis, and may also build on data and analysis contained in existing environmental documents, any of which may be adopted or incorporated by reference as appropriate, according to State Environmental Policy Act (SEPA) rules. The process will integrate SEPA and GMA to allow for consideration of environmental information as well as public input, and to assist decision makers in meeting the goals of GMA while identifying and mitigating probable significant adverse environmental impacts under SEPA.

Under the SEPA process (WAC 197-11-408), PSRC is completing a scoping period to inform the environmental review process for the VISION 2040 update. Pursuant to SEPA, PSRC is notifying the public of the intent to prepare an SEIS so that residents, jurisdictions, agencies, and tribes have an opportunity to comment on the scope of the impacts to be analyzed. Affected members of the public, jurisdictions, agencies, and tribes are invited, by this notice, to comment on alternatives, mitigation measures, probable significant adverse impacts, and licenses or other approvals that may be required. The method and opportunities for comment are provided on page 11.

(p. 7): Input on Environmental Review

PSRC is seeking input on environmental issues for analysis.

Natural and built environment. PSRC has identified the following environmental areas for potential discussion in the SEIS:

- Land use and population; employment; housing; transportation; air quality; ecosystems; water quality; public services and utilities; parks and recreation; environmental health; energy; visual quality and aesthetic resources.
- The scoping process may be used to expand or narrow the environmental areas that need updated analysis.

Additional issues that may be addressed. In addition to the areas listed above, PSRC contemplates that environmental analysis may address the following subjects, which may be modified in response to public comments and further analysis:

- 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.
- Some issues may be addressed by existing information in the VISION 2040 Environmental Impact Statement (EIS). Other issues may require new information or analysis.

(p. 7): Graph: Increasing Median Housing Costs

Nationally, the region is at or near the top among peer regions in annual housing cost increases

Scoping Question:

VISION 2050 Plan and SEPA Scoping Notice

What issues should be considered for environmental review?

COMMENT: Traffic congestion and its contributions to air and water pollution and increase in greenhouse gas emissions.

(p. 8): Input on Assumptions, Themes, and Issues

PSRC is seeking input on key assumptions to inform the plan update. This SEIS will build on the VISION 2040 EIS and include information analyzing the environmental impacts of updating VISION 2040.

- **Plan for 2050.** A new regional forecast will show expected employment and population through 2050. PSRC is planning for 1.8 million more people and 1.2 million jobs by 2050.
- **Implement the Growth Management Act.** VISION 2050 will continue to further the Growth Management Act's objectives of preventing sprawl; conserving farmlands, forests, and open spaces; supporting more compact, people-oriented communities; focusing a significant amount of new employment and housing into vibrant urban centers; and coordinating between local governments.
- **Use VISION 2040 as starting point.** PSRC will build on VISION 2040's current framework — goals, policies, and Regional Growth Strategy — as the starting point for developing VISION 2050.
- **Focus on emerging and important issues.** To efficiently use public resources and time, the plan update will focus on a limited set of issues that may benefit from additional regional discussion, coordination, and planning. Issues such as housing affordability, climate change, social equity, and shared economic prosperity have been discussed as key regional challenges.
- **Reflect the diversity of the region.** The plan update will seek to reflect the demographic, cultural, geographic, and economic diversity of the region.
- **Review trends and actions.** Key data trends will inform the update, as well as progress towards implementing the actions contained in VISION 2040. The update will identify actions and roles to realize the goals of VISION 2050 and outcome measures from which to measure progress.
- **Integrate recent initiatives.** The update will consider recent initiatives of PSRC and partners, such as recent local comprehensive plan updates, the Growing Transit Communities Strategy, Puget Sound Clean Air Agency climate change targets, the Puget Sound Partnership Action Agenda, and the Regional Centers Framework Update.
COMMENT: Will the PSRC's Regional Economic Strategy (2017) and PSRC's now-being-finalized Regional Transportation Plan be considered?
- **Acknowledge and leverage major regional investments.** Since VISION 2040 was adopted, voters have approved two Sound Transit ballot measures to expand high-capacity transit. Other regional transit agencies have expanded service, local governments have built key projects, and the state adopted Connecting Washington to fund major transportation projects. The update will address the impact of these investments on regional policies and strategies.
- **Update the document.** PSRC will review the existing plan for out-of-date information or statutory changes since the 2008 adoption of VISION 2040. PSRC will also look for opportunities to make VISION 2050 more accessible and usable.

Scoping Questions:

What regional issues should the plan address?

VISION 2050 Plan and SEPA Scoping Notice

COMMENT: How will primarily urban-serving facilities be kept out of the Rural Area where the land is less expensive, but necessary supporting infrastructure is lacking?

What information should guide the update?

COMMENT: A wide variety of sources including, at a minimum: demographic data, trend analyses, lessons learned, economic forecasts, traffic-demand models and analyses, environmental impacts, incentive programs, etc.

(p. 9): **Map: Planned Regional Transit System (2040)** (Transit investments are planned throughout the region to provide more transportation options)

COMMENT: SE King County is grossly undeserved with few, if sporadic, transit options.

(p. 10): **Input on framework for considering modifications to growth strategy.**

One purpose of this scoping process is to gain information so that PSRC can craft a limited range of alternatives for analysis within the Draft SEIS. The existing Regional Growth Strategy will be considered in the context of recent and projected trends, adopted plans, infrastructure investments, and broad goals for the region. The wide range of alternatives studied for the VISION 2040 EIS provides a robust starting point for this process. Within the range of alternatives previously studied, several options may be available to modify the existing Regional Growth Strategy to more effectively achieve the region's sustainability goals. The alternatives that will be developed will use the same assumptions and forecasts for growth through the year 2050.

- **No Action Alternative.** A “no action” alternative must be evaluated in accordance with SEPA. In this proposal, the no-action alternative will be defined as continuing forward with the adopted growth patterns in VISION 2040, to essentially “stay the course.” The existing Regional Growth Strategy would be extended to reflect forecasts for 2050 without amendment or revision to growth shares or regional geographies.

- **2050 Modified Regional Growth Strategy Alternative(s).** A modified 2050 growth strategy(ies) may be defined and evaluated with modified regional geographies, adjusted growth allocations among counties and regional geographies, and/or actions to promote the desired pattern of future population and jobs.

COMMENT: Such modifications should not simply “grandfather” in those jurisdictions, often on the urban fringe, which have grossly exceeded their Growth Targets and seek adjustment of same to accommodate their bad decisions.

Scoping Question:

How should the region's growth strategy be updated to plan for 2050?

COMMENT: Growth should be truly focussed on Regional Growth Centers, not in cities on the urban fringe. In fact, no changes (i.e., increases) in Growth Targets for such cities should be entertained by the PSRC and the Growth Management Policy Board. In addition, when “conditionally” approving Comprehensive Plan updates for such cities, the PSRC should not hedge on these principles, nor allow such cities to reclassify as the next larger category of city, as the City of Covington was allowed to do in 2017. Such cities should be denied by the PSRC any and all Federal Highway funding and such policies should be clearly promulgated.



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

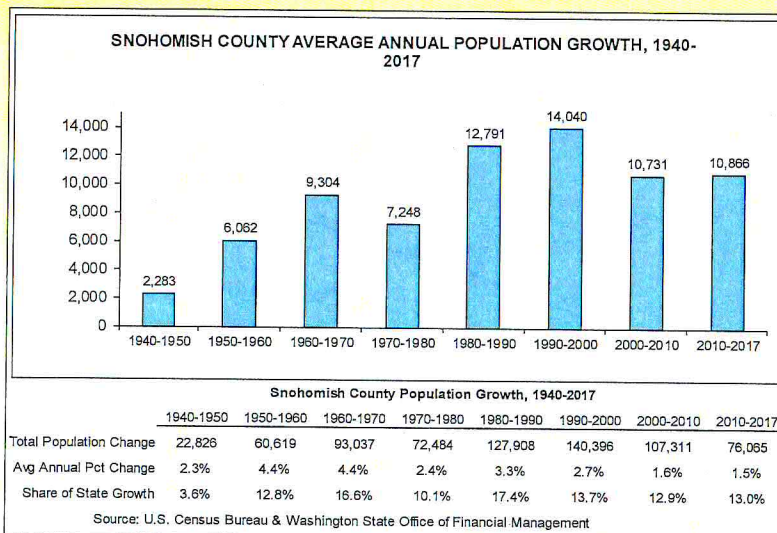
cc: Josh Brown, Executive Director, Puget Sound Regional Council

SNOHOMISH COUNTY TOMORROW 2017 GROWTH MONITORING REPORT

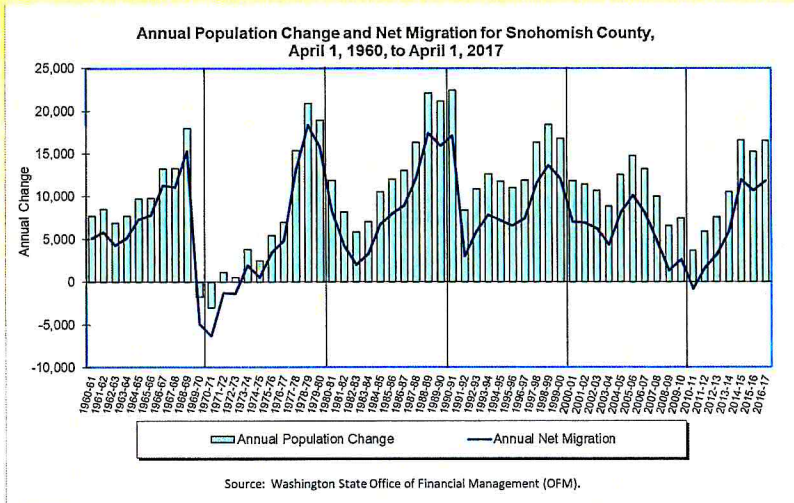
POPULATION GROWTH TRENDS

SCT
Planning Advisory Committee
February 8, 2018

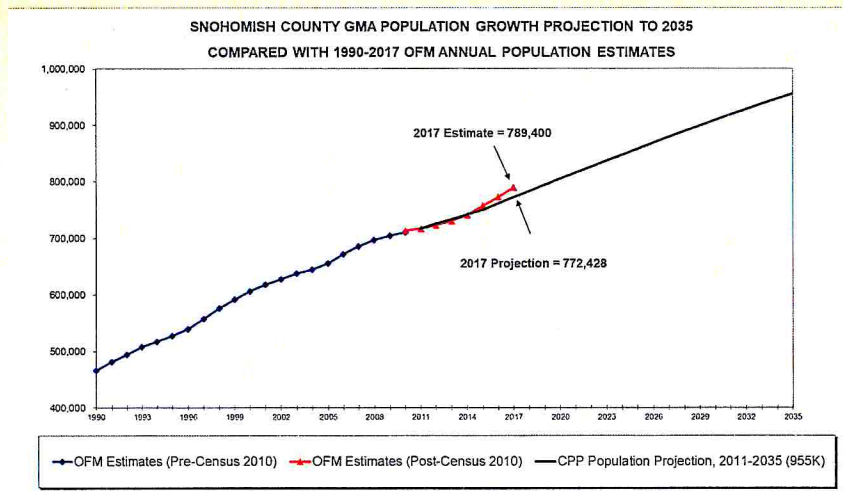
Population growth in Snohomish County has increased recently, resulting in average annual growth that now matches the pace observed in the 2000's



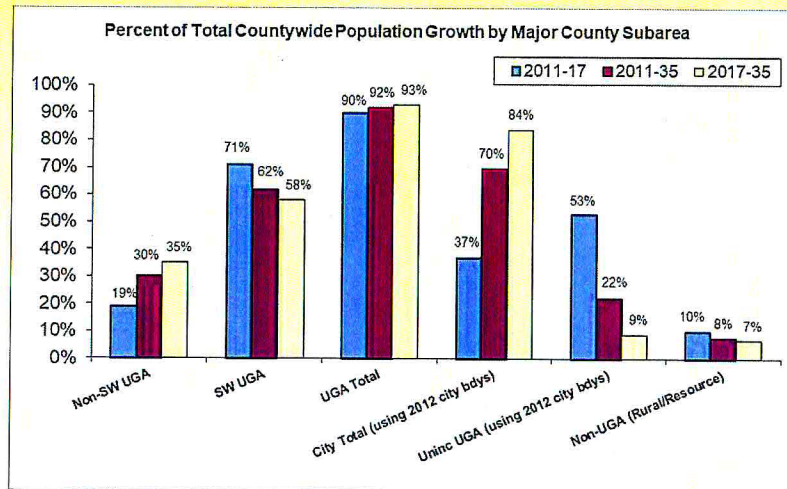
Population growth this decade has been driven by net migration gains during past 3 years



Snohomish County's population growth is tracking higher than the GMA 2011-2035 population projection

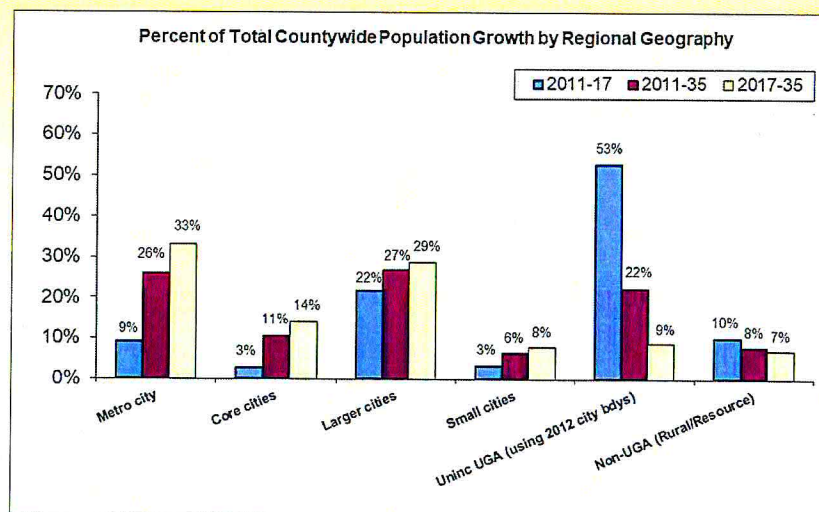


Challenges with planned shift of future population growth to cities from the unincorporated UGA are apparent

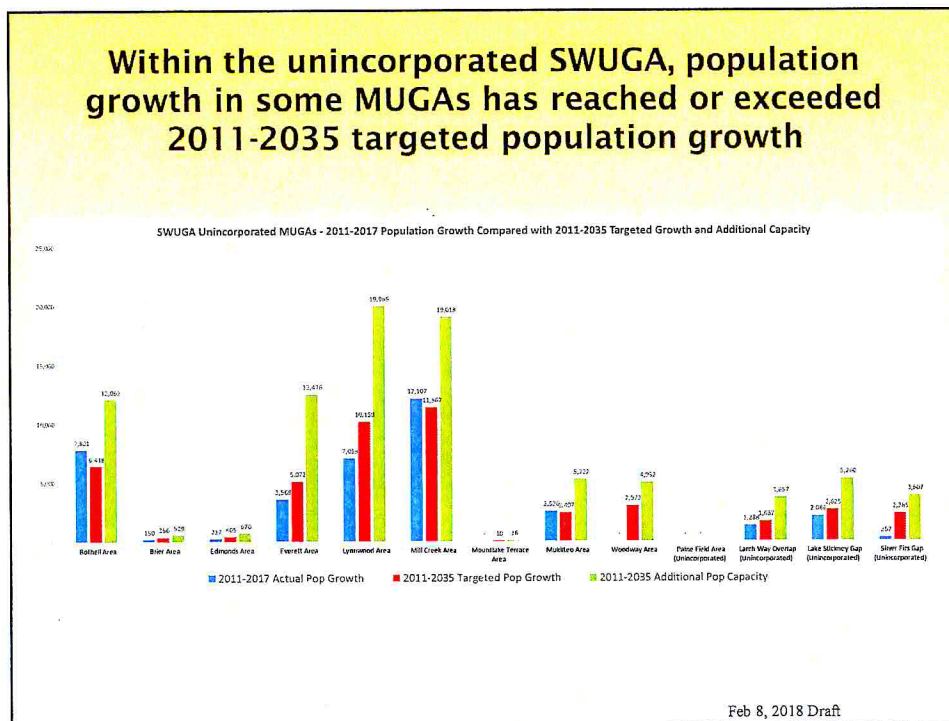
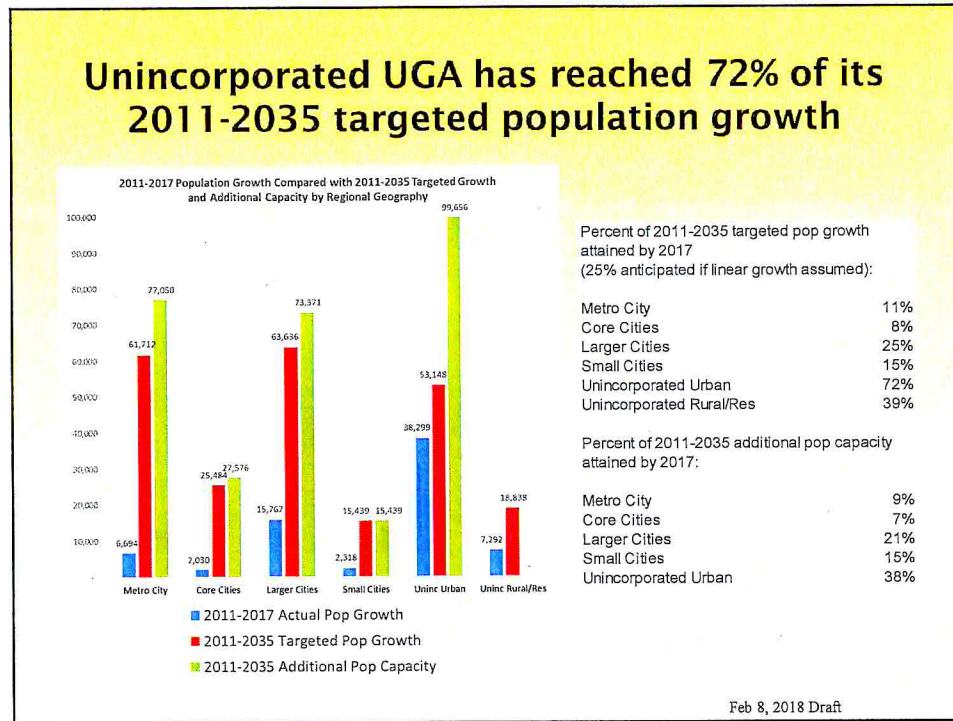


Feb 8, 2018 Draft

Challenges with planned shift of future population growth to cities from the unincorporated UGA are apparent



Feb 8, 2018 Draft



Snohomish County Tomorrow 2017 Growth Monitoring Report

Comparison of Annual April 1st Population Estimates with 2035 Population Targets for UGAs, Cities and the Rural/Resource Area
(all population estimates and targets below are based on December 13, 2012 city boundaries)

Area	Population Estimates (using Dec 13/2012 city boundaries)							2011-2017 Change		CPP 2035 Reconciled		
	2011	2012	2013	2014	2015	2016	2017	Amount	Pct of Total County Chng	Pop Targets (Dec 13/12 bdays)	2011-2035 Change Amount	Pct of Total County Chng
Non-S.W. County UGA	161,288	162,634	164,373	165,716	168,606	171,819	174,985	13,697	18.9%	233,097	71,809	30.1%
Arlington UGA	18,489	18,512	18,791	18,881	19,026	19,166	19,240	751	1.0%	26,002	7,512	3.2%
Arlington City	17,966	17,988	18,270	18,354	18,484	18,614	18,684	718	1.0%	24,937	6,971	2.9%
Unincorporated	523	524	521	527	542	552	556	33	0.0%	1,065	541	0.2%
Darrington UGA	1,420	1,420	1,425	1,426	1,429	1,431	1,481	62	0.1%	2,161	741	0.3%
Darrington Town	1,345	1,345	1,350	1,350	1,350	1,350	1,400	55	0.1%	1,764	419	0.2%
Unincorporated	75	75	75	76	79	81	81	7	0.0%	397	322	0.1%
Gold Bar UGA	2,909	2,915	2,933	2,952	3,013	3,047	3,064	155	0.2%	3,319	411	0.2%
Gold Bar City	2,060	2,060	2,080	2,085	2,115	2,125	2,125	65	0.1%	2,406	346	0.1%
Unincorporated	849	855	853	867	898	922	939	90	0.1%	913	65	0.0%
Granite Falls UGA	3,517	3,527	3,532	3,538	3,541	3,548	3,639	122	0.2%	8,517	5,000	2.1%
Granite Falls City	3,370	3,380	3,385	3,390	3,390	3,395	3,485	115	0.2%	7,624	4,254	1.8%
Unincorporated	147	147	147	148	151	153	154	7	0.0%	893	746	0.3%
Index UGA (incorporated)	180	180	180	180	160	165	175	(5)	0.0%	220	40	0.0%
Lake Stevens UGA	33,218	33,676	34,186	34,477	35,418	36,615	37,594	4,376	6.0%	46,380	13,162	5.5%
Lake Stevens City	28,210	28,510	28,960	29,170	29,900	30,900	31,740	3,530	4.9%	39,340	11,130	4.7%
Unincorporated	5,008	5,166	5,226	5,307	5,518	5,715	5,854	846	1.2%	7,040	2,032	0.9%
Marysville UGA	60,869	61,574	62,314	62,816	64,361	65,164	66,132	5,263	7.3%	87,798	26,929	11.3%
Marysville City	60,660	61,360	62,100	62,600	64,140	64,940	65,900	5,240	7.2%	87,589	26,929	11.3%
Unincorporated	209	214	214	216	221	224	232	23	0.0%	209	-	0.0%
Monroe UGA	18,806	18,846	18,987	19,153	19,139	19,661	19,913	1,108	1.5%	24,754	5,948	2.5%
Monroe City	17,351	17,390	17,510	17,660	17,620	18,120	18,350	999	1.4%	22,102	4,751	2.0%
Unincorporated	1,455	1,456	1,477	1,493	1,519	1,541	1,563	109	0.2%	2,652	1,197	0.5%
Snohomish UGA	10,559	10,576	10,579	10,643	10,786	11,049	11,449	890	1.2%	14,494	3,935	1.7%
Snohomish City	9,200	9,215	9,220	9,270	9,385	9,625	10,010	810	1.1%	12,139	2,939	1.2%
Unincorporated	1,359	1,361	1,359	1,373	1,401	1,424	1,439	80	0.1%	2,354	996	0.4%
Stanwood UGA	6,353	6,433	6,473	6,663	6,720	6,771	6,919	566	0.8%	11,085	4,732	2.0%
Stanwood City	6,220	6,300	6,340	6,530	6,585	6,635	6,783	563	0.8%	10,116	3,896	1.6%
Unincorporated	133	133	133	133	135	136	136	3	0.0%	969	836	0.4%
Sultan UGA	4,969	4,975	4,974	4,986	5,014	5,204	5,379	409	0.6%	8,369	3,399	1.4%
Sultan City	4,655	4,660	4,660	4,665	4,680	4,860	5,030	375	0.5%	7,345	2,690	1.1%
Unincorporated	314	315	314	321	334	344	349	34	0.0%	1,024	709	0.3%
S.W. County UGA	434,425	438,219	443,878	451,926	464,196	474,702	485,837	51,411	71.0%	582,035	147,610	62.0%
Incorporated S.W.	261,506	262,186	263,945	265,405	269,519	273,070	275,850	14,344	19.8%	363,413	101,907	42.8%
Bothell City (part)	16,570	16,720	17,020	17,020	17,230	17,390	17,510	940	1.3%	23,510	6,940	2.9%
Brier City	6,201	6,256	6,315	6,345	6,500	6,501	6,506	305	0.4%	6,972	771	0.3%
Edmonds City	39,800	39,800	39,950	39,950	40,490	40,900	41,260	1,460	2.0%	45,550	5,750	2.4%
Everett City	103,100	103,300	104,200	104,900	105,794	108,294	109,794	6,694	9.2%	164,812	61,712	25.9%
Lynnwood City	35,860	35,900	35,960	36,030	36,420	36,590	36,950	1,090	1.5%	54,404	18,544	7.8%
Mill Creek City	18,370	18,450	18,600	18,780	19,760	19,900	19,960	1,590	2.2%	20,196	1,826	0.8%
Mtlake Terrace City	19,990	20,090	20,160	20,530	21,090	21,090	21,290	1,300	1.8%	24,767	4,777	2.0%
Mukilteo City	20,310	20,360	20,440	20,540	20,900	21,070	21,240	930	1.3%	21,812	1,502	0.6%
Woodway Town	1,305	1,310	1,300	1,310	1,335	1,335	1,340	35	0.0%	1,389	84	0.0%
Unincorporated S.W.	172,919	176,033	179,933	186,521	194,677	201,632	209,987	37,067	51.2%	218,623	45,704	19.2%
UGA Total	595,713	600,852	608,251	617,641	632,801	646,521	660,821	65,108	89.9%	815,132	219,419	92.1%
City Total	412,723	414,574	418,000	420,659	427,328	433,799	439,532	26,809	37.0%	578,994	166,271	69.8%
Unincorporated UGA Total	182,990	186,278	190,251	196,982	205,473	212,722	221,289	38,299	52.9%	236,138	53,148	22.3%
Non-UGA Total (Uninc Rural/Resource Area)	121,287	122,047	122,249	123,359	124,798	126,339	128,579	7,292	10.1%	140,125	18,838	7.9%
County Total	717,000	722,900	730,500	741,000	757,600	772,860	789,400	72,400	100.0%	955,257	238,257	100.0%

Snohomish County Tomorrow 2017 Growth Monitoring Report

Comparison of Annual April 1st Population Estimates with 2035 Population Targets for SWUGA Cities and Unincorporated MUGAs
(all population estimates and targets below are based on December 13, 2012 city boundaries)

Area	Population Estimates (using Dec 13/2012 city boundaries)							2011-2017 Change		CPP 2035 Reconciled		
	2011	2012	2013	2014	2015	2016	2017	Amount	Pct of Total County Chng	Pop Targets (Dec 13/12 bdys)	2011-2035 Change	
											Amount	Pct of Total County Chng
SW County UGA Total	434,425	438,219	443,878	451,926	464,196	474,702	485,837	51,411	71.0%	582,035	147,610	62.0%
Incorporated SW County UGA Total	261,506	262,186	263,945	265,405	269,519	273,070	275,850	14,344	19.8%	363,413	101,907	42.8%
Unincorporated SW County UGA Total	172,919	176,033	179,933	186,521	194,677	201,632	209,987	37,067	51.2%	218,623	45,704	19.2%
Bothell Area	39,760	40,993	42,184	43,482	45,451	47,052	48,521	8,761	12.1%	53,117	13,357	5.6%
Bothell City (part)	16,570	16,720	17,020	17,020	17,230	17,390	17,510	940	1.3%	23,510	6,940	2.9%
Unincorporated MUGA	23,190	24,273	25,164	26,462	28,221	29,662	31,011	7,821	10.8%	29,607	6,418	2.7%
Brier Area	8,199	8,305	8,367	8,421	8,620	8,631	8,654	455	0.6%	9,327	1,128	0.5%
Brier City	6,201	6,256	6,315	6,345	6,500	6,501	6,506	305	0.4%	6,972	771	0.3%
Unincorporated MUGA	1,998	2,049	2,052	2,076	2,120	2,130	2,148	150	0.2%	2,354	356	0.1%
Edmonds Area	43,420	43,431	43,594	43,605	44,173	44,646	45,097	1,677	2.3%	49,574	6,155	2.6%
Edmonds City	39,800	39,800	39,950	39,950	40,490	40,900	41,260	1,460	2.0%	45,550	5,750	2.4%
Unincorporated MUGA	3,620	3,631	3,644	3,655	3,683	3,746	3,837	217	0.3%	4,024	405	0.2%
Everett Area	145,184	145,877	147,142	148,303	149,832	152,890	155,446	10,262	14.2%	211,968	66,784	28.0%
Everett City	103,100	103,300	104,200	104,900	105,794	108,294	109,794	6,694	9.2%	164,812	61,712	25.9%
Unincorporated MUGA	42,084	42,577	42,942	43,403	44,038	44,596	45,652	3,568	4.9%	47,156	5,072	2.1%
Lynnwood Area	63,327	63,599	64,351	66,121	68,335	69,962	71,470	8,143	11.2%	92,022	28,695	12.0%
Lynnwood City	35,860	35,900	35,960	36,030	36,420	36,590	36,950	1,090	1.5%	54,404	18,544	7.8%
Unincorporated MUGA	27,467	27,699	28,391	30,091	31,915	33,372	34,520	7,053	9.7%	37,617	10,150	4.3%
Mill Creek Area	54,747	55,635	57,020	59,106	62,404	65,045	68,444	13,697	18.9%	67,940	13,193	5.5%
Mill Creek City	18,370	18,450	18,600	18,780	19,760	19,900	19,960	1,590	2.2%	20,196	1,826	0.8%
Unincorporated MUGA	36,377	37,185	38,420	40,326	42,644	45,145	48,484	12,107	16.7%	47,744	11,367	4.8%
Mountlake Terrace Area	20,010	20,110	20,180	20,550	21,110	21,110	21,310	1,300	1.8%	24,797	4,787	2.0%
Mountlake Terrace City	19,990	20,090	20,160	20,530	21,090	21,090	21,290	1,300	1.8%	24,767	4,777	2.0%
Unincorporated MUGA	20	20	20	20	20	20	20	-	0.0%	30	10	0.0%
Mukilteo Area	32,545	32,670	32,877	33,468	34,770	35,454	35,995	3,450	4.8%	36,453	3,909	1.6%
Mukilteo City	20,310	20,360	20,440	20,540	20,900	21,070	21,240	930	1.3%	21,812	1,502	0.6%
Unincorporated MUGA	12,235	12,310	12,437	12,928	13,870	14,384	14,755	2,520	3.5%	14,641	2,407	1.0%
Woodway Area	1,305	1,310	1,300	1,310	1,335	1,335	1,340	35	0.0%	4,361	3,056	1.3%
Woodway Town	1,305	1,310	1,300	1,310	1,335	1,335	1,340	35	0.0%	1,389	84	0.0%
Unincorporated MUGA	-	-	-	-	-	-	-	-	0.0%	2,972	2,972	1.2%
Paine Field Area (Unincorporated)	-	-	-	-	-	-	-	-	0.0%	-	-	0.0%
Larch Way Overlap (Unincorporated)	3,370	3,410	3,716	3,952	4,056	4,256	4,658	1,288	1.8%	5,007	1,637	0.7%
Lake Stickney Gap (Unincorporated)	7,161	7,341	7,595	8,021	8,489	8,687	9,246	2,086	2.9%	9,786	2,625	1.1%
Silver Firs Gap (Unincorporated)	15,398	15,538	15,551	15,586	15,620	15,634	15,655	257	0.4%	17,683	2,285	1.0%
County Total	717,000	722,900	730,500	741,000	757,600	772,860	789,400	72,400	100.0%	955,257	238,257	100.0%

MUGA = Municipal Urban Growth Area.



March 19, 2018

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

Re: Scoping for Vision 2050

Dear Mr. Brown,

On behalf of the 650-member companies of the Master Builders Association of Pierce County (MBA), we are thankful for the opportunity to present these comments in regards to scoping for Vision 2050. We ask that these comments be considered as part of the project scope and approach for the update. Many of our comments echo the concerns of the Master Builders Association of King and Snohomish Counties.

How should the region's growth strategy be updated for Vision 2050?

1. Cities Need to be Responsible for Accepting and Reaching Growth Targets

- We notice that many jurisdictions push back on the rapid growth in the region through building moratoriums, wider buffers, higher impact fees, etc. which is contrary to PSRC's Vision that growth be focused in existing cities and towns, near job centers and transit, to lessen our impact on the environment (through greenhouse gas emissions, sprawl, preserving natural areas, etc.)
- We support the PSRC procedure of allocating growth to cities, towns, and unincorporated UGAs to accommodate the growing population, however, 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. Reevaluate UGAs

- We ask that the PSRC recognizes a possible consequences of cities and towns not accepting growth targets and/or increasing density is that growth is being pushed out, further from job and transportation centers.

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- We notice that people are moving where they can afford a home they can buy, even if it's far from where they work, which in part creates more pressure on our transportation system.
- Another option that we believe needs to be analyzed is developing policies that allow limited UGA expansions adjacent to established urban centers, while encouraging urban growth in established cities.
- We believe that a 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 limited or extended beyond the four-county region.
- We request that the SEPA review include a 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.

3. Revise the Growth Allocation Procedure

- We believe Vision 2040 growth targets did not adequately recognize where the population is growing and some cities were allocated growth targets that they knew they wouldn't meet. In other instances, cities were allocated growth targets that they knew they would surpass,
- We have found that 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
- We ask that PSRC removes 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.
- We believe that incentives would encourage urban growth and focus transportation dollars to the appropriate areas as jurisdictions would need to accommodate their growth targets to be eligible for transportation dollars. Jurisdictions would be inclined to focus on setting feasible 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.
- However, if PSRC chooses to retain the Regional Growth Strategy, we believe it should adopt the less prescriptive growth target process in the GMA and 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 erroneous goals

- 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. We believe 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.
- We recognize 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.
- We note that PSRC's comprehensive plan certification process, which occurs after GMA appeal periods have lapsed, 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 and understand that there are 23 boards and committees at PSRC (according to the PSRC website) with many types and ranges of focus. Thus, we feel this may be the appropriate time to assess PSRC's role in the region.

6. Regional differences

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◀ MASTER BUILDERS ▶

- We respectfully wish 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.
- We feel that 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.

In conclusion, we ask that you review the Multicounty Planning Policies (MPPs) under SEPA, with consideration of local governments' ability to implement the MPP policies; 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 which has resulted in development regulations that are outdated, inefficient, and not aligned with the Regional Growth Strategy. The MBA believes if a policy doesn't have an implementable action and is already required through other planning requirements, it should be eliminated.

We ask that you consider the MBA as a resource for the PSRC on anything concerning home building, affordable 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 update. We will continue to participate as the project moves forward.

Sincerely,



Jessie Gamble

Government Affairs Manager

Master Builders Association of Pierce County

3711 Center Street / Tacoma, Washington 98409

Direct (253) 278-8916

Office (253) 272-2112, Ext 103

www.mbapierce.com



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.

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,

A handwritten signature in blue ink that reads "Peter Steinbrueck". The signature is fluid and cursive, with the first name "Peter" and last name "Steinbrueck" clearly legible.

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:
 - 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.
 - 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.
 - 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.

By Email

March 19, 2018

Puget Sound Regional Council
Attn: Erika Harris, AICP, Senior Planner

(vision2050@psrc.org)

RE: Vision 2050 Scoping Notice

To whom it may concern:

On behalf of the Puget Sound School Coalition, we are writing to provide comments with respect to (i) the school siting policies that should be amended as part of the planned update of Vision 2040 (i.e., Vision 2050); and (ii) scoping of the environmental impact statement for Vision 2050.

During the 2017 Legislative Session, the Washington Legislature passed two bills (Engrossed Substitute House Bill 1017 and House Bill 2243, codified as RCW 36.70A.211-213 (“School Siting Bills”)). As an initial matter, RCW 36.70A.211(2) provides that the “*multicounty planning policy in which any county referenced in subsection (1) of this section is a participant [i.e., Vision 2040] must be amended, at its next regularly scheduled update, to include a policy that addresses the siting of schools in rural areas of all counties subject to the multicounty planning policy.*” Accordingly, Vision 2050 must include policies addressing the siting of schools in the rural area that are consistent with the School Siting Bills.¹

The School Siting Bills provide that schools serving students from the urban and the rural area can be sited in rural Pierce County. RCW 36.70A.211. Furthermore, the School Siting Bills provide that urban facilities and utilities (e.g., sewer) may be extended to schools serving urban and rural students in rural areas of all counties with the concurrence of the county and affected cities. RCW 36.70A.213.

¹ Currently, Vision 2040 policies relating to school siting include, among others: (i) “[locating] development in a manner that minimizes impacts to natural features;” (MPP-EN-5, page 35) (ii) “not [allowing] urban net densities in rural and resource areas;” (MPP-DP-22, page 55) (iii) “[siting] schools... that primarily serve urban populations within the urban growth area in locations where they will promote the local desired growth plans;” (MPP-PS-21, page 94) (iv) locat[ing] schools... serving rural residents in neighboring cities and towns and design these facilities in keeping with the size and scale of the local community;” (MPP-PS-22, page 94) and (v) “not locat[ing] regional capital facilities outside the urban growth area unless it is demonstrated that a non-urban site is the most appropriate location for such a facility.” (MPP-PS-24, page 95)

In light of the foregoing, the Puget Sound Regional Council should revisit the growth strategies set forth in Vision 2040.

We also support an environmental review process that analyzes the range of alternatives related to school siting. It should consider the projected population growth in the 5 to 18 age group and the need for additional public facilities, such as schools, to serve the students of the four-county region.

We look forward to reviewing the draft supplemental environmental impact statement regarding Vision 2050 and to continue working with you on this important issue. Additionally, please add Jake Kuper and Grace Yuan:

Jake Kuper
Chair, Puget Sound School Coalition
565 N.W. Holly Street
Issaquah, WA 98027
KuperJ@issaquah.wednet.edu

Grace T. Yuan
K&L Gates
925 4th Ave, Suite 2900
Seattle, WA 98104
Grace.Yuan@klgates.com

If you have any questions, please call. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Jacob Kuper". The signature is stylized with a large, looped initial "J" and a cursive "Kuper".

Jacob Kuper
Chair, Puget Sound School Coalition

Denise L. Stiffarm
denise.stiffarm@pacificalawgroup.com

March 19, 2018

Erika Harris, AICP, Senior Planner
Puget Sound Regional Council
ATTN: Vision 2050 Comment
1011 Western Ave, Suite 500
Seattle, WA 98104

Re: Vision 2050 SEPA Scoping Comments

Dear Ms. Harris:

The Puget Sound School Coalition¹ (the “Coalition”) submits the following comments regarding the Vision 2050 SEPA Scoping Process. The Coalition is an active participant in regional planning efforts as related to needed school capacity and school siting considerations. Vision 2050, as the updated Regional Growth Strategy, must include appropriate strategies for ensuring that adequate school infrastructure exists to support the addition of 1.8 million residents to the Central Puget Sound Region by 2050.

The Coalition agrees with the Puget Sound Regional Council’s (“PSRC”) identification of public services and utilities as one environmental area for discussion in the Supplemental Environmental Impact Statement (SEIS). As you know, the Growth Management Act (GMA) specifies a planning goal to “[e]nsure that public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards.” RCW 36.70A.020(12) (“GMA Goal 12”). The GMA definition of “public facilities” and “public services” include schools and education, respectively. RCW 36.70A.030(12) and (13). New development affects significantly a public school district’s capacity through enrollment increases resulting from the construction of new dwelling units and by further reducing land available for school capacity construction. Related impacts occur when students must travel further across a school district to reach available school capacity. The SEIS must analyze these impacts and identify appropriate and realistic mitigation measures.

¹ The Coalition includes the Issaquah, Lake Washington, Northshore, Riverview, Snoqualmie Valley, and Tahoma School Districts.

Environmental documents prepared for Vision 2020 and Vision 2040 (hereinafter collectively referred to as the “previous environmental documents”) erroneously cite to WAC 180-22-140 as the authority governing the organization of school district boundaries. However, that section of the WAC is specific to the boundaries for the nine state-wide *educational service districts* and not for the 295 individual school districts. Educational service districts are regional agencies providing cooperative and informational services to groups of school districts. RCW 28A.310.010. School districts are individual entities created under the authority of Article IX, Section 2 of the Washington State Constitution. (“The Legislature shall provide for a general and uniform system of public schools.”) See also RCW 28A.315.035. Chapter 28A.315 RCW governs the organization of school districts. Under that statute, school district boundaries may only be altered by a transfer of territory, the consolidation of one or more school districts, or the dissolution and annexation to a district of part of all of another district. RCW 28A.315.045. A proposed transfer of school district territory is subject to extensive process and an informed analysis of a multitude of factors including: student educational opportunities; safety and welfare; the history and relationship of the property affected to the student and communities affected; geographic accessibility; and effects on all funding sources including equalization of tax burdens and improvement in the economies of administration and operation of schools. RCW 28A.315.205.

The erroneous citation in the previous environmental documents, in part, leads to the misinformed and inadequate school mitigation measures of (1) a “careful examination of resources and whether [school resources] are being allocated in the best possible manner”; and (2) a “reassessment of current school district boundaries.” See, e.g., Vision 2040 Final Environmental Impact Statement at 5.7.4; Vision 2040, p. 94. The PSRC’s oversimplification of the school boundary process ignores the complexities of school district operations, financing, and educational equities that the statutory framework is designed to protect. Furthermore, the mitigation measures suggest school districts are responsible in isolation for ensuring that adequate schools exist to support growth. However, planning jurisdictions must work collaboratively with local school districts toward compliance with GMA Goal 12.

The SEIS should identify realistic and meaningful mitigation measures related to the impacts of the regional growth plan on public school facilities. Such measures should include, at a minimum, interjurisdictional cooperation on coordinating the permitting of new development with the delivery of required school capacity. This measure would avoid current scenarios where growth has been and continues to be permitted but school districts are unable to find adequate school sites or required public funding to build schools to serve the growth. Additional measures could include cooperative planning concepts such as: preserving adequate land at reasonable cost for schools; regularly reviewing and updating design and regulatory approaches to facilitate the siting of schools; prioritizing school district purchase of surplus public property; pursuing opportunities for shared use with schools of public properties; and increasing investment by jurisdictions in off-site public infrastructure needed to support the location of a school. Measures such as these would be consistent with the Vision 2050 Scoping Notice’s recognition

of the delivery of services in a cost-effective and efficient manner and in the spirit of a collaborative, long-term approach.

The Coalition appreciates the opportunity to provide these comments. Please add my name, on behalf of the Coalition, as an interested party for purposes of the Vision 2050 process.

Sincerely,

PACIFICA LAW GROUP LLP



Denise L. Stiffarm

cc: Members, Puget Sound School Coalition

*Seattle
Freight
Advisory
Board*

March 23, 2018

Hal Cooper Jr, Co-Chair

Johan Hellman, Co-Chair

Geri Poor

Frank Rose

Pat Cohn

Dan McKisson

Jeanne Acutanza

Mike Elliott

Kristal Fiser

Josh Brown, Executive Director

Puget Sound Regional Council

1011 Western Ave # 500,

Seattle, WA 98104

Sent electronically to jbrown@psrc.org

Re: PSRC Regional Transportation Plan for Transportation 2050

Dear Mr. Brown:

The City of Seattle Freight Advisory Board (SFAB) is very interested in PSRC's development of the next Regional Transportation Plan, Transportation 2050. The SFAB was founded by Seattle Council Resolution to advise the Mayor, the Council, and all departments on matters related to freight and the impact that actions by the city may have on the freight environment.

The SFAB appreciates the opportunity to participate in the Open House and scoping discussion for the plan on February 13th at Union Station. Previously, the SFAB provided a comment letter on the Regional Plan update on January 31, 2018. We request those same comments be accepted for the Transportation 2050 plan. Specifically, we want to reiterate the importance manufacturing and freight-related jobs have in providing family-wage jobs to the region. Preserving the transportation infrastructure including well-maintained, heavy haul freight routes and managing congestion by advancing ITS systems will be critical in ensuring manufacturing and industrial jobs remain for future generations.

Thank you for the opportunity to provide comments. Our board meets monthly and we welcome opportunities to participate in the development of a freight-supportive Transportation 2050 plan.

Sincerely,



Johan Hellman
Co-Chair, Seattle Freight Advisory Board



Hal B.H. Cooper Jr.,
Co-Chair, Seattle Freight Advisory Board

Attachment: SFAB Letter to Josh Brown on the PSRC Plan January 31, 2018

The Seattle Freight Advisory Board shall advise the City Council, the Mayor, and all departments and offices of the City in development of a functional and efficient freight system and on all matters related to freight and the impact that actions by the City may have upon the freight environment.

City Council Resolution 31243

*Seattle
Freight
Advisory
Board*

January 31, 2018

Hal Cooper Jr, Co-Chair

Johan Hellman, Co-Chair

Geri Poor

Frank Rose

Pat Cohn

Dan McKisson

Jeanne Acutanza

Mike Elliott

Kristal Fiser

Josh Brown, Executive Director
Puget Sound Regional Council
1011 Western Ave # 500,
Seattle, WA 98104
Sent electronically to jbrown@psrc.org

Re: PSRC Regional Plan Update

Dear Mr. Brown:

The Seattle Freight
Advisory Board shall
advise the City Council, the
Mayor, and all departments
and offices of the City in
development of a
functional and efficient
freight system and on all
matters related to freight
and the impact that actions
by the City may have upon
the freight environment.

City Council Resolution 31243

This letter reflects the comments of the City of Seattle Freight Advisory Board (SFAB) regarding the PSRC draft Regional Transportation Plan update dated December 2017. We appreciate the opportunity to provide comments on this regional plan that guides the transportation future of the region. The Freight Advisory Board was founded by Seattle Council Resolution to advise the Mayor and Council and all departments on matters related to freight and the impact that actions by the city may have on the freight environment. Our comments on the Regional Transportation Plan are as follows:

Economic Benefits – Freight needs to be recognized as central in support of local family wage jobs and integral to the overall economic health of the region. The Report provides a relevant discussion on the economic benefits of moving freight (see page 11, Exec Summary). Appendix “J” - The Regional Freight and Goods Movement, Figure 1, shows truck tonnage estimated to increase 56% between now to 2040. This would be good information to include in the body of the main document. However, if this information remains in the appendix, it would be helpful to include an acknowledgement and address the importance of accommodating growth in freight and also that most of this freight is currently moving on trucks. Notably 80 percent is local and regional distribution truck volumes and we need to preserve freight mobility on regional arterials. This demand for movement of goods will be further exacerbated by a shortage of trucks expected later this year.

Protection of Critical Trade Infrastructure – We support the plan’s recognition that “the Puget Sound region is a major North American gateway for trade with Pacific Rim countries and is a major economic engine for Washington state” and that a “transportation system that provides for the efficient movement of freight and goods is critical for the region’s economic prosperity.” To this end, we respectfully submit that the discussion of land use practices and planning tools should more fully support compatibility with existing trade infrastructure, such as freight rail corridors, rail-served industrial areas, and rail yards. Additionally, rail-served sites should be preserved, protected, and encouraged to upgrade infrastructure in land use plans to accommodate growing freight demands for the region. Additionally, rail-served sites should be preserved, protected, and encouraged in land use plans to accommodate growing freight demands for the region. This is especially important within designated and proposed MICs.

Freight Networks and Heavy Haul – As you know, the unique physical features that distinguish the Puget Sound Region also present serious impediments to the movement of people and goods. Freight is especially sensitive to this constricted system. Putting movement of freight at the forefront of planning along key corridors is crucial for continued growth in the region. Appendix “J” does a good job of cataloging freight important networks but does not show the integration and overlap or gaps of the STRAHNET/STRACNET, National Freight Strategic Plan and provides little mention of developing and supporting a Heavy Haul network. It would be useful to see these designation gaps and future planning for preserving this critical system across these system designations.

Performance of Freight Networks – The documents describe the importance of delays to freight and within the performance monitoring note the important performance measure of reducing truck delay. Other performance measures that are important to freight include maintenance of the freight network and establishment and progress towards a Heavy Haul system. Additionally, congestion in the regions primary network (freeways) impacts freight dramatically as Vehicle Miles Traveled and Vehicle Hours Traveled increase. As networks used by trucks are impacted by congestion for longer periods of time each day, the window of opportunity for trucks to operate is reduced. This can dramatically impact freight mobility and delivery operations. With this growing population there needs to be an emphasis on meeting the public’s need for getting everyday commodities to local distribution facilities. This distribution system continues to rely on large trucks that operate in congestion and gridlock. These delays and congestion eventually increase costs to the consumer.

Emerging technology – The Report describes and attempts to anticipate emerging technologies. You may wish to consider discussing and describing the dramatic shifts that on-line shopping has had and will continue to have on supply chain and delivery of goods. This shift has changed the needs for the last mile (loading zones) and even the last 50 feet of delivery of goods. Also new technologies like autonomous delivery, electrification of vehicles, and Intelligent Transportation Systems will reshape how freight operates on the overall transportation system. These trends are emerging but may change how we prioritize and measure transportation performance.

Safety – It is encouraging to see the growing and anticipated growth in bicycling. This growth in bicycling also means increasing demands for bicycle access to limited transportation systems. Where trucks are a priority, such as on the freight network in the City of Seattle, there should be conscientious attention to safety where the mixing of modes occurs. The number of bike fatalities suggests that this is an issue to consider in the future as we develop multi-modal systems. We appreciate the description and discussion of rail crossing and rail safety. We believe positive train control will help improve rail safety and it would be important to monitor and measure crossings and safety.

Funding – Movement of freight has dividends not only in the economic growth of the region but in providing family wage jobs. These benefits should be a consideration as funding is allocated throughout the region to expand, enhance, and support Manufacturing Industrial Centers.

Thank you for the opportunity to provide comments. Our board meets monthly and we look forward to staying engaged with PSRC in the scoping and development of the 2050 plan.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Johan Hellman', with a stylized flourish at the end.

Johan Hellman
Co-Chair, Seattle Freight Advisory Board

A handwritten signature in blue ink, appearing to read 'Hal B.H. Cooper Jr.', with a stylized flourish at the end.

Hal B.H. Cooper Jr.,
Co-Chair, Seattle Freight Advisory Board



TO: Puget Sound Regional Council

FROM: Seattle King County REALTORS®
12410 SE 32nd St., #100, Bellevue, WA 98005

DATE: March 19, 2018

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.

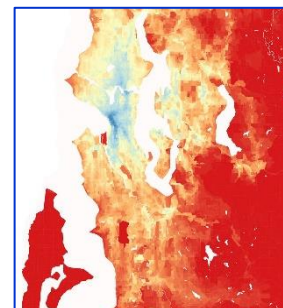
The PSRC should begin making regionally-based decisions that are measured against mobility and congestion relief for the region (as opposed to geographically constrained multi-modal project preferences). Failing to do so will prompt employers and workers to make re-location decisions away from the region 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.



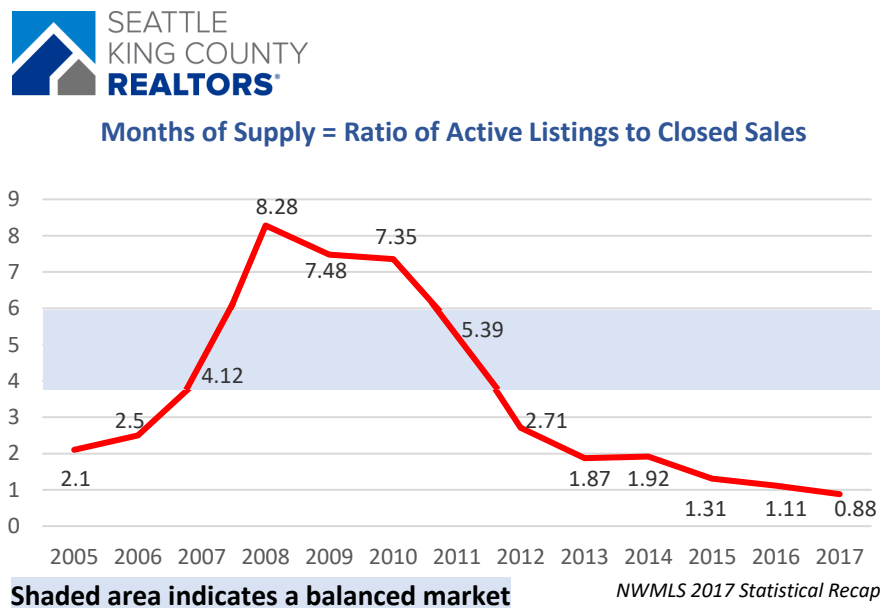
The data appear to indicate pretty clearly that this region is spending transportation dollars in a way that is moving the region towards becoming more congested than many other major urban areas in the nation, and leaving major portions of the region underserved in terms of access to functional and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



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:

1. 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?

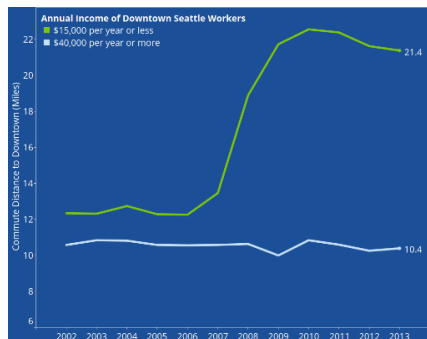
If the answer to either of those questions is “No” the PSRC should respond to the failure in that county by prioritizing both transportation project approvals and financial support for projects based upon:

- 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

DCrowell@NWRealtor.com

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

Direct Line: 425.974.1013 | Fax: 425.974.1032



180 Nickerson St., suite 202
Seattle, WA 98109
(206) 378-0114

19 March 2018

To: Puget Sound Regional Council (PSRC)
Re: VISION 2050 Scoping

The Sierra Club Washington State Chapter is pleased to submit a set of comments on the subject draft plan. As this scoping exercise is considered but the first step of a two-year development process, the Sierra Club intends to participate throughout culminating in 2020 with a final VISION 2050 Plan.

We see the PSRC, in its capacity as the state-designated Regional Planning Organization for the 4-county area, as key to enabling our region to work together to best prepare in a sustainable manner for the anticipated growth coming by 2050.

Please consider our comments given in **green** herein as the PSRC scopes out the needs for the development of the VISION 2050 Plan. Thank you.

Sincerely,
Tim Gould
Chair, Transportation and Land-Use Committee
Sierra Club Washington Chapter
<timg.sierraclub@gmail.com>

VISION 2050 Plan and SEPA Scoping Notice

Cover

PSRC is extending the region's growth plan to 2050.

VISION 2050 will build on the region's existing plan, VISION 2040, to keep the central Puget Sound region healthy and vibrant as it grows.

Our region also must strive towards *sustainability* to ensure a continued high quality of life as it grows. The growth in the coming decade must not degrade the resources available to successive generations to enjoy a healthy and vibrant region in successive decades.

As the region prepares to add more people and jobs in the coming decades — about 1.8 million more people by 2050 — VISION 2050 will identify the challenges we should tackle together as a region and renew the vision for the next 30 years.

page 1

VISION 2040 helps to coordinate the local growth and transportation plans developed by cities and counties to make sure they are consistent with the Growth Management Act and regional transportation plans.

The Puget Sound Regional Council (PSRC) is the planning agency for the central Puget Sound region, which includes King, Pierce, Snohomish and Kitsap counties. PSRC has specific responsibilities under federal and state law for transportation planning and funding, economic development, and growth management.

PSRC is updating VISION to consider new information and perspectives about a changing region. PSRC is seeking community input to shape the plan. What important regional issues should we focus on during the update?

A regional perspective must be used to ensure the multiple jurisdictions in the four-county area do not work at cross purposes. Major issues to address in the update to Vision 2050 include:

- **Reduction of greenhouse gas emissions in transportation and through land use patterns**
- **Housing availability, diversity of type, and affordability**
- **Balance of employment and housing among the major urban centers**
- **Social equity in public resource investments to improve upon historically underserved or neglected communities**
- **Access to regional amenities for populations dependent on public transportation**

How should the region's growth strategy be updated to plan for 2050?

Growth targets and job targets must be adhered to and periodically re-evaluated to directly address the region's ever-growing traffic congestion. We suggest an approach that uses multiple centers within the urban area to accommodate the growth where those various centers are well served by mass transit, and good networks of local travel that enable low-impact, active transport

As we consider different ways to grow as a region, what impacts and actions should be evaluated through environmental review?

To prevent urban sprawl, growth and jobs must be focused on the major urban areas which possess the infrastructure and the financial wherewithal to maintain said infrastructure. Air and water quality, health, and climate impacts of the physical layout of residences and job centers and the transportation systems used to connect them must be at the forefront of PSRC's environmental review. The timing of new employment centers, housing for those attracted to the region for those employment opportunities, and the transportation infrastructure on which the jobs and residents will depend must be carefully considered.

Over the next two years, PSRC will work with cities, counties, tribes, other agencies and interest groups, and the public to develop VISION 2050. PSRC will engage the public through surveys, workshops held throughout the region, formal comment periods, and input to PSRC's elected board members.

page 2

Planning as a REGION

Since 2010, the region has experienced significant growth with about 375,000 new neighbors calling the central Puget Sound home. Meanwhile, major infrastructure investments — like completing the 520 bridge and extending light rail from Everett to Tacoma to Redmond — are moving forward.

The region has had important successes implementing VISION 2040, which helps to fulfill the goals of the state Growth Management Act (GMA). The plan has helped coordinate state and regional initiatives and supported local decisions. Cities are thriving. Regionally, growth is shifting towards more compact, sustainable development occurring within urban areas and cities, with cost effective and efficient services, reduced impacts on the environment, and positive health outcomes.

Although the philosophy is correct, it is not always followed, especially when dealing with the urban external edges mostly fed by a poorly designed patchwork of road network spines which possess little extra right-of-way to support future HOV and transit. The jobs-housing balance is not well attained in the urban edge, nor

even in some of the urban centers that have historically lacked a large employment base or seen recent employment growth lag that of the region.

At the same time, the region continues to face significant challenges, including the climbing cost of housing. Congestion from rapid growth is reducing access to jobs, services, and housing. While recent economic growth has been strong, prosperity hasn't benefited everyone or all parts of the region. Finally, pressing environmental issues, such as climate change and preserving open space, require more collaborative, long-term action. VISION 2050 is an opportunity for cities and counties to work together to address the key challenges that extend beyond the boundaries of any single community.

The region needs to encourage new housing and services when the redevelopment of suburban malls occurs. Regional leadership needs to find ways to be *proactive* rather than *reactive* for helping solve housing availability and affordability challenges.

It is our hope that such a “*working together*” concept can be implemented and prevail, because now jurisdictions will often create solutions that work to their boundary but don't integrate well with adjacent entities. These balkanized approaches seldom produce outcomes that work for the region, instead becoming a detriment to everybody.

page 3

What is in VISION 2040 ?

VISION 2040 is the region's current plan for managing growth forecasted through the year 2040. The plan includes overarching goals, an environmental framework, a strategy to sustainably guide growth in the region, and multicounty planning policies. The plan also includes actions at the regional, county, and local level to make the plan a reality. VISION has six chapters addressing the environment, development patterns, housing, the economy, transportation, and public services.

The plan includes goals and policies to:

- Protect and restore the natural environment and reduce greenhouse gas emissions.
- Plan for growth in cities and urban centers, while reducing sprawl.
- Improve the balance of jobs and housing across the counties.
- Create more vibrant and resilient urban centers.
- Support health, well-being, and active living.

- Provide affordable housing choices to meet the needs of all residents.
- Improve mobility for people and goods.
- Maintain and operate the transportation system safely and efficiently.
- Encourage a strong, diverse economy.
- Provide services like solid waste, energy, and water systems to support the region's growth.

VISION 2040's Regional Growth Strategy defines a role for different types of places in accommodating the region's residential and employment growth. The strategy is organized around guiding most employment and housing growth to the region's largest cities and urban centers. Other cities and unincorporated urban areas are expected to play a more modest role as locations for new growth. Outside the urban area, rural communities, farms and forests will continue to be a permanent and vital part of the region.

We strongly support this “vision,” but it will take PSRC’s vigilant leadership and true cooperation among the region’s various large, medium, and small cities to accomplish, as some small cities, e.g., Black Diamond, seek to grow both far beyond their Growth Targets and far beyond the capability of in-place infrastructure. We emphasize the importance of agricultural resource lands both for urban agriculture and in the rural areas outside the urban growth area. Locally-sourced food crops will play an increasingly important role for both the health of the regional population and to reduce the climate footprint of providing such sustenance to the region.

Environmental review for VISION 2040 showed that, compared with a broad range of alternatives, the desired growth pattern would have significant benefits for mobility, air quality, environmental stewardship, and healthy communities.

page 4

VISION 2040 Regional Growth Strategy

Additional Regional Growth and Manufacturing Centers should be identified to: (A) lessen growth pressures on existing growth centers; (B) provide opportunities for higher density living; and (C) provide opportunities for shorter commute trips through a better jobs-housing balance. These regional Growth and Manufacturing Centers should be well-connected to the rest of the urban area by quality transit systems, and possess robust networks for internal transportation that allow residents to reach employment, services, and cultural destinations by low impact modes.

Where Growth is Happening

Growth still is happening in most cases far from employment and manufacturing centers. This, more than anything, has overly congested much of the region's transportation infrastructure. Improved jobs-housing balance is needed to reduce the stress on the transportation system and allow the region to be more effective in utilizing existing capacity.

SCOPING and Environmental Impact Statement Process

Determination of Significance and Request for Comments on Scope of Environmental Impact Statement

PSRC has proposed to update and revise the long-range growth, economic, and transportation strategy for King, Pierce, Snohomish and Kitsap counties. PSRC, as lead agency for environmental review, has determined that the proposal to update VISION 2040 is likely to have significant adverse impacts on the environment, and is therefore issuing a Determination of Significance (DS). This notice announces PSRC's intent to prepare a supplemental environmental impact statement (SEIS) on the proposed update to VISION 2040, pursuant to RCW 43.21C.030(2)(c). The SEIS will contain new information and analysis, and may also build on data and analysis contained in existing environmental documents, any of which may be adopted or incorporated by reference as appropriate, according to State Environmental Policy Act (SEPA) rules. The process will integrate SEPA and GMA to allow for consideration of environmental information as well as public input, and to assist decision makers in meeting the goals of GMA while identifying and mitigating probable significant adverse environmental impacts under SEPA.

We strongly support the preparation of an SEIS because of the recognized potential for major impacts on the environment.

Under the SEPA process (WAC 197-11-408), PSRC is completing a scoping period to inform the environmental review process for the VISION 2040 update. Pursuant to SEPA, PSRC is notifying the public of the intent to prepare an SEIS so that residents, jurisdictions, agencies, and tribes have an opportunity to comment on the scope of the impacts to be analyzed. Affected members of the public, jurisdictions, agencies, and tribes are invited, by this notice, to comment on alternatives, mitigation measures, probable significant adverse impacts, and licenses or other approvals that may be required. The method and opportunities for comment are provided on page 11.

Input on Environmental Review

PSRC is seeking input on environmental issues for analysis.

Natural and built environment. PSRC has identified the following environmental areas for potential discussion in the SEIS:

- Land use and population; employment; housing; transportation; air quality; ecosystems; water quality; public services and utilities; parks and recreation; environmental health; energy; visual quality and aesthetic resources.
- The scoping process may be used to expand or narrow the environmental areas that need updated analysis.

These are a good first set of environmental areas to be assessed as part of the development of the VISION 2050 Plan.

Additional issues that may be addressed. In addition to the areas listed above, PSRC contemplates that environmental analysis may address the following subjects, which may be modified in response to public comments and further analysis:

- 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.
- Some issues may be addressed by existing information in the VISION 2040 Environmental Impact Statement (EIS). Other issues may require new information or analysis.

Please see our comments on housing affordability elsewhere herein. Please see our comments on energy efficiency of the region's built environment.

Scoping Question: *What issues should be considered for environmental review?*

Traffic congestion increases greenhouse gas emissions and plays a large role in contributing to urban pollution, both air and water.

Input on Assumptions, Themes, and Issues

PSRC is seeking input on key assumptions to inform the plan update. This SEIS will build on the VISION 2040 EIS and include information analyzing the environmental impacts of updating VISION 2040.

- **Plan for 2050.** A new regional forecast will show expected employment and population through 2050. PSRC is planning for 1.8 million more people and 1.2 million jobs by 2050.
- **Implement the Growth Management Act.** VISION 2050 will continue to further the Growth Management Act's objectives of preventing sprawl; conserving farmlands, forests, and open spaces; supporting more compact, people-oriented communities; focusing a significant amount of new employment and housing into vibrant urban centers; and coordinating between local governments.
- **Use VISION 2040 as starting point.** PSRC will build on VISION 2040's current framework — goals, policies, and Regional Growth Strategy — as the starting point for developing VISION 2050.
- **Focus on emerging and important issues.** To efficiently use public resources and time, the plan update will focus on a limited set of issues that may benefit from additional regional discussion, coordination, and planning. Issues such as housing affordability, climate change, social equity, and shared economic prosperity have been discussed as key regional challenges.
- **Reflect the diversity of the region.** The plan update will seek to reflect the demographic, cultural, geographic, and economic diversity of the region.
- **Review trends and actions.** Key data trends will inform the update, as well as progress towards implementing the actions contained in VISION 2040. The update will identify actions and roles to realize the goals of VISION 2050 and outcome measures from which to measure progress.
- **Integrate recent initiatives.** The update will consider recent initiatives of PSRC and partners, such as recent local comprehensive plan updates, the Growing Transit Communities Strategy, Puget Sound Clean Air Agency climate change targets, the Puget Sound Partnership Action Agenda, and the Regional Centers Framework Update.
- **Acknowledge and leverage major regional investments.** Since VISION 2040 was adopted, voters have approved two Sound Transit ballot measures to expand high-capacity transit. Other regional transit agencies have expanded service, local governments have built key projects, and the state adopted Connecting Washington to fund major transportation projects. The update will address the impact of these investments on regional policies and strategies.

- **Update the document.** PSRC will review the existing plan for out-of-date information or statutory changes since the 2008 adoption of VISION 2040. PSRC will also look for opportunities to make VISION 2050 more accessible and usable.

Climate Change plans, Regional Centers framework, Growing Transit Communities Strategy, and similar efforts require a truly regional perspective to serve as a guide for jurisdictions to develop specific requirements, e.g., building codes. For example, VISION 2050 should add a set of goals and policies focusing on the role of a more energy-efficient built environment (e.g., energy efficient building codes more stringent than those of the State) which promises to be a critical element to combat climate change. The building heating/cooling and lighting sector is a major consumer of energy. Goals and policies which encourage more energy conservation for this sector should be considered as a key part of the 2050 Plan.

Scoping Questions:

What regional issues should the plan address?

We must ensure urban facilities are sited where the necessary infrastructure exists or can be improved to support such facilities. Governments throughout the region need to align their policies to produce synergies from the investment of public resources in major facilities. For example, a larger concentration of housing should be an expectation in areas adjacent to major mass transit investments.

What information should guide the update?

A wide variety of documentation exists on demographics, population and employment forecasts, sustainability indices, environmental degradation, etc. All and more should be part of development of the VISION 2050 Plan.

page 9

Planned Regional Transit System (2040)

Transit investments are planned throughout the region to provide more transportation options

People are greatly underserved in many areas where all too few options for transit are available. Where transit investments are implemented, the land use incentives and standards should be adjusted to direct more growth near the transit capacity.

page 10

Input on framework for considering modifications to growth strategy.

One purpose of this scoping process is to gain information so that PSRC can craft a limited range of alternatives for analysis within the Draft SEIS. The existing Regional Growth Strategy will be considered in the context of recent and projected trends, adopted plans, infrastructure investments, and broad goals for the region. The wide range of alternatives studied for the VISION 2040 EIS provides a robust starting point for this process. Within the range of alternatives previously studied, several options may be available to modify the existing Regional Growth Strategy to more effectively achieve the region's sustainability goals. The alternatives that will be developed will use the same assumptions and forecasts for growth through the year 2050.

- **No Action Alternative.** A “no action” alternative must be evaluated in accordance with SEPA. In this proposal, the no-action alternative will be defined as continuing forward with the adopted growth patterns in VISION 2040, to essentially “stay the course.” The existing Regional Growth Strategy would be extended to reflect forecasts for 2050 without amendment or revision to growth shares or regional geographies.

- **2050 Modified Regional Growth Strategy Alternative(s).** A modified 2050 growth strategy(ies) may be defined and evaluated with modified regional geographies, adjusted growth allocations among counties and regional geographies, and/or actions to promote the desired pattern of future population and jobs.

Any changes to the Regional Growth Strategy including growth and job targets must be carefully considered so none are simply rubber-stamped a “fait-a-compli.”

Scoping Question: *How should the region's growth strategy be updated to plan for 2050?*

An adaptive feedback approach should be employed in the growth strategy embedded in the Vision 2050 Plan. PSRC should identify, with input from key stakeholders, important metrics that can gauge the success of following the Vision growth strategy. As a region, we will need to learn from our experiences and adapt the growth strategy to allow for course corrections that can enable the region to more closely achieve the Vision 2050 Plan.

To: Puget Sound Regional Council
From: Snohomish Health District
Re: Vision 2050 Scoping Public Comment
Date: March 16, 2018

Thank you for the opportunity to provide public comment on the Vision 2050 scoping process. We appreciate the outreach PSRC has done and continues to do in order to receive comment from a variety of stakeholders in the region. As you move forward with Vision 2050 planning, we hope you will consider the following:

- **Vision 2050 should address displacement and strategies to address it equitably.** Displacement is a huge issue in all four counties. In Snohomish County, many low- and middle-income residents are being pushed out of the urban core and to the more rural north and east part of our county where housing is more affordable. This brings many challenges, including decreased access to transit and longer commute times. Specific measures on access to jobs, services, schools, and healthcare should be included, including how accessible these destinations are via transit, walking, or biking.
- **Incorporate the PSRC “triple bottom line” of People, Prosperity, Planet** consistently throughout Vision 2050. This will help to keep the focus on environmental and equity issues as well as development and transportation.
- **Continued focus on and inclusion of health throughout Vision2050.** Health is affected not only by the ability to easily and safely walk and bike, but also by issues such as climate change, access to transit, and stress (such as that related to displacement or long commute times). There are multiple avenues to addressing health in all policies. One example is Complete Streets. Specifically mentioning and incentivizing adoption and implementation of Complete Streets in Vision 2050 will help to move this process forward.
- **Include language indicating how existing disparities will be assessed and what steps will be taken to address this inequity.** Snohomish Health District appreciates language addressing health disparities and equity. There is often confusion around the term equity, as it applies to both geographic equity (distribution of resources among counties) and social equity (investing resources based on needs and attempting to balance distribution in recognition of historic discrimination against people of color and low-income residents). In practice, equity has often been implemented as geographic equity. We encourage PSRC to more clearly define equity and to include and emphasize both types.
- **Incentivize complete, walkable communities in our more rural and suburban areas.** Complete, walkable communities are crucial to health and well-being throughout the four-county region. Historically, PSRC has done an excellent job of encouraging such communities in our urban centers. Vision 2050 provides an opportunity to expand this to areas outside the urban core.
- **Quantifiable targets and performance measures must be included** in order for the plan to be effective. Implementation and accountability are crucial components of Vision 2050. How will its requirements be measured, enforced, and incentivized? Snohomish Health District encourages inclusion of a diverse group of stakeholders, including community members, in the process of developing these measures.
- **Continue to include specific planning and budgeting for inclusive engagement.** Snohomish Health District recognizes and appreciates the work PSRC is doing to obtain input from a diverse group of stakeholders across the four-county region. This community engagement is crucial to the long-term

success and health of our region. Especially important is the work of going to a community in addition to inviting them to come to PSRC-hosted events.

- **Include health throughout the Vision 2050 document and also keep a separate health section.** Including health as a lens of the work and as a titled section further reinforces the impacts and linkages for existing outcomes and for solutions.

We look forward to being part of the Vision 2050 process.

A handwritten signature in black ink, appearing to read 'JK' followed by a stylized flourish.

Jefferson Ketchel, MA RS
Administrator
Snohomish Health District
3020 Rucker Ave
Everett, WA 98201



March 16, 2018

Erika Harris
Senior Planner
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104

Re: VISION 2050 Plan and SEPA Scoping Notice

Dear Ms. Harris:

Thank you for the opportunity to comment on the VISION 2050 Plan and SEPA Scoping Notice. At Sound Transit, we are grateful for the role that VISION 2040 plays in coordinating land use and transportation planning in the region and look forward to contributing to the development of a new VISION 2050 plan. On behalf of Sound Transit, I'd like to make a few comments about the assumptions, themes, and issues that the Puget Sound Regional Council (PSRC) is seeking input on to inform VISION 2050:

- **Acknowledge and leverage major regional investments.** While Sound Transit is heartened to see that VISION 2050 will integrate significant transportation investments, there remains some uncertainty for how to characterize “major regional investments” in the period between 2040 and 2050. For this period, the high capacity transit corridor studies included in ST3 may be a suitable place to start. Nevertheless, Sound Transit asks that PSRC work proactively and collaboratively, especially with those likely to deliver these investments, when characterizing what they might be.
- **Integrate recent initiatives.** Sound Transit uses PSRC’s regional plans and population and employment forecasts as a basis for developing our own Long-Range and System Plans, particularly as it relates to the roles and expectations of regional growth and manufacturing/industrial centers. While the Regional Centers Framework Update is nearing conclusion, it would be helpful for the scope to clearly communicate how this effort will inform VISION 2050, influence changes to the Regional Growth Strategy, and describe next steps for centers designation procedures.
- **Focus on emerging and important issues.** Sound Transit agrees that housing affordability, climate change, social equity, and shared economic prosperity are key regional challenges deserving of attention and consideration in the VISION 2050 process. We also encourage you to consider the implications of emerging transportation technologies and their potential for significant impacts on land use patterns and regional mobility as another emerging and important issue

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Peter M. Rogoff

worthy of consideration in the VISION 2050 scope. At Sound Transit, we are also planning and preparing for these emerging transportation technologies and their potential impact on regional mobility. While autonomous, connected, electric, and shared vehicles are likely to influence mode of access to our system, we also believe that demand for high capacity transit services will remain high in the future.

Finally, and recognizing both that VISION 2050 will be more focused on how the region will manage growth between today and 2050 and that PSRC is in the final stretch of adopting the Regional Transportation Plan – 2018 (though with a horizon year of 2040), we encourage PSRC to clearly document regional transportation issues that arise and communicate how they are incorporated into VISION 2050 and/or are folded into the subsequent update of the Regional Transportation Plan.

Sound Transit looks forward to actively participating and contributing to the VISION 2050 process. Please let us know if you have any questions about our comments to the VISION 2050 Plan and SEPA Scoping Notice or if you would like to discuss further how PSRC and Sound Transit can collaborate on VISION 2050.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Shelden". The signature is fluid and cursive, with a long horizontal stroke at the end.

Matt Shelden, AICP
Director, Office of Planning & Innovation

cc: Don Billen, Acting Director, PEPD
Brooke Belman, Director, Office of Land Use Planning & Development
Trinity Parker, Manager, Regional Government & Community Relations
Alex Krieg, Sr. Manager, Planning & Integration

To: Puget Sound Regional Council
From: Transportation Choices Coalition, Puget Sound Sage, Futurewise, Forterra, Sierra Club, Cascade Bicycle Club, OneAmerica
Re: VISION 2050 Scoping
Date: March 19, 2018

Thank you for the opportunity to comment on the scope of the VISION 2050 update. As the major planning document for the Puget Sound region, VISION is instrumental in identifying regional goals, and the policies and processes our collective jurisdictions need to get there.

In its current format, VISION provides a good framework and the adopted policies in VISION set an ambitious and inspirational future. In addition to a stronger focus on social equity and climate change necessitated by our changing region, for this update we should focus on implementation, accountability, and performance measures -- we need better ways of understanding how these policies translate into practice: not only what do we strive for, but what do we aim for, how will we get there, and how are we doing?

As PSRC drafts the work plan to update VISION, we hope you will consider and include the following:

Lead with racial and social equity

When controlling for other factors, race is the biggest determinant in many quality of life issues, including life expectancy. While on average our region performs quite well on a number of factors, the aggregation hides many disparities across race and income. Therefore, it is important to continue to consider how all parts of the VISION process can help end these disparities.

- **Incorporate race and social equity lens and tools**
 - Define equity. Whenever we discuss equity we should clarify between “social equity” (which invokes needs-based investment) and “geographic equity” (which refers to equal distribution).
 - Develop and use racial equity analysis tools for PSRC policy development and engagement processes, and as a resource for member jurisdictions to use in plan development and outreach.¹
 - Identify and budget for opportunities to ensure ongoing structural consideration of equity, such as board and staff trainings.
 - Proactively work to end disparities. Identify baseline performance, identify impacts expected by adoption of a new policy or project, and adopt measures to not only mitigate anticipated impacts but proactively reduce existing disparities.
- **Further refine community engagement and decision-making**
 - Continue to resource community based organizations and community representatives to provide expertise and feedback - *ensure that the work plan budget includes these resources.*
 - Incorporate tribal feedback, participation, and needs early and upfront.
 - Expand community engagement to include historically underrepresented populations, incorporating alternative techniques such as community liaisons to maximize inclusion.
 - Move from translation to transcreation of documents and continue improvements in translation, using simplified language and visuals that is easy for non-professional planners to understand.
 - Ensure opportunities for structural improvements in engagement are captured on an ongoing basis.

Emphasize policies on health, equity, and the environment

¹ Per Race Forward (national racial equity experts), a racial equity tool: proactively seeks to eliminate racial inequities and advance equity; identifies clear goals, objectives and measurable outcomes; engages community in decision-making processes; identifies who will benefit or be burdened by a given decision, examines potential unintended consequences of a decision, and develops strategies to advance racial equity and mitigate unintended negative consequences; and develops mechanisms for successful implementation and evaluation of impact.

These policies are critical not only because they focus on the wellbeing of our people and our planet, but because they cross the typical siloes of planning. As we update VISION, we should be intentional in how we connect land use, transportation, and the economy, as well as their inextricable impacts on these intersection policies (a more focused subset of the People, Prosperity, and Planet lens that PSRC has adopted). How do we center these policies in the plan, and identify ways to use them as a screen in everything PSRC does (e.g. Centers, comprehensive plan certification)?

- **Consider social and racial equity through all policies.** How do different demographics (in particular race, income, and special needs) fare across transportation, health outcomes, access to open space, environmental outcomes (especially in unincorporated areas, where there is a lot of in-migration).
- **Displacement is an issue that crosses the environmental, health, economic, safety areas, and more.** Affordability crisis and suburbanization of poverty creates sprawl, VMT, and higher transportation costs to both the individual and jurisdictions. We need to understand and then adopt policies to address this underlying issue to get at others.
- **Carefully consider both environment and equity.** This plan update should simultaneously improve income disparities and environmental deficiencies by increasing affordable housing in sustainably designed Centers. In the meantime, it should also explore how to support directing growth and healthy infrastructure (including green infrastructure) in dense areas and providing services to those who can't afford to live in these places.
- **Reduce GHG emissions (and other pollutants) by addressing root land use causes.** There is a direct correlation between land use patterns, vehicle miles travelled, stormwater, and GHG emissions. Any GHG or stormwater reduction strategy should include strong regional targets and a focus on land use policies that reduce trips and impervious surfaces while increasing tree canopy and natural vegetation.
- **Regional open space.** VISION 2050 should support aggressive conservation and restoration of and equitable access to regional open space, consistent with the priorities outlined in the emerging Regional Open Space Conservation Plan. Additionally, VISION 2050 planning goals should support Puget Sound recovery goals identified in the Puget Sound Partnership Action Agenda.
- **Adopt important regional land use and transportation policies.** In conjunction with the PSRC's Regional Transportation Plan (currently being finalized) this should include consideration of multimodal level of service, target mode splits, Vision Zero, Complete Streets, and other policies that help meet safety goals and GHG reduction targets.
- **Incorporate critical parallel efforts.** How can we better incorporate Growing Transit Communities strategies, action items, and performance measures into VISION? How can we align with the work being done to explore the growth management framework in Washington State?
- **Focus growth within urban areas and cities.** VISION should maximize and focus regional growth within our existing Urban Growth (UGA) Areas and cities while limiting population projections and growth outside of the UGA and the rural area to the greatest extent possible. The focus population allocations needs to be within the current UGA and cities with sufficient infrastructure to support growth. PSRC should explore the ability of Small Cities to accept future growth, taking into account sufficient infrastructure as well as the jobs/housing balance to support growth with minimal impacts to transportation and other systems.
- **Growth and job targets.** These must be adhered to with special attention given to the region's cities on the urban "fringe" where exceeding such targets would greatly exacerbate traffic congestion along narrow corridors with inadequate infrastructure.

Focus on action items and implementation of VISION

The policies in VISION lay out regional goals that paint an idyllic picture of the Puget Sound Region. We do not need to wholesale revisit the policy framework in VISION. What needs to be strengthened and improved, is how the region is making progress collectively and locally to realize the goals of VISION. This update of VISION should focus on understanding what levers PSRC and its members have to help the region achieve the goals and policies. The VISION 2050 process should focus heavily on turning policies into outcomes.

- **Ensure alignment with member jurisdictions**

- Work with local jurisdictions to adopt plans and planning policies that reflect the goals and outcomes of VISION.
- Work with local jurisdictions on implementation plans to achieve VISION.
- Regularly assess local jurisdictions against performance measures and targets (see below), while providing assistance in achieving the goals of VISION.
- Assist in the collection of regional and local data to understand and daylight baseline conditions.
- **Project funding**
 - Further connect project funding to outcomes by directing goals and performance measures of VISION to be used explicitly in transportation project selection.
 - As performance metrics are developed, integrate these targets with existing investment frameworks (project selection, prioritization) in order to systematically and structurally invest in places with most need to reduce disparities.
- **Tool development**
 - Develop an equity tool that local jurisdictions can use on their policies, processes, and their outcomes.
 - PSRC should provide technical analysis to assist jurisdictions in meeting equity goals and measures of VISION. This could take many forms, including the creation of an Environmental Justice committee comprised of health and equity experts.
- **Incentives**
 - Outside of these processes, what other incentives can PSRC provide to jurisdictions that help meet regional goals?
- **Improve coordination across plans**
 - Look for improvements in how PSRC boards and staff coordinate across different plans and efforts, both in policies and timelines.
 - Explore how Growth Transit Communities policies and performance measures are incorporated in Vision to ensure consistency and alignment.
 - A regional perspective must be used to ensure multiple jurisdictions do not work at cross purposes.

Use specific targets and performance metrics to measure success and add accountability

In order to understand whether we are realizing our policies and our implementation tactics are working, we need to set goals and measure progress against them. Historically, we have focused almost exclusively on whether we have achieved growth targets in different jurisdictions and different land types. However, in order to truly understand whether VISION is realized, we must develop holistic performance metrics and robust quantifiable targets against which to measure progress, developed through community engagement and in conjunction with historically marginalized populations in particular.

- PSRC should use multicounty planning policies as an initial framework to develop performance measures, identifying baseline conditions, set targets, track progress, and hold jurisdictions accountable. (See comments on T2040 plan, below)
- PSRC should create an integrated performance measures framework with T2040.
- Ensure all outcomes and performance measures are disaggregated by race and income.
- Focus on **targets for equitable outcomes** in:
 - Health: Physical health (activity, air/water quality, and safety), and mental and social health
 - Access to mobility: access to services, jobs, affordable housing, open space, health care (including reproductive care), education (including primary and secondary schools)
 - Climate change, environmental justice, and other community-identified outcomes

Thank you again for the opportunity to provide feedback. We look forward to work with and supporting PSRC going forward on VISION.

Sincerely,



Hester Serebrin
Policy Director
Transportation Choices Coalition



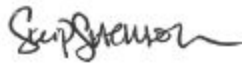
Debolina Banerjee
Climate Justice Policy Analyst
Puget Sound Sage



Bryce Yadon
State Policy Director
Futurewise



Rich Stolz
Executive Director
OneAmerica



Skip Swenson
Vice President, Policy and
Programming
Forterra



Blake Trask
Senior Policy Director
Cascade Bicycle Club



Tim Gould
Volunteer Chair Transportation &
Land Use Committee
Sierra Club

Relevant comments on T2040 (from Transportation Choices / Puget Sound Sage comment letter)

Appendix A: Multicounty Planning Policies	Multicounty Planning Policies	<p>The MPPs laid out in T2040 are comprehensive, progressive, and visionary. However, we feel that sometimes there is not a clear explanation of how they are implemented, and how individual jurisdictions and the region as a whole are held accountable to achieving them. We believe that being able to measure and communicate how we are enacting these policies and reaching these goals is paramount.</p> <p>We highly recommend including some introductory text in this section that lays out how these policies will be folded into work on VISION 2050 to establish more comprehensive performance measures, set minimum thresholds,</p>
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		<p>ensure robust implementation, and hold jurisdictions accountable for meeting these goals.</p> <p>Below are some examples of policies that are particularly important but may not be fully daylighted in performance measurement.</p>
	MPP-En-4 Ensure that all residents of the region, regardless of social or economic status, live in a healthy environment, with minimal exposure to pollution.	For discussion in VISION: how are we measuring this?
	MPP-DP-14 Preserve and enhance existing neighborhoods and create vibrant, sustainable compact urban communities that provide diverse choices in housing types, a high degree of connectivity in the street network to accommodate walking, bicycling and transit use, and sufficient public spaces.	For discussion in VISION: how are we measuring this?
	MPP-DP-44 Incorporate provisions addressing health and well-being into appropriate regional, countywide, and local planning and decision-making processes.	What is meant by “appropriate” here? For discussion in VISION: how are we measuring this?
	MPP-DP-45 Promote cooperation and coordination among transportation providers, local government, and developers to ensure that joint- and mixed-use developments are designed to promote and improve physical, mental, and social health and reduce the impacts of climate change on the natural and built environments.	How are we doing this?
	<p>MPP-DP-54 Develop concurrency programs and methods that fully consider growth targets, service needs, and level-of-service standards. Focus level-of-service standards for transportation on the movement of people and goods instead of only on the movement of vehicles.</p> <p>MPP-DP-55 Address nonmotorized, pedestrian, and other multimodal types of transportation options in concurrent programs – both in assessment and mitigation.</p> <p>MPP-DP-56 Tailor concurrency programs for centers and other sub- areas to encourage development that can be supported by transit</p>	How are we doing this? And how can we fold into VISION?

	MPP-Ec-9 Ensure that the region has a high quality education system that is accessible to all of the region's residents.	Is this something T2040 can measure in the transit chapter?
	MPP-T-3 Reduce the need for new capital improvements through investments in operations, pricing programs, demand management strategies, and system management activities that improve the efficiency of the current system.	How do we measure our investment in TDM? What threshold or target is good enough?
	MPP-T-24 Increase the proportion of trips made by transportation modes that are alternatives to driving alone.	Can we identify a target mode split and make investments to achieve it?
	MPP-T-25 Ensure mobility choices for people with special transportation needs, including persons with disabilities, the elderly, the young, and low-income populations.	Can we identify a target threshold to work towards, and work with these populations to identify what is sufficient to "ensure mobility choices"?
	MPP-T-22 Implement transportation programs and projects in ways that prevent or minimize negative impacts to low-income, minority, and special needs populations.	We recommend expanding this policy to go beyond "minimize harm." We should strive to identify existing disparities and proactively invest to bring greater benefits to these populations.

Chapter 4 - Summary what input from EJ populations	We strongly recommend laying out a work plan or a commitment to develop a work plan to address the issues raised here, either through VISION 2050 or through a separate process. What are the mechanisms and authority that PSRC has to help remedy issues around, say, lack of access to transit and safe walking projects? Low-income rates for user fees? Transportation cost burden?
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Appendix C: Public Involvement and Outreach	General	PSRC did great work trying new and innovative outreach methods during this plan. Can we add a lessons learned here that captures what worked and what didn't? For example, it would be great to record the importance of resourcing groups and communities to participate, but also note that engaging these folks very early on is critical in order to identify the best way to deal with capacity and other constraints. Other lessons learned discussed in our Community Partners meeting
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		<p>include: engaging earlier to provide more time for outreach, clarity on how the information will be used, and reliable translation and interpretation (e.g. Google Translate has not performed well).</p> <p>This can help provide a good roadmap for continuing to improve for the VISION update.</p>
Appendix E: Climate Change Analysis	<p>“Based on the work of PSRC’s Growing Transit Communities program, the baseline assumption for growth around transit stations in the region by 2040 is approximately 30%. If that new growth were focused even further – such that 50-75% of growth by 2040 is concentrated around transit stations – it is anticipated that emissions could be reduced an additional 2-4%. ”</p>	<p>Given our need to lower emissions, this seems like a good strategy. What are the next steps to commit to this additional reduction? Is it feedback during this T2040 process? A commitment to doing so in VISION? Further board discussion and votes?</p>
	<p>“Modest changes in the current plan assumptions, for example increasing the price per mile by \$.05, have the potential to generate an additional 5% in greenhouse gas emissions reductions.” and this? “Examples of additional steps that could be taken to further reduce emissions include the expansion of the pedestrian network, particularly to transit stops, and greater usage of alternative work schedules, lowering the burden on the system during peak commute hours. Based on national and regional data, these types of activities could provide an additional 1-2% reduction in emissions. ”</p>	<p>Given our need to lower emissions, this seems like a good strategy. What are the next steps to commit to this additional reduction? Is it feedback during this T2040 process? A commitment to doing so in VISION? Further board discussion and votes?</p>

Vision 2050 and EIS Scoping

Tacoma-Pierce County Health Department Staff Comments

Tacoma-Pierce County Health Department (the Health Department) offers Vision 2050 scoping input covering three areas:

- I. Scoping questions outlined in your scoping statement and notice dated Dec 18, 2017 and Feb 2018.
- II. Vision 2040 as a starting point for developing the Update.
- III. The two-page Summary on “Vision 2040 and Health”.

I: Responses to Your Scoping Questions

The Health Department’s Healthy Community Planning Interest Group met on Jan 25, 2018 to discuss your scoping questions using a health lens. Their responses are folded in below:

I-1. What are the key issues you’d like Vision 2050 to address?

- A clear vision for Vision 2050 to guide this work throughout the region.
- Health infused throughout, as also recommended by WA State APA’s Policy on Healthy Community Planning, which declares, among others, that health is a highly-valued human asset, without which individuals, families and communities experience reduced quality of life.
- A section on how Vision impacts complete health and well-being. The World Health Organization holistically defines health as “a state of complete physical, mental, and social well-being, and not merely the absence of disease.” Both the adopted APA National Policy Guide on Healthy Communities and WA State APA’s Policy on Healthy Community Planning stress the role of planning to address upstream social, economic and environmental conditions that determine health.
- Build on the current Vision 2040 triple bottom line framework of “people, prosperity and planet”. This framework fits well with the social, economic and environmental conditions that determine health. Use it to re-organize and consolidate sections to show connections between land use/transportation policies and people-prosperity-planet. (See Section II discussion and Appendix below.)

I-2. What “health” issues should be considered for environmental review in the SEIS?

- Besides environmental, consider social and economic impacts. Apply a triple bottom line lens to assess sustainability. Review both positive and negative impacts on individual and community health and well-being, including equity and fair access to housing, healthy food, education, transportation choices, economic and social opportunities. Recommend measures to promote positive impacts and mitigate negative impacts.
- Use the Guide to Integrating Health into SEPA Review to consider health in the SEPA checklist.

I-3. What “health-related” assumptions should guide the update?

- Longer commutes, limited affordable housing and living wage jobs continue to impact individual and community health and well-being.

- Climate change impacts human, environmental and economic health. We need to consider where and how we invest in transportation, energy, water and wastewater infrastructure to reduce flooding, sea level increases and other climate related risks. Vulnerable populations are more at risk from climate change impacts.
- Aging and special needs populations are growing. Their health will be jeopardized if we do not plan with and for these vulnerable populations.
- Health inequities exist and place matters. Our life expectancy depends on where we live and work, and choices we have and make.
- Prosperity is not shared equitably, both racially and geographically, across the entire region.
- Complete neighborhoods and mixed-use centers, not just complete streets, are key to promoting good health. It's important to ensure future centers and places are complete with a range of basic services and opportunities within walking distance.
- Driverless cars may not benefit health if not proactively plan for the potential benefits and address negative impacts in both planning and design.
- Everyone desires the freedom to choose and access opportunities for a better quality of life.
- Homelessness is on the rise. Housing is a determinant of health, particularly mental health.
- Improving health requires addressing poverty at its roots.
- People who live in socially-connected neighborhoods with a sense of belonging tend to live healthier and happier.
- Inclusive communities can help prevent gentrification.
- Unmanaged growth in unincorporated areas will reduce greenspace in the region, increase infrastructure costs, and affect human, environmental and economic health.

I-4. Which health issues facing the region would most benefit from enhanced regional planning as part of the update?

- Chronic diseases – prevented by healthy eating, active living, clean air and water, social and emotional well-being. Refer to WA State APA's Policy on Healthy Community Planning for details.
- Social, economic and environmental determinants of health – healthy housing, education and equitable economic development.
- Climate change—requires both adaptation and mitigation.
- Health equity—means “everyone has the opportunity to attain their highest level of health”. This can be addressed through a “health-in-all-policies approach,” and informed by a meaningful public engagement strategy when developing the regional plan.
- Health disparity—means “a particular type of health difference that is closely linked with social, economic, and/or environmental disadvantage”. Disparities exist among different counties, communities, socio-economic status, and race and ethnicities; and between urban and rural contexts. Besides opportunity mapping, local health departments and the Washington State Department of Health can provide you more information and data to help identify policies to reduce health disparities.

I-5. What “health-related performance measures” should be considered in evaluating the regional growth strategy and extending it to the year 2050?

- APA has a report on Metrics for Planning Healthy Communities. Many metrics are relevant for gauging the triple bottom line outcomes of the regional plan.

- There are many good data now being tracked by DOH's Washington Tracking Network, such as obesity and premature death. Any tracked data should be analyzed by geographies and socioeconomic status to address health disparities.
- Impact of investments on health outcomes across geographies and socioeconomic status to address social equity.
- Measure "people, planet and prosperity" by geographies and socioeconomic status. This will help determine which bottom line is under-performing, requiring new or enhanced policies to maximize social, economic and environmental benefits and regional/geographic equity, or target investments to neglected benefit area(s).
- Section II below discusses performance measures to support triple bottom line, which includes health.

I-6. How should the region's growth strategy be updated to plan for 2050?

- Apply a two-pronged approach to manage regional growth:
 - Continue to focus growth in UGAs and regionals and countywide centers: Highlight the unique role and function of different types of centers as healthy and complete places for people to live, work, learn and play. Incentivize transit-oriented development and complete neighborhoods to support healthy growth in the region.
 - Curb growth beyond UGAs by conserving open space as buffers, including critical areas, natural, rural and resource lands.

II: Making Vision 2040 as a Starting Point to Holistically Support Health

This section discusses both (A) the current plan assessment, and (B) a proposed Vision 2050 framework:

A: Current plan assessment

II-1 Assess Vision 2040 performance.

- Review findings of those tracked measures in P. 101-103 of Vision 2040.
- Identify factors affecting performance.
- Identify if policy or action amendments are needed to achieve Vision 2040 goals.
- Assess if the current measures are still relevant and meaningful. Are they sufficient to reflect progress made to improve people, prosperity and planet by 2040 and beyond?

B: Align Vision 2050 to support people, prosperity and planet outcomes

II-2 Develop a concise vision statement for Vision 2050.

- A well-defined vision can drive performance measures (measurable outcomes and objectives) and help prioritize policy actions.
- Based on the following figure depicting "healthy communities", i.e. in our case, a "healthy region", the Health Department proposes two bold overarching "vision statement" options as a starting point for Board conversations.

We see:

- Option 1: **A healthy and vibrant region with abundant opportunities for all to live, work, learn and play.**
- Option 2: **A vibrant region with healthy people, economies and environments.**

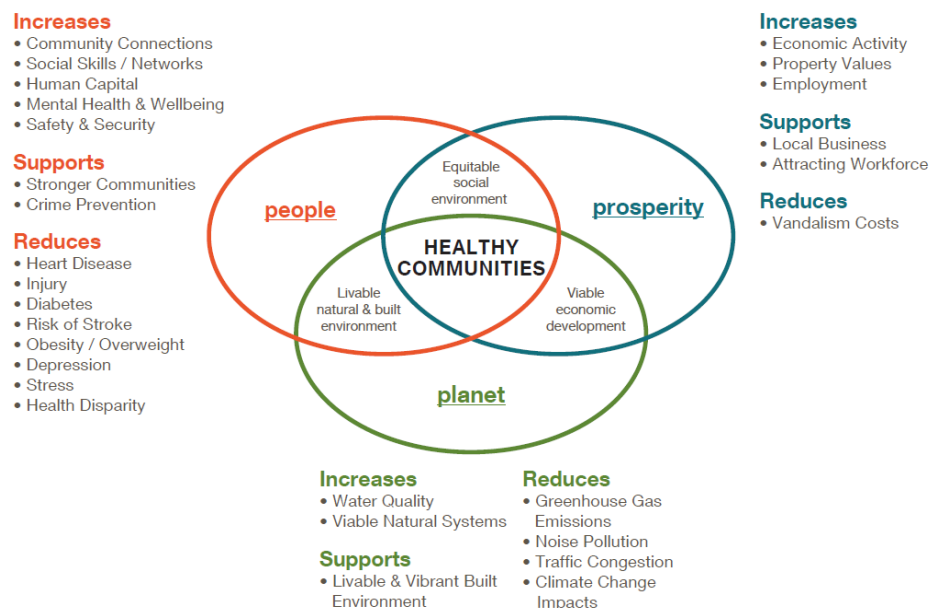
II-3 Identify one ultimate (let's say Tier 1) performance measure to track the vital sign of a healthy region as envisioned.

- The Health Department can assist with data and research evidence to support the development of different tiers of performance measures described below.

II-4 Organize Vision 2050 using the people-prosperity-planet framework.

- Define “people, prosperity and planet”. What each means, and what outcomes do we want to achieve under each?
- Identify two to three high-level (let's say Tier 2) performance measures for each.
- Align and re-package the plan with policies and actions to support each and its Tier 2 outcomes. Currently in Vision 2040, planning policies and actions are organized with minimal relationship to the triple bottom line. Consider re-organizing the Plan to ensure multicounty planning policies can advance a healthy region comprising healthy people, economies and environments. This triple bottom line framework can allow better coordination among different plans, such as connecting Regional Open Space Plan and Amazing Place, etc., to advance the Vision. (See Appendix on suggested ways of re-grouping planning elements to support people-prosperity-planet.)
- Use a “health-in-all-policies” lens to strengthen policies and actions to support each.
- Identify about four to five more specific (let's say Tier 3) performance measures to track performance of policies and actions targeting Tier 2 performance outcomes. This is particularly meaningful to inform mid-course action changes. Many of the measures now in the current plan can be used or tweaked as Tier 3 measures.
- By no means complete, here's a figure showing some possible outcomes of healthy people, economies and environments.

Causal Effect of Built Environment Interventions on Quality of Life



Source: Introductory Logic Model, p. 2, extracted from TPCHD Healthy Community Planning Toolbox (<https://www.tpchd.org/home/showdocument?id=590>)

II-5: Address “health” in Multicounty Planning Policies via a couple of ways:

- First, infuse health into all chapters and planning elements by using a “health-in-all-policies” approach. All planning policies and actions impact health outcomes. This approach is in line with both APA policy guides. The Health Department can provide research evidence linking each element to health and well-being.
- Second, develop a stand-alone element on “**Health and Equity**”, under the People chapter (see Appendix). Unlike any traditional chapter on health which primarily focuses on physical activity and healthy eating, this chapter provides policy guidance on how future land-use and transportation decisions consider health upstream. Topics include:
 - Define health and well-being, and health equity;
 - Describe determinants of health (i.e. social, economic and environmental factors affecting root causes of health) and their relationships with people, prosperity and planet;
 - Outline major health issues facing the region;
 - Introduce a “health-in-all-policies” approach in decision making;
 - Call for a Healthy Region Strategy as a functional plan to implement Vision 2050. This process will involve meaningful community engagement to fully understand local health issues, priorities and livability needs. Consider doing a Health Impact Assessment of the draft Vision 2050 to inform additional strategies for this functional plan; and
 - Provide data and tools, such as Planning for Whole Communities and Healthy Community Planning Toolkits, Health Lens Analysis, Equity Impact Review, Health and Equity Policy Analysis, and Health Impact Assessment, etc., to guide planning practice and SEPA decisions with a health/triple bottom line lens.

III: The Two-page Summary on “Vision 2040 and Health”

- III-1: If our proposal in Section II is accepted on how Vision 2050 addresses health, the new version should capture health-in-all-policies and recommendations proposed in the stand-alone chapter on health and equity.
- III-2: We support a vision statement for each summary and planning element/chapter. The statement should precisely envision how the subject element supports the overarching vision statement of Vision 2050 (such as Option 1 or 2 above). In response, the Health Department proposes the following vision statement for the Health and Equity element and its future summary sheet—**“Vision 2050 and Health & Equity” —“Healthy people, economies and environments are all vital to the health and wellbeing of our region.”**

Finally, the Health Department encourages PSRC staff and partners to use meaningful engagement methods when assessing community and regional well-being, and developing policies and performance measures to reach:

- Vulnerable populations, including youth, seniors, ethnic groups, transit-dependent and others with special needs; and
 - Those living in underserved, low-income areas, experiencing health disparities.
- Their health is often disproportionately affected by how we plan, and where we grow and invest in the region.

Appendix: Suggested Re-organization of Vision 2050 to Support People-Prosperity-Planet

Driven by either one of the two suggested visions to create **A healthy and vibrant region with abundant opportunities for all to live, work, learn and play**, or **A vibrant region with healthy people, economies and environments**, Vision 2050 can be organized better to target healthy region outcomes:

Chapter or Section	Expected Planning Outcomes (Examples)	Planning Elements: Policies and Actions (Examples)
People	Improved: <ul style="list-style-type: none"> Physical and social/emotional health Social connection Sense of place and belonging Inclusion and welcoming Diversity of land use mixes Access to daily amenities and services Safety and security 	<ul style="list-style-type: none"> Health, well-being and equity Complete (or equitable, ten-minute) neighborhoods: Mixed-use centers and places with amenities, basic services and opportunities to support healthy living and socially-connected places Placemaking context and design of mixed-use places to support community well-being and social gatherings Crime and safety
Prosperity	Improved: <ul style="list-style-type: none"> Local and regional economic growth Job creation Income Education Affordability and disposal income (or reduced “combined housing and transportation cost burden”) 	<ul style="list-style-type: none"> Economic development: Economy and jobs Housing: Affordable and diverse choices to support various lifestyles, life cycles and income levels Transportation: Alternatives to support regional growth, and safe and connected neighborhoods Concurrency to manage growth Public utilities and essential services
Planet	Improved: <ul style="list-style-type: none"> Air, water and land quality Open space developed and/or conserved Natural areas protected and/or restored 	<ul style="list-style-type: none"> Climate change adaptation and mitigation Limiting growth within UGAs Future of unincorporated UGAs Open space, natural areas, agriculture and other resource lands Rural lands Waste, stormwater, flood and other hazard management Emergency preparedness

March 19, 2018

Josh Brown, Executive Director
Puget Sound Regional Council
1011 Western Avenue Suite 500
Seattle, WA 98104

Mr. Brown –

Thank you for the opportunity to provide scoping comments for the Supplemental Environmental Impact Statement (SEIS) for the Puget Sound Regional Council (PSRC) Vision 2050 Plan. Growth projections from PSRC indicate another 1.8 million people by 2050. Now is the time to plan not only for their infrastructure needs but also for their environmental needs. While PSRC reflects 4 of the 13 counties bordering Puget Sound and the Salish Sea, these constitute 82% of the human population. PSRC will strongly influence the future of Puget Sound recovery.

The mission of the Washington Environmental Council (WEC) is to protect, sustain, and restore Washington's environment for all. Founded in 1967, we have a 50-year legacy and a vision for our shared future: thriving communities, with clean air, clean water, and clean energy for every Washingtonian, and building a 21st century economy that improves our health and environment. WEC was instrumental in passing the State Environmental Policy Act (SEPA) in 1971. We remain committed to defending SEPA and applying it to the pivotal challenges in our region through 2050 and beyond.

We agree that the infrastructure needs to support growth projections will have detrimental environmental impacts under a business-as-usual approach. Now is the time to ensure that both the environmental, public health, and infrastructure needs are met simultaneously. Fortunately, we have the technology today to address these needs.

The SEIS should address the direct, indirect, and cumulative impacts of environmental and infrastructure needs to serve our growing region. In particular, the SEIS should address the following issues:

Salmon and Orcas

Tribal treaty rights – How will Vision 2050 uphold tribal treaty rights regarding fish and shellfish?

Coho salmon runs – Prespawn mortality of coho salmon (*Oncorhynchus kisutch*) has been definitively linked to urban stormwater runoff (Scholz et al., 2011). Current scientific projections point to extinction in the coming decades because coho salmon habitat coincides with Puget Lowland transportation networks, yet we have technology that can mitigate the toxicity of urban runoff (McIntyre et al., 2015; Spromberg et al., 2016). How will infrastructure avoid extinction of coho salmon?

Chinook salmon runs – Chinook salmon (*Oncorhynchus tshawytscha*) are listed under the Endangered Species Act, with recovery plans in place. How will infrastructure avoid extinction of Chinook salmon?

Southern Resident Killer Whales – Southern resident orcas were listed as endangered in 2005, yet their current numbers have declined even further. Lack of salmon, toxics, and vessels including ferries have been implicated in their declining health. Orcas represent the culmination of many other measures of ecosystem health. How will Vision 2050 address prey availability, toxics, vessel traffic, and noise that harm orcas?

Climate and Energy

Greenhouse gas emissions – Conduct life cycle greenhouse gas emission evaluations and air pollution for all projects. How will Vision 2050 ensure that the counties' contributions meet both county and state greenhouse gas reduction targets?

Energy needs to support growth – The energy sector is undergoing profound transformations and more is expected. What are the assumptions behind addressing the energy needs of our region through 2050? How will Vision 2050 avoid a long-term reliance on fossil fuel infrastructure? Are new fossil fuel facilities required to serve the region's energy needs?

Health and safety issues around transportation of coal, oil and gas – Our region has a large number of pipelines, at-grade rail line crossings, and vessel traffic carrying coal, oil and gas. How will Vision 2050 address and avoid the increased health and safety risks of spills, leaks, air pollution, noise and other threats associated with the transportation of these fossil fuels?

Climate impacts on water resources – The increase in air temperature associated with climate change will alter the hydrology of alpine and forested lands as snow-dominated regimes transition to rain-dominated regimes. Science indicates that many river systems will experience higher fall and winter flows and lower summer baseflows. How will Vision 2050 account for adaptation needs and mitigate for unavoidable impacts?

Sea level rise – Several communities, including the four counties served by PSRC, recognize that sea level will rise. Public assets include gravity-based wastewater and stormwater infrastructure are designed based on current sea levels. However, rising seas and increased risk of flooding has already increased the risk of damage to these valuable public assets, as well as private assets. How will Vision 2050 address the need to adapt to sea level rise? How will Vision 2050 recognize the financial burden posed by poorly sited infrastructure in a world of rising seas?

Water Quantity and Quality

Instream flows and drinking water needs – Several basins have been closed to further water withdrawals, due to concerns over inadequate instream flows. The 2016 Hirst Supreme Court decision coupled with the 2018 legislative session investment in targeted water resource protection have increased attention on instream flows. How will Vision 2050 address water needs due to a growing population and climate change while simultaneously protecting instream flows?

Ocean acidification and dissolved oxygen – Nutrient releases from wastewater treatment plants decrease oxygen levels and pH in Puget Sound waters under current population levels and current treatment technology at wastewater plants that serve the four counties that constitute the PSRC (Bianucci et al, 2018). Local atmospheric emissions can worsen acidification (Pelletier et al., 2018). The population is expected to double by 2070, and without a change to wastewater technology implemented in the Puget Sound region, impacts on acidification and dissolved oxygen will worsen (Roberts et al., 2014). How will infrastructure reduce impacts to dissolved oxygen, pH, and related ocean acidification measures?

Forest and Agricultural Land Conversion and Downstream Impacts

Forest Conversion – Growth projections indicate a steady conversion of working forests and agricultural lands into residential and commercial lands (Alberti et al., 2007). Forested lands provide a variety of ecosystem services, include drinking water protection, flood protection, and salmon habitat. Agricultural lands provide local food security. How will Vision 2050 avoid losses to these values?

Floodplains – Floodplains provide a variety of valuable ecosystem services and also represent valuable land for development. However, poorly sited development puts private and public assets at risk and increases the risk to downstream communities. Floods are expected to worsen with climate change. How will Vision 2050 recognize the ecosystem values and avoidable costs of poorly sited development in floodplains?

Environmental Justice and Public Health

Disproportionate impacts – Toxic waste sites listed under the state Model Toxics Control Act are disproportionately located in communities of color and low-income communities, including the four counties served by PSRC (Front & Centered, 2017). Toxic sites represent one part of a larger pattern of disproportionate impacts that include lack of affordable housing, access to transportation, access to open space, and more assets. How will Vision 2050 eliminate the disparities and set a course toward an equitable future?

Transportation and public health nexus – Particulate and other air quality contaminants are higher in areas near and downwind of intense transportation corridors. Public health impacts, including asthma, have been linked to poor air quality. How will Vision 2050 ensure that the public's needs for transportation are adequately balanced by reducing public health impacts from transportation infrastructure?

Tree cover and public health – Numerous studies have demonstrated the human health and wellbeing benefits of tree cover in urban environments. Increasing development could reduce tree cover without a change in practices. How will growth projections protect and restore tree cover and the attendant public health benefits?

Puget Sound Action Agenda

Consistency – The regionally developed and federally approved Puget Sound Action Agenda represents the roadmap to Puget Sound recovery. Several Vital Sign indicators are showing improvements; however, some are trending down or not changing despite recovery efforts. How will Vision 2050, which must rely on a healthy Puget Sound, dovetail with Puget Sound recovery?

Quality of Life – Several measures of human wellbeing exist, including those identified by the Puget Sound Partnership in collaboration with hundreds of partners. How will Vision 2050 ensure that the cultural values associated with our region's quality of life improve?

In summary, we request that the Supplemental Environmental Impact Statement adequately address the need to protect and restore natural resource assets and the public and ecosystem benefits they provide. We cannot abandon the natural systems that define us as a region. We are fortunate that our region has been investing in solutions, and we know what we need to do. Achieving a successful Vision 2050 will require innovation and a significant investment to ensure that our natural resources are valued as assets.

Please contact us if you require further information, and we look forward to working with you on this vital planning process.

Sincerely,



Mindy Roberts, Puget Sound Director
Washington Environmental Council

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March 19, 2018

Josh Brown, Executive Director
Puget Sound Regional Council
1011 Western Avenue Suite 500
Seattle, WA 98104

Dear Mr. Brown,

Thank you for the opportunity to provide scoping comments for the Supplemental Environmental Impact Statement (SEIS) for the Puget Sound Regional Council (PSRC) Vision 2050 Plan. Growth projections from PSRC indicate another 5 million people in the four counties that constitute the PSRC by 2050. Now is the time to plan not only for their infrastructure needs, but also for their environmental needs.

Whale and Dolphin Conservation (WDC) is the leading global charity dedicated to the conservation and protection of whales, dolphins, and their habitats. Our mission is to amaze people with the wonder of whales and dolphins and inspire global action to protect them. Whales are fundamental parts of a healthy marine ecosystem, as indicator species and as ecosystem engineers. As a founding member of the Orca Salmon Alliance, WDC is dedicated to preventing the extinction of the critically endangered Southern Resident orca community, which lives in Puget Sound and off the West Coast of the U.S. and Canada. As fish-obligate orcas, the Southern Residents primarily depend on salmon as their main source of prey, and the decline of salmon throughout their range is the leading modern threat impeding the recovery of this unique, iconic population of orcas.

We agree that infrastructure needs to support growth projections in the Puget Sound region will have detrimental environmental impacts under a “business-as-usual” approach. Now is the time to ensure that the environmental, public health, and infrastructure needs are met simultaneously. Fortunately, we have the technology today to address these needs.

The SEIS should address the direct, indirect, and cumulative impacts of environmental and infrastructure needs to serve our growing region. In particular, the SEIS should address salmon and orca recovery.

Coho salmon runs – Pre-spawn mortality of coho salmon (*Oncorhynchus kisutch*) has been definitively linked to stormwater runoff from roads.¹ Current scientific projections point to extinction in the coming decades because coho salmon habitat coincides with Puget Lowland transportation networks. How will infrastructure avoid extinction of coho salmon?²

Chinook salmon runs – Chinook salmon (*Oncorhynchus tshawytscha*) are listed under the Endangered Species Act, with recovery plans in place. How will infrastructure avoid extinction of Chinook salmon?

Southern Resident orcas – Southern resident orcas (*Orcinus orca*) were listed as endangered in 2005, yet their current numbers have declined even further.³ Lack of salmon, toxic contamination, and physical and acoustic disturbance from vessels, including ferries, have been implicated in their declining health. As an indicator species, orcas represent a measure of ecosystem health. How will Vision 2050 ensure the survival and recovery of orcas?

¹ Scholz, N.L., M. S. Myers, S.G. McCarthy, J.S. Labenia, J.K. McIntyre, G.M. Ylitalo, L.D. Rhodes, C.A. Laetz, C.M. Stehr, B.L. French, B. McMillan, D. Wilson, L. Reed, and others. 2011. Recurrent die-offs of adult Coho salmon returning to spawn in Puget Sound lowland urban streams. PLoS ONE 6(12): E28013.
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² Spromberg, J.A., Scholz, N.L. 2011. Estimating the future decline of wild coho salmon populations due to early spawner die-offs in urbanizing watersheds of the Pacific Northwest. Integrated Environmental Management and Assessment 7(4):648-656.

³ The Southern Resident population numbered 88 individuals when they were listed under the Endangered Species Act in 2005. Today there are 76 orcas in the population (Data from Center for Whale Research annual census).



In summary, we request that the Supplemental Environmental Impact Statement adequately address the need to protect and restore natural resource assets and the public and ecosystem benefits they provide. Vision 2050 must include orcas and salmon.

Thank you for the opportunity to provide comments, and please contact us if you require further information.



Colleen Weiler
Rekos Fellow for Orca Conservation
Whale and Dolphin Conservation





**Washington State
Department of Transportation**

Transportation Building
310 Maple Park Avenue S.E.
P.O. Box 47300
Olympia, WA 98504-7300
360-705-7000
TTY: 1-800-833-6388
www.wsdot.wa.gov

March 15, 2018

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

Dear Mr. Brown:

The update to VISION 2040 provides a unique and crucial opportunity to set the course for central Puget Sound growth. While the foundation of VISION 2040 should stay intact, the region is in a period of rapid growth and profound change. Tremendous growth has brought with it severe congestion and housing affordability challenges.

WSDOT would like to continue the conversation of how to achieve a safe, equitable and sustainable transportation system in anticipation of the new 2050 planning horizon. The overarching point is that within the regional ecosystem, there are multiple interactive factors influencing each other. The VISION 2050 Plan is poised to revolutionize these interactions in an integrated manner that enhances equitable, livable and economically viable outcomes. To this end, WSDOT looks forward to being substantially involved in the development of a VISION 2050 Plan.

Following are issues that should be included in the VISION 2050 Update:

Transportation-efficient land use: The region has long embraced urban growth boundaries and a centers approach for accommodating growth. These places make it possible for more people to live near or more easily commute to their jobs, shopping and recreation and to reduce their need to drive to these destinations. Concentrating growth in centers also makes delivery of public services more efficient. To take advantage of these investments, the region should encourage more residential and commercial development near places that are well-served by transit and planned for additional high-capacity transit service.

Strategies for addressing jobs/housing/services imbalances: Our region's growth creates a tremendous opportunity to renovate existing development into complete communities where people can live, work, shop, go to school, get healthcare, and meet all their basic daily needs within a walkable/bike-able area.

Prioritize spatially efficient transportation: Walking, bicycling, and transit can move more people in the same amount of land than private automobiles can. The transportation system should support as many trips as possible being made by these spatially efficient modes with car travel accommodated where it doesn't compromise travel by more spatially efficient modes.

Cross-jurisdictional Consistency: The traveling public do not care who owns each component, they just want it to fit together into a cohesive whole where they can expect consistent rules. This applies to non-motorized, transit, vehicular, and park and ride facilities.

Affordable housing: The region is in the middle of a housing affordability crisis that is likely to continue, unless governments act. VISION 2050 should promote policies and implementation strategies that promote housing affordability, include the cost of transportation in the consideration of housing affordability, reduce the risk of housing displacement and encourage access to opportunities for all residents.

Access to shared nature and recreation. The region is full of "natural" areas that have been impacted by human settlement. People living in dense areas need the respite of access to nature within walking/biking distance, and urban nature needs actively tended. Investing in providing access to, and caring for, nature within urban areas will reduce the disturbance to truly wild areas and provide access to nature for people who do not have the means to travel out of the urbanized areas.

Monitoring Program: Use the update process to refine and adopt measures and benchmarks in support of VISION 2050 policy.

Level of service (LOS) versus Vehicle Miles of Travel (VMT): With regards to monitoring, WSDOT would like to partner with PSRC on ways to replace the LOS metric with VMT to determine transportation system performance. The problem with the LOS metric is that it intensifies regional congestion, is hard to calculate, and focuses on expensive capacity investments. The benefits of a VMT metric is that it supports transit and active transportation investments, is easier to model, less costly to implement, has health benefits (including GHG reduction) and addresses growing regional congestion more effectively.

Reduce Climate Change Emissions: The plan should identify implementation strategies local governments can adopt to mitigate the effects of climate change in the region. Concentrating growth and reducing reliance on private cars are examples of growth policies that can help reduce the amount of greenhouse gas emissions generated in the region.

Climate Resiliency: Include policies and strategies that help the region be more resilient to climate change impacts.

Mr. Josh Brown
March 15, 2018
Page 3

Climate Migration. The Pacific Northwest is expected to be a major receiving area. The region should be preparing now rather than waiting until people begin showing up in large numbers. Provide data on estimated impacts in terms of population increase, travel demand.

Cooperative Automated Transportation - This technology has great potential to dramatically influence traffic demand management for our roads and highways, extend the reach and productivity of public transportation, create new land uses for repurposed parking garages and gas stations, and reduce the carbon footprint attributed to the transportation industry. There are many unanswered questions on the cost, timing and implications of autonomous vehicles and the shared economy. Impacts of cooperative automated transportation could have either positive or negative impacts on regional transit that supports urban centers. The time is now to guide technologies to support regional objectives. Likewise, the evolution and future of Mobility as a Service (MaaS) must be understood and guided to support regional objectives.

Thank you for the opportunity to comment on the Regional Transportation Plan. If you have questions about these comments please contact Robin Mayhew at (206) 464-1264.

Sincerely,



Roger Millar, PE, AICP
Secretary of Transportation

RM:jd

cc: Patty Rubstello, WSDOT
Robin Mayhew, WSDOT