Appendix II.B: Comments and Response to Comments on the draft VISION 2040 and Supplemental Draft Environmental Impact Statement

This appendix contains all of the comment letters submitted on the draft VISION 2040 and Supplemental Draft Environmental Impact Statement (submitted during the July to September 2008 public comment period), and provides a response to each comment within each comment letter.

(Note: Letters were assigned a number in the chronological order in which they were received, and subsequently assigned a commenter type. For example, letter B-056 was the 56th letter received and was then subsequently assigned to the Business commenter type.)

1. Comment Letter, by Commenter Type

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GOVERNMENT		
City Government (14)		
City of Auburn	C-114	p.24
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City of University Place	C-129	p.69
County Government (6)		
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2. Comment Letters and Response to Comments

The following pages show the comment letters and the response to comments in the comment letters.

Comment Letter

B- 056

Robin McClelland

From: Chris Bandoli [cbandoli@barclaysnorth.com]
Posted At: Wednesday, August 15, 2007 2:29 PM
Conversation: Comments to Vision 2040
Posted To: Vision 2040
Subject: Comments to Vision 2040

On behalf of Barclays North, Inc., I am submitting the following comments to the Puget Sound Regional Council's draft version of its Vision 2040 plan. While there is some merit to aspects of the draft plan, the plan does not include the necessary requirements to make it a reality. For instance, while the plan aims to concentrate growth in existing urban areas even more forcefully than does the Growth Management Act (GMA), it does not require that cities, when annexing these areas of their Urban Growth Areas (UGAs), be required to maintain consistent zoning and population targets already designated for that land. The plan seems to encourage cities to do so, but history has shown that unless required to do so, cities are likely to alter land use plans for unincorporated areas in ways that almost always favor less intensive uses. This downzoning of annexed areas by cities has a profound negative impact on private property owners, whether they are development companies or private individuals, and also on the overall affordability of housing. B-056-001

Likewise, the draft plan calls for the use of more environmentally sensitive public utilities under city control, but does not call for said services to be extended by cities to all parts of UGAs so that the desired "urban area" development can take place. Once again, the plan seems to encourage this idea, but stops far short of requiring it. Large swaths of buildable land in UGAs sit undeveloped because cities refuse to provide sewer services and other infrastructure. Additionally, cities have at times used their power of utility extension to extract lesser densities (which brings the downzoning issue into play again), to delay development, and sometimes even to force developers to pay millions toward new system extensions and upgrades far beyond what is necessary to service the proposed project. Not only do these practices have then same negative impacts on property owners and housing affordability as downzoning, but it actually runs counter to the GMA and Vision 2040 goal of coordinated growth because it practically encourages the spread of development haphazardly into uncoordinated areas due to the incentive of existing services. B-056-002

Once again, we recognize that Vision 2040 aims for the admirable goal of responsible growth that is good for both the present and the future of the Puget Sound region. However, mandating such a lofty ideal without also providing realistic tools to achieve that ideal will lead only to more disjointed growth and ever higher housing costs. We hope that the PSRC will take this rational argument into account when crafting its final draft of the Vision 2040 plan for the state Legislature.

Sincerely,

CHRIS BANDOLI | BARCLAYS NORTH, INC.
GOVERNMENT AFFAIRS MANAGER
Corporate Phone 425.334.4040 | Fax 425.397.9162
Direct Line: 425.609.6907
www.barclaysnorth.com

8/21/2007

Response to Comment Letter

B-056-001 VISION 2040 contains policy MPP-DP-19 to address this issue.

B-056-002 VISION 2040 contains public service policies to address this and related issues. See, for example, MPP-PS-9.

B-123

GLOBAL TELEMATICS

September 7, 2007

Mr. Norman Abbott, State Environmental Policy Act Responsible Official
Puget Sound Regional Council
1011 Western Ave, Suite 500
Seattle WA 98104-1035

Dear Mr. Abbott:

In accordance with the Council's well-advertised invitation, I have reviewed the Vision 2040 Supplemental Draft Environmental Impact Statement. In this letter I am responding to the PSRC's question, what's your vision of a Preferred Growth Alternative for the central Puget Sound region?

My vision – shared by friends and colleagues – would be an alternative that provides better transportation performance than the results shown in Figure 2-8 on page II.29 for the Council's Preferred Growth Alternative, and for the Growth Targets Extended Alternative. These two alternatives continue on the path of failure of transportation planning and performance established by the existing Vision 2020 and Destination 2030. Reasons for the failure are reflected in my previous interventions on behalf of CETA in frequent testimony at Transportation Policy Board meetings, and in the USDOT certification process for PSRC's work, available in your files and documented on the World Wide Web at www.bettertransport.info/pitf/psrccertification.htm.

Aside from the on-the-ground deterioration of regional transportation performance on PSRC's watch over the past decade, the failure is evident in the comparison between modeled Base Year 2000 transportation performance (column 1 of Figure 2-8) and the depressed performance forecast for four decades later with either the Preferred Growth Alternative (column 2) or the Growth Targets Extended Alternative (column 3). In comparison with the year 2000 baseline, all measures either improve very marginally, or become worse in the 2040 forecast.

B-123-001

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www.globaltelematics.com

B-123-001 The Preferred Growth Alternative improves transportation on nearly every measure, including environmental measures compared to the extension of current local plans. Note that one key assumption guiding the update (as determined in the initial Public Scoping Report) is to use the same transportation system (as embodied in Destination 2030) as the basis for all of the VISION 2040 alternatives. Following the adoption of VISION 2040, these issues will be considered during the Destination 2030 update.

See my marked up copy of page II-29, attached, as an illustration of my point.

I have no hope of causing PSRC to change direction unless and until the absurdly expensive and under-performing Roads & Transit ballot proposition fails, as well as its successors along the same lines. However, in hopes of making changes in the forthcoming revision of the MTP, I do urge that the Final EIS for Vision 2040 provide very prominent exposure of modeled 2040 transportation performance of the Vision 2040 alternatives with the full implementation of Destination 2030, of which the Roads & Transit projects are a subset. This performance shows in Figure 2-8 attached. B-123-002

Specifically, the following additional disclosures of information in the Final Vision 2040 EIS and descriptive documents (including Powerpoints, handouts, and other presentation materials) would inform future MTP development:

1. Provide a much more prominent display of the referenced Figure 2-8, and also include an extensive text commentary explaining the results shown, which in all cases illustrate arguably unsatisfactory transportation performance measured against the criteria of PSRC Policy MPP-T-1, "Maintain and operate transportation systems to provide safe and efficient and reliable movement of people, goods and services." B-123-003

2. Provide two additional figures similar to Figure 2-9, "Transportation Performance of PGA and Growth Targets Extended Alternative," on page II-30. These two new figures should compare the PGA and the Growth Targets Extended Alternative against the year 2000 baseline, respectively. The public deserves to see the amount and direction of change between now and 2040. PSRC should provide extensive text description of why the amount and direction of change are expected and reasonable in the eyes of the Council, or whatever the staff is thinking about what the numbers show. B-123-004

3. Much more fine-grained displays of transportation performance information could be presented with the computer processing and mapping technology available to PSRC staff. The public and elected officials would be much empowered in decision-making participation by seeing transportation performance information of the type in Figure 2-8 provided for individual transportation corridors (such as I-5 and I-90) and for individual urban activity centers large (eg, Seattle) and small (eg, Puyallup). How is the mode split forecast to change around urban centers in the decades ahead? Information of this type should be displayed in large typeface and creatively designed exhibits explained with clear narrative. The mass of small-type transportation data tables in Appendix 3C of the EIS document is important to include, but should be supplemented with more communicative text and graphics providing explanation from the creative minds of PSRC staff. B-123-005

4. A particular, specific area of information is of critical importance in explaining the potential for improvement of transportation performance under the Preferred Growth B-123-006

(Comment continues on following page)

B-123-002 The VISION 2040 Final EIS has addressed this issues, with all of the key indicators shown in the Executive Summary in the Summary of Impacts table. Note that these issue will be considered during the Destination 2030 update.

B-123-003 The VISION 2040 Final EIS has addressed this issue, with all of the key indicators shown in the Executive Summary in the Summary of Impacts table. Note that these issues will be considered during the Destination 2030 update. Also, additional narrative has been added related to transportation performance results.

B-123-004 The Final EIS has been updated to address this issue.

B-123-005 The process to develop VISION 2040 covered a very large geography, looked very long-range, and was less detailed than local comprehensive plans. PSRC is in the process of updating Destination 2030 (the metropolitan transportation plan) to bring it into alignment with VISION 2040. These issues will be refined during the update of Destination 2030.

B-123-006 The process to develop VISION 2040 covered a very large geography, looked very long-range, and was less detailed than local comprehensive plans. PSRC is in the process of updating Destination 2030 (the metropolitan transportation plan) to bring it into alignment with VISION 2040. These issues will be refined during the update of Destination 2030.

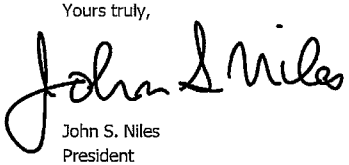
Alternative. To wit, transportation performance results should be displayed for the "forced" and somewhat unrealistic scenario of the fully built-out network of Sound Transit's light rail trains operating at minimum headways, with four-car trains loaded to crush capacity in peak periods. The public deserves to know the best transit and mode split performance that can be possibly achieved through high HCT utilization under Destination 2030 and Sound Transit's committed four-car light rail and approximate track alignment. (My own back-of-envelope estimate is that at most a point or two of regional transit market share could be added with a 125-mile network.)

5. In line with the boxed highlight comment on page 70 of the Vision 2040 main document about transit-supportive levels of density for residential units and employment locations, detailed maps would be useful showing present density levels and feasible 2040 density levels in urban centers in support of the Vision 2040 strategy and policies.

Implementation of these suggestions in the final Vision 2040 document would be a great service to our region. The quality of the regional conversation would be enhanced.

Thank you for all considerations over the past decade.

Yours truly,



John S. Niles
President
Global Telematics

Co-Chair
Coalition for Effective
Transportation Alternatives (CETA)

attachment

B-123-007 Continuation of B-123-006

B-123-007 Comment noted.

5.3 TRANSPORTATION

The Preferred Growth Alternative would share the types of transportation impacts described as common to all alternatives in the Draft Environmental Impact Statement. For the analysis of the Preferred Growth Alternative, the following two figures compare the Preferred Growth Alternative first to all the other alternatives, and then to the no action alternative (which is Growth Targets Extended Alternative in the year 2040). For additional detail, see *Appendix 3C - Transportation Demand Model Output Data.*

FIGURE 2-8: TRANSPORTATION PERFORMANCE OF ALTERNATIVES, REGIONAL

Performance Measure	Base Year (2000) Alternative	Preferred Growth Alternative	Growth Targets Extended Alternative	Metropolitan Cities Alternative	Larger Cities Alternative	Smaller Cities Alternative
Accessibility**						
Transit Access to Work	.70%	1.07%	.69%	1.52%	.70%	.48%
Transit Access to Non-work	.84%	1.18%	.77%	1.69%	.77%	.53%
Selected Mode Share - Work Trips						
% Single-occupancy vehicle	79.5%	74.9%	76.2%	73.6%	76.5%	79.3%
% Transit	8.4%	11.3%	11.6%	11.7%	10.5%	8.9%
% Walk/Bike	4.5%	6.3%	4.5%	7.2%	5.3%	4.1%
Selected Mode Share- Non-work Trips						
% Single-occupancy vehicle	46.2%	45.1%	45.5%	44.8%	45.7%	46.1%
% Transit	2.1%	2.9%	2.5%	3.1%	2.6%	2.1%
Average Trip Distance (miles)						
Work Trips	13.1	12.4	13.1	12.1	12.0	12.3
Non-work Trips	6.5	6.3	6.6	6.1	5.9	6.4
Average Trip Time (minutes)						
Work Trips	25.4	26.5	29.1	25.4	25.4	26.2
Non-work Trips	14.5	14.8	15.5	14.3	14.2	15.7
Vehicle Miles Traveled						
Total vehicle miles traveled	81,383,000	123,543,500	137,104,400	122,230,200	121,397,600	131,058,400
Freeway vehicle miles traveled	35,589,000	52,237,100	54,301,800	52,090,000	50,974,200	50,838,600
Arterial vehicle miles traveled	45,794,000	71,306,400	82,802,600	70,140,200	70,423,400	80,219,900
Vehicle Hours Traveled						
Total vehicle hours traveled	2,426,000	4,109,000	5,025,900	4,026,900	3,950,700	4,378,200
Freeway vehicle hours traveled	766,000	1,271,900	1,522,800	1,274,700	1,189,200	1,132,300
Arterial vehicle hours traveled	1,660,000	2,837,100	3,503,100	2,752,200	2,761,500	3,245,900
Delay (seconds/vehicle-mile)						
Total Delay	10.9	21.0	32.4	21.0	18.6	20.3
Freeway Delay	15.6	25.8	39.0	26.2	22.0	18.4
Arterial Delay	7.2	17.6	28.1	17.2	16.2	21.8
Delay (total hours)						
Total Delay	245,300	721,900	1,235,300	713,900	628,400	739,600
Freeway Delay	154,100	373,900	588,700	378,500	311,500	260,200
Arterial Delay	91,200	348,000	646,600	335,400	317,000	479,400

Note: For the geographical area listed in the figure title, the mode share and average time data refer to "trips attracted to" the geographical area; the vehicle miles traveled and delay data refer to "roadways within" the geographical area; and the accessibility data refers to "people living within" the geographical area. See *Appendix 3C – Transportation Demand Model Output Data.* ** Accessibilities represent the percentage (ex% of 100%) of the region's employment that is accessible by the average household within the allotted time frame and mode (i.e., a 10-minute walk, 20-minute bicycle ride, or 30-minute transit ride) within the region.

Note: This page of comments does not require a response.

Kemper Development Company

B-141

September 7, 2007 Sent via e-mail

To: Norman A. Abbott, PhD, AICP
Director of Growth Management Planning, SEPA Official
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA. 98104-1035

Reference: Puget Sound Regional Council – Draft Vision 2040
Supplemental Draft Environmental Statement (SDEIS)
July 2007

Our comments relate to the transportation element of the Supplemental Draft Environmental Impact Statement for Vision 2040.

Concerning the Supplemental Draft Environmental Impact Statement for Vision 2040 the transportation element is very disappointing with regard to the performance results and mix of modes upon which the public money is to be expended. Once again the draft transportation plan is a "plan to fail". The plan does not acknowledge the growth in population but continues an unjustified pursuit of behavioral changes by the public of which there is not a trace of response over the past 30 years in the Puget Sound Region or in the Nation.

B-141-001

Our Company has spent tens of thousands of dollars modeling and analyzing the Puget Sound Region traffic needs and the relationship of population growth to vehicle miles traveled. Our conclusions: 1.) Vehicle miles travel are almost perfectly correlated to population growth for all population densities at present and planned for the Puget Sound Region. Therefore, road capacity must be expanded commensurate with population growth. 2.) It is possible to relieve traffic congestion in the region if the financial resources are applied to a performance based plan using criteria of the lowest cost per new trip and the amount of delay reduction for both capital and operating costs.

B-141-002

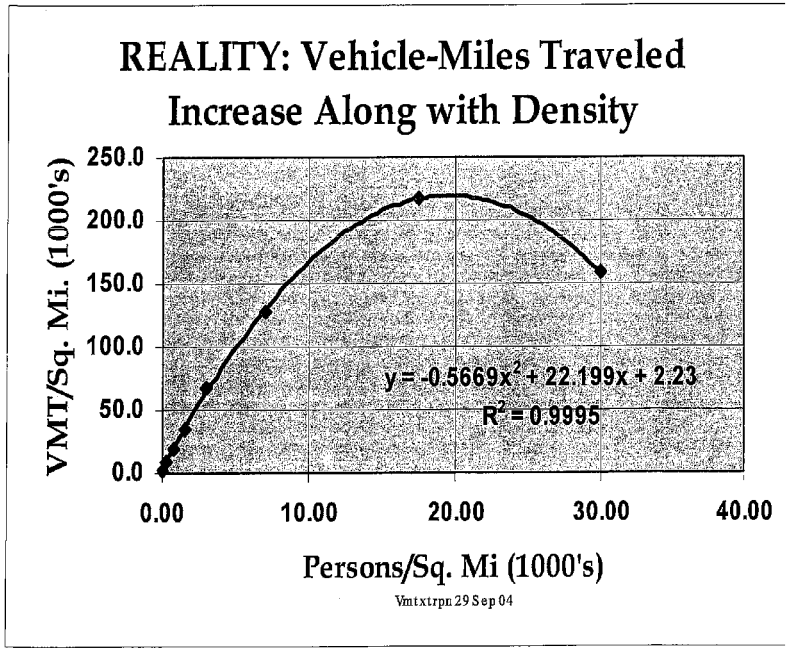
B-141-001 Comment noted.

B-141-002 Comment noted.

Kemper Development Company, Post Office Box 4186, Bellevue, WA 98009, (425) 646-3660

Our research from three separate Federal Highway Administration National Household Transportation Surveys shows there is a almost perfect correlation between vehicles miles traveled and population density up to population densities of 17,000 people per square mile. Population densities of most urban centers including Seattle – Everett Urban Area are far below10,000 people per square mile. Exhibit #1 below demonstrates this relationship of vehicle miles traveled to population density. This means, regardless of which land use alternative is chosen as a preferred alternative, when population density doubles so does vehicle miles traveled. Therefore, it appears that additional automobile travel must be planned for with population growth. This is what combining transportation and land use planning is all about. Simply providing more public transit does not stop the growth in vehicle miles traveled.

B-141-003

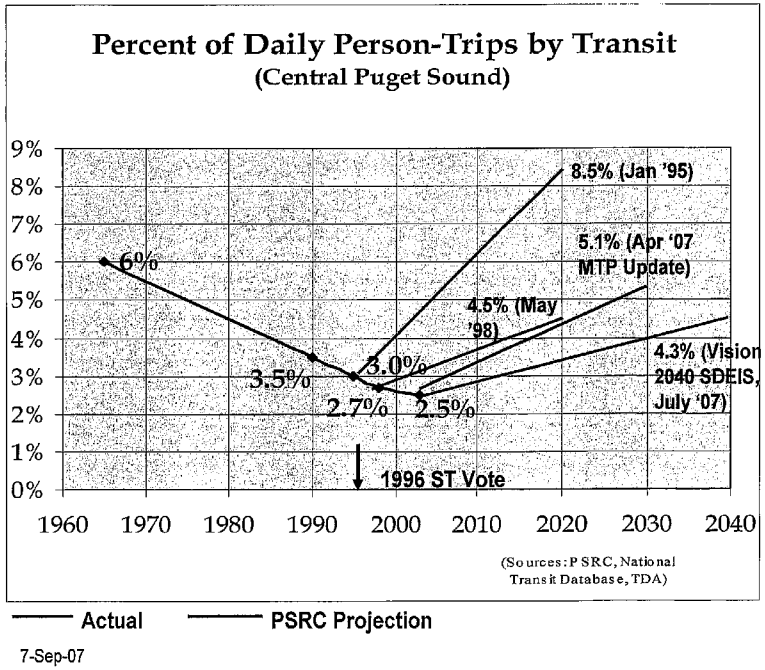


B-141-003 Comment noted.

Exhibit #2 below shows the forecast of the PSRC projected market share of transit trips for several forecasts. A continued decline in transit market share over a 40 year period has resulted in a present market share of 2.5% of total trips in the region.

PSRC continues to input light rail into the plan without significantly reducing the hours of delay in the region. The PSRC has refused to model an "all bus" system for the Region (no additional light rail) which would be much more cost effective, more flexible, quicker to implement, and produce more new riders than light rail. Further, added road capacity in the region is desperately needed for all vehicles including freight.

B-141-004



7-Sep-07

B-141-004 VISION 2040 and Destination 2030 promote a balanced transportation system and, therefore, have not modeled a transit-only, or any other single technology, alternative.

The failure over the years of the PSRC to implement Performance Based Planning and Least Cost Planning is cause for our Company to pursue aggressive action by the State Legislature in 2008 to adopt a one man one vote Regional Transportation Commission which will encompass the planning activity for the Puget Sound Four County Region and control the ballot measure funding requests of the agencies to be voted on by the public.

It is sad to observe that had Region adopted a "Regional **Transportation** Authority" in the early 1990's rather than a "Regional **Transit** Authority" committed to build light rail regardless of results or cost the Region would have been 15 years ahead of where we are today.

Hopefully after the struggle of the Puget Sound Region the past 15 years to implement meaningful transportation improvements and reduce traffic delay we will be able in the near future to organize and plan rationally for real results and avoid plans which are very expensive and do very little to help mobility of people, services and freight.

Traffic congestion is the problem and we can do something about it.

Respectfully submitted;

Bruce L Nurse

Bruce L. Nurse, Vice President – Transportation
Kemper Development Company
575 Bellevue Square
Bellevue, WA. 98004

B-141-005

B-141-005 Destination 2030 has addressed this issue, and conforms with the statutory requirements under state and federal statutes.

B-139

Memorandum

To: PSRC / Draft VISION 2040 Authors
From: Bill Angle / Public-Private Development Solutions
Date: September 7, 2007
Re: Comments re: Draft VISION 2040

With all due respect, I find the Draft VISION 2040 to be an embarrassment. It was a terribly frustrating read, just more of the "same old, same old." It is not bold. It is not clear. Its "specific" actions are so weak as to be meaningless.

In a variety of ways Draft VISION 2040 fails to address fundamental issues and/or mischaracterizes our current situation. It appears as much a political document as a planning document. Most critically, it fails to distinguish further planning with actual action. It speaks to further analysis and coordination – when it should be addressing incentives and disincentives.

Assertion: Energy use and population: deal with these two issues effectively and 70% of the PSRC's planning efforts are addressed.

B-139-001

B-139-001 Comment noted.

Energy:

Please undertake a the following thought experiment. It is 1990. Vision 2020 proposes and persuades the Washington State Legislature to implement the following law. Gasoline taxes will increase $.02 per month, every month, for the next 20 years -- $.24 per year. All gas tax revenues will be expended on transportation infrastructure and environmental mitigation using "best bang for the buck" criteria. How would that have impacted our land use? Our commutes and traffic congestion? The efficiency of our vehicles? Our population growth? Our housing? Political acceptance and revenue sources for a mass transit system? Environmental harm vs. environmental restoration? How would individuals have responded in their personal economic lives? What would the PSRC be concerned with today under such circumstances?

Our energy has been and remains exceptionally cheap, and so we use it profligately. It results in most of our long term planning and diminished quality of life issues. The solution is simple: *price energy properly so that its externalized costs are accounted and paid for.* The above thought experiment is just as valid today as if was 17 years ago. If citizens know that gas will increase $.24 per year, every year, and all that money goes to infrastructure and the environment, those citizens will make personal choices that are dramatically better for our region. It is so difficult to look at European models and see how they might improve our quality of life?

B-139-002

B-139-002 Comment noted.

Population:

The Draft VISION 2040 is driven by population and employment projections: PSRC forecasts that by 2040 the region will have 1.7 million more people and 1.2 million more jobs. *There is no discussion as to whether this is a desirable outcome over the next 33 years.* Moreover, there is no discussion as to whether our planning efforts and their implementation might significantly alter these growth figures. Is this assumption / projection set in stone? *How can the most important regional planning document in 20 years not address the most fundamental question facing the region? As a region, how quickly and how much do we want to grow?* This is a fundamental inquiry. Only then should we question how we want to direct that growth.

Please explain how failure to address this most fundamental of questions is bold, clear, or specific.

B-139-003

B-139-003 The Scoping process determined that the update would plan for the forecasted amount of growth.

The above are the most fundamental critiques. The rest of this memo will highlight other concerns and issues within the Draft VISION 2040 that might be remedied.

1. The VISION 2040 Vision Statement: The last sentence reads: "Land use, economic, and transportation decisions will be integrated in a manner that supports the environment, achieves social equity, and is attentive to the needs of future generations."

   The problem word is "integrated." It needs to be changed to "directed." Planners tend to believe that "integration" and "coordination" have something to do with action and consequences. They do not. "Integration" is not bold, clear or specific.

B-139-004

B-139-004 The existing language was retained.

2. King, Snohomish, Pierce, and Kitsap counties can no longer be "separated" from the remainder of the Puget Sound region for planning purposes. Considering the impact of Interstate 5, Whatcom, Skagit, and Thurston Counties must be folded into the long term planning process. This may not be within PSRC scope…but it should be. The fact that it is not is a planning failure.

B-139-005

B-139-005 Comment noted.

3. An Environmental Framework: The very first paragraph on page 5 is weak and inaccurate. "In recent decades, it has become clear that the health of the natural environment is closely linked to the region's economy and quality of life." The first sentence is nonsensical and meaningless. Further along, the paragraph becomes immodestly self-congratulatory: "Regional, countywide, and local *planning efforts* developed in response to the Washington State Growth Management Act *have placed the region on a solid path to restoring and protecting the environment. (emphasis added)*

   That's baloney. It's easy to argue that PSRC planning efforts (and Vision 2020) have had but minor impacts on restoring and/or protecting the environment. The fact that this

B-139-006

B-139-006 Comment noted.

B-139-007

B-139-007 Comment noted.

Draft VISION 2040 makes the claim does not make the claim true. *And since the PSRC has heretofore only minimally measured impacts, on what basis does it make the claim?*

B-139-008

4. Sustainability: Page 10, third paragraph: "There is a growing awareness of the need to live and grow in a *more* sustainable manner. *(emphasis added)* Sustainability is commonly defined as "meeting the needs of the present without compromising the ability of future generations to meet their own needs." Since this paragraph claims that we only need to live and grow in a *"more"* sustainable manner, then by implication are we not claiming permission to compromise the ability of future generations to meet *their* needs?

   Is this truly the position of the PSRC? If it is, then at what point in the future must we live in a truly sustainable manner, not just a more sustainable manner? Moreover, how sustainable or unsustainable? Who makes that decision? Isn't this a critically important moral issue? Is the PSRC truly empowered to take such a position? Is it even empowered to articulate such a position?

   Is this the environmental framework that Draft VISION 2040 proposes?

B-139-009

5. A Regional Strategy for Accommodating Growth: This is the strongest part of Draft VISION 2040. With that in mind, please note:

   - If Unincorporated Urban Growth Areas accommodate 21% of the region's population growth and 9% of the employment growth, that means approximately 5,000 single family dwellings per year for 33 years will be constructed in those areas, and that greater than 60% of the working portion of that population will thereafter commute into more urban areas; I suspect that if we compare with the gross figures over the last 20 years, we are projecting an enormous impact to the region vis a vis this sector alone; moreover, Whatcom, Skagit, and Thurston Counties cannot be ignored in terms of how we consider Unincorporated Urban Growth Areas;

B-139-010

B-139-011

   - If Metropolitan Cities and Core Cities increase population 540,000 and 363,000 respectively, most (maybe 70%?) of these people will be required to live in apartments, condominiums, and other dense forms of housing. Is this really likely? No matter what your projections indicate, does it pass the "smell" test? I think not.

B-139-012

   - VISION 2020 should characterize what these numbers on page 19 mean in human terms…the raw figures have little meaning to the man in the street;

B-139-013

B-139-008 This is based in part on PSRC and county monitoring reports, and findings from VISION 2040 issue papers (see psrc.org).

B-139-009 Comment noted.

B-139-010 The VISION assumes that unincorporated areas will be annexed or incorporated by 2040.

B-139-011 Concur.

B-139-012 The VISION 2040 process addressed this issue. The analyzed patterns of growth were compared to trends. A more compact development pattern is already being achieved in the region.

B-139-013 VISION 2040 has been revised to address this issue. See the expanded discussion of the numbers in the chart.

6. Policy Framework: Goals – Policies – Actions – Measures:

Here is where regulation is implemented. It is clearly a push down, command and control regulatory structure. It's a continuation of how we've been attempting to deal with our growth issues over the last 20 years. How has it been working?

If the PSRC answer is: "Very well, thank you." then perhaps the PSRC has been living in a different region than I've been living. An informal survey of various friends that have lived in the Puget Sound for at least 25 years asked whether their quality of life here is better or not. One and all make quite a bit more money (in real, inflation adjusted terms) than back in the 70's and 80's. Not one thought the quality of life in the Puget Sound has improved. We have more choices (restaurants, shopping, festivals, culture, jobs, etc.) but the crowding, traffic, and decline of our institutional and natural systems is dispiriting to all.

We cannot regulate ourselves out of this problem. We cannot plan ourselves out of the problem. And we certainly cannot "grow" ourselves out of this problem. Much of our planning and regulation (public policy) run counter to our individual economic choices. Our economic "success" is also our downfall. We make our economic choices on the basis of very cheap energy. Here again, consider that earlier thought experiment.

Planning can help, but the fundamental issue is how the millions of us in the Puget Sound region are going to each individually allocate our economic resources.

B-139-014

B-139-014 Comment noted.

Environment – Overreaching Goal – Page 27: Nice talk…completely at odds with how we actually spend our individual resources to improve the quality of our lives. This is especially a problem because "the environment" has no specific constituency that "votes" on its behalf.

B-139-015

B-139-015 Comment noted.

Page 28, middle first paragraph: "The region's approach to greater environmental stewardship is to improve coordination and increase the commitment to sustaining the environment through conservation of resources, protection of habitat, and restoration of natural system." *This approach has already proven a failure.* One definition of insanity is where you keep doing the same thing over and over again expecting different results. "Coordination and commitment" will not preserve or restore the natural environment. *Appropriate incentives and disincentives, economic and regulatory, will be required to preserve and restore the natural environment.* To think otherwise is to completely ignore how human beings behave in their own self interests. Later on Page 28 there is further blather about more analysis…and understanding interrelationships…and addressing issues in a holistic manner…yada, yada, yada.

With all due respect, we pretty much know what to do…that is not the issue…the issue is whether we are prepared to implement actions that will accomplish what we say we want to do. That does not take further planning. That takes action.

B-139-016

B-139-016 Concur. VISION 2040 has addressed this issue with action items for implementation at the regional, county, and local government levels.

Page 29, Goal: "The region will safeguard and natural environment by meeting the needs of the present without compromising the ability of future generations to meet their own needs." This is different than what was addressed above on page 10 of the Draft VISION 2040. There the discussion was about being "more" sustainable. Please make consistent in the final draft.

B-139-017

B-139-017 VISION 2040 has addressed this issue.

Page 34, Overview of Environment Actions and Measures: Every action is a bureaucratic action only: 1) reports and recommendations, 2) strategy, 3) action plan, 4) coordination, & 5) expanded assessment. These may be planning actions…but they have nothing to do with actual implementation.

B-139-018

B-139-018 Comment noted.

Housing, Regional Approach, Page 50: "VISION 2040 calls for increasing the supply of housing throughout the region by providing a variety of housing types and densities, for both rental and ownership…(s)pecial emphasis…on providing affordable housing…." Growth Management reduces the supply of land available for housing. As population increases, and especially when the regional economy is strong, housing demand is strong. As a result, prices increase. Our recent experience is that prices increase dramatically.

Reducing the supply of land available for housing is inconsistent with an ongoing supply of affordable housing. This issue should be addressed in VISION 2040 with an honest assessment of this dynamic.

How can VISION 2040 plan for this dynamic unless it describes the issue accurately?

B-139-019

B-139-019 Comment noted. VISION 2040 promotes increasing the supply of housing.

7. Transportation, Pages 63-71: This is the killer issue. This is the elephant in the living room nobody wants to admit. It manifests throughout all discussions in draft VISION 2040. It devours our resources and causes much of our environmental harm. Energy is so cheap, we drive and drive and drive, and drive some more. It is our great freedom and our great destructor.

B-139-020

B-139-020 VISION 2040 has been revised to address this issue. The Transportation section now has a subsection entitled "Sustainable Transportation" that includes policies that address transportation and the effects of emissions. Furthermore, there are additional references to efficiency and the need to increase the alternatives to driving alone.

The Economics:

Our region has a limited supply of transportation resources. They include the built infrastructure, our willingness to maintain that infrastructure, and our willingness to continue capital investment in that infrastructure. Our willingness to maintain and invest is politically constrained. Moreover, this region argues endlessly about whether to spend scarce resources on roads or transit.

Because of the pricing disconnect built into our transportation market, citizens and users of the system get no immediate pricing feedback. Every few years, voters are asked for a tax increase to fund roads, buses, and/or trains. From a man-in-the-street perspective, congestion increases, taxes increase, and the proffered results are unimpressive. They are so unimpressive, in fact, that we describe our current situation as a "crisis." Moreover, without pricing

B-139-021

B-139-021 The issue of funding for transportation (including the use of pricing and tolling) is addressed in what is now MPP-T-33. Funding will be a key consideration during the Destination 2030 update.

(Comment continues on following page)

mechanisms in place, we create transit systems with very substantial economic distortions (i.e., Sounder).

Since demand for roads is overwhelming supply, the solution must incorporate a method of reducing demand. A realistic solution incorporates market driven user fees resulting in pricing information, feeding that pricing information and actual dollars back into the System. Failure to implement such a strategy will result in a continued sense of powerlessness and crisis.

Fettering of demand must be accomplished by pricing strategies using dollars or dollar equivalents. This means user fees of various types. *Reducing demand should not be accomplished by using command and control techniques.* If we want political acceptance of a plan to restore the market, citizens must retain wide-ranging choices to make individual pricing and spending decisions on transportation. Choice is paramount in a free society, and markets work better with consumers having choices. More to the point, a command and control demand management system will not provide the system pricing information, exacerbating our current problems.

Finally, and critically important, user fees provide revenues to fund system requirements (roads, bridges, buses, jitneys, ferries, etc.). Resources obtained via user fees are the foundation of a market driven approach to our transportation System.

Practical Applications:

- Congestion pricing is already planned for the HOV lanes on State Highway 167. This program could be dramatically expanded throughout the region, with special emphasis on choke points.
- Tolls – new infrastructure projects large and small would be pay as you go. Projects that use tolling have tremendous public private partnership potential, with access to enormous capital markets.
- Higher Parking Taxes and Fees – a critically important element. City of Seattle's high-tech, easy-access, $1.50 per hour curb parking in downtown encourages driving. Their pricing is a great bargain compared to private sector parking lots and garages.
- Increase Gasoline Taxes – not just to increase revenues, but more importantly as a general demand management pricing policy. Consider the European model. Since we "know" that the real cost of petroleum is subject to dramatic future increases, those price increases will ultimately dampen demand. If we accomplish the same result by way of gasoline taxes, we gain the opportunity to transfer the value of those taxes into the System supply.
- Establish and Implement a Vehicle-Movement Fee: This is now working in Germany

(Comment continues on following page)

Continuation of B-139-021

B-139-022

B-139-022 The Destination 2030 update will provide an additional opportunity to address this issue.

for trucks. It is now technologically feasible via wireless radio technology and the Global Positioning System to put a small device into all vehicles that records the time and location of every foot that a car is driven. Charging a road use fee by time-of-day and location will take years of work to implement, but the time to begin is now. Time and location based fees can completely replace fuel taxes, which are going to become less viable over time as vehicle fuel types diversify.

The Puget Sound Regional Council's Traffic Choice study put such boxes in hundreds of cars in the nation's leading test to date of the concept. Let's take advantage of the know-how gained locally and take the next steps.

Preservation of consumer privacy is a key, to be maintained by system designs that do not routinely transmit vehicle locations to government authorities. Detailed locational records can be maintained within the measuring device under a consumer's physical control, and only summary user charge information provided to authorities for billing purposes.

Continuation of B-139-022

The Environment

Let's use the Puget Sound (body of water) as our example. Our Puget Sound is a classic environmental commons – a resource held in common by us. We all have access. Users derive increasing benefit with increasing use, and so we maximize our use especially when it's free of cost. We use it for recreation. We use it for its resources. *And, most important in regard to its environmental health, we use it as a dump.* We have created laws and regulations that are suppose to protect if from the most egregious dumping. They work pretty well. And citizens are much better educated there is far less truly toxic material (like heavy metals / PCBs / etc.) introduced compared to 50 years ago.

Yet back then, the Puget Sound was still fairly healthy, while today, it's sick and getting sicker. Why?

It takes no further study to demonstrate that non-point source pollution from a population of 3.5 million people is the fundamental problem facing the Puget Sound today. Our economic world dumps so much junk into our Puget Sound, it really doesn't stand a chance. And by PSCR's projections, we will add 1.7 million people and 1.2 million jobs in the four county region in the next 33 years.

Consider just one element: daily vehicle use of 2,000,000 vehicles with 4 tires per vehicle wearing out every four years and then flushed into the Puget Sound via storm drains equals the equivalent of 2,000,000 tires per year, finely ground, flushed into the bottom of the Sound. Add oil; add transmission fluid, add radiator fluid, add fertilizer, add this, add that. So we can go study everything we want, but the clear problem is the lot of us.

Here's the fundamental question: How do we create an economic model of incentives and

B-139-023

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(Comment continues on following page)

B-139-023 VISION 2040 has been revised to address this issue. See the expanded narration on transportation and the environment as well as the subsection of policies titled "Sustainable Transportation." Also see the Environmental Framework and the Environment policy section.

disincentives that will cause us to quit using the Puget Sound as a dump? Finding an answer to this question is critical. *Planning that results in command and control approaches can work for egregious dumping. But it cannot provide the daily, fundamental economic signals that cause each of us to husband our resources, use our energy wisely, and pay for environmental and sustainable mitigation efforts.*

Only an economic solution will work for non-point source pollution. Why? Two reasons. The first is that only an economic solution will generate sufficient resources for the problem at hand. The second relates to economic theory. Non-point source pollution is an externalized cost of our economic activity, especially of our transportation system activity. (So is congestion!) Externalized costs are real costs, but they do not show up in the pricing information for the market system as a whole. Here those costs show up as pollution that is destroying our Puget Sound. So by way of example, if the actual, full cost of our transportation system included keeping our Puget Sound immaculately clean, we would increase our gasoline taxes further and not just give those taxes to WSDOT, but would also use them for comprehensive road drainage filtering, etc., etc.

Ultimately, this will require a broad range of user fees. Those user fees must then be channeled into the private sector to implement traps and filters that truly protect the Sound from introduction of most pollutants. User fees require political will, but can accomplish two things simultaneously. First, user fees can generate very substantial revenues (which will be necessary for a restoration project this ambitious). Second, those fees may inhibit the kinds of activities that ultimately cause the greatest amounts of pollution.

Continuation of B-139-023

Conclusion:

Population and energy use. It bears repeating. Deal with these two issues effectively and 70% of the PSRC's planning efforts are addressed.

Be Bold. Be Clear. Be specific.

Draft VISION 2040 should follow its own advice.

C-114

CITY OF AUBURN WASHINGTON

Peter B. Lewis, Mayor

25 West Main Street * Auburn WA 98001-4998 * www.auburnwa.gov * 253-931-3000

September 5, 2007

Puget Sound Regional Council
ATTN: Growth Management Policy Board
1011 Western Ave, Suite 500
Seattle WA 98104-1035

Subject: Comments of Vision 2040

Dear Chairman Lonergan:

The City of Auburn appreciates the opportunity to review and comment on the Draft Vision 2040. We recognize that a tremendous amount of thought has gone into the draft and there are many elements of the draft that we concur with and strongly support. Auburn would like to commend your efforts, as well as the overall the quality of this draft. Since this document sets the vision for future updates of Destination 2030 the City has several important concerns to share with you now. C-114-001

Our comments focus on two main goal and policy areas:

1. Maintaining and supporting manufacturing/industrial centers (p. 43)
2. Maintaining and improving existing transportation systems (p. 67)

Maintaining and supporting manufacturing/industrial centers
Within the Draft Vision 2040 document the map on page #42 isn't consistent with reality. Indeed all of the nine valley cities of Fife, Puyallup, Sumner, Algona, Pacific, Auburn, Kent Renton and Tukwila are fulfilling the same function as Kent currently does as a Manufacturing/Industrial Center (MIC), and together the Valley cities comprise the 4th largest warehousing and distribution center in the country. We would like to see PSRC and region update its MIC designation and go to the next stage, to further develop policy MPP-DP-13, and start the process to designate the entire valley as a MIC. This distribution center is largest one within the state and its viability is key and essential to the region's economic development. Thus we feel it should be fully recognized in Vision 2040. C-114-002

Maintaining and improving existing transportation systems
In addition we would like to bring to your attention a serious concern about our regional arterial system and its viability to serve our regional economic development as portrayed in Vision 2040. Our concern is that many cities within the region that are located within freight corridors similar to Auburn's situation will not be able to participate in achieving the goals of Vision 2040 due to the failing condition of a significant portion of our local arterials. A good portion of our local arterials were simply never constructed to a C-114-003

(Comment continues on following pages)

AUBURN * MORE THAN YOU IMAGINED

C-114-001 Thank you.

C-114-002 An action has been included that calls for an assessment of centers.

C-114-003 The issue of funding for transportation will be a key consideration in the Destination 2030 update. The issue of funding has been made more prominent and moved up to the front of Part III: Multicounty Planning Policies.

structural standard to support heavy freight vehicles currently using the system. Yet our local freight routes form a critical part of the regional freight route system and serve the needs of regional traffic on a daily basis. Indeed within the City we have over $25M of deferred preservation work on just our designated freight routes alone for which the City has no current identified revenue source to finance the repairs or to reconstruct these routes to a freight standard. We need the region to take heed to this issue and to find ways of addressing this concern. Policy MPP-T-2, requires protection of the existing system, and lowering of life-cycle costs. Auburn supports this policy in particular; however, with current funding sources Auburn cannot preserve much of its arterial system, especially our truck routes that play the most important economic development role for the region. The City needs PSRC to identify funding sources for this need. Reflecting back on our above comments MPP-DP-14 says that the region should give priority funding to transportation infrastructure in the MICs. Since the Valley Cities MIC is critical for the economic vitality of the region, Auburn feels very strongly that the whole region needs to share the responsibility for maintaining the infrastructure of the roads in the cities that serve as warehousing and distribution center for the entire region.

Continuation of C-114-003

We applaud President Singer's efforts to bring this issue forward through the update of Destination 2030. The City of Auburn has a great deal of information on this subject to share with the region. We welcome the opportunity to work with the Economic Development Board and the Transportation Policy Board to promote consideration and adoption of policies and initiatives that will bring the region's arterial system up to a standard that would sustain the region's freight traffic and future growth, enabling all jurisdictions within the region to meet the goals as stated in Vision 2040.

Sincerely,

Peter B Lewis
Mayor
City of Auburn

cc:
Norman Abbott, PSRC SEPA Official,
Sue Singer, Councilmember, City of Auburn
Lynn Norman, Councilmember, City of Auburn

Enclosures:
Map of Valley Cities Road Network
Briefing Paper

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Briefing Paper
September 5, 2007

To: Puget Sound Regional Council (PSRC),
ATTN: Growth Management Policy Board

Subject: Comments on Draft Vision 2040

This staff paper is submitted in response to the invitation for comments for the draft Vision 2040 document dated July 2007. While the document is well written, our primary concerns and comments focus on the inadequate Transportation funding for preserving our arterial system which is a key regional topic. While Vision 2040 does include policies that recognizes the needs for funding the regional system on Page #43, we feel the need to participate in the update to Destination 2030 to assure that regional transportation funding is reallocated on a priority basis to adequately address this need so that cities such as Auburn will be able to achieve the goals stated in Vision 2040.

Purpose of this Briefing Paper

The City feels that a revised regional strategy that creates the essential revenue streams cities and counties need to fully finance our deteriorating arterial system is essential to local governments if we are to achieve the Overarching Goal stated on the top of page #63 of the draft Vision 2040 document. With the drastic decline in revenues that cities have recently experienced, coupled with the spiraling cost of performing arterial preservation work, we need our regional governance to give this issue its full consideration. Continuing the region's customary practice of allocating virtually 100% of regional funding to new capacity and new multimodal purposes, while ignoring the deteriorating arterial infrastructure many cities are left alone to finance, will not likely lead to regional success in achieving the goals as presented. The principal purpose of this briefing paper is to share with you our concerns and to establish the basis for why we need the region to focus on meeting the preservation needs of our existing critical system components. We submit these comments so that cities and counties can achieve the stated goals in the draft document.

There is a nexus related to the impacts that regional freight traffic has on our local arterial system which has not been traditionally recognized or considered for funding at either the

(Comment continues on following pages)

Continuation of C-114-003

C-114-003 (continued) See initial response to this comment.

regional or the state level. Consequently, this regional burden has grown significantly in recent years without an accompanying revenue source to mitigate the impact on the system. While regional economic development depends upon our success to efficiently deliver goods and services, our regional and state level policies and laws do not currently bring a portion of the revenues collected from all classes of freight traffic back to the local level so that cities and counties that are responsible for preserving their portion of the arterial system can finance the necessary work. Instead, revenues are collected at the state level, in accordance with the requirements of the State Constitution, and are expended by the State government on strictly state infrastructure and operational needs while the freight stakeholders who pay the taxes & fees fully expect that these revenues collected from freight companies should be used to manage the entire arterial system and not be limited just to the State's portion of the system.

Regionally, we need to determine the best way to address this burden on local governments with policies that identify and subsequently reallocate funding eligible for preserving the arterial system that the region needs for economic development. We also need to identify new revenue sources to replace those lost as a result of voter initiatives, and ways to better reallocate revenues that fail to keep up with inflation, such as the gas tax. Once the Region has identified new revenue sources, we also need regional support to petition the State to reallocate a portion of the freight revenues collected at the State level back to local jurisdictions that manage a portion of the regional freight system. We believe this focus is imperative as a key regional priority.

So what is the current problem faced by Cities & Counties within the region?

Response: Cities are experiencing inadequate financial resources to maintain a safe & sustainable arterial system which is needed by transit and freight to meet the current and future demands. Due to unsustainable conditions of the pavement of many of our arterial streets, cities may ultimately need to downzone future land use to keep streets safe for the general public, forcing freight and transit to use only those routes we can afford to rebuild. Without additional resources focused at bringing our failing systems back to a sustainable condition, cities will be forced to regulate routes to protect the safety of our motoring public by implementing such strategies as posting weight limits, closing arterials to heavy vehicles, or decreasing the speed limits as pavements crumble. While such remedies can provide safe passage for the general public they are not well received by the transit & freight stakeholders that need to use the system. Within the past two years Auburn has had to resort to closing two freight routes and restricting a third to local hauls - much to the dismay of freight haulers. (See the attached Photos of West Valley Highway) The City would rather be in a more pro-active posture to rebuild these routes making them available for general commercial traffic. However, until funds are available to do so, we will be forced reluctantly to continue this practice.

At the top of page 61 of the draft Plan we note a statement that the region should wisely manage existing funding to get the most out of existing infrastructure giving preservation among other purposes first priority. We acknowledge the wisdom of the statement; however, the region's historic and current practice has favored resource allocation primarily to building new capacity. The City has not seen the PSRC call for projects that legitimizes preservation or rebuilding our streets within the last ten years. So we do not feel that the priority as stated is practiced within the region. Cities in Auburn's situation with significant centerline miles of failing arterials will ultimately have to spend over $85 per square yard to

(Comment continues on following pages)

Continuation of C-114-003

rebuild these routes to handle the heavy loads our freight carries and public transit busses require, rather than spending perhaps in many case less than half that amount today to preserve such pavements before they completely fail. In this sense the region does need to consider a practice, much as it currently does with non-motorized transportation modes, of taking a good portion off the top of the biennial federal transportation funds to rebuild and preserve our critical arterials needed by freight and public transit busses.

Continuation of C-114-003

Background: Auburn is located in north Pierce and south King counties between the cities of Fife and Renton, and is within the second largest regional distribution center on the west coast often referred to as he Valley Cities Distribution Center - located along SR 167. This industrial center supports over 250,000 jobs, spans nine cities, and generates annual state tax revenue of over $200M. Its viability is key to the health of the Ports of Tacoma and Seattle and the four county region. Yet to serve this Center the counties and cities have freight routes which cannot be maintained to a serviceable condition that will to continue to support the current land use patterns while relying on the constrained revenues cities and counties currently receive. Clearly, if future land use plans are designed to support the freight and shipping industry our regional policy and finance strategy will have to change in order to finance the infrastructure needed for the future. Over the past 10-15 years the nine Valley cities from Fife to Renton have seen a continual growth in transportation demand while the revenues that we have historically relied upon to maintain our arterial streets and bridge structures have significantly declined. Revenues have simply not kept pace with demands on our existing system. Freight loads have grown in magnitude and frequency and the transit agencies have increased service on our streets - which were not originally constructed to a standard to support heavy vehicles. The combined demands have greatly impacted the condition of pavement on our arterials. Due to diminishing financial resources Auburn has deferred preservation work that should have been performed many years ago to balance our annual budgets. Meanwhile the traffic growth on our arterial system has accelerated beyond our means to adequately accommodate it..

In 2003 cities received the last funding allocated by the Legislature under local vehicle licensee fees (MVET) after I-695 limited Motor Vehicle License fees (MVET) to $30. In 2003 the Washington State Legislature enacted the Nickel Funding Package which provided cities and counties a half-cent increase over two years, while allocating the lion's share of the Nickel Funding Package towards State arterials. In 2005 the Transportation Partnership funding package was enacted by the Legislature for projects by type of work. Typical projects on this list were as shown on the state website as follows; however, none was allocated to cities & counties:

Projects on this list were grouped in the following sub-lists totaling $7,139.4 Billion, as follows:

Roadway Safety	$3,257.3 M
Preservation	$0.5 M
Ferries	$185.4 M
Multi-Modal Improvements	$94.8 M
Environmental	$108.2 M
Freight Mobility & Economics	$541.1 M
Choke Points & Congestion	$2,952.0 M

In summary, there have been some revenue increases within Washington State for transportation; however, the majority has not come back to local jurisdictions, but rather

was directed to benefit state operated facilities. Over the past 15 years only a half-cent of the cumulative increases in the state gas tax has been returned to cities & counties even though the public has realized a net 14 cent gas tax increase.

Within South King and North Pierce Counties the ports, distribution center land uses, mining, asphalt production, and other industrial land use activities generate large volumes of freight traffic which impact the arterial system that local governments are responsible to maintain. The traffic demands of these key stakeholders needs to be considered when determining the future needs of the system for freight. Indeed these industries play a key role in the region's economy. Our regional governance structure needs to consider the impact of these freight traffic generators on the system and develop appropriate financial resources to accommodate those needs in a manner that does not transfer the burden by default to jurisdictions that own and maintain their respective portions of the system. Freight haulers, whether they are logging, commercial distribution, port freight, or retail distribution all need and rely upon a safe and reliable arterial system that often involves the use of arterials maintained by cities and counties. Our system is seamless to freight haulers. They do not know when they are crossing jurisdictional lines, nor should they need to ask if we as "Government" are doing our jobs. The ports provide significant growth benefits to the region in terms of economic development. Currently the ports' growth strategies heavily influence traffic demand and congestion throughout the system; however, we lack a regional strategy to finance the impacts on arterials maintained by the cities where distribution centers are located. We have encouraged the RTID to finance the highest priority state routes in the interest of promoting regional growth, but we have done very little at the regional level to address the impacts of growth on our existing arterial system. This information should be factored into decisions made by the regional governance structure. The role that PSRC must play in the reallocation of existing resources should not be underestimated! Indeed, Auburn believes that role is essential to the future success of our way of life as we have known it for the last 10 to 15 years. Our regional governance structure has the opportunity to provide some degree of needed coordination amongst the planning activities of all governing bodies and stakeholders within the region including the ports and other freight interests, to ensure that transportation demand and the region's land use system are in reasonable balance and that local revenue needs to finance the "Total System" are met.

While GMA requires cities and counties to manage to concurrency in transportation and land use, it excuses the State or the region from such obligations. As a region, we now need to address this key issue if our regional transportation system is to be adequate to meet regional future economic development goals.

What impacts does Auburn predict if transportation authorities do not provide new revenue for system preservation?

Response: The City of Auburn has already been severely impacted during the last ten years of declining transportation revenues to the point that our current deficit for preserving the Arterial System consisting of some 65 miles of arterial streets amounts to some $60M. An additional $25M of capital is needed to rebuild some 16 centerline miles of failing arterials to meet freight (heavy vehicle) standards. This deficit continues to grow annually. Since 2004 the City has experienced significant increases in the cost of performing street

(Comment continues on following pages)

Continuation of C-114-003

C-114-003 (continued) See initial response to this comment.

preservation due to worldwide increases in the cost of raw materials and oil. The City's annual revenues amount to only $790,000. Between similar street preservation projects bid in 2005 and 2006, the City realized an annual cost increase of approximately 36%. Current revenues have not increased as rapidly, so the city is accruing at an accelerating pace an increasing number of centerline miles of failing arterial pavement. This situation can spiral out of control and will deny future infrastructure to use by freight haulers that the region needs for continued economic development unless the City finds new revenue sources for system preservation.

We need regional leaders to take a good hard look at what is happening in cities with significant regional freight traffic. Our regional governance should provide the financial security for a common and adequate system wide level of infrastructure condition that is designed and constructed to a standard to meet current land use needs. This means that existing Freight and Bus routes, which are necessary for supporting economic development, and existing heavy industry will receive priority of regional funding to assure that the safety features and conditions of roadway surfaces are maintained in a manner that can continue to sustain the needs of these economic sectors while assuring that the motoring public's safety is not compromised.

Continuation of C-114-003

What is the city's current finance structure for transportation?

Response: The City has three fund centers to finance its street system:

Street Fund:
The City's Street Maintenance and Operations Division operates and maintains the public street system consisting of 165 centerline miles of local streets and arterials. The labor, supplies and equipment necessary to run the 10 man Street Division is financed from the City's General Fund supplemented with annual revenues generated from the City's portion of Motor Vehicle Gas Tax.

Local Street Fund: On the November 2004 ballot Voters approved Proposition No. 1, which allows the City's property tax levy to generate money for a Dedicated Local Street Fund used solely for the repair and preservation of Local Streets. The program is called Save our Streets (SOS). Currently the levy generates about $500,000 annually which, when combined with other funding sources, funds the SOS Program with $1.2 million annually. When the fund was initially established oil prices were in the $32 to $45 per barrel price range. With recent oil price escalation to well above $70 per barrel, the City has experienced considerable bid price inflation, and has had to increase the annual subsidy from other revenue resources to assure the annual work effort remains constant to keep faith with the citizens who approved this revenue source.

Arterial Street Fund: Every year the City updates its Transportation Improvement Plan (TIP) with a projection of all capital improvements and known revenue sources for the arterial street system and for the non-motorized sidewalk and trail improvements. At the time of drafting this paper the City is updating its 2008-2013 TIP. In it we provide an updated status of the Arterial System revenue deficits for preservation. Once adopted by the City Council a copy will be transmitted to the PSRC.

Auburn's TIP lists some 45 projects and all known or possible financial resources (State & Federal loans & Grants) for each project. It also lists the current steady revenue sources that the City relies upon to financially constrain the initial three years of the TIP. These current annual recurring revenues are:

1. Motor Vehicle fuel Tax: $1.1 M ($650k is used for maintenance and $450k for capital improvements.)
2. Real Estate Excise Tax: $675,000.
3. Traffic Impact Fees: Estimated at $750,000.

City's Most Significant Challenge:

Since the recovery years following World War II, the City of Auburn has provided the land use required for development of industrial, manufacturing, and distribution businesses. With the completion of SR 167 in the late 70's and the more recent growth of the two ports, the Valley Cities Distribution Center has developed into the second largest distribution center on the west coast. As residential growth of south King and north Pierce Counties has begun to accelerate over the past ten years, SR 167 has reached its peak carrying capacity such that the AM & PM peak periods of traffic can last for 3-4 hours and thus comprise a majority of the normal workday for commuters and general freight traffic. As congestion on SR 167 has worsened, the volume and frequency of freight traffic that uses City & County arterials that parallel SR 167 has dramatically increased. While cities have experienced an acceleration of growth on local arterials, revenues from the Federal, State and Regional levels have diminished. The net result has been that many of our exiting freight routes which were never constructed to a standard to carry heavy vehicles have now failed to the point where a complete rebuild will be required. West Valley Highway is an example of a street which was turned back to the cities and the counties from the State without first rebuilding it to a freight load carrying capacity. As regional freight traffic continues to detour onto this arterial due to congestion on SR 167, the pavement structure is rapidly failing and will ultimately require the City to impose regulations that favor general traffic safety over freight uses. The City's current estimate of existing freight routes that have deteriorated to "Rebuild Candidates" has grown to a current estimate of $25M. Had the City been able to finance this work on West Valley Highway 5 to 10 years ago – before severe deterioration occurred – the pavement structure could have been salvaged at a considerable savings in infrastructure cost – probably less than 50 % of what it will now cost the public to rebuild.

From the perspective of the freight industry at large, freight companies already pay significant taxes, fees, and permit charges to both Federal and State governments, so there is a natural expectation from freight stakeholders that "Government" should use the funds wisely and keep the arterial system in a safe & sustainable condition for the freight industry. However; of all the state and federal taxes paid by the freight industry only a very small portion of the motor vehicle fuel tax collected by the State comes back to cities & counties as street revenue.

Continuation of C-114-003

(Comment continues on following pages)

C-114-003 (continued) See initial response to this comment.

More significantly, of all the fees, taxes and charges assessed on freight companies by the State of Washington that relate to the weight and load carrying capacity of freight vehicles, 100% of this revenue has traditionally been expended at the State level, with 0% distributed back to the City & County level (see Enclosure #1 titled "Gas Tax Revenue and LPF Revenue Distribution based on the June 2007 Transportation Revenue Forecast" a PDF file taken from the State website @ http://search.wsdot.wa.gov/search?q=motor+vehicle+account&search=Search&site=All Sites&client=www&proxystylesheet=www&output=xml_no_dtd)

As regional and interstate freight traffic becomes a larger portion of our City's Arterial traffic burden, it would seem logical that we would have a legitimate share of these revenues coming back directly to the City for purposes of mitigating the ongoing impacts of regional & interstate freight on our local arterials.

Continuation of C-114-003

Transit Burden:

A significant element of regional traffic relates to Transit. Current practice is that Cities are responsible for the upkeep of streets that are bus routes. There are currently no transit funds available to offset the impacts of public transit busses even though the large public transit buses have the highest axle loading of all heavy vehicles that use the system. The City feels this policy should be reevaluated. If growth should pay for growth, then why should we not expect Transit to help pay for impacts on the roads of the jurisdictions that they use? The Regional Council should be looking at such inequities in the interest of promoting economic development by providing the additional financial assistance that local cities and counties need to maintain the parts of the "System" that must function when state routes are insufficient to serve such needs.

C-114-004

C-114-004 Transportation actions are included to speak to the need of funding. For instance, see T-Action-17 in the final VISION 2040. Also, the issue of funding has been made more prominent and moved to the front of Part III: Multicounty Planning Policies.

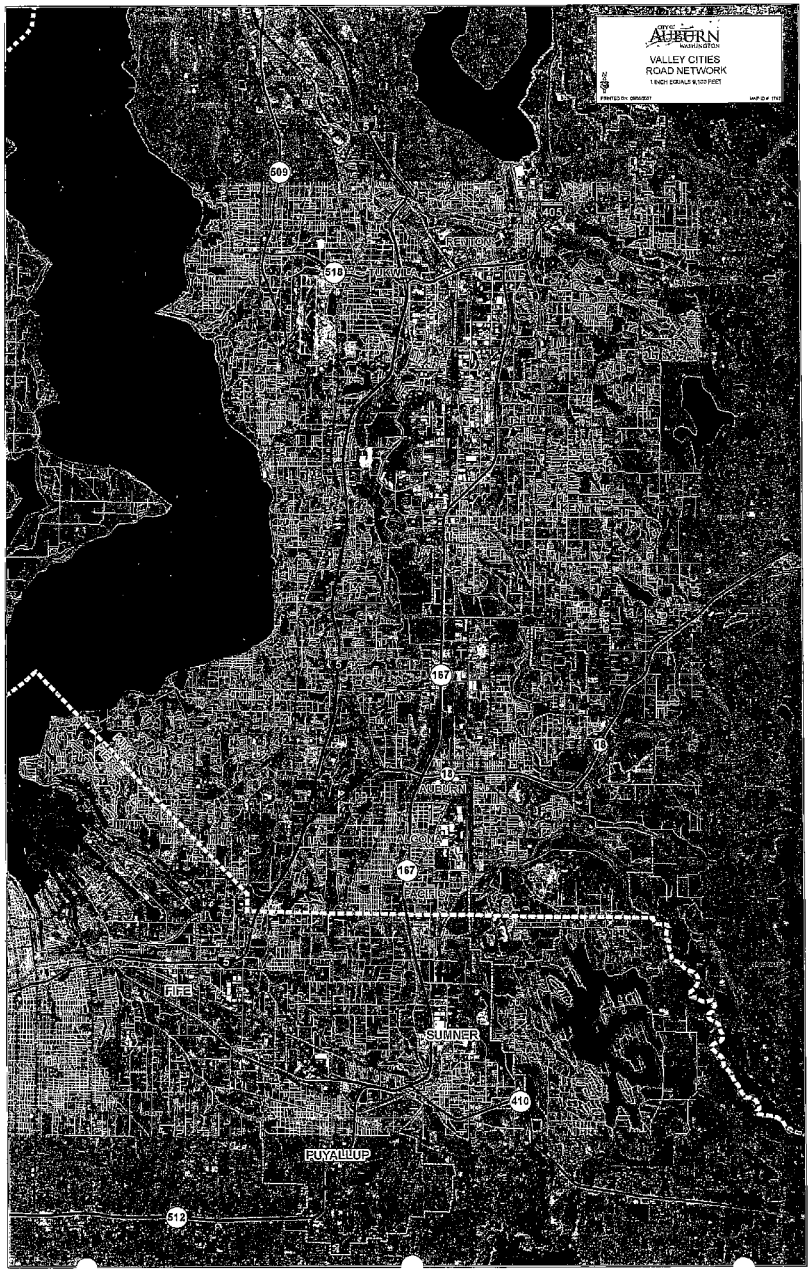
Summary:

There are many industrial & commercial land uses within Auburn that serve the region and which are key to the region's economic success. To name a few we have: Safeway distribution; warehouses that serve the two ports, two local mining, aggregate and asphalt production businesses, and numerous warehouses that serve large retail chains such as Costco. Each of these key regional stakeholders rely upon our arterial system to function. These regional burdens upon the local system are placing increasingly greater constraints on the city's ability to accommodate growth and development and/or to preserve the quality of life our residents desire and deserve. While transportation revenues were shrinking during the past decade, the City has participated in financing capacity increases on a number of major arterials that benefited the flow of regional traffic while simultaneously sacrificing our ability to perform the needed preservation of much of the arterial system. We now need the Regional Council to step up to the plate and assist us with rebuilding a good portion of the arterials that will continue to be needed to serve regional needs, if the region expects to continue to reap the benefit of these key facilities.

Auburn's proposal: The City would like to work with the Economic Development Board and the Transportation Policy Board to promote consideration and adoption of policies and initiatives that will bring the region's arterial system up to a standard that would sustain the region's freight traffic and future growth enabling all jurisdictions within the region to meet the goals as stated in Vision 2040.

C-114-005

C-114-005 While a new policy has not been added, VISION 2040 has been revised to feature the freight provisions more prominently. Also, the Destination 2030 update will provide an opportunity to further address this issue.



Note: This page of comments does not require a response.

City of Bellevue
Post Office Box 90012 • Bellevue, Washington • 98009 9012

C-113

September 5, 2007

Puget Sound Regional Council
c/o Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, Washington 98104-1035

Dear Mr. Abbott,

Bellevue has welcomed working collaboratively with the Regional Council and its members to develop VISION 2040. We appreciate the significant effort PSRC has put into including the ideas and opinions of officials, staff, and citizens during this update process. And, we appreciate PSRC's willingness to be frank in its discussions about the region's future and its responsiveness to comments throughout the process. C-113-001

The hard work of the Regional Council has resulted in a strategy to accommodate the region's growth with a bold, yet viable, plan that seeks to enhance our quality of life and minimize the impacts to our communities. We support the VISION 2040 regional growth strategy to focus growth – and the infrastructure and services needed to serve it – in regional centers. C-113-002

It is important that the VISION policies and implementation strategies support jurisdictions that take action consistent with the plan and are effective at accommodating a significant share of growth, such as policies MPP-DP-11 and MPP-T-9-11 that prioritize funding for and connecting regional centers. The Development Patterns and Transportation sections should include discussion similar to that in the Actions section that describes the need to update the regional funding criteria to be consistent with the centers approach. We agree that the Regional Council should study, track and evaluate regional centers (as called for on page A-1-3 and by policy MPP-DP-10) as a means to reinforce the credibility and effectiveness of the centers concept. C-113-003

The VISION strategy appropriately builds off many successful local plans established within the VISION 2020 framework. While the Multicounty Planning Policies section discusses the relationship between regional, countywide and local plans, we recommend that it also recognize how the implementation of the regional strategy largely occurs at the local level. The Introduction and Development Patterns sections should discuss successes already achieved by current local plans and include examples, such as Bellevue's Downtown neighborhood. C-113-004

The Development Patterns section makes it clear that, by focusing growth in centers, the region is more capable of protecting rural and resource areas. An equally important C-113-005

(Comment continues on following page)

C-113-001 Thank you.

C-113-002 Thank you.

C-113-003 VISION 2040 has been revised to address this issue. Policies were identified and revised to address the prioritization of funds. In addition, the narrative and table describing centers is now clearer, the goal for other centers is more specific, and the policies regarding regional growth centers, manufacturing/industrial centers, and other centers have been clarified with regard to funding prioritization. See what are now MPP-DP-11 and MPP-DP-14 in the final document.

C-113-004 VISION 2040 has been revised to address this issue and now places more emphasis on the role of local governments as the implementing bodies for multicounty planning policies. In addition, a cross reference has been added to connect the introduction of Part III: Multicounty Planning Policies with Part IV: Implementation.

C-113-005 VISION 2040 has been revised to clarify this issue.

aspect of center-focused growth that should be recognized is how it will be used to help protect existing residential neighborhoods and preserve urban open space and local character.

We welcome that this new VISION includes sections on actions and measures that spell out regional, countywide and local level roles. While we support the VISION addressing a broad range of issues, the actions appear to create the opportunity for the Regional Council to significantly expand its role, in areas such as environmental planning and housing. We caution the Regional Council to maintain a realistic work program and to avoid duplication or conflict with other agencies. Several existing agencies, including ARCH, Cascade Water, and the WRIAs already conduct regional-level planning and implementation. As the Regional Council defines its implementation role, we encourage the Regional Council to collaborate with those other jurisdictions and agencies.

While VISION 2040 strengthens the interrelationship between land use, transportation, the economy, and the environment, the section on public services appears less integrated. The VISION should discuss how robust and reliable power and telecommunications systems, and a lasting water supply, are essential components of the region's expanding economy. It may be appropriate to more broadly consider the role and importance of utilities in a subsequent amendment to the VISION.

VISION 2040 addresses our shared interests, ranging from public infrastructure to air quality, and establishes a base framework for managing growth. Yet, the region is made of individual communities. The individual plans for our local communities and regional centers – needed to connect the regional vision to the local context – will be shaped by unique identities, our cultural backgrounds, local economies, and our differing geographies. Continuing to plan locally and to celebrate the individuality of each community is a fundamental component of a successful regional vision.

We thank the staff and the Executive of the Regional Council for leading us through the VISION 2040 update process. Their help and expertise has been instrumental in crafting a better document and a clearer, stronger vision for the region.

Sincerely,

Grant S. Degginger
Mayor of Bellevue

cc: Bellevue City Council

C-113-005 Continuation of C-113-005
C-113-006
C-113-007
C-113-008

C-113-006 Concur.

C-113-007 VISION 2040 has been revised to address this issue.

C-113-008 Comment noted.

City of Bothell

C-145

September 6, 2007

Norman Abbott, SEPA Responsible Official
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

Re: Draft Vision 2040

Dear Mr. Abbott:

On behalf of the Bothell City Council, thank you for the opportunity to respond to the Draft Vision 2040. Our comments are organized under two headings:

- Comments concerning the proposed Regional Strategy for Accommodating Growth; and
- Comments concerning the proposed Multicounty Planning Policies.

Comments concerning the proposed Regional Strategy for Accommodating Growth

One of the ways Draft Vision 2040 departs from the earlier Vision 2020, according to the document, is by moving "from a conceptual plan to a clear and specific strategy based on distributing growth into regional geographies". Regional geographies are "defined by the idea that different types of cities and unincorporated areas will play various roles in the region's future."

Draft Vision 2040 divides the territory represented by the PSRC into seven types of regional geographies - Metropolitan Cities (5 cities), Core Cities (13 cities and the unincorporated community of Silverdale), Larger Cities (13 cities), Small Cities (51 cities), Unincorporated Urban Growth Areas, Rural Areas and Natural Resources lands.

The proposed regional growth strategy focuses the majority of the region's population growth (over 900,000 people) and employment growth (over 850,000 jobs) into Metropolitan Cities and Core Cities.

Bothell is categorized as a Core City. Of Core Cities, Draft Vision 2040 says, "These 13 cities, along with the unincorporated community of Silverdale, contain key hubs for the region's long-range multimodal transportation system, and are major civic, cultural and employment centers within their counties. The regional growth strategy envisions a major role for these cities in accommodating growth."

Under the proposed regional growth strategy, Core Cities would be asked to accommodate 21 percent of total population growth and 29 percent of total employment growth within the four-county region from 2000 to 2040.

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Note: This page of comments does not require a response.

Unfortunately, we cannot divine enough information from the Draft Vision 2040 report to be able to ascertain whether our community's vision of a future Bothell meshes with that embodied in the proposed growth strategy for Core Cities.

Neither the Draft Vision 2040 document nor any of its appendices contain city-specific calculations. Moreover, staff attempts to interpolate population and employment increases for Bothell from the overall Core City numbers under the proposed growth strategy proved fruitless due to a lack of readily accessible information regarding existing population and employment and remaining capacities therefor among the 14 Core Cities. Even if such data had been available, the variety of assumptions which could be applied to each city's growth would have rendered any results extremely unreliable.

Lacking any calculations in which we can place confidence, we are reluctant to support the proposed growth strategy.

Based on our carefully crafted comprehensive plan, we know we can accommodate our 2025 population and employment targets, with a moderate surplus of population capacity and a sizable surplus of employment capacity for future years, when redevelopment potential is taken into account.

Our recent planning efforts have provided for significant intensification of land use while remaining sensitive to and respectful of the attributes of the natural, built and social environments which our community values.

Among other population- and employment-capacity-related actions the City has taken in recent plan and code amendments, Bothell has rezoned two large areas from 40,000 to 9,600 and 5,400 square foot single family lots; provided for lot size averaging within the R 9,600 zone; doubled allowed building heights in an office- and light-industrial-zoned portion of the Canyon Park Urban Center; and both increased allowed building heights and eliminated residential density caps within mixed-use-designated activity centers Downtown and at Canyon Park.

We are concerned that any further increases in population capacity which might be necessary to accommodate growth under the proposed growth strategy could not be accomplished without resulting in fundamental adverse impacts to the character of Bothell. While we believe that all cities and the counties share the responsibility to accommodate growth, we do not support accepting growth to the point where it overwhelms or results in the loss of those natural features, historic resources, intact neighborhoods, welcoming gathering places, and other characteristics by which a community defines itself.

We therefore believe it is of paramount importance in Vision 2040 to ensure that individual cities retain the authority to determine how much growth each can accept in the interests of promoting regional goals without compromising those attributes which make our respective communities unique and special places in which to live.

Comments concerning the proposed Multicounty Planning Policies

We note that Snohomish County Tomorrow, in which we participate, is submitting comments on the MPPs as an organization, and we concur with those comments. We further agree with Snohomish County that ultimate decisions concerning land use,

(Comment continues on following page)

C-145-001

C-145-002

C-145-003

C-145-001 Comment noted. The regional geography unit of analysis leaves specific city level growth target decisions to the countywide planning process required under state law.

C-145-002 VISION 2040 does not change the authority of countywide bodies in the process of establishing growth targets at the individual city level.

C-145-003 VISION 2040 respects the importance of local control over land use decisions.

density, zoning and population and employment allocations must be made by the jurisdictions themselves.

We remain concerned that the link between infrastructure investments - particularly for transportation facilities - and assignment of population and employment numbers is not as strong as it should be. We did not find a transportation policy which directly addresses this.

We request that population and employment allocations be directly tied to, rather than independent of, infrastructure investments. This would address one of the glaring failures of growth management - the protracted delay in, or, in some cases, complete lack of, construction of transportation facilities and other infrastructure to serve growth at adopted levels of service.

Funding mechanisms must be identified and in place to ensure that capital facilities are built and operational when they are needed, or at least in a shorter time span than the six years the Growth Management Act allows for construction of transportation facilities. We recognize that this would require changes in state law, but given the population and employment increases contemplated in the DEIS, failure to address this issue will result in the region literally grinding to a halt.

While we have observed an overall regional gap between growth and the infrastructure to serve that growth, as noted above, we recognize that there are areas and corridors which are currently receiving, and are designated to continue receiving, massive investments in infrastructure, particularly transportation facilities.

We strongly recommend that population and employment allocations be weighted towards those areas and corridors that are served by transportation facilities receiving the greatest regional investments, such as heavy and light fixed-rail transit. We further recommend that final population and employment allocations be subject to financial analyses to determine the feasibility of construction of the rail transit systems and other major transportation facilities which would serve those residential and job centers.

Thank you for considering our comments. We look forward to continued participation with our partner cities, the counties and the PSRC in planning the region's future.

Sincerely,

Mark Lamb
Mayor

Continuation of C-145-003

C-145-004

C-145-005

agbillcd\2006\july\vsn2020+20deisltr-draftltr-071806 3

C-145-004 Stronger provisions have been added to address infrastructure needs. To emphasize this issue, the fiscal policies have been moved up to the General policy section.

C-145-005 Concur. This is one of the objectives of Part II: Regional Growth Strategy.

City of Des Moines

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C-124

September 7, 2007

Norman A. Abbott, PhD, AICP
Director of Growth Management Planning and SEPA Responsible Official
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

Subject: City of Des Moines Comments on the Draft Environmental Impact Statement VISION 2040 Plan

Dear Dr. Abbott:

The City of Des Moines welcomes the opportunity to comment on the VISION 2040 Plan and Supplemental Draft Environmental Impact Statement (SDEIS). Our comments are based on our review of the Draft VISION 2040 Plan and SDEIS as well as information presented by PSRC staff to the Des Moines City Council on August 16, 2007.

We are pleased to see that VISION 2040 plan does not specify minimum densities or specific growth targets for individual cities, thereby allowing a variation from city to city that acknowledges the carrying capacity of the city and honors the discretion that local elected officials must have to accommodate modest additional growth in a way that best meets the needs of their communities. We appreciate that VISION 2040 is integrated with PSRC's two functional transportation and economic development plans – *Destination 2030* and the *Regional Economic Strategy* and support the Plan's focus on the four key elements: (1) the environmental framework, (2) the regional growth strategy, (3) multicounty planning policies, and (4) implementation.

As we indicated in our July 28, 2006 comment letter on the VISION 2020 Update Draft EIS, Des Moines does not agree with the grouping of Des Moines into the Larger Cities geographic sector, and we are very much concerned that the preferred growth strategy would be applied without regard to the ability of largely built out communities like ours to accommodate population growth without severely impacting neighborhoods or our modest commercial areas.

The City of Des Moines has consciously zoned our city to accept the growth targets that we have been given and it is our belief that density decisions should be made by local officials. Local officials need to have this discretion in order to realize their visions for their cities and in Des Moines case, to maintain our city's character and quality of life.

As we have previously stated, Des Moines strongly believes that the carrying capacity of the entire Puget Sound region needs to be considered in an effort to balance the need and desire to accommodate future growth and sustain the quality of life and environment in the region. There needs to be a statewide focus and strategy for allocating growth to other areas in the state.

C-124-001
C-124-002
C-124-003
C-124-004

The Waterland City
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C-124-001 Concur.

C-124-002 Thank you.

C-124-003 Comment noted. The use of regional geographies helps identify types of places in the region based on ability to absorb population and employment growth. The narrative in the Regional Growth Strategy has been expanded to clarify the purpose of regional geographies and to provide detail concerning the distribution of growth. In the future, consideration will be given to reclassifying places as growth or annexation occurs.

C-124-004 The Regional Council did not analyze alternatives that assumed less growth than the 2040 regionwide forecast of 1.7 million new residents and 1.2 million new employees. This decision recognized the charge of the state Growth Management Act to manage rather than control growth and the desire to remain consistent with the State Office of Financial Management (OFM) population forecast process. Studying alternatives that are consistent with the OFM process makes VISION 2040 more useful and understandable to local governments as they apply regional guidance in developing growth targets.

Multi-county Planning Policies (MPPs) promote incentives to help local governments make decisions that reflect the regional vision while being consistent with local visions and needs and protecting established neighborhoods, recognize local discretion in zoning for future jobs and provide financial support for associated infrastructure improvements; specifically:

- Regional transportation and general government service funding must support the ability of cities where population and jobs are focused to accommodate that growth, but "so-called large" cities such as Des Moines will also see growth and will be expected to support commuters and sustain general government services with only modest economic development. Our larger and smaller cities should therefore get a share of general government and regional transportation dollars to provide and even more importantly sustain the transportation infrastructure and urban services.
- Regional and county leaders, MPPs and countywide policies should help rationalize existing municipal boundaries that make current land use planning, transportation planning and development regulation more complicated and ultimately less effective in supporting VISION 2040.
- MPPs should promote transit-supportive land uses as well as regional and local infrastructure improvements that reduce dependency on the single-occupancy vehicle, reduce air and water pollution, are energy efficient, and reduce congestion.
- MPPs should respect local discretion in establishing levels-of-service and transportation concurrency standards.
- MPPs should promote creating quality communities with viable town centers in large suburban cities with environmentally sustainable development, design standards, and innovative programs.

We appreciate the opportunity to offer our comments on the VISION 2040 Plan and SDEIS and look forward to continued coordination with the Puget Sound Regional Council and its member jurisdictions in the continued evaluation of the growth issues for our regions.

Sincerely,

Mayor Bob Sheckler
City of Des Moines

cc:

Mayor Pro Tem Scott Thomasson
Councilmember Ed Pina
Councilmember Dan Sherman
Councilmember Carmen Scott
Councilmember Dave Kaplan
Councilmember Susan White
Tony Piasecki, City Manager

C-124-005
C-124-006
C-124-007
C-124-008
C-124-009
C-124-010

C-124-005 Concur.

C-124-006 VISION 2040 has addressed this issue. Funding is addressed in the General policy section, MPP-G-4, and MPP-G-5.

C-124-007 Comment noted.

C-124-008 VISION 2040 has been revised to address this issue. A subsection titled "Sustainable Transportation" has been added to address issues related to pollution, energy, health, and safety.

C-124-009 Comment noted.

C-124-010 VISION 2040 addresses this issue.

C-103

OFFICE OF THE MAYOR

Ray Stephanson
Mayor

September 5, 2007

Norman Abbott, PhD
Director of Growth Management Planning
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104

RE: City of Everett comments on Vision 2040 SDEIS

Dear Mr. Abbott:

The City of Everett appreciates the opportunity to comment on the Supplemental Draft EIS and Preferred Alternative for the Vision 2040 update. You, your staff, and the various boards and committees that have developed the update are to be commended for the thoughtful process used to craft the Preferred Alternative. City of Everett elected officials and staff members have participated in many of the discussions and forums that have led to this point, and we look forward to completing the adoption process with other members of the PSRC. We would like to offer the following comments for your consideration in the refinement of the final Vision 2040 Regional Growth Strategy.

C-103-001

1. We appreciate that many of the comments the City of Everett offered in its July 31, 2006 comment letter on the DEIS were incorporated into the Preferred Alternative. The use of the Vision 2020 strategy as a starting point, and additional concepts incorporated into the Preferred Alternative (PA), should promote a sustainable development pattern that provides a range of housing choices and job centers served by quality public infrastructure and services. We support the PA region-wide growth strategy that encourages more compact development in well-designed growth centers served by a more efficient multimodal transportation system and high-quality public services.

C-103-002

2. The Preferred Alternative reinforces Everett's role as the metropolitan center for Snohomish County and significantly increases the expectations for both job and population growth within the City and its unincorporated urban growth area (UGA). The tables on page A-3-15 of the Appendices indicate the PA estimated 2040 population for our combined city limits and UGA at approximately 234,400, and the estimated 2040 employment level at 178,100.

C-103-003

(Comment continues on following pages)

CITY OF EVERETT • 2930 Wetmore Ave., Suite 10A • Everett, WA 98201 • 425-257-8700 • Fax 425-257-8729

C-103-001 Thank you.

C-103-002 Thank you.

C-103-003 Comment noted.

3. The PA 2040 population figure represents an increase of 95,000 over the current population, and an increase of 87,000 over current employment. This is the equivalent of adding the current combined populations of our neighbors Lynnwood, Marysville, Mukilteo and Mill Creek; and adding the current combined number of jobs in Lynnwood, Marysville, Mukilteo, Mill Creek, Edmonds, Bothell, Mountlake Terrace, and Granite Falls to our planning area.

4. The PA population and employment figures represent 61,000 more residents and 41,000 more jobs than the 2025 growth targets provided by our adopted GMA comprehensive plan. This means that after we accommodate the growth planned for in our adopted comprehensive plan by 2025, we will then need to add by 2040 the rough equivalent of the combined number of residents and jobs that currently exist in the cities of Lynnwood and Marysville.

5. The above points illustrate that in order to implement the PA vision for 2040, Everett will have to make significant changes to its land use plan. Everett is willing to take on additional growth as the county's metropolitan center, but cannot commit to a specific level of population or employment for 2040 at this time. You have characterized the PA growth figures as planning guidelines. As you are well aware, the actual setting of growth targets under GMA is a collaborative process between each county and their cities. The next round of GMA growth target updates for our region is 2011, which will extend growth targets another 20 years, or to 2031. Therefore, it is unlikely that we will set growth targets for the year 2040 until sometime long after 2011.

6. The City of Everett must first be committed to providing for the quality of life for the population and jobs for which it has currently planned before committing to the increases represented by the Vision 2040 PA. We can only commit to accommodating growth that will lead to the enhancement of our community. Our ultimate ability to accommodate these types of numbers is contingent on continued support from the State and the Federal governments with both appropriate levels of funding and legislation that gives cities the tools needed to provide quality public facilities and services. If we are to take on larger growth targets, we must be able to collect revenues commensurate with the impacts of increased demand for services and capital facilities.

7. The ability of local governments to adequately provide funding for capital facilities and services has been significantly diminished since the original adoption of Vision 2020. Cities that are expected to accommodate substantial levels of job and population growth will be challenged in their ability to provide for the increased demand for such facilities and services. The Vision 2040 document seems to acknowledge this challenge (page 79), but it should also provide policy support for rewarding those cities that are willing to accept greater shares of increased densities and growth. Vision 2040 does so for transportation infrastructure, but does not include such a policy for other types of public infrastructure or services.

Continuation of C-103-003

C-103-004

C-103-005

C-103-004 To add emphasis, funding issues are now in the General policy section of Part III: Multicounty Planning Policies.

C-103-005 VISION 2040 has been revised to address this issue, although a new policy was not added.

8. During the previous DEIS process, the growth levels that were identified for individual cities in Snohomish County alarmed some cities that do not believe the opportunity exists to increase densities in their communities. The PA also has a strong emphasis on curbing expansion of UGA's and limiting the amount of growth in rural areas. It is Everett's position that if the regional growth strategy is to be successful, other cities will also have to accept greater densities and higher growth figures. We would suggest that other cities and unincorporated urban locations be considered as candidates for more intensive mixed-use redevelopment, especially where frequent transit service exists or is likely to be successful.

9. Even if we are able to identify sufficient land use capacity in our planning area to allow for the large growth figures for Everett in the PA, the regional growth strategy cannot be successfully implemented without the full extension of light rail to serve the downtown Everett metropolitan center. This extension must be made far enough in advance of 2040 to allow market forces enough time to respond with higher density development capable of supporting the population and job growth figures of the PA.

10. Serious consideration should be given to serving the Paine Field / Southwest Everett / Boeing Manufacturing and Industrial Center (MIC) with high capacity transit, since it has the largest concentration of employment in Snohomish County. It should be noted that the Regional Growth Strategy map illustrated on page 21 of the draft Vision 2040 document shows High Capacity Transit to downtown Everett that appears to follow precisely the Interstate 5 alignment.

    The decision about the alignment the HCT corridor north of 164th Street will not even be made during the upcoming Sound Transit 2 vote. A future decision by Sound Transit must determine the alignment of a light rail corridor serving Everett. It appears from the map that the regional growth strategy has already determined that light rail will follow I-5 to downtown, and will not serve the Paine Field / Southwest Everett / Boeing MIC. The actual status of the alignment should be reflected in the graphic representation of the regional growth strategy and in the text of the Preferred Alternative.

11. Since the decision about high capacity transit will be decided in future elections by voters in three counties, Everett does not control either the funding or timing of the high capacity transit system. Our ability to provide for the large growth figures in the PA will depend on the design of the HCT system, and the timing and success of future ballot measures proposed by Sound Transit.

12. In order to accommodate the amount of employment projected in the PA for Everett and its UGA, significant improvements must be made to the transportation system between Everett and cities to the north and east, from which many residents commute to jobs in Everett. Transit service capacity from these outlying communities must be significantly increased to accommodate commute trips in order to avoid gridlock or very costly highway improvements not currently within the Destination 2030.

C-103-006

C-103-007

C-103-008

Continuation of C-103-007

C-103-009

C-103-006 The population and employment numbers in the Regional Growth Strategy provide regional guidance that encourages cities to accept growth. Also, see actions related to centers.

C-103-007 Comment noted.

C-103-008 The VISION 2040 map shows the investments contained in the Destination 2030 transportation plan. As part of the update of Destination 2030, the map will be revised based on any changes to the transportation investments.

C-103-007 (continued) See response to previous C-103-007.

C-103-009 The subsection "Greater Options and Mobility" addresses alternatives to driving alone and T-Action-7 addresses transit planning implementation. Furthermore, the issue of transit service increases will be considered when Destination 2030 is updated.

13. We appreciate the strong policy emphasis on providing funding support for transportation improvements that serve the cities and urban centers that are expected to accommodate substantial additional growth. As a metropolitan city with the large growth figures discussed above, we would expect regional funding priority for transportation projects that serve Everett growth centers.

C-103-010 Thank you.

14. We do not believe the continued use of "regional geographies" serves any purpose in the final Vision 2040 regional growth strategy. The thresholds for different categories of cities were determined by looking at population and employment levels in 2000, rather than looking ahead at what each city plans to be or should be in the future. The dialogue box on page 20 of the draft Vision 2040 seems to acknowledge that the population and employment levels in each city will change significantly and will require technical amendments to the vision. Why should you use an arbitrary classification system for cities that will require continuing technical amendments? Wouldn't it be simpler to list the cities that are expected to be the focus of significant growth?

    For example, it is hard to understand the difference between Mukilteo (a "larger city") and Mill Creek (a "small city"), when Mill Creek's current UGA population exceeds Mukilteo's by 19,000 people, and its 2025 UGA population target is double that of Mukilteo. Similarly, Lynnwood is considered a considered a "core city," with a current UGA population of 56,000 and a 2025 growth target of 78,000, while Marysville is considered a "larger city" (which is lower in the hierarchy of regional geographies), with a current UGA population of 55,000 and a 2025 growth target of 80,000.

C-103-011 Do not concur. The regional geographies serve a useful purpose in helping to recognize the differences in the region.

15. Page 41, "Centers in Vision 2040," designates Everett as a metropolitan city, the only one in Snohomish County. The chart states "Major investments for transportation and other services and facilities are targeted for these locations." We appreciate the recognition Vision 2040 gives to this role and emphasis given to supporting regional investment in our city by MPP-DP11. However, it is not clear that for services and infrastructure other than transportation, that the PSRC has a role in funding or, if available, determining how funding for non-transportation related services or infrastructure is distributed in the region.

C-103-004 See initial response to this comment. (continued)

16. MPP-DP-12 encourages continued focus of employment growth in designated manufacturing and industrial centers (MIC's), such as the Paine Field / Boeing / SW Everett MIC. MPP-DP-14 gives priority to funding transportation and infrastructure for economic development to MIC's. We reiterate here that these policies lend strong support for serving the Paine Field / Boeing / SW Everett MIC with high capacity transit (light rail). This decision will be made far into the future under Sound Transit's Phase 3 planning. The policies cited herein should be construed as strong regional support for serving the largest employment center in Snohomish County with light rail when that decision is put before Sound Transit's board.

C-103-008 See initial response to this comment. (continued)

17. We appreciate the housing policies (MPP-DP-31 through 37), which emphasize the need to accommodate affordable housing and special needs housing across the region. Everett hosts a disproportionate percentage of low income and special needs households. We recognize that our role as the metropolitan center for our county will continue that trend to a certain extent. However, we believe that other cities within our county and the region need to take a more proactive role in providing opportunities within their communities for affordable and special needs housing.

C-103-012

18. The Transportation Policies are supportive of the regional growth strategy. However, the availability of funding for transportation improvements within our region is not sufficient to meet demand. Initiatives such as RTID and ST2 should, if successful, improve regional mobility. But additional resources are needed at the local level just to meet local demands to maintain and improve the transportation system. The high growth figures of the PA for Everett will increase the need and demand for City-funded transportation improvements. We understand that following the adoption of Vision 2040, the PSRC will update Destination 2030 to correspond to the growth strategy and planning horizon of Vision 2040. We encourage you to consider in the Destination 2030 update process how additional resources may be made available to cities and counties for the important local improvements that will not compete well for regional transportation funds.

C-103-013

C-103-014

19. Page 82 of the Vision 2040 has a section entitled "Policy and Plan Review," which includes a section on review of *Subarea Plans for Designated Regional Growth Centers*. It states that each city with a regionally-designated center should prepare a subarea plan within four years of the designation of the center, which will then be reviewed by the PSRC for certification. Everett has two regionally designated centers – its downtown and the Southwest Everett / Boeing MIC. Each of these areas has been the subject of a subarea plan. Everett's downtown plan won a Vision 2020 award this year, and the SW Everett subarea plan was the first Planned Action under State law, adopted in 1997. We presume that these existing subarea plans will meet the requirements for certification and that new subarea plans will not be required for these centers.

C-103-015

20. The "Measures and Monitoring" section (page 84) describes how certain indicators of performance will be tracked to help determine how the regional growth strategy is working. We support this effort and the need for ongoing collection of data and information to evaluate performance. We suggest that the establishment of indicators be based on metrics that can be readily compiled by the PSRC without the need to place substantial workload burdens on local governments. Quality control and uniformity of data will be much greater if you do not have to rely on complex reporting by local agencies, who will have differing levels of ability or interest in compiling data across the region.

C-103-016

C-103-012 Concur. Policies promote all jurisdictions to participate.

C-103-013 Comment noted. These issues will be considered during the Destination 2030 update.

C-103-014 Fiscal resources will be considered when Destination 2030 is updated.

C-103-015 Local plans (including center plans) and countywide planning policies are always reviewed based on the regional provisions in place when local plan or countywide policies were adopted. Amendments or updates to local plans or countywide policies adopted after the adoption of VISION 2040 will be reviewed based on VISION 2040 provisions.

C-103-016 Concur. For the monitoring program to be effective, some level of participation on the part of local governments will be necessary.

21. The Actions described in Appendix 1 include many statements that appear to be expanding the role of the PSRC beyond functions in which it has traditionally been involved. This is understandable given the breadth of the actions called for by the regional vision, and the lack of other regional forums that give all of the cities, counties, and other affected agencies, districts and interests the opportunity to address common issues. Care should be taken to not create duplication of efforts with existing agencies. We also would encourage the PSRC not to create additional unfunded mandates on local governments through the implementation actions of the regional growth strategy.

22. The City of Everett water system has grown over the last century from a simple localized system for the residents of Everett to a vital regional water provider. The Everett water system supplies water to the majority of Snohomish county residents through a network of 66 direct and indirect wholesale customers. The City's current Water Comprehensive Plan looks at conveyance and treatment needs from 2006 to 2010. We update our Plan every 6 years and utilize the most current PSRC projections to make sure we can accommodate the growth planned for the regional water system. The population figures in our current Water Comprehensive Plan exceed the PSRC 2040 projections by about 3%.

23. The City of Everett sewer system provides conveyance and treatment needs for more than 136,000 people treating some of the sewer from three neighboring sewer systems. The City of Everett sewer system utilizes its Sewer Comprehensive Plan to guide the infrastructure improvements over the next 5 to 10 years. The current Plan looks at conveyance and treatment needs from 2006 to 2050. We update our Sewer comprehensive Plan every 6 years and utilize the most current PSRC population figures to make sure we can accommodate the growth planned for the City. The population figures used in our current Sewer Plan are about 5% below those identified by the PSRC 2040 projections. The proposed 2040 growth figures will require the City to evaluate potential improvements to the sewer system sooner than anticipated in order to ensure sufficient capacity for the larger job and population forecasts.

24. The Vision 2040 document recognizes that all jurisdictions must take additional actions to address surface water quality in order to clean up the Puget Sound. The costs to local government will be significant.

The City of Everett looks forward to working with the PSRC and other member jurisdictions to refine the Preferred Alternative and improve the regional growth and transportation strategy. Please contact Allan Giffen, Planning Director, if you have any questions about these comments.

Sincerely,

Ray Stephanson
Mayor

C-103-017
C-103-018
C-103-019
C-103-020

C-103-017 Comment noted.

C-103-018 Comment noted. The EIS has been updated to include this information.

C-103-019 Comment noted. The EIS has been updated to include this information.

C-103-020 Comment noted.

c: City Council
Planning Commission
Allan Giffen, Planning Director
Tom Thetford, Public Works Director
Tom Hingson, Transportation Services Director
Dave Davis, Engineering and Public Services Director
Ryan Sass, City Engineer
Dave Koenig, Long Range Planning Manager

Note: This page of comments does not require a response.

C-105

CITY OF ISSAQUAH

P.O. Box 1307, Issaquah, WA 98027

Ava Frisinger, Mayor
(425) 837-3020 / FAX (425) 837-3029
mayor@ci.issaquah.wa.us

September 6, 2007

Mr. Norman Abbott
Director of Growth Management Planning
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

Dear Mr. Abbott:

Thank you for the opportunity to comment on the Vision 2040 Preferred Alternative and the Supplemental Draft Environmental Impact Statement (SDEIS). I appreciate the effort of the Puget Sound Regional Council (PSRC) to meet the challenge of extending the regional planning vision to the year 2040. I also appreciate the assistance provided by the PSRC staff to help us evaluate the latest information.

While there seem to be a few potential areas for further improvement, the draft Vision 2040 document responds to many of the concerns we noted in our original letter on the Vision 2020+20 DEIS. The PSRC should be congratulated on the significant progress made so far. I am submitting the following comments for consideration by the PSRC as the work to finalize Vision 2040 continues:

1. Regional Development Pattern: We appreciate the statements in the draft Vision 2040 Plan recognizing the current urban growth boundary as largely sufficient to accommodate anticipated growth to 2040. Proposed policies such as MPP-DP-6 promoting a stable and sustainable urban growth area are to be commended. Achieving this outcome will require ongoing effort by all jurisdictions in the region, but I believe this is something we can accomplish if we continue to work together. One of the tools to help accomplish this goal will be the "subregional and secondary centers" concept. I believe there is room for further improvement in this regard:

- Many of the sub-regional centers are in reality regional centers of smaller scale. The centers concept could be further developed to account for "sub-regional" centers such as Issaquah that serve an increased regional transportation role due to geography and available transportation facilities. The current listing by "regional geographies" does not seem to fully account for such regionally important places.

- The implementation commitment to pursue additional funding and incentives for centers noted in Appendix 1 only mentions designated regional growth centers. A few of the proposed policies, including MPP-DP-17, MPP-DP36, and MPP-T-9 mention financial support for smaller centers, while others such as MPP-DP-11 and MPP-T-10 only give priority to designated regional centers. As noted above, many of the smaller centers serve a regional role. This should be taken into account in all funding considerations. While priority may be given to designated regional centers, smaller centers should be eligible to compete for a portion of all regional funding sources.

2. Preferred Alternative: The City of Issaquah appreciates the effort of the PSRC in developing the preferred alternative. This alternative responds to our concerns with the original DEIS choices and incorporates some of their better features into a more sustainable hybrid that is more consistent with existing comprehensive plans. We also appreciate the clarifications that recognize final growth targets are best determined at the local and countywide levels.

(Comment continues on following page)

C-105-001

C-105-002

C-105-003

C-105-004

C-105-005

C-105-001 Comment noted.

C-105-002 Thank you.

C-105-003 VISION 2040 has been revised to address this issue. The narrative and table describing centers is now clearer, the goal for other centers is more specific, and the policies regarding regional growth centers, manufacturing/industrial centers, and other centers have been clarified with regard to funding prioritization.

C-105-004 VISION 2040 has addressed this issue. See what is now policy MPP-DP-13, which includes a reference to "other activity nodes."

C-105-005 Thank you.

We are currently in the early stages of the Central Issaquah Plan, a new plan for the Issaquah valley floor that, among other tasks, will include analysis of our potential development capacity in support of Vision 2040. Until this plan is complete, however, it appears that the potential amount of growth attributed to Issaquah as one of the King County "Larger Cities" is generally compatible with the current Issaquah Comprehensive Plan carried forward to 2040. (This observation is contingent upon our peer cities accounting for a proportionate share of the projected growth as well.)

3. Transportation Planning and Impact Mitigation: We appreciate that the Vision 2040 draft notes several worthwhile implementation activities in Appendix 1, including working to identify new transportation funding sources and new approaches to regional concurrency when available funding may fall short. However, the draft still defers many transportation planning decisions to a future Destination 2030 update without specifically committing to such an update. Observations in this regard include:

- Given that an update to Destination 2030 can not occur simultaneously, it would seem appropriate to note this as a "Transportation Action" in Vision 2040, Appendix 1. While many transportation implementation activities are noted, the Destination 2030 update does not appear to be listed.
- The Vision 2040 draft and the SDEIS do not provide sufficient detail to determine impacts to specific roadways, particularly those of regional significance. It would be helpful if more specific information regarding the anticipated transportation impacts of the preferred alternative could be added to the SDEIS, the Vision 2040 Appendices, and/or the pending Destination 2030 update.
- The Preferred Alternative, while significantly improved, still places a disproportionate impact on Issaquah in terms of transportation due to the reliance of Sammamish and other nearby communities on Issaquah for I-90 access. It would be beneficial for either the current plan or the Destination 2030 update to identify regional transportation investments and funding to mitigate such impacts that are clearly regional in nature.

Please continue to provide all relevant information and notification of opportunities to participate in the planning process as Vision 2040 continues to move ahead. We look forward to continuing to work with the PSRC as the preferred alternative is finalized and adopted.

Sincerely,

Ava Frisinger

Ava Frisinger
Mayor

AF/MH/jm

cc: Issaquah City Council
Mark Hinthorne, Director of Planning
James Matthews, Senior Planner

C-105-005 Continuation of C-105-005

C-105-006 C-105-007 C-105-008

C-105-006 VISION 2040 has been revised to address this issue. See T-Action-1.

C-105-007 Given the regional scale of the alternatives and the large variation of conditions among local areas, the level of detail for the alternatives and the environmental analysis has been conducted at a broad programmatic scale. Localized impacts of growth could vary, but would depend on more specific actions that would be considered and approved through local or project-level processes. As appropriate, a greater level of analysis on transportation performance will be conducted during the Destination 2030 update.

C-105-008 The issue of regional investments and mitigation measures will be considered during the update of Destination 2030.

September 7, 2007

CITY OF LAKE STEVENS

C-122

Puget Sound Regional Council
Mr. Bob Drewel, Executive Director
Mr. Norm Abbott, SEPA Responsible Official
1011 Western Ave., Suite 500
Seattle, WA 98104

Subject: Draft Vision 2040 Comments

Dear Mr. Drewel and Mr. Abbott,

Thank you, Mr. Drewel, for attending our City Council meeting this week to review the Draft Vision 2040. The City recognizes and appreciates the large effort in developing a growth strategy for the Puget Sound Region that works for the four counties and 89 local jurisdictions. The following comments represent the long-term vision for the City as it relates to our role in the region and within Snohomish County. We urge you to incorporate the principles of this vision into the PSRC Vision 2040 Growth Strategy.

C-122-001

C-122-001 Thank you.

Background:

In 2005 the City of Lake Stevens embarked on a progressive 6-year program to annex the entire Urban Growth Area to become "*One Community Around the Lake.*" The 2025 population projection of 46,125 will make Lake Stevens the largest non-Interstate 5 Corridor city in Snohomish County. That outcome carries a heavy responsibility for ensuring a sustainable and livable community that the City accepts.

The current demographics for Lake Stevens suggest that a strong majority of the working population must commute to the south and west outside of the City and UGA for family wage jobs. This conclusion is further substantiated by the unbearable traffic issues on the US2 Highway Trestle during the peak commuting hours. Several other eastside cities face this issue.

Comments:

In addition to supporting the comments sent by the Snohomish County Tomorrow Steering Committee, the City submits the following comments.

1812 Main Street / P.O. Box 257 • Lake Stevens, WA 98258-0257 • (425) 334-1012 • Fax (425) 334-0835

The Vision 2040 document does not reflect the City of Lake Stevens boundaries. The current city limits now cover the entire north end of the Lake and extend south and southwest around the lake along Market Street just past the Frontier Village shopping center and across State Route 9 (see enclosed map). The City has doubled in population since 2004 to just over 14,000 with the entire UGA, including the City limits, estimated at approximately 29,000. The City now makes up almost half of the UGA. We understand that you are working with data from a fixed period in time but feel it does not indicate the current conditions from which to develop a 30-year vision reflective of the changing landscape in Lake Stevens. For example, the Vision 2040 Plan does not show the City is moving from a "smaller city" to becoming a "larger city" classification. This acknowledgement is critical to future regional transportation planning efforts.

C-122-002

The Growth Strategy for a high percentage of the population growth in Snohomish County is targeted to the unincorporated Urban Growth Areas suggesting Snohomish County as the urban service provider instead of cities. This is particularly highlighted in Lake Stevens because of the size of the UGA which is primarily residentially designated land. The City of Lake Stevens is committed to completing the 6-year annexation program because we strongly believe that local residents are better served by their local service provider, consistent with the Growth Management Act. Local oversight of balanced land use and urban design is paramount to the success of our community.

C-122-003

Many of the proposed regional growth strategy and transportation goals can be advanced and achieved for the region and, more specifically, Snohomish County by creating and supporting a significant job base on the eastside of Interstate 5. Lake Stevens' vision is to become that employment center for the eastside. There is land available within the current UGA to support this vision. Also, we are planning to add part of our Rural Urban Transition Area (RUTA) into the UGA to further support that vision and provide additional transportation connectivity at US2 and State Route 9.

The goal as a major employment center provides transportation alternatives to long commutes and introduces a "reverse" commute condition alleviating traffic volumes that bottleneck on the US2 Trestle. The goal also provides Lake Stevens area residents with economic benefits as well as works towards reduction of environmental concerns including those issues contributing to global climate change.

We believe our mutual goal is sustainable and livable communities and by becoming the employment center for the eastside of Snohomish County we can significantly contribute to improving and sustaining the area with a growing population while preserving the natural environment in the Puget Sound Region

C-122-004

(Comment continues on following page)

C-122-002 VISION 2040 includes a technical amendment process for addressing this issue.

C-122-003 Comment noted.

C-122-004 The use of regional geographies helps identify types of places in the region based on their role and ability to absorb population and employment growth. The narrative in the Regional Growth Strategy has been expanded to clarify the purpose of regional geographies and to provide detail concerning the distribution of growth. In the future, consideration will be given to reclassifying places as growth or annexation occurs.

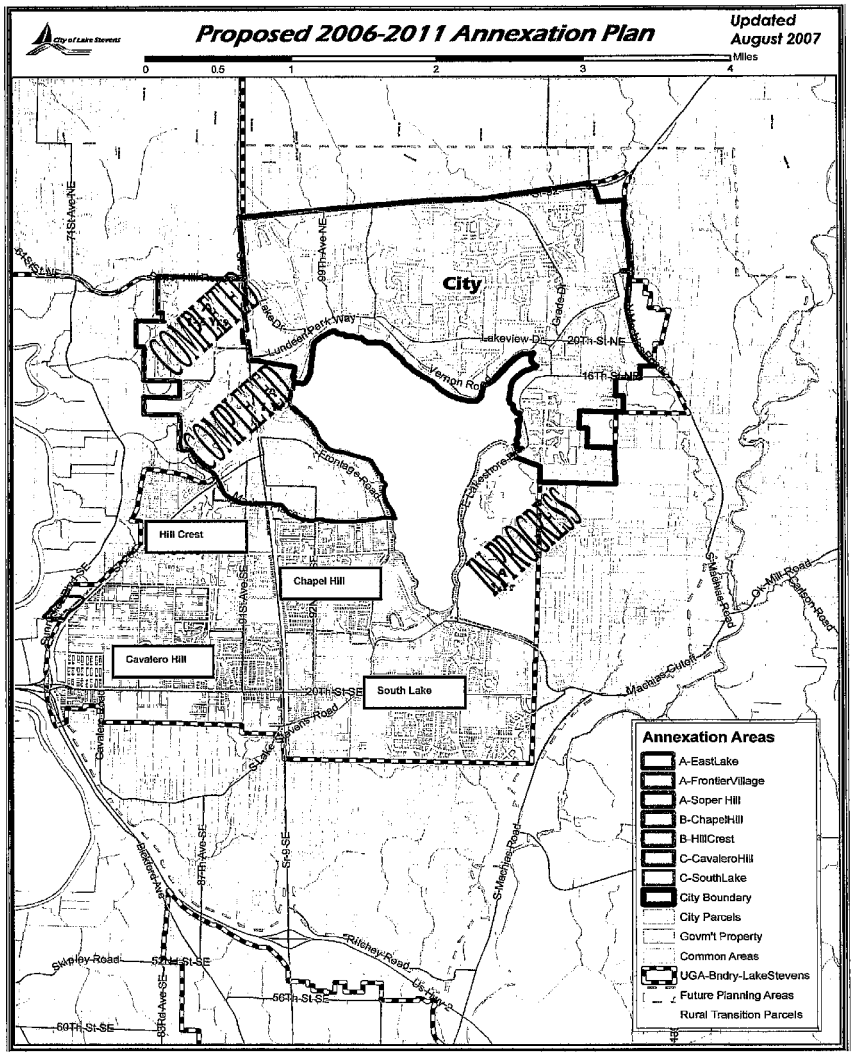
consistent with the overall growth strategy. The City wants support and assistance from PSRC and Snohomish County to reach that goal and asks that our vision be reflected in the 2040 plan.

Continuation of C-122-004

Sincerely,

Vern Little
Mayor

cc: City Council
County Council
Aaron Reardon, Snohomish County Executive
Jan Berg, City Administrator
Rebecca Ableman, Planning Director
Dave Ostergaard, Public Works Director
Craig Ladiser, Director, Snohomish County Planning & Development Services



Note: This page of comments does not require a response.

City of Lakewood

C-144

Dr. Claudia B. Thomas
Mayor

John Arbeeny
Deputy Mayor

Ron Cronk
Council Member

Pad Finnigan
Council Member

Helen McGovern
Council Member

Doug Richardson
Council Member

Walter Neary
Council Member

Andrew E. Neiditz
City Manager

Heidi Ann Wachter
City Attorney

Alice M. Bush, MMC
General Services Director
City Clerk

September 7, 2007

Norman Abbott
SEPA Responsible Official
Puget Sound Regional Council
1011 Western Ave., Ste. 500
Seattle, WA 98104-1035

Dear Norman:

Thank you for the opportunity to submit comments on the draft VISION 2040 plan. We have the following substantive comments:

P. 37, Proposed Policy MPP-DP-5. This policy is overbroad and may be used against resource operations that have predated adjacent growth. Most of us can cite examples of "I didn't know the dairy farm next door smelled so bad/started making noise at 3am when I bought my home in the new subdivision next door." Noise, odor, and certain other impacts are bound to come from resource land operations, and they may pose certain adverse impacts to adjacent uses that came after them. The suggested policy would make long-standing resource uses subservient to nearby new development. In this sense, the policy may create an internal inconsistency with other policies designed to support resource operations. C-144-001

P. 41, "Centers in VISION 2040" table. Where it states that metro and core city centers are "designated by PSRC," it would be optimal to clarify there is still a local designation of specific center boundaries that's part of the individual jurisdiction's comp plan process. C-144-002

P. 42, "Designated Regional Centers" table. Title is inconsistent with use of term "regional growth centers" in text. Is it intended to mean the same thing, or something different? C-144-003

P. 61, Policy MPP-EC-9. While a high-quality education system is certainly a laudable goal (*not* policy), it is unclear how this falls within the purview of regional or local planning and how we are to "ensure" this. C-144-004

P. 78 – "Siting Facilities" text and policies on following page. This does not seem to get at the full realm of "essential public facilities" under GMA, some of which are most appropriately sited in rural areas. Thought should be given to adding some meaningful discussion of and policies responsive to the complexities of siting certain such facilities. C-144-005

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C-144-001 VISION 2040 has been revised to address this issue. MPP-DP-4 now references adjacent lands, and MPP-DP-5 was deleted.

C-144-002 VISION 2040 has been revised to address this issue. The narrative and table describing centers is now clearer, the goal for other centers is more specific, and the policies regarding regional growth centers, manufacturing/industrial centers, and other centers have been clarified with regard to funding prioritization.

C-144-003 See response to C-144-002.

C-144-004 Education is a key goal of the Prosperity Partnership's Regional Economic Strategy. Local governments have the ability to support educational institutions through zoning, public investments, and more.

C-144-005 Siting of "essential public facilities" is controlled by state law.

P. 82 – Policy and Plan Review – introductory paragraph plus "Review of Local Comprehensive Plans, Including Certification of Transportation-Related Provisions" paragraph. We commented on this previously in response to the draft EIS, repeated here below. The substitution of the word "provisions" for "elements" does not satisfy our concerns.

> It is my understanding that, under RCW 47.80.023(3), the PSRC, in its role as RTPO, is responsible for the certification of local plans' transportation elements, *not* "transportation-related elements." (Also ref. WAC 365-195-325(2)((i)(D)(ii).) I also do not believe that is PSRC responsible for *certifying* that local plans and amendments "comply with the Growth Management Act, and are consistent with regional guidelines and principles for planning," (top of p. 3.5) except inasmuch as it relates to PSRC's specific certification authority for transportation elements. Certainly the PSRC is to look at the transportation element in relationship to other plan elements under RCW 47.80.026, but it does not appear that PSRC has actual certification authority over more than the transportation element.

General – Goals & Policies. In some cases policies are set forth with no goal statement. Where this is the case, a goal statement should be developed for each set of policies which the policies are intended to serve. Or, suggest reordering policies that currently lack goal statements to incorporate them under goals to which they most strongly relate.

This completes the City's comments. We look forward to continuing to work with you as the VISION 2040 planning process proceeds. If you have any questions or need additional information about any of our comments, please contact me at 253.983.7770 or e-mail <djohnson@cityoflakewood.us>.

Sincerely,

Deborah Johnson
Senior Planner
Community Development Dept.

C-144-006

C-144-007

C-144-006 Comment noted. See T-Action-9 "Certification Update" (the process for certifying transportation elements in local comprehensive plans). PSRC reviews the entire local plan, but certification applies to the transportation related provisions.

C-144-007 This idea was considered in the update process and not accepted. Each policy section begins with an overarching goal that provides an "umbrella" for all policies in that section. Some smaller sets of policies did not warrant a separate goal.

City of Poulsbo

Barry Berezowsky, Planning Director/Building Official

C-159

September 7, 2007

Mr. Rocky Piro
Program Manager
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

Dear Mr. Piro:

I am writing this letter to express concerns brought to my attention by members of the Poulsbo City Council after hearing a presentation by Regional Council staff on the Draft VISION 2040 plan. While I understand that some of these concerns may have been alleviated through email exchanges between Council members and Regional Council staff, I feel it is important that the City of Poulsbo's concerns be formally communicated to the Regional Council via this letter.

First, let me state that I have reviewed the draft VISION document and commend the Regional Council staff for another excellent job charting an achievable course for all of us who want to maintain our quality of life here in the Puget Sound region.

Our main concern is related to a statement that was made, and I paraphrase, "that growth through 2040 would be accommodated by **existing** urban growth areas". My understanding is that the presenter also confirmed this was in fact the policy under consideration in the VISION 2040 document. As communicated via email to yourself, Poulsbo is troubled, if in fact this is the intended policy, as it would mean small cities such as Poulsbo would no longer be in control of their land use vision – we, as well as other small cities, would be forced to accommodate significant increases in density within our existing urban growth areas leading to dramatic changes in density and the character of our cities.

In addition, if this is the policy intent of VISION 2040 a great deal of work accomplished by the Kitsap County Regional Coordinating Council (KRCC) would be undone. The KRCC has spent a considerable time developing policies to guide consideration of UGA expansion and to have this policy and process overridden by multi-county policies would be unfortunate.

(Comment continues on following page)

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C-159-001

C-159-002

C-159-001 Thank you.

C-159-002 Comment noted.

Upon closer review of the VISION 2040 document I was unable to find policy language to support the statements made during the Poulsbo presentation, but did find language on page 37 under the Urban Growth Areas heading that does support Council's concern. This section states *"[t]he regional growth strategy was developed with the understanding that with good planning and efficient land use, existing urban growth area designations can accommodate the population and employment growth expected by 2040."* Perhaps this is the source of this particular concern.

On another note, I wish to express concern in regard to MPP-DP-26 which suggests we should "avoid" designating new fully-contained communities. While I have read some of the emails addressing this policy – both pro and con – I do not support language that strongly discourages new fully contained community's when they are allowed under the law. Perhaps the alleged failures should be used as learning tools to assist in ensuring that future efforts to implement this provision of the law are successful. Furthermore, would their failure, if in fact this is the case, be more a reflection on us as planners and implementers? Regardless, I cannot support language of this nature simply because these types of communities have been perceived to have failed in accomplishing their goals.

I trust you will take the City's concerns into consideration as you make final edits to the document to ensure that the policy intent of the document is not altered by descriptive statements which may be interpreted to show policy intent.

In closing I wish to express my sincere appreciation in the Regional Council's work to-date and look forward to working with you and your staff in the future.

Best Regards,

Barry Berezowsky
Planning Director

cc: Mayor Kathryn H. Quade
City Council Members

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Continuation of C-159-002

C-159-003

C-159-003 Comment noted.

CITY OF RENTON

Economic Development, Neighborhoods and Strategic Planning
Alex Pietsch, Administrator

Kathy Keolker, Mayor

C-175

September 17, 2007

Norman Abbott
SEPA Responsible Official
Puget Sound Regional Council
1011 Western Ave, Ste 500
Seattle, WA 98104-1035

Dear Mr. Abbott: Norman

Thank you for the opportunity to comment on the Draft Vision 2040 and the Draft Supplemental EIS. The Preferred Growth Alternative is overall the most consistent with Renton growth strategies as adopted in our Comprehensive Plan. Renton is appropriately classified as a Core City with a Regional Growth Center. The Preferred Alternative supports our efforts to redevelop Renton's Urban Center as a vigorous mixed-use community providing both jobs and housing to future residents. It also supports our desire to achieve quality infill single-family neighborhoods and provide opportunities for condominium and townhouse development close to existing commercial areas outside the Urban Center. We agree with the strategy of shifting growth from the Potential Annexation Area closer into the center of the City where it can be better served by existing utility and transportation infrastructure. For King County, this aspect of the Preferred Alternative is important to recognize and support with or without annexation.

We strongly support the policy framework establishing funding priority for transportation infrastructure and economic development within designated Regional Growth Centers.

The Transportation Goals and Policies in the Draft Vision 2040 are beneficial to Renton's transportation interests. The Goals and Policies encourage a safe and efficient multi-modal transportation system, particularly related to transit, bicycle, and pedestrian accessibility, which is also a goal of Renton's transportation strategies.

- In general, the Preferred Growth Alternative is most beneficial to transportation interests. It would increase transit accessibility, reduce congestion and delay, and decrease pollution compared to the Smaller Cities Alternative or the Growth Targets Extended Alternative.
- This alternative would decrease vehicle use and promote higher usage of transit; thus making bicycling and walking more feasible travel mode options.
- This alternative also has better access between employment and housing via transit; there are also shorter travel times and distances due to a closer proximity between employment options and housing availability.

C-175-001 C-175-002 C-175-003 C-175-004 C-175-005 C-175-006 C-175-007 C-175-008 C-175-009 C-175-010

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C-175-001 Comment noted.

C-175-002 Comment noted.

C-175-003 Concur.

C-175-004 Concur.

C-175-005 Thank you.

C-175-006 Concur.

C-175-007 Comment noted.

C-175-008 Concur.

C-175-009 Concur.

C-175-010 Concur.

Comment Letter

- This alternative is also more beneficial for minority and low-income residents, due to the adjacency of transit options and access.

The Economic Development Goals and Policies support business and job creation and are consistent with our local approach to diversification of our tax base, business recruitment and retention, and re-investment in the existing community. The Goal of creating "great central places" that integrate transportation, the economy, and the environment is one that we enthusiastically support. The refinement of the VISION 2020 to provide more direction on quality urban development, responsible and sustainable " green" communities, healthy and active pedestrian supportive land use is a positive.

The Housing Goals and Policies presented in this draft are also consistent with Renton's approach to affordability, green building, diversity/range of housing types, and a concentration of housing opportunity in the urban area.

We support a regional approach to enhance efficiency and coordinated Public Services agree with the emphasis in the Public Services and Utilities section of the document on concentrating service in urban areas and encouraging the consolidation of special service districts.

Overall, the Preferred Alternative and Goal/Policy strategies provide a consistent approach to regional growth that still allows cities the flexibility to respond to local conditions. Each community in this region has an important identity and character. In the face of growth, we do not want to lose sight of what we have.

Sincerely,

Alex Pietsch
Administrator

C-175-011
C-175-012
C-175-013
C-175-014
C-175-015
C-175-016
C-175-017

Response to Comment Letter

C-175-011 Concur.

C-175-012 Comment noted.

C-175-013 Thank you.

C-175-014 VISION 2040 has been revised to address this issue.

C-175-015 Comment noted.

C-175-016 Comment noted.

C-175-017 Comment noted.

C-176

Gregory J. Nickels
Mayor of Seattle

September 21, 2007

Puget Sound Regional Council
Norman Abbott, *SEPA Responsible Official*
1011 Western Ave, Suite 500
Seattle WA 98104-1035

Dear Mr. Abbot:

I appreciate the opportunity to comment on PSRC's Draft 2040 VISION plan and the Supplemental Draft Environmental Impact Statement. It will be a challenge to accommodate the additional 1.7 million people and 1.2 million new jobs expected to be in the region by the year 2040. I commend PSRC staff for making complex policy recommendations and detailed evaluations accessible, clear and understandable to the region's residents. C-176-001

I am pleased to see the recommended preferred alternative focuses growth in concentrated locations and protects rural and resource lands. C-176-002 I am also pleased to see policies that commit the region to addressing climate change. However, I think the proposed goal needs to be much stronger. For instance, the Seattle City Council is now considering legislation I sent to them in which we will set a goal of reducing greenhouse gas emissions to 80% below 1990 levels by the year 2050. Other jurisdictions in the region are looking to adopt similar goals. Global warming is not just a Seattle issue; it is something all governments must address. And I urge PSRC to adopt a specific and aggressive goal for reducing greenhouse emissions similar to the one I have proposed for Seattle. Setting such a goal will lead the way for formulating and taking specific actions to get us there. C-176-003

In comments Diane Sugimura, my Director of Department of Planning and Development, submitted last year on my behalf, we expressed strong support for the Metropolitan Cities Alternative. The Supplemental DEIS includes an informative chart comparing the Preferred Growth Alternative to the other alternatives. It is clear from the chart that the Preferred Alternative does not perform as well as the Metropolitan Cities Alternative for a number of key criteria, including: C-176-004

- **Impacts on climate change.** As I indicated above, this is a vital issue that I believe Vision 2040 must address, and we should give considerable weight to the alternative that will have the most positive effects on the climate. C-176-005

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C-176-001 VISION 2040 has been revised to address this issue, with stronger policies and narrative related to sustainability.

C-176-002 Thank you. Note that VISION 2040 has been revised to include stronger policies and narrative related to this issue.

C-176-003 VISION 2040 has been revised to address this issue. The Environment section narrative has a stronger focus on several topics of concern and a number of policies have added language with regard to specific comments. A policy has been added to address the state initiatives on climate change and the reduction of greenhouse gases. See climate change policies MPP-En-20 through MPP-En-25.

C-176-004 The Metropolitan Cities alternative was considered in the DEIS and rejected in favor of a hybrid of the four growth alternatives.

C-176-005 Concur.

- **Jobs/housing balance.** This criterion is a good indicator of a number of other outcomes. At a neighborhood scale, an appropriate jobs/housing balance makes it possible for more people to get to work without motorized vehicles. On a larger scale, it creates more efficiencies for providing and using transit.
- **Transit service adjacent to populations.** Transit is more likely to be used if it is within walking distance of residents, and transit use is key to addressing both congestion and climate.
- **Minimizing the conversion of rural land to urban uses.** This is a quality of life issue about preserving areas that make our region unique. But it also makes common and fiscal sense for the region to minimize the public cost of extending infrastructure and to discourage development that lengthens commutes.
- **Households within a 10-minute walk, 20-minute bike ride or 30-minute transit ride to jobs.** Again, we must find ways to increase transportation choices for current and future residents.
- **Employment locations relative to minority and low-income populations.** Vision 2040 can be a collective agreement that governments across the region will make a concerted effort to ensure that economic opportunities are available equally for all residents. I urge PSRC to review the Preferred Alternative in light of the adopted criteria, especially the ones I discuss above and to adjust the alternative so that it will produce less greenhouse gas, make non-SOV travel more attractive, and provide better access to employment for all of the region's residents.

In Ms. Sugimura's letter, she said that growth outside the metropolitan centers should be focused in areas that can be served by the region's investments in transit. I recognize that that would lead to more concentrated growth than the Preferred Alternative describes, but it is one way to meet more of the region's criteria.

It is gratifying to see that Vision 2040 is moving well beyond the current regional growth policies, and that it is moving in the right direction. However, I think this is the time to make the vision even bolder, so that we can improve the likelihood of achieving a region that grows sustainably.

Sincerely,

GREG NICKELS
Mayor of Seattle

C-176-006 — C-176-007 — C-176-008 — C-176-009 — C-176-010 — Continuation of C-176-004 — C-176-011 — Continuation of C-176-001

C-176-006 Thank you.

C-176-007 Concur. This is a key concept of VISION 2040.

C-176-008 Concur.

C-176-009 VISION 2040 has been revised to address this issue, with stronger policies and narrative related to transportation choices. Also, the Destination 2030 update will provide an additional opportunity to further address this issue.

C-176-010 VISION 2040 has addressed this issue in policies MPP-Ec-11 and MPP-Ec-12, and in T-Action-4: Regional Level – Mobility for Special Needs Populations.

C-176-004 (continued) See initial response to this comment.

C-176-011 Focusing growth in areas served by transit is a primary objective of VISION 2040.

C-176-001 (continued) See initial response to this comment.

C-110

CITY OF SUMNER
1104 Maple Street, Suite 200
Sumner, Washington 98390-1423
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David L. Enslow, Mayor
John Doan, AICP, City Administrator

September 6, 2007

Dr. Norman Abbott, SEPA Responsible Official
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104

RE: Comments on VISION 2040

Dear Dr. Abbott,

Thank you for the opportunity to comment on documents related to the VISION 2040 update. As the Puget Sound region anticipates and plans for additional growth of 1.7 million people and 1.2 million jobs it is essential that there is a regional framework to guide county and local governments in their actions.

I commend you and your staff on a thoughtfully executed public process and the quality of technical work that has been done to date on this very important update to VISION 2020.

The comments provided vary in depth from general overview to specific suggestions and questions regarding the proposed policies.

General

1. VISION 2040 presents a thoughtful regional approach to growth management. It focuses growth in urban areas, especially regional growth centers, larger cities and metropolitan cities where there are efficiencies in services, transportation and infrastructure to best serve and accommodate this growth. However, there are areas of *existing* and *ongoing* growth in areas that are not consistent with this regional approach. These areas continue to draw large amounts of population without the urban level services and transportations connections needed to adequately serve these areas. For instance, there are areas of unincorporated Pierce County that contain large expanses of urban growth area that are not affiliated with any city. ***The City strongly supports policies the direct urban growth areas to either annex into existing cities or incorporate as new cities.***

C-110-001

C-110-002

Providing needed and valued services that promote our sense of community

C-110-001 Concur.

C-110-002 Comment noted. VISION 2040 includes policies to address this issue.

2. VISION 2040 presents Multicounty Planning Policies that directly relate to facilities being developed concurrent with expected growth and consistent with State law. Even if a city or growth center is able to accomplish concurrency relating to transportation improvements, the State highway system continues to be overcapacity and underserving these areas. ***Consider including policies that emphasize the necessity for concurrency for State highways in addition to cities and growth centers. The PSRC should continue to review the entire transportation network and provide recommendations for regional transportation projects.***

C-110-003

C-110-003 No new policy was added to address concurrency for state highways.

3. **Climate Change**: Climate change is a large and very regional issue. The City of Sumner Comprehensive Plan does not contain policies directly related to climate change other then general policies pertaining to reducing emissions. ***Local governments should not be overly burdened by overarching policy related to climate change and may not have the resources, capacity or authority to adequately address these issues. Implementing the use of alternative energy sources, energy management technologies and analyzing impacts on regional water sources may be beyond the abilities of local governments unless other funding resources are made available.***

C-110-004

C-110-004 VISION 2040 has been revised to address this issue. See policies MPP-G-4 and MPP-G-5. The Implementation section states that it is appropriate for PSRC and/or the counties to assist smaller jurisdictions with addressing implementation actions.

4. **Social Equity and Environmental Justice**: The City of Sumner Comprehensive Plan does not contain policies relating to social equity and environmental justice. "*Environmental justice*" is the fair distribution of costs and benefits, based on a concern for social equity. Presidential Executive Order 12898 (1994) directs federal agencies to make environmental justice part of their missions by identifying and addressing the effects of all programs, policies, and activities on minority and low-income populations. ***VISION 2040 needs to include guidance indicating the appropriate role of local governments in addressing social equity and environmental justice policies and concerns. The level of implementation and action should be scaled to the opportunities, capacity, and administrative authority of individual jurisdictions. How are these policies to be implemented, especially in small towns with limited concentrations of minority and low-income populations?***

C-110-005

C-110-005 Comment noted. Environmental justice and social equity are the responsibility of all levels of government. VISION 2040 leaves specific implementation measures to the discretion of individual jurisdictions.

5. **PSRC's Role In Urban Growth Area Expansions**: Policy MPP-DP-6, page 39, discusses a regional framework for designating and adjusting of urban growth areas. This framework seems to imply some type of oversight and approval authority that PSRC would have on applications for expansion of UGAs which is a County prerogative. ***What does this policy mean and how will it be implemented? Will PSRC become active in UGA expansion processes at the County-level?***

C-110-006

C-110-006 The policy calls for a framework to be developed. Also see DP-Action-1.

Specific

The City of Sumner staff has reviewed the policies in detail and has the following comments:

1. The Land Use section's Goal states: "The region will conserve its natural resource land *permanently* by designating, maintaining, and enhancing farm, forest, and mineral lands." (*emphasis added*) ***Is it realistic to state that natural resource lands can be conserved***

"permanently" given the projected population and employment growth pressures projected for the region? We suggest a more qualified statement that allows some room for limited expansion of UGAs into natural resource lands as capacity is exhausted. How would this affect mining operations that have been or are planned to be "reclaimed" and are adjacent to UGA boundaries? How would this policy impact agricultural lands inside a UGA?

C-110-007 This is stated as a goal. By definition, no designated agricultural lands exist in the UGA. Land use decisions are made at the local level.

2. Both policy MPP-DP-4 and MPP-DP-5 address the need for compatibility between natural resource lands and adjacent non-resource related land uses. The underlying principal here is to not have one use impact the other. ***The Multicounty planning policies or text could provide examples of performance standards to guide local governments toward reducing impacts between these land uses.***

C-110-008 Issue best addressed at the local jurisdiction level.

3. Policy MPP-DP-12 relates to manufacturing/industrial centers and the need to focus a significant share of the employment to these areas. The plan is to prioritize funding for economic development and transportation improvements to these areas because of the high economic value and the need to move goods and people. Sumner asks that employment and truck trips be criteria for determining future manufacturing/industrial centers. In Sumner's case, along with Fife, Auburn, Puyallup and other cities with a large warehouse base, there is often less employment density then when there are more manufacturing uses. However, given the amount of freight moving from China and Asia, and projected increases in products coming overseas, warehousing is an essential link in this national system. Trade and trade related business, such as warehousing and distribution, play a dominant role in the Puget Sound economy and trucking is a major part of this business, Trucks are vital to moving goods from throughout the region and should be given weight and priority within the criteria for designating and planning for manufacturing/industrial centers. ***Truck trips need to be added to the criteria for designation of manufacturing/industrial centers rather then relying solely on employment numbers.***

C-110-009 Comment noted.

4. Policy MPP-DP-29 relates to the long-term viability of rural land by avoiding the construction of new highways and major roads in rural areas. ***How will existing capacity deficiencies be addressed that are in rural areas? An example of this is the SR162 corridor in the Sumner/Orting Valley. There are also plans for a major cross-valley highway. Would funding then not be available for these types of projects? The Multicounty planning policies should contain examples of design standards that limit access and thereby limiting potential for development in rural areas.***

C-110-010 This issue will be considered during the Destination 2030 update.

5. Policy MPP-T-25 encourages partnerships to "identify and implement personal and freight mobility improvements". ***What is meant by "personal" mobility improvements?***

C-110-011 It means the mobility of people versus "freight" which means the movement of goods. See the added narrative in the Transportation policy section.

Thank you for considering our comments and concerns. We appreciate your work in giving us all a bright future to which we can look forward. If you have questions regarding the specific comments above please contact Ryan Windish, Senior Planner at 253.299.5524 or ryanw@ci.sumner.wa.us .

Sincerely,

David Enslow
Mayor

Cc: City Council
John Doan, City Administrator
Terri Berry, City Clerk
Paul Rogerson, Community Development Director
Ryan Windish, Senior Planner

Note: This page of comments does not require a response.

C-121

City of Tacoma
Community and Economic Development Department

September 7, 2007

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Ave, Suite 500
Seattle, WA 98104-1035

Dear Mr. Abbott,

The City of Tacoma would like to commend the staff of the Puget Sound Regional Council and all those involved in the development of the Draft Vision 2040 document, for advancing a framework that reinforces the importance of regional centers as the primary focus for growth while taking the lead in addressing critical policy gaps to effectuate this growth strategy. C-121-001

We have reviewed the Draft Vision 2040 and the Supplemental Environmental Impact Statement and offer the following comments for your consideration:

- We feel positive about the 2040 population targets for Pierce County and Metropolitan Cities, but we also recognize that accommodating this growth will be a challenge on many fronts. The City views this increase in the population target as a confirmation of the growing role of Tacoma in the region as a center for work and living. However, there are several issues to consider. First, one of the assumptions underlying the growth concept is that growth should be accommodated where the infrastructure and services already exist to serve future development thereby efficiently using existing public resources to serve more people for less cost. C-121-002

  While the City agrees with this assumption, it also should be noted that much of the existing infrastructure in older cities such as Tacoma is outdated, not appropriately sized, or otherwise insufficient to serve the additional growth. The growth that we expect to accommodate within Tacoma will place a great burden on the City to upgrade or replace existing infrastructure. Local funds are lacking and there are few alternatives to meet the expected costs of providing the needed infrastructure. It is essential that PSRC continue its strong commitment to prioritizing transportation improvements within centers. PSRC could greatly assist by acting as a strong advocate for urban policies at the state and federal level that support infrastructure funding to achieve the Vision 2040 growth strategy C-121-003

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http://www.cityoftacoma.org

C-121-001 Thank you.

C-121-002 Comment noted.

C-121-003 VISION 2040 has been revised to address this issue. See fiscal policies in the General policy section.

- Local jurisdictions are being asked to take a greater role in financing infrastructure and transportation improvements. Vision 2040 includes a policy emphasis on exploring innovative financing mechanisms and techniques. While the City of Tacoma recognizes the need to seek out new financing mechanisms, further discussion between the Regional Council and its member jurisdictions should address the scale at which new techniques are most applicable to reduce the costs and risk involved in undertaking more complex financing. The PSRC could provide technical assistance to boost the capacity of local jurisdictions that may not ordinarily have the expertise to administer such programs. By working in a coordinated manner and engaging with jurisdictions across the region, we may be more likely to find reasonable solutions to the fiscal problems many cities face and put better tools in the hands of local decision-makers.

- The Pierce County employment growth target represents a significant shift from previous years to address the jobs/housing imbalance in the region. Although this is an important step in the right direction, the distribution of employment does not go far enough to bring more jobs closer to the residents of Tacoma and Pierce County. As we have brought to the Regional Council's attention previously, Tacoma's percentage of low-income population is greater than found in King County and this population is located in close proximity to our two regionally designated centers. Increasing employment in and near the populations most in need is consistent with the goals of environmental justice and reduces the transportation costs associated with the jobs/housing imbalance. To come to fruition, increasing the regional share of employment will need vigorous support from local and regional authorities and the strategic use of incentives and investments.

- The PSRC should also recognize that the economies of Pierce and Kitsap Counties are much more affected by military employment than King or Snohomish and Pierce has the highest total number of military personnel. Despite the importance of this sector to our local and regional economy, military employment garners little weight in determining the employment forecasts for the region. Though the predictability of employment in this sector is extremely problematic, the military presence has a broad multiplier effect beyond the documented "enlisted personnel" that deserves a more in-depth discussion. There are large numbers of civilian employees as well as many businesses that are directly or indirectly tied to the military. Fluctuations in military employment influence housing markets, transportation, and employment throughout Pierce County. We request that the Regional Council include a more thorough discussion of military employment in the PGA appendix or within the Vision 2040 Economic Development policies and recognize that the current forecasts for employment may be misleading due to the additional presence of military personnel.

(Comment continues on following page)

C-121-004

C-121-005

C-121-006

C-121-004 See response to C-121-003.

C-121-005 Concur. The housing policies in VISION 2040 are now a separate section in Part III: Multicounty Planning Policies. There also is a policy in the Economy section that calls for incentives and investments to create a better jobs-housing balance.

C-121-006 VISION 2040 has been revised to include more discussion regarding military sector employment and forecasting, as well as the importance of the military as an economic sector.

This additional employment should be taken into account when PSRC identifies funding priorities based upon these forecasts.

- Tacoma's success is contingent upon a strong, supportive regional and county framework and the policies of neighboring jurisdictions. The distribution of growth in Pierce County has a high percentage occurring in unincorporated areas. The City of Tacoma is concerned that this pattern of development will encourage growth in outlying areas that will compound the transportation problems within the county and create more pressure for UGA expansion. For Tacoma to be successful, the City needs supporting land use policies elsewhere that support the focus of future growth first into Metropolitan Cities to create the conditions for Tacoma's sustained redevelopment. The City of Tacoma supports the PSRC in completing the action item to develop a regional framework for determining the appropriateness of UGA boundaries and expansions and suggests that as part of this action, the PSRC assess the appropriateness of the current UGA within Pierce County.

Other issues that deserve clarification include:

- Climate change policies could use additional specificity, clarification, and scientific background as well as a clearer demarcation of local versus regional responsibility in addressing climate. Sea-level rise may be an issue of importance for Tacoma as a city with large port industrial area and should be part of the "package" of climate change policies. Planning for sea-level rise requires substantial scientific research to guide local policy. We recommend that PSRC add "sea-level rise" as a priority for further research and policy development.

- Additional discussion would be helpful on the expectations for the integration of the population and employment targets into local comprehensive plans and how Vision 2040 will be integrated with the findings of the 2007 Buildable Lands process.

- Further, PSRC should consider how to provide support to advocate for state review of GMA, SEPA, and SMA to better align state legislation and the Vision 2040 densification requirements to facilitate the full implementation of the regional growth strategy especially in designated center areas.

We appreciate the opportunity to provide comments and again commend the great work on creating this milestone document. We look forward to a more prosperous region.

Sincerely,

Ryan Petty
Director

Continuation of C-121-006

C-121-007

C-121-008

C-121-009

C-121-010

C-121-011

C-121-007 Thank you.

C-121-008 VISION 2040 has been revised to address this issue. This section has new and revised policy language to strengthen and clarify concerns about climate change.

C-121-009 Comment noted.

C-121-010 VISION 2040 has been revised to address this issue.

C-121-011 PSRC participates in a variety of statewide GMA-related activities. G-Action-4 calls for relaying the goals and objectives of VISION 2040 to state agencies and the legislature. However, the focus of this communication is on funding and investment to achieve VISION 2040.

C-129

CITY OF UNIVERSITY PLACE

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September 4, 2007

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

RE: Draft VISION 2040 / SDEIS Comments

Dear Mr. Abbott:

Thank you for the opportunity to comment on the draft VISION 2040. University Place recognizes and appreciates the effort being made to develop this document and in particular, the preferred alternative. The City does, however, have a number of concerns that it believes should be addressed prior to adoption of the strategies and policies in the plan.

Under the *Preferred Growth Alternative*, centers in "larger cities" (such as University Place) are intended to play an important and increased role over time as places that accommodate growth. As noted in the SDEIS,

> *"These areas would develop in and around traditional downtown main streets, town centers and neighborhood shopping centers, key transit stations, park and ride facilities, and other transportation and service centers. They would provide local and regional services and amenities, and would likely experience substantial redevelopment and increased activity, becoming more significant regional job centers. Many new mid- and low-rise apartments, condominiums and townhouses could also be built in these areas, although likely at lower intensities and at a reduced scale when compared to development in the larger regional growth centers in metropolitan and core cities."*

C-129-001

Population Growth

From University Place's perspective, the *Preferred Growth Alternative* as it relates to larger cities closely resembles what the City has already planned to accommodate in its *Town Center* and some additional neighborhoods. The City believes, however, that it would fall well short of meeting the population target identified in the preferred alternative even with full implementation of the *Town Center* strategies it will have in place.

It is our understanding that a countywide target setting process will determine actual population targets for each city in a county by taking into account local circumstances and objectives. Presumably, in counties with a number of "larger cities", there would be some opportunity to adjust population targets for individual cities so long as the combined numbers equal the overall target for "larger cities". However, as University Place is the only

C-129-002

(Comment continues on following page)

C-129-001 Comment noted.

C-129-002 VISION 2040 has been revised to better address the role of the Regional Growth Strategy in future rounds of growth targets at the countywide planning level.

community classified as a "larger city" in Pierce County, we are concerned that the City would be expected to accommodate the entire population target for this geography, which is an additional 23,000 people between 2000 and 2040. This represents a nearly 77% increase over the City's 2000 population of 29,933. By comparison, the latest Pierce County Buildable Lands Report (August 2007 draft) proposes a population allocation for University Place of 34,000 for the year 2022 based on available residential capacity, projected growth rates and other factors. Given the level of analysis that went into developing this county-level allocation for the City, it is difficult to comprehend how University Place will be able to reach the preferred growth strategy target established in VISION 2040.

The City's Comprehensive Plan identifies a residential capacity of 3,517 units, which supports a population increase of 7,737, assuming all undeveloped and underdeveloped land is built upon. If the City is successful in accommodating mixed use development with a much higher housing density than is currently planned for in its *Town Center* and other mixed use areas, it might be able to accommodate an additional 15,000 people for a total population of 45,000 by 2040. This would be well under the 53,000 population target identified in VISION 2040. As the city's single-family neighborhoods are largely built-out, there are few opportunities to accommodate large numbers of additional units in these areas without radically changing the character of the community – something that the community is unlikely to support.

Continuation of C-129-002

Infrastructure

If the City's policies, regulations and land base were able to accommodate an additional 23,000 people and 6,000 jobs by 2040, its transportation infrastructure would be inadequate to support this growth. VISION 2040 does not address how such needed infrastructure would be funded on a regional basis. Absent regional support in terms of transportation system upgrades, it is unlikely that University Place could begin to meet the preferred growth strategy targets for 2040.

C-129-003

DESTINATION 2030 RTP

The Draft VISION 2040 (page 65) incorporates the most recent DESTINATION 2030 RTP map. University Place believes this map and supporting documentation should be amended at the earliest opportunity to include a high capacity transit spur extending to the City's *Town Center*. A light rail extension along the Bridgeport Way corridor would greatly assist the City in realizing its goal of developing a town center in a manner consistent with VISION 2040's description of "larger cities". Light rail would support higher housing density and greater economic activity in *Town Center*, per VISION 2040. The City believes the addition of high capacity transit would make a crucial difference in the City's ability to meet the employment targets identified in the *Preferred Growth Alternative.*

C-129-004

Sincerely,

The City of University Place

Mayor Gerald Gehring

C: Council
City Manager
Development Services Director

C-129-003 Comment noted.

C-129-004 The issue of high-capacity transit service will be considered during the Destination 2030 update.

C-140

September 7, 2007

Norman Abbott
State Environmental Policy Act Responsible Official
Puget Sound Regional Council
1011 Western Ave, Suite 500
Seattle, WA 98105-1035

Dear Mr. Abbott:

Thank you for the opportunity to provide comments on the Puget Sound Regional Council Draft Vision 2040. I believe that the overall strategy presented in the Draft Vision is on the right track for moving this region forward toward a more sustainable future. I have asked several King County departments to provide me with their perspective on the Draft Vision. This letter is a compilation of those comments.

1. Vision Statement
The vision statement that introduces the document should include a reference to public health and also to climate change. We suggest that the statement be modified as follows:

> *Our vision is for a future that advances the ideals of our people, our prosperity, and our planet. As we work toward achieving the region's vision we must protect the environment, support and create vibrant, ((~~and~~)) livable, and healthy communities, offer economic opportunities for all, provide safe and efficient mobility, and use our resources wisely and efficiently. Land use, economic, and transportation decisions will be integrated in a manner that supports the natural environment, improves public health, reduces the effects of climate change, achieves social equity, and is attentive to the needs of future generations.*

Further, the vision statement should be expanded to include a narrative describing the Puget Sound region in 2040 if these measures are adopted. What does the future look like? We see a region where the cities are vibrant and energizing places, where Puget Sound is clean, where we have options for getting around – be it on a bus, bicycle, a train, or walking – and where much of our food is produced on our own farms. The future is one that is sustainable and equitable. We encourage you to paint a picture of Puget Sound in 2040 so that we can all understand where we are headed.

C-140-001

C-140-002

C-140-001 The vision statement was not rewritten specifically as per the request. However, changes have been made to the vision statement based on the ideas presented.

C-140-002 VISION 2040 has been revised to address this issue, with all the goal statements included in the vision statement section.

2. Environmental Framework
The current Environmental Framework is presented more as an introduction to the Environment Chapter than as a foundation piece for the document. We feel that this is an opportunity to talk about sustainability as the foundation for the vision and to weave together many of the overriding themes such as climate change, public health, and the natural environment. We recommend that you revise this section to really provide the context for the policies and actions to follow. We would like to see this section renamed as either "Sustainable Framework" or "Toward a Sustainable Region."

Add a reference to public health to the section in italics:
The communities of the central Puget Sound region are connected by ecosystems, culture, transportation systems, and the economy. The way land is developed affects air and water quality, public health, the character of communities, and the cost of roads and utilities. The region's economic health is dependent on its ability to get goods to market and people to their jobs. The ability to support neighborhoods, increase the health of all residents, and provide cultural and recreational amenities depends on the fiscal health of the region's communities.

3. Regional Strategy for Accommodating Growth
We support the Regional Strategy but we also believe it could be even stronger. We are especially concerned with the total increase of population growth going into the rural area – seven percent is just too high if we are going to prevent sprawl and reduce pressures on the rural area and agriculture and forestry lands.

4. Multicounty Planning Policies

a. Approach

Page 24, paragraph 3: Those updating these policies have kept in mind the commitment in the VISION statement "to protect the environment, to create vibrant, ((~~and~~)) livable, and healthy communities, to offer economic opportunities for all, to provide for safe and efficient mobility, and to use the region's resources wisely and efficiently.""

b. Environment

Page 27, Overarching Goal: *The region will care for the natural environment by protecting and restoring natural systems, conserving habitat, improving water quality, reducing greenhouse gas emissions and air pollutants, and preparing for climate change impacts. The region acknowledges that the health of all residents is inextricably connected to the health of the environment, and therefore ((~~P~~)) planning at all levels should consider the impacts of land use, development patterns and transportation on the regional ecosystem.*

Page 27, paragraph 3: Climate change will probably create severe pressure for the already stressed Puget Sound salmon population by affecting its physical environment, including the availability of food. The agency's

(Comment continues on following page)

C-140-003
C-140-004
C-140-005
C-140-006
C-140-007
C-140-008
C-140-009

C-140-003 VISION 2040 has been revised to address this issue. For instance, the concept of sustainability is now woven throughout VISION 2040 as an important thread that ties together the environment, land use, transportation, and the economy as interrelated components that shape our quality of life. The word "sustainability" is now included in the title of the Environmental Framework.

C-140-004 VISION 2040 has been revised to address this issue.

C-140-005 VISION 2040 has been revised to include the concepts included in this request. The addition of public health as a factor has been inserted in both narrative discussions and the policies.

C-140-006 Comment noted.

C-140-007 VISION 2040 has been revised to address this issue. The concern for public health is now included in the narrative discussion.

C-140-008 VISION 2040 has been revised to address this issue, and the overarching goal has been rewritten.

C-140-009 VISION 2040 has been revised to address this issue. The narrative in the Environment section has been rewritten to include a reference to the relationship between climate change and public health.

research suggests that as the region's average temperatures continue to rise, warmer summer weather, accompanied by reduced runoff in spring could increase drought and the risk of forest fires((~~, impacting air pollution and human health. A hotter climate could also lead to more noxious pest infections and damage the food chain~~)). All of these environmental changes in turn will affect public health in some way. These effects range from displacing coastal and shoreline residents and businesses to increased incidence of temperature-related illness and disease to a changing food supply.

Continuation of C-140-009

Page 29, En-3: Maintain and, where possible, improve air quality, ((~~and~~)) water quality and quantity, soils, and natural systems to ensure the health and wellbeing of people, animals, and plants. Reduce the impacts of transportation on air quality and climate change. Implement more efficient uses of such resources as energy and water.

C-140-010

C-140-010 VISION 2040 has been revised to address this issue. What is now MPP-En-3 in the final document includes a reference to water quality.

Page 31: This section, Water Quality, should include more references to how water quality cannot be considered as mutually exclusive from water quantity. I understand that water quantity is discussed more fully on page 76, in the Public Facilities section, but these two sections need to have better cross-references.

C-140-011

C-140-011 VISION 2040 has been revised to address this issue.

Page 31, paragraph2: ,,,and the giant Pacific octopus. In most watersheds in the Puget Sound, low instream flows have been identified as limiting factors to the recovery of fish species listed under the Endangered Species Act. The region has developed a Puget Sound Chinook salmon recovery plan that has been approved by all local governments, which includes adaptive management strategies to address such gaps in the plan as assuring sufficient flows for fish.

C-140-012

C-140-012 VISION 2040 has been revised to address this issue.

Page 31, sidebar on the Puget Sound Partnership: We suggest that this sidebar be expanded substantially to recognize the importance of Puget Sound to this region.

C-140-013

C-140-013 VISION 2040 now includes an up-to-date discussion on the objectives of cleaning up Puget Sound and how that intersects with the regional vision.

Page 32, Goal: ((~~The region should meet or exceed standards for water quality. The quality of the water flowing out of the region—including Puget Sound—should be as good as or better than the water quality entering the region.~~)) The region will maintain and safeguard water quality and quantity that support human uses, human health and intact diverse biological systems.

C-140-014

C-140-014 This idea was considered in the VISION 2040 process and the language was kept as written.

Page 32, En-14: Maintain natural hydrological functions within the region's ecosystems and watersheds and where feasible, restore them to a more natural state that supports healthy and diverse biological systems. Efficiently manage the region's water resources by implementing best water use efficiency practices, and reclaiming, recycling, and reusing water wherever possible.

C-140-015

C-140-015 VISION 2040 has addressed this issue. See the Public Services section.

Page 32, En-15: Restore - where appropriate and possible - the region's freshwater and marine shorelines, watersheds, and estuaries to a natural condition for ecological function and value. Critical shorelines, watershed areas and estuaries that are still intact should be protected.

C-140-016

C-140-016 VISION 2040 has addressed this issue. See the new action that addresses estuary restoration.

Page 32, En-15: Restore - where appropriate and possible - the region's freshwater and marine shorelines, watersheds, and estuaries to a natural condition for ecological function and value. Critical shorelines, watershed areas and estuaries that are still intact should be protected.

Page 32, En-16: Reduce the use of pesticides and chemical fertilizers to the extent feasible and identify alternatives to pesticides and fertilizers that minimize risks to human health and biological resources.

C-140-017

C-140-017 VISION 2040 has been revised to address this issue. The policy includes the requested edit.

Page 32, paragraph 1: Air quality is primarily a public concern, ((~~although aire quality can affect plant animal life as well a visibility~~)) because air pollutants can damage lung tissue and eventually lead to impaired breathing and other types of illness and disease. Health concerns were the original impetus underlying the Clean Air Act. In particular, sensitive populations, which include children, the elderly, and those with certain health conditions are considered most at risk for developing diminished health due to exposure to air pollutants. Environmental and health experts are increasingly concerned that a broad range of air toxics in air may contribute to cancer and cardiovascular disease. Historically, ground-level ozone, carbon monoxide, and fugitive dust have been the pollutants of primary concern. Currently – and for the future – our region's most problematic pollutants are fine particles, toxic emissions, and ground-level ozone.

C-140-018

C-140-018 VISION 2040 has been revised to address this issue.

((~~Impaired visibility and climate change concerns compound the problems related to air quality.~~)) Climate change compounds air quality-related health concerns. For example, where climate change leads to increased temperatures, ground-level ozone, a precursor for asthma, is expected to increase. There are also aesthetic reasons to have clean air in the region. When the air is dirty some of the best known and most scenic vistas, such as the Olympic and Cascade mountain ranges and Mt. Rainier, are obscured. Environmental and health experts are increasingly concerned that a broad range of air toxics may contribute to cancer and cardiovascular disease.

C-140-019

C-140-019 VISION 2040 has been revised to address this issue.

Page 33: The introductory couple of paragraphs to climate change do not draw a clear distinction between mitigation and adaptation measures. Mitigation is critical for lessening the impacts of climate change while adaptation is necessary for dealing the inevitable effects climate change will bring to the region. The text should be enhanced with a more complete description of goals and actions.

C-140-020

C-140-020 VISION 2040 has been revised to address this issue. The Environment section narrative has a stronger focus on several topics of concern and language has been added with regard to specific comments. A policy has been added to address the state initiatives on climate change and the reduction of greenhouse gases.

Page 33, Goal: The region will reduce its overall production of harmful elements that contribute to climate change, and will accelerate understanding and planning for adaptation to the alterations anticipated by climate change.

C-140-021

C-140-021 VISION 2040 has been revised to address this issue. While the goal was not changed, the Environment section narrative has a stronger focus on several topics of concern. A policy has been added to address the state initiatives on climate change and the reduction of greenhouse gases (MPP-En-20).

Page 33, En-19: Continue efforts to reduce pollutants from the transportation and land use sectors, including through the use of alternative fuels and vehicles and increasing alternatives to driving alone, ((~~as well as design and land use~~)) and developing communities that encourage non-motorized travel.

Page 34, En-20: Reduce the rate of energy consumption use per capital, both in building use and in transportation, even as the region grows. Reduce the rate of water consumption use per capita, even as the region's population increases.

Page 34: En-22: Reduce greenhouse gases by expanding the use of conservation and alternative energy sources. Expand water conservation and the use of alternative sources of water, such as reclaimed water.

Page 34: Add two new En policies: (1) Reduce carbon emissions by 80 percent over 2000 levels by 2050 while simultaneously preparing the region for the impacts of global climate change by employing adaptation strategies.

(2) In developing climate change adaptation and mitigation strategies, strive for actions that can deliver multiple benefits in the areas of sustainability, public health, and economic opportunity.

c. Development Patterns

Page 35, Overarching Goal: *The region will ((~~have~~)) focus((~~ed~~)) growth within already urbanized areas to create healthy places for people through developing compact, transit-oriented and , pedestrian-oriented communities ((~~while maintaining~~)) that maintain unique local character. Centers will continue to be a focus of development. Vital parts of the region will continue to be permanent rural ((~~lands~~)) areas and natural resource lands. All citizens of the region will have safe, healthy, and affordable housing.*

Page 35, paragraph 1: …Development patterns of the last half of the 20th century often separated people from jobs, overly focused on accommodating the automobile, and altered critical ecosystems. Some of the results have been sprawl development, worsening public health in the form of increased prevalence of obesity and related chronic diseases, overburdened transportation and infrastructure systems, and increased pollution. The loss of land cover and vegetation to impervious surfaces, including buildings and pavement, also contributes to climate change – although not as significantly as the burning of fossil fuels…

Page 36, paragraph 4: In Washington, resource lands include forest, agricultural, and mineral lands. These lands serve resource-based industries and are the local source for food, wood products, sand, gravel and other minerals crucial to the growth, economy and sustainability of the region. These lands also provide an environment for wildlife habitat, open space and

(Comment continues on following page)

C-140-022 C-140-023 C-140-024 C-140-025 C-140-026 C-140-027 C-140-028 C-140-029

C-140-022 VISION 2040 has addressed this issue.

C-140-023 This idea was considered during the update process but the language was kept as written. However, revisions were made to the water policies in the Public Services section.

C-140-024 VISION 2040 has been revised to address this issue.

C-140-025 This idea was considered in the VISION 2040 process and a policy was added to address RCW 80.80.020. See the new policy MPP-En-20.

C-140-026 This idea was considered in the VISION 2040 process and the language was kept as written.

C-140-027 VISION 2040 has been revised to address this issue.

C-140-028 VISION 2040 has been revised to address this issue.

C-140-029 VISION 2040 has been revised to address this issue.

groundwater recharge. ((~~They also serve resource based industries, including timber harvesting and farming.~~))

Page 36, paragraph 6: Research by the Puget Sound Clean Air Agency and others has shown that in western Washington, forest ecosystems are in danger of becoming severely stressed by a combination of climate-triggered heat and insect damage, public overuse, ((~~and~~)) fire susceptibility, and lack of active management. Forested lands adjacent to urbanized areas can be subjected to economic pressures to convert to suburban-type uses. The fragmentation and loss of the extensive forest land base in the region could be devastating to the environment and the economy. Addressing the threats to these forests will require a cooperative regional effort.

Page 36, paragraph 7: The agricultural land in the central Puget Sound region is among the most productive in the state. The loss of good quality farmland ((~~to urban development~~)) in the region has implications for air quality, water quality and quantity, and our region's self-sufficiency. When the region loses farmland, its residents must rely on food from more distant locations.

The threats to the continued productivity of the region's farmland include urban development, incompatible adjacent uses, the loss of support infrastructure, and demands on the land for other uses. Climate change may exacerbate problems such as flooding and lack of water for irrigation.

Page 36, text box at bottom of page: King County has over 42,000 ((~~nearly 55,000~~)) acres in its Agriculture Production Districts, including 13,200 acres protected in the ((~~and~~)) Farmland Preservation Program. The latter…

Page 37, DP-3: Support the economic sustainability of designated resource lands.

Page 37, DP-5: ((~~Ensure that resource lands do not adversely impact adjacent lands.~~)) Work cooperatively across the region to address the obstacles to the continued productivity of agriculture and forest lands.

Page 37, add new DP policy: Support the development of regional agricultural processing facilities to sustain local food systems operating in the region.

Page 37: We suggest that you add a sidebar box on the food systems, especially as it pertains to local agriculture, similar to the sidebar box on page 52.

Page 47: We support policies DP-26 and 27 that call for regional notification of any proposed fully contained communities.

Continuation of C-140-029
C-140-030
C-140-031
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C-140-035
C-140-036
C-140-037

C-140-030 VISION 2040 has been revised to address this issue.

C-140-031 VISION 2040 has been revised to address this issue.

C-140-032 VISION 2040 has been revised to address this issue.

C-140-033 This idea was considered in the VISION process and the policy was kept as written.

C-140-034 VISION 2040 has been revised to address this issue. The first policy now references adjacent lands, and the second policy was deleted.

C-140-035 VISION 2040 has addressed this issue in the narrative discussion.

C-140-036 VISION 2040 has revised the narrative discussion to address this issue.

C-140-037 These policies were retained.

Page 48, paragraph 1: Housing is a basic need for every individual in the region and the foundation of good health, prosperity, and cohesive, safe communities. As we consider the opportunities and challenges that come with growth and new development, we must be attentive to how we accommodate the housing needs of the region's population while protecting our environment, supporting our economy, and enhancing our communities. Our success depends on ensuring the availability of a variety of housing types and densities, as well as an adequate supply of housing at all ((~~affordability~~)) income levels, to meet the diverse needs of our current and future residents.

Page 51, DP-34: Encourage inter-jurisdictional cooperative efforts and public-private partnerships to advance the provision of affordable units ((~~and~~)), special needs housing, and housing with universal design.

Page 51, DP-35: Expand the supply and range of housing, including affordable units, and units consistent with universal design standards, in centers throughout the region.

Page 52: We recommend that this section be renamed to reflect the emerging issues and new content of this section. We suggest Designing Healthy and Sustainable Communities.

Page 52, paragraph 1: The Growth Management Act (GMA) advances "orderly development" as a way to ensure that growth is a contiguous and can be served as efficiently as possible. Since the inception of the GMA, much has been learned about the connections between public health and planning. Well planned development ((~~goes a long way toward protecting~~)) that protects open space and farmland, ((~~revitalizing~~)) revitalizes communities, ((~~keeping~~)) keeps housing affordable, and ((~~improving~~)) improves mobility and transportation choices serve both public health and planning goals. A more orderly approach to development focuses on the long-term implications of growth and how it may affect the community instead of viewing growth simply as an end in itself. It takes into account efficiencies, cost-effectiveness, and the many facets of the built environment that contribute to public health and a high quality of life.

Page 52, paragraphs 1, 2, and 3, replace with:
The built environment impacts our health because of how we live and how we get around. The built environment refers to physical elements of our surroundings – buildings, streets, neighborhoods, parks, roadways, entire metropolitan, etc. Recent public health and planning research has identified many health implications of the built environment. Among the findings are that the obesity epidemic is linked, in part, to both community design and food choices. In far too many cases the research is showing that the design of communities poses disincentives and barriers for people to engage everyday activities that that are known to prevent certain life-shortening chronic diseases. For example, we know that separation of different land

(Comment continues on following page)

C-140-038

C-140-039

C-140-040

C-140-041

C-140-042

C-140-043

C-140-044

C-140-038 VISION 2040 has been revised to address this issue. The housing policies in VISION 2040 are now a separate section in Part III: Multicounty Planning Policies.

C-140-039 VISION 2040 has been revised to address this issue.

C-140-040 VISION 2040 has been revised to address this issue. The narrative now includes more discussion regarding special needs housing and universal design.

C-140-041 VISION 2040 has been revised to address this issue. This concept is noted in the narrative discussion.

C-140-042 VISION 2040 has been revised to address this issue. The name of this section is now "Elements of Orderly Development and Design."

C-140-043 VISION 2040 has been revised to address this issue in the narrative discussion.

C-140-044 VISION 2040 has addressed this issue in the narrative discussion.

uses, long distances between home and work, school, and stores mean we spend more time driving and less time walking or bicycling. Accompanying characteristics of this development pattern include communities that have few sidewalks, unsafe or non-existent cycling routes, and few efficient transit options.

Obesity and overweight are of concern because they are precursors to a wide range of chronic diseases and health conditions leading to premature death. Among these are hypertension, Type 2 diabetes, coronary heart disease, stroke, gallbladder disease, osteoarthritis, sleep apnea, respiratory problems and some cancers. Not only do these conditions shorten life, they diminish the quality of life among both adult and adolescent populations. Much of the increase in rising obesity rates could be curtailed through designing, building, and maintaining our communities in ways that make physical activity and healthy eating easy, everyday choices. For instance, communities that are more compact and feature a mix of land uses, are connected by pedestrian and bicycle facilities and transit, allow less driving, and are more conductive to physical activity as part of one's everyday routine.

The built environment and the land use decisions that underlie community design and transportation affect health in other major ways too. Some of these are: the relationship between street design and the frequency and severity of automobile crashes that result in disability or early death; differing exposures to air pollutants that affect respiratory health, including asthma; a level of community cohesiveness that can lead to either positive or negative social and mental health. Finally, certain populations bear a disproportionate burden of sickness and disease because of planning decisions that result in built and natural environments that neither create nor sustain the conditions necessary for good health. These multiple conditions, which can include factors such as lack of safe housing, retail and commercial businesses offering an abundance of unhealthy food choices, incomplete street infrastructure, and lack of green space for exercise and enjoyment exemplify the multitude of ways that the built environment affects population health.

Re-integrating public health and planning is a way to ensure a better quality of life and the sustainability of communities in the region. When we begin to couple planning and land use decisions with what we know about the conditions that generate good public health, we will have achieved a major common goal—making places and communities that are good for people and the live, work, and play environments on which they depend.

Continuation of C-140-044

d. Economy – We have no comments on this section.

C-140-045

e. Transportation

C-140-046

We suggest that this section make a stronger connection linking land use with transportation and focus on providing the region with multiple options for

(Comment continues on following page)

Response to Comment Letter

C-140-045 Comment noted.

C-140-046 VISION 2040 has been revised to address this issue and contains stronger policies and narrative in the transportation system. The Transportation section now has a subsection entitled "Sustainable Transportation" that includes policies that address transportation and the effects of emissions. In addition, MPP-T-9 and MPP-T-10 call for regional coordination with regard to multimodal systems and land use patterns.

transportation into the future. Capital investments should be focused in the urban areas and investments in public transportation, walking, and bicycling need to be prioritized. Further, we would like to see an expanded section devoted to congestion pricing priorities and its importance to the region's future mobility.

Page 63, Overarching Goal: *The region will have a safe, integrated, sustainable, and highly efficient multimodal transportation system that supports the regional growth strategy ((~~and~~)), promotes economic and environmental vitality, and improves public health.*

Page 67, T-3: Reduce the need for new capital improvements through investments in operations, pricing infrastructure programs, demand management strategies, and system management activities that improve efficiency of the current system.

Page 68, T-8: Promote coordination between transportation providers, ((~~and~~)) local governments, and developers to ensure that joint and mixed use developments are designed in a way that ((~~improves~~)) enhances overall mobility and accessibility to and within such development, and improves public health, and reduces greenhouse gas emissions.

Page 67: We suggest that this section be renamed to add sustainability, perhaps "Supporting the Growth Strategy and Promoting Sustainability." We would like to the text to discuss developing a sustainable transportation system to support the region into the future. We would like you to consider revising and then moving Policy T-17 up to the front of the section to better emphasize the attention to a sustainable transportation system. Upon further review of this section, it might make sense to break this up into several smaller sections so that each topic area could be highlighted, such as transportation and the natural environment, multi-modal transportation, transportation and public health, and transportation and climate change.

Page 68, Goal: *The future transportation system will support the regional growth strategy and promote a sustainable transportation system, focusing on connecting centers with a highly efficient multimodal transportation network.*

Page 68, T-17: ((~~Deploy~~)) Employ sustainable transportation strategies that reduce pollutants, conserve energy, promote safety and ((~~wellness~~)) public health, and protect the climate and the natural environment.

Page 68, add 2 new T policies (1) Encourage increased transit market share and establish mode split goals.

(2) Support unified and regional ferry service.

Continuation of C-140-046
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C-140-058

C-140-047 VISION 2040 has been revised to address this issue. These policies are now included in a subsection entitled "Greater Options and Mobility" to expand alternatives, improvements, and financing methods.

C-140-048 VISION 2040 has been revised to address this issue. The overarching transportation goal now includes the clause "and contribute to better public health."

C-140-049 This idea was considered in the VISION 2040 process and the language was kept as written.

C-140-050 The Transportation section now has a subsection entitled "Sustainable Transportation" that includes four policies (MPP-T-5 through MPP-T-8) that address transportation and the effects of emissions. MPP-T-7 is a new policy that states: "Develop a transportation system that minimizes negative impacts to human health." In addition, MPP-T-9 and MPP-T-10 call for regional coordination with regard to multimodal systems and land use patterns.

C-140-051 The Transportation section now has a subsection entitled "Sustainable Transportation" that includes four policies.

C-140-052 VISION 2040 has been revised to address this issue, with stronger policies and narrative related to transportation and sustainability.

C-140-053 VISION 2040 has been revised to address this issue.

C-140-054 VISION 2040 has been revised to address this issue.

C-140-055 While this goal has not changed, the Transportation section now has a subsection entitled "Sustainable Transportation" that includes four policies.

C-140-056 The policy has been broken into component parts, as has the subsection. The word "deploy" no longer appears.

C-140-057 VISION 2040 has been revised to address this issue, with discussion of mode split goals for centers.

C-140-058 VISION 2040 has an action that calls for development of a regional ferry plan. Destination 2030 will address ferry service in more detail.

Page 71, T-21: Expand capacity of the transportation system to move goods and people to and within urban growth areas and expand key facilities between urban areas connecting the region to national …

Page 71, T-22: *We recommend that this language be consistent with policy DP-29 and that. T-22 be replaced with:* Maintain the long-term viability of permanent rural land by avoiding the construction of new highways and major roads in the rural areas.

Page 71, T-24: Target transportation investments into areas that have or are planning for transit-supportive densities and land uses within the urban areas.

f. Public Services

Page 73, paragraph 4, add the following sentence at the end: Investments in infrastructure must also take into account the changed conditions and challenges that climate change will bring.

Page 77, paragraph 1: Improved coordination in water supply planning will help the region better accommodate growth by (1) taking steps to ensure we have reliable long-term water supplies, ((~~and~~)) (2) managing water demand, and (3) increasing water use efficiency. Key steps include coordinating regional planning, improving conservation and supply management and acquiring, constructing, maintaining, and managing essential water supply infrastructure. Water utility providers could potentially meet increased demand through strategies such as additional conservation, reclaimed water and reuse options, surface and groundwater storage and release, and interties and sharing supplies.

Page 77, PS-8: Promote improved conservation, better water use efficiency, and the increased use of reclaimed water to reduce wastewater generation and provide increased water reliability.

Page 77, PS-17: Promote coordination among local governments, tribal governments, water providers and suppliers to meet long-term water needs in the region in a manner that supports the region's growth strategy and commitment to environmental protection.

Page 77, PS-18: Reduce the per capita rate of water consumption through conservation, water use efficiency, reclaimed water, and reuse.

5. Appendix 1 – Vision 2040 Actions

Page A-1-2, Environmental Planning: *This action item needs to be more explicit and directive.* The Puget Sound Regional Council will ((~~determine~~)) establish a new Environmental board or subcommittee of an existing board to strengthen its ongoing role in regional environmental planning and coordination, including addressing the Impacts of climate change.

C-140-059

C-140-060

C-140-061

C-140-062

C-140-063

C-140-064

C-140-065

C-140-066

C-140-067

C-140-059 VISION 2040 has been revised to address this issue.

C-140-060 This policy is now clearer about the conditions under which new or expanded roads in rural areas or resource lands are appropriate.

C-140-061 VISION 2040 has been revised to address this issue.

C-140-062 VISION 2040 has been revised to address this issue.

C-140-063 VISION 2040 has been revised to address this issue in the narrative discussion.

C-140-064 VISION 2040 has been revised to address this issue.

C-140-065 VISION 2040 has been revised to address this issue.

C-140-066 VISION 2040 has been revised to address this issue.

C-140-067 VISION 2040 has been revised to address this issue. An action has been modified to direct the Growth Management Policy Board to oversee work on environment and sustainability.

Page A-1-2, Climate Change: *Consistent with the new policy suggested on page 34, above.* The Puget Sound Regional Council and its member organizations will work with the Puget Sound Clean Air Agency, state agencies, and other environmental professionals to prepare an action plan containing regional and local provisions on how the region will attain an 80 percent reduction in carbon emissions over 2000 levels. The plan …

C-140-068

Page A-1-7: The following action items should be added to the Transportation section:

- Establishing mode-split goals, especially for centers.
- Pursuing funding for increasing density around transit centers and high capacity transit routes.
- Pursuing new technologies for enhanced transportation system performance.
- Pursuing funding sources for congestion pricing implementation.

C-140-069

If you have further questions about the recommendations presented in this letter, please contact Karen Wolf, Senior Executive Policy Advisor, at 206-296-3423. Thank you for your consideration.

Sincerely,

Ron Sims
King County Executive

cc: Kurt Triplett, Chief of Staff, Office of the King County Executive (OKCE)
Stephanie Warden, Director, Department of Development and Environmental Services
Harold Taniguchi, Director, Department of Transportation
Theresa Jennings, Director, Department of Natural Resources and Parks
Dr. David Fleming, Director and Public Health Officer, Public Health – Seattle & King County
Karen Wolf, Sr. Executive Policy Advisor, OKCE

C-140-068 VISION 2040 has been revised to address this issue.

C-140-069 VISION 2040 has been revised to address the first item. The Destination 2030 update will address the others.

KITSAP COUNTY DEPARTMENT OF COMMUNITY DEVELOPMENT
614 DIVISION STREET MS-36, PORT ORCHARD WASHINGTON 98366-4682 Larry Keeton, Director
(360) 337-7181 FAX (360) 337-4925 HOME PAGE - www.kitsapgov.com/dcd/

C-165

September 7, 2007

Mr. Norm Abbott
Puget Sound Regional Council
1011 Western Ave, Suite 500
Seattle WA 98104-1035

Re: Kitsap County comments on Vision 2040 and Multi-County Planning Policies

Dear Mr. Abbott,

Thank you for the opportunity to submit comments for consideration during development of the final draft of Vision 2040 and for the SDEIS.

Enclosed please find comments submitted on behalf of Kitsap County.

If you have questions or would like more information on these comments, please contact Jim Bolger, at jbolger@co.kitsap.wa.us or (360) 337-7165.

We look forward to seeing the final document.

Sincerely,

Larry Keeton
Director

CC: Steve Bauer, Commissioner, District 1
Jan Angel, Commissioner, District 2
Josh Brown, Commissioner, District 3
Jim Bolger, DCD
Greg Cioc, Public Works

Enclosure

TOLL FREE FROM: BAINBRIDGE IS. 842-2061 • OLALLA 851-4147

Note: This page of comments does not require a response.

Kitsap County Comments:

Puget Sound Regional Council Draft VISION 2040

Section	Page*	Comment
General	N/A	Increase the font size; document is very difficult to read.
General	N/A	Multi-County Planning Policies are not required for counties with less than 450,000 population (Kitsap: 239,000) per RCW 36.70A.210 Section 7. *(Section 7) Multicounty planning policies shall be adopted by two or more counties, each with a population of four hundred fifty thousand or more, with contiguous urban areas and may be adopted by other counties, according to the process established under this section or other processes agreed to among the counties and cities within the affected counties throughout the multicounty region. (emphasis added)*
General	All	Revised document should CLEARLY indicate when prior goals or policies from original document have been renumbered, removed, altered, or otherwise revised from original MPP document. (example: Policies MPP-PS -12, MPP-PS-13, & MPP-PS-14 were once MPP-PS-17, MPP-PS-18, & MPP-PS-19)
General	43	Draft Multi-County Planning Policies, Page 43: Policies MPP-DP-12, MPP-DP-13, MPP-DP-14 are out of order with policies MPP-DP-14, MPP-DP-16, & MPP-DP-17
Policy MPP-A-2	25	December 31, 2010 deadline for update of countywide CPPs is consistent with Kitsap County five year update (2009) commitment for countywide CPP update noted in KC Ordinance 327-2004.
MPP-En-13	30	Would propose addition to "Identify and Address the impacts of climate change on the regions' hydrological systems". Addition would include "Seek federal, state, and regional funding to identify and address …" Without the addition, this may be construed as an unfunded mandate.
MPP-En-20	34	'Reduce the rate of energy consumption use per capita, both in building use and in transportation~~, even as the region grows~~.' *Per capita* improvements are independent of growth.
MPP-En-21	34	'…development of energy management technologyies as part…"
MPP-En-24	34	Would propose addition to "Anticipate and Address the impacts of climate change on the regional water sources". Addition would include "Seek federal, state, and regional funding to anticipate and address…" Without the addition, this may be construed as an unfunded mandate.
General	34	Propose adding a section, as in the **PUBLIC SERVICES** section, which addresses fiscal challenges and opportunities re: the environment. Section could include similar policies such as: **MPP-En-xx** Explore new and existing sources of funding for services and infrastructure related to natural resource planning, conservation and restoration, recognizing that such funding is vital if local governments are to achieve the regional vision.

C-165-001 C-165-002 C-165-003 C-165-004 C-165-005 C-165-006 C-165-007 C-165-008 C-165-009 C-165-010 C-165-011

C-165-001 Comment noted.

C-165-002 Kitsap County has been a member of PSRC and its predecessor agencies since the 1950s. The RCW cited states that other counties may adopt multicounty planning policies, which Kitsap County does as a member of PSRC.

C-165-003 This comparison was made during the initial stages of review and development of draft policies by the Growth Management Policy Board. It is possible to review the materials including tables and other information that show which policies the board kept, the ones the board revised, and the new policies the board included in what became draft VISION 2040.

C-165-004 VISION 2040 has been revised to address this issue.

C-165-005 Comment noted.

C-165-006 All fiscal issues are in the General policy section under the subheading "Fiscal Opportunities and Challenges." Furthermore, the General policy section includes an expanded discussion of fiscal issues.

C-165-007 This policy has been revised to include this edit. The phrase "even as the region grows" has been deleted.

C-165-008 This issue was considered but the existing language was retained.

C-165-009 See response to C-165-006.

C-165-010 VISION 2040 has addressed this issue.

C-165-011 Although a new policy was not added, the narrative on fiscal opportunities was revised to address this issue.

Kitsap County Comments:
Draft Vision 2040

Section	Page*	Comment
MPP-DP-7	39	Multi-county (King, Snohomish, Pierce) population/housing/employment targeting methodology may not necessarily be consistent nor applicable to Kitsap jurisdictions agreed methodology and may have unforeseen or implementation impacts upon Kitsap County and Municipal Comprehensive Plan Goals, Policies, and Methodologies.
MPP-DP-23	45	Propose adding additional effort… '…including efforts such as: a) establishing urban development standards, b) addressing service and infrastructure financing, c) developing annexation plans, and ed) transferring permitting authority.'
MPP-DP-26	46	Propose deletion of Policy MPP-DP-26, the prohibition of Fully Contained Community (FCC) outside existing Urban Growth Areas, as by definition and compliance with RCW 36.070A.350, it would not contribute to sprawl nor undermine GMA goals.
MPP-DP-27	46	Propose deletion of Policy MPP-DP-27, the Fully Contained Community (FCC) multi-county review policy, as the host County is the approval authority and the Central Puget Sound Growth Hearings Board is the appropriate oversight body for review. At minimum, change "shall make the proposal available" to "may make the proposal available".
General	63	2nd Paragraph – Add the following language to: 'that more detailed planning and investment strategies in the *Metropolitan Transportation Plan* **which can be utilized in local plans and growth strategies.**'
General	63	4th Paragraph – The significance that 1/3 of the population doesn't drive is unclear. That statistic includes children under 16, which is a significant portion of the population? What percent of eligible drivers choose not to drive?
General	64	1st Paragraph – the sentence that reads 'That plan identifies priorities and action steps for the region's ….' seems to be a bit run on or circuitous.
General	64	4th Paragraph – Define '**user-oriented**' balanced transportation system.
General	66	Title '**Maintenance, Management…**' is reversed from previous page 'Management, Maintenance …
General	66	3rd Paragraph – and 'reduce the length of some trips'. Should read in terms of time; length implies distance.
MPP-T-6	67	Discusses mobility for special needs. The goal focuses on safe and usable state of the transportation network. Consider moving this policy to the third goal of offering greater options, mobility etc.
Goal	68	Define or change the words 'highly efficient'.
General	70	Typo in 1st Paragraph – 6th line – bicycle 'lands'??
MPP-T-22	71	Propose change of "Do not increase roadway capacity through rural areas, unless…" to "Discourage increasing roadway capacity through rural areas, unless…" The independent county jurisdiction 6 year TIP and independent 10 Year Update Capital Facilities Plan is the correct tool for implementing and evaluating capacity issues. This wording assumes the existing rural roadway capacity is correctly sized for the current land use and / or transportation demand trends.

C-165-012 Comment noted.

C-165-013 Issue best addressed at the local jurisdiction level.

C-165-014 The existing language regarding fully contained communities was retained.

C-165-015 See response to C-165-014.

C-165-016 VISION 2040 addresses this issue.

C-165-017 The existing language was retained.

C-165-018 VISION 2040 has fixed this grammatical error.

C-165-019 The definition has been added to the narrative.

C-165-020 VISION 2040 has been revised to address this issue.

C-165-021 VISION 2040 has been revised to address this issue.

C-165-022 VISION 2040 has been revised to address this issue.

C-165-023 The narrative describes an efficient transportation system.

C-165-024 VISION 2040 has been revised to address this issue.

C-165-025 This policy has been rewritten and is now MPP-T-28.

Kitsap County Comments:
Draft Vision 2040

Section	Page*	Comment
MPP-T-24	71	Propose change of "…for transit-supportive densities and land use" to "urban densities and land uses". The definition for "transit-supportive densities and land uses" is not defined by the Growth Management Act or Central Puget Sound Growth Hearings Board and the appropriate authority for determining transportation funding targets as a function of urban densities and land use.
General	71	OVERVIEW OF TRANSPORTATION ACTIONS AND MEASURES 1st Paragraph. PSRC is developing 'a regional **Passenger Only Ferry** service plan…'
MPP-PS-4	74	Redundant Policy, restates basic implementing policy of GMA and the associated RCWs. Propose removal as unnecessary.
MPP-PS-5	74	Propose change of language from "Encourage the design of public facilities and utilities in the rural area" to "Encourage the design of public facilities and utilities serving the rural area". Many regional and essential public facilities are located within the rural areas due to geographical location, topography, existing infrastructure, etc. and serve urban areas. The design of these facilities should be reflective of the areas they serve and not be limited due to their required location.
Specific Services	75	**Sanitary Sewer.** Add modified language from **Stormwater Management Systems** to the end of the paragraph: "Measures could include improving collection systems to reduce the amount of rainwater and groundwater that infiltrates the pipes, which then increases available capacity at treatment plants, ~~could reduce~~ reducing the need for expanded treatment facilities."
Specific Services	75	**Stormwater Management Systems.** Modify or remove 4th sentence. Modified: "Measures could include improving collection systems to reduce the amount of rainwater and groundwater that infiltrates the pipes, which then increases available capacity at treatment plants, ~~could reduce~~ reducing the need for expanded treatment facilities."
MPP-PS-9	77	Propose change to "~~Require~~ Encourage new subdivisions in the urban growth area to be served by sanitary sewers systems or technology approved by the Washington State Department of Ecology."
MPP-PS-10	77	Propose addition of "Encourage replacement of failing septic systems within the urban growth area with sanitary sewers."

* Page of PSRC Publication: Draft Vision 2040 – July 2007

C-165-026 C-165-027 C-165-028 C-165-029 C-165-030 C-165-031 C-165-032 C-165-033

C-165-026 This policy has been incorporated into what is now MPP-T-11. See the sidebar on Transit-Supportive Densities and also see RCW 47.80.

C-165-027 The ferry plan is designed to be comprehensive.

C-165-028 Policy MPP-PS-4 was retained as written.

C-165-029 Policy MPP-PS-5 was retained as written.

C-165-030 See response to C-165-029.

C-165-031 VISION 2040 was revised to clarify the narrative on this issue.

C-165-032 VISION 2040 has been revised to address this issue. What is now MPP-PS-8 has been revised to address sewer connections or better technology alternatives. What is now MPP-PS-10 addresses "failing" septic systems.

C-165-033 VISION 2040 was revised to address this issue. See response to C-165-032.

Comment Letter

Response to Comment Letter

Robin McClelland

From: Benjamin Brackett
Sent: Friday, September 07, 2007 2:18 PM
To: Robin McClelland
Subject: Comment on VISION 2040 from...

C-160

Importance: High

Cindy Gorgas at Pierce County Community Services.

Thanks Robin,
Ben

Benjamin Brackett
Associate Planner
(206) 971-3280
bbrackett@psrc.org

-----Original Message-----
From: Cindy Gorgas [mailto:CGORGAS@co.pierce.wa.us]
Sent: Friday, September 07, 2007 2:12 PM
To: Benjamin Brackett
Subject: Re: 9.19.07 PSRC Special Needs Transportation CommitteeMeeting Agenda

Thanks Ben !

On another note :
Would you please forward (to Norman Abbott) this comment about the PSRC Draft Vision 2040 document .

I think it would be beneficial to add some sort of component to the document that encourages Community Gardens as a piece of affordable multi family urban households; or something about Community Gardens or some incentive for local farmers / famers markets , ect .

C-160-001

Sorry to get this to you at the last minute , I hope to send you (Norman Abbott) more on this next week - will that be too late to add to my comment ?

Sorry , I'm really swamped until Sept. 12th - Can we e-mail each other more about his next week ? If we can have more time I can work with you on better language about this topic and have an divsion of our Agency (WSU Extension) join us and add this component. With growth I think we can't leave behind agruculture and the quality of consumables as well as transportation costs to transoprt food stuffs from grower to market.

Cindy Gorgas
Program Manager 1
Pierce County Community Action Programs
253-798-2714
cgorgas@co.pierce.wa.us

>>> "Benjamin Brackett" <BBrackett@psrc.org> 9/7/07 12:28 PM >>>
Good Afternoon Everyone!

Attached you will find the agenda packet for this month's meeting of the Special Needs Transportation Committee. The meeting will be held on Wednesday September 19th, from 10:30 - 12:30 in the Sound Transit Boardroom. This month we should have some interesting discussions on a nice variety of topics including suggested edits to the JARC and New Freedom scoring criteria, edits to the application form itself, and an initial foray into scoping an update to the Coordinated Transit-Human Services Transportation Plan/ Destination 2030. I've included a series of materials for your review and thought;

1

C-160-001 VISION 2040 has been revised to address this issue. This concept is noted in the narrative discussion.

however to save space I chose not to add the full version of the plan. It can be accessed at http://www.psrc.org/boards/advisory/specialneeds/plan.htm.

I hope to see you all on the 19th.

As always, if you have any questions or concerns just let me know.

Thanks!

Ben

Benjamin Brackett

Associate Planner

(206) 971-3280

bbrackett@psrc.org

Note: This page of comments does not require a response.

C-173

Pierce County
Department of Planning and Land Services
CHUCK KLEEBERG
Director

2401 South 35th Street
Tacoma, Washington 98409-7460
(253) 798-7210 • FAX (253) 798-7425

September 11, 2007

Norman Abbott
Director of Growth Management Planning
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98105-1035

Re: Draft Vision 2040

Dear Mr. Abbott:

Thank you for the opportunity to review and comment on the Draft Vision 2040, July 2007. The document represents an impressive amount of research and coordination on the part of the Puget Sound Regional Council (PSRC) staff and we commend the regional council for their efforts.

Vision 2040 is well written and outlines a clear path for the next thirty years by providing direction for the region while allowing for unique differences of local jurisdictions. The importance of working together as a region cannot be understated, particularly as we face greater international competition and environmental challenges. We believe that the current success of the Puget Sound region is in part due to the goals and growth policies of Vision 2020 and find Vision 2040 to provide the comprehensive framework necessary to achieve similar success through the upcoming years.

We support the overall Draft Vision as it presents a growth strategy for the region that balances the natural environment with an economic growth plan for prosperity throughout the region. The economic policies are specific and, in conjunction with the Prosperity Partnership, set the region on a directed and successful course. Our economy and quality of life is dependent upon abundant natural beauty and resources. We would welcome strengthening the document to reflect how vitally important it is to recognize the limitations of our natural resources and to ensure measures are taken to allow these resources to be a part of our future.

We are pleased to see Vision 2040 includes policies addressing healthy populations and communities as well as climate change. Stronger ties should be provided for both of these subjects particularly in the transportation policies. In Puget Sound the major contributor to greenhouse gases is transportation and the region would do well to have directed policies that

(Comment continues on following page)

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C-173-001 Thank you.

C-173-002 Thank you. Concur regarding the importance of quality of life and natural resources.

C-173-003 VISION 2040 has been revised to address this issue. The concept of sustainability is now woven throughout VISION 2040 as an important thread that ties together the environment, land use, transportation, and economy as interrelated components that shape our quality of life. The word sustainability is now included in the title of the Environmental Framework.

C-173-004 Comment noted.

C-173-005 VISION 2040 has been revised to address this issue. The overarching goal includes the word "cleaner" and the transportation system will "contribute to better public health." In addition, the Transportation section now has a subsection entitled "Sustainable Transportation" that includes policies that address transportation and the effects of emissions.

Continuation of C-173-005

ensure transit and other modes' choices are a strong component of our future transportation systems.

Thank you for the opportunity to review the document. We look forward to aligning our local plan toward the goals of 2040 and working with PSRC in the future.

Sincerely,

Chuck Kleeberg
Director
Pierce County Planning and Land Services

c: C.E. "Chip" Vincent, Principal Planner, PALS
Denise Dyer, Economic Development Manager
Karen Goon, Special Assistant to the Executive on Transportation

F:\WPFILES\LONG\PSRC\DRAFT V2040.DOC

C-106

Snohomish County
Executive Office

Aaron Reardon
County Executive

(425) 388-3460
FAX (425) 388-3434
MS #407
3000 Rockefeller Avenue
Everett, WA 98201-4046

September 7, 2007

Norman Abbott, Ph.D.
Director of Growth Management Planning,
Puget Sound Regional Council,
1011 Western Avenue, Suite 500,
Seattle, WA 98104

RE: PSRC VISION 2040 Supplemental Draft Environmental Impact Statement

Dear Dr. Abbott:

Thank you for the opportunity to comment on the Vision 2040 Supplemental Draft Environmental Impact Statement. The draft Vision 2040 materials address many of Snohomish County's comments on the earlier Vision 2020 Update Draft Environmental Impact Statement. The county appreciates PSRC efforts to gather and incorporate input from Snohomish County and our communities, and we offer the following comments.

1. **Delete Multicounty Planning Policy DP-26**. As a member of Snohomish County Tomorrow (SCT), county staff and elected officials participated in the development of a comment letter from SCT. SCT was unable to come to a consensus for or against deleting proposed MPP DP-26.

   Throughout the drafting of the multicounty planning policies, Snohomish County has consistently expressed concern about including any policies that restrict fully contained communities such as DP-26 and DP-27. My July 31, 2006 letter to you noted that FCCs are allowed by GMA as a way to plan for growth and focus urban growth in appropriate areas. Snohomish County has policies that allow for FCCs, and a portion of Snohomish County's 2025 population growth target is allocated to them. Without the potential for FCCs, Snohomish County would have to reallocate 15,000 of population growth to other cities and urban areas. The FCC policies and codes adopted in Snohomish County are based on lessons learned in other counties in the region and are designed to ensure an adequate job base, necessary infrastructure and community input. The regional consultation required in MPP DP-27 provides an additional safeguard.

C-106-001

county.executive@co.snohomish.wa.us
www.co.snohomish.wa.us

C-106-001 After reconsideration, a minor revision was made to this policy.

2. **Add a policy for improving road networks inside urban growth areas.** The Transportation policies would benefit from identification and development of a policy that specifically addresses the need to improve existing roadway networks in urban growth areas where urban infill is being targeted. In many urban areas of Snohomish County roadways were originally built to convey rural farm related traffic from farm to market. These roads were not designed and constructed to convey the high traffic volumes and mix of vehicles (including larger trucks) that they carry presently. This presents both mobility/congestion issues and safety concerns. Improving existing roadways is an essential part of accommodating population and employment growth.

3. **Address aging bridges**. The transportation section would also benefit from a discussion of how the region will address the existing aging infrastructure with regard to bridges. Particularly in light of the recent catastrophic structural failure in the Minneapolis/St. Paul area, it is important to address how the needed level of funding to maintain and improve this aging infrastructure will be addressed.

4. **Provide additional discussion on changing demographics**. The aging of the baby boomer population and the increasing ethnic/racial diversity of the region are changing the needs of our citizens. By 2020, over 15% of Snohomish County's citizens will be 65 years old or older. This suggests changing how we think about designing and delivering all forms of services and infrastructure including transportation, housing, public services and jobs. As we become a more multi-lingual society, our education, government services, job training and employment services will need to accommodate the multiple languages spoken in our region. Language differences are reflective of cultural differences which we must also accommodate as more of our working age, school age and retired population trace their origins to a variety of countries.

5. **Strengthen affordable housing provision.** My July 31, 2006 letter noted that the declining affordability of housing is one of the top issues threatening our region. This topic area would benefit from more specific discussion and analysis of alternative mitigation strategies than it received in the SDEIS and draft Vision 2040 documents. The region needs to commit to a strong affordable housing provision; not only for low-income and minority households, but also for all moderate and middle income working households.

6. **Give greater emphasis to the need for additional funding for infrastructure, including sanitary sewer hookups.** My July 31, 2006 letter asked PSRC to assess growth alternatives against funding for implementation. Vision 2040 must consider the capability of the region to implement the preferred alternative chosen and to mitigate the impacts as fully as possible. Neither the DEIS nor the SDEIS adequately assess costs and funding sources to provide infrastructure and services needed for planned growth. My previous letter gave an example related to transportation. Our sanitary sewer systems face similar infrastructure needs. As more growth is directed to urban growth areas, new subdivisions are being provided with sanitary sewer disposal systems in areas that previously were only served by onsite septic disposal systems. Discussion should be provided on financing mechanisms for older residences in these areas so that they can connect to sewer systems. Sewer hook-up for already established residences is prohibitively expensive. Financing for property owners would help to further goals of having residences in urban growth areas connected to sewers. In turn, sewer hook ups would support other environmental goals such as improving water quality.

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C-106-002
C-106-003
C-106-004
C-106-005
C-106-006

C-106-002 VISION 2040 has been revised to address this issue by revising policy language as well as the accompanying narrative. See what is now MPP-T-11 in the final document.

C-106-003 VISION 2040 has revised its treatment of the importance of maintenance and preservation of the transportation system. The goal for the subsection "Maintenance, Management, and Safety" now states: "As a high priority, the region will maintain, preserve, and operate its existing transportation system in a safe and usable state."

C-106-004 VISION 2040 has been revised to strengthen the discussion of demographic change, especially in Part I: Introduction and in the Housing section of Part III: Multicounty Planning Policies.

C-106-005 VISION 2040 has been revised to address this issue. Housing is now a separate policy section that includes revised provisions addressing affordability.

C-106-006 VISION 2040 has been revised to address this issue, with funding issues moved to the front of Part III: Multicounty Planning Policies.

7. **Delete proposed policy DP-7 or modify it to allow local discretion and avoid unfunded mandates.** Draft policy DP-7 reads, "Create consistent countywide targeting processes for allocating population and employment growth including establishing: a) local employment targets, b) local housing targets based on population projections, and c) local housing and employment targets for each designated regional growth center." GMA does not require setting or monitoring housing targets, so parts (b) and (c) of this policy would create new unfunded mandates for local governments. In addition, Snohomish County already has a process for setting growth targets in collaboration with our cities. The process has evolved over the years and is working well. Requiring all counties and cities to replace their existing local approaches with a one-size-fits-all process would require a great deal of work, and it may discourage local engagement in the process, so we suggest deleting or revising DP-7.

C-106-007

The county appreciates the opportunity to provide these comments on the SDEIS and draft Vision 2040 documents. We acknowledge and appreciate the work of the PSRC board, staff, and consultants on this important project. Please let me know if there is anything further we can do to help PSRC adopt final Vision 2040 documents that describe a coherent vision for the region while leaving room for the local planning authority provided under GMA.

Sincerely,

Aaron Reardon
County Executive

cc: Councilmember Dave Gossett, Snohomish County Council Chair
Mark Soine, Deputy County Executive
Peter Camp, Executive Director
Craig Ladiser, Planning and Development Services Director
Steven Thomsen, Department of Public Works Director
Janelle Sgrignoli, Human Services Director

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C-106-007 The related action in VISION 2040 has been revised to clarify that the objective is not a "one size fits all" approach. The objective is more consistency among the various processes.

Robin McClelland

C-138

From: Toy, Stephen [Steve.Toy@co.snohomish.wa.us]
Posted At: Friday, September 07, 2007 3:57 PM
Conversation: Proposed VISION 2040 Regional Level Action - Buildable Lands
Posted To: Vision 2040
Subject: Proposed VISION 2040 Regional Level Action - Buildable Lands

I have reviewed the Actions shown in Appendix 1 of the July 2007 Draft VISION 2040 and have concerns regarding the following proposed Regional Level Action on page A-1-4:

> **Buildable Lands**
>
> The **Puget Sound Regional Council**, together with countywide planning groups and member jurisdictions, will develop a regional methodology to evaluate buildable lands as part of a region wide effort to create useful and practical data for buildable lands analysis. As part of this effort, **PSRC** will also develop guidance for addressing reasonable measures. *(mid-term)* (DP-18, 19)
>
> *Results and Products: Common process for buildable lands analysis; regional guidance for addressing reasonable measures*

Firstly, it is not clear to me how this action relates to Multicounty Planning Policies DP-18 and DP-19:

> **MPP-DP-18** 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.
>
> **MPP-DP-19** Support the transformation of key underutilized lands to higher-density mixed-use areas to complement the development of centers and the enhancement of existing neighborhoods.

These policy citations for the proposed buildable lands action appear to be in error.

C-138-001

Secondly, achieving the desired result of a "common process for buildable lands analysis" in the region would be very problematic.

The GMA buildable lands statute (RCW 36.70A.215) requires that countywide planning policies be adopted to establish the buildable lands review and evaluation programs. As a result, the definitions and methods used for preparing the buildable lands reports (both in 2002 and 2007) were developed at the county level, and apply to the county and cities within the county. It is not surprising that, for a variety of reasons, this has resulted in technical differences in the buildable lands approaches used over the past 10 years by the four counties in the central Puget Sound region. It would be expensive and difficult to retrofit these different approaches into a common process for the buildable lands analysis in the region. It is not clear why a major effort of this type would be undertaken at this time, especially in the context of the current GMA reliance on the countywide planning policies to define the buildable lands review and evaluation programs, and given the considerable flexibility identified in the existing CTED buildable lands guidance document regarding the implementation of the county-level buildable lands analyses:

> "Flexibility is built into the [buildable lands evaluation] process offered in the guidelines to accommodate various approaches and techniques that jurisdictions have developed for growth management planning since 1990. It recognizes the development of their original county-wide planning policies and GMA comprehensive plans as well as plan monitoring systems required by either their county-wide planning policies or GMA plans." (from p. 21 of CTED's *Buildable Lands Program Guidelines*, June 2000).

C-138-002

Thank you for the opportunity to comment and for your attention to this matter.

Stephen Toy
Principal Demographer
Snohomish County Planning and Development Services
425-388-3311, ext 2361

9/10/2007

C-138-001 VISION 2040 has been revised to address this issue. See policy references (MPP-DP-6 through MPP-DP-8) for DP-Action-8.

C-138-002 VISION 2040 has been revised to address this issue. See revised buildable lands methodology, DP-Action-8.

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R-153

Joyce Olson Eleanor
Chief Executive Officer

September 7, 2007

Mr. Norman Abbott
SEPA Responsible Official
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, Washington 98104

Subject: **Comments on the Draft VISION 2040 Document from Community Transit**

Dear Mr. Abbott,

I am writing to transmit Community Transit's comments on the draft VISION 2040 document put forth for review this past July. The document was reviewed by our Strategic Planning staff and the following comments represent our collective thoughts and suggestions.

As a transportation provider we wish to congratulate PSRC for crafting a regional vision that seeks to concentrate future growth in urban centers already possessing transportation infrastructure and services. The numerous references to pedestrian, bicycle and transit-oriented transportation networks and development reinforce and promote goals long shared by Community Transit. In particular, the references to land use and transit integration mirror portions of our pending Six Year Transit Development Plan update.

A constructive comment concerns the relationship of centers and corridors as described in the VISION and its multi-county planning policies (MPPs). In recent planning efforts, Community Transit has identified a network of "transit emphasis corridors" in Snohomish County. These corridors generally connect centers, have existing or potential high densities of population and employment, are currently or could potentially be served by transit and are likely to have long-term market demand for transit. Our goal in identifying the corridors is to begin planning for long-term prioritization of service investment in these areas and to signal land use and road authorities that appropriate steps can be taken to encourage transit market development on this network. In MPP-T-21 (p. 71), the VISION calls for HOV investment "to and within centers *and along corridors connecting centers*." We suggest similar language might be employed in MPP-DP-11 (p. 43).

> Give funding priority – both for transportation infrastructure and for economic development – to designated regional growth centers consistent with the regional vision, including regional county-level and local funding.

Given the link between land use and transit it seems that the development pattern MPP related to transportation infrastructure should match the transportation section MPP and add *"along corridors connecting centers"* to its scope.

Also, relating to corridors, MPP-DP-49 (p. 55) calls for tailoring concurrency programs for "centers and other subareas to encourage development that can be supported by

(Comment continues on following page)

R-153-001
R-153-002
R-153-003

R-153-001 Thank you.

R-153-002 See the expanded narrative in the Transportation subsection titled "Greater Options and Mobility." See also the new policy MPP-T-29 on preserving rights-of-way for transit.

R-153-003 The existing language was retained.

Comment Letter

transit." We recommend that this policy also be enhanced to say *"centers, corridors connecting centers and other subareas."* Community Transit is already working with Snohomish County to address concurrency issues on three corridors in the County. Concurrency is often a corridor-related issue.

A sidebar on page 70 discusses transit supportive densities. The density thresholds listed (characterized as minimum) seem to be more representative of King County and are less realistic for Snohomish County. We suggest softening the language to indicate that these are targets. We also suggest adding Bus Rapid Transit (BRT) as a mode to the discussion of local transit service and light rail. Community Transit will be implementing Swift BRT on SR-99 in 2009 and King County Metro is planning five Rapid Ride BRT lines in their service area. Densities in the SR-99 corridor are sufficient to support BRT today. Adding BRT and its market requirements to the transit mode discussion seems appropriate in light of the likely future role for this emerging service type.

We also noted a lack of discussion around wireless technology, wireless communities and their future impact on travel patterns and work/home proximity.

Our staff also noted concerns about inherent conflicts between the goals of providing affordable housing, high quality urban design and concentrating growth in centers. Discussion of this conflict and mention of mitigating measures such as developer incentives might enhance the plan.

Finally, a minor reference correction on page 41, lower right cell of the "Centers in Vision 2040" table. The Small Cities list is on page 17 rather than page 29.

Please let me know if you would like to discuss any of our comments. I can be reached at 425/348-2368 or roland.behee@commtrans.org . Thank you for the opportunity to comment on the plan.

Sincerely,

Roland Behee
Supervisor of Strategic Planning

Continuation of R-153-003
R-153-004
R-153-005
R-153-006
R-153-007
R-153-008

Response to Comment Letter

R-153-004 The intent of the language is not to set density thresholds or targets.

R-153-005 VISION 2040 has been revised to address this issue.

R-153-006 VISION 2040 has been revised to address this issue. For example, PS-Action-4 calls for a telecommunications report.

R-153-007 VISION 2040 has been revised to address this issue. See the Housing section policies and actions.

R-153-008 VISION 2040 has been revised to address this issue.

Comment Letter

R-021

Kitsap
Economic Development Alliance

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September 26, 2007

Mr. Norm Abbott
Director, Growth Management
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104

Dear Norm:

The Kitsap Economic Development Alliance (KEDA) submits the following comments relative to the Draft Vision 2040 document.

KEDA applauds the efforts and dedication presented by the leadership and staff of the Puget Sound Regional Council in creating the Vision 2040 draft document that will act as the guide for job and population growth in our region for the coming decades.

Understanding the current trend of employers and jobs centering in King County and key cities, it is KEDA's hope that future growth would push toward a clearer balance between job growth and population growth.

KEDA urges PSRC to consider in final Vision 2040 projections that goal statements include a more equitable distribution of job growth in key areas, relative to population growth in each of those areas. KEDA is willing to step forward to help make this a reality.

We stand ready to assist as we move our region forward.

Sincerely,

Kathy S. Cocus
Kathy S. Cocus
Interim Executive Director
Kitsap Economic Development Alliance

cc: Kitsap Economic Development Alliance Executive Committee
Bob Drewel, Executive Director
Bill McSherry, Director, Economic Development

R-021-001
R-021-002

Response to Comment Letter

R-021-001 Thank you.

R-021-002 VISION 2040 has been revised to address this issue and now includes policies and narrative related to jobs-housing balance. The concept has also been made more explicit in Part II: Regional Growth Strategy. See also the new jobs-housing policy MPP-Ec-17 in the final document.

R-100

PIERCE TRANSIT

September 5, 2007

Mr. Norman Abbott
Director of Growth Management Planning
SEPA Responsible Official
Puget Sound Regional Council
Seattle, WA 981

Dear Mr. Abbott,

Pierce Transit has reviewed the Draft Vision 2040 which is out for public comment. Pierce Transit supports the Draft Vision 2040 plan and the growth concepts it contains. We want to congratulate the Puget Sound Regional Council on the leadership it demonstrates in regional and transportation planning.

R-100-001

Attached please find some specific comments on the Draft Vision 2040. We appreciate the opportunity to comment on this document. If you have any questions concerning our comments, please contact Patricia Levine, Policy and Grant Development Manager, (253) 984-8213.

Sincerely,

Louise Bray
Vice President for Policy, Planning
and Public Affairs

Enclosure

R-100-001 Thank you.

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Pierce Transit's Comments on Vision 2040
September 5, 2007

1. A Regional Strategy for Accommodating Growth: (pp 13-22). The document discusses both regional growth centers and regional geographies. Additional narrative describing the differences between the two would be useful as the relationship of the regional growth centers and the regional geographies is not clear. There should be a specific list of the regional growth centers. The map on page 21 appears to be the only identification of the regional growth centers but names are not connected to all centers. Later in the document, it is not always clear if transportation funding is directed towards these specific growth centers or also regional geographies. R-100-002 R-100-003

2. Development Patterns, Land Use, Housing and Orderly Development. (pp 35- 47)

The goal of developing within urbanized areas, creating transit oriented pedestrian oriented communities and affordable housing presents an inherent conflict. With current economic trends it is extremely difficult to develop affordable housing in existing urban centers. This conflict presents a key issue that the region needs to specifically address. Much of the region's affordable housing is being developed in outlying areas, and often areas outside of the urban growth boundary. With even middle class individuals facing a serious challenge in obtaining affordable housing, there will be continued pressure for sprawl. Vision 2040 should address this issue head on. Otherwise, it may provide to be the fatal flaw in achieving the regional plan. R-100-004

MPP-DP1 (p 37) – Protect and enhance significant open spaces, natural resources, and critical areas. This policy is so general that it will be difficult to use to guide local government actions. Further definition of the policy would make it more meaningful. R-100-005

MPP-DP2 (p 37) – Establish best management practices that protect the long-term integrity of the natural environment, adjacent land uses and the long-term productivity of resource lands. While many of the policies are necessarily general statements, the wording of this policy directly raises the question of who should establish the best management practices? Is this something that the PSRC should do? R-100-006

Mineral Lands (p 36). The discussion of this topic describes the difficulty of reclaiming mined lands. However, there is no multicounty planning policy regarding reclaiming mineral lands. We suggest that this should be a multicounty planning policy. R-100-007

3. MPP-DP-17 (p 43) - Direct funding to centers, including secondary centers and town centers, through countywide, subregional, and local investment processes and funding strategies. & MPP-DP-14 (p 43) – Give funding priority – both for transportation infrastructure and for economic development to designated regional manufacturing/industrial centers consistent with the regional vision, including regional, county level, and local funding. It is not clear if there is a difference between direct funding and give funding priority? Are these of equal priority, or does one have priority R-100-008

(Comment continues on following page)

R-100-002 VISION 2040 has been revised to address this issue. The use of regional geographies helps identify types of places in the region based on ability to absorb population and employment growth. The narrative in the Regional Growth Strategy has been expanded to clarify the purpose of regional geographies and to provide detail concerning the distribution of growth. Both the narrative related to centers and the accompanying centers chart have been revised.

R-100-003 VISION 2040 has been revised to address this issue. The narrative and table describing centers is now clearer, the goal for other centers is more specific, and the policies regarding regional growth centers, manufacturing/industrial centers, and other centers have been clarified with regard to funding prioritization.

R-100-004 Concur. The housing policies in VISION 2040 are now a separate section in Part III: Multicounty Planning Policies. There also is a policy in the Economy policy section that calls for incentives and investments to create a better jobs-housing balance.

R-100-005 The policy was left as written.

R-100-006 Comment noted.

R-100-007 Although this issue was considered, a new policy was not added. VISION 2040 has addressed this issue in the narrative.

R-100-008 VISION 2040 has been revised to address this issue. Policies on centers' funding are now numbered MPP-DP-7, MPP-DP-10, and MPP-DP-13.

over the other? If they have equal priority, perhaps the language should be the same for both policies. Both could say "direct funding".

4. What the Region Can Do. (p 50) Regionally managed funds are prioritized to regionally designated centers. We suggest that there be discussion of, and attention, to all transportation funds, including federal funds directed to the WSDOT, not just 'regionally managed funds". To the extent possible, all transportation funds should be consistent with supporting the regional growth strategy.

5. Page 69 PSRC Federal Funds Competitive Process. Line 5, the wording should be "some" or "non earned share" of Federal Transit Administration (FTA) transportation funds as not all FTA funds are part of the PSRC Competitive Process.

R-100-010 R-100-009 Continuation of R-100-008

C-100-009 The policies apply to all funding sources.

C-100-010 VISION 2040 was revised to address this issue. The language now refers to "certain" FTA funds.

Port of Seattle

R-137

September 7, 2007

Norman Abbott, SEPA Responsible Official
Puget Sound Regional Council
1011 Western Ave, Suite 500
Seattle, WA 98104-1035

Subject: Comments on the Draft Vision 2040 and Supplemental Draft Environmental Impact Statement (SDEIS)

Dear Mr. Abbott:

Thank you for the opportunity to comment on the Draft Vision 2040 Plan and SDEIS. The Draft Vision 2040 Plan identifies a preferred alternative for a regional growth strategy and stems from last year's Draft Vision 2020 Update DEIS. We reviewed that document last year, and I am attaching a copy of our comments because some still apply, as referenced later in this letter.

The Port's comments in the Vision 2020 Update DEIS focused mostly on land-use, transportation and air quality concerns. Over the past year, the Port has worked with the Regional Council to strengthen many of the Metropolitan Planning Policies to better protect industrial lands, place a higher emphasis on freight mobility and needed infrastructure, and to protect the region's air quality attainment status. Some of our concerns were addressed to some extent in the Draft Vision 2040 Plan through the updated Multicounty Planning Policies. However, we continue to be concerned about the adequacy of the measures that form the basis for future decisions regarding freight mobility, the amount and location of land needed for a healthy industrial base, and water-dependent industry.

R-137-001

The Port of Seattle's mission is to create jobs, opportunity and quality of life in King County and the region. The Port of Seattle has set a goal for new ways of doing business to be the cleanest, greenest and most energy-efficient port in the United States. To accomplish this goal, the Port will continue to work with tenants and the community to achieve our economic development goals while minimizing environmental impacts. This is a challenge as activity continues to grow at Sea-Tac Airport where air passengers increased in 2006 to just shy of 30 million passengers. At the Seaport, container cargo in 2006 maintained volumes of 2.0 million TEUs (twenty-foot equivalent units). However, the demand for container cargo is growing on the west coast and the Port of Seattle must be positioned to compete for additional business that will help drive the local economy and provide jobs.

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R-137-001 Comment noted. The Destination 2030 update will provide an additional opportunity to address this issue.

Port Comments on the Draft Vision 2040 Document:

An Environmental Framework

The narrative describing the environmental situation deals only with problems of the natural environment and doesn't address the "built" environment, economic development, roads, schools, etc. The focus should be broadened. R-137-002

R-137-002 Comment noted.

A Regional Strategy for Accommodating Growth

Page 13/14: An additional bullet should be added on page 13 saying "existing MICs should be protected and buffered from incompatible uses and provided with adequate public facilities and services." R-137-003

R-137-003 VISION 2040 has been revised to address this issue.

Multicounty Planning Policies

Environment:

Page 29: Goals and Policies; MPP-En-3: Last sentence of policy should be modified to include water quality, as well as air quality and climate change. R-137-004

R-137-004 VISION 2040 has been revised to include water quality.

Page 32: Goals and Policies; MPP-En-15: The Port continues to be concerned with the language used in this policy. It says "restore, where appropriate and possible, the region's freshwater and marine shorelines, watersheds and estuaries to a natural condition for ecological function and value". This is very broad language that could be interpreted in many different ways. The Port recommends "Identify opportunities to restore areas of natural habitat on freshwater and marine shorelines." R-137-005

R-137-005 This issue was considered, but the existing language was retained.

Development Patterns:

Page 40: Regional Manufacturing Industrial Center: The Port appreciates the increased emphasis for the MICs in the MPPs, especially listed on page 43 in MPP-DP 12, 13 and 14. The Port believes it is important to state that housing should not be included in MICs because it is an incompatible use. R-137-006

In regard to the discussion of MICs, Port activity, whether aviation or marine related, supports the economy and provides broad based employment in the transportation sector. Along with the general discussion on the importance of the Puget Sound region as a gateway, additional focus on the important link between port resources, land use, and the economy is warranted.

R-137-006 VISION 2040 has been revised to address this issue.

Page 44: Compact Urban Communities and Redevelopment Opportunities: MPP-DP-19 supports the transformation of key underutilized lands for higher density mixed-use development. Such redevelopment must consider industrial lands compatibility and supply. R-137-007

R-137-007 VISION 2040 has been revised to address this issue. What is now MPP-DP-15 has been clarified by including references to brownfields and greyfields as examples of underutilized lands.

Page 47: Overview of Land Use Actions and Measures: An action item should include a discussion on the need of industrial land capacity; do we need to grow it; are there industrial areas that are not currently listed as MICs but that need to stay industrial because they fulfill a function that is vital to the region? Does the given industrial strategy identify economic implications? R-137-008

Page 49: Housing; Focusing Housing into the Urban Area: This section should focus on housing in regional centers and not MICs. R-137-009

Page 54: Incompatible Land Uses: An additional policy should be included to protect Industrial Lands from incompatible land uses. R-137-010

Economy:

Page 60: Regional Approach; Goals and Policies MPP-EC-4: Leveraging the region's position as an international gateway requires a certain level of investment in the regional transportation system. The Economic Action Plan does not address the specific or general needs for freight or gateway related land uses. Research on the freight economy in Puget Sound would help define next steps for developing a coherent gateway strategy. R-137-011

Page 62: Page 62: Places; Goals and Policies: The Port appreciates the inclusion of MPP-EC 17 on MICs and strongly supports it. We would also encourage the PSRC to update its industrial lands analysis to ensure that the region will have a sufficient supply in the future. It may be necessary to designate additional areas that are currently zoned industrial but not (yet) designated as MICs to ensure that they get the infrastructure and economic development support they need to fulfill their regional function. R-137-012

Transportation

Page 64: Transportation; Regional Approach: The Port appreciates the increased focus that the Draft Vision 2040 Plan and the MPPs give to freight mobility needs. This is an issue that in recent months received increasing attention at the national level. It is likely that future federal transportation legislation will include provisions for better integration of freight mobility needs into regional transportation planning processes. R-137-013

Page 66: Regional Approach; Maintenance, Management, and Safety: typo (missing "that") in 3rd paragraph first sentence R-137-014

Page 68: Supporting the Growth Strategy; Goal and Policies: The goals and policies included in Vision 2040 more strongly support investments in freight and freight transportation system improvement priorities (MPP-T-14 and MPP-T-15) than Vision 2020. We greatly appreciate the inclusion of these policies.

To provide clear direction on what these policies entail, we encourage you to include yet more detail to prioritize freight facilities and systems. The recommended policy language below was R-137-015

(Comment continues on following page)

R-137-008 These issues will be addressed as part of the industrial lands inventory and strategy called for in action DP-Action-6.

R-137-009 VISION 2040 has been revised to address this issue. Changes in the narrative and what is now MPP-Ec-18 address this issue.

R-137-010 VISION 2040 has been revised to address this issue.

R-137-011 VISION 2040 has addressed this issue in the Transportation Actions. See T-Action-6.

R-137-012 VISION 2040 has addressed this issue. See DP-Action-6.

R-137-013 Thank you.

R-137-014 Thank you. We have made the correction.

R-137-015 VISION 2040 has been revised to create a subsection entitled "Freight" containing three policies that address these concerns. What is now MPP-T-18 includes the phrase "increase reliability and efficiency." T-Action-6 now includes a reference to "regional manufacturing/industrial centers." Also, see the expanded sidebar. This issue will also be addressed during the Destination 2030 update.

included in the Draft Vision 2020 Update comment letter in July 2006 for consideration and inclusion.

- Give priority to trucks on the existing system of major truck routes to help reduce truck traffic on other facilities.
- Provide adequate truck access to Manufacturing-Industrial Centers, seaport-and airport facilities, and intermodal rail yards.
- Complete a regional system of truck routes linking Manufacturing-Industrial Centers and freight intermodal facilities.
- Provide reliable freight access to intermodal facilities serving international trade, such as sea-and airports and intermodal rail yards.
- Enhance the existing system of major truck routes to provide reliable freight mobility between/among intermodal freight facilities and Manufacturing-Industrial Centers
- Manage the transportation system to enhance the reliability and efficiency of freight movement in the region
- Adopt a regional transportation policy that ensures preservation of critical freight intermodal sites and corridors to meet long-term regional freight needs.

Including more detailed, focused language will help local jurisdictions update the transportation elements of their comprehensive plans in accordance with the new Multicounty Planning Policies.

Continuation of R-137-015

At the PSRC, the increased focus on freight mobility will need to be incorporated in the Destination 2030 Update, which is currently in the scoping stage. Achieving the goals outlined above will require greater emphasis on freight mobility. We are concerned that PSRC currently does not have the analytical capabilities to translate these policies into actions at the regional level or policy guidance at the local level. For example, solid freight data is needed for review and update of the Regional Freight and Goods Transportation System. Yet, the traffic analysis for the recommended Vision 2040 alternative did not evaluate its impact on freight mobility—an omission we commented on last year. Only general measures of delay are used in addressing freight mobility needs. Such a generic measure is not sufficient in the long run.

R-137-016

We will continue to work with PSRC staff to raise the profile and address the needs of freight moving in and through the region. Both the Port, and the economy of the region, depend on a functioning freight transportation system for continued viability and growth.

Page 69: Supporting the Growth Strategy: Sidebar on "Complete Streets". Definition should also reference trucks & freight movement, and the need to prioritize the movement of trucks on routes that are designated as mayor truck streets. (The City of Seattle's Complete Street Ordinance contains such a provision.)

R-137-017

Implementation

Page 82: Policy and Plan Review; Review of Subarea Plans for Designated Regional Growth Centers: Does this apply to MICs such as Duwamish? Do these subarea plans exist?

R-137-018

R-137-016 The issue of freight mobility will also be considered when Destination 2030 is updated. Also, the transportation analysis was conducted at a broader conceptual level, commensurate with the conceptual alternatives.

R-137-017 VISION 2040 has been revised to address this issue. The sidebar was revised to include a reference to freight.

R-137-018 See DP-Action-17. It includes manufacturing/industrial centers.

Appendices

4) Appendix 4, p. A.4.102: The Port supports the statement to undertake future work to update the industrial lands analysis. We suggest that it is a must, not potential action. There needs to be a review of the current list of MICs and the areas that are industrial and function as MICs yet are not (yet) designated as such. It may make sense for the region to consider including Sea-Tac Airport and the Green River Valley as MICs:

The region has a role in supporting local jurisdictions which provide specific land uses that provide a regional function.

SDEIS

1. Section 5.2 Land Use**:** In the comment letter on the Draft Vision 2020 Update, the Port stated that none of the alternatives adequately evaluated the impacts that would occur to the MICs as a result of growth. This is still true of the preferred alternative. Manufacturing and Industrial Centers are not called out in the discussion of "regional geographies" and are grouped as centers. They are very different from urban centers and are impacted negatively when inappropriate development is allowed. While the Draft Vision 2040 Plan has stronger policy language supporting MICs it is difficult to understand the distinct needs for MICs.

2. Section 5.3 Transportation: The transportation performance targets for transit/bike/walk seem to be really low. In the targets for transit, only slightly more than 1% of the region's employment is accessible by the average household within an allotted time frame (10 min. walk, 20 min. bike, 30 min. transit). For selected mode share -work trips, the split is 74.9% single occupancy vehicle, 11.3% transit, and 6.3% walk/bike. Given the focus on encouraging more compact development, and the need to increase transit use to alleviate congestion and reduce air quality impacts, one expects this to be higher. It also raises questions about how regional transportation funds dedicated to congestion mitigation and air quality improvement are best used.

3. Section 5.4 Air Quality: The first paragraph of this section states that "all of the alternatives would be expected to result in greenhouse gas emissions." Does this mean that all alternatives would increase existing GHG emissions, or that these alternatives will produce GHGs no matter what but not necessarily increase them? There is no discussion about the Seattle Climate Partnership or the Governor's commitment to reducing GHG emissions to 50% below 1990 levels by 2050 and how Vision 2040 supports these initiatives. PM2.5 emissions, which includes diesel particulate matter, is estimated in this section and is expected to be 1.97 tons/day. The SDEIS mentions that there is no emissions budget for PM2.5 because the region has never been designated for non-attainment for PM2.5, but there is no discussion about the U.S. EPA strengthening of the PM2.5 standard or if the preferred alternative will impact (or be impacted by) the region's ability to obtain the new standard. This is an issue that will need to be addressed in PSRC's programming and project selection for federal air quality funds.

R-137-019
R-137-020
R-137-021
R-137-022
R-137-023

R-137-019 VISION 2040 has addressed this issue. See, for example, DP-Action-3 regarding evaluating existing centers and DP-Action-6 regarding the industrial land inventory.

R-137-020 Given the regional scale of the alternatives, and the large variation of conditions among localized areas, the level of detail for the alternatives and the environmental analysis has been conducted at a broad programmatic scale. Localized impacts of growth could vary, but would depend on more specific actions that would be considered and approved through local or project-level processes. Note that VISION 2040 contains actions that address manufacturing/industrial centers as well as an update of PSRC's Industrial Lands Analysis.

R-137-021 Comment noted. Note that as appropriate, a greater level of analysis on transportation effects related to transit and non-motorized modes will be conducted during the Destination 2030 update.

R-137-022 The Final EIS has been updated to address this issue. VISION 2040 has been revised to include the state's goals. See new policy MPP-En-20.

R-137-023 The Final EIS has been updated to address this issue.

4. Section 5.6 Water Quality and Hydrology: The section on Impaired Waters is confusing. Below is suggested language:

State more clearly that the existing land use and shoreline management regulations emphasize redevelopment and location of new development actions in areas designated for industrial use, in contrast to industrial development in "greenfield" locations or areas without underlying industrial land use designations. Existing industrial use areas, generally, coincide with impaired water bodies, due to the legacy of past industrial uses and practices. Under present local, state, and federal decision-making requirements, proposed industrial development must be consistent with up-to-date water quality standards (as well as numerous other land use and environmental controls), including non-degradation requirements. Present day development actions, therefore, provide the means to improve and remedy water quality and environmental conditions, particularly in the case of redevelopment of former industrial use sites, rather than presenting additional degradation of environmental resource values.

R-137-024

Again, thank you for the opportunity to review and comment on the Draft Vision 2040 Plan and DEIS. The Port has been an active partner with the Regional Council in a variety of transportation and economic development forums for many years. We look forward to the completion of the Vision 2040 Plan process which will provide the region a planning guide for growth, public investment and environmental stewardship. If you have any questions, please feel free to call me at 206-728-3778.

Sincerely,

Geraldine H Poor

Geri Poor,
Regional Transportation Manger

cc: John Okamoto
Mike Merritt
Dan Burke
Christine Wolf
Peter Lindsay
Sarah Flagg

R-137-024 The Final EIS addresses this issue.

Port of Seattle

July 31, 2006

Mr. Norman Abbott, SEPA Responsible Official
Vision 2020 Update
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

Subject: Comments on the Vision 2020 Update Draft Environmental Impact Statement (DEIS)

Dear Mr. Abbott:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement of the Vision 2020 Update. The Port of Seattle staff appreciates the magnitude of the effort to update the regional vision, and the opportunities you have afforded for public input and involvement in the development of this update. Our comments reflect our role at the Regional Council both as a long-time member and as an active participant in a variety of transportation and economic development forums.

The Port of Seattle's mission is to create jobs, opportunity and quality of life in King County and the region, through our global perspective, trade relationships, and community and transportation infrastructure partnerships: Last year we served a new record of 29.3 million annual passengers at Seattle-Tacoma International Airport. We own or operate many of the Seattle waterfront cargo terminals and piers, as well as recreational and fishing facilities; last year's growth in container cargo volumes to 2.1 million TEUs (twenty-foot equivalent units) set a new record as well. The effectiveness of our facilities depends on the concomitant public and private sector infrastructure which has developed over time, and which promotes efficient passenger and freight movement.

Today, the Puget Sound Ports of Seattle and Tacoma together rank in the top three US load centers. However, all of our customers operate in a competitive environment, and we must continually enhance our Puget Sound investments to accommodate industry and technology advancements, regional changes, and competitive moves at other ports. Vision 2020 provides the regional planning to guide our region's growth, sustaining our resources and improving utilization of public investment.

Our comments focus on areas of specific interest to the Port's mission and related infrastructure investments: land use, transportation and air quality. How best should regional policies be developed so that these facilities best function to serve the public? The recently developed "National Freight Policy Framework" sets a national agenda for freight mobility and underscores that it is a critical issue for infrastructure funding decisions at the regional and national levels. We believe that the Vision 2020 environmental document must provide more information on how the alternatives impact this sector of the region's economy.

5.2 Land Use

Manufacturing Industrial Centers (MICs) are described under 5.2.1.B (pp.5.2.6-5.2.7), the sub-section on Urban Land. The document states that:

Note: This page of comments does not require a response.

> "The purpose of designating manufacturing/industrial centers is to help protect and preserve areas of intense manufacturing and industrial uses and to provide them with the necessary services and infrastructure to allow these uses to continue."

However, the analysis of Alternatives, outlined under 5.2.2, does not evaluate the impact of the alternatives on these centers, nor provide information on the differences of impacts among the alternatives.

Further, with increasing densities, pressure to allow land uses that are incompatible with manufacturing-industrial activities within or next to the MICs will continue to grow. The region as a whole has an interest in ensuring that the blue-collar, family-wage jobs provided by industry in these centers can be maintained and increased. The recommendations of the Prosperity Partnership, especially for the Logistics and International Trade Cluster, further strengthen this regional interest. Vision 2020 should outline a stronger regional effort in protecting these centers and supporting their continued economic viability and ability to grow.

In summary, the Vision 2020 Update should:

- Include the impacts on MICs in the analysis of alternatives, and the differentiated impacts of the alternatives on the MICs.
- Outline a stronger regional effort in protecting and supporting their continued viability and growth.

5.3 Transportation

5.3.1.5 Freight and Goods System—Description (p.5.3.8)
The freight transportation system description for roadways focuses on the Freight and Goods Transportation System as defined by the State of Washington. A critical component of the system that should be mentioned is NHS Intermodal Connectors, which provide for connectivity between intermodal facilities such as sea and airports and rail yards and the freeway system. To the extent possible, it would useful to recognize that freight is not a mode by itself, but rather an intermodal system where most freight uses more than one mode with multiple transfers as it moves along the logistics chain.

5.3.1.5 Freight and Goods System—Planned improvements (p.5.3.8-5.3.9)
The FAST Corridor projects are a small, albeit important subset of transportation projects supporting freight mobility in the region. Transportation improvements in many other corridors support the movement of freight; and more are needed.

Capacity needs for the rail system, both for freight and passenger operations, are currently being reviewed in a "Statewide Rail Capacity & System Needs Study." The study, to be completed by year-end 2006, will include a statewide rail capacity and system needs analysis, from which we can derive regional rail needs as well. International trade volumes through the Ports of Seattle and Tacoma are increasing every year, and the industry forecasts suggest that growth will continue strong. The intermodal (containers moved on rail) portion of the trade creates significant demand on the rail system. It is important to monitor the findings of the state rail study for regional capacity needs and implications, and to include that information in the regional planning to support future growth in trade volumes.

5.3.1.7 Regional Aviation System—(p.5.3.9)
The Regional Aviation System describes planned investment of Destination 2030, and references Sea-Tac's adopted Master Plan. The Port of Seattle produced its Comprehensive Development Plan in September 2005. It is appropriate to reference that as follows: "Implementation of Sea-Tac's adopted master plan, and subsequent refinements as outlined in the Comprehensive Development Plan, including improvements to passenger terminals and completion of a third runway."

Note: This page of comments does not require a response.

Additionally, the state is embarking on the multi-year Washington State Long-Term Air Transportation Study (LATS). The purpose of LATS is to understand what capacity currently exists and what will be needed to meet future demand for air transportation. WSDOT Aviation will conduct an airport capacity/facility assessment in phase one, and a demand analysis in phase two (complete by July 2007). In the final phase the Governor will appoint an aviation planning council to make recommendations to the Governor, Legislature, and Transportation Commission on how to best meet statewide commercial and general aviation capacity needs (complete by July 2009). While this is a longer timeline than the state rail study, there may be important implications for regional aviation system planning.

5.3.2 Analysis of Alternatives (Long Term Impacts)—Measures (pp. 5.3.11-5.3.12)
The criteria used to measure the impact of the alternatives on the transportation system appear, with the exception of trip time and delay, entirely focused on the movement people rather than freight. Yet, the ability of our region to accommodate the proposed growth in population and employment without negative economic impacts is dependent on adequate freight mobility. At a minimum, average trip time and delay for truck trips should be added to the list of performance measures, especially those trips taking place on the designated Freight and Goods Movement System. In this context, it will be particularly important to determine the impact of the alternatives on truck trips originating or terminating in Manufacturing Industrial Centers or freight intermodal facilities, and those taking place on the Freight and Goods Movement System.

5.3.2.A Impacts Common to All Alternatives (pp. 5.3.12-5.3.14) and
5.3.2.B. Analysis of Each Alternative (pp. 5.3.14-5.3.20)
Again, determining the impact of the alternatives on truck trips originating or terminating in Manufacturing Industrial Centers or freight intermodal facilities, and those taking place on the Freight and Goods Movement System is critical. Without that understanding, it will be difficult to determine which alternative best helps the region retain its blue-collar jobs. It will also be difficult to make infrastructure funding decisions that support needed freight mobility projects.

5.3.4 Potential Mitigation Measures (p. 5.3.21)
The list of potential improvements provided in the draft does not include any provisions for freight mobility. We urge you to include a paragraph and suggest wording like:

- Adoption of a regional policy that ensures preservation of critical freight intermodal sites and corridors to meet long-term regional freight needs. (That is, the Regionally Significant Freight and Goods Transportation System required under state law). This would include a requirement (or at least encouragement) for local jurisdictions to make local transportation plans consistent with the Regionally Significant Freight and Goods Transportation System.

(The above is loosely adapted from Pete Beaulieu's proposal for a regional action strategy.)

5.4. Air Quality

Section 5.4.1.C Affected Environment: C. Current Conditions and Trends (p. 5.4.7)
This section notes that ozone levels are trending upward. If that trend continues the region could fall back into nonattainment status. PSRC and member jurisdictions should work closely with federal, state, and local air agencies to safeguard the region's attainment status as the Vision 2020 +20 final options are selected and resulting plans developed and implemented. In addition to the adverse health and environmental impacts, nonattainment status would make conformity demonstrations and federal approval of projects more difficult.

Note: This page of comments does not require a response.

5.4.2A Analysis of Alternatives Common to All Alternatives (p. 5.4.8-9):
The document states that "Early indicators are that the region will be in violation of this new standard ($PM_{2.5}$)". Is the potential for violation area wide? Are the proposed alternatives likely to have a varied response to $PM_{2.5}$ or is it the same across the alternatives?

5.4.3 Cumulative Effects (p. 5.4.11):
Regarding the second bullet text on EPA reports on marine shipping and the suggestion that "increased level of shipping activity could worsen conditions for the region": please consider that as larger ships are being phased in to the world's shipping fleet, and larger, newer ships are put on routes that call to Puget Sound ports, more cargo will be moved with fewer ships. Also, typically the newer ships use cleaner engines, which would mitigate the direct impacts of increased activity. Please note that currently, we do not know the relative contribution of emissions from shipping activities. The Puget Sound ports and other agencies are cooperating through the Puget Sound Maritime Air Forum to complete an activity-based, 2005-baseline "Puget Sound Maritime Air Emissions Inventory." When it is complete at the end of 2006, detailed data will be available on the emissions contributions of ships.

5.4.4 Potential Mitigation Measures (p. 5.4.12):
The second paragraph references the variety of programs and measures existing in the region. Beyond the above referenced efforts "to quantify Port emissions," we provide the following information on the work of the Forum members to proactively and voluntarily reduce emissions. The Puget Sound Maritime Air Emissions Inventory (EI) is the first major project of the Forum, but the purpose of the Forum is to work collaboratively to:

- Build greater technical understanding of marine air emissions and their impacts on public health and the environment, starting with preparation of a high quality maritime emissions inventory;
- Support implementation of cost effective maritime air pollution control strategies by sharing expertise and resources and building partnerships when activities require the cooperation of multiple organizations for success; and
- Serve as the Puget Sound forum for the ports and vessels track of the West Coast Diesel Emission Reduction Collaborative.

We would be happy to provide a list of the specific projects for your use.

"Other Approaches" This section includes the statement "to reduce cumulative effects from marine sources, the region could seek [stricter] standards for marine vessels through legislation." Currently, the only standards for marine vessels apply to those that are U.S. flagged, which is a very small percentage of the world's shipping fleet. Most marine vessels that carry international cargo are subject to international treaties and protocols administered by the International Maritime Organization (IMO), such as the International Convention for the Prevention of Pollution from Ships (MARPOL). There are no state or local standards for marine vessels. One strategy is to support U.S. ratification of MARPOL Annex VI (International Convention for the Prevention of Air Pollution from Ships) and the establishment of a Sulfur Emissions Control Area (SECA). The Port is working with the shipping industry to encourage voluntary use of cleaner fuels, retrofit strategies, and use of shore power.

7. Discussion of Multi-County Planning Policies

Evaluation of Existing and Revised Multi-county Planning Policies: Development Patterns (pp. 7.7-9)
As indicated in our comments under 5.2, Land Use, we believe that it will be critical for the continued economic health of the region to maintain strong Manufacturing Industrial Centers and minimize the negative impacts of growth such as incompatible land uses. The update to the multi-county planning policies should strengthen the language regarding MICs (RG-1.11) accordingly. MIC-related policies should receive their own subheading. The updated policies should include:

Note: This page of comments does not require a response.

- Protection from incompatible land uses adjacent to MICs
- Provisions ensuring adequate access for freight

Evaluation of Existing and Revised Multi-county Planning Policies: Economy (pp. 7.9-7.10)
In recent years, the decline in manufacturing jobs in the region has led to a decline in family-wage jobs that do not require a college degree. Service and retail industry jobs that are available to residents with a similar education levels tend to be lower paying, and they typically provide less benefits. It will be critical to maintain and, where possible, grow manufacturing-industrial jobs that pay a decent wage, both from a social justice and cost point of view.

For an example of how another MPO is addressing this issue please see SCAG's analysis of the value of port-related jobs in addressing these issues in Southern California:

http://www.scag.ca.gov/goodsmove/pdf/GoodsmovePaper0905.pdf

Evaluation of Existing and Revised Multi-county Planning Policies: Transportation (pp. 7.10-7.12)
Both the existing policies, and the direction for editing existing policies, are focused almost exclusively on the movement of people. With increasing demand on the system, is will be increasingly important to make adequate provisions for freight mobility. Freight has different needs, and it is not a mode. The policy update should contain specific provisions for protecting and enhancing the capacity and functionality of existing truck routes and freight intermodal facilities that are part of the regional system. This should include provisions to close gaps in that system. Strategies and policies should also include "increasing transportation capacity" to accommodate growth in international trade.

Appendix F Existing Multi-County Planning Policies

Transportation (pp F.8-F.10)
The following new "policy" and additional "specific policies" address the nature of our comments above. We recognize that the existing policies are being amended, but provide these in the format of Appendix F.

Optimize and manage the use of transportation facilities and services.
- Give priority to trucks on the existing system of major truck routes to help reduce truck traffic on other facilities

Invest in transportation improvements that support land use objectives.
- Provide adequate truck access to Manufacturing-Industrial Centers, sea-and airport facilities, and intermodal rail yards.

Selectively expand transportation capacity, offering greater mobility options. *Selectively increase*
- Complete a regional system of truck routes linking Manufacturing-Industrial Centers and freight intermodal facilities.

Implement a transportation system that supports the economic vitality of the region, including *global competitiveness, productivity, and efficiency.*
- Provide reliable freight access to intermodal facilities serving international trade, such as sea-and airports and intermodal rail yards.
- Enhance the existing system of major truck routes to provide reliable freight mobility between/among intermodal freight facilities and Manufacturing-Industrial Centers
- Manage the transportation system to enhance the reliability and efficiency of freight movement in the region
- Adopt a regional transportation policy that ensures preservation of critical freight intermodal sites and corridors to meet long-term regional freight needs. (That is, the Regionally Significant Freight and Goods Transportation System required under state law). Include a requirement (or at least

Note: This page of comments does not require a response.

Mr. Norman Abbott
Page 6 of 6

encouragement) for local jurisdictions to make local transportation plans consistent with the Regionally Significant Freight and Goods Transportation System.

Thank you again for your leadership on this important regional effort. Please call me at 206-728-3778 should you wish to have any questions regarding these comments.

Sincerely,

Geraldine Poor, Regional Transportation Manager

Cc: Okamoto, Merritt, Wolf, Leavitt, S. Jones

Note: This page of comments does not require a response.

pscleanair.org
Puget Sound Clean Air Agency

Working together for clean air

R-168

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1904 Third Avenue
Suite 105
Seattle, WA 98101-3317

September 10, 2007

Norm Abbott
SEPA Responsible Official
Puget Sound Regional Council
1011 Western Ave. Suite 500
Seattle, WA 98104-1035

Re: Draft VISION 2040

Dear Mr. Abbott,

Thank you for the opportunity to comment on the draft VISION 2040. The VISION 2040 focus on mixed-use centers provides more choice for our residents, especially those who wish to walk, bike and ride transit helps improve our air quality and protect our climate. R-168-001

We also appreciate the increased attention to air quality and global climate protection in the overall plan. We concur with PSRC's statement that "Climate change has the potential to affect almost every other issue identified in VISION 2040," given the devastating effects climate change could have on our region. R-168-002

Similarly, many of our elected officials, including both King County Executive Ron Sims and Seattle Mayor Greg Nickels, view climate protection as one of the most important issues of our time, and have set aggressive greenhouse gas (GHG) reduction targets. In addition, the Governor and Legislature have set clear goals for greenhouse gas reductions that should be considered in finalizing VISION 2040.

Given that our transportation sector contributes nearly half the GHG pollution for our region, our transportation planning decisions have never been more compelling. Our current transportation system, while multi modal, is heavily skewed toward the automobile and the single-occupant vehicle in particular. R-168-003

In light of these issues, we recommend three major improvements for the plan: R-168-004

- Incorporate current research demonstrating the relationship between land use and air pollution, particularly greenhouse gases. This research shows that land use patterns that support and provide easy access to transit or pedestrian options will reduce air pollution and greenhouse gases by reducing vehicle miles traveled,

EXECUTIVE DIRECTOR
Dennis J. McLerran

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MEMBER AT LARGE
Marina Cofer-Wildsmith

R-168-001 Concur.

R-168-002 VISION 2040 has been revised to address this issue. See the new policy MPP-En-20 in the final document that addresses RCW 80.80.020.

R-168-003 Comment noted. See additional discussions of climate change in the Regional Growth Strategy section, framework, and other parts of the document.

R-168-004 VISION 2040 has been revised to address this issue. This concept is noted in the narrative discussion.

- Using this information, reduce strategies that focus on roadway expansion and increased capacity and increase strategies that focus on increased access to multi-modal transportation, and
- Ensure that all our citizens have quality access to a variety of transportation choices for moving around the Puget Sound region.

To reduce air pollution and GHGs, we must provide better solutions to our transportation needs. We look forward to working with you on these important issues. If you have any questions or desire additional information, you may contact Paul Carr, 206-689-4085, paulc@pscleanair.org of my staff.

R-168-005
R-168-006
Continuation of R-168-003

Sincerely,

Dennis McLerran
Executive Director

Attachment

jwc

R-168-005 VISION 2040 has been revised to address this issue, with added narrative related to linking land use and transportation. The Transportation section now has a subsection entitled "Sustainable Transportation" that includes four policies. Also, the Destination 2030 update will provide an additional opportunity to further address this issue.

R-168-006 VISION 2040 has been revised to address this issue, with added narrative related to multimodal transportation. Also, the Destination 2030 update will provide an additional opportunity to further address this issue.

R-168-003 (continued) See initial response to this comment.

DETAILED COMMENTS ON VISION 2040

p. 5 An Environmental Framework: Add reference to global climate, i.e. "The way land is developed affects global climate, and air and water quality." R-168-007

P. 7 Natural Ecosystem Conditions illustration: At the top of the illustration add a red bulleted highlight about the air, e.g. Regional and Local Air; Clean air contributes to healthy forests, normal snow pack, normal rain fall and healthy habitat. R-168-008

p. 9 Human Impacts to Ecosystem Conditions illustration: Move the red bullet titled "Air Pollution and Climate Change" to the top of the illustration. Note also that climate change impacts habitat and sprawl and imperviousness contribute to climate change. R-168-009 R-168-010

p. 11 Ways to Improve Ecosystem Conditions illustration: At the top of the illustration add a red bulleted highlight about reducing air pollution and protecting global climate. In the "Transit" narrative add the clause "green house gases. In the "Non-motorized Transportation" narrative add the phrase "green house gases". R-168-011 R-168-012 R-168-013

p. 24 Vision 2040 Policy Approach: Transportation contributes to nearly half of the air pollution and green house gas emissions in the region. The 3rd full paragraph in the 2nd column should include a comment that the transportation provisions contribute to reducing air pollution and green house gas emissions. R-168-014

p. 27 ENVIRONMENT Overarching Goal: Add a reference to the global ecosystem, e.g. "Planning at all levels should consider the impacts of land use, development patterns and transportation on the regional and global ecosystems. R-168-015

p. 30 Earth and Habitat; first paragraph column one: Include a reference to global climate because critical areas also have beneficial functions and values related to global climate. R-168-016

p. 32 Air Quality: Increase the discussion on the relationship between land use, and air quality, e.g. sprawl contributes to more driving resulting in more harmful emissions. Also a good location to reiterate that VISION 2040 guidance for mixed use centers with improved accessibility and mobility, especially for walking, biking and transit has air quality and climate protection benefits because it can help to reduce the growth in VMT. R-168-017 R-168-018

p. 33 Climate change: Same comments as for air quality on p. 32. R-168-019

p. 33 MPP-En19: Replace the word "alternative" with "cleaner" and clarify that it is community design and land use patterns that reduce VMT. R-168-020

p. 34 MPP-En 20: Clarify that it is transportation activity rather than transportation facilities. R-168-021

p. 35 Regional Approach 1st paragraph: Could also note that the VISION 2040 guidance also reduces air pollution and supports climate protection. R-168-022

3

R-168-007 VISION 2040 now includes this edit.

R-168-008 VISION 2040 has been revised to include this edit.

R-168-009 VISION 2040 has been revised to address this issue.

R-168-010 VISION 2040 has been revised to include this edit.

R-168-011 VISION 2040 has been revised to include this edit.

R-168-012 VISION 2040 has been revised to include this edit.

R-168-013 VISION 2040 has been revised to include this edit.

R-168-014 VISION 2040 has been revised to address this issue. The narrative discussion will include a reference to air pollution and gas emissions.

R-168-015 VISION 2040 has been revised to address this issue. The word "regional" was struck and was replaced by the word "ecosystem."

R-168-016 VISION 2040 has been revised to address this issue.

R-168-017 VISION 2040 has been revised to address this issue.

R-168-018 VISION 2040 has been revised to address this issue.

R-168-019 VISION 2040 has been revised to address this issue. A policy has been added to address the state initiatives on climate change and the reduction of greenhouse gases. See MPP-En-20.

R-168-020 VISION 2040 has been revised to include this edit.

R-168-021 VISION 2040 has been revised to address this issue. The word "facilities" was replaced by the word "activities."

R-168-022 VISION 2040 has been revised to address this issue.

p. 36 Agricultural Lands 2nd paragraph: Could also note that certain farming practices contribute to air pollution and can result in exposure problems that should be avoided.

R-168-023 VISION 2040 has been revised to address this issue.

p. 36 Mineral Lands: Same comment as Agricultural Lands

R-168-024 VISION 2040 has been revised to address this issue.

p. 37 Urban Lands 2nd paragraph: The pattern of low-density development has also contributed to emission of greenhouse gases, and to the persistence of air pollution even though vehicles emit significantly less than they did thirty years ago.

R-168-025 VISION 2040 has been revised to address this issue.

P. 39 Urban Regional Geographies and Their Centers: Highlight that the centers approach also has benefits for reducing transportation related air pollution and green house gas emissions. The second paragraph should note that these air quality and climate benefits depend upon a balanced high-efficiency transportation system.

R-168-026 VISION 2040 has been revised to address this issue.

R-168-027 VISION 2040 has been revised to address this issue.

p. 46 Rural lands 2nd paragraph: Provide a description of the pollution that could occur, e.g. air & water pollution, green house gases.

R-168-028 VISION 2040 has been revised to address this issue.

p. 48 Part II Housing Affordability and Jobs-Housing Balance: Long commutes contribute to air pollution and green house gas emissions. Shift the focus to stressing that increasing or promoting travel by transit, walking or biking serves to reduce air pollution and green house gases as well as serving as a way of balancing jobs and housing.

R-168-029 VISION 2040 has been revised to address this issue.

p. 54 Incompatible Land Uses: Exposure to harmful air emissions can also be a negative impact of incompatible land uses.

R-168-030 Comment noted.

p. 63 Transportation Overarching Goal: It is not sufficient to have a highly efficient multimodal transportation system if it is still dominated by SOV oriented facilities. The goal should be for a transportation system that is sustainable for 2040 and provides real mode choices

R-168-031 The goal was revised to address clean transportation and health.

p. 64 Regional Approach 1st column 1st paragraph: Change the last sentence by changing the last two clauses as follows: ...provide a more complete and efficient network of public rights-of-way and transportation facilities, and, in general, create an urban environment that promotes walking, biking and transit use.

R-168-032 VISION 2040 has been revised to address this issue.

p. 67 MPP-T-6: The policy is unclear, particularly the phrase "Provide mobility to". It could mean ramps, free bus passes or wheel chairs. A different phrase could clarify the policy, e.g. "Ensure mobility choices for".

R-168-033 VISION 2040 has been revised to address this issue.

p. 68 Goal: Same comment as for the Overarching Goal for Transportation on p. 63..

R-168-034 This idea was considered in the VISION 2040 process and the existing goal was retained, while the narrative was expanded.

p. 68 MPP-T-7*: Same as preceding comment.

p. 68 MPP-T-10: Add a clause that includes increase mode choice and reduce environmental impact.

R-168-035 The idea was considered and the existing language was retained.

p. 68 MPP-T-11*: Adding a phrase about improving regional air quality would strengthen the effort to retain and attract industries and skilled workers, particularly in the global economy.

R-168-036 The idea was considered and the existing language was retained.

4

p. 68 MPP-T-13*: The policy could be strengthened by replacing the word, "accommodate" with the word, "incorporate" and promoting reliable and convenient connections. R-168-037

p. 68 MPP-T-15*: Add a clause to the effect of "and degradation of the environment" R-168-038

p. 68 MPP-T-17: Change the word "deploy" to "employ". R-168-039

p. 68 MPP-T-18: The policy could be strengthened by expanding it to cover operations as well as design, e.g. "Design and operate transportation facilities", and clarifying the phrase "to fit within". The words "improve" or "complement" may provide better guidance than "to fit within". R-168-040

p. 68 MPP-T-19: It is not clear what applying "urban design principles" is intended to accomplish. For example, are the urban design principles intended to result in transportation programs and projects that (a) support or complement the centers and transit station areas or (b) are transit oriented or (c) are architectural statements. R-168-041

p. 70 Greater Options and Mobility: The current narrative is too focused on increasing capacity. Recommend moving the last paragraph in the section, i.e. "VISION 2040 calls for ...investments." to the start of the section and increasing the discussion of the greater options and mode choices that can be provided. R-168-042

p. 70 Greater Options and Mobility, 1st column, 2nd paragraph, 2nd sentence: Add a clause to ensure that the environmental strategies are also supported. R-168-043

p. 70 Greater Options and Mobility, 1st column 2nd paragraph: All transportation projects and programs need to do more than "consider" impacts. They need to address and mitigate impacts to the natural environment and communities and support reducing green house gases. R-168-044

p. 71 MPP-T-21: As written, the policy will fall short of offering truly greater options, mobility, and access; nor will it produce the most effective and efficient transportation system because it focuses on capacity expansion rather than capacity improvement. A policy that provides guidance for improving capacity encompasses system management and demand management as well as system expansion. Improving capacity also encompasses technology and market forces while the existing policy continues a focus on more lanes and larger facilities. Expanded capacity will not improve our transportation system if the system remains overwhelmingly SOV oriented, inter modal connections are not improved, facilities do not include reliable and convenient sidewalks and transit service, and both the system and the facilities are not designed to be an integral part of the community as well as designed to move people and goods. The policy should also consider the "long term" net benefits rather than short term net benefits because many of the dis-benefits such as increased emissions from congestion occur when use exceeds capacity. Any consideration of net benefits should also include analysis of green house gas emissions and impact on global climate. We recommend replacing the word "expand" with the word "improve" in the policy; adding the phrase "long term" in front of the word "net"; and adding "communities" before the phrase "and the environment". R-168-045

5

R-168-037 VISION 2040 has been revised to include this edit.

R-168-038 This idea was considered in the VISION 2040 process and the existing language was retained.

R-168-039 This policy has been split into three separate policies. The word "deploy" is no longer used.

R-168-040 The idea was considered and the existing language was retained.

R-168-041 Comment noted.

R-168-042 The narrative for this section has been revised.

R-168-043 See response to R-168-042.

R-168-044 VISION 2040 has been revised with clearer provisions related to transportation and the environment.

R-168-045 While this specific change in words was not included as written, VISION 2040 was revised to address this issue.

p. 71 MPP-T-22: The policy needs to be strengthened by requiring a commitment from the affected jurisdictions to keep the appropriate zoning in place through the design life of the roadway.

R-168-046

p. 71 MPP-T-23*: The policy might be improved by adding the phrase "and within" after the word "along". Many of the existing corridors have inadequate sidewalk systems within the system and safe pedestrian access to transit is important to increasing transit ridership.

R-168-047

p. 71 MPP-T-27*: This policy could be clarified by replacing the word "Integrate" with the words "Locate, design, provide and operate".

R-168-048

p. 71 Overview of Transportation Actions and Measures: A wider range of measures should be employed for monitoring efforts in this area. Possible additional measures for the item (1) report include number of jurisdictions that have adopted "complete street" or "green street" requirements, percentage of housing units or people that have sidewalk or pedestrian paths adjacent to their residence, percentage of streets that have sidewalks within a certain distance of a transit stop, e.g. a quarter mile, percentage of transportation investments that serve or are surrounded by transit-supportive densities and land uses, and the horizontal and vertical distance of the connections between transportation modes, e.g. a light rail station and the nearest bus stop. Possible additional measures for the item (2) report include number and type of rezones adjacent and subsequent to rural roadway capacity expansion projects, number and type of building permits issued/completed along corridors connecting centers, and frequency and availability of transit service in the corridor. Possible additional measures for the item (3) report include number of trips, and vehicle occupancy rates. Possible additional measures for the item (4) report include amount of fuel consumed and green house gases emitted.

R-168-049

R-168-050

R-168-051

R-168-052

R-168-049 VISION 2040 has been revised to clarify that the monitoring program included in the document is a starting point. An action has been added that calls for future work to refine and improve the program.

R-168-050 VISION 2040 has been revised to clarify that the monitoring program included in the document is a starting point. An action has been added that calls for future work to refine and improve the program.

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R-168-052 VISION 2040 has been revised to clarify that the monitoring program included in the document is a starting point. An action has been added that calls for future work to refine and improve the program.

p. 77 Energy Supply 3rd paragraph: Greater energy efficiency also has climate protection benefits and in many cases air toxic and criteria pollutant benefits.

R-168-053

R-168-053 VISION 2040 was revised to address this issue.

p. 84 Measures and Monitoring 4th paragraph: While a high level perspective is appropriate for achieving a broad view of the state of the region successful implementation and performance may be best achieved by employing detailed monitoring measures that can provide an explanation for why a goal has not been achieved. For example a high level monitoring measure that only examined the mode split or the ridership totals will not provide any indication of why multi modal or transit goals were not achieved. If people can't safely and easily walk from their residence to a transit stop they may not use the new improved transit stop or partake of the more frequent service. A more detailed performance measure that assessed the completeness of the pedestrian system serving a bus stop could provide an indication why a goal was not being achieved.

R-168-054

R-168-054 VISION 2040 has been revised to clarify that the monitoring program included in the document is a starting point. An action has been added that calls for future work to refine and improve the program.

Comment Letter

Response to Comment Letter

R-102

September 6, 2007

Mr. Mike Lonergan, Chair
Growth Management Policy Board
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, Washington 98104

Subject: **Comments on the Draft VISION 2040 Document from the Regional Staff Committee**

Dear Mr. Lonergan:

The Regional Staff Committee met on August 16, 2007, and reviewed the draft VISION 2040 document that was released in July for public comment. The Committee identified the following issues for consideration by the Regional Council's policy boards as they consider edits and revisions to the draft document this fall. (Note: Although, the Committee completed its review of the majority of the document, time did not allow us to develop comments for the Public Services and Implementation sections of the document.)

The Committee's comments are listed sequentially, following the order of content in the draft VISION 2040 document.

VISION 2040 Vision Statement

#1. (Page 1) The statement should be supplemented with a vision description that discusses what the region will be like in the year 2040. It should address, for example, what communities, housing, farmland, local production of food look like in 2040.

R-102-001

Introduction

#2. (Pages 3 and 4) Address here (or in the introductory portion of the multicounty policies chapter) that regional issues require regional solutions.

R-102-002

#3. (Pages 3 and 4) Consider emphasizing the importance of the *Regional Growth Strategy* and *Multicounty Planning Policies*.

R-102-003

Environmental Framework

#4. (Pages 5 to 12) There needs to be more distinction between the *Environmental Framework* and the section with the *Environment* Multicounty Planning Policies.

R-102-004

#5. (Page 5) The *Environmental Framework* chapter should be presented more as a theme chapter for the document. The current title "*Environmental Framework*" is ambiguous. Consider other titles for this chapter, such as:

R-102-005

(Comment continues on following page)

R-102-001 VISION 2040 now includes a list of overarching goals following the vision statement.

R-102-002 VISION 2040 has been revised to address this issue in Part II: Introduction and elsewhere.

R-102-003 The narrative of Part II: Introduction has been revised to discuss the Regional Growth Strategy and the multicounty planning policies.

R-102-004 VISION 2040 has been revised to strengthen the Environmental Framework by expanding the discussion on sustainability and also by distinguishing the Framework from the Environment policy section. Repetitive text in the Environment policy section has been removed.

Mr. Mike Lonergan, Chair
Growth Management Policy Board
September 6, 2007
Page 2

- *Context for VISION 2040*
- *Framework for VISION 2040*
- *Natural Environment and Sustainability*
- *Sustainable Environment Framework*
- *Sustainable Focus*
- *Sustainable Foundation*
- *Sustaining Our Quality of Life*

#6. (Pages 5 to 12) The Framework should focus more on sustainability and quality of life. It should take on a more proactive tone regarding natural systems and our challenges and opportunities.

#7. In the first paragraph (page 5), add a reference to climate change, where air and water quality are mentioned.

#8. In the second paragraph (page 5), revise the wording of the first sentence to read: "*In recent decades, it has become clear that public health, the economy, and the natural environment are all closely linked.*"

#9. (Pages 5 to 12, and elsewhere) Be attentive to when the words "protect" and "restore" are used. When using the word "restore" be clear about what condition an area is being restored to; for example, is the restoration to a good functional condition rather than a pristine state? "Protect" should refer to keeping an area in good shape, without doing harm.

#10. Consider supplementing the sketches on pages 7, 9, and 11.

#11. The section titled "*Past Practices Have Affected the Environment*" is too sugarcoated and weak (page 8). There should be a more explicit and detailed discussion about how the environment has been degraded.

#12. Add captions to the images of the regional footprint (page 8). Consider supplementing with additional images of what would the regional footprint would look like without the growth strategy. Consider adding an image showing the conceptual regional footprint for 2040.

#13. The subsection titled "*Restore and Sustain the Environment*" (page 10) should include more successes and new challenges, drawing from both regional and local efforts as examples.

#14. The conclusion of the Framework should be more of a "call to arms" (page 12). The *Challenges and Opportunities* should also connect with other regional environmental and economic efforts.

Continuation of R-102-005
R-102-006
R-102-007
R-102-008
R-102-009
R-102-010
R-102-011
R-102-012
R-102-013
R-102-014

R-102-005 VISION 2040 has been revised to address this issue in the Environment section. The concept of sustainability has been brought forward in the Environmental Framework and then woven throughout VISION 2040 as an important thread tying together the environment, land use, transportation, and economy as interrelated components that shape our quality of life. The title of the Framework has been revised to include the word "sustainable."

R-102-006 See response to R-102-005.

R-102-007 VISION 2040 has been revised to address this issue.

R-102-008 VISION 2040 has been revised to address this issue.

R-102-009 VISION 2040 has been revised to address this issue and includes definitions as needed.

R-102-010 VISION 2040 graphics, including charts, maps, tables, and illustrations have been reworked for accuracy and readability.

R-102-011 VISION 2040 has been revised to address this issue.

R-102-012 VISION 2040 graphics, including charts, maps, tables, and illustrations have been reworked for accuracy and readability.

R-102-013 VISION 2040 has been revised to address this issue.

R-102-014 VISION 2040 has been revised to strengthen the Environmental Framework.

#15. Incorporate into the discussion (page 12, 3rd paragraph) references to healthy communities and overall quality of life. R-102-015

R-102-015 VISION 2040 has been revised to address this issue. VISION 2040 now makes references to public health as an important component in community well-being and as a viable aspect of regional planning. The topic has been expanded in the narrative and is included in policy language throughout VISION 2040.

Regional Strategy for Accommodating Growth

#16. Replace the word "concrete" with "meaningful" (page 13, final bullet) R-102-016

R-102-016 VISION 2040 has been revised to include this edit.

#17. (Pages 15 to 18) Consider revising the maps of regional geographies to make them more understandable. R-102-017

R-102-017 VISION 2040 has been revised to address this issue. The charts, maps, tables, illustrations, and other graphics have been reworked for accuracy and readability.

#18. Replace the term "designated Core Centers" with "designated centers" (page 15, 1st paragraph under Core Cities.) R-102-018

R-102-018 VISION 2040 has been revised to include this edit.

#19. Explain why 22,500 activity units is the break point between Larger Cities and Small Cities in the classification of regional geographies (page 16). R-102-019

R-102-019 VISION 2040 has been revised to address this issue.

#20. Clarify that there is a different magnitude of distribution between Larger Cities and Smaller Cities – 11% divided among 13 cities versus 9% divided among 51 (page 16). R-102-020

R-102-020 VISION 2040 has been revised to address this issue.

#21. Note on the graph titled "Population Growth by Regional Geography and County 2000-2040" (page 19) that it is assumed that all of the unincorporated urban growth area will annex to or incorporate as a city by 2040 (as stated on page 17, 1st paragraph, final sentence). Add notation that 70% of that number are already affiliated with existing cities in potential annexation areas. R-102-021

R-102-021 VISION 2040 has been revised to address this issue.

#22. Consider other charts or additional charts for depicting population and employment growth (pages 19 and 20). R-102-022

R-102-022 VISION 2040 has been revised to address this issue.

#23. Move the subsection titled "*How Will the Regional Growth Strategy Be Used*" to the first part of the growth strategy chapter (currently on page 20). Move the map on page 21 forward in the chapter as well. R-102-023

R-102-023 VISION 2040 has been revised to address this issue.

#24. Replace the phrase "intended to guide" with "intended to guide and coordinate" on page 20. R-102-024

R-102-024 VISION 2040 has been revised to include this edit.

#25. On the Regional Growth Strategy map (page 21) add an additional dot to the legend for the metropolitan centers. In the next version of the map, change the dot for Overlake to show its change in status to a regional growth center. Add a note in the legend about the source of information for the location of transit lines. Consider making the transit lines more generalized. Better distinguish between urban and rural – perhaps add a line showing the urban growth area boundary. R-102-025

R-102-025 The charts, maps, tables, illustrations, and other graphics have been reworked for accuracy and readability.

Multicounty Planning Policies

#26. Define the four-part framework of goals, policies, actions, and measures (page 25). R-102-026

#27. In the "*Overview of Actions and Measures*" for each of the policy topics, separate measures from actions into two distinct subsections – use a separate subtitle for the measures (see pages 34, 47, 51, 56, 62, 71, 79). R-102-027

#28. (Page 25) Separate the *Administrative Multicounty Planning Policies* subsection from the introductory portion. Consider moving these policies to the very end of the policy chapter. R-102-028

#29. (Page 25) Consider another name for this set of policies other than "*administrative.*" Some suggestions include: R-102-029

- *Coordination for Multicounty Planning Policies*
- *Context for Multicounty Planning Policies*
- *Governance Multicounty Planning Policies*

#30. (Page 25 and throughout) Elevate the issue of collaboration with the tribes in the VISION update. R-102-030

#31. (Page 25) Add more discussion about the countywide planning policies with regard to Policy A-2. Note that the countywide policies need to be based on the regional context and also serve as guidance for local jurisdictions. R-102-031

#32. (Page 25) Regarding Policy A-2, reference the implementation sections and actions that relate to this policy. R-102-032

Environment

#33. Add "environmental health" (or "public health") to the overarching goal (page 27). R-102-033

#34. Review the discussion of Puget Sound Partnership in the VISION (beyond sidebar on page 31). R-102-034

#35. Change "should" to "will" in the goal on page 32 – to parallel language in other goals. R-102-035

#36. (Page 32) Provide additional context on restoration of shorelines in MPP-En-15. Consider adding context in the text, or adding a sidebar that discusses shoreline issues and port operations. R-102-036

#37. Climate change should be more prominent as a lead-off topic in the VISION (see page 33). R-102-037

R-102-026 VISION 2040 has expanded the narrative description of the relationship among goals, policies, actions, and measures.

R-102-027 VISION 2040 has brought the actions directly into each policy section. The measures are now in Part IV: Implementation.

R-102-028 These policies have been separated from the preceding Overview.

R-102-029 The Administrative policy section has been renamed General Multicounty Planning Policies and remains at the beginning of the policy document.

R-102-030 Comment noted.

R-102-031 VISION 2040 has been revised to address this issue. The Overview introducing the Multicounty Planning Policies has been expanded to discuss the role of countywide planning policies and their relationship to local plans.

R-102-032 VISION 2040 has been revised.

R-102-033 VISION 2040 has been revised to address this issue. The overarching goal includes a statement that the health of the region's residents is tied to the health of the environment.

R-102-034 Comment noted.

R-102-035 VISION 2040 has been revised to address this issue. The word "should" has been replaced by "will."

R-102-036 VISION 2040 has been revised to address this issue.

R-102-037 VISION 2040 has been revised to address this issue. A new policy addresses the state initiatives on climate change and the reduction of greenhouse gases. There is also a new sidebar with cross references to the various climate change provisions in VISION 2040.

#38. Expand the discussion regarding the relationship between land use, air quality and climate change (pages 32 and 33). R-102-038

R-102-038 VISION 2040 has been revised to address this issue.

Development Patterns

#39. Change "will have focused" to "will focus" in the Overarching Goal (page 35) – to parallel language in other goals. R-102-039

R-102-039 VISION 2040 has been revised to include this edit.

#40. Change "water pollution" to "water and air pollution" on page 36, 8th paragraph (2nd paragraph under subsection titled "*Agricultural Lands*"). R-102-040

R-102-040 VISION 2040 has been revised to address this issue.

#41. Add "fugitive dust" to the list of issues discussed under "*Mineral Lands*" (page 36). R-102-041

R-102-041 VISION 2040 has been revised to address this issue.

#42. Regarding policies MPP-DP-4 and MPP-DP-5 (page 37), the emphasis should be placed on ensuring that resource lands are not adversely impacted by uses on adjacent non-resource lands. R-102-042

R-102-042 VISION 2040 has been revised to address this issue. These policies have been revised and combined.

#43. Policy DP-7 as written reads more like an action than a policy (page 39). R-102-043

R-102-043 Comment noted.

#44. Revise the Designated Regional Centers map (page 42) to (1) include Overlake as a regional growth center, (2) use consistent terms for the names of the centers (i.e., some have "downtown" included in their names, while others do not), and (3) correct the urban growth area south of Lake Tapps. R-102-044

R-102-044 VISION 2040 has been revised to address this issue.

#45. Consider revising and simplifying DP-28 (page 46). As currently written it has too many causes and is hard to understand. R-102-045

R-102-045 VISION 2040 has been revised to address this issue.

#46. Expand the discussion of housing in the region to discuss what other agencies and groups are doing, such as *A Regional Coalition for Housing* (ARCH) (page 50). This expanded discussion could be in the narrative, sidebars, or both. R-102-046

R-102-046 VISION 2040 has been revised to address this issue. A new sidebar describes ARCH and 10-year homeless needs planning.

Transportation

#47. Replace the word "deploy" in T-17 (page 68). It is an awkward term that is not easily understood. One option would be to substitute the word "employ." R-102-047

R-102-047 VISION 2040 has been revised to address this issue. This policy is now three separate policies and has been relocated to the first set of transportation policies.

#48. (Page 68 or 71) Consider adding a sidebar about the transportation conversion project for the Burlington Northern/Santa Fe alignment in eastern King and Snohomish counties. It is an example of our changing transportation system to meet future needs. R-102-048

R-102-048 The idea was considered and the existing language was retained.

#49. Clarify that T-22 (page 71) does not propose new roads in rural areas. Ensure that T-22 and DP-29 (page 47) are consistent with one another. R-102-049

R-102-049 VISION 2040 has been revised to address this issue. This policy has been rewritten to be clearer about the conditions under which new or expanded roads in rural areas or resource lands are appropriate.

#50. (Page 70 and 71) Add policy language and narrative to address congestion pricing.

R-102-050

Thank you for your consideration of these comments. If you have questions or would like additional information on our discussion of the draft VISION 2040 document, please contact me at 425-745-1891or e-mail *bill@cityofmillcreek.com*.

Sincerely,

Bill Trimm, AICP
Chair, Regional Staff Committee

R-102-050 VISION 2040 has been revised to address this issue. Also there will be additional opportunities to address this issue during the Destination 2030 update.

R-167

Snohomish County Tomorrow

A GROWTH MANAGEMENT ADVISORY COUNCIL

September 5, 2007

Norman Abbott, Ph.D.
Director of Growth Management Planning
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104

RE: Comments from the Snohomish County Tomorrow Organization on the Draft Multicounty Planning Policies

Dear Dr. Abbott:

Snohomish County Tomorrow (SCT) supports the efforts of the Puget Sound Regional Council (PSRC) in revising the Multicounty Planning Policies (MPPs) and the regional growth strategy as part of the "Vision 2040" update to "Vision 2020." SCT is comprised of elected officials and staff from Snohomish County and all the cities, towns, and tribes in the county. We take your request for input as a serious responsibility and we appreciate the opportunity to be involved.

SCT reviewed the February 1, 2007 draft MPPs and associated documents provided by PSRC. The comments in this letter are the result of a collaborative effort of SCT and its member organizations, and it establishes SCT and its members as parties of record. SCT members may provide additional comments representing their own specific concerns.

We appreciated Executive Director Bob Drewel's attendance at the Steering Committee meeting on July 25, 2007 to discuss the update with SCT members. We also appreciate the continued assistance that PSRC staff members provide to our organizations throughout this update process.

As an overarching comment on the MPPs, SCT would encourage PSRC to reword the policies with stronger action verbs, and to remove ambiguous words or phrases with the goal of developing a document with policies that can be put into action.

The following comments address specific areas of mutual concern in the 'Recommended Preferred Alternative for a Regional Growth Strategy' and the Multicounty Planning Policies.

General Comments on the Regional Growth Strategy

Snohomish County Administration Building, M/S 604, 3000 Rockefeller Avenue, Everett, WA 98201-4046
425-388-3311

(Comment continues on following page)

R-167-001

R-167-002

R-167-003

R-167-001 Thank you.

R-167-002 VISION 2040 has been revised to address this issue. Many of the policies have been reworded and strengthened.

1.	The document appears to recognize the importance of the jobs-housing balance. The final document could state this balance even more strongly.	*Growth Strategy (GS) narrative and tables*
2.	The final document should more clearly define 'centers', clearly distinguishing between types of major centers and major employment centers, and the role the different types of centers are expected to plan in implementing the regional vision.	*GS narrative*
3.	The document would do well to set the context for the MPPs and the vision for the region by defining in an introduction how the proposed growth strategy in Vision 2040 will cause growth in our region to differ from growth patterns elsewhere in the nation.	*GS narrative*
4.	We recognize the growth targets show a slowing rate of rural growth.	*GS tables*
5.	The Preferred Growth Alternative should clearly show the difference in capacity needed to accommodate population growth between 2025 planning and the 2040 forecast.	*GS tables*
6.	Emphasize sustainability as a common thread that could pull all the sections together.	*All chapters*
7.	Transportation should not be presented as the sole culprit in environmental impact. Other factors, including development and land use patterns should also be mentioned.	*Various places*
"The Environment" MPPs		
8.	Revise the last sentence of policy EN-3 to read, "Reduce the impacts of transportation, land use patterns and other activities on air quality and climate change."	*EN-3*
9.	In the Climate Change policies EN-19 and EN-22, note the need to reduce Vehicle Miles Traveled (VMT) to make a significant positive impact.	*EN-19 and EN-22*
"Development Patterns" MPPs		
10.	A policy in the Resource Lands section should note the importance of farmland for commercial production and markets for local produce, which would support the principles of sustainability.	*Resource Lands section*
11.	In order to allow for the adjustments of urban growth areas described in policy DP-6, rephrase the Urban Growth Areas Goal statement to read, "The region will promote the efficient use of land, prevent urbanization of rural and resource lands except where they are brought into urban growth areas, and provide for the efficient delivery of services within designated urban growth areas."	*Urban Growth Areas section*
12.	SCT was unable to come to a consensus for or against DP-26. Several cities have expressed concerns about the potential impacts of fully contained communities on their cities and agree with DP-26 that these types of development should be "avoided."	*DP-26*

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425-388-3311

(Comment continues on following page)

R-167-003 Continuation of R-167-003
R-167-004
R-167-005
R-167-006
R-167-007
R-167-008
R-167-009
R-167-010
R-167-011 & R-167-012
R-167-013
R-167-014
R-167-015

R-167-003 Concur. The narrative in Part II: Regional Growth Strategy has been revised to address this issue. See also the new policy in the Economy policy section.

R-167-004 VISION 2040 has been revised to address this issue. The narrative and table describing centers is now clearer, the goal for other centers is more specific, and the policies regarding regional growth centers, manufacturing/industrial centers, and other centers have been clarified with regard to funding prioritization.

R-167-005 VISION 2040 has been revised to address compact development patterns more clearly and the benefits they provide versus past growth patterns in this region and elsewhere in the country.

R-167-006 Comment noted.

R-167-007 Capacity is dealt with at the local jurisdictional level through the buildable lands analysis.

R-167-008 VISION 2040 has been revised to address this issue. The concept of sustainability is now woven throughout VISION 2040 as an important thread that ties together the environment, land use, transportation, and the economy as interrelated components that shape our quality of life. The word sustainability is now included in the title of the Environmental Framework.

R-167-009 Comment noted.

R-167-010 This issue was considered but the existing language was retained.

R-167-011 VISION 2040 has been revised to address this issue. What is now MPP-En-23 references the need to reduce vehicle miles traveled by increasing alternatives to driving alone.

R-167-012 See response to R-167-011.

R-167-013 VISION 2040 has addressed this issue. See what is now MPP-DP-47.

R-167-014 This is now MPP-DP-1. The existing language was retained. When rural or resource lands are brought inside the urban growth area they are considered urban.

R-167-015 Comment noted.

	Throughout the drafting of the multicounty planning policies, Snohomish County has consistently expressed concern about including any policies that restrict fully contained communities such as DP-26 and DP-27. Fully contained communities are allowed by the Growth Management Act and the Snohomish County Countywide Planning Policies. A portion of Snohomish County's 2025 population growth target is allocated to fully contained communities. The fully contained community policies and codes adopted in Snohomish County are based on lessons learned in other counties in the region and are designed to ensure an adequate job base, necessary infrastructure and community input.	
13.	To recognize the importance of conserving resources for the public, add the word "public" before "views, landmarks..." in policy DP-51.	*DP-51*
"The Economy" MPPs		
14.	Add language in the "Places" goal to clearly identify the need for economic development strategies that support local and regional visions. This could help address new technologies that are coming on line. Alternatively this could be crafted as a separate policy.	*"Places" section*
"Transportation" MPPs		
15.	Policy T-24, regarding the need to target investments toward areas that have or are planning for transit-supportive densities and land uses, should be expanded to include investments for the linkages between such areas.	*T-24*
16.	Policy T-21, as written, is highly supported by SCT and we commend its inclusion.	*T-21*
"Public Services" MPPs		
17.	Note that some areas of Snohomish County are not sewered (the Cities of Darrington and Gold Bar, for example). Policy PS-9 should be rewritten to be inclusive of narrow exceptions for existing cities without sewer or areas that are incapable of supporting sewer service.	*PS-9*
18.	Strong policies are needed to focus on financial strategies for achieving the regional vision. We commend the inclusion of PS-25.	*PS-25*

Continuation of R-167-015

R-167-016

R-167-017

R-167-018

R-167-019

R-167-020

R-167-021

Again, we appreciate the opportunity to comment. We look forward to the incorporation of our suggestions into the updated documents. If you have any questions, please do not hesitate to call Brian Sullivan, Snohomish County Tomorrow Coordinator, at 425-388-3142.

Sincerely yours,

Aaron Reardon
Co-Chair

Mayor Dennis Kendall
Co-Chair

Snohomish County Administration Building, M/S 604, 3000 Rockefeller Avenue, Everett, WA 98201-4046
425-388-3311
3

R-167-016 VISION 2040 has been revised to address this issue.

R-167-017 A primary purpose of VISION 2040 is coordination between multicounty planning policies and countywide policies, and with local comprehensive plans. Although a separate policy was not added, the narrative in the document was expanded to emphasize the relationship at the regional and local levels regarding implementation.

R-167-018 This policy was combined with another draft policy and is now MPP-T-11 in the final document.

R-167-019 Thank you.

R-167-020 VISION 2040 has been revised to address this issue. What is now MPP-PS-10 addresses "failing" septic systems. What is now MPP-PS-9 includes provisions that address sewer connections or better alternative technology.

R-167-021 Thank you.

SOOS CREEK WATER & SEWER DISTRICT

14616 S.E. 192nd St. • P.O. Box 58039 • Renton, WA 98058-1039 • Phone (253) 630-9900 • Fax (253) 630-5289

R-075

August 31, 2007

Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, Washington 98104-1035

Attn: Norman Abbott, SEPA Responsible Official

RE: Draft Vision 2040 with Appendices and Draft Supplemental Environmental Impact Statement May 2006

Dear Mr. Abbott:

Thank you for the opportunity to review the Council's Draft Vision 2040 including Appendices and Supplemental Draft Environmental Impact Statement (EIS). Soos Creek Water and Sewer District is located in south King County, and covers areas within the cities of Auburn, Black Diamond, Covington, Kent, Maple Valley, and Renton as well as unincorporated King County, serving approximately 100,000 customers. We commonly coordinate with the local land use authorities to evaluate our facilities to accommodate growth within our service area. We reviewed the documents noted above, dated July 2007 with these goals in mind and submit the following comments for your consideration:

Draft Vision 2040
Public Services
Services in General
Special Service Districts
Page 74

In general we believe separating policies by each service type would allow more consistency. Policies for water or sewer districts do not apply to hospitals or park districts. The policies identified here do not define which type of district the policy applies to, therefore they would apply to all. The District suggests categorizing the policies by type(s) of service.

Second paragraph, second sentence
"Washington state law allows such districts to be created for a variety of services, including sewer, water, drainage, flood control, parks and recreations, fire, library, public hospital, school, and public transportation."

- The District requests that the following language be added after this sentence:
  "Special service districts are generally considered regional providers due to the areas they serve. These service areas are defined in various ways including interlocal agreements, public vote, and topographical limitations.

- Adding this language will clarify the purpose and necessity of special service districts within the four-county area.

R-075-001

www.sooscreek.com

R-075-001 The narrative has been expanded to describe different types of districts.

Policy MPP-PS-4

"Do not provide urban services in rural areas. Design services for limited access when they are needed to solve isolated health and sanitation problems so as not to increase the development potential of the surrounding rural area."

- This policy is written for sewer service but is not specified as such and could potentially be used broadly for other urban services that can be provided in rural areas. An example of urban service that is allowed in the rural area is water. Making such a broad statement would undermine the intention of State law. Additionally, there are cases where even sewer service can be provided within the rural area when a health/sanitation problem exists or for provision of sewer service to schools.
- The District requests the following be added to the end of the first sentence; "where State or County regulation prohibits such use".
- Additionally, the District requests the following be added at the end of the second sentence; "unless other cases are allowed by State or County codes."

Policy MPP-PS-6

"Obtain urban services from cities and encourage special service districts including sewer, water, and fire districts to consolidate and dissolve as a result."

- The District requests that this policy be removed from the Draft Vision 2040 document. This is not an appropriate document for addressing this issue. Special service districts are necessary and allowed under State law and can only be dissolved as directed in RCW 35.13A. This decision should be made at the local level and not at a regional level.

Draft Vision 2040 Appendices
PUBLIC SERVICES ACTIONS – REGIONAL LEVEL
Special Service Districts
Page A-1-9

*"The **Puget Sound Regional Council**, on behalf of its member jurisdiction, will communicate to the Legislature that special service districts should be required to comply with the Growth Management Act."*

- The District requests clarification on this action.
- Water and sewer districts, which are special purpose districts, while not required to comply under the Growth Management Act, are required by the Washington State Department of Health and Ecology to plan and provide service within their service areas. These agencies require water and sewer comprehensive plans that are based on the planning forecasts for the individual areas each district serves. As an example, our District provides water service to customers within the City of Renton and unincorporated King County. In order to forecast growth, the District uses the Transportation or Forecast Analysis Zones information from the Puget Sound Regional Council for its service area, to analyze its water and sewer facilities for future projects, to accommodate growth. Additionally, under the new Municipal Water Law, the District is

(Continues on following page)

R-075-002
R-075-003
R-075-004
R-075-005

R-075-002 See response to R-075-001.

R-075-003 Policy left as written. "Urban services" include those public services and public facilities at an intensity historically and typically provided in cities, specifically including storm and sanitary sewer systems, domestic water systems, street cleaning services, fire and police protection services, public transit services, and other public utilities associated with urban areas and normally not associated with rural areas {RCW 36.70A.030(20)}.

R-075-004 This idea was considered in the VISION 2040 process and the language was kept as written.

R-075-005 This is now PS-Action-1. See the expanded narrative on special service districts in the Public Services policy section.

required to have each jurisdiction with land use authority provide a consistency statement in their Water Comprehensive Plans. It is possible that not all service districts are required to plan based on growth projections in their service areas.

- We suggest that the service districts be separated by function, so that this specific action can apply to those not planning under some other requirement similar to GMA. The water and sewer districts do not have land use authority, among other requirements of GMA, so compliance under GMA would not necessarily apply.

Continuation of R-075-005

Supplemental Draft EIS
Public Services and Utilities
Section 5.7 Sanitary Sewer and Water Supply
Page II.36 – II.37

The May 2006 Draft EIS contained language that addressed special service districts, which was removed in the Supplemental Draft EIS. We would like to request that language be added to address the purpose and need for special service districts.

- We request the following language be replaced or added to the Sanitary Sewer section:

  "Sewer service areas are defined by the individual jurisdictions and provide the basis for the long-range facility plans (often 30 year plans). In the event of annexation, a city can coordinate with the existing local sewer provider. However, local sewer lines provided by special districts usually extend beyond the boundaries of potential annexation and therefore, historically, the provision of sewer service has not changed dramatically."

  "Special districts are considered regional providers; Service areas are based on existing agreements with adjacent utilities, topographical limitations, existing boundaries and practical limitations of service. Agreements allow these regional special purpose districts to extend service into adjacent cities and other jurisdiction where service might not otherwise be available."

R-075-006

- We request the following language be replaced or added to the Water Supply section:

  "Water Service areas are defined by individual jurisdictions and provide the basis for long-range plans. In the event of annexations, a city can coordinate with the local water provider. However, local water lines provided by a special purpose district usually extend beyond the boundaries of potential annexation and therefore, historically, the provision of water service has not changed dramatically. These special districts are therefore considered regional providers; service areas are based on the local Coordinated Water Supply Plans, existing agreements with adjacent utilities, topographical limitations, existing boundaries and practical limitations of service. Agreements allow these regional special purpose districts to extend service into adjacent cities and other jurisdictions where service might not otherwise be available."

- These sections were deleted from the Supplemental EIS. Adding the suggested language in both sections; Sanitary Sewer and Water Supply, will provide distinction and consistency between the water and sewer sections of the Supplemental EIS and the Draft EIS. While cities can be the

R-075-007

(Comment continues on following page)

R-075-006 The Final EIS has been updated to address this issue.

R-075-007 The Final EIS has been updated to address this issue.

SOOS CREEK WATER & SEWER DISTRICT

Continuation of R-075-007

local providers, special purpose districts provide services on a regional scale, covering several jurisdictions. It is important to make this distinction when growth begins to occur in areas that are served by cities and special purpose districts. Oftentimes, in these cases, the special purpose districts provide these services on a broader scale.

Thank you for the opportunity to comment on the Draft Vision 2040 documents. We look forward to reviewing the Final documents in the future. If you have any questions regarding our comments or would like to discuss them in more detail, please feel free to contact me at (253) 630-9900.

Sincerely,

Ron Speer
District Manager

cc: Mike Hanis - Hanis Greaney, PLLC
John Roth Jr., Tony Fisher – Roth Hill Engineering Partners, LLC
Pam Cobley, Scott Goss - Roth Hill Engineering Partners, LLC

PRHC:emd

TRPC
Thurston Regional Planning Council

R-119

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September 7, 2007

Mr. Norman Abbott, Director
Growth Management Planning
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

Dear Mr. Abbott:

Subject: VISION 2040 Preferred Growth Alternative

The Thurston Regional Planning Council's Transportation Policy Board (TPB) reviewed the VISION 2040 Preferred Growth Alternative upon its release in July. You will recall that the TPB reviewed and commented on the four draft alternatives released in summer 2006. Our region's interest and policy focus in your plans are grounded in analysis demonstrating that growth patterns and transportation needs in the central Puget Sound region are exerting increasingly strong pressures on Thurston region's growth and service needs.

Comments and questions generated by the TPB are attached. Central to the TPB questions are how the Preferred Growth Alternative supports the growth of industries associated with Regional Manufacturing / Industrial Centers. Of particular interest are the growth and emerging needs of central Puget Sound's Ports. Vision 2040 should provide a better assessment and accounting for this specific, yet profoundly significant, sector given the unique land use and transportation demands generated by Ports and the modern distribution of goods and materials.

R-119-001

During our review of plans to accommodate growth in the central Puget Sound area our analysis became more focused on the role Interstate 5 plays in supporting or undermining growth management activities all along the interstate corridor. Our analysis indicates that 15,000 people commute into this region every day and 30,000 commute out. These numbers are expected to double in the next 20 years. We believe that this trend will have a profound impact on land use and transportation in the south Puget Sound area and our ability to meet our growth management objectives.

During our review of the plan, TPB members discussed the need for an I-5 corridor summit. This summit would convene regional councils situated along the corridor for the purpose of evaluating and developing appropriate discussion and responses to the challenges and opportunities that I-5 presents to our growth management objectives and community visions. The proposed summit is in its earliest stages. It is a concept we support since it would present a much-needed opportunity to provide a collective review of growth strategies from Canada to Oregon. We ask that you consider this concept as a future area of collaboration between our agencies.

R-119-002

(Comment continues on following page)

R-119-001 Comment noted. VISION 2040 actions call for work on an industrial lands strategy.

R-119-002 Comment noted. Coordination in transportation planning with counties outside the central Puget Sound region will be part of the Destination 2030 update.

Thank you for the opportunity to provide comment and input on PSRC's VISION 2040 plan. TRPC will be monitoring your progress and looking for opportunities to leverage your work so that we can better understand and manage growth in the south Puget Sound area. We appreciate the challenge and great effort that PSRC demonstrates to bring together the diverse interests of the central Puget Sound area to form a shared vision for the future.

If you need additional information or clarification regarding our comments, please contact Lon Wyrick, TRPC Executive Director. We look forward to working with you and building a foundation of collaboration and coordination between our agencies and regions.

Sincerely,

Ken Jones, Mayor of Tenino
Chair, Thurston Regional Planning Council

Doug Mah, Olympia City Council
Chair, Transportation Policy Board

Enclosure

cc: Bob Drewel, Executive Director
Mark Gulbranson, Deputy Executive Director
Charlie Howard, Transportation Planning Director

Continuation of R-119-002

VISION 2040 – Preferred Growth Alternative
Comments from Thurston Regional Planning Council and its Transportation Policy Board

Background

In 2006, the Thurston Regional Planning Council's Transportation Policy Board (TPB) conducted a review of the four alternatives presented by PSRC for its VISION 2020 Update. That review generated comments and questions that were submitted for inclusion in the Draft Environmental Impact Statement. That review also helped to inform the content of a regional policy maker forum hosted by TRPC in January 2007 that looked at ways in which central Puget Sound market factors are influencing residential development pressures in Thurston County today. PSRC staff attended that forum and presented information on the VISION 2020 Update.

TRPC and the TPB have followed development of the Preferred Growth Alternative with interest. Throughout the past year both TRPC and the TPB received regular updates from our policy makers who serve as Associate Members of PSRC's Transportation Policy Board and Growth Management Policy Board. TRPC has also received information on development of the Preferred Growth Alternative (PGA) by PSRC's Associate Member representative on TRPC, Mr. Norm Abbott.

Release of the PGA in July resulted in a special TPB work session to review this proposed alternative. As with the review of the four alternatives in 2006, the policy maker review of the PGA focused primarily on ways in which central Puget Sound's plan for accommodating growth will influence the ability of communities in the Thurston region to carry out our own plans and fulfill our own growth management objectives.

The thoroughness with which PSRC has described its PGA and documented its assumptions is impressive. It is no small feat to craft a strategic blueprint for a region of the size and complexity of central Puget Sound. And while this paper outlines questions and concerns, it is done so with the realization that the Thurston region has many questions of its own to explore and answer. As much as your VISION 2040 raises questions for us, it also sets a high standard and serves to inform and inspire our own inquiries.

R-119-003

Many of the same issues we raised last year on the four draft alternatives are still relevant in terms of the Preferred Growth Alternative. As your neighbor to the south, there seems to be little acknowledgement of the influence and impacts exerted on adjacent regions by central Puget Sound, nor of the ways in which the proximity of these adjacent regions can support or hinder the objectives outlined in the PGA. There may be untapped opportunities for achieving our growth management objectives if all the regions along the I-5 corridor consider how each of our plans affect – and are affected by – adjacent regions. Perhaps this is an area in which our two agencies can work closer together in the future.

R-119-004

We offer the following comments and questions in the spirit of fostering a truly regional dialogue about the ways in which we are growing. Comments and questions are organized by topic area.

Residential Development

The Preferred Growth Alternative seems to strike a realistic balance between the various alternatives considered for the Draft EIS. It is realistic in that it reflects many existing patterns

R-119-005

(Comment continues on following page)

R-119-003 Thank you.

R-119-004 This information has been added to the Final EIS and will be part of the Destination 2030 update.

R-119-005 Thank you.

Continuation of R-119-005

that are already in place – radically new directions cannot be achieved when so much development pattern is already established. In terms of balance, the PGA seems to recognize that some areas of the region can and should strive for higher densities and greater urban form while other areas are more suited for less-intensive urbanization.

What is still unclear to us, though, is how the availability, affordability, and proximity of land in Thurston County is factored in to the long-range residential growth projections and housing assumptions for central Puget Sound. As land and housing prices in the central Puget Sound region increase, people will continue to seek out affordable housing further and further from where they work. Our Thurston County Commuting study validated that finding. This region currently has 15,000 inbound commuters and 30,000 outbound commuters, with Pierce County the primary destination for outbound commute trips. Those numbers are projected to double in the next 20 years. Thurston County serves as a relief valve for some unmet housing need in central Puget Sound but the PGA is silent on this relationship.

R-119-006

It is difficult to assess the viability of efforts to achieve a jobs/housing balance in central Puget Sound when the influence of adjacent regions is not taken into consideration. It also suggests that SDEIS impacts should include outbound commuter flows in adjacent regions since this may help determine the best mix of transportation investments to meet the growing needs of all central Puget Sound workers and not just those who can afford to live close to where they work.

R-119-007

Industrial Development

VISION 2040 is described as a "growth management, economic, and transportation strategy" for the Puget Sound region. The PGA clearly defines "Regional Manufacturing / Industrial Centers" and identifies those locations where intensive manufacturing and industrial activities are taking place. It includes policy language that supports a regional framework for future designation and evaluation of such centers as well as the need to protect existing areas from incompatible adjacent uses. The PGA is clear that locating industrial land uses close to compact residential areas supports a regional goal of achieving a jobs-housing balance. There is also policy language in the Economy section that supports the vital role of central Puget Sound as an "international gateway" via its ports.

Despite this overarching purpose, goal and policy language, though, the PGA does not actually identify any new regional manufacturing / industrial centers. This seems short-sighted in light of Puget Sound Regional Council's many contributions to the global trade and freight mobility discussions via its Prosperity Partnership, its Regional Freight Mobility Roundtable, and its support of the West Coast Corridor Coalition, the FAST Corridor, and numerous other efforts. With this regional understanding of the importance to the state and national economies of global trade, the dynamic nature of freight mobility systems, and the importance of making strategic long-term freight mobility investments, VISION 2040 provides a logical venue for identifying the location of new centers to accommodate future growth, or at least the criteria by which new regional manufacturing / industrial centers will be determined.

In the Thurston region we are aware that the Port of Tacoma is looking at satellite locations to support its growth in dockside activities in order to maintain the vital role it plays in the state's and nation's economy. We did not see any recognition in the PGA of this need for additional land to support the Port of Tacoma's long range needs despite its apparent consistency with the "regional manufacturing / industrial centers" designation and multi-county planning policies. The absence of clearly defined criteria and conditions under which new centers will be designated raises questions for us as to whether this is a regional growth need that the PGA supports. Without a long range vision for how central Puget Sound will accommodate future

R-119-008

(Comment continues on following page)

R-119-006 The population and employment numbers are provided by PSRC forecast models. These models take wide-ranging national, state, regional, and local data into consideration.

R-119-007 A discussion of this issue has been added to the Final EIS.

R-119-008 VISION 2040 has been revised to include references to the adopted criteria for designating new manufacturing/industrial centers.

growth in established enterprises, adjacent regions will play an increasing role as satellite "regional manufacturing / industrial centers," perhaps without any coordination or strategy for how to serve that role. This lack of coordination can undermine not only the growth management plans of those adjacent regions but those of central Puget Sound as well.

As we make these comments, we are mindful of our own lack of clarity as to how to best accommodate industrial land uses and their infrastructure needs in the Thurston region. As with recent residential growth pressures, we realize that industrial market forces emanating from the central Puget Sound region are beginning to exert unquestionable growth pressure on this region's industrial lands and infrastructure. We look to PSRC for information and direction as to how the state's economic engine will be supported in the central Puget Sound region to better understand the choices and opportunities we face in the Thurston region. Central to this is the way in which Regional Manufacturing / Industrial Centers are addressed in the PGA.

QUESTION:

It appears to be the intent of the PGA to maintain an adequate supply of developable industrial land for future needs. Describe the framework for evaluating and designating new regional manufacturing / industrial centers. How does the availability, proximity, and affordability of land in adjacent regions factor into that evaluation process? Specifically, how does the PGA support the growth needs of the Port of Tacoma?

The PGA calls for a significant increase in industrial / manufacturing employment. How do low-employment density/high-square footage industries like distribution centers fit into that concept? Are these uses consistent with the intent of regional manufacturing / industrial centers? If not, where do they fit into the long-range growth strategy for central Puget Sound?

Military Bases

Military bases in central Puget Sound seem to present untapped opportunities as well as potential risks for growth management. In terms of transportation, the post-911 world lacks public transportation options for the military personnel and civilians who report to work at bases across Puget Sound every day. We encourage PSRC and its member transit agencies to look for creative ways of establishing viable transit alternatives for the thousands of active troops and civilians who currently have little choice but to drive to work on local and state roads. Security measures may render more traditional forms of transit unworkable but the combined efforts of PSRC and some of the state's most influential transit agencies working together with the military must surely be able to identify and implement some workable form of public transit or ridesharing.

In terms of risk, we are concerned that spin-off implications associated with the Cross Base Highway may put undue pressure on Fort Lewis and McChord Air Force base from incompatible land uses. As the Cross Base Highway increases development access to southeastern Pierce and Thurston counties it will generate new pressures on the military base itself. We have commented previously on the challenges the Cross Base Highway will present to rural communities that will face increasingly strong suburban development pressures when it is complete. We are concerned that those same development pressures will crowd the military base and the jobs it supports, especially in light of the national trend towards developing decommissioned bases as planned communities.

Another area of concern relates to the 2040 military estimates. This affects both PSRC and TRPC forecasts, as neither agency has the capacity to project future troop levels. This is

(Comment continues on following page)

Continuation of R-119-008

R-119-009

R-119-010

R-119-011

R-119-012

R-119-013

R-119-009 VISION 2040 recognizes the importance of the ports. The Destination 2030 update also provides an opportunity to address this issue.

R-119-010 VISION 2040 includes policies that support manufacturing/industrial centers. Land use within individual centers is addressed at the local jurisdictional level.

R-119-011 Comment noted.

R-119-012 Comment noted.

R-119-013 VISION 2040 has been revised to include more discussion regarding the military sector employment and forecasting, as well as the importance of the military as an economic sector.

unfortunate from a planning perspective because Fort Lewis is the Defense Department's only "power projection platform" on the west coast, so 'no growth' over the next 40 years is highly unlikely. The question is – what will that growth be and when will it occur? Increased troop levels result in increases in dependent populations which in turn increase the need for housing, schools, and other government services. It is important to our local communities in both Pierce and Thurston counties that our agencies find a way of improving the ability to forecast projected troop levels so that we will be in a better position to provide for their needs when they arise.

Monitoring and Measures

We applaud the inclusion of the "Monitoring and Measures" component of VISION 2040. This will enable PSRC to gage over time how well the regional vision is aligning with implementation realities and to fine-tune either the vision or the implementation tools based on actual performance results. This addresses a key concern we had when reviewing the four draft alternatives last year and will provide you with a useful tool for evaluating future plan updates.

We look forward to seeing the results of this work as it evolves, both in terms of methodologies as well as data, interpretations and trends. Having embarked a couple of years ago on our own effort at monitoring progress towards achieving the visions outlined in our Comprehensive Plans we know that this effort is likely to grow more complex once you begin interpreting the data. However, all of your constituencies will benefit from the effort to better align reality and visions.

The areas of agreement that PSRC will monitor is commendable. We appreciate the effort to identify a range of measures in each of the five key areas of regional agreement. This in itself represents a significant level of regional cooperation and trust among PSRC members. That said, we'd like to suggest two additional outcomes and measures for your consideration.

This first suggested outcome and measure provides linkage between your transportation, development, and employment goals, and your objective of achieving a jobs / housing balance:

Outcome: The region achieves a jobs/housing balance that enables its residents to live and work in the central Puget Sound region.
Measure: Change in inbound / outbound commute flows between PSRC and adjacent regions.
Source: US Census

The second suggested measure is specific to transportation and the goals of multi-modalism and system investments that support the growth strategy:

Outcome: The transportation system moves people more efficiently.
Measure: The change in passenger miles traveled versus the change in vehicle miles traveled.
Source: PSRC Household Travel Survey and model

Previous Comments on Draft EIS

While many of our previous comments and questions have been answered with release of the draft PGA, some are still relevant. We've addressed most of those outstanding issues in these comments. However, we would still encourage you to consider how well market factors are likely to support the environmental framework used to develop the PGA. We would also be interested in learning what additional tools are needed – or legislative hurdles overcome – to help PSRC and its communities achieve the collective vision for growth that the PGA reflects. Helping the central Puget Sound region to achieve its growth management objectives will help the Thurston region to achieve its objectives, to the benefit of all of our constituencies.

TRPC Comments on VISION 2040, Page 4

Continuation of R-119-013

R-119-014

R-119-015

R-119-016

R-119-017

R-119-014 Thank you.

R-119-015 A new policy has been added to help clarify and address this issue.

R-119-016 VISION 2040 has been revised to address the issue of vehicle miles traveled. See T-Measure-4.

R-119-017 VISION 2040 has been revised to strengthen the importance of implementation. The actions provide specific implementation steps and tasks, and have been moved from the appendix into respective policy sections.

R-096

COMMISSIONERS
Gary G. Cline
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GENERAL MANAGER
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August 31, 2007

Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, Washington 98104-1035

Attn: Norman Abbott, SEPA Responsible Official

RE: Draft Vision 2040 with Appendices and Draft Supplemental Environmental Impact Statement
July 2007

Dear Mr. Abbott:

Thank you for the opportunity to review the Council's Draft Vision 2040 including Appendices and Supplemental Draft Environmental Impact Statement (EIS). King County Water District No. 111 is located in east King County, and serves areas within the cities of Auburn, Covington and Kent as well as unincorporated King County. The District typically coordinates with the local land use authorities of these jurisdictions to evaluate existing and future facilities to accommodate growth within our service area. We reviewed the documents noted above, dated July 2007, and submit the following comments for your consideration:

Draft Vision 2040
Public Services
Services in General
Special Service Districts
Page 74

The District believes that separating the policies by service type would allow for more consistency. Policies for water or sewer districts do not apply to hospitals or park districts. The policies identified here do not define which type of district the policy applies to, therefore it is assumed that they would apply to all districts. We suggest categorizing the policies by type(s) of service for clarification.

Second paragraph, second sentence

"Washington state law allows such districts to be created for a variety of services, including sewer, water, drainage, flood control, parks and recreations, fire, library, public hospital, school, and public transportation."

- The District requests that the following language be added after the above sentence:
  "Special service districts are generally considered regional providers because of the areas served by them. These service areas are defined by several criteria including, but not limited to, interlocal agreements, public vote, and topographical limitations.

- Adding this language will clarify the purpose and need for special service districts within the four-county areas they serve.

R-096-001

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R-096-001 The narrative has been expanded to describe different types of districts.

Policy MPP-PS-4

"Do not provide urban services in rural areas. Design services for limited access when they are needed to solve isolated health and sanitation problems so as not to increase the development potential of the surrounding rural area."

- This policy is written specifically about sewer service but is not specified as such and could potentially be used broadly for other urban services that can be provided in rural areas. Water service and fire flow are examples of urban services that are allowed in the rural areas. In fact, water utilities have a duty to provide this urban service. The broad general statement above would undermine the intent of State law.
- The District requests the following language be added to the end of the first sentence; "where State or County regulation prohibits such use".
- Additionally, the District requests the following language be added at the end of the second sentence; "unless other cases are allowed by State or County codes."

Policy MPP-PS-6

"Obtain urban services from cities and encourage special service districts including sewer, water, and fire districts to consolidate and dissolve as a result."

- The District requests that this policy be removed from the Draft Vision 2040 document. This document is not an appropriate venue for addressing this issue. Special service districts are necessary and allowed under State law and can only be dissolved as directed in RCW 35.13A. This decision should be made at the local level and not at a regional level.

Draft Vision 2040 Appendices
PUBLIC SERVICES ACTIONS – REGIONAL LEVEL
Special Service Districts
Page A-1-9

*"The **Puget Sound Regional Council**, on behalf of its member jurisdiction, will communicate to the Legislature that special service districts should be required to comply with the Growth Management Act."*

- The District requests clarification on this action.
- Water districts, which are special purpose districts, while not required to comply with the Growth Management Act, are required by the Washington State Department of Health (DOH) and the Washington State Department of Ecology (DOE) to plan and provide service within their service areas. DOH and DOE require water districts to prepare comprehensive plans using information from planning forecasts for individual areas within that district's service areas. As an example, the District provides water service to customers within the cities of Kent and Auburn and unincorporated King County. In order to forecast growth, the District uses the Transportation or Forecast Analysis Zones information from the Puget Sound Regional Council for its service area, to analyze its water facilities for future projects, to accommodate growth and future water demand. The District neither controls the land use nor prepares GMA – based population forecasts. Additionally, under the new Municipal

(Comment continues on following page)

R-096-002

R-096-003

R-096-004

R-096-005

R-096-002 See response to R-075-001.

R-096-003 Policy left as written. "Urban services" include those public services and public facilities at an intensity historically and typically provided in cities, specifically including storm and sanitary sewer systems, domestic water systems, street cleaning services, fire and police protection services, public transit services, and other public utilities associated with urban areas and normally not associated with rural areas {RCW 36.70A.030(20)}.

R-096-004 This idea was considered in the VISION 2040 process and the language was kept as written.

R-096-005 The narrative has been expanded to describe different types of districts.

Water Law, the District is required to have each jurisdiction with land use authority provide a consistency statement in their Water Comprehensive Plans. It is possible that not all service districts are required to plan based on growth projections in their service areas.

- We suggest that the service districts be separated by service type so that this specific action can apply to those not planning under some other requirement similar to GMA. The water districts do not have land use authority, so compliance under GMA would not necessarily apply.

Continuation of R-096-005

Thank you for the opportunity to comment on the Draft Vision 2040 documents. We look forward to reviewing the Final documents in the future. If you have any questions regarding our comments or would like to discuss them in more detail, please feel free to contact me at (253) 630-9900.

Sincerely,

William C. Hall

William Hall
District Manager

cc: John Milne- Inslee, Best, Doezie & Ryder, P.S.
Greg Hill – Roth Hill Engineering Partners, LLC
Pam Cobley, file - Roth Hill Engineering Partners, LLC

PRHC:emd

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STATE OF WASHINGTON
DEPARTMENT OF FISH AND WILDLIFE
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S-135

Norman Abbott
SEPA Responsible Official
Puget Sound Regional Council
1011 Western Ave, Suite 500
Seattle, WA 98104-1035

Subject: WDFW Comment on Draft Vision 2040 and the Supplemental Environmental Impact Statement

Dear Dr. Abbott:

Thank you for the opportunity to review Draft VISION 2040 and the Supplemental Environmental Impact Statement. The Washington Department of Fish and Wildlife (WDFW) is pleased to see a regional vision of future growth in central Puget Sound that focuses new growth primarily into existing urban areas, avoids sprawl, and emphasizes development methods that will be more protective of fish and wildlife resources.

The Preferred Growth Alternative contains key policies and strategies that can help protect and maintain the viability of fish and wildlife species and their associated habitats from uncoordinated growth. While any major growth scenario for the central Puget Sound region will have some unavoidable impacts on fish and wildlife resources, the Preferred Alternative does a good job in trying to balance compact growth with environmental and resource land protection. While the Metropolitan Cities Alternative was our favored alternative from the DEIS (see our letter dated July 24, 2006), important elements of concentrating growth in metropolitan cities and lowering growth in rural and unincorporated urban growth areas are maintained in the Preferred Alternative.

We especially like the following aspects of Vision 2040 under the Preferred Alternative:

- Focusing the majority of future population growth metropolitan cities, and reducing population growth to be received by rural and unincorporated areas. We are pleased to see a preference on putting new growth in existing UGAs over new fully contained communities in rural areas, reviewing the regional impacts of new growth in rural areas, and preventing future fragmentation in rural lands. These policies and actions are particularly important to maintaining the integrity of large, connected habitat blocks that primarily occur in rural lands.

- Choosing the alternative with the lowest amount of new impervious surfaces, and recognizing the need to maintain healthy watersheds even in highly urbanized areas through improved stormwater systems and riparian corridors.

S-135-001 Thank you.

S-135-002 Thank you.

S-135-003 Comment noted.

S-135-004 Thank you.

S-135-005 Comment noted.

- Decreasing urbanization in rural floodplains and habitat fragmentation in other rural areas. S-135-006

- Implementing the Vision through multicounty planning policies that will in turn guide countywide and local planning policies. MPP-A-2, which appears to require the update of local countywide planning policies to address Vision 2040 policies by December 31, 2010, is a good strategy to help ensure consistency between local plans and Vision 2040. S-135-007

- Encouraging landscape planning and environmental assessment at a variety of scales (MPP-En-2), including incorporation of regional environmental planning initiatives such as WRIA planning into local comprehensive plans. We feel there is a great need for better regional coordination of salmon recovery planning, water and stormwater planning, transportation and infrastructure planning, and shoreline and critical areas planning with other aspects of comprehensive planning and zoning. There are many existing and emerging landscape-based planning tools available from state agencies and other organizations to help implement this policy and supporting actions, including WDFW's Local Habitat Assessment tool. We look forward to opportunities to work with PSRC and local jurisdictions to implement environmental planning (see contact information, below). S-135-008

- Using scientific information to establish and implement environmental standards (MPP-En-7). S-135-009

- Identifying, protecting, and enhancing open space networks and wildlife corridors both with and outside urban growth areas (Earth and Habitat Goals, Policies, and Actions; see especially MPP-En-8, MPP-En-9, MPP-En-11). While open space corridor planning is a requirement under the Growth Management Act, few jurisdictions have designated and implemented comprehensive networks and corridors vital to fish and wildlife in a developing landscape. WDFW looks forward to assisting local jurisdictions in central Puget Sound to implement these multicounty policies through the envisioned Regional Greenspace Strategy, through local actions, and through the short-term action identified in Appendix 1 to develop a common methodology for assessing species habitat needs. S-135-010

- Supporting the viability of working natural resource lands. S-135-011

- Coordinating buildable lands analysis and creating a framework to review UGA changes in the region. WDFW recognizes that UGA expansion that is contemplated without a detailed analysis of the existing city and UGA capacity, and without a thorough habitat assessment of the proposed expansion area, is one of the greatest threats to fish and wildlife habitat integrity and connectivity. S-135-012 S-135-013

- Develop a regional TDR, PDR, and other innovative strategies to protect rural areas and resource lands. WDFW is hopeful that these innovative approaches will S-135-014

(Comment continues on following page)

Response to Comment Letter

S-135-006 Comment noted.

S-135-007 Thank you.

S-135-008 Concur. Also, VISION 2040 has been revised to address this issue, with stronger provisions on this topic.

S-135-009 Thank you.

S-135-010 Concur.

S-135-011 Concur.

S-135-012 Comment noted.

S-135-013 VISION 2040 addresses this issue.

S-135-014 Thank you.

Comment Letter

Vision 2040
Page 1 of 4
September 7, 2007

include identification of priority fish and wildlife habitat areas at regional, county, and local scales as development rights sending areas or focus areas for conservation actions. WDFW can offer assistance in identifying these important areas.

- Monitoring plan implementation and effectiveness, a critical piece of achieving 2040 and allowing for adaptive management over time if goals are not being met.

Vision 2040 could be strengthened by:

- Clarifying the population allocation process to be used to implement Vision 2040. The document states "Following the adoption of VISION 2040, within each county, the relative distribution of growth to individual jurisdictions and unincorporated areas will be adjudicated through countywide target setting processes, in order to take into account local circumstances." *Page I.16* Policies MPP-SP-7 and –8 support this action, but it is not clear how rigorously the target-setting process will be held to the growth goals of the Vision document.

- Further encouraging the use of low impact development in the urban areas receiving a majority of future growth, in order to control stormwater runoff into local streams. Policy language encouraging the use of innovative design (e.g., green building and low impact development) could be strengthened in the Urban Design Goal and Policies and in MPP-DP-25 Given that important salmon-bearing streams travel through metropolitan and other urban areas, concentrating growth in these will require increased attention to controlling nonpoint source water pollution (as was mentioned in our previous comment letter).

- Adding stronger policy language on UGA expansion that calls for a land capacity analysis of the existing urban area before UGA expansion is considered, and a policy to ensure that UGA expansion will avoid encroachment into important habitat areas, disruption of connected wildlife corridors (similar to policies MPP-DP-4 and -5 for resource lands).

- Expanding discussion of the action envisioned in Appendix 1 for PSRC to review and report on the efforts between counties and cities to coordinate the designation and protection of critical areas. A useful component to this action would be a determination of the effectiveness of critical area buffers and other standards being implemented across the region, particularly how those standards are being met or not met on the ground.

We encourage you and your member jurisdictions to contact our technical assistance staff during the implementation phase of Vision 2040. Key WDFW contacts are provided below:

Continuation of S-135-014
S-135-015
S-135-016
S-135-017
S-135-018
S-135-019
S-135-020
S-135-021

Response to Comment Letter

S-135-015 Thank you.

S-135-016 Thank you.

S-135-017 VISION 2040 has been revised to address this issue.

S-135-018 VISION 2040 has been revised to address this issue. MPP-DP-22 prohibits development at urban densities in rural and resource lands.

S-135-019 Although the policy language was not changed, the text was revised to address this issue.

S-135-020 See what is now policy MPP-DP-31 regarding the conversion of resource lands to other uses.

S-135-021 See En-Action-3. The details of this action will be compiled later as part of the work program and budget decisions.

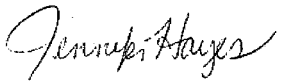
Local Habitat Assessment/landscape planning:
John Carleton, tel. 360-902-2622, carlejpc@dfw.wa.gov

Snohomish, King, and Pierce Counties:
Pamela Erstad, PHS/GMA Biologist, tel. 425-379-2308 or erstapke@dfw.wa.gov

Kitsap County:
Jeff Davis, Assistant Regional Habitat Program Manager, tel. (360) 895-3965 or davisjpd@dfw.wa.gov

Thank you again for the opportunity to review draft Vision 2040. WDFW looks forward to assisting your region in achieving the ambitious goals of the Vision.

Sincerely,



Jennifer Hayes
PHS/GMA Coordinator
Habitat Program
Tel. 360-902-2562
hayesjlh@dfw.wa.gov

Cc: Pamela Erstad, WDFW Region 4
Jeff Davis, WDFW Region 6

Response to Comment Letter

Note: This page of comments does not require a response.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

F-142

September 7, 2007

Reply to
Attn of: ETPA-088 07-046-PSRC

Mr. Norman Abbott
State Environmental Policy Act (SEPA) Responsible Official
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, Washington 98104-1035

Dear Mr. Abbott:

The U.S. Environmental Protection Agency, Region 10, has reviewed the Draft VISION 2040 and its Supplemental Draft Environmental Impact Statement (SDEIS). VISION 2040 is the Puget Sound Regional Council (PSRC) preferred alternative for a long-range growth management, economic, and transportation strategy for the central Puget Sound region. If adopted, VISION 2040 would influence all aspects of environmental protection in the Puget Sound metropolitan region, and we believe that influence would be beneficial. We appreciate and welcome the opportunity to provide comment on the strategy.

The VISION 2040 preferred growth strategy is a variant of the four alternatives presented in the State Environmental Policy Act (SEPA) Draft Environmental Impact Statement (DEIS). Environmental sustainability is its central focus. We think VISION 2040 is bold, refreshing, efficiently presented, and is just what the region needs. Even if no changes are made to the draft, we think the VISION document is a significant improvement and appropriate update to VISION 2020. We fully support the preferred alternative and commend the PSRC for choosing to focus on environmental sustainability. This focus is as important for the Region today as it is for the future, as we try to accommodate another 1.7 million people and 1.2 million new jobs.

We wish to affirm that VISION 2040 provides an accurate sketch of the status quo and conveys right paths, via the goals, multicounty planning policies, actions, and measures, to improve current and future conditions for all residents of the region. We hope that our comments, which follow, will provide further "food for thought".

F-142-001

Transportation

Integration of environment with land use and transportation planning. We agree with the VISION 2040 statement (p. 55) that an integrated systems approach that holistically addresses land use, transportation, environment, urban form, and social concerns is needed. One way to help implement this is to provide leadership for the PSRC member jurisdictions in implementing SAFETEA-LU Section 6001 and its

F-142-002

(Comment continues on following pages)

F-142-001 Thank you.

F-142-002 VISION 2040 has been revised to address this issue, with stronger policies and narrative related to transportation and the environment.

Appendix A on linking the transportation planning and NEPA process. We recommend that this be done.

In small ways the VISION 2040 document can be strengthened to more fully convey this need for integration. For example, even though an integrated systems approach is advocated by setting an environmental framework and by calling for a systems approach, elsewhere in the document, VISION 2040 emphasizes integration of land use and transportation but does not mention the environment. To ensure that the environment does become integrated as the foundation for planning and decision making, particularly with respect to economy and transportation, it needs to have consistent mention and visibility in each section of the document. For the most part this is achieved; however, more could be done to increase this emphasis.

For example, the Transportation section includes several good environmental policies, such as, MPP-T-17, MPP-T-18, MPP-T-22, and MPP-T-23. Yet overall, this section seems to convey that the environment is secondary in importance to transportation that is needed to support or drive the economy. To address this, it may be helpful to move or repeat some of the multicounty planning policies located in other sections that affect transportation. These could include policies such as MPP-DP-29 and MPP-En-19. Including policies in two locations would, of course, create redundancies within the document, and PSRC has done an admirable job to remove them. However, it would also improve the visibility of and attention to these important environmental considerations.

We also note the policy regarding the need to effectively address linear features in the landscape in planning and design (MPP- DP-59). We think this policy would benefit from further elaboration as to how it would be implemented, and as to how it might relate to ecological connectivity and the siting and design of transportation infrastructure.

Environment

Implementation of Goal and Policies MPP-En-1 through MPP-En-7. We fully support the goal and policies stated on page 29 of the Draft VISION 2040. However, we are concerned that some local governments may not have the resources and staff expertise (such as, ecologists, biologists, etc.) to effectively implement these policies. Some small cities and towns, such as those in rural areas, may be in financial crisis, yet they are responsible for protecting much of the healthiest remaining natural environment, including farms and forest lands. In these rural areas, where pressures, focus and incentives can often be weighted toward development and opportunities to increase the tax base, there is a need to provide support or financing so that business can be conducted in ways that will sustain a healthy natural environment. We recommend that a policy, action, and measure be added in which the PSRC would seek and develop innovative ways to build local capacity to comply with these and other environmental policies.

MPP-En-18. This policy calls for maintaining or doing better than existing air quality standards for air toxics, fine particulates, and greenhouse gases. While there are

(Comment continues on following page)

Continuation of F-142-002

F-142-003

F-142-004

F-142-005

F-142-003 Comment noted. What is now DP-41 addresses the use of natural boundaries to determine infrastructure connections and improvements.

F-142-004 VISION 2040 has been revised to address this issue. VISION 2040 includes an action that calls for a program to convey the provisions to PSRC members and an education effort to reach out to the general public.

F-142-005 VISION 2040 has been revised to address this issue. The Destination 2030 update will provide an opportunity to review this issue.

National Ambient Air Quality Standards (NAAQS) for particulates, carbon monoxide, ozone, and other criteria air pollutants, there are currently no NAAQS for mobile source air toxics or greenhouse gases. For this reason, we recommend re-wording this policy and the previous policy to separate the criteria pollutants from those without ambient air quality standards. Suggested wording could be as follows:

- MPP-En-17 Maintain or do better than existing standards for carbon monoxide, ozone, particulates (PM10), and fine particulates (PM2.5).
- MPP-En-18 Maintain or do better than existing air quality conditions for air toxics and greenhouse gases.

For more information on air toxics, see the EPA National Air Toxics Assessment (NATA) at http://www.epa.gov/ttn/atw/nata1999/index.html, or contact Wayne Elson in our Seattle office at (206) 553-1463.

Continuation of F-142-005

Administrative Multicounty Planning Policies

MPP-A-2. Policy MPP-A-2, (page 25, VISION 2040) calls for countywide planning policies to be updated, where necessary, prior to December 31, 2010 to address the revised multicounty planning policies in VISION 2040. It seems that this would be an important but fairly straightforward task that would improve decision making as soon as it is implemented, yet not necessarily require three years to complete. Thus, we recommend that an earlier compliance date be considered.

F-142-006

Policy and Plan Review and Certification

On page 82, the VISION 2040 indicates that the consistency report from the review of local Comprehensive plans and transportation-related provisions will be a primary tool for developing PSRC's certification recommendation for the PSRC boards to consider. We would like to suggest that additional items be considered in developing this report that would increase the intended focus on and integration of the environment into the plans and programs of PSRC's member jurisdictions.

F-142-007

Currently, it is our understanding that the review and certification process requires as one of its criteria that a transportation project complete the NEPA and/or SEPA environmental review process. We think that a check in the "yes" box for this requirement would not provide adequate information about the environmental aspects of the project. It could be helpful to convey information about the quality of the environmental review process, the significance of the project's environmental impacts, and the adequacy of mitigation for these impacts. We recommend there be an approach to discern and weigh these features, and to evaluate this information using the multicounty planning policies before a certification decision is made. There could also be a given subset of environmental multicounty planning policies that would need to be met before certification could be obtained.

F-142-008

The above methodology applies to the end of the transportation project development process, and the end of the NEPA process. Thus, the timing is very late, and much time and funding have been invested in the projects to bring them to this point. We therefore would recommend another, perhaps more effective approach to integrating

F-142-009

(Comment continues on following page)

F-142-006 Comment noted. The existing language was retained.

F-142-007 Comment noted. This issue will be addressed after adoption of VISION 2040. See T-Action-9.

F-142-008 Comment noted. See T-Action-13 and T-Action-14.

F-142-009 See response to F-142-008.

environment into land use and transportation plans that would occur much earlier in the process, which we describe below.

Regional Evaluation of Direct, Indirect, and Cumulative Effects.

Metropolitan transportation plans are exempt from NEPA environmental review, which means that environmental impact issues are not put out for multi-agency and public discourse until the project development stage, all too often resulting in undesirable project conflict and delay. SAFETEA-LU Section 6001 and Appendix A are attempts to provide a means to address the environmental concerns much earlier during the planning process. As discussed above, we encourage PSRC to provide leadership in implementing these provisions

There is an additional action that PSRC could undertake to improve environmental integration in land use and transportation planning. PSRC could evaluate and communicate, from a regional perspective using regional models, tools, and expertise, the direct, indirect, and cumulative impacts of proposed transportation projects and other major economic proposals. Such analyses would focus upon key vulnerable resources, such as, vanishing habitats or species, loss of agricultural or forest lands, and so on, and would be conducted prior to offering support to such projects. With respect to transportation projects, it would be valuable to have this information prior to including the projects within the Metropolitan Transportation Plan (MTP). Efforts to recognize these impacts early would increase the likelihood of avoiding and minimizing impacts, as well as streamlining the environmental review process during project development. The specifics of this suggestion would need to be developed collaboratively, and the process that would potentially be followed would need to be well documented.

We thank PSRC for their excellent and progressive planning efforts, and we hope for its success. Please involve us in any way that would be of help. If you have questions regarding these comments, please contact Elaine Somers of my staff, at (206) 553-2966 or me at (206) 553-1601.

Sincerely,

/s/

Christine B. Reichgott, Manager
NEPA Review Unit

Continuation of F-142-009

Continuation of F-142-002

Continuation of F-142-009

F-142-002 (continued) See initial response to this comment.

F-142-009 (continued) See initial response to this comment.

Comment Letter

F 142 (attachment)

-----Original Message-----
From: Somers.Elaine@epamail.epa.gov <Somers.Elaine@epamail.epa.gov>
To: Norman Abbott
Sent: Mon Sep 17 17:42:39 2007
Subject: VISION 2040

Hello, Norman,
After sending our comment letter on VISION 2040, I realized there was one additional comment I had meant to include. It is one that I mentioned to you when we last met. For what it is worth, I'll offer it here, in case it is of help.

In my experience with local governments and transportation, I have seen jurisdictions invoke the GMA to justify what could be considered overdevelopment of the urban areas. In other words, the GMA mandate to focus growth (and more and more growth) in urban centers both drives and is used as justification for ignoring the environmental concerns within those urban areas. Critical areas are not respected, and build-out/densification creates impervious surfaces that cover drinking water aquifer recharge areas. This leads to falling aquifers, dry streambeds, and dependence on outside sources of drinking water (which require more pipelines to be constructed, etc.) There needs to be a policy that calls for environmental protection within urban areas as well. We cannot sustain ecological functions by protecting only rural areas, particularly when cities are often located in the most environmentally sensitive areas, such as estuaries, lowland valleys, shorelines, etc.

F-142-010

Thank you, Norman.
Elaine

Elaine Somers
U.S. Environmental Protection Agency
1200-6th Ave, Suite 900, ETPA-088
Seattle, WA 98101-3140
phone: 206/553-2966
fax: 206/553-6984
email: somers.elaine@epa.gov

Response to Comment Letter

F-142-010 The environmental provisions in VISION 2040 apply to urban lands, as well as rural and resource lands.

Comment Letter

I-028

Robin McClelland

From: FormProcessing@psrc.org
Posted At: Saturday, August 04, 2007 12:07 PM
Conversation: Draft VISION 2040 Comment
Posted To: Vision 2040

Subject: Draft VISION 2040 Comment

Hello!
This is results of submitted form by 70.57.73.47.

Submitter Email : FormProcessing@psrc.org

Fields:
01.name = A. Steffen
02.address = 4411 S. Hudson
03.city = Seattle
04.state = WA
05.zip/postalcode = 98118
06.email =
07.comments = Please more strongly incorporate the following elements:

increasing housing supply within urban areas to make housing more afforable; I-028-001

creating compact neighborhoods and mixed-use density; I-028-002

making transit, bikes and pedestrians a priority over cars; I-028-003

reducing regional greenhouse gas emissions by at least 50% (preferably going carbon-neutral) I-028-004

protecting salmon and other endangered species while increasing green space; I-028-005

sharply reducing the number of toxic chemicals used by consumers and industry; I-028-006

preserving working farmlands I-028-007

mailto = vision2040@psrc.org,dmclaughlin@psrc.org
subject = Draft VISION 2040 Comment

1

Response to Comment Letter

I-028-001 VISION 2040 has been revised to address this issue. The housing policies in VISION 2040 are now a separate policy section. Affordability provisions have been revised to address workforce housing.

I-028-002 VISION 2040 addresses this issue in the narrative of the Development Patterns section and in the subsection titled "Compact Urban Communities." It is also addressed in Part II: Regional Growth Strategy.

I-028-003 VISION 2040 has been revised to address this issue with provisions that address increasing the proportion of trips made by alternatives to driving alone. Also, the Destination 2030 update will provide an additional opportunity to further address this issue.

I-028-004 VISION 2040 has been revised to address this issue. For example, the new policy MPP-En-20 was added to address the reduction of greenhouse gas, and what is now MPP-En-23 was revised to reference reducing vehicle miles traveled. Also, see the changes in the narrative.

I-028-005 VISION 2040 has been revised to address this issue. See the added narrative on habitat and salmon recovery.

I-028-006 VISION 2040 has addressed this issue.

I-028-007 VISION 2040 has been revised to address this issue.

Comment Letter

Robin McClelland

From: FormProcessing@psrc.org
Posted At: Friday, September 07, 2007 1:46 PM
Conversation: Draft VISION 2040 Comment
Posted To: Vision 2040

Subject: Draft VISION 2040 Comment

I-147

Hello!
This is results of submitted form by 71.112.95.227.

Submitter Email : FormProcessing@psrc.org

Fields:
01.name = Angela Wingate
02.address = 1302 Puyallup Street
03.city = Sumner
04.state = WA
05.zip/postalcode = 98058
06.email = awingate@investco.net
07.comments = After reviewing the Vision 2040 draft and attending the Tacoma public meeting there are several items that should be re-evaluated in this region plan.

In regards to the statement that this regional plan provides a high quality of life well into the future, it's not true that densifying the urban areas will create a high quality of life for everyone, everyone doesn't want to live in urban densified areas. Many families with children do not want to walk down a busy downtown street and take their children to parks where homeless people are hanging out. These families would have to drive out of the urban area in order to find safe parks for their children to play. Children cannot safely play in high-rise buildings; this is not a creation of vibrant and livable communities. More evaluation should be given to providing a diversity of housing, not just building high-rises in urban center areas. The citizens should be allowed freedom in being able to choose to live where they want to. It seems that this regional plan will make people have to live in the urban centers because new development will not be encouraged in the subu!
rbs, where the majority of families with children choose to live. Evaluation should be given to a Real Estate Market Analysis in the Puget Sound Region where it can demonstrate where the majority of people choose to live.

I-147-001
I-147-002

You should evaluate how the Puget Sound region may loose many long standing good employment companies due to their employees not being able to find quality housing near their jobs. This has to do with quality of life and many employers take this into consideration when they start loosing good employees and are unable to find good employees to replace them due to the traffic congestion and high price of housing near the company. For instance, this past year there was a garage door opener manufacturing company in Redmond that had been in business for quite a while and they packed up the business and relocated to eastern Washington because their employees were not willing to drive the commute, were not willing to live in small apartments and were not able to afford the expensive homes in Redmond. This will continue to happen if Vision 2040 continues to focus so much attention on densifying the urban centers.

I-147-003

If you focus all of your attention on development in urban centers for businesses the small area of available land will drive up the cost of owning/leasing space making it less desirable for companies to locate and stay in the urban center areas. Plus, parking for employees will be a huge issue, unless you are able to get enough bus transit to operate during the times that coincide with the employers work hours, but the region will also need to provide more park and ride lots for employees to access the transit operations. For this to work more funding will be needed for bus transit in order to make it more flexible and practical in being able to get employees to work in a reasonable amount of time. More evaluation of the cost for businesses to be located in the urban centers should be performed.

Continuation of I-147-001

I-147-004

In regards to infill development in urban centers it is very expensive, not only for the

Continuation of I-147-001

1

(Comment continues on following page)

Response to Comment Letter

I-147-001 VISION 2040 recognizes a wide variety of development patterns and forms, i.e., different types of centers and compact communities. See the VISION 2040 Issue Paper on Subregional and Secondary Centers, as well as the Information Paper on the Cost of Sprawl.

I-147-002 VISION 2040 addresses this issue and promotes a variety of housing choices throughout the region.

I-147-003 Comment noted. VISION 2040 addresses this issue in both the Housing and Economic sections of the multicounty planning policies.

I-147-001 (continued) See response to previous I-147-001.

I-147-004 Issue best addressed at the local jurisdiction level.

I-147-001 (continued) See response to previous I-147-001.

purchase of existing buildings but then the demolition of the old buildings, hazardous waste removal, the high cost of construction (due to very limited building areas), cost of sprinkling large buildings, Fire Departments will need to purchase new equipment in order to handle fires (how is this going to get funded? Through new development charges?), the cost of insurance for large buildings has increased substantially over the past few years, and maintenance on large structures are much more expensive than smaller buildings. More research should be directed toward evaluating infill development costs and how it will make housing less affordable.

Not enough attention has been given to evaluating affordable housing. One issue has to do when development is occurring in the suburbs; it does not make financial sense to have low income housing in these areas. There are no public services, less jobs are available, most of those areas have little to no bus transportation, and when they are being requested to be placed in Master Planned Communities you are placing a burden on the homeowners paying their dues because most low income housing do not maintain a high standard for the aesthetics of their properties and buildings, which would bring down the values of the other properties in that community. And you also have an issue with the payment of dues for the homeowners association – it would not be fair for the other homeowners to have to subsidize the low income homes by their having to pay increased dues in order to cover the cost of maintaining the common areas, parks, and other amenities that everyone enjoys – this wo!
uld create an unfairness.

Evaluation of good planning measures through the developments of Master Planned Communities should be reviewed – they are a smart way to develop diversities of housing and job opportunities, while providing for areas of environmental protections, open space, and recreational areas for families.

Our children will be growing up in this region and will be the next generation seeking homes to live in – we need to make sure that there is a variety provided for them to have the right to choose where they want to live – not making their only choice as being in the urban centers. As planners at the various jurisdictions within this Puget Sound Region use this regional plan as a tool, as it is written today, they will make decisions causing development outside of urban centers to not be encouraged – thereby making it very difficult for property owners outside of the urban centers to develop – which would cause an unfairness for that property owner's rights. Is this truly offering economic opportunities for all, as your Vision Statement reads?

In regards to the Environmental Framework I don't see that you've given any attention toward our living in the Puget Sound region which is very unique with its critical areas (slopes, waterways, wetlands, etc.) causing a great hardship on property owners in trying to develop their land. Densities to match the upcoming population and need for employers will not be able to be met due to the large quantities of critical areas. More evaluation of the amounts of critical areas affecting the ability to develop should be performed.

Thank you for your time and efforts in putting together this regional plan in trying to help mold the future development of the Puget Sound Region and for taking into consideration my comments above. Please feel free to contact me if you should have any questions regarding my comments.

08.mailing list = yes
09.mailtype = email
mailto = vision2040@psrc.org,dmclaughlin@psrc.org
subject = Draft VISION 2040 Comment

Continuation of I-147-001

I-147-005

Continuation of I-147-001

I-147-006

I-147-007

I-147-005 Comment noted. See the Issue Paper on Housing.

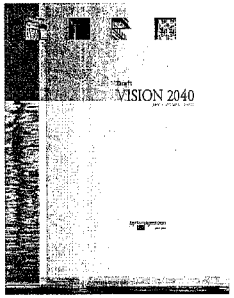
I-147-006 Comment noted.

I-147-001 (continued) See initial response to this comment.

I-147-007 Thank you.

2

I-073



Draft VISION 2040

And Supplemental Draft Environmental Impact Statement

Comment Form

What do you think about the draft regional growth strategy and multicounty policies in VISION 2040?

We want your input and need to hear from you!

The public comment period lasts from Monday, July 16 through Friday, September 7, 2007.

The public is encouraged to provide thoughts, ideas, and concerns on the Draft VISION 2040. Comments can be made in one of the following ways:

- By writing to Norman Abbott, State Environmental Policy Act (SEPA) Responsible Official, at the Puget Sound Regional Council, 1011 Western Ave, Suite 500, Seattle WA 98104-1035
- By visiting the Regional Council's Web site www.psrc.org. To submit a comment, go to the Comment section of the VISION update Web page and follow the instructions.
- By sending an email to vision2040@psrc.org.
- By attending any of the Regional Council's board, committee, or other meetings and submitting a comment. A public comment period is offered at the beginning of each meeting.
- By returning this comment form.

The comments that you make will become part of the public record for this project. Your thoughts will help decision makers as they finalize VISION 2040 in fall 2007. Responses to your comments will be provided in the Final Environmental Impact Statement.

Regional VIEW, the Regional Council's monthly newsletter, is one good way to stay informed and involved. To receive a print copy of *Regional VIEW*, visit http://www.psrc.org/publications/pubs/view/viewform.htm, or call 206-464-7090.

CONTACT INFORMATION:

At a minimum, please provide your name, the county in which you live, and ZIP Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

NAME Arthur L. Kaufman

ORGANIZATION Sierra Club - Executive Committee Member - Seattle Chapter

ADDRESS 6555 N.E. Windermere Road

CITY Seattle STATE WA ZIP 98105

E-MAIL arthurlkaufman@Yahoo.com ☒ CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.

COMMENTS:

Attending your August 1, 2007 meeting at the Seattle Center made me aware of the efforts of so many capable, dedicated people planning our communities future. One of your council members suggested that I submit in writing suggestions I made at the meeting.

The overarching concern we face is reducing global warming. It is proposed that Washington State reduce its greenhouse gases 2% a year to achieve an 80% reduction by 2050.

50% of greenhouse gas emissions in our region is from transportation- cars, trucks, buses, etc. Meeting the overall 2% a year reduction requires transportation to reduce its share by 2% a year.

New fuels, such as biodiesel, and more fuel efficient vehicles will not achieve this by 2050; hence, the only way to meet this requirement is by reducing the number of vehicles or vehicle/miles.

You project 1.7 million more people will be living in King, Kitsap, Pierce and Snohomish counties by 2040. A compatible transportation system meeting the 2% goal of reducing greenhouse gasses must be in place. Trucks will be needed to provide goods and services. Buses will probably increase as part of increased public transportation. Reducing personal use of autos and auto/miles is the only way to meet the 2% per year reduction of greenhouse gases. This also reduces congestion and the need for additional highways. Building new highways to meet transportation needs is wrong. It has been shown that if highways are built, more cars will fill them- exactly the opposite of what is required

I urge you to have the vision and courage to use the funds that would be misdirected if spent on highways and add them instead to arterial and branching public transportation by rail and buses.

I-073-001

I-073-002

PLEASE ADDRESS COMMENTS TO:

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

I-073-001 VISION 2040 has been revised to address this issue, with stronger policies and narrative related to greenhouse gas emissions (see climate change policies in the Environment section). Also, the Destination 2030 update will provide an additional opportunity to further address this issue. The Transportation section now has an expanded discussion of environmental issues as well as a subsection entitled "Sustainable Transportation" that includes policies that address transportation and the effects of emissions.

I-073-002 VISION 2040 promotes a balanced transportation system that provides choices. More detail and specific investments will be considered when Destination 2030 is updated.

I-155

Robin McClelland

From: Hudgins, Audrey [hudginsa@seattleu.edu]
Posted At: Friday, September 07, 2007 10:59 PM
Conversation: Public comment submission on draft VISION 2040
Posted To: Vision 2040
Subject: Public comment submission on draft VISION 2040

To the Puget Sound Regional Council:

I applaud the staff and contributors who have made VISION 2040 and its predecessors a compelling roadmap for growth in the Central Puget Sound Region. I hope that this document and its successors continue is impact well in to the future. I-155-001

As a newcomer to the process, I'm sure that my comments have already been shared by others who have a longer association with your organization. In that spirit, please accept my thoughts, presented in no particular order of importance.

1. VISION 2040 successfully highlights the importance of environmental justice (EJ). I recommend continuing to consider EJ in growth and development deliberations. In particular, I support its use as an evaluation criteria in growth strategy selection. I-155-002
2. I would like to compliment John Owen on his Ecosystem Conditions drawings. I-155-003
3. There appears to be a disconnect between the goals, policies and actions outlined in VISION 2040 and the gubernatorial and legislative initiatives coming out of Olympia. An example is the Governor's Climate Change Challenge, which in part sets the following goals: I-155-004

   • By 2020, reduce greenhouse gas emissions in the state of Washington to 1990 levels, a reduction of 10 million metric tons below 2004 emissions;
   • By 2035, reduce greenhouse gas emissions in the state of Washington to 25% below 1990 levels, a reduction of 30 million metric tons below 2004;
   • By 2050, the state of Washington will do its part to reach global climate stabilization levels by reducing emissions to 50% below 1990 levels or 70% below our expected emissions that year, an absolute reduction in emissions of nearly 50 million metric tons below 2004

   Judging from the information presented in VISION 2040, these goals appear to be unreachable or difficult to enforce if unrealized. Clearly, there is a correlation between energy consumption and economic productivity; I hope the statisticians are studying not only the probability of reaching these goals as articulated, but also divining the economic impact of goal progress.
4. VISION 2040 lacks a compelling commitment to public transportation. Based on the data presented on page II.29 of the SDIES, the Preferred Growth Alternative indicates 4.6% decline in single-occupancy vehicle (work trips). Essentially, VISON 2040 makes no call to action for creating fundamental change in this policy area. It is evident that a comprehensive public transportation system can have the greatest impact on the environment, development, the economy and quality of life, while providing for a higher degree of social equity. My question for the PSRC is this: "In 2040, will we be satisfied with nearly 75% of the residents in our region driving to work each day in a single occupancy vehicle?" I think the answer is no; I therefore urge a renvisioning of our transportation future. Perhaps simply setting goals for reduction in single occupancy vehicle use and urging legislation to support these goals would be a step in the right direction. Offering tax credits for use of public transportation to businesses, citizens or both could be another strategy. I-155-005 I-155-006 I-155-007
5. The regional growth strategy must include "carrots" and "sticks" to be an effective motivator for change. Examples follow: I-155-008
   a. Require a carbon emissions analysis in all Environmental Impact Statements for development projects.
   b. Require development projects to demonstrate their compliance with VISION 2040. I-155-009
   c. Reward good behavior when communities meet aspects of VISION 2040 with some type of I-155-010

(Comment continues on following page)

9/10/2007

I-155-001 Thank you.

I-155-002 Comment noted.

I-155-003 Comment noted.

I-155-004 VISION 2040 has been revised to address this issue. Climate change issues have been more fully addressed.

I-155-005 VISION 2040 has been revised to address this issue. The Transportation section now has a subsection entitled "Sustainable Transportation" that includes policies that address transportation and the effects of emissions. Furthermore, a new policy (MPP-T-24) calls for increasing the proportion of trips using alternatives to driving alone. The Destination 2030 update will provide an opportunity to refine this issue.

I-155-006 VISION 2040 has been revised to address this issue. MPP-T-24 calls for increasing the proportion of trips made by transportation modes as alternatives to driving alone.

I-155-007 Comment noted.

I-155-008 VISION 2040 has been revised to strengthen the climate change provisions. See, for example, new policy MPP-En-20.

I-155-009 VISION 2040 addresses this issue through policies that establish funding priorities and by establishing a monitoring program.

I-155-010 See response to I-155-009.

Comment Letter

incentive.

6. Expand the budgetary resources controlled by PSRC to provide for more effective regional growth management. A $160 million dollar budget only goes so far.
7. Jumpstart the process for developing and publishing the Greenspace Strategy. Its time has come.
8. In reference to the chart on page 58 (Central Puget Sound Region Economic Sector Employment and Forecast), "Other" should not be the biggest category. I recommend breaking down "Other" to illuminate the Services Sector more clearly.

I-155-013 I-155-011 I-155-012 Continuation of I-155-010

Respectfully submitted,

Audrey Hudgins
hudginsa@seattleu.edu
206.296.6981

Response to Comment Letter

I-155-011 VISION 2040 has policies related to funding. However, VISION 2040 does not call for PSRC to increase its staffing or budget resources.

I-155-012 VISION 2040 addresses this issue. For example, see En-Action-2.

I-155-013 VISION 2040 has been revised to address this issue.

Comment Letter

I-043

Robin McClelland

From: FormProcessing@psrc.org
Posted At: Thursday, August 09, 2007 8:49 AM
Conversation: Draft VISION 2040 Comment
Posted To: Vision 2040

Subject: Draft VISION 2040 Comment

Hello!
This is results of submitted form by 192.103.155.12.

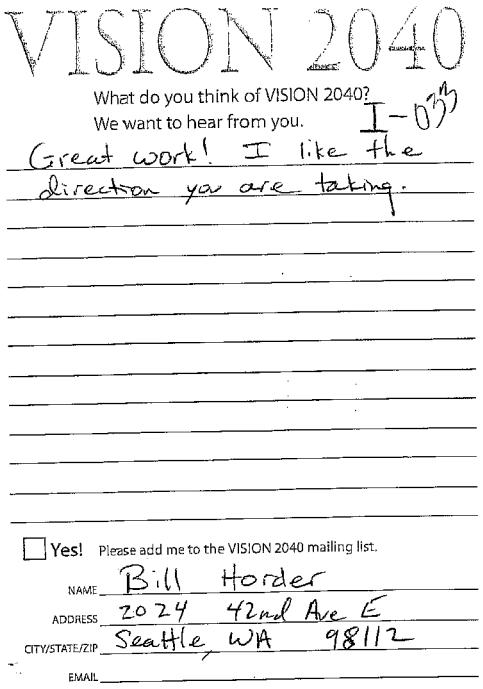
Submitter Email : FormProcessing@psrc.org

Fields:
01.name = Beth Wilson
02.address = 10280 Orchard Ave. SE
03.city = Olalla
04.state = WA
05.zip/postalcode = 98359
06.email = olallawoman@yahoo.com
07.comments = Your plan is good. It addresses important goals for preserving forest and agricultural lands, promoting densities sufficient to support transit so we can responsibly reduce global warming and provides for habitat restoration and the health of Puget Sound and Hood Canal. I think it reflects the values of the people who live in the Puget Sound basin, most of whom treasure the beauty, richness, and diversity of our natural resources and heritage. We all want to preserve those qualities in our environment and pass them on to our children and generations to come. I think your plan makes that possible. Thank you!
mailto = vision2040@psrc.org,dmclaughlin@psrc.org
subject = Draft VISION 2040 Comment

I-043-001

Response to Comment Letter

I-043-001 Thank you.



VISION 2040

What do you think of VISION 2040?
We want to hear from you. I-033

Great work! I like the direction you are taking.

☐ Yes! Please add me to the VISION 2040 mailing list.

NAME Bill Horder
ADDRESS 2024 42nd Ave E
CITY/STATE/ZIP Seattle WA 98112
EMAIL

I-033-001

I-033-001 Thank you.

I-061

August 22, 2007

Caitlin McKee-University of Washington graduate '07
2732 Langridge Loop NW
Olympia, WA 98502
(360) 943-2319
caitymm@hotmail.com

Hilary Dahl-University of Washington student
533 NE 82nd St
Seattle WA 98115
(206) 525-5879
hilaryjdahl@yahoo.com

Public Comment for the Vision 2020 Update Draft

We commend the PSRC on their well-formulated Vision 2020 Update Draft. We are University of Washington students in the Community, Environment and Planning program in the Department of Urban Design and Planning. Since January we have been researching the experience of residential density and its urban design application for our senior project. We decided to do this research because we identified a problem that there is a disconnect between policies and preferences relating to urban density. Current urban planning policies at many scales are guiding us towards living in denser urban environments, yet research shows that people commonly prefer living in lower density neighborhoods. We explored how humans experience urban density and how urban design can influence the perception of density. After spending six months researching this topic in the context of anticipated growth of the Puget Sound Region, we feel that we can speak to the nature of the complexity of this issue. We are pleased to have the opportunity to participate in this public comment process. The following is our comment on the Multi-County Planning Policies Development Patterns section.

We agree with the positive tone of the document because in our research we found that density was treated by many planning professionals as a "necessary evil" to be tolerated. We believe that talking about the positive aspects of density is critical to gaining public support for dense communities. We appreciate that growth and compact design are embraced as a potential for vibrant communities. We encourage you to maintain this positive tone in the final document.

We are also pleased to see the inclusion of urban design as its own section under "Elements of Orderly Development." Urban design is paramount in shaping the built environment to reflect the values and facilitate the needs of communities. We feel it is important to articulate the role of urban design in a regional plan.

Due to the importance of the Urban Design element, we would like to suggest further strengthening it with an additional MPP. MPP's DP-39 through DP-47 outline *what* urban design can accomplish, however they lack explanation as to *how* urban design

(Comment continues on following page)

I-061-001

I-061-002

I-061-003

I-061-001 Thank you.

I-061-002 Thank you.

I-061-003 VISION 2040 has been revised to expand the discussion of design issues. See "Elements of Orderly Development and Design" in the Development Patterns section.

can achieve this. Without guidance as to how this will be done the current Urban Design MPP's do not facilitate implementation. In our research we explored how the urban form can be broken down into three scales, city, site, and building, with corresponding design strategies for each one. When all scales are taken into account, urban design strategies can be more effective. With this holistic approach the three scales can work together so that objectively dense environments are not perceived to be unpleasantly crowded. Therefore we propose the following additional MPP:

"Use urban design strategies that recognize all three scales of the urban form: city, site, and building. This can be best achieved, for example, by designing with an awareness of contextually sensitive infill development, site relation to the street, and building shape."

We feel that the addition of this new MPP under the Urban Design element will facilitate the creation of visual cues that prompt positive perceptions of space. While we understand that social factors and attitudes play an important role in the experience of the built environment, urban design strategies are a helpful tool in creating pleasant urban environments and are essential to include in this regional plan. This will promote the urban growth strategy by increasing the desirability of urban environments.

The strength of the PSRC Vision 2020 Plan is in the transparency of the process and the encouragement of public participation at every step. We appreciate the inclusion of the public to give this regional planning document that affects so many citizens to give it validity and authenticity.

Respectfully,

Caitlin McKee

Hilary Dahl

Continuation of I-061-003

I-061-004

I-061-004 Thank you.

Comment Letter

I-014

Robin McClelland

From: RCAA Office [rcaa@earthlink.net]
Posted At: Tuesday, July 31, 2007 4:19 PM
Conversation: request for change in terminology
Posted To: Vision 2040

Subject: request for change in terminology

Dear Staff:

(Att'n Mr Abbott)

It would be MUCH appreciated if you would drop the term "regional geographies" in the "Vision 2040" documents.

"Geography" has a fairly well-agreed-to meaning. There are various types of geography, to be sure, so one can appropriately write 'geographies' -- but not very often. Some examples of different areas of speciality within the broader science: physical geography; human; political; historical ... And then there are geographies for particular areas: U.S. geography, for example.

But the use to which you are putting the expression 'regional geographies' is a jarring & very non-standard use of the term "geography".

Please come up with something better.

Chas. H.W. Talbot
Operations Manager
Regional Commission on Airport Affairs
19900 4th S.W.
Normandy Park, Washington 98166-4043
Tel: 206.824.3120
www.rcaanews.org

I-014-001

(Comment continues on following page)

Response to Comment Letter

I-014-001 This idea was considered in the VISION 2040 process and not accepted.

I-014p2

Robin McClelland

From: Sheila Rogers
Sent: Monday, September 10, 2007 9:43 AM
To: Robin McClelland
Subject: FW: Editorial comment on "Vision 2040"

-----Original Message-----
From: RCAA Office [mailto:rcaa@earthlink.net]
Sent: Thursday, September 06, 2007 3:01 PM
To: Sheila Rogers
Subject: Editorial comment on "Vision 2040"

Dear Ms Rogers:

In the cover letter for the supplemental draft environmental impact statement of "Vision 2020", your name is given as the appropriate person to whom to address comments, at the e-mail address given above.

Without foreclosing the possibility of making substantive comments, I do have one editorial comment: The word "geography" (as commonly understood) simply does not bear the meaning that the "Vision 2040" paperwork gives to the word. "Geography" is a learned discipline, a science. A geographer seeing the term "regional geography" surely would understand that the writer has in mind the *study* of geography on a regional basis. "Vision 2020" is not about the discipline, the science, of geography. It's hard to know precisely what PSRC means by "regional geography", but a better, less confusing, term should be found & used.

P.S. The use of the word "regional" in this context adds to the confusion. In almost every PSRC publication the term "region" or "regional" refers either to the PSRC itself, or the four-county area that comprises the PSRC's area of jurisdiction. But "regional geographies" is being used in the "Vision 2040" paperwork to refer to smaller areas within the four-county area.

Why not use the relatively straightforward expression, "subarea", or perhaps "subregion"? The general meaning of some such an expression would be intuitively obvious, would not jar the ear of the reader, & would avoid a confusing use of "region / "regional" for two quite different concepts.\

Yours truly,

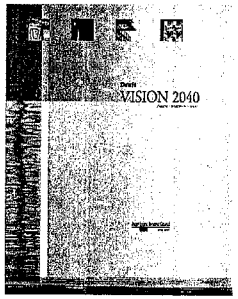
Chas. H.W. Talbot
Operations Manager
Regional Commission on Airport Affairs
19900 4th S.W.
Normandy Park, Washington 98166-4043
Tel: 206.824.3120
www.rcaanews.org

Continuation of I-014-001

I-014-002

I-014-002 This idea was considered in the VISION 2040 process and not accepted.

I-112



Draft VISION 2040

And Supplemental Draft Environmental Impact Statement

Comment Form

What do you think about the draft regional growth strategy and multicounty policies in VISION 2040?

We want your input and need to hear from you!

The public comment period lasts from Monday, July 16 through Friday, September 7, 2007.

The public is encouraged to provide thoughts, ideas, and concerns on the Draft VISION 2040. Comments can be made in one of the following ways:

- By writing to Norman Abbott, State Environmental Policy Act (SEPA) Responsible Official, at the Puget Sound Regional Council, 1011 Western Ave, Suite 500, Seattle WA 98104-1035
- By visiting the Regional Council's Web site www.psrc.org. To submit a comment, go to the Comment section of the VISION update Web page and follow the instructions.
- By sending an email to vision2040@psrc.org.
- By attending any of the Regional Council's board, committee, or other meetings and submitting a comment. A public comment period is offered at the beginning of each meeting.
- By returning this comment form.

The comments that you make will become part of the public record for this project. Your thoughts will help decision makers as they finalize VISION 2040 in fall 2007. Responses to your comments will be provided in the Final Environmental Impact Statement.

Regional VIEW, the Regional Council's monthly newsletter, is one good way to stay informed and involved. To receive a print copy of *Regional VIEW*, visit http://www.psrc.org/publications/pubs/view/viewform.htm , or call 206-464-7090.

CONTACT INFORMATION:

At a minimum, please provide your name, the county in which you live, and ZIP Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

NAME Craig E. Jensen

ORGANIZATION

ADDRESS P.O. Box 1112

CITY Silverdale STATE Wa. ZIP 98383

E-MAIL ☒ CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.

COMMENTS:

We do not want to be in PSRC.
It Take's AWay my Constitutional Right
to have a repersentative goverment

I-112-001

PLEASE ADDRESS COMMENTS TO:

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

I-112-001 Comment noted. Note that Kitsap County has been a member of PSRC, and its predecessor agencies, since the 1950s.

I-007

Robin McClelland

From: FormProcessing@psrc.org
Posted At: Sunday, July 29, 2007 11:50 AM
Conversation: Draft VISION 2040 Comment
Posted To: Vision 2040

Subject: Draft VISION 2040 Comment

Hello!
This is results of submitted form by 24.18.154.56.

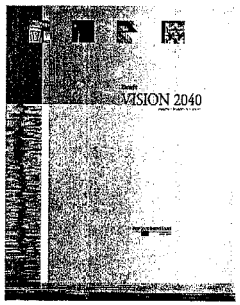
Submitter Email : FormProcessing@psrc.org

Fields:
01.name = Cynthia Groehnert
02.address = 1122 8th av s
03.city = Edmonds
04.state = wa
05.zip/postalcode = 98020
06.email =
07.comments = Seattle is concerned with the environment but doesn't seem to address car pollution & massive congestion on the I-5 Everett-Seattle corridor. Why can't we put more SOUND TRANSIT TRAINS on between Everett and Seattle. At present there are only two trains at peak hours AND NO TRAINS during the day into Seattle. Plus many buses are full to capacity standing room only. It seems that you are IGNORING a great resource in the trains we already have. Snohomish has massive probles with traffic congestion. Your traffic solutions seems to be focused in King County & Tacoma area. We need MORE TRAINS. PLEASE HELP SNOHOMISH DEAL WITH THEIR HUGE CONGESTION PROBLEMS & also help the ENVIRONMENT.
"GIVE US MORE TRAINS"
08.mailing list = yes
09.mailtype = USmail
mailto = vision2040@psrc.org,dmclaughlin@psrc.org
subject = Draft VISION 2040 Comment

I-007-001

I-007-001 Comment noted. The Destination 2030 update will provide an opportunity to address this issue.

1-084



Draft VISION 2040

And Supplemental Draft Environmental Impact Statement

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CONTACT INFORMATION:

At a minimum, please provide your name, the county in which you live, and ZIP Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

NAME Dan Goebel

ORGANIZATION Kitsap County PO Box 588

ADDRESS Keyport WA 98345-0588

CITY Poulsbo WA STATE 98370 ZIP

E-MAIL ☐ CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.

COMMENTS:

Draft Vision 2040 and the PSRC are not right for Kitsap County.
RCW 36.70A.210(7) "Multi-county planning policies shall be adopted by two or more counties, each with a population of four hundred fifty thousand (450,000) or more, with contiguous urban areas and may be adopted by other counties."
The population of Kitsap County is about 235,000 and it does not have contiguous urban areas with King, Pierce, or Snohomish counties. I-084-001

Furthermore, an appointed council by a State Governor should not be given the power to subvert local government officials that are elected by the people. I-084-002

The existing sea of regulations has created a quagmire for builders and homeowners who wish to improve their property. As it is now, it can take well over a year to get a building permit in a growth area, and this agency will only add more frustration to the existing sea of over regulation. I-084-003

PLEASE ADDRESS COMMENTS TO:

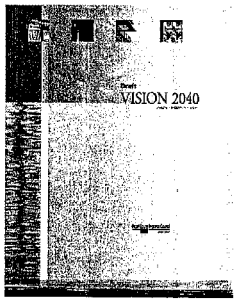
Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

I-084-001 Comment noted. Note that Kitsap County has been a member of PSRC, and its predecessor agencies, since the 1950s.

I-084-002 Comment noted. PSRC members are not appointed by the governor. They are government officials from local jurisdictions in the four-county region who are selected to serve on PSRC boards.

I-084-003 Comment noted.

1-082



Draft VISION 2040

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- By writing to Norman Abbott, State Environmental Policy Act (SEPA) Responsible Official, at the Puget Sound Regional Council, 1011 Western Ave, Suite 500, Seattle WA 98104-1035
- By visiting the Regional Council's Web site www.psrc.org. To submit a comment, go to the Comment section of the VISION update Web page and follow the instructions.
- By sending an email to vision2040@psrc.org.
- By attending any of the Regional Council's board, committee, or other meetings and submitting a comment. A public comment period is offered at the beginning of each meeting.
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CONTACT INFORMATION:

At a minimum, please provide your name, the county in which you live, and ZIP Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

NAME DAN L. HICKS

ORGANIZATION

ADDRESS 4710 CALAMITY LANE NW

CITY BREMERTON STATE WA ZIP 98312-9414

E-MAIL ☐ CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.

COMMENTS:

RCW 36.70A.210(7): Two or more counties to merge into planning agencies would seem to require counties with similar needs and objectives to work together. I personally do not see Kitsap County having those similar needs and objectives to King, Piece or Snohomish counties. Kitsap looses nearly all our "say" when the other three metropolitan counties make our choices for us. Kitsap should more realistically join with Mason and Jefferson counties if we "must" join with other counties to seek rural status protections.

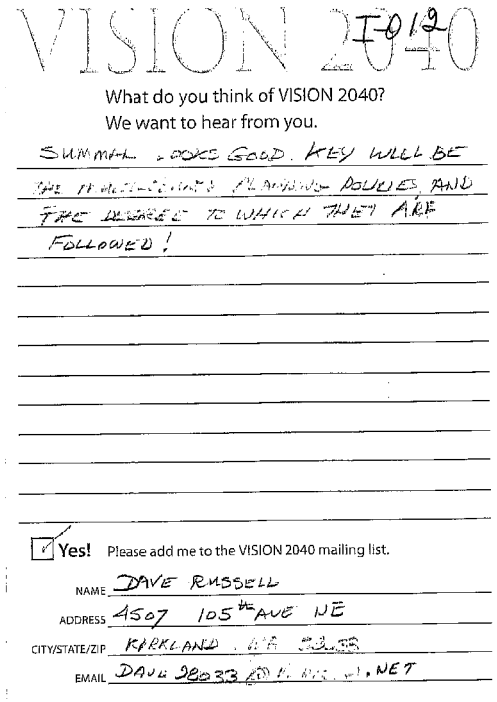
Don L. Hicks
9/3/07

I-082-001

PLEASE ADDRESS COMMENTS TO:

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

I-082-001 Comment noted. Note that Kitsap County has been a member of PSRC, and its predecessor agencies, since the 1950s.



VISION 2040 I-012

What do you think of VISION 2040?
We want to hear from you.

SUMMARY LOOKS GOOD. KEY WILL BE THE IMPLEMENTATION PLANNING POLICIES AND FAC BASED TO WHICH THEY ARE FOLLOWED!

☑ Yes! Please add me to the VISION 2040 mailing list.

NAME DAVE RUSSELL
ADDRESS 4507 105TH AVE NE
CITY/STATE/ZIP KIRKLAND, WA 98033
EMAIL DAVE98033@YAHOO.NET

I-012-001

I-012-001 Thank you. Comment noted.

Comment Letter

I-001

Robin McClelland

From: David F. Plummer [pdf3@comcast.net]
Posted At: Monday, July 23, 2007 10:54 AM
Conversation: Comment on Vision 2040
Posted To: Vision 2040

Subject: Comment on Vision 2040

Hello!

The Regional growth strategy depicted in the 8-page 'brochure' for 'Vision 2040' will only intensify the auto/truck congestion on Regional highways, freeways and major arterials, and lead to further degradation in the Region's environment. This strategy is primarily designed to satisfy the Regional power brokers, and has been formulated with no substantive public input. PSRC, Sound Transit, and the Region's elected and appointed bodies are dominated by persons interested in continuing to expand and intensify the Region's commercial/retail activity, increase the Region's land rents, and depreciate the Region's environmental resources. The 'Vision' fails to recognize that there are only two feasible solutions to further degradation in the Region's environment: (1), reduce the population growth allocated to the Region by the State OFM; and (2), adopt policies that will result in deployment of population and employment to the Region's 'hinterlands.'

I-001-001
I-001-002
I-001-003
I-001-004

Regards,

David F. Plummer

14414 NE 14th Place
Bellevue, WA 98007

1

Response to Comment Letter

I-001-001 Do not concur. The Regional Growth Strategy improves transportation as compared to current plans. See EIS for more information.

I-001-002 The VISION 2040 update process included an extensive public outreach effort and resulted in broad participation.

I-001-003 The region did not analyze alternatives that assumed less growth than the forecast for 2040. This decision recognized the charge of the state Growth Management Act.

I-001-004 Early analysis of various growth scenarios considered possible dispersed growth alternatives. However, compact growth alternatives were identified as more viable and cost-effective.

VISION 2040

I-011

What do you think of VISION 2040?
We want to hear from you.

OVERALL, IT LOOKS FINE. PLEASE KEEP IN MIND THE FOLLOWING ITEMS:

1. OUR ROADS WERE NOT DESIGNED TO HANDLE THE HUGE POPULATION GROWTH IN THE PAST 15 YEARS. THIS "MESS" NEEDS TO BE FIXED. THAT SHOULD BE PRIORITY #1

2. NOT EVERYONE WANTS TO LIVE IN ~~A~~ ~~HOUSING~~ HOUSING DEVELOPMENTS. ALSO, NOT EVERYONE WANTS A HOUSING DEVELOPMENT BUILT IN THEIR NEIGHBORHOOD, ~~THEIR~~ THEY'RE CHEAP (POOR QUALITY), CROWDED AND ADD CONGESTION TO THE ROADS (SEE #1 ABOVE)

I-011-001

I-011-002

☒ Yes! Please add me to the VISION 2040 mailing list.

NAME DAVID SCHATZ

ADDRESS 2208 60TH ST SE

CITY/STATE/ZIP EVERETT WA 98203

EMAIL toolbarn12@comcast.net

I-011-001 Comment noted.

I-011-002 Comment noted.

Comment Letter

I-072

September 3, 2007 1/2

Norman Abbott, SEPA Responsible Official
Puget Sound Regional Council
1011 Western Avenue, #500
Seattle, WA 98104-1035

Re: Draft Vision 2040 and Supplemental Draft Environmental Impact Statement

Dear Mr. Abbott:

I have been pleased with the overall documentation, workshops, and outreach of the Draft Vision 2040 preparation and the overall analytic approach used by the PSRC in formulating and analyzing the alternatives.

There is, however, one very important area where I find the plan and environmental analysis inadequate: although several alternatives are addressed for shaping future growth **patterns** (year 2040), there is no analysis of alternative **levels (quantity) of growth**.

It is clear that the plan is essentially based on the linear trend in population and employment growth from 1960 to 2000 extended forward linearly to a 2040.projection of a continued tremendous amount of growth. Given the substantial environmental deterioration of the Puget Sound region over the past 40 or more years stemming from substantial growth – and the coming global warming and energy crises – Vision 2040 should include an analysis of reduced-growth scenarios (RGS).

Base-year analysis results for transportation, water quality, air quality, etc. may give a partial, or limit-assessment (no-growth), of RGS but may not adequately account for changing technologies (e.g., future reduction in unit emissions from motor vehicles). It is noted that the Transportation analysis (Section 5.3 in the SEIS paper document which I reviewed) does in fact give base year transportation performance measures, with a rather bleak projection of huge increase in delay and congestion. However, the document is deficient in that it gives no baseline performance measures for 5.4 Air Quality nor for 5.6 Water Quality. 5.10 Energy provides no metrics at all – why is there no analysis of electrical power needs?

Regional and state planning officials should not use the Growth Management Act and "political constraints" as an excuse for failing to address RGS. GMA and other statutory bases may currently not allow us to actually take significant steps to reduce the level of future growth, but they do not prevent us from assessing the "what-if" impacts of reduced growth.

The public deserves to know what the potential benefits and impacts are of reduced growth compared to ever-increasing trend-line growth -- however "smart" and efficient the latter -- that characterizes local and regional planning to date. With such knowledge

(Comment continued on following page)

I-072-001
I-072-002
I-072-003
I-072-004

Response to Comment Letter

I-072-001 Thank you.

I-072-002 The Regional Council did not analyze alternatives that assumed less growth than the 2040 regionwide forecast of 1.7 million new residents and 1.2 million new employees. This decision recognized the charge of the state Growth Management Act to manage, rather than control, growth and the desire to remain consistent with the State Office of Financial Management (OFM) population forecast process. Studying alternatives that are consistent with the OFM process makes VISION 2040 more useful and understandable to local governments as they apply regional guidance in developing growth targets.

I-072-003 Given the regional scale of the alternatives, and the large variation of conditions among localized areas, the level of detail for the alternatives and the environmental analysis has been conducted at a broad programmatic scale. Localized impacts of growth could vary, but would depend on more specific actions that would be considered and approved through local or project-level processes.

I-072-004 See response to I-072-002.

Norman Abbott, SEPA Responsible Official
Puget Sound Regional Council
1011 Western Avenue, #500
Seattle, WA 98104-1035
Vision 2040 Plan and SEIS, continued

Continuation of I-072-004

we may decide to endeavor to change our planning law to allow implementation of policies and measures to slow and reduce the rate of growth in our region.

Sincerely,

Dennis Neuzil, D.Eng., P.E.
2307 – 94th Avenue NE
Clyde Hill, WA 98004
425-455-1419 dennisneuzil@foxinternet.com

Red-discTran,AdvocSept07

UNIVERSITY OF WASHINGTON
SEATTLE, WA 98195

I-158

Community, Environment and Planning
The Interdisciplinary Undergraduate Program
with Urban Design and Planning
College of Architecture and Urban Planning
September 7, 2007

Mr. Norman Abbott
PSRC
1011 Western Avenue
Suite 500,
Seattle WA, 98101

Dear PSRC Policy Board Members, Staff Committee Members and Staff:

The Draft Vision 2040 7/07 is an important piece of work and all who have contributed to its development are to be congratulated, for the content of course but also for the generous and inclusive process that it represents. How we do things is still as important as what we do. I-158-001

The goals and policies that emerge from this process will stand as stakes in the ground for setting the region's future, but as we all know, the matter of how we carry out these policies will be what distinguishes this region from all of the others. Please, please, please keep your eye on implementation as the final Vision 2040 is developed. I-158-002

We have to be as bold in our implementation as we are in our visions for the region. One essential component of regional plan implementation is having a strong, sustaining capacity for regional guidance, In our region this capacity is known as PSRC. Fearing that modesty in PSRC – modesty is often a hallmark of urban planning – will prevent it from calling for strengthening the capacity of itself, I write to urge that this objective be accorded the **highest priority**. We cannot take this region where it needs to go without investing in and maintaining PSRC itself. Almost all polices in the Draft assume a regional capacity for accurate, timely, trusted on-going assessment of where things are, how they are changing and what's going on in the world around us. All successful corporations, institutions and social organizations rely on and invest in strong R&D. Not every now and then, but all the time, on – going. Competitive, smart, aware regions need to do the same thing. I-158-003

Our resources of persons, geography, infrastructure, economy and cultural history joined with our social and institutional processes are all we have to construct this future region. Knowing what all of these are and how they work together and keeping all of the region extremely well informed will determine the shape and quality of this imagined regional future.

The Draft's Implementation section is carefully worded and structured to separate implementation from the goals and policies. While I appreciate the reasoning – I assume it is to keep the focus on goals and policies first – it is not enabling us to adopt strong language supporting the role of regional guidance via PSRC's associated activities. To implement the Plan, we must have the mechanisms to I-158-004

410 Gould Hall Box 355740 TEL. (206) 543 4191 FAX (206) 685 9597
http://depts.washington.edu/cep/

(Comment continues on following page)

I-158-001 Thank you.

I-158-002 Concur.

I-158-003 Comment noted. See Multicounty Planning Policy actions and the monitoring program.

I-158-004 Comment noted. VISION 2040 has been revised to address this issue, and has added a monitoring policy as well as an action. See MPP-G-3 and G-Action-2.

UNIVERSITY OF WASHINGTON
SEATTLE, WA 98195

inform and to guide implementation. We must have a strong PSRC[1] for this. The Draft acknowledges Measures and Monitoring – which is good, but it doesn't sound like it is part of the plan. It's like notes in the margin. Unless we get implementation and the capacity to conduct cutting edge, 21st century regional planning and implementation into the plan, we are missing half of the boat.

All of the Regional Design Strategy (RDS)– a separate report – informs the Draft and this would be my second and last plea in the revision process. Keep your eye on Design. The Draft has numerous policies that acknowledge the role of design and the quality of design in the region's future. Design is an absolutely essential component of tomorrow's competitive region. There is research to support this and as we move into the future, we must add to the region's capacity to understand and guide its design qualities. Again, there is an essential role for PSRC in such an effort (as noted in the RDS).

Finally, regions are the future. They are the strong players in this global world. The ones that get a handle on **being** regions – not just referring to themselves as a region – will be the winners. This will take the kind of work represented in the DRAFT. Kudos.

Dennis M. Ryan
Associate Professor Planning and Urban Design, and Architecture
Director, Community, Environment and Planning program.

[1] If it is awkward to refer to PSRC itself in the Plan, use a shorthand descriptive language that refers to the kind of work PSRC performs, and could perform, in the context of our future region.

410 Gould Hall /Telephone : (206) 543 – 4190

I-158-004 Continuation of I-158-004

I-158-005

I-158-006

I-158-005 VISION 2040 has addressed this issue. "Regional Design" has been moved forward in the subsection "Elements of Orderly Development and Design" in the Development Patterns section. The word "design" was added to the title.

I-158-006 Concur.

Comment Letter

Donald F. Padelford
1221 First Avenue
Suite 2111 98101
POB 2846
Seattle, Washington 98111
206-262-1155
fax 262-1930
dfp07@dfpnet.net

I-117

September 7, 2007

Norman Abbott
SEPA Responsible Official
PSRC
1011 Western Avenue, Suite 500
Seattle, WA 98104

vision2040@psrc.org
via email and post

Re Vision 2040, Supplemental DEIS

Among the policy changes in this EIS is
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.*

Congestion pricing of even one freeway lane each way would, if properly applied, create free-flow conditions in that lane, even at the height of rush hours. Applied to existing and prospective HOV lanes, this would produce a network of so-called HOT lanes. Buses on these lanes would therefore move at highway speeds at all times. Buses in free-flow would preclude the need for the proposed tens-of-billions-of-dollars regional light rail system, making such a system largely redundant. And the funds allocated to this prospective LRT system could be therefore allocated to other transit and/or transportation needs. I-117-001

Therefore, the region should institute a policy of abandoning further construction of light rail in favor of Bus Rapid Transit on freeway HOT and arterial bus-only lanes. I-117-002

I would like to see this policy reflected in the final EIS.

Donald F Padelford

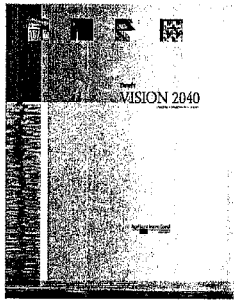
\20070907psrcDEIS

Response to Comment Letter

I-117-001 Comment noted.

I-117-002 VISION 2040 promotes a balanced transportation system, which includes light rail. However, the Destination 2030 update will provide an additional opportunity to further develop this issue.

I-086



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- By sending an email to vision2040@psrc.org.
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CONTACT INFORMATION:

At a minimum, please provide your name, the county in which you live, and ZIP Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

NAME Donna and Harvey Hulbert

ORGANIZATION 4635 Seabeck Hwy NW

ADDRESS Kitsap County

CITY Bremerton STATE Wa. ZIP 98312

E-MAIL _____ ☐ CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.

COMMENTS:

Draft vision 2040 is usurping local control even more than the Growth management act. At least a resource for citizens to protest to a illegable hearings board, then to a court, not so with "2040". The vision has a total disregard for any individual rights and for property rights. The people that propose this should try to understand the full impact of Thomas Jeffersons statement, "The small land-owners are the most precious part of the state." This is so far from the visions of our forefathers that I can not believe we have come to this proposal.

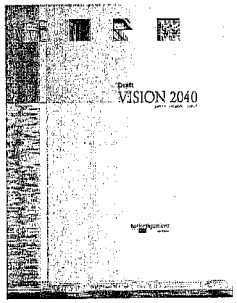
I-086-001

PLEASE ADDRESS COMMENTS TO:

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

I-086-001 VISION 2040 is within the authority of the Regional Council's mandates under state law (such as the Growth Management Act {see "The State of Washington's Growth Management Act and Related Laws - 2007 RCW Update"}, the Clean Air Washington Act, the Interlocal Cooperation Act), federal law (such as the Safe, Accountable, Flexible, Efficient, Transportation Equity Act -- a Legacy for Users, the Presidential Executive Order 12898 on Environmental Justice, the Clean Air Act), its Interlocal Agreement with its members, as well as the requirements related to the designations as the Regional Transportation Planning Organization, Metropolitan Planning Organization, and Economic Development District for the central Puget Sound region.

I-077



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NAME Dorothy Guice

ORGANIZATION ———

ADDRESS P.O. Box 924

CITY Paulsbo STATE WA ZIP 98370

E-MAIL dot_guice@hotmail.com ☒ CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.

COMMENTS: ~~Testimony~~ Page 1

I have read much of your Vision 2040 & can support it & almost any page and find some statement or "policy" with which I disagree, & will comment on only four.

Page 24, fourth paragraph: "The region will face environmental challenges . . . from the global . . . climate change"

I do not believe that global warming is created by human beings. Many well-educated, credible scientists believe as I do. The sun controls the heat on Earth. It is now in a state of high radioactivity. If the sun disappears tomorrow all life will perish. The reason many scientists and researchers promote man-made global warming is in the phrase "Follow the money." They know that they can obtain grant money from the government or non-profit organizations only by promoting the man-made global warming frenzy. The roots of the man-made global warming theory are written as Agenda 21 in the Charter of the United Nations. The Charter including Agenda 21 is on the U.N.'s website. You can look at it there as I have.

Page 30, MPP-Env 11: "Identify and protect wildlife corridors inside the urban growth area and outside the urban growth area." I'm assuming that means rural areas. The rural lands owned by my husband and me has many animals which are free to pass across it. Your policy would make it impossible for us to fence our land thus destroying our right to manage the property we legally purchased. We still have some families in Kittitas County who own cattle & sheep. How will they pasture their animals?

I-077-001

I-077-002

PLEASE ADDRESS COMMENTS TO:

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

I-077-001 Comment noted.

I-077-002 Comment noted. Note that this policy does not speak to, nor reference, fences. They are never mentioned in VISION 2040.

COMMENTS: continued - 1

Page 32, first line: "The quality of the water flowing out of the region — including Puget Sound — should be assessed as or better than the water quality entering the region."

The great majority of water entering Kitsap County is rain water. If we retain all Kitsap County water to Puget Sound and Hood Canal as pure as rain water, it will have no nutrients which salmon and other fish need. These needed nutrients are picked up in the streams from rotting animal and plant life and also animal excrement. The fish would starve in water which is "too clean."

Page 48, Part II: Housing

Goal: "The region will preserve, improve, and expand its housing stock to provide a range of affordable, healthy, and safe housing choices to every resident in the region. The region will continue to promote fair and equal access to housing for all persons."

This statement is not only misleading; it is an untruth. Under your Vision 2040 as one, including my adult grandchildren and great-grandchildren who are now graduating from high school, will have any choice. They will live in a forest of high-rise apartment buildings with no private vehicles or, if they are extremely fortunate, they will be very rich and able to afford one of the five, ten, twenty, or forty acre plots with a house upon the one acre which was permitted to be cleared for that purpose.

PLEASE ADDRESS COMMENTS TO:

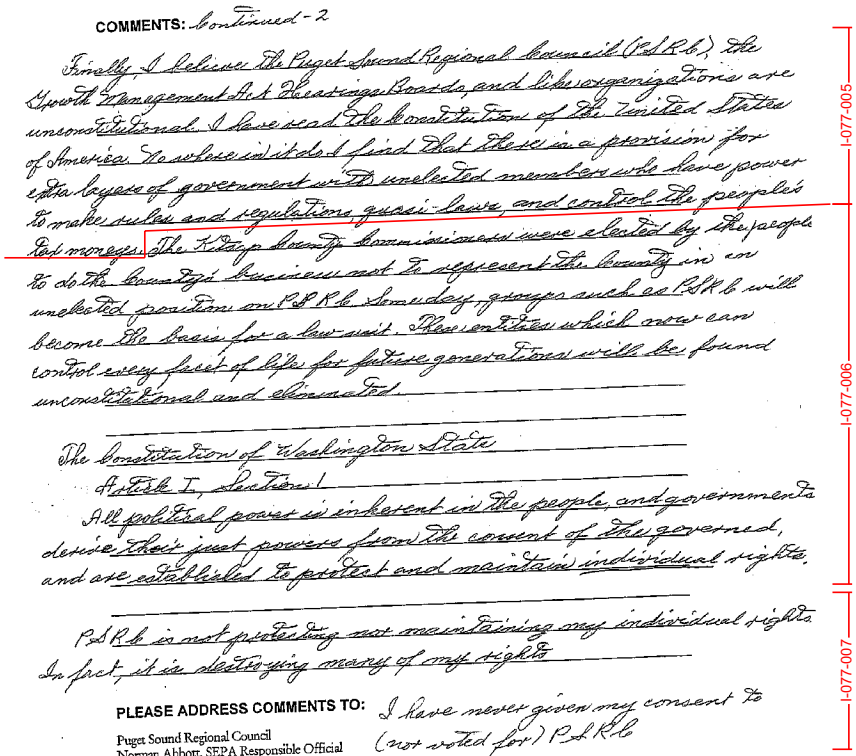
Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

I-077-003

I-077-004

I-077-003 See the Endangered Species Act and other legislation concerning fish and clean water. Also see the Issue Paper on the Environment.

I-077-004 Comment noted. The housing provisions in VISION 2040 call for expanded housing choices.



COMMENTS: Continued - 2

Finally, I believe the Puget Sound Regional Council (PSRC), the Growth Management Act Hearings Boards, and like organizations are unconstitutional. I have read the Constitution of the United States of America. Nowhere in it did I find that there is a provision for extra layers of government with unelected members who have power to make rules and regulations, quasi-laws, and control the people's lives money. The King County Commissioners were elected by the people to do the county's business and to represent the county in an unelected position on PSRC. Someday, groups such as PSRC will become the basis for a law suit. These entities which now can control every facet of life for future generations will be found unconstitutional and eliminated.

The Constitution of Washington State

Article I, Section 1

All political power is inherent in the people, and governments derive their just powers from the consent of the governed, and are established to protect and maintain individual rights.

PSRC is not protecting nor maintaining any individual rights. In fact, it is destroying many of my rights.

I have never given my consent to (not voted for) PSRC

PLEASE ADDRESS COMMENTS TO:

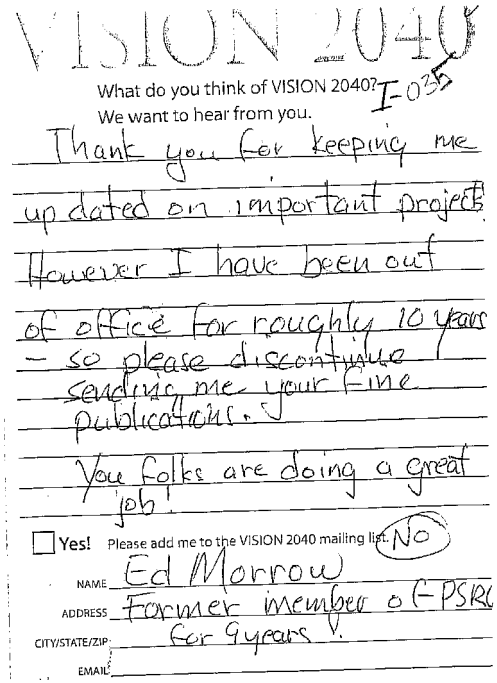
Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

I-077-005
I-077-006
I-077-007

I-077-005 Comment noted. See the federal and state legislation regarding MPOs, RTPOs, and related laws and provisions.

I-077-006 Comment noted.

I-077-007 Comment noted.



VISION 2040

What do you think of VISION 2040? I-035
We want to hear from you.

Thank you for keeping me up dated on important projects. However I have been out of office for roughly 10 years - so please discontinue sending me your fine publications.

You folks are doing a great job!

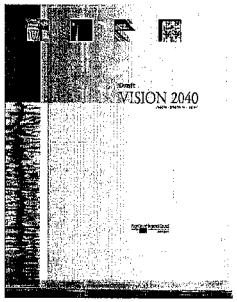
☐ Yes! Please add me to the VISION 2040 mailing list. NO

NAME Ed Morrow
ADDRESS Former member of EPSRC for 9 years
CITY/STATE/ZIP
EMAIL

I-035-001

I-035-001 Comment noted.

I-024



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NAME EDWARD MOORE

ORGANIZATION

ADDRESS 24812-12th Av S

CITY DES MOINES STATE WA ZIP 98198

E-MAIL edmoore2@juno.com ☐ CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.

COMMENTS:

Policies should address performance and enforcement. Otherwise, plans are useless (a waste).

I-024-001

For planning, design & efficiency, look @ what works good e.g. schools - catholic schools; railroads - Japan; Use of Natural Resources - Europe.

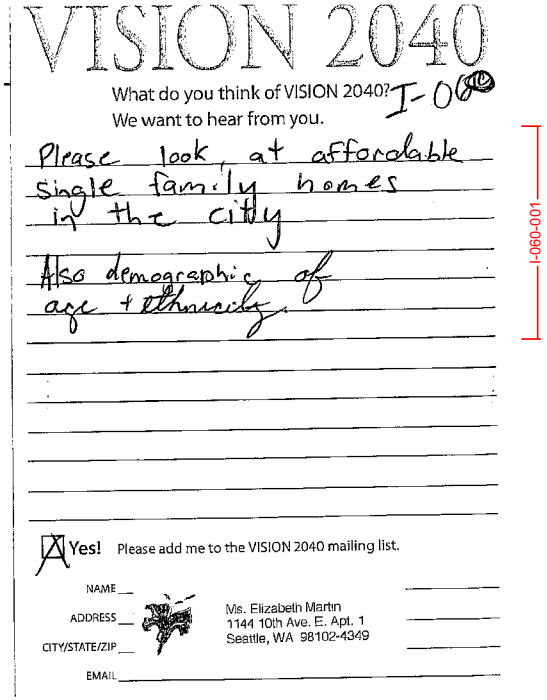
I-024-002

PLEASE ADDRESS COMMENTS TO:

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

I-024-001 Comment noted. See Part VI: Implementation. Monitoring provisions and related measures have been moved up from the appendix.

I-024-002 Comment noted. Also, see VISION 2040 Issue Papers for background research.



VISION 2040

What do you think of VISION 2040? I-060
We want to hear from you.

Please look at affordable single family homes in the city

Also demographics of age + ethnicity.

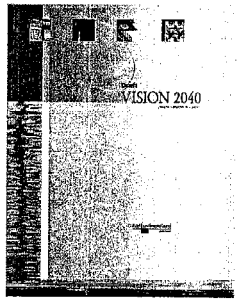
I-060-001

☒ Yes! Please add me to the VISION 2040 mailing list.

NAME Ms. Elizabeth Martin
ADDRESS 1144 10th Ave. E. Apt. 1
CITY/STATE/ZIP Seattle, WA 98102-4349
EMAIL

I-060-001 VISION 2040 has been revised to include more information regarding housing and demographics.

I-111



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NAME Elva Jensen

ORGANIZATION

ADDRESS P.O. Box 1112

CITY Silverdale STATE WA ZIP 98383

E-MAIL ejensen_2@ wavecable.com ☐ CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.

COMMENTS:

The Metropolitan Transportation Plan does not fit the needs of our county. I would like to see our county pull out of the PSRC and put with counties that are similar to our situation unlike the metropolitan areas such as Seattle.

I-111-001

PLEASE ADDRESS COMMENTS TO:

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

I-111-001 Comment noted. Note that Kitsap County has been a member of PSRC, and its predecessor agencies, since the 1950s.

Comment Letter

I-051

From: Eric Shields [EShields@ci.kirkland.wa.us]
Sent: Thursday, August 16, 2007 4:12 PM
To: Rocky Piro
Subject: Comments on Draft Vision 2040

Rocky;

As a follow up to today's Regional Staff meeting, I wanted to offer the following additional suggestions about a few of the Multicounty Planning Policies. I should preface my specific remarks by saying that overall the Vision 2040 document is excellent and will provide a solid framework for guiding future growth in the Central Puget Sound region. I commend you and the entire PSRC staff for your good work. That said, I think the wording of the following policies could be improved:

MPP-DP-7 appropriately promotes a coordinated process for establishing growth targets. However, it is written more as an action than a policy. I suggest a policy something like: "Ensure that growth targets assigned to each jurisdiction are consistent with the Regional Growth Strategy and Multicounty Planning Policies. Establish housing and employment targets for each jurisdiction and for each regional growth center." There is already an action addressing the need to create a process to assure consistent targets. It might also be good to add more discussion in the text preceding the policies about the GMA requirements for population targets and the rationale for wanting employment targets as well. I-051-001

MPP-DP-28 is not clear. It speaks of using "various tools available to address vested development to ensure that future growth meets existing permitting and development standards." I presume that the policy is referring to development that is vested under old rules that are fundamentally inconsistent with the current rules. If so, what kinds of tools do you envision that could "ensure" that vested development does not occur? I-051-002

MPP-DP-40 is a long policy with many clauses. I think that the primary intent is to improve public heath and minimize climate change. However, the opening clause seems to put the focus on cooperation and coordination between agencies. I'd suggest eliminating that clause. Cooperation and coordination are important, but they don't just apply to health and climate. I-051-003

Policy MPP-DP-44 states: "Encourage the use of innovative techniques, including…, to provide mechanisms for focusing…" Techniques and mechanisms are essentially the same thing. I think this would be clearer to just say "…innovative techniques, including…, to focus…" I-051-004

MPP-DP-54 is a general statement of support for urban design, historic preservation and arts, followed by a list of all the good things such support provides. It seems to me that list of good things would more appropriately be included in the text preceding the policies. If so, the remaining policy would be so general as to be meaningless, so could really be eliminated. I-051-005

MPP-DP-57 and MPP-DP-59 lead with the verb "Address." This is word is pretty indefinite and doesn't give a very clear idea of what is intended to be achieved. I-051-006 & I-051-007

MPP-EC-2 starts and ends with clauses that modify the central policy statement of "encouraging region-wide and statewide collaboration…" The clauses appear to be explaining the objectives of the policy, but each clause has a slightly different objective. I suggest eliminating one of the clauses and if necessary rewriting the remaining clause to properly express the objective. I-051-008

Thanks for considering these comments. Again, my compliments on a job well done.

Regards,
Eric Shields
Director
Kirkland Dept. of Planning & Community Development

Response to Comment Letter

I-051-001	VISION 2040 has been revised to address this issue.
I-051-002	VISION 2040 has been revised to address this issue.
I-051-003	VISION 2040 has been revised to address this issue.
I-051-004	VISION 2040 has been revised to address this issue.
I-051-005	Comment noted.
I-051-006 & I-051-007	VISION 2040 has been revised to address this issue.
I-051-008	VISION 2040 has been revised to address this request.

Comment Letter

I-006

Robin McClelland

From: Fletch Waller [fletchw@comcast.net]
Posted At: Tuesday, July 24, 2007 1:11 PM
Conversation: air transport
Posted To: Vision 2040
Subject: air transport

You have not enumerated the infrastructure details of realizing 2040 visions in your current issue of Regional View. That is understandable. But one infrastructure item that will be indispensable is of such magnitude and challenge that it should be identified; that is a new international airport for the Puget Sound region. By 2025, much less by 2040, we will see airport demand exceed SeaTac's capacity. Satellite airports will not suffice, as they did not in Houston or Chicago for decades. Even Newark took 25 years to mature into a significant servicer of metro NY demand.

A new airport is a planning, development, funding, and construction effort of such significance that it deserves to be called out now so as to marshal public awareness and support for its preparation. If it takes 15 years in most communities to plan, site, design and develop a new airport (and how many more years might we be at it with our love of process?) we must begin now. But who is to do the job? Not the Ports of Seattle or Tacoma given their county-limited constituencies. And not, God forbid, the State Legislature, with all the compromises and deals Eastside legislators would exact for their support. So, how, when and who are very critical questions.

A new regional airport geared for international freight and travel, for domestic demand, and for support of Washington's export economy (using "export" to mean both international and intra-USA) is essential if the population and employment visions you have laid out for 2040 are to be realized.

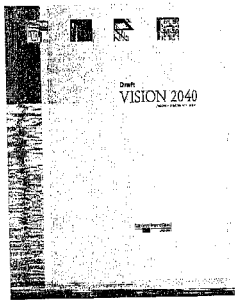
I-006-001

Response to Comment Letter

I-006-001 This issue will be considered during the update of Destination 2030.

Bremerton Open House
8/8/07

I-040



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CONTACT INFORMATION:

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NAME GEORGE WARRINGTON

ORGANIZATION SELF - TAX PAYOR

ADDRESS 1932 SW SPRUCE RD.

CITY PORT ORCHARD STATE WA ZIP 98367

E-MAIL mailgeog@msn.com ☐ CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.

COMMENTS:

PLEASE SEE ATTACHED SHEET

ADDRESSES 2 ISSUES.

1. KITSAP COUNTY 'SEED' Project

2. Layers of Bureaucratic Control.

L. Warrington

FROM:

TO:

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

Note: This page of comments does not require a response.

Puget Sound Regional Council Meeting
Kitsap Regional Library
Bremerton, Wa.
August 8, 2007

Kitsap County SEED Project:

What planning has been done to enhance Kitsap Counties proposed 'SEED' project (Port of Bremerton Sustainable Energy and Economic Development) ?

Is consideration being reviewed for prospective employee's residences, with the objective of a short commute distance ?

What about infrastructure, i.e.; sewers, communication networks, etc., to support multiple residences, in which the prospective employees will be residing ?

Layers of Bureaucratic Control:

What does this Council consider to be a reasonable number of organizations which is required to govern and control the lives of **Kitsap County** residences and property owners ?
This number is to include agencies, starting from Washington State government down to a local taxing district.

What is a reasonable cost (Tax dollars) to the members of a community, including all of Kitsap County, to fund the various layers of these Bureaucratic councils or agencies ?
Is the cost, per household to be $200 / yr, or more ?
This does not include the expenses, or financial commitments, required of these households and/or property owners, due to assessments placed upon them, as a result of the various findings.

What is the estimated current annual cost per household, in Kitsap County, to support an organization, such as PSRC ?
This would include, travel, lodging, pay for time and services, etc..

As a taxpaying citizen, in democratic society, request a written response to the 7 items (questions) addresses by this letter. Response by e-mail is acceptable.

Respectively submitted by:
Mr. G. Warrington
e-mail address: malsog@msn.com
So. Kitsap residence

PSRC 8 07

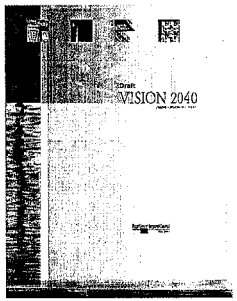
I-040-001

I-040-002

I-040-001 Kitsap SEED is a local project and, therefore, the issue is best addressed at the local jurisdiction level. VISION 2040 supports jobs-housing balance improvements.

I-040-002 Note that Kitsap County has been a member of PSRC, and its predecessor agencies, since the 1950s. Funding for the Regional Council comes from member dues and state and federal grants. See PSRC Budget and Work Program for details.

1-81



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CONTACT INFORMATION:

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NAME Gretchen Duff

ORGANIZATION

ADDRESS 6112 Wynn Jones Rd E.

CITY Port Orchard STATE WA ZIP 98366

E-MAIL [redacted] ☐ CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.

Comment Letter

COMMENTS:

I dislike the evidence that Kitsap County has lost all effective elected representation & accountability for self-governance. Even if all of Kitsap County & municipalities were to agree on changes needed in Vision 2040, it would still only consitute 3% of the PSRC vote.

This illustrates why regional government with non-elected & non-accountable people making our plans & policies is & properly should be illegal.

I oppose the whole PSRC concept & all the evidence in Vision 2040 that PSRC is operating outside of the will of the majority of Kitsap voters & its elected governments.

I-081-001

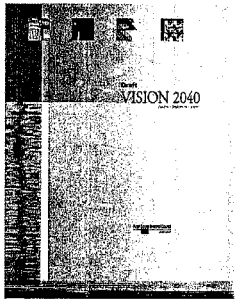
PLEASE ADDRESS COMMENTS TO:

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

Response to Comment Letter

I-081-001 Comment noted. Note that Kitsap County has been a member of PSRC, and its predecessor agencies, since the 1950s. Kitsap County and its cities account for 6% of the total vote.

1-078



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NAME Gro Marit Kleitsch

ORGANIZATION

ADDRESS P.O. Box 72

CITY Manchester STATE WA ZIP 98353

E-MAIL gromarit@aol.com ☒ CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.

While reading the draft of Vision 2040 I became increasingly aware of the overwhelming control of every facet of our lives that this proposal seeks to implement. I find it both frightening and sad that the people who wrote this document have overstepped their supposed mission and are attempting to control life, as we know it.

Page 52 refers to the GMA as advancing "orderly development" and because "Physical inactivity is a growing health problem in the United States…" these writers now have the authority to force people to be active. The Growth Management Act does not give these writers the authority to control physical inactivity in the United States. I would challenge them to provide proof of this assertion. The GMA is not provided as an open-ended guide for social engineering and the advancement of political agendas. There is no proof that compact communities foster physical activity in fact the opposite might be more correct.

America is made up of millions of people who cherish their freedom and came to the "land of opportunity" to be in control of their own destiny. That is what makes us innovators, inventors and entrepreneurs. The PSRC has no authority to take the most basic personal freedoms of physical activity and declare that they are going to control it.

I-078-001

I live in Kitsap County and I strongly believe that we do not need or want the PSRC to provide a vision for our lives here. We are far more similar to Mason County than we are to King, Snohomish or Pierce. We should not be included in the PSRC.

I-078-002

Sincerely,

Geo M. Kleitsch

Geo M. Kleitsch

I-078-001 This provision is within the authority of the Regional Council's mandates under state law (such as the Growth Management Act {see "The State of Washington's Growth Management Act and Related Laws - 2007 RCW Update"}, the Clean Air Washington Act, the Interlocal Cooperation Act), federal law (such as the Safe, Accountable, Flexible, Efficient, Transportation Equity Act -- a Legacy for Users, the Presidential Executive Order 12898 on Environmental Justice, the Clean Air Act), its Interlocal Agreement with its members, as well as the requirements related to the designations as the Regional Transportation Planning Organization, Metropolitan Planning Organization, and Economic Development District for the central Puget Sound region. Note that "orderly development" is a term in the state Growth Management Act (RCW 36.70A.210). Multicounty and countywide planning policies are required by law to address "contiguous and orderly development."

I-078-002 Comment noted. Note that Kitsap has participated in regional planning, through PSRC and its predecessor agencies, since the 1950s.

VISION 2040 I-013

What do you think of VISION 2040?
We want to hear from you.

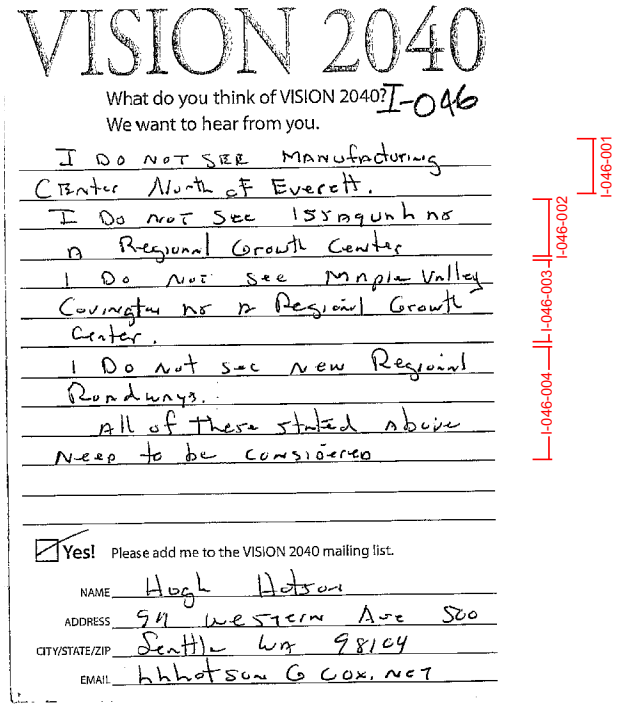
Good information - especially if kept current.

I-013-001

☒ Yes! Please add me to the VISION 2040 mailing list.

NAME Herb Simon
ADDRESS 1019 Pacific Ave. #1119
CITY/STATE/ZIP Tacoma, Wash. 98402
EMAIL simonjohnson@simonjohnsonllc.com

I-013-001 Thank you.



VISION 2040

What do you think of VISION 2040? I-046
We want to hear from you.

I DO NOT SEE MANUFACTURING CENTER North of Everett. I-046-001

I DO NOT SEE ISSAQUAH AS A Regional Growth Center I-046-002

I DO NOT SEE Maple Valley Covington AS A Regional Growth Center. I-046-003

I DO not see new Regional Roadways. All of these stated above Need to be considered I-046-004

☑ Yes! Please add me to the VISION 2040 mailing list.

NAME Hugh Hotson
ADDRESS 91 Western Ave 500
CITY/STATE/ZIP Seattle Wa 98104
EMAIL hhhotson@cox.net

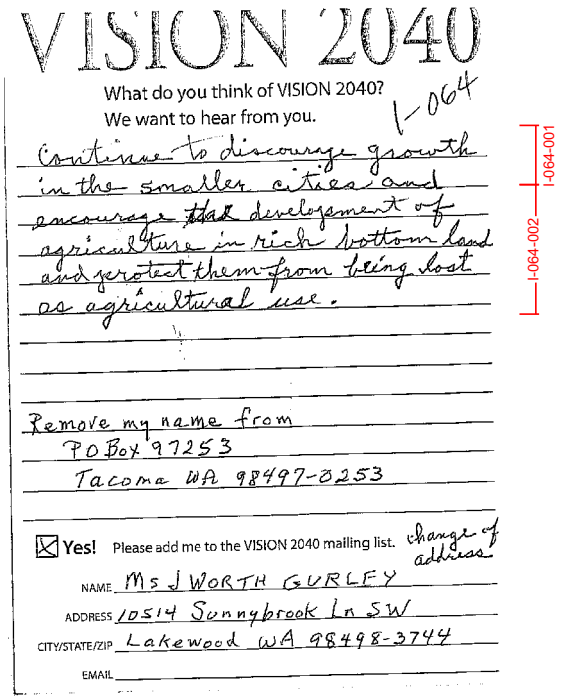
I-046-001 Comment noted.

I-046-002 Comment noted.

I-046-003 Comment noted.

I-046-004 This issue will be considered during the current update of Destination 2030.

Comment Letter



VISION 2040

What do you think of VISION 2040?
We want to hear from you.

I-064

Continue to discourage growth in the smaller cities and encourage ~~that~~ development of agriculture in rich bottom land and protect them from being lost as agricultural use.

I-064-001

I-064-002

Remove my name from
PO Box 97253
Tacoma WA 98497-0253

☒ Yes! Please add me to the VISION 2040 mailing list. change of address

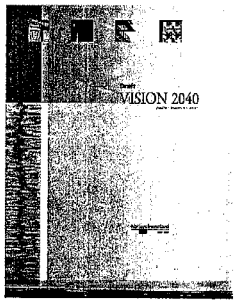
NAME Ms J WORTH GURLEY
ADDRESS 10514 Sunnybrook Ln SW
CITY/STATE/ZIP Lakewood WA 98498-3744
EMAIL

Response to Comment Letter

I-064-001 The role and health of small cities is important for implementing VISION 2040. Of the urban regional geographies, Small Cities receive the least amount of growth.

I-064-002 The VISION does this.

I-066



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CONTACT INFORMATION:

At a minimum, please provide your name, the county in which you live, and ZIP Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

NAME Jackie Rosworn

ORGANIZATION

ADDRESS 5945 Wataga Beach Dr E Kitsap

CITY Port Orchard STATE WA ZIP 98366

E-MAIL ☑ CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.

COMMENTS:

I do not want to be included in PSRC.
My county (KITSAP) is a rural county and ~~we~~ we have very little in common with the other 3 counties. I want Kitsap to opt out.

I did not "vote" for any person on the PSRC. Vision 2040 is not Kitsaps vision. (as I talk to my neighbors and friends). As I understand the GMA there is no authorization for the creation of such a governing body as PSRC and they have no authority.

Most people in my county are not aware of PSRC or Vision 2040. You are duping the public and resorting to trickery and lies. (such as Patty Lent did)
I know of no laws, policies or any other mechanism that requires you.
GET OUT OF KITSAP
Sashi Rasmussen

I-066-001

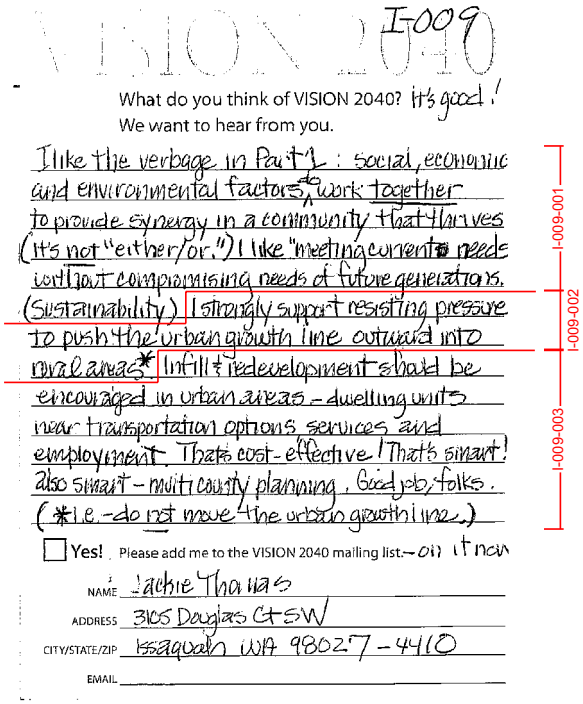
I-066-002

PLEASE ADDRESS COMMENTS TO:

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

I-066-001 Comment noted. Note that Kitsap County has been a member of PSRC, and its predecessor agencies, since the 1950s. PSRC is an association of local governments whose elected officials are voted into office at the local level.

I-066-002 Comment noted. Note that Kitsap County has been a member of PSRC, and its predecessor agencies, since the 1950s.



VISION 2040 I-009

What do you think of VISION 2040? It's good!
We want to hear from you.

I like the verbage in Part 1: social, economic and environmental factors, work together to provide synergy in a community that thrives (It's not "either/or.") I like "meeting current needs without compromising needs of future generations. (Sustainability) I strongly support resisting pressure to push the urban growth line outward into rural areas.* Infill + redevelopment should be encouraged in urban areas - dwelling units near transportation options, services and employment. That's cost-effective! That's smart! Also smart - multi county planning. Good job, folks. (*i.e. - do not move the urban growth line.)

☐ Yes! Please add me to the VISION 2040 mailing list - or if new

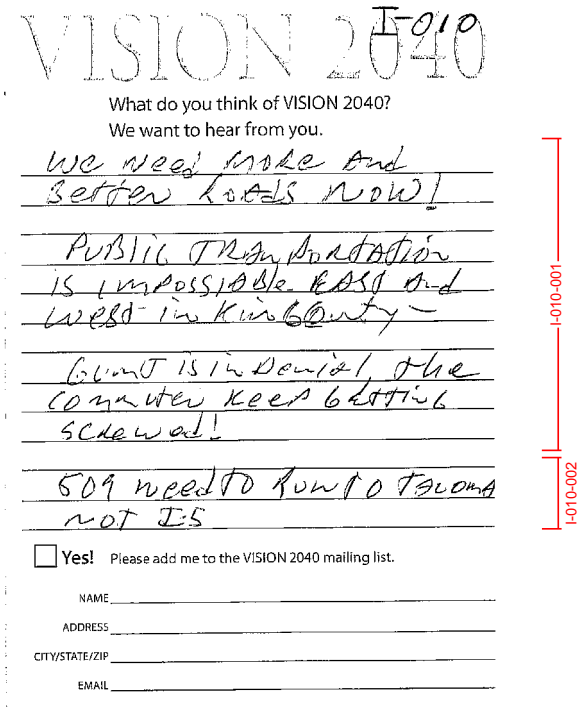
NAME Jackie Thomas
ADDRESS 3105 Douglas Ct SW
CITY/STATE/ZIP Issaquah WA 98027-4410
EMAIL

I-009-001
I-009-002
I-009-003

I-009-001 Thank you.

I-009-002 VISION 2040 assumes that the existing urban growth area will not change significantly over the planning period.

I-009-003 Concur.



VISION 2040

I-010

What do you think of VISION 2040?
We want to hear from you.

We need more And
better roads now!

PUBLIC TRANSPORTATION
IS IMPOSSIBLE. EASY and
WEED in King County —

GOVT IS in Denial, the
commuter keep getting
screwed!

509 need TO Run TO Tacoma
not I-5

I-010-001

I-010-002

☐ Yes! Please add me to the VISION 2040 mailing list.

NAME _____

ADDRESS _____

CITY/STATE/ZIP _____

EMAIL _____

I-010-001 Comment noted. The Destination 2030 update will provide an opportunity to further address regional transportation.

I-010-002 Comment noted.

Robin McClelland

From: FormProcessing@psrc.org
Posted At: Friday, September 07, 2007 1:43 PM
Conversation: Draft VISION 2040 Comment
Posted To: Vision 2040

Subject: Draft VISION 2040 Comment

I-146

Hello!
This is results of submitted form by 71.231.251.192.

Submitter Email : FormProcessing@psrc.org

Fields:
01.name = Jacquelyn Giles
02.address = 7217 44th Street West
03.city = University Place
04.state = WA
05.zip/postalcode = 98466
06.email = gilesll@comcast.net
07.comments = I am particularly disturbed by the failure of University Place and Pierce County to find a way to make sewer hookup available to those in Univ. Pl. whose homes are on septic systems. Some, like mine are in small areas kess than one mile from the Town Center project in the center of the city. We homeowners are faced with up to $35K cost to access the sewer line nearest us should our system fail. This is outrageous and unacceptable. When I moved here 2+ years ago, the realtor I worked with did not disclose, or perhaps was ignorant of the imminent passage of an ordinance that would have required anyone within 300 feet of a sewer line to connect. Because U.P and Pierce County failed to find some way to mitigate the crushing expense to individuals, a "sunset provision" took effect in January 2006.

It seems grotesque that the new "world class" golf course that was built as part of the Town Center development project is being touted as an example of progress while some of the central city has third-world sewage disposal.

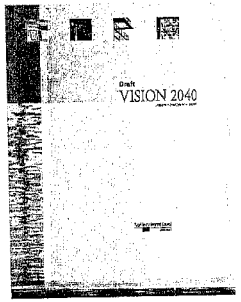
I would pay a reasonable amount to connect to the nearest sewer, but the fact that it is not a benefit only to me, but is a material benefit to the environment, an attraction to business and a basic necessary part of the infrastructure should mandate a considerable participation by the City of University Place and Pierce County.

08.mailing list = yes
09.mailtype = email
mailto = vision2040@psrc.org,dmclaughlin@psrc.org
subject = Draft VISION 2040 Comment

I-146-001

I-146-001 Comment noted.

Bremerton Open House
8/8/07
I-041



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CONTACT INFORMATION:

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NAME Joan Bradford

ORGANIZATION

ADDRESS P.O. Box 2040, Silverdale, WA. 98383

CITY Silverdale STATE WA ZIP 98383

E-MAIL ☐ CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.

COMMENTS: The 2020 people should be looking at 2040. I think it's presumptuous and arrogant for this group to be deciding how people should live in 2040. It's only an excuse for more pigs at the government trough. This is an incredible waste of money, TAXPAYER'S money!

Condo's take twice as long to sell as single family homes, because they are not desirable. People will never make mass transit profitable, or self sustaining. We take a grocery cart from the store to the car door, then drive into the garage & unload.

This county should not be linked to King, Pierce & Snohomish because we are more comparable to Mason & Jefferson Counties. Seattle has "sprawled" over into Kitsap - using the ferry - so stop restricting Kitsap's right to "sprawl" locally.

FROM: The cost to the taxpayers will be criminal to enact this!

I-041-001

I-041-002

I-041-003

I-041-004

I-041-005

Continuation of I-041-001

TO:

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

I-041-001 Comment noted.

I-041-002 Comment noted.

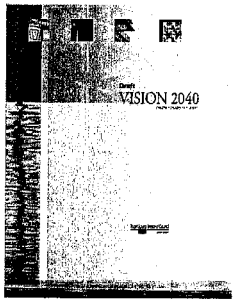
I-041-003 Comment noted.

I-041-004 Comment noted. Note that Kitsap County has been a member of PSRC, and its predecessor agencies, since the 1950s.

I-041-005 Comment noted.

I-041-001 (continued) See response to previous I-041-001.

I-067



Draft VISION 2040

And Supplemental Draft Environmental Impact Statement

Comment Form

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We want your input and need to hear from you!

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- By writing to Norman Abbott, State Environmental Policy Act (SEPA) Responsible Official, at the Puget Sound Regional Council, 1011 Western Ave, Suite 500, Seattle WA 98104-1035
- By visiting the Regional Council's Web site www.psrc.org. To submit a comment, go to the Comment section of the VISION update Web page and follow the instructions.
- By sending an email to vision2040@psrc.org.
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- By returning this comment form.

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Regional VIEW, the Regional Council's monthly newsletter, is one good way to stay informed and involved. To receive a print copy of *Regional VIEW*, visit http://www.psrc.org/publications/pubs/view/viewform.htm, or call 206-464-7090.

CONTACT INFORMATION:

At a minimum, please provide your name, the county in which you live, and ZIP Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

NAME Jean Bradford

ORGANIZATION

ADDRESS P.O. Box 2808

CITY Silverdale STATE WA ZIP 98383

E-MAIL jean.jlw@comcast.net ☐ CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.

COMMENTS:

Kitsap County has no legal reason to be in the Pierce - King - Snohomish Regional Council! Nothing here is even remotely similar to those Counties. Not our, land, our communities or our cities. These taxpayers are not going to sit still and pay millions of dollars in Tax fees to this stupid, socialistic pipe dream that you have over there. If you think Patty Lent was speaking for us, then think again! We don't need your "transportation" money because you plan 97% of it to be light rail! Not Here!! you have pages + pages of illegal, anti-Constitutional statements in your 20/30 + 20/40 vision statements. Who gives you the right to decide what rules those people have? It's not the taxpayers + you have not been elected to do this!

I-067-001

I-067-002

Jean Bradford

PLEASE ADDRESS COMMENTS TO:

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

I-067-001 Comment noted. Note that Kitsap County has been a member of PSRC, and its predecessor agencies, since the 1950s.

I-067-002 Comment noted. VISION 2040 was developed in response to federal and state legislation and PSRC interlocal agreement.

I-042

Robin McClelland

From: Jean [jeaneford@comcast.net]
Posted At: Saturday, August 11, 2007 3:43 PM
Conversation: VISION2040
Posted To: Vision 2040

Subject: re: VISION2040

To whom this may concern:

After reading Val Torrens article in the North Kitsap Herald on Saturday August 11, 2004, I am forced to say Whoa!!!!

Where are the notices of this future plan for my county? Why are the citizens not notified of this far reachng and inaccuate assessment of North Kitsap County? I-042-001

I for one want the growth to be managed and equally divided amongst ALL citiesof Kitsap County not just Poulsbo, Bainbridge and Bremerton and this thought goes for the other counties too. I-042-002

I am watching this 'historic' city of Poulsbo become a city of developers trying to make a fast buck then leave with the citizens wondering just what hit this sleepy little town.

Growth is going to happen so why not prepare the infastructure before there are 1000's of people dumped into a city. I-042-003

Case in point, the city of Poulsbo is trying to decide whether to admend a master plan to allow a Central Highland Builders to raise the density by 32% in the delvelopement of Poulsbo Place . And I must mention the height of these condo's will be 55 feet and built on a 60 degree slope.... so does this square with anyone who knows Poulsbo.

Why are there not meetings in every city in the four countires involved? Continuation of I-042-001

Why are there 1000's of acres of forest and natural lands not put aside for parks and natural preseves in every county? I-042-004

Where are the industry areas in Kitsap? I-042-005

Please send me this document.

Thank you,

Jean E. Ford
P.O. Box 622
Poulsbo, Washington 98370

1

I-042-001 The VISION 2040 update process was based on an extensive public outreach effort including three written comment periods, a number of public meetings, open houses in each of the four counties, and an ongoing outreach effort to local governments and general citizens through the use of the PSRC website, the Regional VIEW, as well as online and print display advertisements.

I-042-002 Comment noted.

I-042-003 Concur.

I-042-001 (continued) See response to previous I-042-001.

I-042-004 These lands are set aside by federal, state, and local governments to serve people and protect the environment. VISION 2040 calls for a regional greenspace strategy to coordinate these actions.

I-042-005 See comprehensive plans for Kitsap County and its cities.

I-079

August 31, 2007

Ms. Robin McClelland, AICP
Principal Planner
Puget Sound Regional Council
1011 Western Ave. Suite 500
Seattle, WA 98104-1035

Dear Ms. McClelland:

Recently I attended the PSRC meeting held locally at the Kitsap Regional library. I was disturbed at what I heard for many reasons. But the biggest one is that I don't think we "fit" in with King, Pierce and Snohomish counties. I recently read an article by James MacIsaac on regional transportation issues in the Seattle PI. He is a transportation engineer. I have enclosed that article for your review.

We have little in common with these other counties. We aren't even connected to them. It makes more sense for us to be aligned with Mason and Jefferson counties. There is no "requirement" for us to align with King, etc. counties. We get few votes because we are much smaller than they are and the voting is done according to population size. They have 450,000, we have 235,000!

As this article indicates, the other three counties are voting on regional transportation issues. Kitsap County is not included in this at all yet we are supposed to be involved in regional governance. Why aren't we being included?

Mr. MacIsaac certainly has expertise in his field and I believe you should more thoroughly investigate what he has to say. It certainly sounds to me like there is merit in what he says.

The gentleman hosting the PSRC meeting, Norm ? was not very convincing with his answers. Too frequently his answer was, "we don't have all the answers but we have to do something" so PSRC has proceeded. I don't want to throw my hard earned taxpayer money at a problem just because it shows we are doing something! And as a citizen, when I ask a question, I want real answers--not "we have to do something".

I was not impressed with the answers at this meeting. I don't think they were expecting so many of us to come and ask intelligent questions such as those asked. Norm even commented on that fact. They were not up for the task in my opinion. Or they just planned to slough off general answers, thinking few citizens would attend. But wasn't the point of the meeting for citizens to ask specific questions?

As if we don't have enough "government" involved in our county, now we added another layer with regional governance with little representation. That does not make

I-079-001

I-079-002

I-079-003

I-079-001 Comment noted. Note that Kitsap has participated in regional planning, through PSRC and its predecessor agencies, since the 1950s.

I-079-002 Comment noted.

I-079-003 Comment noted.

this citizen happy! And the enclosed article more than backs up what I am trying to say. And one of the things that really irritated me the most was the comment on page 10 about "restoring and sustaining the environment". While I don't have a problem with this to a point, I do have a problem with it when you run all over my personal property rights. Where is the committee in PSRC that watches out for this situation? ALL citizens have property rights but everyone has conveniently overlooked this! The concept is admirable but you are running roughshod over us citizens and we don't like it. If you are really concerned with the environment and you want EVERYONE's cooperation, then put a committee together for the personal property rights of citizens.

Please reconsider where Kitsap County is assigned. It does NOT belong with the biggest three counties. We will only get lost in the shuffle.

Sincerely,

Jean Bulette

Mrs. Jean M. Bulette
390 Kingsway NW
Bremerton, WA 98312

I-079-004

Continuation of I-079-003

Continuation of I-079-001

I-079-004 VISION 2040 was prepared with consideration for the Growth Management Act goals, including the protection of private property rights {RCW 36.70A.020(6)}.

I-079-003 (continued) See initial response to this comment.

I-079-001 (continued) See initial response to this comment.

I-047

Robin McClelland

From: FormProcessing@psrc.org
Posted At: Monday, August 13, 2007 5:51 PM
Conversation: Draft VISION 2040 Comment
Posted To: Vision 2040

Subject: Draft VISION 2040 Comment

Hello!
This is results of submitted form by 207.109.67.4.

Submitter Email : FormProcessing@psrc.org

Fields:
01.name = Jeff Juel
02.address = 6833 29th Ave NE
03.city = Seattle
04.state = WA
05.zip/postalcode = 98117
06.email = juelj@soundtransit.org
07.comments = I'd love to be at your Bellevue meeting, but I have other commitments. Here's my input:

We need to insist on long term sustainability in Vision 2040, particularly with regards to immigration rates. I recognize that this is a contentious Federal issue, but it is the long-term big-picture issue of our day, makes everything else more or less irrelevant, and no one seems to want to face up to how ominous this truly is.

Between the 2000 census and 2006, The state's population growth rate was 1.37%. At that rate, the state's population will double to 12 million around 2055. In a mere millenium the population of Washington state will reach 5.3 trillion or roughly 3 people per square foot. (Maybe making human pyramids will be mandatory.) That's a lot of carbon footprints!

An astounding/amazing portion of the present regional population growth is due to immigration. More people have immigrated to this state in the last ten years than in the prior three decades combined. (Funny, I thought that since Bush became president, the whole world hates the U.S. Maybe they come here to see how horrible we are first hand.) Today 1 in 4 Bellevue residents is foreign born. One out of every two new Americans is Hispanic.

It's not hard to predict that the foreign born in this country will use their growing fraction of the overall public vote to force an immigration policy that allows their beloved grandparents, cousins, friends, aunts and uncles to join them here (Family Reunification is La Raza's #2 agenda item) as well, until we have so much congestion and so many carbon footprints that the U.S. is as dysfunctional and miserable as the countries they are trying to escape from. This rant isn't about racism - it's about the shear volume of people who are flooding this country. I'd be nearly as concerned if Holland America Ocean liners were doing laps across the Atlantic bringing Dutch people across and dumping them here by the tens of thousands every day. (At least the Dutch have a culture that resembles ours and they don't have irresponsible exponential birth rates - like most of the immigrants who are pouring in.)

My sister-in-law is Chinese. I have close friends from India, Belize, and the Phillipines. I have shared my home with people from Mexico, Venezuela, Indonesia, Kazakhstan, Japan, and Taiwan. I like people from other cultures - in moderate amounts. I don't like congested roadways, skyrocketing real estate prices, more sewerage, more buildings, endless suburbia, more cars, less wilderness, power shortages, less gas and energy to go around, rationing, more crowded parks and public places, etc, etc.

We are allowing the stage to be set for something very very ugly. I dread what my children and grandchildren will have to witness. If rates of immigration are not dramatically reduced, I predict a rise in Nationalism / Fascism combined with concerns about "saving the planet" from all those darn carbon footprints. I fear that the outcome will be

(Comment continued on following page)

I-047-001

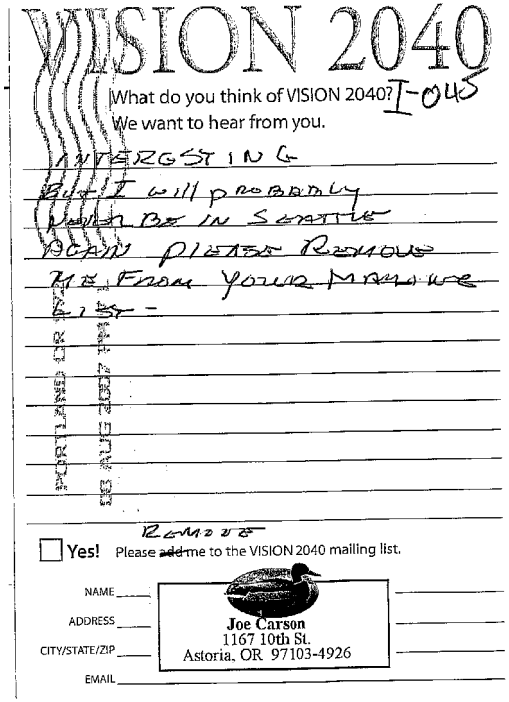
I-047-002

I-047-001 VISION 2040 is based on forecasts methods that include births, deaths, and migration. VISION 2040 addresses sustainability issues.

I-047-002 Comment noted.

absolutely dreadful. Tolerance along with "Vision" and all of the light rail lines, mass transit, growth management, and urban planning immaginable can't possibly make Washington have any reasonable quality of life if there are three people per square foot!
09.mailtype = USmail
mailto = vision2040@psrc.org,dmclaughlin@psrc.org
subject = Draft VISION 2040 Comment

Continuation of I-047-002



VISION 2040

What do you think of VISION 2040? I-045

We want to hear from you.

INTERESTING

BUT I will probably

NOT BE IN SEATTLE

AGAIN PLEASE REMOVE

ME FROM YOUR MAILING

LIST -

PORTLAND OR

23 AUG 2001 PM

REMOVE

☐ Yes! Please ~~add~~ me to the VISION 2040 mailing list.

NAME

ADDRESS

CITY/STATE/ZIP

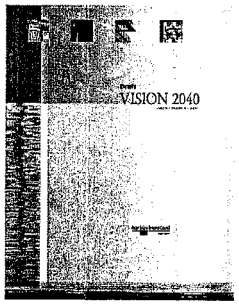
EMAIL

Joe Carson
1167 10th St.
Astoria, OR 97103-4926

I-045-001

I-045-001 Comment noted.

I-087



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CONTACT INFORMATION:

At a minimum, please provide your name, the county in which you live, and ZIP Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

NAME Joe Kleitsch

ORGANIZATION PO Box 72

ADDRESS Manchester WA- 98353

CITY _____ STATE _____ ZIP _____

E-MAIL _____ ☐ CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.

COMMENTS:

Kitsap County has had a very slow growth pattern for years, we are a small county as population goes. Kitsap has a good handle on our growth problems and don't need somebody that does not understand our community to tell us how to live and grow.

We do not need PSRC and the other new agencies in the pipeline to help us; and Tax us.

Thank you

Jan Klintsch

I-087-001

I-087-002

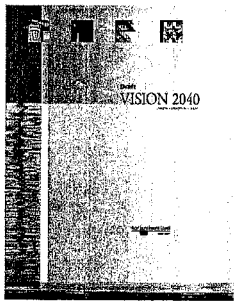
PLEASE ADDRESS COMMENTS TO:

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

I-087-001 Comment noted.

I-087-002 Comment noted.

1-091



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CONTACT INFORMATION:

At a minimum, please provide your name, the county in which you live, and ZIP Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

NAME JOHN A. HOLMBERG

ORGANIZATION PRIVATE CITIZEN

ADDRESS 606 NW HOLMBERG ST.

CITY BREMERTON STATE WA ZIP 98311

E-MAIL NA ☐ CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.

2 SEPT 07
BREMERTON, WA

COMMENTS: I WILL LEAVE THE TECHNICAL COMMENTS TO PROFESSIONALS. MY COMMENTS WILL BE PERSONAL.

OUR FAMILY ARRIVED IN KITSAP COUNTY JUNE 1907. THE MAIN CONTRIBUTION TO THE ECONOMY WAS THE BUILDING OF INFRASTRUCTURE FOR THE USE OF ALL CITIZENS. I DON'T KNOW OF ANY ENVIRONMENTAL DAMAGE DONE BY THIS ACTION TO REDUCE THE QUALITY OF LIFE. I-091-001

FOR R&R, CAMPING AND HUNTING WE OWN FOREST LAND IN NE WASHINGTON. TO TRAVEL THERE, WE HOOK UP A TRAILER, LOAD THE BRONCO SUV AND DRIVE. THIS ACTIVITY WOULD BE IMPOSSIBLE BY BICYCLE AND TRANSIT. I-091-002

I SEE NO VALUE OF PSRC TO KITSAP COUNTY. WE VOTE FOR OUR COMMISSIONERS TO GOVERN KITSAP COUNTY. I-091-003

John A. McCluskey

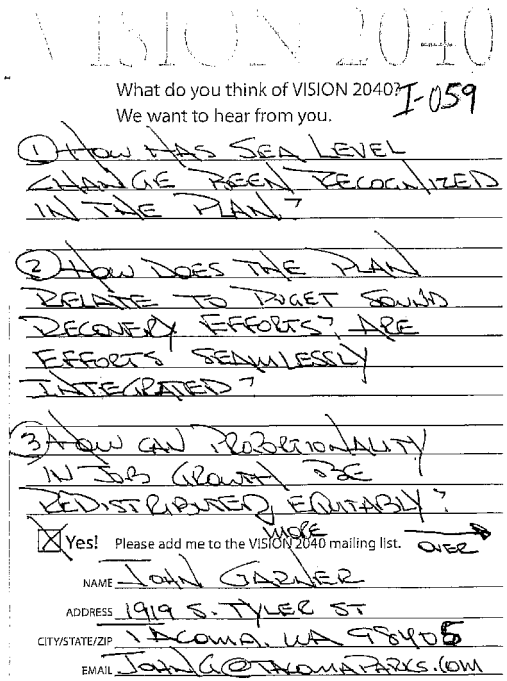
PLEASE ADDRESS COMMENTS TO:

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

I-091-001 Comment noted.

I-091-002 Comment noted.

I-091-003 Comment noted. Note that Kitsap County has been a member of PSRC, and its predecessor agencies, since the 1950s.



VISION 2040

What do you think of VISION 2040? I-059
We want to hear from you.

1) HOW HAS SEA LEVEL CHANGE BEEN RECOGNIZED IN THE PLAN?

2) HOW DOES THE PLAN RELATE TO PUGET SOUND RECOVERY EFFORTS? ARE EFFORTS SEAMLESSLY INTEGRATED?

3) HOW CAN PROPORTIONALITY IN JOB GROWTH BE REDISTRIBUTED EQUITABLY?

☒ Yes! Please add me to the VISION 2040 mailing list. MORE OVER

NAME JOHN GAZZIER
ADDRESS 1919 S. TYLER ST
CITY/STATE/ZIP TACOMA, WA 98405
EMAIL JOHNG@TACOMAPARKS.COM

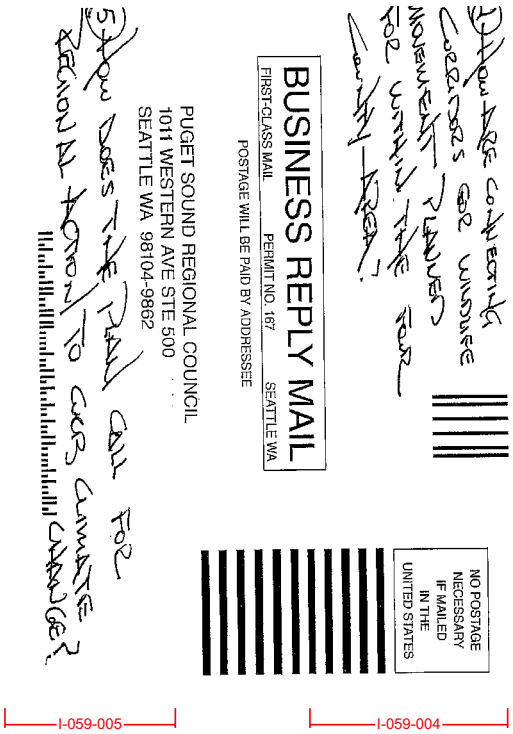
I-059-001
I-059-002
I-059-003

I-059-001 VISION 2040 has addressed this issue in its provisions related to climate change.

I-059-002 VISION 2040 has been revised to address this issue. It includes a discussion about the objectives of the Puget Sound Partnership.

I-059-003 In VISION 2040, Part II: Regional Growth Strategy addresses this issue and the Housing policy section and policies in the Economy section also address jobs-housing balance.

Comment Letter



Response to Comment Letter

I-059-004 VISION 2040 has addressed this issue. VISION 2040 includes policies and actions that would implement a regional open space plan that would include ways to connect wildlife corridors.

I-059-005 VISION 2040 addresses climate change in the narrative, policies, and implementation actions.

Comment Letter

I-133

Robin McClelland

From: john lee [john.fgci@fischergeneral.com]
Posted At: Saturday, September 08, 2007 12:24 AM
Conversation: Johnson Creek Corridor - Poulsbo, Washington
Posted To: Vision 2040
Subject: Johnson Creek Corridor - Poulsbo, Washington

To whom it may concern;

This is a comment letter to raise awareness specifically about Johnson Creek. Johnson Creek is a small type S Stream located partially within and partially without the Urban Growth Area of Poulsbo. This stream corridor has wild steelhead, coho, cutthroat and chum runs. Current densities and land use decisions will reduce this productive stream corridor into little more than a water conveyance ditch for the City of Poulsbo. The headwaters contain the largest retaining pond in Kitsap County. With 2000 homes slated to be constructed in and around this critical area known as the Johnson Creek Watershed, one wonders whether there will be anything left, or whether a will exists by those concerned with saving "excellent habitat" Jeff Davis, WDFW.

We would like you to consider saving this habitat for the future generations. We are attempting to do our part. But unless the environment starts to have a voice, it will be exploited by development and the insatiable lust for $'s.

Attached are several letters we have sent to both the City of Poulsbo and Kitsap County concerning the animals, habitat, water and critical areas the Johnson Creek Watershed contains. If the current course continues, these irreplaceable features will be lost forever on this land. Once the landscape is altered, the native flora and fauna is stripped and the hydrology rerouted to fit the convenient stormwater system an egghead has hatched, there is no going back. This is a forever decision.

The Johnson Creek Corridor is an ecosystem that should never have been allowed to be a part of an UGA. The sheer number of acres constrained by critical areas – wetlands, steep slopes, critical aquifer recharge areas, frequently flooded areas, and the amount of intact mature 2nd generation forest exhibiting old growth characteristics should qualify this area as unfit for urban densification. Developers will not be able to achieve target densities without adversely altering the functions of the critical areas the GMA is trying to protect.

Measures need to be put into place now to prevent such natural systems as the Johnson Creek Corridor from being destroyed. We have made this plea dozens of times and have been successful in holding off the tide – for now. Greedy developers target potential lands in and around Johnson Creek as easy targets to exploit. Hoping to bend and sway the current political drive of "needing to fulfill our urban density commitment" as a state driven mandate - even if this means destroying an intact ecosystem to achieve this!

I truly hope you read this letter, consider the implications of sacrificing ecosystems to achieve target densities, and realize that the land truly speaks first and if not first then it will surely be heard.

The ideas expressed on page 30 of the draft 2040 Vision are beautiful, but unless areas like

I-133-001

(Comment continues on following page)
9/10/2007

Response to Comment Letter

I-133-001 Issue best addressed at the local jurisdiction level.

the Johnson Creek Watershed are under legal protection **now**, the year 2040 will be too late to save Johnson Creek. We want to stress the urgency of saving such delicate ecosystems like ours and hundreds more around the Puget Sound. If the Johnson Creek Watershed disappears, with it will disappear another artery providing the Sound with healthy, nutrient-rich, oxygenated water. This Watershed, like so many others, is poised on a knife edge.

We beg you to place stringent, legal, protective measures now, to protect our Johnson Creek for future generations.

Sincerely,

John & Molly Lee

Advocates for Saving the Johnson Creek Watershed

Continuation of I-133-001

9/10/2007

October 17, 2006

TO: Mayor Quade & Poulsbo City Council

FROM: Johnson Creek Association
P.O. Box 1632
Poulsbo, WA 98370

To whom it may concern,

For the record, my name is Molly Lee. I live at 20897 NE Melson Lane, Poulsbo, WA 98370. I am a member of the Johnson Creek Association.

In regards to accusations on my integrity, I stand before Christ and my fellow man in my endeavor for the protection of the Johnson Creek Watershed. As for the integrity of Johnson Creek being questioned, I am only sorry that I am not a biologist, engineer or of the like. Then I could extoll the virtues of the Johnson Creek Corridor far exceeding anything I have said so far.
In regards to the value of the buffer dimishing, beyond 50 feet – that is just incorrect. I suppose it is merely subjective based on an individuals personal gain. We have submitted data that proves a maximum rate of return in relation to an expanding buffer. The more natural functions we are willing to value with our critical areas the bigger the buffer. This means

Sincerely,

Molly Chamberlin-Lee

Johnson Creek Association

1

Note: This page of comments does not require a response.

September 26, 2006

TO:

FROM: Johnson Creek Association
P.O. Box 1632
Poulsbo, WA 98370

To whom it may concern,

In the National Geographic Vol. 195, no.2 issue, Paul Rainey, a geneticist in Oxford, is studying bacteria as they relate to biodiversity – that is relationships involving species from insects to nematode worms to birds to mammals & myriad's of other species groups. His comment regarding uninhibited growth opportunity: "That was what astonished me, how quickly these many forms appear. But that diversity can also be lost in an instant: Shaking the test tube destroys its mix of habitats and the varied forms of bacteria." It's the variety of environments – the surface of the broth, the vial's edge and bottom – that maintains the diversity." notes Rainey, "And that's true for the biodiversity of the natural world as well".
The Johnson Creek corridor has threatened species habitat, it has structural diversity of habitats, it has spatial diversity and interspersion of habitats, it has undeveloped open space habitat, and it has adjacent habitats and also linear contiguity of habitats.

We don't have to think we need to travel far away to find such an amazing piece of biodiversity. Poulsbo's back yard, the Johnson Creek Corridor, has all the ingredients to make it a place of great world interest. We now have an opportunity to wrap our arms around it protectively, for what it will provide in the future – one of the last fairly intact, pristine environmental communities – an amazing gift for generations to come.

I'm sure that the native tribes in the Amazon were unaware at first at what they had and what they were losing. But now ecotourism and scientific study are their norm. This is where we are – poised to deteriorate a natural wonder that we may not understand the significance of.

Johnson Creek Association revels in the prospect of protecting and restoring the corridor with grants, interested political and scientific communities, and exposure to various documentaries, and reaches out it's hand to resolve growth dilemmas in order to bring Johnson Creek Corridor the star status it deserves.

The Corridor has been given the right by the GMA to fulfill its' net biological worth – that is to have healthy wild fish, wildlife, plant life, potable water and so many other hydrologic, biologic and geologic processes. This is what we offer our citizens. The proposed CAO need to adapt to this.

1

Note: This page of comments does not require a response.

Not long from now, if we give our blessing on such a significant corridor, our community will be impassioned and thankful at its presence and they too will protect it like a precious gift. As Virginia Morrell says of a trip to Equador:

> "High overhead a wind blows through the locust trees, rustling their pale green leaves & rippling the fronds of the macaw palms. Somewhere in the distance a bird fill the air with its trilling call. I walk deeper into this little patch of woods and wonder at the wealth of life around me, from Wilsons ants to the soaring palms. Like the insect rich rainforest canopy and the Martian red desert of Australia, this fragmented forest is yet another uncharted shore of life. But even in its small space I feel the pull of the unknown, the call of mysteries to be unveiled."

Sincerely,

Molly Chamberlin-Lee

Johnson Creek Association

Note: This page of comments does not require a response.

September 25, 2006

TO: Mayor Quade & Poulsbo City Council

FROM: Johnson Creek Association
P.O. Box 1632
Poulsbo, WA 98370

To whom it may concern,

In regards to the memorandum allowing & proposing Low Impact Development (LID) practices in stream and wetland buffers, it is arrogant and unacceptable for us to take a well intended and high quality technique such as LID to encroach into our already ineffectual proposed buffers.

These are quotes from *Low Impact Development Technical Guidance Manual for Puget Sound* from the Puget Sound Action Team and Washington State University.

> "LID emphasizes evaporation, storage, & infiltration of storm water in smaller-scale facilities distributed throughout the site and on sites with mixed soil types. The LID site plan should locate impervious areas over less permeable soils and preserve and utilize permeable soils for infiltration."
>
> "Using hydrology as a design element begins by identifying and maintaining on-site hydrological processes, patterns and physical features (streams, wetlands, native soils and vegetation, etc) that influence those patterns."
>
> "The conservation and use of onsite native soil and vegetation for storm water management is a central principle for an LID design."

This is quoted from the Center for Trade & Economic Development:

> Core assessment and management objectives for a project that is in a drainage basin with a wetland designated as high quality and sensitive should include:
> 1> Protect native riparian vegetation and soils.
> 2> Protect diverse native wetland habitat characteristics to support the native assemblage of wetland biota and maintain or approximate pre-development hydrology and hydroperiod within the wetland.

If you want to question the quality of the Johnson Creek Watershed then you should ask why the City has ordained the 30 acre, privately owned watershed on the middle fork of Johnson Creek to be included into the UGA.

1

Note: This page of comments does not require a response.

Again, quoting from the *Low Impact Development Technical Guidance Manual for Puget Sound:*

> The objective for riparian area assessment and management is to protect, maintain and restore mature native vegetation cover that provides
>
> 1> Dissipation of stream energy and erosion associated with high flow events.
> 2> Filter sediment, capture bedload and aid in flood plain development.
> 3> Improve flood water retention and groundwater recharge.
> 4> Develop diverse ponding and channel characteristics that provide habitat necessary for fish and other aquatic life to spawn, feed and find refuge from flood events.
> 5> Provide vegetation, litter and nutrients tot he aquatic foodweb.
> 6> Provide habitat for a high diversity of terrestrial and aquatic biota.
> 7> Provide shade and temperature regulation.
> 8> Provide adequate soil structure, vegetation and surface roughness to slow and infiltrate stormwater delivered as precipitation of low velocity sheet flow from adjacent areas.

"Unrestricted overland flow distance should not exceed 150 ft. for pervious areas and 75 feet for impervious areas before reaching buffers."

My property rights question is, "Who's going to pay me restitution for the damage done to, being done to, and proposed to be done to my portion of Johnson Creek, or as a Kitsap County citizen, damage to the whole watershed?

Johnson Creek has potentially all that it takes to be one of the cleanest, most pristine, salmon-bearing streams around. I am proposing a 300 foot creek wildlife corridor in perpetuity, to save one of our most valuable assets.

Steelhead are now on the threatened species list.

You have a copy of a LID design from the above-stated book. In fact, the entire *Low Impact Development Technical Guidance Manual for Puget Sound* is contained in the CD you received titled *CAO on CD by Futurewise.*

Sincerely,

Molly Chamberlin-Lee

Johnson Creek Association

Note: This page of comments does not require a response.

October 18, 2006

TO: Mayor Quade & Poulsbo City Council

FROM: Johnson Creek Association
P.O. Box 1632
Poulsbo, WA 98370

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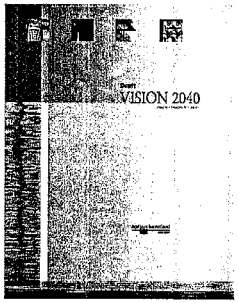
Sincerely,

Molly Chamberlin-Lee

Johnson Creek Association

Note: This page of comments does not require a response.

I-068



Draft VISION 2040

And Supplemental Draft Environmental Impact Statement

Comment Form

What do you think about the draft regional growth strategy and multicounty policies in VISION 2040?

We want your input and need to hear from you!

The public comment period lasts from Monday, July 16 through Friday, September 7, 2007.

The public is encouraged to provide thoughts, ideas, and concerns on the Draft VISION 2040. Comments can be made in one of the following ways:

- By writing to Norman Abbott, State Environmental Policy Act (SEPA) Responsible Official, at the Puget Sound Regional Council, 1011 Western Ave, Suite 500, Seattle WA 98104-1035
- By visiting the Regional Council's Web site www.psrc.org. To submit a comment, go to the Comment section of the VISION update Web page and follow the instructions.
- By sending an email to vision2040@psrc.org.
- By attending any of the Regional Council's board, committee, or other meetings and submitting a comment. A public comment period is offered at the beginning of each meeting.
- By returning this comment form.

The comments that you make will become part of the public record for this project. Your thoughts will help decision makers as they finalize VISION 2040 in fall 2007. Responses to your comments will be provided in the Final Environmental Impact Statement.

Regional VIEW, the Regional Council's monthly newsletter, is one good way to stay informed and involved. To receive a print copy of *Regional VIEW*, visit http://www.psrc.org/publications/pubs/view/viewform.htm, or call 206-464-7090. I DO RECEIVE THIS EXCELLANT NEWSLETTER AND AS CHAIRMAN OF KITSAP COUNTY PLANNING COMMISSION HAVE BEEN TRYING GET 10-12 COPIES SENT TO US, SO FAR NO LUCK.

CONTACT INFORMATION:

At a minimum, please provide your name, the county in which you live, and ZIP Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

NAME JOHN M. TAYLOR

ORGANIZATION KITSAP COUNTY PLANNING COMMISSION, CHAIR

ADDRESS 9428 TRACYTON BLVD. N.W.

CITY BREMERTON STATE WA ZIP 98311

E-MAIL _____ ☐ CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.

01 SEP. 07

COMMENTS: DEAR MR. ABBOTT:
CONCERNS:
NOTHING IN OUR CONSTITUTION OR GMA DELEGATES LEGISLATIVE AUTHORITY FROM A COUNTY TO A "REGIONAL" BODY NOR DO THOSE LAWS PROVIDE A MECHANISM FOR ELECTED COUNTY OFFICIALS TO MAKE SUCH DELEGATIONS!
WITH KITSAP GETTING APPROX 3% REPRESENTATION AND KING GETTING 52% WE DO NOT HAVE A PRAYER. I BELIEVE IT BEST FOR KITSAP TO WITHDRAW FROM PSRC AND ALIGN WITH A MORE LIKE-COUNTY SUCH AS MASON.
I BELIEVE IN LOCAL CONTROL!

I-068-001

URBAN GROW: I UNDERSTAND THE NEEDED CONCEPT OF PUTTING GROWTH INSIDE URBAN GROWTH BOUNDARY LINE. HOWEVER GOV. IS REQUIRED BY GMA TO PROVIDE THE INFRASTRUCTURE. THIS IS NOT HAPPING. I HAVE ENCLOSED A TRUE STORY OF A CLIENT WHOM I REPRESENT. THE EXAMPLE IS ONE OF MANY IN OUR COUNTY. PLEASE ENTER THE ENCLOSED "STORY OF TWO SISTERS" INTO THE OFFICIAL RECORD.
I CAN BE REACHED AT 1-800-298-3715 ANYTIME.
THANK YOU FOR YOUR WORK.

I-068-002

John M. Taylor
Resident of Kitsap County from birth 1940.

PLEASE ADDRESS COMMENTS TO:

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

I-068-001 Comment noted. Note that Kitsap County has been a member of PSRC, and its predecessor agencies, since the 1950s. Kitsap County and its cities account for 6% of the total vote.

I-068-002 VISION 2040 calls for focusing growth and infrastructure investments. Specific implementation is a local issue.

MAKERS
architecture + urban design

make (māk) vb **1** to bring into being by shaping or altering **2** to form in the mind, a judgment or plan **3** to put together by combining parts **4** to build, construct, formulate, devise, create **5** to prepare for use; arrange **6** to cause to happen

I-063-

Mr. Norman Abbott
PSRC
1011 Western Avenue
Suite 500,
Seattle WA, 98101

August 29, 2007

Re: Draft VISION 2040 comments

Dear PSRC Policy Board Members, Staff Committee Members and Staff:

The staff, working committees, and Policy Board members are to be commended on the VISION 2040 July 2007 Draft. It is a substantive and thoughtful piece of work and a good start towards a strategy that will take our region to the next phase of its evolution. Particularly commendable is the new emphasis on the environment and the detailed demographic analysis that leads to the regional strategy for managing growth. Acknowledging the strengths of the draft document, I would like the following suggestions to be considered.

I-063-001

General

Audience

VISION 2040 needs to communicate a compelling vision to the general public. The overall success will depend on people being able to grasp a few key concepts/objectives and then supporting actions over time to achieve those goals. For example, the 1992 edition of VISION 2020 had a strong image of a cluster of centers (red circles) connected by several kinds of transportation links (multicolored lines) set in a blue and green map. I believe that this one image, along with sketches of what the future centers would be like, painted a picture of the plan's central direction and contributed immensely to the plan's success.

This edition of the region's growth strategy should have some equally compelling ideas. The **environment** is clearly a resonant theme, and leading with it in the document is excellent, but it seems that if we could also present a clear vision for how we will **get around**, how planning decisions can lead to **healthier citizens**, and how we will provide **affordable housing** for the region's citizens, I think that we will be responding to what is on people's minds.

I-063-002

1425 Fourth Avenue, Suite 901
Seattle, Washington 98101

phone/ 206.652.5080
fax/ 206.652.5079
makers@makersarch.com

(Comment continues on following page)

I-063-001 Thank you.

I-063-002 VISION 2040 has been revised to address this issue and now includes G-Action-1 that calls for a program to convey the provisions to PSRC members and an education effort to reach out to the general public.

The *Regional View* insert is fine for summarizing the strategy's contents, but I would challenge you to develop a similar four-page tabloid that paints a compelling vision for the three or four large issues facing our regional community and how the strategy addresses those challenges. Similarly, what would be the message n a three minute presentation of the key new or sustained directions that the strategy advocates?

I-063-002 Continuation

I-063-003

Greater Emphasis on How We Will Grow, Not Just Where We Will Grow

The current draft describes where new development will take place. Figure 2-1 of the Supplemental Draft Environmental Impact Statement is particularly revealing. But, it says little about the character of that development or how the development will be inserted into the region's already developed areas. "What will our communities be like?" "How will our lives change?" These are the things that people care about, more than the demographic charts and tables.

The fifth paragraph of the July 16 cover letter states:

> *"At the heart of the project were the questions, "How do we want our region to look and function in the year 2040? How can we build on our successes, address barriers that have challenged us, and maintain a common vision for growing so that in 2040 this region is still envied for its beauty, innovation and quality of life?"*

The VISION 2040 document does not yet address these questions head on.

One suggestion to address this deficiency would be to use graphics showing what different types of centers and other forms of development might be like. Another, more innovative approach might be to take several different kinds of communities where growth is expected and show similar examples from the region that have experienced similar growth. For example:

- Community X is projected to grow from about three dwelling units per acre to ten dwelling units per acre. The development potential in the area comes from the number of undeveloped lots (picture).
- Community Y experienced a similar growth pattern between 1996 and 2006 ("before" and "after" pictures), and the City X's planning policies and regulations are in place to direct such growth through design guidelines.
- *Message: Projected development in Community X is reasonable and will lead to improved conditions, as in the case of Community Y).*

And, of course, you can use some plans that have already been published, such as for SeaTac's 154th St Station area and Tacoma's inner neighborhoods near the UW campus. This is also where some of the work from the regional design strategy may be most useful.

I-063-004

I-063-003 VISION 2040 contains the following new features: a numeric growth distribution strategy, an environmental section and set of environmental policies, and new policies that address growth management issues, actions and measures.

I-063-004 VISION 2040 has been revised to address this issue. See the expanded narrative in Part II: Regional Growth Strategy and also refer to the response to I-063-003.

Another approach would be to prepare a conceptual map on the order of the RDS strategy map and show very generally where different community building strategies might occur. These strategies might be something like:

- Dramatically intensify residential development in metropolitan centers (picture of high-rise development in North Downtown, Seattle).
- Infill inner city neighborhoods (picture of new residential construction south of UW campus/convention center).
- Increase mixed-use development in "core" cities (picture of Kirkland or Renton center).
- Develop auto-oriented areas between cities (Tukwila/SeaTac, etc.).
- Develop smaller nodes on transportation corridors.
- Create whole communities.
- Develop efficient, well-connected employment centers (Redmond/Overlake).

A third method might be a cartoon-like aerial showing these types of development without being place-specific. The drawing might look something like the three environment drawings in the current draft. If it would be helpful, I would be happy to discuss these ideas with you.

Describe How Change Will Occur Over Time

Long-term plans are hard to grasp. It would be very useful to present how communities can change gradually over time. Some sort of "movie" showing how changes can be made over time would be very helpful and keep people from automatically perceiving that cataclysmic changes will happen abruptly. The old UCIDS report PSRC prepared in the mid-1990s is an example of this, and maybe there is a more updated way to communicate change over time.

Explain What Is Really Important for Changing the Status Quo

To the general reader, it is hard to identify what is new or different about this update. This is particularly true when one looks at the transportation projections and the growth projections for unincorporated UGA's. It would be reassuring to know what trends will change, where we will actually see a change in development patterns, and what will make a noticeable difference in the foreseeable future.

Regional planning is like piloting a supertanker: it takes a long time to change the ship's direction. My guess is that our growth management "ship" is generally going the right direction, but there do seem to be some hazards out there; namely, lack of affordable housing, gridlocked transportation, and pressure on rural areas. So, it seems like we should be changing course with regard to these, and perhaps other

(Comment continues on following page)

I-063-005
I-063-006
I-063-007
I-063-008

I-063-005 The final VISION 2040 document will contain pictures and other material to explain the strategy and multicounty policies. Also, VISION 2040 contains an action calling for a second document to be produced after adoption. This document will be designed to tell the story in a simple, graphic way.

I-063-006 VISION 2040 has been revised to address this issue.

I-063-007 Comment noted. See response to I-063-005.

I-063-008 Much of this type of information is contained in the appendices to VISION 2040 and in the SDEIS.

factors, and it would be good to discuss how these changes might happen, even if PSRC is not a leader on that particular issue.

Suggestion for the Environmental Introduction

The emphasis on the environment an excellent direction, but our August 1 work group was a bit confused by the difference in the environmental framework section and the policy/strategy section starting on page 27. I suggest that the environmental framework section be used to establish why a consideration of the environment is central to PSRC's mission; the justification for the Council's taking a more active role in regional environmental management, and the types of activities that PSRC might undertake in conjunction with local governments, applicable agencies, and non-governmental organizations. The current draft intimates this, but a strong punch line would make the whole section clearer. The last paragraph might close with reiterating the following points (in a narrative way):

1. Our ecosystem is regional in scale, transcending political boundaries.
2. A healthy ecology is essential to the region's growth management objectives.
3. No single group is really addressing regional environmental management comprehensively and holistically, especially in the way that it relates to growth management activities.
4. Therefore, PSRC must take an active leadership role in regional environmental management efforts to achieve its core mission. Possible tasks/roles include:
   - Organize and manage a regional environmental information base.
   - Establish—or, at least, coordinate—a region-wide benchmark and monitoring program
   - Integrate environmental science information and environmental management activities into land use and development planning.
   - Foster and support innovative measures to improve the environment; especially those that can benefit from activities at the regional scale.
   - Others as appropriate.

John Lombard's book, *Saving Puget Sound: A Conservation Strategy for the 21st Century*, 2006, American Fisheries Society, could provide important substantiation for much of the material in the environmental discussions. Lombard's book not only outlines a science based approach to specific ecological issues; it discusses the role of various governmental entities in environmental management and argues for governmental structures necessary to implement a comprehensive strategy. For example, on page 8, Lombard notes:

> *One consequence of fragmented authority is that no existing governmental institution approaches ecological issues holistically. Actions by any one government agency*

(Comment continues on following page)

Continuation of I-063-008

I-063-009

I-063-010

I-063-009 VISION 2040 has been revised to address this issue. For example, see En-Action-1.

I-063-010 Comment noted.

> *generally address only parts of what is needed, and not necessarily the most important parts..... We do not necessarily need to create a regional level of government, smaller than the state but larger than local governments. But we must find new ways of working together, providing sufficient authority over the right issues at the right scales...*

He discusses this point in much greater detail in Chapter 4, which includes a section on PSRC. The VISION 2040 Issues Paper on the environment came up with similar findings, although without anywhere near the same level of analysis or documentation.

A Note on the Approach

It might be useful to note that we are entering from a period where competition defined development practices and shaped the regional landscape to one in which competition is leavened with cooperation and coordination between governments, private interests, communities, interest groups, and institutions. (See *Regional Design Strategy*: Principles.) This general shift from oppositional to collaborative efforts is central to PSRC's approach and role in the growth management activities described in VISION 2040.

Policies and Specific Issues

Describe More Concretely the Link Between Policies and Actions

It is not clear how the policies will lead to achieving the vision. The document does explain well how the MPP's relate to county-wide and local policies and how the various elements are interrelated, but the link between policies and on-the-ground effect is still tenuous.

Our group at the August 1 Forum generally favored including the actions with the policies. This seems like a good way to strengthen the policies and to indicate how they might be pursued directly. Also, it might be useful to describe how, in the past, MPP's have directed or modified public actions and led to on-the-ground results. The brief overview of the actions at the end of each element is a good summary, but it lacks the weight and specificity that the actions merit.

Acknowledge Property Rights

It appears that we could diminish some of the misunderstanding regarding regional planning objectives if VISION 2040 included a statement acknowledging property rights. I-933 showed that there is still a lot of mistrust, and it would not hurt to state that property rights (both public and private) are a cornerstone of our system of governance. Acknowledging this in the state WAC's for shoreline management

(Comment continues on following page)

Continuation of I-063-010

I-063-011

I-063-012

I-063-013

I-063-014

I-063-011 VISION 2040 has addressed the important role of local governments in implementation.

I-063-012 VISION 2040 has been revised to address this issue by bringing the actions from the appendix into the document. See Part IV: Implementation. VISION 2040 also relies on local governments and other participants to implement the policies and actions.

I-063-013 VISION 2040 has been revised to address this issue. The actions are now included in the respective policy sections.

I-063-014 VISION 2040 has been revised to address this issue. VISION 2040 has added a statement that addresses the GMA goal regarding property rights.

helped (somewhat) to reduce resistance to that regulatory effort. Below is the kind of policy that might help:

> ***Policy**: Acknowledge constitutionally based property rights, foster greater communication between public and private interests, and support growth management solutions that achieve private as well as public objectives*

When our group discussed land use issues at the August 1 Forum, a couple of property rights activists said that they wanted a strong commitment to property rights in the document. I suggested that there be a policy something like the one above, and that settled the issue within the group. Afterwards, one of the property rights folks came to me and thanked me for at least understanding their concerns and said that this was the first time that someone outside their group even acknowledged the concern at a PSRC function.

Continuation of I-063-014

Development in Unincorporated Lands inside the UGA

As Mark Hinshaw noted in his luncheon talk, the relatively large amount of growth projected for unincorporated lands inside the UGA's is disconcerting and suggests that more attention should be given to how that development occurs. VISION 2040 should include policies and actions to ensure that the growth is structured into walkable, mixed-use communities that provide the transportation access and services needed for livable neighborhoods. As noted in policies MPP-DP22, 23 and 24, it may be advisable to encourage local municipalities to incorporate nearby unincorporated lands as soon as possible to provide the planning and infrastructure necessary to shape viable communities and provide services. But the policies miss the point of structuring lands for greater efficiency and livability. Please consider adding language such as in the suggested policy below in the Unincorporated Urban Growth Areas section:

I-063-015

> ***Policy:** In order to structure growth into viable communities with adequate services and ensure orderly and efficient land development patterns, provide incentives to encourage cities to annex unincorporated areas within urban growth areas, provide infrastructure and guide development.*

PSRC should also evaluate comprehensive plans with respect these objectives to ensure that land is developed properly before annexation. Therefore consider a policy something like:

I-063-016

> ***Policy**: In the review of city and county comprehensive plans, evaluate whether or not adequate means are included to ensure orderly and efficient land use patterns and service provision in unincorporated lands within urban growth areas.*

I-063-015 VISION 2040 supports annexation and joint planning. See the Development Patterns section for additional narrative in the subsection titled "Unincorporated Urban Growth Areas."

I-063-016 Issue best addressed at the local jurisdiction level.

The policy above, or a similar one incorporating its objective, should be supported with an action to conduct a study to identify effective methods of structuring growth in these areas. The study should identify useful tools such as urban design measures, providing transit in outlying areas and incentives for environmentally responsive development.

I-063-017

Centers

The actions calling for an evaluation of regional growth centers and developing a common framework for subregional and secondary centers is good. Please add the following work items in these actions:

I-063-018

- As part of the evaluation of regional growth centers, study the relationships between proximate centers to identify coordination actions that might achieve benefits in terms of land use efficiency, provision of local services, more efficient transportation between centers, common open space planning, unique redevelopment opportunities, and other planning concerns.

I-063-019

- As part of the Subregional and Secondary Centers framework, explore models and measures to redevelop land along transportation systems, create smaller nodes of development that provide many of the mixed use and walkability characteristics of designated centers, special challenges of developing centers in unincorporated areas inside the UGA, and design measures to facilitate these kinds of centers.

Transportation

I-063-020

The chart in Figure 2-8 of the Supplemental Draft Environmental Impact Statement appears to indicate that the VISION for the future is for the auto to continue to dominate our transportation system. Indeed, it seems that there are only minor changes in current trends and that VISION 2040 is a continuation of the status quo. At the August 1 Forum, staff explained that this is because land use alone will not change the transportation mode split. The real change will happen when different networks are tested in the model during the Destination 2030 update. **However, VISION 2040 should establish the objectives and set the criteria for mode split and other transportation parameters so that the modeling and transportation solutions are directed by clear and balanced growth management principles.** For example, VISION 2040 should set goals (L.O.S. or otherwise) for walkability, bicycle access, and transit ridership as well as mode split and overall vehicle trips. Furthermore, there are probably other innovative transportation-related criteria that should be addressed.

I-063-021

The time to set these objectives is now, because transportation should be considered an integral part of our growth management strategies rather than as an isolated package. The figure at the top of page 24 illustrates that VISION 2040 is the over-riding policy direction for the functional plans. If this is the case, then it should set

(Comment continues on following page)

I-063-017 VISION 2040 supports joint city/county planning for unincorporated urban growth areas.

I-063-018 The actions include these provisions. The specifics will be included in a scope of work for this action that will be done after adoption of VISION 2040.

I-063-019 VISION 2040 has addressed this issue. The narrative and table describing centers is now clearer, the goal for other centers is more specific, and the policies regarding regional growth centers, manufacturing/industrial centers, and other centers have been clarified with regard to funding prioritization. Furthermore, in DP-Action-5, a statement has been added: "Address the role of smaller nodes that provide similar characteristics as centers."

I-063-020 The EIS shows that VISION 2040 is a positive change. The Destination 2030 update will bring additional positive change.

I-063-021 VISION 2040 has been revised to address the issue. See the new Development Patterns action and the expanded transportation narrative, as well as the new transportation policy (MPP-T-24) that addresses alternative modes to driving alone. The current Destination 2030 update will provide an additional opportunity to address this issue.

goals and functional targets and benchmarks for the parameters being considered in the functional plans. Therefore specific quantitative targets for transportation characteristics should be set in VISION 2040.

Also, please consider the following additional Transportation policies:

- *Give priority to those transportation projects that address local community development objectives and that provide an appropriate community development component as part of the transportation improvements.*
- *Work toward new methods, including funding sources, governance structures, and measures to facilitate regional decision making, to fund and build regional infrastructure.*
- *Search for more effective ways for communities and local governments to participate in the planning and design of transportation and other large-scale infrastructure projects. Such means might include, for example, assisting local input committees with technical support so that their input can be more effective or initiating redevelopment planning in conjunction with the transportation improvements.*

Resource Lands

The current MPP-DP-5 seems to give primacy to uses next to resource lands. Such a policy—if you really want one to protect residences against gravel mining expansion, for example—should be put in the incompatible use section. I suggest that MPP-DP-5 read:

> ***Policy**: Ensure that development on rural and resource lands does not adversely impact resource lands or lawful resource-based economic activities.*

Additionally, the regional design strategy emphasized using a full kit of tools to reduce development encroachment on rural lands and offered some suggestions for addressing this most critical issue. The action for developing a regional strategy for TDR's and PDR's is an excellent idea. Please consider adding other rural and resource land protection strategies to that. It may be that the region would support a substantial PDR bond issue if a compelling case could be made for it. The Regional Design Team threw out the idea of a "ROSID" (regional open space investment district) that might bear some consideration.

Continuation of I-063-021

I-063-022

I-063-023

I-063-024

I-063-025

I-063-026

I-063-022 VISION 2040 addresses this issue in existing policies. An additional policy is not needed.

I-063-023 VISION 2040 has been revised to address this issue. See the fiscal opportunities in the General policy section.

I-063-024 VISION 2040 addresses this issue with stronger implementation actions related to coordination among government agencies and others with responsibility for providing infrastructure. Also, see response to I-063-023.

I-063-025 VISION 2040 has been revised to address this issue in what is now MPP-DP-32. The policy you reference (previously MPP-DP-5) has been deleted.

I-063-026 Comment noted.

Housing

The housing actions are the real meat of this section. Affordable housing policies are too often ignored, and most of the policies seem to lack any clear method of implementation without the actions. Also, please consider the following changes to MPP-DP-36:

> ***Policy**: Recognize and give priority to transportation facilities, infrastructure, and services that explicitly advance the development of housing in centers **and areas that are following exemplary practices for achieving affordable housing**.*

The notion is that centers are not always (or even most often) where affordable housing is being produced. For example, the Seattle Housing Authority projects of New Holly, Othello, and Rainier Vista are outside centers and will be served by LINK. It seems that the overarching policy to focus investment in centers should be relaxed for specific purposes, and supporting affordable housing is certainly one.

PSRC's Role in Improving Growth Management Practices

The following are some observations regarding PSRC's potential role in advancing growth management planning practices. They do not relate to the Draft VISION 2040 content, but do relate to how VISION 2040 is implemented. They are submitted here because now is an opportune time to consider how we can more effectively shape growth over the next 15 years. The key question in that regard is: *How can we (meaning those concerned with the region's future) improve practices and direct fundamental trends as necessary to meet public objectives?* And an associated question most relevant to VISION 2040 implementation is: *How can PSRC most effectively contribute to changing undesirable trends (such as the continued dominance of the automobile in transportation funding and the increased scarcity of affordable housing and its resulting impacts on the regional economy) and difficulties in planning practices (such as the lack of coordination between development planning and environmental restoration or the inability to redevelop transportation corridors).* The Regional Design Strategy suggests several ways that PSRC can play an active role in specific issues, but there is a more fundamental question: *Given the current structure of local, regional and state governance, how can PSRC effect the changes in regional governance practices needed to better achieve its mission*? Work on the RDS has prompted several discussions and personal thoughts on this matter that I would like to relate.

It appears clear that fundamental structural change in the ways that planning is conducted in Washington State is directed by state legislative actions (sometimes as interpreted by the courts) and funding priorities. The major context in which we

(Comment continues on following page)

I-063-027
I-063-028
I-063-029
I-063-030
I-063-031

I-063-027 VISION 2040 has been revised to strengthen the housing section.

I-063-028 VISION 2040 has been revised to address this issue. The housing policies in VISION 2040 are now a separate section in Part III: Multicounty Planning Policies and the discussion of housing issues has been expanded.

I-063-029 Regional agreement on a vision for our long-range future is one way PSRC contributes to changing undesirable trends and lack of coordination.

I-063-030 Regional agreement on a vision for our long-range future is one way PSRC contributes to changing undesirable trends and lack of coordination. See the implementation actions throughout the policy sections.

I-063-031 PSRC provides the "regional table" where officials and others gather to discuss issues. PSRC does not have the resources to provide broad facilitation services.

conduct planning is framed by actions such as the SEPA, SMA and GMA and the ways that transportation is funded.

However, the identification of emerging issues, new ideas and changes in public attitudes occurs at the "grass roots level so that most progressive directions to address emerging challenges and opportunities "bubble up" from below. The problem is that this "bubbling up" of new ideas and directions takes a long time and there are a lot of missed opportunities in the interim. For example, Pierce, King and Snohomish Counties are all struggling with programs to retain a viable agricultural economy and protect resource lands when a more comprehensive approach would be clearly beneficial. And, it took years of work and advocacy before the GMA was enacted.

PSRC, through the implementation of VISION 2040 could greatly facilitate this bubbling up process by working more actively with local governments and NGO's to facilitate state governmental action on areas of mutual interest such as housing affordability, comprehensive environmental management, and transportation funding priorities. The idea is that through facilitating communication, collective advocacy, providing technical information, conducting case studies and other activities, PSRC could serve as a facilitator in better integrated state and local governance. The Prosperity Partnership is an example of how PSRC is already fulfilling this role in the economic arena. Why not similarly pursue it in the growth management arena as well?

In terms of state policy implementation, Washington State typically relies on a "bottom up" approach where local governments pursue individual approaches to state directives. From the beginning, PSRC, through VISION 2020 and associated activities has assumed a critical organizational role in providing a planning framework and other support for local governments. PSRC's demonstrated success in applying regional strategies to fill the gap between state and local implementation measures should be acknowledged, leveraged, and expanded where appropriate to more actively address issues that need regional scale action.

No doubt, you all constantly wrestle with these questions. The point of this discussion is to encourage all participants working on VISION 2040 to more assertively consider PSRC as a facilitator between state and local governments and non-government organizations in pursuing the structural changes needed to address emerging growth management issues. The four actions described in the draft VISION 2040 implementation section are fine, but articulating a more pro-active vision for the organization's role in affecting appropriate changes in the regional planning context would fulfill an important need.

To summarize, my work on the Regional Design Strategy and the Environmental Management Issues Paper lead me to believe that there is a lot of necessary implementing work that can be greatly facilitated through efforts at the regional scale.

(Comment continues on following page)

Continuation of I-063-031

I-063-032

I-063-032 Comment noted.

I urge you to be more aggressive in undertaking those efforts. Of course, the additional work will take additional resources. But I believe that through carefully articulating the issues, setting priorities and defining work efforts with respect to state and local activities, a compelling case for additional resources can be made.

Continuation of I-063-032

Conclusion

Thank you for your consideration. Please know that I ardently support your efforts and believe strongly in the value of your work. If you have any questions, please do not hesitate to contact me.

Sincerely,

John Owen
Partner

V2040 comments ltr.doc

I-057

Robin McClelland

From: FormProcessing@psrc.org
Posted At: Monday, August 20, 2007 5:39 PM
Conversation: Draft VISION 2040 Comment
Posted To: Vision 2040

Subject: Draft VISION 2040 Comment

Hello!
This is results of submitted form by 68.178.109.232.

Submitter Email : FormProcessing@psrc.org

Fields:
01.name = Joshua Putnam
02.address = 320 3rd Ave SW
03.city = Pacific
04.state = WA
05.zip/postalcode = 98047
06.email = josh@phred.org
07.comments = I've been looking through the Vision 2040 draft, and referring back to Vision 2030 and existing Regional Bicycle and Pedestrian documents on the PSRC web site, and there's one issue that I have not seen mentioned, an issue that is both a safety issue and an easily removable barrier to bicycle transportation:

Many traffic intersections are controlled by signals that do not detect the presence of bicycles. Inductive-loop signal controls can be tuned to detect bicycles, in the majority of cases no new hardware is required, only adjustment of the controls.

When I addressed this issue with King County earlier this year, their response was that making signals detect bicycles was not practical, and that cyclists could use pedestrian pushbuttons. I encouraged King County to take a longer look at this issue, since a cyclist stranded in a left-turn lane has to walk across other traffic lanes to reach a pedestrian button, which is neither safe nor convenient. I also pointed

out that Seattle, Bellevue, and other King County cities not only adjust

their signals to detect bicycles, but also mark the detector loops so that cyclists know where to stop to trigger them.

I was pleasantly surprised when King County Road Services reversed their

policy and agreed that signals should be adjusted to detect bicycles, and said they would begin doing so immediately, and that they would mark

detector loops.

Pierce County, on the other hand, says their standards don't call for detecting anything smaller than a 100cc motorcycle, and they have no plans to change this standard.

I don't know what other PSRC jurisdictions are doing on this issue.

This is a genuine safety issue for transportational cyclists, and creates a barrier to bicycle transportation on streets controlled with these signals.

Is this an issue that can be addressed by PSRC's Bike/Ped program?

FYI, MUTCD does already have standards for marking detector loops for bicycle use, so this does not require reinventing the wheel, just adopting better standards.
08.mailing list = yes
09.mailtype = email
mailto = vision2040@psrc.org,dmclaughlin@psrc.org
subject = Draft VISION 2040 Comment

1

I-057-001

I-057-001 Issue best addressed at the local jurisdiction level.

I-152

September 7, 2007

Norman Abbott
Puget Sound Regional Council
1011 Western Ave., Suite 500
Seattle, WA 98104-1035

Re: Draft Vision 2040 Comment

Dear Norm and Staff,

You have the official comments from the League of Women Voters, which I fully endorse. I would like to add some unofficial comments from the viewpoint of a citizen who is dismayed by the changes related to growth, including terrible traffic, loss of green spaces, air & water pollution, declines in fish & wildlife populations and ugly, ill-planned commercial & residential neighborhoods. There are, of course, upsides such as more employment opportunities, some enhanced cultural & recreational activities, and the beginning of efforts to create better-designed communities. I-152-001

Vision 2040 does a commendable job of promoting changes to current patterns which will reduce the negative effects of growth. I particularly applaud the increased attention to protecting and restoring the health of the natural environment, which is so vital to our quality of life, and the push to direct future growth to existing urban areas. I-152-002

Regarding selected Multicounty Planning Policies:

LAND USE
Policies MPP-DP-26 thru 28 and their related actions are particularly important to prevent the conversion of resource lands. I-152-003

HOUSING
MPP-DP-31 thru 37 address one of our biggest challenges: to create an adequate, equitable & rational distribution of housing for lower-income people. To MPP-DP-36, I would add "give priority to infrastructure serving centers which include affordable housing." Many more tools are needed to implement housing policies. I-152-004 I-152-005

TRANSPORTATION
It is essential to employ every possible strategy to reduce the use of the single-occupant-vehicle. Achieving this will advance many of the other goals in Vision 2040. Additional miles of roadway is not a long-term solution to the region's transportation problems. I-152-006

Sincerely,

Julie Langabeer
200 Priest Point Dr. NW
Tulalip, WA 98271

I-152-001 Comment noted.

I-152-002 Thank you.

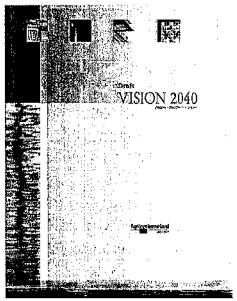
I-152-003 Concur.

I-152-004 VISION 2040 has been revised to address this issue. See Housing section policies and actions.

I-152-005 Comment noted.

I-152-006 VISION 2040 has been revised to address this issue, with stronger policies and narrative related to reducing vehicle miles traveled (VMT). For example, see new policy MPP-T-24 and DP-Action-18.

1-083



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And Supplemental Draft Environmental Impact Statement

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- By writing to Norman Abbott, State Environmental Policy Act (SEPA) Responsible Official, at the Puget Sound Regional Council, 1011 Western Ave, Suite 500, Seattle WA 98104-1035
- By visiting the Regional Council's Web site www.psrc.org. To submit a comment, go to the Comment section of the VISION update Web page and follow the instructions.
- By sending an email to vision2040@psrc.org.
- By attending any of the Regional Council's board, committee, or other meetings and submitting a comment. A public comment period is offered at the beginning of each meeting.
- By returning this comment form.

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CONTACT INFORMATION:

At a minimum, please provide your name, the county in which you live, and ZIP Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

NAME KARL DUFF

ORGANIZATION Kitsap Alliance of Property Owners

ADDRESS 6112 Wynn Jones Rd. E.

CITY Port Orchard, Kitsap County STATE WA ZIP 98366

E-MAIL (kduff@ix.netcom.com) ☒ CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.

DRAFT COMMENTS REGARDING PSRC VISION 2040

I oppose the

COMMENTS: The sections of vision 2040 that violate the terms of the interlocal agreement to which Kitsap County agreed when it joined. These include the following:

(1) The only federal mandate to which Kitsap County is actually committed to support is the Regional Transportation Plan (RTP), since this is under federal mandate. But VISION 2040 devotes itself primarily to regional growth management, which is not under federal mandate. I-083-001

(2) the Interlocal Agreement says in at least four places that growth management policy is to be "based on and consistent with local and comprehensive plans". However, VISION 2040 makes it clear that PSRC "prepares the regional growth management strategy" and must certify that "all elements of the countywide comprehensive policy"are consistent with PSRC policy and vision. I-083-002

(3) VISION 2040 abounds with conditions not contained at all within Kitsap County local plans (involving, for example, such things as establishing permanent rural lands, allowing no roadbuilding in rural areas, moving all schools to urban growth areas and establishing wildlife corridors in both rural and urban growth areas, etc.) Therefore, it is clear that PSRC VISION 2040 is in violation of the Interlocal Agreement. I-083-003

(4) The Interlocal Agreement cannot be modified without unanimous consent of all parties of the four counties (King, Pierce, Snohomish and Kitsap). Kitsap County together with all of its municipal entities only constitutes 3% of the PSRC vote. It is obvious that Kitsap County has no effectual means of voter approval for PSRC's faulty VISION 2040. It therefore seems clear that either the VISION 2040 document needs to be significantly revised or Kitsap County should give its required Section XII "six month notice" for withdrawal from the Interlocal Agreement. I-083-004

It is noted that there are no appeal provisions within PSRC for Kitsap County's public electoral bodies. Therefore the comments I am submitting on this sheet appear to be the only type of means short of litigation to correct (a) violation of Kitsap County's Interlocal Agreement contract, (b) illegal removal of Kitsap's public electoral representation and (c) clearly PLANNED usurpation of private property rights. This initself is proof of removal of Kitsap County's loss of constitutional electoral representation. Lacking correction of these VISION 2040 and Interlocal Agreement issues, Kitsap County will have no choice but to withdtraw from the Interlocal Agreement to escape PSRC's unlawful usurpation of Kitsap's public policy and legislation. I-083-005

Karl Dwyer

PLEASE ADDRESS COMMENTS TO:

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

I-083-001 Comment noted. The provisions in VISION 2040 are within the authority of the Regional Council's mandates under state law (such as the Growth Management Act {see "The State of Washington's Growth Management Act and Related Laws - 2007 RCW Update"}, the Clean Air Washington Act, the Interlocal Cooperation Act), federal law (such as the Safe, Accountable, Flexible, Efficient, Transportation Equity Act -- a Legacy for Users, the Presidential Executive Order 12898 on Environmental Justice, the Clean Air Act), its Interlocal Agreement with its members, as well as the requirements related to the designations as the Regional Transportation Planning Organization, Metropolitan Planning Organization, and Economic Development District for the central Puget Sound region.

I-083-002 VISION 2040 is based on local comprehensive plans.

I-083-003 Do not concur.

I-083-004 Comment noted. Note that Kitsap County has been a member of PSRC, and its predecessor agencies, since the 1950s, and opted in under the state Growth Management Act to the 1995 VISION 2020. Kitsap County, along with its cities, constitutes over 6 percent of the total vote.

I-083-005 Comment noted. The provisions in VISION 2040 are within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to comment I-083-001).

I-003

VISION 2040

What do you think of VISION 2040?
We want to hear from you.

Commuting and executing as two different things. The region has been very slow to execute. There is a lack of leadership. I think a good first step would be to have a transportation "Czar" for the region so we could avoid the tri-county issues of the past. I am fully supportive of the vision and hope it becomes a reality for our child. More urban density w/ a solid transportation plan is the answer.

☒ Yes! Please add me to the VISION 2040 mailing list.

NAME Kristine Anderson
ADDRESS 4610 NE 38th St.
CITY/STATE/ZIP Sea WA 98105
EMAIL krydenus@comcast.net

I-003-001 I-003-002 I-003-003 I-003-004

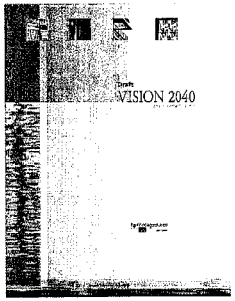
I-003-001 Comment noted.

I-003-002 Comment noted.

I-003-003 Thank you.

I-003-004 Concur that these are important components.

I-020



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CONTACT INFORMATION:

At a minimum, please provide your name, the county in which you live, and ZIP Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

NAME Kirk Robbins

ORGANIZATION Queen Anne Community Council

ADDRESS 2540 - 6th Ave W

CITY Seattle STATE WA ZIP 98119-2511

E-MAIL _____ ☐ CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.

Comment Letter

COMMENTS:

the 2040 population forecast — is either not a forecast or is a non-time-specific plan, or is a forecast by the only group who can actually forecast out 30 years. Clarify explicitly what it is, directly on/under the graph, page 4

Protect industrial land just as you protect resource lands — they are a resource for the socio-economic populace/workforce

MPP-DP 38 — the "improved environment for walking" means, take the car suburbs and allow infill. Small groceries, smaller lot sizes. Permissive incentives, no cost. Take the pressure off already — healthy neighborhoods, like ours!

I-020-001

I-020-002

I-020-003

PLEASE ADDRESS COMMENTS TO:

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

Response to Comment Letter

I-020-001 The total amount of growth planned for in VISION 2040 is derived from a forecast. The distribution of that growth to regional geographies is based on a desired growth pattern. The graph now has an accompanying detailed narrative with it.

I-020-002 Comment noted.

I-020-003 VISION 2040 has addressed this issue.

Comment Letter

COMMENTS:

"Rigorous Testing" - Lonergan, in the video -
"bend growth trends" - Idem.
"Expanded provisions for walkability"
(development patterns)

I-020-004
I-020-005
Continuation of I-020-003

PLEASE ADDRESS COMMENTS TO:

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

Response to Comment Letter

I-020-004 A set of "reasonable tests" compared the numbers in the Regional Growth Strategy to small area forecasts, percent share by county, average annual growth rate, and population target trends. See technical report titled "Regional Growth Strategy Background."

I-020-005 The meaning is to work together to take corrective actions, as necessary, to ensure VISION 2040 is implemented.

I-020-003 (continued) See initial response to this comment.

I-004

VISION 2040

What do you think of VISION 2040?
We want to hear from you.

Dear 2040 Representative
I am somewhat surprised that WA State
Dept. of Natural Resources is not a
membership State Agency. WDNR manages
aquatic lands throughout the state and
economic growth is heavily dependent on the
use and/or easements through these submerged
habitats.

I-004-001

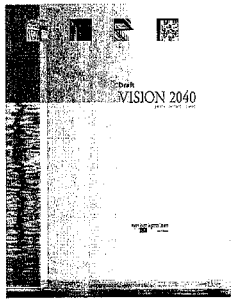
Larry Dominguez
Salmon - Aquatic Ecologist
WDNR stewardship Science
Larry.dominguez@dnr.wa.gov

☐ Yes! Please add me to the VISION 2040 mailing list.

NAME
ADDRESS
CITY/STATE/ZIP
EMAIL

I-004-001 Comment noted. Note that the Department of Natural Resources has participated in the VISION 2040 update process through the Issue Paper on Environmental Planning.

I-027



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CONTACT INFORMATION:

At a minimum, please provide your name, the county in which you live, and ZIP Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

NAME LEE FELLINGE, DEPUTY MAYOR

ORGANIZATION CITY OF SAMMAMISH

ADDRESS 801 228TH AVE SE

CITY SAMMAMISH, WA 98075 STATE _____ ZIP _____

E-MAIL LFELLINGE@CI.SAMMAMISH.WA.US ☐ CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.

Comment Letter

COMMENTS:

FIRST, I STRONGLY SUPPORT THE INTEGRATED PLANNING THAT PRODUCED VISION 2040

I-027-001

SECOND, I THINK THERE IS A DISCONNECT, FOR SOME LARGER CITIES LIKE SAMMAMISH, BETWEEN THE REQUIREMENT TO TAKE GROWTH AND PRACTICAL MEASURES TO PROVIDE MULTIMODAL TRANSPORTATION. IDEALY TRANSPORTATION METHODS SHOULD PRECEDE DEVELOPMENT. SAMMAMISH HAS HAD SOME OF THE HIGHEST GROWTH IN KING COUNTY AND HAS BEEN IN A CATCH UP MODE FOR TRANSPORTATION INFRASTRUCTURE SINCE INCORPORATION. IF WE ARE TO BE ASKED TO CONTINUE TO ABSORB HIGH LEVELS OF GROWTH, WE NEED PRACTICAL MEANS TO PROVIDE TRANSPORTATION, ESPECIALLY TRANSIT AND NON-MOTORIZED ALTERNATIVES.

I-027-002

PLEASE ADDRESS COMMENTS TO:

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

Response to Comment Letter

I-027-001 Thank you.

I-027-002 See revised fiscal policies and discussion in VISION 2040. Also, the issue of transit and non-motorized investments will be considered when Destination 2030 is updated.

I-80

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

TO WHOM IT MAY CONCERN:

Remove Kitsap County from PSRC effective immediately. It does not qualify for inclusion by either population or contiguous urban areas. It is not adequately represented in PSRC by representatives elected by its own citizens.

The goals and policies encompassed in Vision 2040 have not been adequately defined or discussed by Kitsap's citizens; therefore the public process has been violated and has not been adequate to determine the suitability of Vision 2040's effects on Kitsap's unique situation.

PSRC and Vision 2040 have no legal authority to include Kitsap County and doing so violates the constitutional and legislative right to local control.

Giving PSRC regional authority for the distribution of state and federal transportation grants creates a blackmail system unfair to Kitsap County since it is inadequately represented within PSRC.

The social engineering aspects of Vision 2040 are destructive to our belief in freedom and government of the people, by the people and for the people; it effectively removes the responsibilities of elected officials to electoral constituents and further oversteps its authority by addressing issues it has determined are too difficult to resolve at the individual jurisdiction level.

Do not continue to include Kitsap County in PSRC.

Lillian N. Ross, Kitsap County resident
905 NE Paulson Rd
Poulsbo, WA 98370
(360) 692-6369

I-080-001

I-080-001 Comment noted. Note that Kitsap County has been a member of PSRC, and its predecessor agencies, since the 1950s.

I-156

Linda Berry-Maraist
17960 Fjord Dr. NE
Poulsbo, WA 98370
ldmaraist@yahoo.com
9/7/07

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
Vision2040@psrc.org

Dear Mr. Abbott,
I attended the Poulsbo City Council meeting on Sept. 5 when a presentation was made about the Vision 2040 proposal. It is very unfortunate that we have such an inadequate time to comment on a very substantial document, as I understand the comment period closes today. I have not had time to adequately study this proposal, but want to comment on two major concerns that I have discovered:

Existing UGA's and the issue of expansion of UGAs

MPP-DP-8 Accommodate the region's allocation of growth first and foremost in the urban growth area. Ensure that development in rural areas is consistent with the regional vision.

"The regional growth strategy was developed with the understanding that with good planning and efficient land use, existing urban growth area designations can accommodate the population and employment growth expected by 2040. Any adjustments in the urban growth areas in the coming decades should continue to be minor". (page 37)

I believe the statement on page 37 is in direct conflict with DP-8. My question is, how much of the growth that will happen in the next 33 years will be required to happen within the existing UGA and how much will UGAs will be allowed to expand to accommodate that growth, and who gets to decide?

The issues affecting a small city with a relatively small UGA are very different from a small city with a large UGA or a large metropolitan area such as Seattle. I am extremely concerned that the rigidity of the existing UGAs be clarified. I am very supportive of building within the UGAs, encouraging infill and increasing density somewhat……but how much density is appropriate in a small city, is a major question. That decision needs to be made thoughtfully with lots of community input—not with a broad-brush freeze of where ever the line is drawn today. If the statement on page 37 were to be held to literally, the historic character of our community could be wiped out if we were to try to accommodate the next 33 years of growth within Poulsbo's existing UGA.

I-156-001

I-156-001 VISION 2040 assumes no substantive expansion of the urban growth area.. However, it is recognized that countywide planning organizations consider urban growth area expansion decisions based on the requests of individual cities as required by the state Growth Management Act.

Comment Letter

Rural lands and the issue of fully contained communities

MPP-DP-26 Avoid fully contained communities outside of the designated urban growth area because of their potential to create sprawl and undermine state and regional growth management goals.

MPP-DP-29 Maintain the long-term viability of permanent rural land by avoiding the construction of new highways and major roads in rural areas.

Kitsap County has rural wooded incentive program that allows clustered housing in rural areas. I believe that allowing clustered housing in rural areas in combination with permanent open space and trail networks, may provide some very positive solutions for the north Kitsap County. What will the impact of DP-26 be on Kitsap County's Rural Wooded incentive program? I-156-002

I am concerned that this document appears to be written with large urban areas in mind and will negatively affect small cities surrounded by rural areas. If a small city like Poulsbo is to continue to grow, how will we connect to other areas if not through rural areas? The goal of keeping people within a city is far more realistic in a large metropolitan area than in a very small town in a mostly rural county. I-156-003

I would appreciate being added to the project mailing list.

Sincerely,

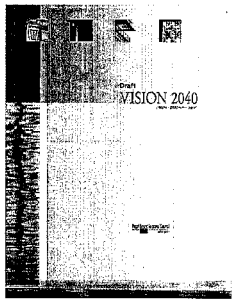
Linda Berry-Maraist

Response to Comment Letter

I-156-002 VISION 2040 does not speak to rural clustering.

I-156-003 VISION 2040 includes all types of communities and the Regional Growth Strategy does include growth to Small Cities.

I-023



Draft VISION 2040

And Supplemental Draft Environmental Impact Statement

Comment Form

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We want your input and need to hear from you!

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- By visiting the Regional Council's Web site www.psrc.org. To submit a comment, go to the Comment section of the VISION update Web page and follow the instructions.
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CONTACT INFORMATION:

At a minimum, please provide your name, the county in which you live, and ZIP Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

NAME Lucy Steers

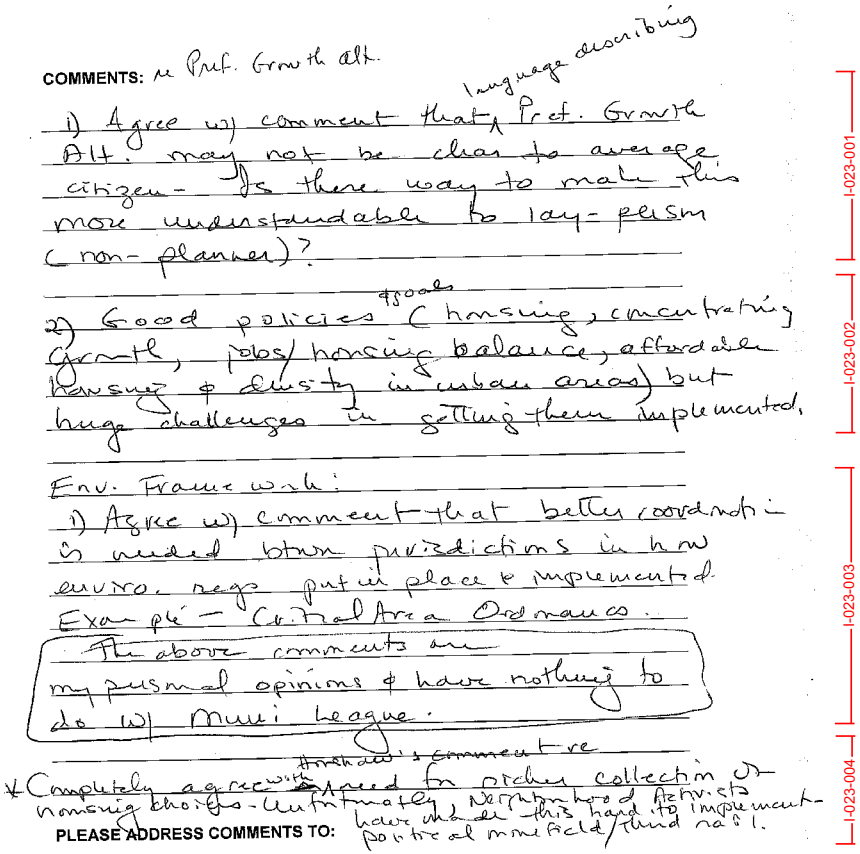
ORGANIZATION Muni League

ADDRESS 2817 Cascadia Ave S

CITY Seattle STATE WA ZIP 98144

E-MAIL LBSteers@comcast.net ☐ CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.



COMMENTS: re Pref. Growth alt.

1) Agree w/ comment that Pref. Growth Alt. language describing may not be clear to average citizen - Is there way to make this more understandable to lay-person (non-planner)?

2) Good policies (housing, concentrating goods Growth, jobs/housing balance, affordable housing & equity in urban areas) but huge challenges in getting them implemented.

Env. Framework:

1) Agree w/ comment that better coordination is needed btwn jurisdictions in how enviro. regs put in place & implemented. Example - Critical Area Ordinances.

The above comments are my personal opinions & have nothing to do w/ Municipal League.

*Completely agree with Anderson's comment re need for archive collection of housing choices - Unfortunately Neighborhood Activists have shaded this hard to implement - political minefield/third rail.

PLEASE ADDRESS COMMENTS TO:

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

I-023-001
I-023-002
I-023-003
I-023-004

I-023-001 VISION 2040 has been revised to address readability. The charts, maps, tables, illustrations, and other graphics have been reworked for accuracy and readability. VISION 2040 includes an action that calls for a program to convey the provisions to PSRC members and an education effort to reach out to the general public.

I-023-002 Thank you.

I-023-003 Concur. VISION 2040 addresses the issue, calling for coordination between jurisdictions and agencies.

I-023-004 Comment noted.

Comment Letter

I-008

VISION 2040

What do you think of VISION 2040?
We want to hear from you.

We must focus on Puget Sound period. We will never be able to clean it up if we wait. This effort must lead and drive all other planning. Use it to create incentives for other folks to join the effort.

I-008-001

☒ Yes! Please add me to the VISION 2040 mailing list.

NAME Mamaker

ADDRESS 16710 Agate Pass

CITY/STATE/ZIP Bainbridge WA 98110

EMAIL Lynda.Lynn@mamaker.com

Response to Comment Letter

I-008-001 VISION 2040 has been revised to address this issue. VISION 2040 includes a discussion on the objectives of the Puget Sound Partnership and how they relate to the regional vision.

I-050
Open House
Bellevue – August 15, 2007

August 15, 2007

To: PSRC

The following preliminary comments are provided on the "Draft Vision 2040".

OVERALL: Not a good or exciting book. It seems like a report how things turn out. Does not "lead" only follows and reports info. Leaves one wondering what is really going on.
VISION: Not specific enough. Too many general words. It is dull and so what.

I-050-001

SPECIFIC PURPOSE: Why this Vision? State the purpose clearly, upfront and seem important. Maybe a table or circle chart where requirements come from, ie: Growth Mgmt Act, each city part, Sound Transit part etc.

I-050-002

AUTHORITY: Nothing and leaves one wondering who's on first base! How does vision get accomplished and who makes it happen? Who is in the lead and relationships?
GOALS: Be specific.

I-050-003

SCOPE of PSRC: I still do not understand why Olympia area is not included. It is important for such things as overall area transportation corridors and longer range improvements. State why that area is not included.

Continuation of I-050-002

GENERAL: The draft looks like an overall "do-good" document. It is so general and so many words that it appears to mean nothing. I know I will be looked at like an out of touch old person when I provide the above comments. What is the way to be most effective with these kind of comments? I would appreciate your opinion.

Continuation of I-050-001

Thanks.
Sincerely Lynn Lee Thompson 425 746 9128
LynandLeet@comcast.net

I-050-001 Comment noted. In the final VISION 2040, the implementation actions have been relocated from the appendix to the respective policy sections.

I-050-002 PSRC mandates come from state and federal law and the interlocal agreement with members. See the legal framework that is now in Appendix 1 in the final document. This four-county region is defined for planning purposes under both federal and state law. Thurston and Island counties are associate members of PSRC.

I-050-003 Comment noted.

I-050-002 (continued) See response to previous I-050-002.

I-050-001 (continued) See response to previous I-050-001.

I-134

September 7, 2007

Maggie Fimia
Deputy Mayor, Shoreline
Co-Chair CETA, Coalition for Effective Transportation Alternatives
729 North 148th
Shoreline WA 98133
206 368-0814
mfimia@zipcon.com

RE: COMMENT AND QUESTIONS ON PSRC'S DRAFT VISION 2040

Thank you for the opportunity to submit the following comments and questions for the record regarding the Draft Vision 2040 Plan. The comments and questions specifically refer to DRAFT Vision 2040 documents listed at the end of this letter.

I am submitting these comments as an individual, not in any official capacity. I am also submitting these comments as a 14-year policy maker in the Region who strongly supports the Growth Management Act, transit, non-motorized modes, HOV/Carpools and as an early endorser of transportation pricing. I chaired the first Transportation Pricing Task Force at PSRC and served on the Transportation Policy Board for eight years.

The performance measures from Chapter II, figure 2-8 and Appendix 3C tell a story of deteriorating transportation performance that contradicts the positive narrative of the Plan. If I am reading the "Plan" correctly, we will spend $140 billion over the next 30 years on transportation infrastructure, including 125 miles of light rail and still see vehicle miles go up 47% on our Freeways and 56% on our Arterials. Hours of delay on freeways increases 143% and on Arterials by 282%. Transit trips increase from about 2% of all trips to only 3%. Work trips from 8% to 11% region-wide, with Snohomish, Pierce and Kitsap and areas outside of Seattle at much lower rates.

Those may be good numbers over a "do nothing" scenario, but they are unsustainable for our region and our cities. Included in these comments and questions is a challenge to PSRC and regional leaders to provide alternatives and real vision for how to reduce congestion, increase transit and non-motorized mode share, really attract growth to our urban centers and connect the whole region in a timely and affordable way with real alternatives to having to own one car for every person in the household.

COMMENTS: The Key transportation performance measures, like vehicle miles traveled, hours of delay, transit ridership, etc. should be front and center, easily readable in the Summary document.

I-134-001

(Comment continues on following page)

I-134-001 The VISION 2040 Final EIS has addressed this issue, with all of the key indicators shown in the Executive Summary in the Summary of Impacts Table. Note that these issues will be refined when Destination 2030 is updated.

In addition, the most important data for the Public and for elected officials and analysts, the performance measures contained in Appendix 3, Section 3C, are too small and too buried to be seen.

Continuation of I-134-001

In order for elected officials, government staff, and citizens to better assess this Plan please provide the following information:

REGIONAL OUTCOMES

From Chapter II Page II.29 Figure 2-8 Transportation Performance of Alternatives, Regional:

1. Confirm that these outcomes, even the "Preferred Growth Alternative," assume implementation and funding of the $140 Billion Destination 2030 – the Metropolitan Transportation Plan (MTP).

I-134-002

1a. How many miles of highway lanes, light rail, commuter rail does the MTP assume?

According to the measurable goals for the Preferred growth alternative the following outcomes increase significantly over the 2000 base year:

I-134-003

Vehicle Miles Traveled Overall- 52%
VMT – Freeways- 47%
VMT- Arterials – 56%

Total Hours of Delay – 195%
Freeways – 143%
Arterials – 282%

2. Please offer the PSRC transportation planning staff's professional commentary on how cities like Shoreline and others in the Region are supposed to deal with this increase in trips on our arterials and freeways when there is already significant congestion and cut-through traffic on our neighborhood streets?

I-134-004

3. In addition, according to this table, the following outcomes have no significant increase over the base year:

- % of jobs accessible within 30 minutes by transit- from .70% to 1.07%
- % of work trips taken by transit – from 8.4% to 11.3%, most growth only within Seattle
- % of all trips taken by transit – from 2.1% to 2.9%

I-134-005

Please provide a statement explaining why these three measures are not forecast to move more positively as a result of the preferred alternative.

4. Why doesn't the Plan have more impact on growth management, reduction in SOV trips, vehicle miles traveled and transit ridership?

I-134-006

I-134-002 See Destination 2030, 2007 update for more information.

I-134-003 The transportation performance measures shown in the VISION 2040 Final EIS are based on the assumption (as determined in the initial Public Scoping Report) to use the same transportation system (as embodied in Destination 2030) as the basis for all of the VISION 2040 alternatives.

I-134-004 Issue best addressed at the local jurisdiction level.

I-134-005 The Final EIS has been updated to address this issue. The measures do move in a positive direction. Transportation improvements will be considered in the Destination 2030 update, which may improve these outcomes.

I-134-006 The Preferred Growth Alternative has a measurable, and positive, effect in supporting local growth management plans, reduces SOV trips as compared to the extension of current plans, and increases transit ridership as compared to the extension of current plans.

5. What is the status of WSDOT's historic commitment to keeping the HOV lanes functioning to State standards of 45 MPH 90% of the time? How does WSDOT report that this will be done given the increases in VMT and Hours of Delay?

I-134-007

6. Given the increase in VMT and Delay, provide further explanation about the reasons why the "Average Trip Distance" and "Average Trip Time" remain relatively unchanged?

I-134-008

7. Has PSRC run any models with the following assumptions:

- HOV 3 + on the HOV expressway lanes?
- Expanded Bus Rapid Transit on HOV and improved arterials?
- Transportation pricing applications? If yes, which ones?

Taking into account available modeling results, if any, please provide a professional estimate of how these strategies would generally influence transportation performance measures if included in the preferred alternative.

I-134-009

8. In general terms, please provide statements of what strategies the Region would have to implement in order to:

- Decrease overall congestion on our Freeways and Arterials?
- Significantly increase transit access, coverage, speed and reliability, span of hours within 3-5 years?
- Significantly increase pedestrian and bike mode share within 5-10 years?
- Significantly direct growth to existing urban areas?
- Significantly increase freight mobility?
- Repair, retrofit and replace our bridges, roads and trails?

I-134-010

COST

9. What is the most recent estimate of cost of full implementation of the Metropolitan Transportation Plan (MTP)? At a briefing by PSRC Staff, Shoreline City Council was told that it is now $140, not $105 Billion over the life of the Plan

I-134-011

10. What projects or costs created the $35 Billion increase over the past assumptions?

I-134-012

11. If this estimate is not in YOE and doesn't assume debt, what is the actual estimate in YOE and including financing costs?

I-134-013

12. What is the latest estimate of the remaining shortfall between available resources and estimated spending to complete the MTP if the Roads and Transit package passes in November? What is the gap if R&T does not pass?

I-134-014

13. What is the breakdown of investment in the MTP by percent across modes, both for capital and operating? Include roads, light rail, commuter rail, buses, and non –motorized.

I-134-015

I-134-007 Please see WSDOT's plans, or contact WSDOT staff for more information.

I-134-008 The Final EIS has been updated to discuss this issue.

I-134-009 One of the assumptions guiding the update (as determined in the initial Public Scoping Report) is to use the same transportation system (as embodied in Destination 2030) as the basis for all of the VISION 2040 alternatives. As such, the analysis noted in your comment would not be consistent with this initial assumption. Note, however, that these issues will be considered when Destination 2030 is updated.

I-134-010 VISION 2040 includes a regional growth strategy and multicounty planning policies (plus actions and measures) to address many of these issues. The current update of Destination 2030 will more specifically address needed transportation improvements and investments. Many of these issues are also addressed at the local level.

I-134-011 See Destination 2030, 2007 update for information.

I-134-012 See Destination 2030, 2007 update for information.

I-134-013 See Destination 2030, 2007 update for information.

I-134-014 See Destination 2030, 2007 update for information.

I-134-015 See Destination 2030, 2007 update for information.

14. What are the projected operating revenues and operating expenses per trip in YOE dollars for Metro buses? For Sound Transit buses? For light rail? For commuter rail?

I-134-016

DOCUMENTS

DRAFT Vision 2040
http://www.psrc.org/projects/vision/pubs/draftV2040/index.htm

SUMMARY OF KEY PERFORMANCE MEASURES- REGIONAL
Vision 2040 Draft SEIS
http://www.psrc.org/projects/vision/pubs/sdeis/index.htm
Chapter II Figure 2-8 Transportation Performance of Alternatives, Regional

http://www.psrc.org/projects/vision/pubs/sdeis/SDEIS%20Chapter%202.pdf

Includes:

- Daily Work and Non-Work Trips – SOV, HOV, Transit, Bike, Walking trips and Shares
- Daily Vehicle Miles Traveled
- Hours of Delay on Freeways and Arterials
- Average number of jobs within 30 minutes of transit

KEY PERFORMANCE MEASURES FOR EACH COUNTY:
Appendix 3; Section 3C - Overview of Key Models and Output Data Pages 75-84
http://www.psrc.org/projects/vision/pubs/sdeis/SDEIS%20Appendix%203.pdf

Thank you,

Maggie Fimia
Deputy Mayor, Shoreline

I-134-016 See Destination 2030, 2007 update for information.

VISION 2040

What do you think of VISION 2040? I-016
We want to hear from you.

need to make legends easier to read, so significance of maps clearer. Like descriptions, maps, lack of editorial comment.

I-016-001

I-016-002

☑ Yes! Please add me to the VISION 2040 mailing list.

NAME MARILYN HOLT
ADDRESS 6716 2nd Ave NW
CITY/STATE/ZIP Seattle, WA 98117
EMAIL mjholt@holtcapital.com

I-016-001 VISION 2040 has been revised to address this issue.

I-016-002 Thank you.

I-074

LMN ARCHITECTS

Norman A. Abbott, PhD, AICP
Director of Growth Management Planning
SEPA Responsible Official
Puget Sound Regional Council
1011 Western Avenue Suite 500
Seattle, WA 98104

Judson R. Marquardt, FAIA
John F. Nesholm, FAIA
Robert W. Wichmeyer, AIA
Mark Reddington, AIA
Walt W. Niehoff, Jr., AIA
Christopher J. Eseman, AIA

George H. Loschky, FAIA

September 4, 2007

Dear Mr. Abbott,

The Draft Vision 2040 and Supplemental Draft Environmental Impact Statements affirm PSRC's previoius directions to focus future development into locations that can create dynamic urban places of many sizes, from large and complex to those with small town attributes. This continues to be a positive course that ensures effective use of infrastructure, transit, and civic amenities. I certainly commend PSRC for this thoughtful "staying the course," but also adding important new dimensions, such as human health and sustainability, that reflect current issues of local, regional and global concern. An important new aspect also is one of accountability, so that we may measure efforts by communities and counties to achieve the larger vision over time. I-074-001

It is evident that these documents also reflect the participation of numerous individuals and organizations that helped frame them through your extensive outreach. Moreover, many of the observations and suggestions of the peer review panel seem to have been incorporated. I-074-002

However, I do have several comments that I would offer in the spirit of strengthening your collective efforts.

1. Would it be possible to structure a system of "rewards" for communities that take extra steps to achieve the regional goals? For example, if a community were to decide to accept more than its assigned population target? Or, help provide affordable housing? In my view, this would go beyond the annual awards program. Perhaps funding could be available for parks and open space. This might require working with the State to create a special fund. I-074-003

2. There should be a highly public way of reporting progress. Perhaps this could take the form of a "regional report card" with ratings for each county and community shown with established criteria. Other outcomes in society are given ratings, with LEED as a good model. Could PSRC develop a "managed growth certification" (gold, silver, etc ratings)? I-074-004

801 SECOND AVENUE, SUITE 501 SEATTLE, WASHINGTON 98104 **206.682.3460** FAX 343.9388

I-074-001 Thank you.

I-074-002 Comment noted.

I-074-003 This provision was not included, although PSRC funding priorities are clearly tied to VISION 2040 policies.

I-074-004 VISION 2040 has addressed this issue, with the Implementation section calling for a State of the Region report, wherein the monitoring activities will be published on a regular basis. Other monitoring reports also will be developed. Please note that the initial monitoring provisions in VISION 2040 are a starting point and will be further developed and expanded.

LMN ARCHITECTS

3. The directions established by the PSRC Vision 2040 suggest that we will be living in different ways, in different forms – more urban, more mixed, more dense. But unfortunately in this region, we have not had a very rich array of housing choices for denser urban areas. We still tend to have mainly versions of "stacked flats" – whether rental apartments of condominium. PSRC could perform a very valuable service if it could assist in exposing communities and the development industry to different types of urban housing, such as attached row houses as seen in other cities. I realize this is outside the format of the Vision and EIS documents, but it might be the topic for a future forum, under the heading of "Implementing Vision 2040."

I-074-005

4. Figure 1-2 of the Supplement DEIS, which displays growth projections, indicates a very large increase in population within unincorporated Snohomish County (and to a somewhat lesser, but no less significant, degree in Kitsap County). Much of this likely falls within the expected expansion areas of various cities. However, the form and quality of development may not be consistent with that desired by the cities. Knowing the pace of development in these areas, the consequence could be patterns of development not dense enough to encourage either transit use or the provision of nearby goods and services and they may be out-pacing any ability to provide parks and other community facilities. Can some mechanism be devised to ensure appropriate forms, densities and mixes of uses during the period before annexation?

I-074-006

5. The long term vision set forth through PSRC efforts can be frustrated by local regulations that intentionally or inadvertently prevent certain forms of development from happening. While a number of jurisdictions have taken steps to re-do their codes and ordinances, a lot of work remains to be done. And there are still many "unofficial codes," such as standards by public works agencies and school districts that reflect a suburban model that is land consumptive and presumes scattered, single-use development patterns. PSRC should find ways of highlighting and promoting models both within the region and elsewhere that can encourage and sustain more focused and mixed development. In many cases this means not just tinkering with codes and standards that have been around for decades, but discarding them altogether and developing simpler, more concise regulations – especially those that can address the quality of development, not merely the quantity.

I-074-007

I hope these comments will be useful in further deliberations and refinements of the Vision 2040 endeavor.

Sincerely,

Mark Hinshaw FAIA FAICP

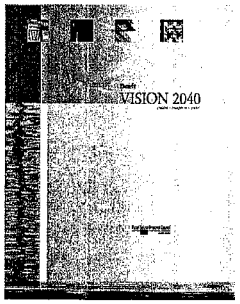
801 SECOND AVENUE, SUITE 501 SEATTLE, WASHINGTON 98104 **206.682.3460** FAX 343.9388

I-074-005 VISION 2040 has been revised to address this issue. See DP-Action-9 and DP-Action-10.

I-074-006 VISION 2040 has been revised to address this issue. See what are now policies MPP-DP-22 through MPP-DP-27 in the final document.

I-074-007 VISION 2040 has been revised to address this issue. DP-Action-10 now includes this statement: "This action will include highlighting and promoting model codes."

1-089-



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CONTACT INFORMATION:

At a minimum, please provide your name, the county in which you live, and ZIP Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

NAME MARK WEBBER

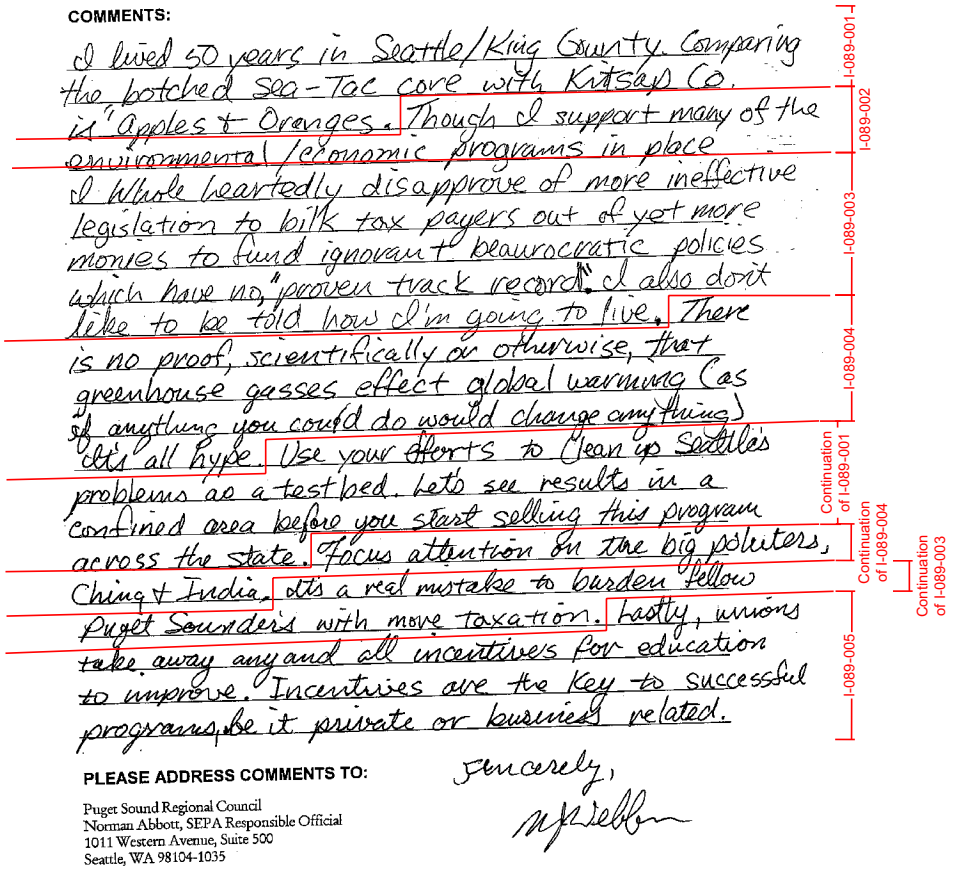
ORGANIZATION

ADDRESS 5931 WATAUGA BEACH DR E.

CITY PORT ORCHARD STATE WA ZIP 98366

E-MAIL ☑ CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.



COMMENTS:

I lived 50 years in Seattle/King County. Comparing the botched Sea-Tac core with Kitsap Co. is "Apples & Oranges." Though I support many of the environmental/economic programs in place I Whole heartedly disapprove of more ineffective legislation to bilk tax payers out of yet more monies to fund ignorant bearocratic policies which have no "proven track record." I also don't like to be told how I'm going to live. There is no proof, scientifically or otherwise, that greenhouse gasses effect global warming (as if anything you could do would change anything) It's all hype. Use your efforts to clean up Seattle's problems as a test bed. Let's see results in a confined area before you start selling this program across the state. Focus attention on the big polluters, China & India. It's a real mistake to burden fellow Puget Sounders with more taxation. Lastly, unions take away any and all incentives for education to improve. Incentives are the key to successful programs, be it private or business related.

Sincerely,

M Fielbon

PLEASE ADDRESS COMMENTS TO:

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

I-089-001 Comment noted.

I-089-002 Thank you.

I-089-003 Comment noted.

I-089-004 Comment noted.

I-089-001 (continued) See response to previous I-089-001.

I-089-004 (continued) See response to previous I-089-004.

I-089-003 (continued) See response to previous I-089-003.

I-089-005 Comment noted.

P.S. I wish to be added to the project mailing list.

Maxine Keesling
15241 NE 153rd Street
Woodinville, WA 98072
(425) 483-8523

I-070

September 3, 2007

Norman Abbott, SEPA Responsible Official
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle WA 98104-1035

RE: Public Comment on the Draft VISION 2040.

If Man's brain is deemed adequate to improve failing eyesight, hearing and other of Man's ailments, then Man's brain should be deemed adequate to, for Man's purposes, change/improve significant areas of Man's habitat, especially considering governmental jurisdictions own over 50 percent of King County and that private property rights ARE important. Following are specific comments on Vision 2040 strategy:

1. Back-to-pre-European-nature.

The page 7 et al emphasis on preserving/restoring nature results in prohibiting Man/residing in and/or using private property habitats of choice. I-070-001

2. Wetlands.

Page 7 also correctly notes that wetlands filter pollutants from water. (So why the current emphasis on using DRYLAND buffers to filter the pollutants in order to prevent those pollutants from even REACHING the wetlands?) I-070-002

3. Compact development.

The page 11 strategy of focusing growth in "compact development patterns" in urban areas currently results in the highrise residents driving long distances to forests, waterfront and other recreation areas on weekends and holidays, instead of puttering in their now out-of-fashion yards. (Has this impact been analyzed?) I-070-003

4. Environmental restoration.

The "ENVIRONMENT" section on pages 27/28 emphasizes the preservation and restoration of "natural systems", with developers assigned major costs and responsibilities of restoring "damaged lands and estuaries to more natural states (with) increased open space." The mitigation required of developers undoubtedly represents the wellspring of funding for the "good opportunities for us to restore our watersheds, ... enhance habitat, and pioneer new technologies and industries . . ." (It is to be hoped that our new technologies and industries do not mainly consist of those related only to environmental restoration.) I-070-004

5. NEW: SHORELINES as a "NATURAL RESOURCE."

BUT THE REAL SHOCKER IN THIS VISION 2040 DOCUMENT IS FOUND ON PAGE 18 UNDER "NATURAL RESOURCE AREAS", WHERE FOR THE FIRST TIME EVER I SEE THAT SHORELINES MAY BE DESIGNATED AS NATURAL RESOURCE AREAS. (Please inform me where, in the state RCWs, is the authorization for the Puget Sound Regional Council to so materially change the traditional definition of natural resources as found in the natural resources chapter of King County's comprehensive plan: I-070-005

"King County's Natural Resource Lands are those with long-term commercial significance for farming, forestry, and minerals."

Maxine Keesling

I-070-001 Do not concur.

I-070-002 The buffers are required to keep the wetlands from becoming polluted, and provide other benefits such as shading and nutrients.

I-070-003 Comment noted.

I-070-004 Development fees are in important source of funds for local governments to use to mitigate the impacts of growth.

I-070-005 VISION 2040 has been revised to address this issue.

attachment
O-170

The Urban Form and Climate Change Gamble

How transportation and land development affect greenhouse gas emissions.

By Lawrence D. Frank, Sarah Kavage, and Bruce Appleyard, AICP

Call it whatever you want: climate change, global warming, or as in Europe, "climate chaos." Just recognize a few things: The world's climate is changing, humans are at least partially responsible, and we as planners have an opportunity—and a responsibility—to respond.

April 2007 may be the month that really got our attention. On April 2, the U.S. Supreme Court handed down a ruling underscoring public agency responsibility to reduce greenhouse gas emissions. In this "tailpipe" case *(Massachusetts vs. EPA)*, the court rejected the U.S. Environmental Protection Agency's claim that the Clean Air Act could not be used to regulate carbon dioxide emissions from vehicles. Going beyond the plaintiffs' request, the Court surprised many by citing the scientific evidence directly linking tailpipe emissions to global warming.

According to Trip Pollard, senior attorney for the Southern Environmental Law Center, the decision "sends a clear message that action is needed." Planners and politicians have a leading role to play

Note: This page of comments does not require a response.

reducing energy consumption from personal travel—by investing in more fuel-efficient forms of transportation and land-use patterns that support those options.

On April 6, the Intergovernmental Panel on Climate Change—a global group of scientists created in 1988 by the United Nations Environment Programme and the World Meteorological Organization—released the second of four assessment reports it will issue this year. The April report stated unambiguously that global warming is already harming the environment.

Impacts include more extreme weather patterns, such as drought, heat waves, and flooding; more catastrophic weather events such as hurricanes and tropical storms; the melting of glaciers and polar ice sheets; and a rise in sea level. These changes will lead to displacement of people living in coastal areas and on low-lying islands, and they will destroy habitat and species. Potentially 25 to 30 percent of the world's plant and animal species are at risk of extinction, according to the second IPCC report.

According to NASA climatologist James Hansen, the next 10 years provide a critical window of opportunity before we reach a tipping point. After that, mitigating global warming will be increasingly difficult and the impacts more severe.

Projections suggest the need to reduce the absolute level of greenhouse gas emissions by 80 percent by 2050. Emissions from automobiles and light trucks are a large and growing share of overall greenhouse gas emissions. Strategies to reduce emissions from personal transportation will very likely need to do two things: reduce energy use per unit of distance traveled and decrease per capita distances traveled. Although improvements in fuel and vehicle technology can help, land-use and transportation planning that reduces vehicle demand is crucial, especially in light of population growth, if we are to achieve these goals.

Policy framework

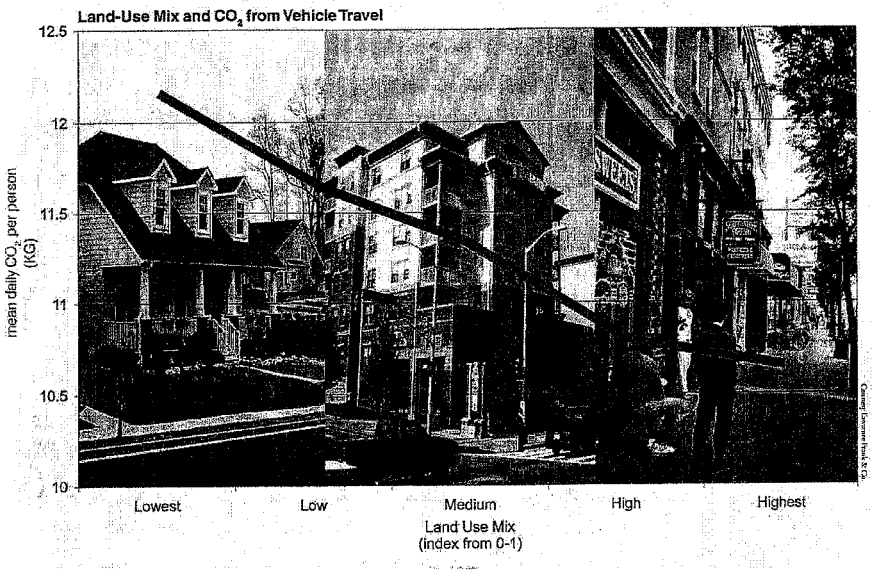
In 1992, the international community convened the United Nations Framework Convention on Climate Change to develop ways to mitigate global greenhouse gas emissions. The agreement negotiated by the UNFCCC became the Kyoto Protocol, adopted in 1997. That agreement became effective in 2005. It set binding targets for developed nations to reduce greenhouse gas emissions by seven percent below 1990 levels; the target date is 2012.

However, it is unlikely that those targets will be met under the current Kyoto framework. The U.S., the nation with the highest per capita emissions of greenhouse gas emissions, signed the Kyoto Protocol but has refused to ratify the treaty. China is the second largest worldwide generator of greenhouse gases, yet it is considered a developing nation under Kyoto, and is exempt.

In the absence of national leadership, efforts by a number of U.S. states, regions, and cities have put policies or other actions in place that meet the requirements of the Kyoto Protocol. Ron Sims, executive of King County, Washington, has established numerous initiatives to address climate change through transportation investments and land use. Seattle Mayor Greg Nickels, alarmed at low levels of snowfall in the Cascade Mountains, Seattle's main water source, drafted the U.S. Mayors Climate Protection Agreement, which 435 mayors have signed to date.

Californians recently voted in the Global Warming Solutions Act, the first enforceable statewide program in the nation. The law caps California's greenhouse gas emissions at 1990

Planners instinctively know that low-density development requires more driving and therefore produces more carbon dioxide. Figures from a King County, Washington, study bear that out.



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There's Hope, But We'd Better Get Started

We humans very likely created this mess, but we have the ability to clean it up—and some of the cleanup tasks can be done locally. That is the message of three reports issued this year by the Intergovernmental Panel on Climate Change.

With hundreds of authors and 2,500 reviewers from around the world, the IPCC reports have the weight of authority behind them. Teams of scientists have been at work on the latest series of IPCC reports since 2004.

A range of engineering and behavioral solutions is offered in the latest summary report, issued in May, as well as in final drafts of the longer version that will expand on that summary. Throughout the documents, researchers note the benefits of incorporating sustainable growth across a broad range of policies.

"We can do this. The solutions exist," says Annie Strickler, spokesperson for ICLEI—Local Governments for Sustainability, a Toronto-based organization with about 550 government and organizational members worldwide.

According to the May IPCC summary, more energy efficient buildings could avert 30 percent of projected emissions by 2030. A table of options includes improved insulation, alternative refrigeration fluids, more efficient appliances, solar technology, and intelligent meters that provide feedback.

One drawback is that builders must find a way to pass some of the higher up front costs along to home buyers—and home buyers typically resist, says IPCC member Billy Pizer, a senior fellow at Resources for the Future, a research organization based in Washington, D.C. "Because of these [market] failures, I think the only way to get at this sort of opportunity is through building codes," says Pizer.

Local officials must take the lead, says IPCC member Charles Kolstad, professor of environmental economics at the University of California, Santa Barbara. "Nobody else is essentially in charge of the development of housing stock."

The IPCC summary also lists transportation improvements, including more carpooling, mass transit, fuel-efficient vehicles, and urban planning that reduces the need for travel. In waste management, it cites opportunities in landfill methane recovery and composting of organic waste.

Such opportunities notwithstanding, the summary says that local and regional efforts have limited impact on their own. Significant progress requires national action, the IPCC says. In the U.S., an accident of timing provides new political cover for policy changes. The appearance of the IPCC report on the heels of former Vice President Al Gore's Academy Award-winning film, *An Inconvenient Truth*, gave them wider currency with the public.

Despite the vastness of the subject, each summary is no more than three dozen pages. The summaries involved some political compromise—and complaints that governments intervened to water down some conclusions. The groups also are working on much longer versions to be released later.

The three summaries are:

• "The Physical Science Basis," issued in February. Human-caused greenhouse gases "very likely" caused most of the increase in global temperatures since the mid-20th century. Eleven of the last 12 years rank among the warmest on record (since 1850). Estimated sea levels rose more than half a foot in the 20th century. Changes include increases in North Atlantic hurricane intensity since about 1970; more intense and longer droughts; decline of mountain snow cover; more precipitation in eastern North America; and more heavy storms over most land areas. Further sea-level rise of seven to 23 inches in the 21st century

Tasseled sugarcane growing in Canal Point, Florida. The Intergovernmental Panel on Climate Change says that using renewable fuels is one way to cut carbon emissions.

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projected. Future hurricanes are likely to be more intense.

• "Impacts, Adaptation and Vulnerability," issued in April. In the future, there will be greater risk of drought, water supply shortages, species extinction, wetlands damage, and flooding. North America projections include smaller snowpack and lower summer flows in the western mountains; problems in forests from pests, diseases, and fire; more heat waves; and more stress on coastal communities and habitats.

• "Mitigation of Climate Change," issued in May. There are choices to be made between the economic costs of rapidly reducing emissions now and the environmental costs of delaying. The energy supply sector had a 145 percent increase in greenhouse emissions between 1970 and 2004, the largest of any sector. Upgrades of energy infrastructure in industrialized nations can limit emissions. Options from existing and emerging technologies include renewable energy, nuclear power, and sequestration of carbon dioxide.

A fourth report due out in November will integrate information from the three reports. The summaries are available at www.ipcc.ch.

Fred Ludwig

levels by 2020. Mandatory caps will begin in 2012 for significant sources and ratchet down to meet the 2020 goals.

Looking at the long term

According to data from the U.S. Department of Energy's 2005 Annual Energy Outlook, the transportation sector accounted for 32 percent of all U.S. carbon dioxide emissions in 2002—the largest share. The Environmental Protection Agency reports that most of the increase in carbon dioxide emissions between 1990 and 2000 came in the transportation sector, more than three-fifths of it from passenger cars and light trucks: vans, pickups, minivans, and sports utility vehicles.

Any policy that seeks to reduce transportation-related carbon dioxide emissions will require some combination of the following: better vehicle fuel technology, increased vehicle economy, and reducing travel demand.

• Fuels: Biofuels (ethanol, biodiesel) can be encouraged as alternatives to petroleum-based fuels because they emit less carbon dioxide per gallon. Each gallon of gasoline weighs about six pounds in the tank but turns into about 20 pounds of carbon dioxide in the atmosphere.

• Vehicle efficiency: Regulations and incentives for electric, hybrid, or other low-emission vehicles are the primary policy tools to address vehicle efficiency. An SUV emits one ton of carbon every 1,300 miles, compared with some hybrid cars that can go more than four times as far (6,000 miles) for that much carbon.

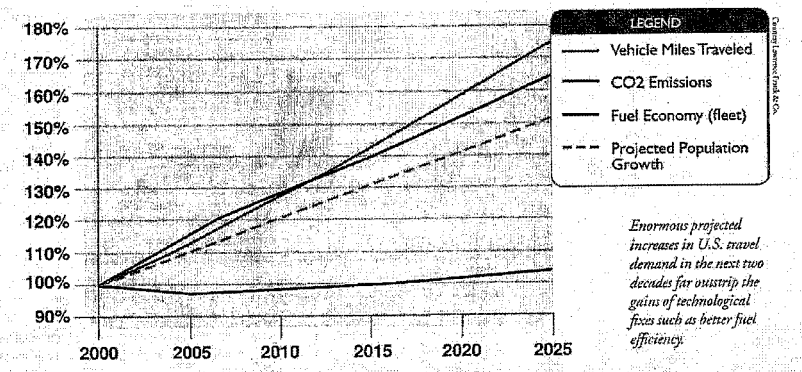
• Travel demand: This measure is often determined by the vehicle miles traveled or vehicle hours traveled. Demand for car travel can be decreased in several ways, including transit investments, better land-use planning and design, transportation demand management, and road pricing.

The big gamble

For policy makers, understanding which of these policy levers to pull—and how hard to pull them—is both a political and a global warming gamble. The U.N. Framework Convention on Climate Change documented in a 2003 report that most current policies that address global warming focus on technological fixes such as vehicle and fuel efficiency, partly because this focus has been far more politically acceptable than behavior modification such as reining in car travel.

However, in the U.S. and around the world, travel demand is increasing much faster than a technology-and-fuel solution can handle. On the technology side, ethanol and biodiesel, while an improvement, are still carbon-intensive fuels that require substantial amounts of petroleum

Are "Techno-fixes" Overpromised?



Enormous projected increases in U.S. travel demand in the next two decades far outstrip the gains of technological fixes such as better fuel efficiency.

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to produce. On the fuel side, VMT and land consumption have outstripped improvements in fuel economy. In fact, growth in fuel economy is barely keeping up with growth in population.

In two scenarios tested in collaboration with the Center for Clean Air Policy—a Washington-based nonprofit—we looked at the changes needed to reduce greenhouse gas emissions by 80 percent from current levels in the Puget Sound region by 2050, given projected population increases. The "medium technology" scenario, which increased fuel efficiency to 48 miles per gallon fleetwide and reduced greenhouse gas emissions to 15.7 pounds per gallon, would still require a 61 percent decrease in VMT per capita to meet the target.

Even an "aggressive technology" scenario, which assumes 75 miles per gallon and cuts greenhouse gas emissions per gallon of fuel nearly in half, would still need to cut per capita VMT by nearly 20 percent. According to estimates by the Center for Clean Air Policy, this aggressive scenario requires a 287 percent increase in fuel economy fleetwide. A turnover in the fleet takes nearly 20 years, and it takes time to develop these new fuel-efficient vehicles and to put them into production. Unfortunately, fuel economy has been flat for over a decade.

This large gap also makes it clear that reductions in vehicle demand must be part of any serious strategy to address climate change. Pricing efforts, such as road or parking pricing, and demand management strategies, such as worksite transit passes, are a next step and can be implemented relatively quickly compared to changes in the built environment.

[redacted]

What Still Needs to Be Studied

- Household carbon footprints. Multifamily buildings are more energy efficient than single-family houses: They produce fewer household carbon dioxide emissions due to lower VMT, and they conserve heat by sharing walls. However, we still need to study household heating, a large source of carbon dioxide emissions.
- Regional location versus community design. Although researchers know that both regional location of housing and jobs and neighborhood-scale community design affect carbon dioxide emissions, there has been no comprehensive examination of both factors.
- Effects of programmatic strategies. We need to understand how demand management, pricing, and parking management can reduce per capita carbon dioxide emissions in tandem with land-use changes and transit service investments.
- Impacts of transit investment. The potential reductions in carbon dioxide from transit service increases are not well understood or measured, especially since more transit service means more carbon emissions (from the transit vehicles themselves).

[redacted]

However, incentives and disincentives can do little to effect change on their own unless people have reasonable alternatives to driving—such as an efficient transit system for regional travel and land-use patterns that support walking and bicycling for local trips.

Urban form and emissions

Planners understand that typical post-World War II development patterns in the U.S.—low-density, disconnected, single-use development and inadequate transit—oblige people to drive greater distances and make more trips by car. Sprawling urban regions not only encourage automobile use—they require it. Thus many Americans rely on their cars for nearly every commute; shopping, eating, and entertainment trips; and even recreational trips to a park.

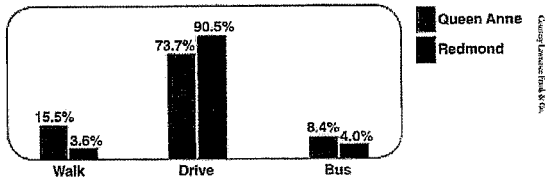
In contrast, compact communities with a mix of land uses and a highly connected street network are associated with fewer vehicle miles and trips and more bicycling and walking per capita. They have also been linked to lower per capita levels of other emissions (such as ozone), and, more recently, to lower per capita carbon dioxide levels.

Land use and transportation are connected at both the regional and neighborhood scales.

Alan Pisarski's book, *Commuting in America*, shows that people often commute regionally—from suburb to center city, from center city to suburb, and between suburbs. Commuting trips are generally the longest regular trips that most people make, and they often make them alone. Having fast and reliable transit connections between regional centers could lead to

Right: Residents walk more and drive less in Queen Ann, an older mixed use neighborhood in Seattle, than in North Redmond, a residential neighborhood in a nearby suburb, according to a study.

Below: Meeting Puget Sound's 2050 greenhouse gas emission goals will take not only increased fuel efficiency but also a hefty reduction in vehicle miles traveled.



Courtesy Lawrence Frank & Co.

VMT Reduction Required to Meet 2050 Puget Sound GHG Goals

		Total Fleet Fuel Economy		New Vehicle Fuel Economy*		Fuel Mix		Vehicle Demand	
Scenario	Year	MPG	Change	MPG	Change	Ghgs (lb/gl)	Change	VMT per capita	Decrease
Reference	2005	19.6	0%	19.7	0%	19.64	0%	23.3	0%
Base	2050	19.6	0%	19.7	0%	19.64	0%	28.2	21%
Medium Tech	2050	48.2	146%	58.1	195%	15.7	-20%	9.0	-61%
Aggressive Tech	2050	75.6	286%	94.5	381%	11.8	-40%	19.0	-18%

*approximate values

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relatively large reductions in per capita vehicle miles and hours of travel.

At the neighborhood level, places that support walking and bicycling will help to reduce the need for cars for shorter trips that are unrelated to work: errands, trips to school, or recreational trips.

In the first phase of the HealthScape study in King County, Washington, we tested the relationships between various land-use characteristics, travel behavior, and carbon dioxide emissions in the Seattle area. Although some researchers have begun to look at the connection between land-use patterns and greenhouse gas generation, few have taken a detailed look at the specific land-use characteristics that are related to carbon dioxide emissions.

The HealthScape analysis relied on travel information from more than 6,000 households in the 1999 Puget Sound Regional Household Activity Survey. To estimate the level of greenhouse gas emissions and associate these emissions with urban form, we worked with the Center for Clean Air Policy to create a method of breaking vehicle trips into links. Emissions levels were assessed for each link of each trip in the regional survey based on the road type (local, collector, arterial, freeway, etc.) and time of day.

This approach, described in detail in "Many Pathways from Land Use to Health," published in the Winter 2006 issue of the *Journal of the American Planning Association*, is a much more detailed measurement than the standard methodology, which uses a simple average speed for each trip. Further, this approach accounted for engine operation such as increased emissions during warm-up periods or "cold starts."

The emissions measures for each trip were linked to each household's neighborhood walkability, as measured by the level of residential density, land-use mix, and intersection density within a quarter-mile walking distance of each household location in the regional survey. We found that, controlling for demographics, vehicle ownership, and distance to transit, people who lived in highly walkable areas generated less carbon dioxide—primarily because they traveled fewer miles per capita.

When we repeated the same analysis of urban form variables and also controlled for per capita VMT, we found that urban form still explained some variation in greenhouse gas emissions above and beyond its more direct relationship with VMT. We assume this to be due to systematic differences in average speed, vehicle occupancy rates, and differences in emissions across modes of travel.

To illustrate what changes in land use might mean for carbon dioxide emissions, we compared the land-use patterns and mode share of two areas in the Seattle region: Queen Anne, an older, mixed use neighborhood in central Seattle, and North Redmond, a residential neighborhood in the suburb of Redmond, about 15 miles from downtown Seattle. In Queen Anne, residents walked more and used transit more often; they also drove less.

When considering the scale of changes needed to reduce driving, these two communities serve as a reminder that major differences in urban form exist at the regional level—and creating more neighborhoods like Queen Anne could have a tangible impact on carbon dioxide emissions and vehicle demand.

How do alternative approaches to land development and transportation investments affect climate change? We will be examining this question in phase two of King County's HealthScape project. Research results from phase one are being incorporated into a modeling tool that can assess the relative climate change impacts and benefits of different approaches to land development, street network design, and transportation investments. A report on the findings is expected next spring.

The next battles

In addition to planning for more walkable areas at the local level, urban regions should coordinate land-use and transportation planning and make substantial investments in transit service, particularly in existing centers. Planners can help create better connections between local travel modes (bicycling, walking) and regional ones (transit).

Deciding where to begin to fill the gaps in current transit, walking, and bicycling infrastructure will be important, as will deciding how to sequence investments within corridors in relationship to existing and projected needs. Urban growth boundaries, urban service areas, distance-based impact fees, creative parking strategies, and infrastructure requirements will also help to reduce reliance on private vehicles and lower per capita carbon dioxide emissions.

Despite the nation's car culture, a number of recent studies have documented an increasing demand for more walkable environments. Household characteristics are changing, with smaller families and more baby boomers wanting to live in places where they can walk and use transit. The research has also documented other benefits to more compact, walkable urban regions, such as reduced per capita air pollutants and lower obesity rates, which are otherwise becoming serious public health concerns.

In "Leadership in a New Era," which appeared in the *Journal of the American Planning Association* last year, Arthur C. Nelson, FAICP, argued that over half of the built environment in the U.S. 25 years from now will be built from today forward, giving planners "an unprecedented opportunity to shape the landscape."

According to the IPCC scientists, we are also approaching a cliff—namely, our last chance to curb global climate change; any serious effort needs to substantially reduce the current demand for vehicle travel. As it happens, a growing number of state and local governments are recognizing this need. A first good step is to simply get out of the way. Planners should act quickly and decisively to remove the regulatory barriers (as argued by Jonathan Levine in his recent book, *Zoned Out*) and make it legal to build communities that are less auto reliant and meet the growing demand for a more walkable, sustainable future.

Lawrence D. Frank is the J. Armand Bombardier Chair of Sustainable Transportation Systems at the University of British Columbia, senior nonresident fellow at the Brookings Institution, and president of Lawrence Frank and Company. Sarah Kavage is special projects manager at Lawrence Frank and Company. Bruce Appleyard is the coauthor of the recently released, updated version of *The Land Use/Transportation Connection* (Planning Advisory Service Report 546/547). The authors thank Steve Winkelman, transportation manager at the Center for Clean Air Policy, for his work on vehicle demand and climate change impacts, which was invaluable in the development of this article.

Resources

Online. For more on the emissions methodology described in this article, see www.planning.org/japa/pdf/JAPAFrank06.pdf. The King County HealthScape project (formerly LUTAQH): www.metrokc.gov/exec/news/2006/pdf/LUTAQH-updated.pdf. Also see: the Center for Clean Air Policy: www.ccap.org. The Intergovernmental Panel on Climate Change: www.ipcc.ch. U.K. Treasury Report, "The Economics of Climate Change" (the Stern Report): www.hm-treasury.gov.uk. National Resources Defense Council: www.nrdc.org.

More. Current court cases addressing greenhouse gas emissions: www.warminglaw.com. ICLEI—Local Governments for Sustainability: www.iclei.org. *The Land Use/Transportation Connection.* Planning Advisory Service Report Nos. 546/547: www.PlanningBooks.com. City Parks Forum briefing paper on climate change management: www.planning.org/cpf/briefingpapers.htm. U.S. Green Building Council: www.usgbc.com.

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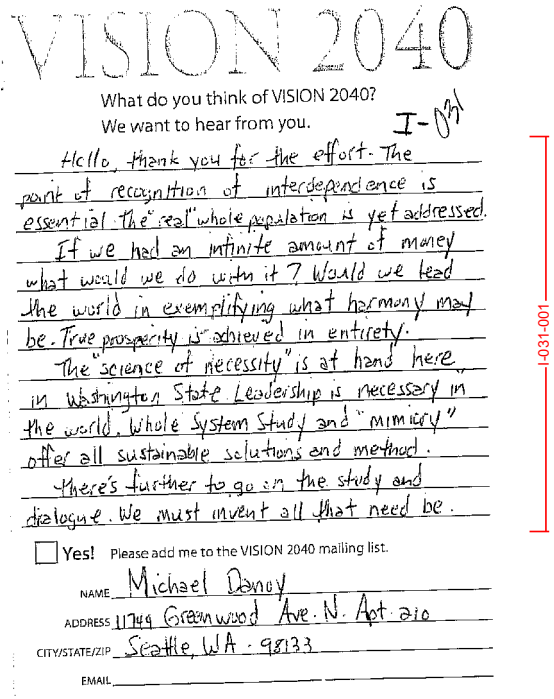


VISION 2040

What do you think of VISION 2040?
We want to hear from you.

I-031

Hello, thank you for the effort. The point of recognition of interdependence is essential. The "real" whole population is yet addressed.

If we had an infinite amount of money what would we do with it? Would we lead the world in exemplifying what harmony may be. True prosperity is achieved in entirety.

The "science of necessity" is at hand here in Washington State. Leadership is necessary in the world. Whole System Study and "mimicry" offer all sustainable solutions and method.

There's further to go in the study and dialogue. We must invent all that need be.

☐ Yes! Please add me to the VISION 2040 mailing list.

NAME Michael Doney

ADDRESS 11749 Greenwood Ave. N. Apt. 210

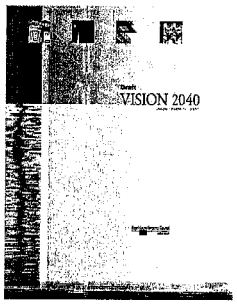
CITY/STATE/ZIP Seattle, WA. 98133

EMAIL

I-031-001

I-031-001 Comment noted.

Bremerton Open House
8/8/07 I-039



Draft VISION 2040

And Supplemental Draft Environmental Impact Statement

Comment Form

What do you think about the draft regional growth strategy and multicounty policies in VISION 2040?

We want your input and need to hear from you!

The public comment period lasts from Monday, July 16 through Friday, September 7, 2007.

The public is encouraged to provide thoughts, ideas, and concerns on the Draft VISION 2040. Comments can be made in one of the following ways:

- By writing to Norman Abbott, State Environmental Policy Act (SEPA) Responsible Official, at the Puget Sound Regional Council, 1011 Western Ave, Suite 500, Seattle WA 98104-1035
- By visiting the Regional Council's Web site www.psrc.org. To submit a comment, go to the Comment section of the VISION update Web page and follow the instructions.
- By sending an email to vision2040@psrc.org.
- By attending any of the Regional Council's board, committee, or other meetings and submitting a comment. A public comment period is offered at the beginning of each meeting.
- By returning this comment form.

The comments that you make will become part of the public record for this project. Your thoughts will help decision makers as they finalize VISION 2040 in fall 2007. Responses to your comments will be provided in the Final Environmental Impact Statement.

Regional VIEW, the Regional Council's monthly newsletter, is one good way to stay informed and involved. To receive a print copy of *Regional VIEW*, visit http://www.psrc.org/publications/pubs/view/viewform.htm, or call 206-464-7090.

CONTACT INFORMATION:

At a minimum, please provide your name, the county in which you live, and ZIP Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

NAME Michael Gustavson

ORGANIZATION Kitsap County Planning Commission

ADDRESS P.O. Box 1

CITY Southworth STATE WA ZIP 98386

E-MAIL michaelgustavson@mac.com ☒ CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.

• HAVE YOU ALL READ "THE VANISHING AUTOMOBILE AND OTHER URBAN LEGENDS"?
• BOTH RELATE TO PUBLIC INFRASTRUCTURE:
  • 90% OF HARDSCAPE IN THE US IS ROADS. WHAT DOES THIS PLAN DO TO ELIMINATE POLLUTANTS FROM ROADS ENTERING PUGET SOUND
  • HOW WILL THIS PLAN PROTECT PUGET SOUND FROM ENDOCRINE DISRUPTORS FROM BEWER OUTFALLS? (JUNE 7, 2007 NEWSWEEK)

COMMENTS:

• INCREASE THE PORTION OF FUNDING TO SCIENCE IN YOUR BUDGET.
• IN SEATTLE, 47% OF RIDES ARE ON MASS TRANSIT. SOUND TRANSIT HOPES TO PROVIDE 2% OF RIDES, 1/2 OF WHICH WILL COME FROM ~~FREE~~ BUS RIDERS. SOUND TRANSIT WILL COST 50% OF THE TOTAL TRANSPORTATION BUDGET. WHAT IS THE PLAN FOR MOVING THE REMAINING 95% AS POPULATION GROWS?

• IN KITSAP COUNTY, DURING THE PAST 15 YEARS, ELECTED OFFICIALS HAVE NOT PLACED BOND ISSUES BEFORE THE ELECTORATE TO FUND CONSTRUCTION SEWER AND ROAD INFRASTRUCTURE INSIDE URBAN GROWTH AREAS. AS URBAN GROWTH AREAS HAVE BEEN EXPANDED, LITTLE GROWTH HAS OCCURRED WHERE PLANNED BECAUSE SMALL PARCEL OWNERS CANNOT AFFORD THE COST OF SEWER AND ROAD EXPANSION. WHAT IS THE REALISTIC PLAN FOR PUBLIC INFRASTRUCTURE CONSTRUCTION?

• RURAL LOTS OUTSIDE UGAs ARE BEING QUICKLY BUILT WITH RESIDENTIAL SINGLE FAMILY HOUSING. THIS WILL PRECLUDE EXPANSION OF UGAs AS GROWTH CONTINUES. HOW DOES YOUR PLAN DEAL WITH THIS NATURAL ROAD BLOCK?

PLEASE ADDRESS COMMENTS TO:

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

• HOW DO YOU INCENTIVISE ONE TO RIDE TO THE GROCERY STORE AND DRAG YOUR GROCERIES HOME FROM THE BUS STOP IN THE RAIN?

• CONSTRAINTS ON ANY COMMODITY ALWAYS RESULTS IN HIGHER PRICE. RESTRICTIONS ON LAND USE WILL RAISE HOUSING COSTS.

I-039-001 VISION 2040 has been revised to strengthen the discussions on climate change, air quality, and transportation impacts with regard to pollutants.

I-039-002 The environmental policies in VISION 2040 have been strengthened to address water issues. Action needs to be taken by service providers.

I-039-003 VISION 2040 promotes a balanced transportation system that provides choices. More detail and specific investments will be considered when Destination 2030 is updated.

I-039-004 VISION 2040 calls for focusing growth and infrastructure investments. Specific implementation is a local issue.

I-039-005 The VISION 2040 provides regional guidance and policies to address rural growth.

I-039-006 Comment noted.

I-039-007 Comment noted.

I-038

Robin McClelland

From: FormProcessing@psrc.org
Posted At: Tuesday, August 07, 2007 1:10 PM
Conversation: Draft VISION 2040 Comment
Posted To: Vision 2040

Subject: Draft VISION 2040 Comment

Hello!
This is results of submitted form by 147.56.178.216.

Submitter Email : FormProcessing@psrc.org

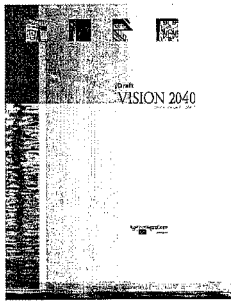
Fields:
01.name = Michael Wilkins
02.address = 4109-65th Ave E
03.city = Fife
04.state = WA
05.zip/postalcode = 98424
06.email = wilkima@dshs.wa.gov
07.comments = I would like to see Vision 2040 include an infrastructure for better highways, alternative modes of transportation and coordinated transporation routes for rural areas.
08.mailing list = yes
09.mailtype = email
mailto = vision2040@psrc.org,dmclaughlin@psrc.org
subject = Draft VISION 2040 Comment

I-038-001

1

I-038-001 What is now MPP-T-28 in the final document is clearer about the conditions under which new or expanded roads in rural areas or resource lands are appropriate. This is consistent with the goals in the Growth Management Act. VISION 2040 supports a multimodal transportation system. The update of Destination 2030 (to be completed in 2010) will address more specific transportation issues.

I-022



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CONTACT INFORMATION:

At a minimum, please provide your name, the county in which you live, and ZIP Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

NAME Mike Williams

ORGANIZATION DSHS Region 5

ADDRESS 2121 S State St. 1st Floor

CITY Tacoma STATE WA ZIP 98405

E-MAIL willima@dshs.wa.gov ☑ CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.

Comment Letter

COMMENTS:

A. CREATE & SUSTAIN AFFORDABLE TRANSIT MODALITIES IN RURAL & URBAN AREAS.

B. BETTER COORDINATION OF ALL MODES OF TRANSPORTATION

C. CLARIFY THAT SUSTAINABILITY TO INCLUDE SCIENTIFIC IMPACTS

I-022-001

I-022-002 I-022-003

PLEASE ADDRESS COMMENTS TO:

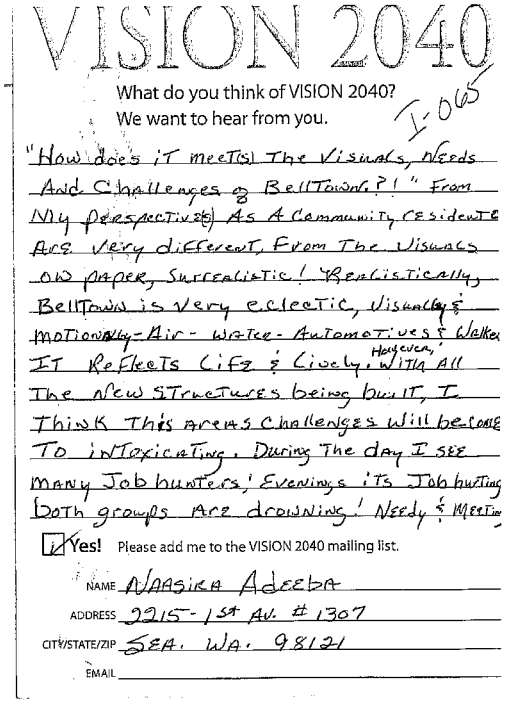
Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

Response to Comment Letter

I-022-001 A strong objective of VISION 2040 is a highly efficient, multimodal system that supports the Regional Growth Strategy and addresses mobility choices, increasing alternatives to driving alone. More choices may result in "affordable transit."

I-022-002 Comment noted. See what are now T-Action-6, T-Action-7, and T-Action-16.

I-022-003 VISION 2040 has been revised to more fully explain sustainability.



VISION 2040

What do you think of VISION 2040?
We want to hear from you.

I-065

"How does IT meet(s) The Visions, Needs And Challenges of BellTown?!" From My perspective(s) As A Community resident Are very different, From The Visions On paper, Surrealistic! Realistically, BellTown is very eclectic, Visually & Motionally - Air - Water - Automotives & Walker IT Reflects Life & Lively. However, With All The new Structures being built, I Think This areas Challenges Will become To intoxicating. During The day I see many Job hunters, Evenings its Job hunting both groups Are drowning! Needy & Meeting

☑ Yes! Please add me to the VISION 2040 mailing list.

NAME NAASIRA ADEEBA

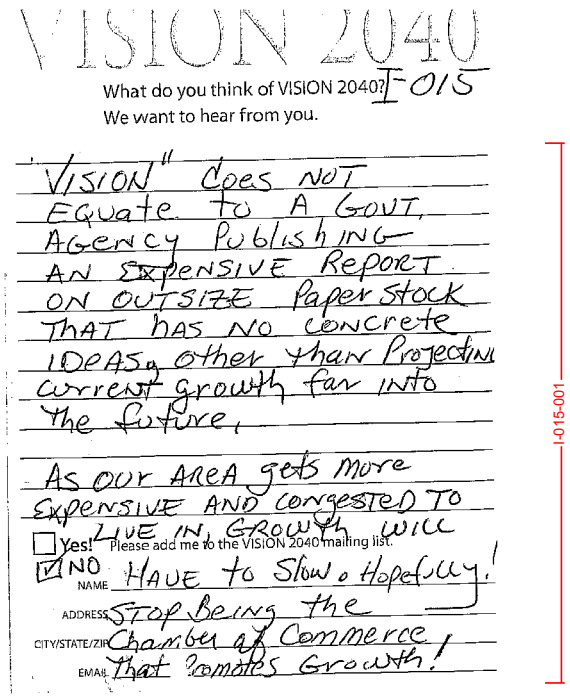
ADDRESS 2215 - 1st Av. #1307

CITY/STATE/ZIP SEA. WA. 98121

EMAIL

I-065-001

I-065-001 VISION 2040 supports compact communities, from smaller nodes to higher density urban neighborhoods, like Belltown.



VISION 2040

What do you think of VISION 2040? I-015

We want to hear from you.

"VISION" Does NOT Equate to A GOVT, AGENCY Publishing AN EXPENSIVE Report ON OUTSIZE Paper Stock THAT HAS NO concrete IDEAS other than Projecting current growth far into the future.

AS OUR AREA gets more EXPENSIVE AND congested TO LIVE IN, GROWTH will HAVE to Slow. Hopefully!

☐ Yes! Please add me to the VISION 2040 mailing list.

☑ NO

NAME

ADDRESS Stop Being the

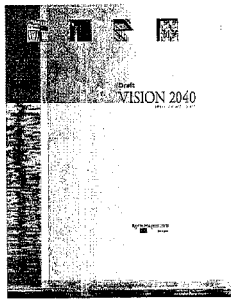
CITY/STATE/ZIP Chamber of Commerce

EMAIL that promotes Growth!

I-015-001

I-015-001 Do not concur.

I-025



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NAME _____

ORGANIZATION _____

ADDRESS _____

CITY _____ STATE _____ ZIP _____

E-MAIL _____ ☐ CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.

Comment Letter

COMMENTS:

What market forces can we encourage or recommend that will help the regional growth strategy be successful. This strategy is not too different from the 2005 version. While has the majority of residential and job growth occurred? Has it been in alignment with the strategy. I think not.

How will this plan be different in encouraging growth where we most want it to occur.

I-025-001

I-025-002

PLEASE ADDRESS COMMENTS TO:

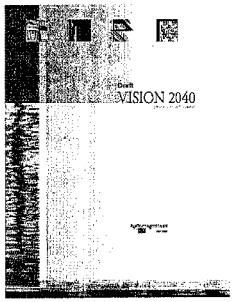
Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

Response to Comment Letter

I-025-001 See the "Places" subsection in the Economy section of Part III: Multicounty Planning Policies. See also the Issue Paper on Economics.

I-025-002 The VISION 2040 analysis includes an extensive analysis of trends. See Part II: Regional Growth Strategy for clarification and added information. Also see the VISION 2040 technical paper titled, "Regional Growth Strategy Background."

I-026



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NAME _____

ORGANIZATION _____

ADDRESS _____

CITY _____ STATE _____ ZIP _____

E-MAIL _____ ☐ CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.

COMMENTS:

Rural landowners feel they are paying a price for the lack of rural development and resource production paid to rural areas. They represent opposition to the plan. What have you done or will you do to at least acknowledge the impact on them.

In general, people living in small communities and remote areas often feel that the urban areas don't pay a price for all they get but do impose their will on the rural folks, i.e., the urban folks get open space / resource protection for free.

In urban areas, the costs of these policies usually become public costs. They transfer from individuals to government. In rural areas, the costs is borne by individuals.

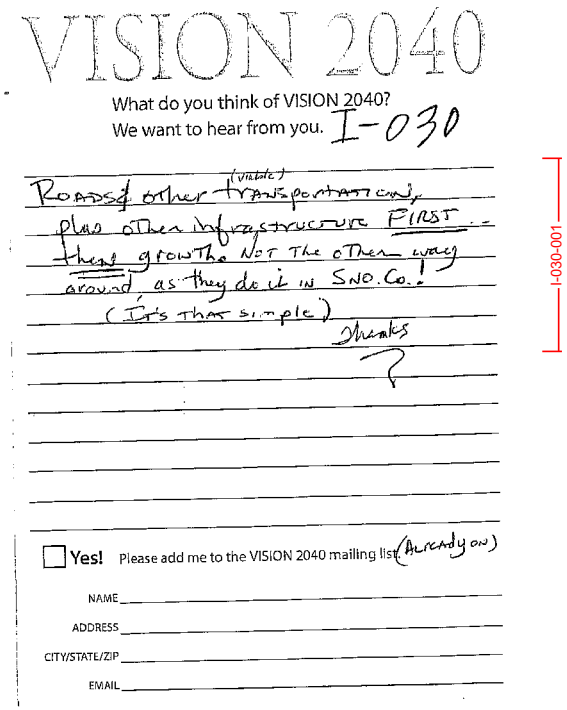
I think the folks in the rural areas would like to be recognized & acknowledged.

I-026-001

PLEASE ADDRESS COMMENTS TO:

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

I-026-001 VISION 2040 has been revised to reference the state Growth Management Act goal on property rights. The use of both urban and rural lands are controlled by planning, zoning, and development regulations.



VISION 2040

What do you think of VISION 2040?
We want to hear from you. I-030

Roads & other (visible) transportation only, plus other infrastructure FIRST - then growth NOT the other way around as they do it in Sno. Co.!
(It's that simple.)
Thanks
?

I-030-001

☐ Yes! Please add me to the VISION 2040 mailing list (Already on)

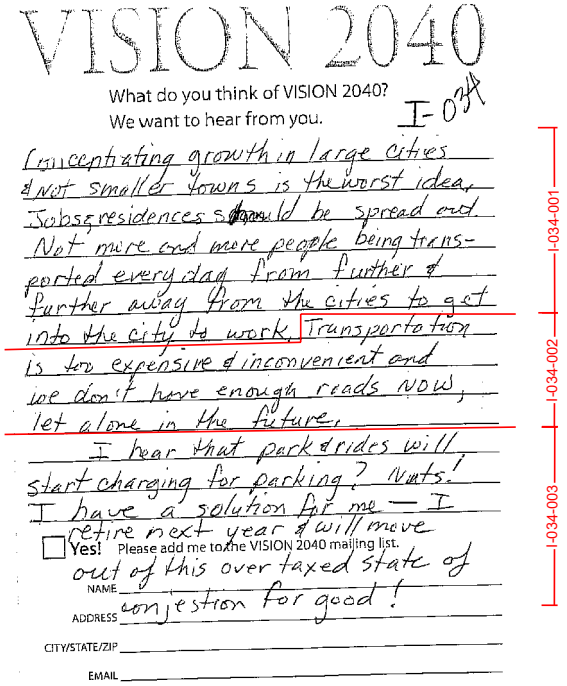
NAME _____

ADDRESS _____

CITY/STATE/ZIP _____

EMAIL _____

I-030-001 Comment noted. See the new transportation policy (MPP-T-24) that addresses increasing modes of travel that are alternatives to driving alone.



VISION 2040

What do you think of VISION 2040?
We want to hear from you.

I-034

Concentrating growth in large cities & not smaller towns is the worst idea. Jobs & residences should be spread out. Not more and more people being transported every day from further & further away from the cities to get into the city to work. Transportation is too expensive & inconvenient and we don't have enough roads NOW, let alone in the future.

I hear that park & rides will start charging for parking? Nuts! I have a solution for me — I retire next year & will move out of this over taxed state of congestion for good!

☐ Yes! Please add me to the VISION 2040 mailing list.

NAME

ADDRESS

CITY/STATE/ZIP

EMAIL

I-034-001

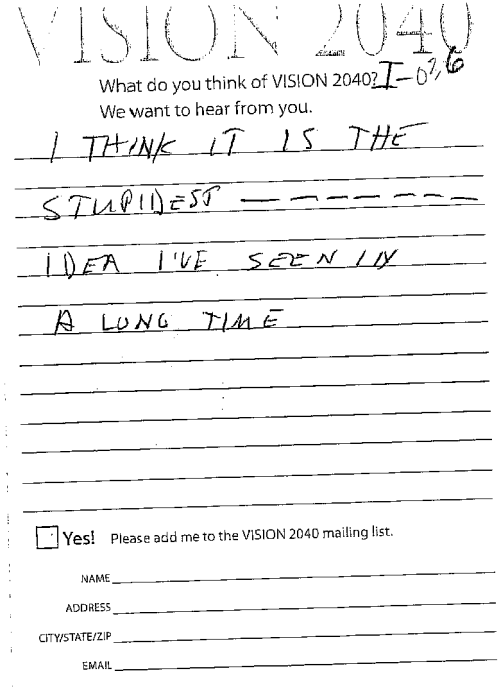
I-034-002

I-034-003

I-034-001 Comment is contrary to the state Growth Management Act and VISION 2040. Do not concur.

I-034-002 Comment noted.

I-034-003 Comment noted.



VISION 2040

What do you think of VISION 2040? I-036

We want to hear from you.

I THINK IT IS THE STUPIDEST IDEA I'VE SEEN IN A LONG TIME

☐ Yes! Please add me to the VISION 2040 mailing list.

NAME

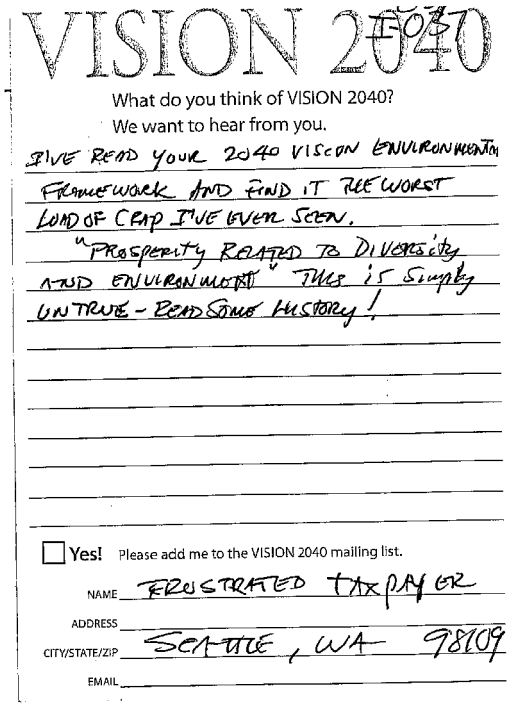
ADDRESS

CITY/STATE/ZIP

EMAIL

I-036-001

I-036-001 Comment noted.



VISION 2040

What do you think of VISION 2040?
We want to hear from you.

I'VE READ YOUR 2040 VISION ENVIRONMENTAL FRAMEWORK AND FIND IT THE WORST LOAD OF CRAP I'VE EVER SEEN.

"PROSPERITY RELATED TO DIVERSITY AND ENVIRONMENT" THIS IS SIMPLY UNTRUE - READ SOME HISTORY!

☐ Yes! Please add me to the VISION 2040 mailing list.

NAME FRUSTRATED TAXPAYER

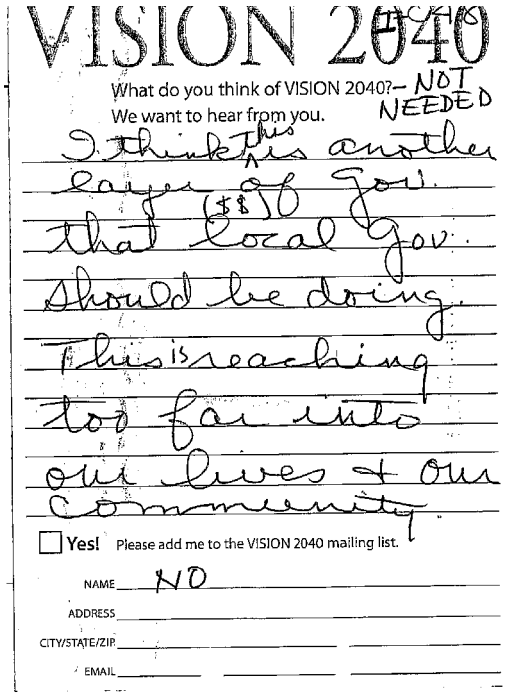
ADDRESS

CITY/STATE/ZIP SEATTLE, WA 98109

EMAIL

I-037-001

I-037-001 Comment noted.



VISION 2040

What do you think of VISION 2040? – NOT NEEDED
We want to hear from you.

I think this is another layer of gov. ($$) that local gov. should be doing. This is reaching too far into our lives & our community.

☐ Yes! Please add me to the VISION 2040 mailing list.

NAME NO

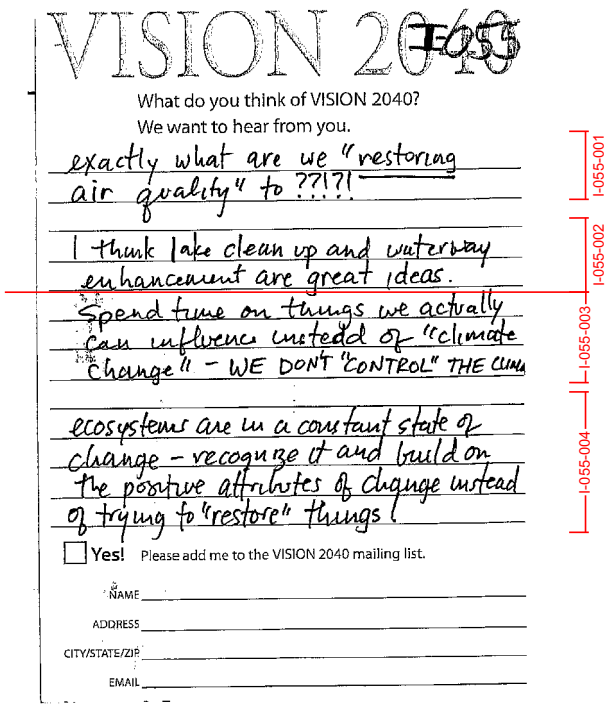
ADDRESS

CITY/STATE/ZIP

EMAIL

I-048-001

I-048-001 Comment noted.



VISION 2040 I-055

What do you think of VISION 2040?
We want to hear from you.

exactly what are we "restoring air quality" to ??!?!

I-055-001

I think lake clean up and waterway enhancement are great ideas.

I-055-002

Spend time on things we actually can influence instead of "climate change" - WE DON'T "CONTROL" THE CLIM

I-055-003

ecosystems are in a constant state of change - recognize it and build on the positive attributes of change instead of trying to "restore" things!

I-055-004

☐ Yes! Please add me to the VISION 2040 mailing list.

NAME _____

ADDRESS _____

CITY/STATE/ZIP _____

EMAIL _____

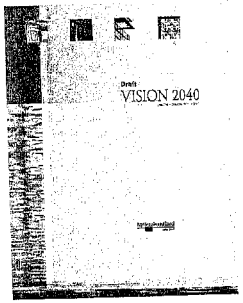
I-055-001 VISION 2040 has been revised to explain what is meant by "restore."

I-055-002 Thank you.

I-055-003 Comment noted.

I-055-004 VISION 2040 has addressed this issue, recognizing that change will happen and seeking to avoid the negative impacts.

I-053



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NAME _____

ORGANIZATION _____

Nona Eschbach
8247 Overlake DR W
Medina WA 98039

ADDRESS _____

CITY _____ STATE _____ ZIP _____

E-MAIL _____ ☐ CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.

8-15-07

COMMENTS:

Ah.. how to plan 33 years in the future?! I like the 4 county approach.. I like the map with the green & red dots I can see we must build a new Interstate on the far East side to get "thru" traffic entirely out of Greater Seattle & Bellevue.. other big cities have built "Belt lines" around their core & finally have built Belt lines around their Belt lines like an ever expanding fat man's waist. Our region can't do that because of our "corridor" site.

As our sweet pocket of Planet Earth becomes more & more popular with diverse populations we will suffer. High housing costs allow only the affluent High taxes discourage commerce.. We will essentially become a high class "resort" of high end shoppers.. dot com business & play grounds with golf - sailing - skiing - stadium stuff & art. Not exactly democratic.. but maybe we're looking for Utopia! And maybe in 33 years we will have found it.

Good luck to you all.

N E

FROM:

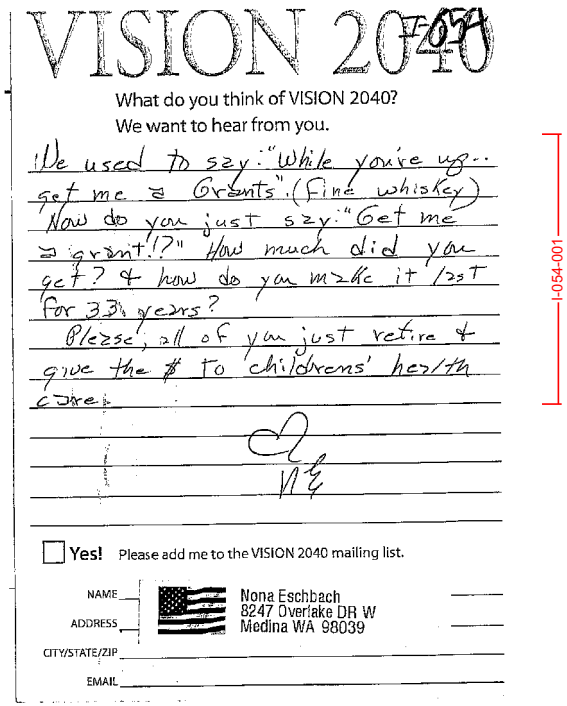
TO:

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

I-053-001 Thank you.

I-053-002 Comment noted.

I-053-003 Comment noted.



VISION 2040 I-054

What do you think of VISION 2040?
We want to hear from you.

We used to say: "While you're up.. get me a Grants" (fine whiskey) Now do you just say: "Get me a grant!?" How much did you get? & how do you make it last for 33 years?

Please, all of you just retire & give the $ to childrens' health care.

ME

I-054-001

☐ Yes! Please add me to the VISION 2040 mailing list.

NAME Nona Eschbach
ADDRESS 8247 Overlake DR W
CITY/STATE/ZIP Medina WA 98039
EMAIL

I-054-001 Comment noted.

I-002

VISION 2040

What do you think of VISION 2040?
We want to hear from you.

I-90 Westbound from Eastgate is extremely congested most evenings between 5 + 7 Any solution in sight? The east bound lanes just buzz right along with access to the car pool lanes.

Any chance of a mass transit or car pool lane, going west in the AM, also?

I-002-001

☐ Yes! Please add me to the VISION 2040 mailing list.

NAME P. Kaald
ADDRESS 16716-SE 44th
CITY/STATE/ZIP Issaquah Wa 98027
EMAIL

I-002-001 Issue best addressed at the local jurisdiction level. Also, the HOV system will be considered during the Destination 2030 update.

I-062

Robin McClelland

From: WoodinUToo@aol.com
Posted At: Monday, October 01, 2007 8:39 PM
Conversation: COMMENT ON DRAFT VISION 2040
Posted To: Vision 2040
Subject: COMMENT ON DRAFT VISION 2040

Mr. Norm Abbott:

I read with much interest the recent article in the Woodinville Weekly regarding the PSRC's plan and it classifying Woodinville as a "large city" in VISION 2040. I believe it was just the kind of wake-up call some of the citizens of Woodinville and the City Council need to point out that Woodinville cannot continue to turn a blind eye to the impending growth in our area and the role Woodinville must play, by virtue of its being an incorporated city, in accommodating that growth.

As you are probably aware, Woodinville has been resistant to increasing housing density in the largest section of its residential district. In short, the City insists that one house per acre is appropriate for a city of its size. By maintaining R-1 zoning in so large an area, Woodinville will simply not be able meet its growth requirements. Various citizens and groups have bombarded the City Council with hours and hours of anti-growth testimony, bullying the Council into ignoring the City's obligation to the GMA. Rather than meet the challenge of growth management head on with decisive leadership, the City Council has elected to take no action toward an inevitable future. Houses in the subject residential area – some of which are simply the typical split level designs of the 1970s – start at over $500,000, well above what most families in the Puget Sound area can afford and more than what those houses would sell for in, say, south King County. In addition, the taxes on these over-sized properties have increased to become a financial burden, especially for those of us who are in or nearing our retirement years.

I-062-001

I have to agree, however, with one of the reasons expressed by the anti-change citizens and City Council for resisting growth: lack of infrastructure, namely adequate street capacity. I believe it is unfortunate that the City has not leveraged its authority by gaining assistance from developers who could help fund traffic improvements by working with, not against, the growth management requirements of Woodinville. I also believe that the City should appeal to King and Snohomish counties and to the PSRC for assistance in mitigating the impacts that increased population density (both within the City and in immediately surrounding areas) will have on Woodinville's roads. Surely all parties concerned – developers, the City, Counties and State – can work together to insure that all aspects of growth – including increased traffic – are well managed.

I-062-002

I believe sound growth management – right NOW – and not unreasonable insistence on maintaining the status quo, is needed for Woodinville to evolve into a vital and viable community by the year 2040. It will take all those years of planning in order to insure that the City will offer a desirable as well as affordable quality of life for its increased population.

Continuation of I-062-001

Thank you for your consideration,

Patricia Baird
15638 NE 202nd St
Woodinville, WA 98072

See what's new at AOL.com and Make AOL Your Homepage.

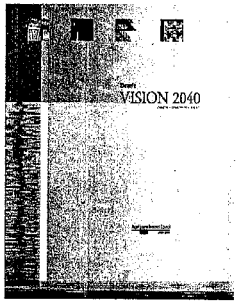
10/2/2007

I-062-001 Comment noted. Part II: The Regional Growth Strategy provides regional guidance for all local governments to use as they update their comprehensive plans. This is meant to build on local plans and provide guidance for the type of "sound growth management" that you suggest.

I-062-002 VISION 2040 has addressed this issue. Actions call for, among other things, investigating existing and new sources of funding for transportation facilities and services, and reporting to state agencies and the Legislature to ensure that investments in facilities and services advance the regional vision. See also Transportation multicounty policy policies.

I-062-001 (continued) See response to previous I-062-001.

1-090



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CONTACT INFORMATION:

At a minimum, please provide your name, the county in which you live, and ZIP Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

NAME PATTI WEBBER

ORGANIZATION

ADDRESS 5931 WATAUGA BEACH DR. E.

CITY PORT ORCHARD STATE WA ZIP 98366

E-MAIL ☑ CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.

Comment Letter

COMMENTS:

It is bad enough what is being railroaded by ELECTED officials who the heck is PSRC, & who gave them any authority to make decisions for me?!

Who funds this group? If I am responsible enough to earn a living & make property purchases, I can make decisions on how I want to live my life w/o the assistance of some self proputating watch dog group.

I-090-001

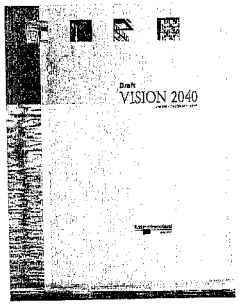
PLEASE ADDRESS COMMENTS TO:

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

Response to Comment Letter

I-090-001 PSRC is authorized under federal and state statutes, as well as under its interlocal agreement with its members. Federal and state grants pay the bulk of PSRC's operating expenses along with dues from local governments. PSRC is a member organization made up of the four counties (King, Kitsap, Pierce, and Snohomish) and the cities in those counties.

I-049
8/16/07



Draft VISION 2040

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NAME PETER GAHN Kitsap 98311

ORGANIZATION _____

ADDRESS 8018 Illahee Rd

CITY Bremerton STATE WA ZIP 98311

E-MAIL _____ ☐ CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.

MR ABBOTT: 8/10/07

COMMENTS:

I ATTENDED YOUR PUBLIC MEETING IN BREMERTON AND HAVE THE FOLLOWING CONCERNS:

1) WE HAVE COUNTY AND CITY REPRESENTATION ON THE REGIONAL BOARD BUT WHEN ISSUES RISE TO THE 'FINAL' DECISION WE KNOW THAT THE LARGE COUNTIES (King etc.) WILL HAVE THE FINAL SAY. THIS IS NOT ACCEPTABLE OR THE BEST FOR Kitsap Cnty.

QUESTION - WHY DOES KITSAP HAVE TO BE INCLUDED WITH KING, PIERCE AND SNOHOMISH? IT IS MORE LOGICAL IF KITSAP WAS COMBINED WITH MASON, JEFFERSON ?? WHY NOT?

2) TRANSPORTATION ISSUES - BIG PROBLEMS ESPECIALLY IN SEATTLE & TACOMA AREAS BUT NOT IN KITSAP (EXCEPT FOR THE STUPID TUNNEL IN BREMERTON). SURE, WE MUST TRAVEL TO/FROM SEATTLE & TACOMA BUT WE HAVE BEEN DOING IT FOR MANY, MANY YEARS AND WILL FIGURE OUT HOW TO DO IT IN THE FUTURE.

FROM:

THANKS AGAIN FOR THE MEETING - GOOD QUESTIONS & GOOD ANSWERS BUT I SUGGEST YOU TARGET 2020 INSTEAD OF 2040 - THE PROJECTIONS WOULD BE MORE REALISTIC AND THE PROBLEMS EASIER TO IDENTIFY AND RESOLVE.

TO: Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

RESPECTFULLY.
PETER GRAHN

(360) 308-9706

I-049-001

I-049-001 Comment noted. Note that Kitsap County has been a member of PSRC, and its predecessor agencies, since the 1950s.

I-049-002

I-049-002 Comment noted.

I-049-003

I-049-003 VISION 2020 provides regional guidance out to the year 2040. Local comprehensive plans provide more specific policy direction over a 20-year planning horizon.

Comment Letter

Robin McClelland

From: Richard Berndt [richard_berndt@mac.com]
Posted At: Friday, September 07, 2007 4:55 PM
Conversation: VISION 2040 Comments
Posted To: Vision 2040
Subject: VISION 2040 Comments

I-151

Norman Abbott, SEPA Responsible Official
Puget Sound Regional Council
1011 Western Ave, Suite 500
Seattle WA 98104-1035

Dear ~~Mr. Abbott~~ *Norm*:

Congratulations on your draft update of VISION 2040! This is a comprehensive, integrated, innovative growth strategy, and a big step forward from VISION 2020. The goals and policies are well-thought out. My main concern is how they become a reality. Some quick suggestions to help make some of these goals and policies happen: I-151-001

1) The VISION 2040 draft strategy of concentrating growth in metropolitan centers and core cities makes a lot of sense. It will help with our efforts against global warming, to increase exercise and health benefits, to reduce the growth of energy consumption, preserve watersheds, forests and other areas outside the Urban Growth Area, reduce the growth of transportation costs, and promote revitalization of economically distressed areas (instead of abandonment). I-151-002

However, as a February 23, 2006 Seattle Times analysis on local air quality states that "The neighborhoods in the Puget Sound area with the unhealthiest air cluster around ports and follow major transportation routes," and that the risks from cancer from air pollution are highest in these areas. If we want more growth in these areas, we need to reduce pollution dramatically in these areas. Growth and reduced air pollution won't both happen without dramatically improved clean technology. The VISION Environment Goals and Policies are impressive in addressing this and other environmental issues. My concern, again, is how these goals become reality. Some possible solutions include taxing vehicles according to pollution emitted, as well as mandating that public vehicles and buildings, such as in motor pools and mass transit, have strict standards for emissions and energy usage. This would also present the opportunity to grow the region's clean technology cluster, a key aim of the Prosperity Partnership. I-151-003

2) To effectively realize Policy MPP-EC-12, it is important to monitor subareas annually for their economic health. This is important not only to identify economically distressed areas, but also to identify areas in danger of becoming distressed and taking preventative action, as well as seeing if economic efforts in distressed areas are effective. Monitoring could include such indicators as unemployment rate, length of unemployment, income, type of jobs, crime, dropout rates, etc. I-151-004

3) Colleges should have incentives on how well they are producing students to fill openings in high-demand, target sectors. Currently, colleges are often not reimbursed additional money for students in high-demand programs, even though the cost per student is often higher.

It's also important to better identify career ladders and pathways, so that people can easily transition I-151-005

(Comment continues on following page)
9/10/2007

Response to Comment Letter

I-151-001 Comment noted.

I-151-002 Comment noted.

I-151-003 The Destination 2030 update will provide an additional opportunity to address this issue. VISION 2040 policy MPP-T-33 provides regional guidance on the issue.

I-151-004 VISION 2040 has been revised to address this issue. See MPP-G-3 and G-Action 2.

I-151-005 VISION 2040 has addressed this issue. See economic section narratives and "invest in people" policies.

from one occupation to another with little or no training. This is critical, both to provide workers opportunities in a shifting global economy, and to help local businesses find the skilled workers they need to maintain and grow their company. It would also be useful to build upon the Workforce Development Council Snohomish County's career tree work.

Continuation of I-151-005

4) It's important that jurisdictions share information so they aren't reinventing the wheel. There's been an increasing trend towards jurisdictions collaborating, as well as PSRC best practices projects such at the *Development Toolkit* report. To effectively implement VISION 2040, these types of projects need to be the norm. Besides having specific projects and reports, it would be useful to have periodic regional forums on a variety of issues, such as economic vitality, downtown design, transportation, and the like. Representatives from jurisdictions could present and critique current and future projects and learn from others' experiences. The PSRC could hire consultants who work within the region to present on these subjects as well, and invite those from business, labor and nonprofits to learn from their experiences.

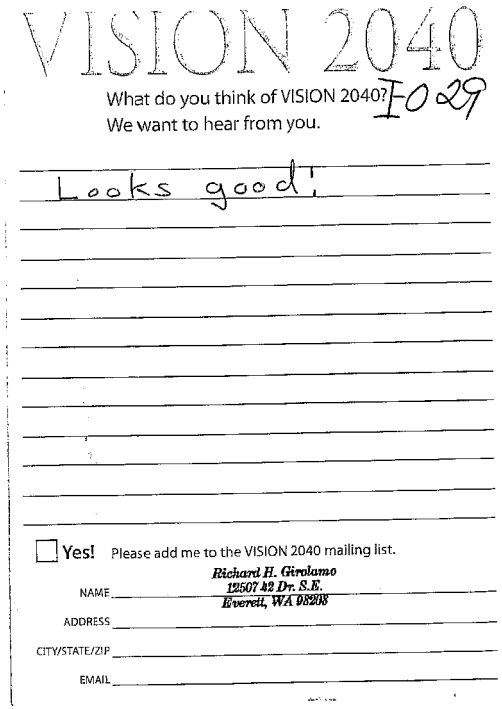
I-151-006

Again, congratulations on the strategy.

Richard Berndt
2013 Nob Hill Ave N
Seattle, WA 98109
richard_berndt@mac.com
206.930.1971

9/10/2007

I-151-006 While VISION 2040 calls for many actions that promote collaboration and best practices, the idea of periodic regional forums was not included. Note, however, that as part of other, more specific programmatic actions, events such as these will occur.



VISION 2040

What do you think of VISION 2040? I-029
We want to hear from you.

Looks good!

☐ Yes! Please add me to the VISION 2040 mailing list.

NAME Richard H. Girolamo
ADDRESS 12507 42 Dr. S.E.
CITY/STATE/ZIP Everett, WA 98208
EMAIL

I-029-001

I-029-001 Thank you.

I-101

September 4, 2007

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

Dear Mr. Abbott:

The Puget Sound Regional Council has asked for comments on their Draft Vision 2040 document. As you know, I have testified in several of your public meetings. Let me take this opportunity to put some of these comments into writing for your consideration.

Comment 1: Vision 2040 lacks legal authority: There does not appear to be any statutory or constitutional authority for the Puget Sound Regional Council (PSRC), with the possible exception of transportation planning and the distribution of federal transportation funds.

Indeed, the PSRC appears to be a self-perpetuating new layer of non-elected regional government that is appropriating land use and other planning functions that legitimately fall under the purview of county and city governments and their elected officials. In other areas, such as environmental protection, PSRC appears to be assuming responsibility for activities that are under the legal jurisdiction of state agencies such as the Department of Ecology and the Department of Fish and Wildlife.

This quasi-governmental status of PSRC allows it to wield considerable clout to force counties to implement its vision through its ability to control grant monies -- but this status insulates it from accountability to the voters, who are unable to challenge PSRC policies at the ballot box. This deviation from the American democratic process is unhealthy, unwise and unacceptable.

Recommendation: The entire Vision 2040 lacks statutory or constitutional basis and should be rejected out of hand by responsible citizens and local governments.

Recommendation: The various local governments involved in the PSRC need to take action to strictly limit the role of PSRC to activities that are not already the established responsibility of existing state and local government.

Comment 2: Vision 2040 is based on a Wrong Philosophy: The 20th Century witnessed one of the greatest political debates in history. The issue was whether capitalism or socialism would prove to be the best option for citizens of the world. Even as late as the 1950s there were concerns in some quarters that Soviet Premier Khrushchev might be right when he said "we will bury you". But the debate is over. The winner was decisive. No serious thinker today even questions that free market economics has "buried" government central-planned economics.

It turns out that government planners could not even come close to anticipating the needs of a complex economy, whereas this was easily accomplished by a network of uncounted millions of profit-motivated organizations and individuals, operating with minimal government interference.

(Comment continues on following page)

I-101-001
I-101-002
Continuation of I-101-001
I-101-003

I-101-001 PSRC is authorized under federal and state statutes, as well as under its interlocal agreement with its members.

I-101-002 VISION 2040 is not intended to take responsibility for state agencies' work. Do not concur.

I-101-001 (continued) See response to previous I-101-001.

I-101-003 Comment noted.

Yet, the feeling that "government can do it better" amazingly lives on in organizations like PSRC. Rather than let the "market", consisting of the needs and desires of individual people, drive the solution to regional planning; PSRC believes that government "social engineering" should make the decisions for us.

To show just how badly this operates in practice, take a look at transportation. The government planners believe the solution is to shift people out of their automobiles into public transportation, and they are committing over half the long-term transportation budget to support public transportation projects. This has been government's thrust for some time, with almost no new roads built over the last 30 years. Yet the public wants their cars – to the point that public system ridership is only 3% of all trips, down from 6% twenty years ago. The market wants roads and the government provides light rail – despite the fact that studies such as the Reason Foundation's report show that mass transit works only where population density exceeds about 10,000 people per square mile. Our region doesn't qualify.

Another area where government and the average citizen aren't on the same page is housing density and location. Polls, both in the United States and worldwide, consistently show that most people prefer to live in single-family homes on their own land. From the late 1800s to about 1970 letting the homebuyer select what they wanted worked well for everyone. But more recently, government has decided the average person in a free market won't make good decisions, and, in documents such as Vision 2040, decrees that people should live in high-density urban centers, whether they prefer it or not. This is simply wrong. In a free society people should be able to choose the density and type of dwelling they prefer. (As part of my comments I have attached an article I wrote on "Sprawl" which was published in the Kitsap Sun.)

And, somehow, the government doesn't seem to understand that study after study shows that the cost of housing is almost directly proportional to the amount of regulations that control it. If "affordable" housing is the goal, government should dramatically slash the controls, not continue to propose new ones as in Vision 2040. (An analogy is the fact that several administrations showed that cutting the tax rate dramatically stimulates the economy, increasing overall tax revenues).

Disingenuously, the spokespeople for Vision 2040 say that their plan "increases" choice when exactly the opposite is true.

Recommendation: Junk the "social engineering" of Vision 2040 and replace it with a market driven set of objectives (i.e. roads vs. light rail, "sprawl" vs. urban centers, etc.)

Comment 3; Absence of Stakeholders. An informal survey of PSRC members and the people and organization participating in PSRC planning shows that almost all are those who will benefit from more government controls. There will be more employees, more managers and more executive positions. And there will be more power to exercise. A heady proposition – and highly biased.

Continuation of I-101-003

I-101-004

I-101-004 Comment noted.

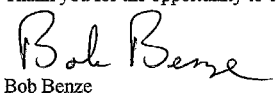
Where are the stakeholders that represent a more conservative vision? For example, why wasn't the Washington Policy Center invited to give presentations at regular PSRC planning meetings during development of Vision 2040? This is a highly credible and well-respected organization with much to contribute. Or why not hear from a representative from the Citizens' Alliance for Property Rights to get a contrasting point of view?

Indeed, you could have heard from any number of other organizations that represent other points of view. But you chose not to. The result is that you developed Vision 2040 in a bubble with people with mutually reinforcing agendas. If the ideas in Vision 2040 were valid, they would have withstood a constructive debate. But, because there are basic flaws in the underlying concepts, no debate was invited and only variations on one point of view are presented for action. This, again, is simply wrong. An analogy is the need to subject scientific studies to rigorous peer review before they are considered acceptable for publication.

Recommendation: The entire Vision 2040 document should be put on hold until legitimate "conservative" alternative "visions" are developed, presented, evaluated and published.

There are numerous technical errors and contradictions in the document. I will leave these to others to enumerate – preferring, instead, to comment on first principles.

Thank you for the opportunity to comment.



Bob Benze
11055 Mt. Vista Circle NW
Silverdale, WA 98383
(360) 692-0800
robert@benze.com

cc: Kitsap County Commissioner Jan Angel
35th Legislative District Senator Tim Sheldon

I-101-005

I-101-005 The VISION process included extensive opportunity for public participation.

Kitsap Sun Sunday, July 15, 2007

BOB BENZE | GUEST COLUMN

Sprawl: the Good, the Bad and the Ugly

'Sprawl' is a word that elicits strong and almost always negative responses.

In this state, as in many others, people who opposed sprawl banded together in a Smart Growth movement which, in the early 1990s, successfully advocated growth management legislation to contain most of the population growth within well-defined "urban" areas, so that the "rural" areas could be preserved.

But sprawl is a misunderstood topic. Robert Bruegmann gives an intriguing new perspective in his "Compact History of SPRAWL."

Sprawl is not new in history, and there is overwhelming evidence that, over time, it has actually been quite beneficial to a large part of the population. Inherently, all people want the right to privacy, mobility, and choice. And in past decades, as cities approached economic maturity, average working people became affluent enough to have some power to pursue their own self-interest. With their new freedom of choice, they left the crowded city tenements behind and fled to the suburbs for a better life.

In large cities throughout the developed world, this decentralization was well underway by the end of the 1800s. By the end of the 1920s the move to the suburbs resulted in almost half of all American families owning their own homes. This should not be a surprise. Polls, both in the United States and worldwide, consistently show that most people prefer to live in single-family homes on their own land.

But the state's Growth Management Act takes away many of the choices that individual people had found so fulfilling – allegedly for the collective common good of society. Thus, it is fair to ask whether society is actually benefited or is it harmed by such legislation?

It is important to understand that anti-sprawl activism was not a grass roots movement of ordinary citizens who wanted to improve their lives. Quite the contrary. Mr. Bruegmann notes that the leaders of the Smart Growth anti-sprawl movement "come overwhelmingly from an elite group of academics, central-city business leaders, and employees of not-for-profit organizations." These are people who advocate "sustainable" growth and tend to have a pessimistic "zero-sum" view of the world that assumes we won't discover new resources or develop new technologies to benefit society and the environment. They tend to prefer top-down social engineering over individual choice – often assuming that average people won't make good choices on their own.

But they are usually wrong. Bruegmann says that some people who study such things

Note: This page of comments does not require a response.

now believe it is possible that today's low-density sprawl may be more sustainable than the urban-growth alternative.

Much of the environmental protection rhetoric is overblown. Despite a lot of scare tactics by the sustainable-growth crowd, the reality is that most indicators of pollution are down dramatically. In the 1960s, air and water pollution posed real problems. Today, nearly all the goals of the Clean Water Act and the Clean Air Act have been achieved. The air is breathable and water quality is remarkably improved.

So, who actually benefits from these land-use restrictions?

The fact is that Smart Growth is fundamentally about the use of the political system by existing property owners — who have the homes and amenities they want — to impose controls to prevent change. Their motive is really to preserve "aesthetic" values, i.e. the look and character of the land as it was when these "incumbents" bought or built on it.

Smart Growth increases the value of their properties. These are the winners.

The losers are newcomers and the less-affluent people who are often forced to rent because they can't afford to buy. And they are the first-time homebuyers who are forced to live in a distant "affordable" location with a long commute to their job.

The losers also are those people on the wrong side of the urban/rural line who lose the value of their land because it is preserved from development. Unlike Sweden and Britain, where the land, or at least the development rights, were purchased by the government to preserve open spaces, Smart Growth allows people to gain the aesthetic benefits of open space through government regulations, without having to pay the owners for it themselves.

People who are forced into denser urban cities may also be losers.

Many people are questioning whether such increased density will add or detract from the quality of their lives.

And Smart Growth isn't really about preserving the land. For example, in Oregon where Smart Growth urban boundaries were first established, the cities and urban areas never occupied more than 3 percent of the total area. In the entire country, no more than 5 percent of the land is developed. That's a lot of open space for people who want to enjoy nature.

It also isn't really about farmland. Both in the U.S. and worldwide, it is primarily the increasing agricultural yields that are causing farmland to be taken out of production, not developers.

So, maybe a little sprawl isn't such a bad thing after all. You decide.

Bob Benze is a retired engineer living in Silverdale.

Note: This page of comments does not require a response.

Robin McClelland

I-171

From: Norman Abbott
Sent: Wednesday, September 12, 2007 8:19 AM
To: Robin McClelland
Subject: FW: Letter from Pujget Sound Regional Design Team

From: ROBERT CORNISH [mailto:bcornish@verizon.net]
Sent: Tuesday, September 11, 2007 5:06 PM
To: Norman Abbott
Subject: Letter from Pujget Sound Regional Design Team

Norman,
The deadline was Friday for additions to the letter, but it is summer and personal schedules are not always so firm. But on the chance that you may want to consider my addition, here it is.

On page one, under the Top Three Issues, please consider a fourth.

In the 1960s I spent over 4 years as the principal planner with ABAG and have witnessed the necessity of strong political support for regional planning. This leads me to urge additional emphasis by PSRC on implementation through governmental structures, in this case the state government.

Please consider : *There is a critical need for a regional leader of substantive political stature to direct a regional design program in collaboration with state, county and local governments for an enhanced role for PSRC in regional design of the built environment.*

I-171-001

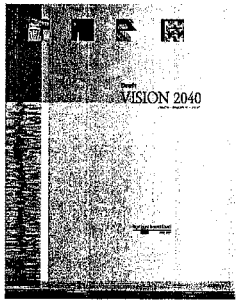
Thanks, Norman, for considering the addendum.

Best regards,

Bob Cornish, FAICP

I-171-001 Comment noted.

1-069



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CONTACT INFORMATION:

At a minimum, please provide your name, the county in (KITSAP) which you live, and ZIP Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

NAME ROBERT ROSSWORN

ORGANIZATION

ADDRESS 5945 WATAUGA BCH. DR. E.

CITY PORT ORCHARD STATE WA. ZIP 98366

E-MAIL ☑ CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.

COMMENTS:

I am in total disagreement with Kitsap County being a part of PSRC. Another example of non-elected officials running roughshod over the public. Kitsap County is a rural area and should not be governed to the same restrictions as King, Snohomish & Pierce Counties.

I-069-001

PLEASE ADDRESS COMMENTS TO:

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

I-069-001 Comment noted. Note that Kitsap County has been a member of PSRC, and its predecessor agencies, since the 1950s. The Regional Council is comprised of local elected officials from the four counties and their cities working together on common issues. All four of the counties have both rural areas and urban lands.

I-163

September 7, 2007

Mr. Norman Abbott
PSRC
1011 Western Avenue
Suite 500
Seattle, WA 98101

Dear PSRS Policy Board Members, Staff Committee Members and Staff:

The following brief observations are in addition to the letter sent to you from the Regional Design Team on September 7th, 2007. I served on the Steering Committee of the Regional Design Team during the preparation of the Regional Design Strategy (RDS).

I found that the underlying significance of the RDS was in three policy areas These policy areas are in addition to the traditional role of PSRC: that is to influence and guide the form of regional growth and development. Those areas are focused on the *design coherence* and *structure* of

- The elements, both natural and built that *connect* regional development: stream valleys, lakes and ridges, land use and transportation corridors. The armature and sinews that underlie regional form.
- The places and spaces *between* the developed communities: that articulate the differences and character of regional centers and land use patterns. The articulations, generally associated with natural elements, create the edges and opportunities to create distinctive places and sustain the icon elements of the region..
- Communities and development within the Region. Is there a role for the PSRC in providing guidance and information for local jurisdictions to accomplish their development in designs that further notions of community character and identity without compromising the separation of local control and regional policy?

I-163-001
I-163-002
I-163-003

These three areas that focus on design coherence and Regional Identity are particularly important in the special setting and history of Puget Sound that constrains the region to be "loosely connected". It is, therefore, a critical step forward, in the maturation of the PSRC, to implement the design policies and suggestions proposed in the Regional Design Strategy.

Sincerely,

Ronald C. Turner AIA AICP

2515 Fourth Avenue, #2201 Seattle, WA 98121 206-441-3395 rjctur@msn.com

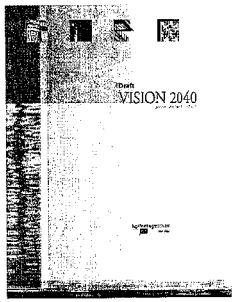
cc: Talia Henze

I-163-001 Concur.

I-163-002 Concur.

I-163-003 Concur. See DP-Action-10.

I-019



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CONTACT INFORMATION:

At a minimum, please provide your name, the county in which you live, and ZIP Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

NAME Rosemarie Ives

ORGANIZATION _____

ADDRESS _____

CITY _____ STATE _____ ZIP _____

E-MAIL _____ ☐ CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.

COMMENTS:

PSRC's has to influence WSDOT's and Sound Transit's decisions.

eg. *HOV to HOV connections - PSRC has had * in 2030 plan for five or more years. Projects in RTID don't provide incentives to reduce SOV trips.

I-019-001

PLEASE ADDRESS COMMENTS TO:

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

I-019-001 This issue will be considered when Destination 2030 is updated.

Comment Letter

9.7.2007 1/3

I-108

September 6, 2007

Puget Sound Regional Council

Re: Comments on Draft VISION 2040

Thank you for the opportunity to comment on this document. Three definitions of importance:
Insanity: Doing the same thing over and over but expecting a different result.
Effective: Doing the right thing (More important).
Efficient: Doing things right (Less important).

Too much of the draft appears to be a rehash of past policies and/or practices without many new paradigms or approaches. Thus it borders on insanity to expect a different result from this document. Also, if we are doing the wrong thing, doing it more efficiently is still doing the wrong thing. I-108-001

Besides the following specific comments, I have two general comments. First, the draft mass transit section makes no mention to the state requirement for least cost planning and therefore is biased towards rail rather than bus (BRT). The transportation policies discussion mentions efficient/efficiency several times but effective/effectively only a few times. With the cost issues facing our region it is more important that our transportation be effective than that it be efficient. (Light) Rail may be more efficient – in moving some people point-to-point – but it is not very effective, relative to BRT or the automobile, in moving large numbers of people region wide. I-108-002

Second, within all of the "fluff" wording about the need to minimize automobile travel there is no mention or recognition of the importance of the automobile to our whole economy (See Appendix.). If we truly want to begin reducing our reliance on the automobile we need to look at the total picture and discuss changing our economy away from its automobile dominant position. That is a whole different issue than just saying we must stop building more roads (and hope the resulting congestion will get people out of their automobiles. I-108-003

General comments on various elements of the draft follow. I have focused on the transportation element but there are obviously related impacts to other elements of the draft.

Page 70, Second Paragraph. "Capacity increases . . . greatest net benefit . . , growth and economic strategies." The draft speaks long and often about high capacity transit (HCT) but says nothing about the fact that the planned HCT (ST2) adds NO (emphasis added) new transit service for travel patterns not already well served by existing transit services. By Sound Transit figures ST2 will cost over $23 Billion (YOE$) to attract an additional 168,000 new riders/day. These 168,000 are approximately only 1% of the over 16 million daily ridership across Puget Sound. It would be hard to find a less effective way to spend that amount of money. I-108-004

Page 70: Sidebar on Transit Supportive Densities. There needs to be a map or maps showing the residential and job densities listed. These maps should form the basis of the transit system – both bus and rapid/mass transit – with appropriate overlays. These two densities are too important to be left with only a sidebar comment. I-108-005

Response to Comment Letter

I-108-001 VISION 2040 contains a substantial amount of new information and provides new approaches including a numeric Regional Growth Strategy, an environmental framework and environmental policies, and actions and measures.

I-108-002 VISION 2040 narrative has been revised to address the issue of bus rapid transit as an important high-capacity transit option.

I-108-003 VISION 2040 addressed this issue.

I-108-004 Comment noted.

I-108-005 Comment noted. The final VISION 2040 will include additional maps and images.

Page 71: MPP-T-23 & 24. These policies do mention if transportation investments are public or private. These policies should be expanded to specifically address the private investment to increase travel options. Rather than try to simply reduce SOV travel, why not reduce the vehicle size to fit the single occupant (i.e. Smartcar)? This effort would increase the road, and parking, capacity without the expenditure of public dollars.

Page 71: MPP-T-27. This policy speaks to the integration of transportation systems to move people/freight between modes or technologies. What about the integration within modes or technologies? Example: KC Metro emphasizes one-seat rides rather than changing the system to facilitate the use of transfers between buses. What is the difference between changing buses, changing from an SOV (at a Park N Ride) to a bus, changing from bus to light rail, or anything else for that matter? What is the passenger ferry from Bainbridge Island if not a transfer? Sidebar comment: If you want to increase the efficiency of transit, talk to the transit riders; however, if you want to increase the effectiveness of transit, talk to the non-transit riders!

> In conjunction with the above issue, east of Lake Washington the draft emphasis on transit use is and apparently will be in an East-West direction with minimal North-South movements. Conversely, west of Lake Washington the emphasis is North-South with minimal East-West movement. This is not how the residents live or work – a much more diffuse situation.

Page 71: MPP-T-28. This policy should be expanded to recognize the need to coordinate private funding – for automobiles, motorcycles, mopeds, etc. – with public funding for infrastructure – roads and public modes of transportation. There is a huge opportunity to leverage the private sector investment of some $12 million/day now spent across Puget Sound for new automobiles. This policy also needs to include recognition of costs imposed on nonusers as well as users.

The draft contains NO (emphasis added) mention of any BRT system on I-405 even though that mode is the adopted method of transit to serve the travel needs of East and Southeast King County.

There is insufficient recognition of the impact technology will most likely have on all phases of our transportation system. Where is there any discussion or even recognition of personal rapid transit (PRT) systems by the year 2040?

Vanpools are mentioned only three times, yet this mode is probably the most cost-effective single transit mode in Puget Sound. Several years ago the PSRC convened a committee (on which I served) to discuss commuter trip reduction efforts where it was stated that the vanpool program could be many times larger than it was; then the committee was summarily disbanded without comment. Go figure!

Why is there no discussion of the opportunity to incorporate school buses into the transit system? This is commonly done in other cities as well as other countries. With current technology it is a simple matter to centralize maintenance, fares, etc., and decentralize the service hours decisions.

I-108-006
I-108-007
I-108-008
I-108-009
I-108-010
I-108-011
I-108-012
I-108-013

I-108-006 VISION 2040 has been revised to address sustainable transportation.

I-108-007 Comment noted. The Destination 2030 update provides an additional opportunity to address this issue.

I-108-008 The issue of investments over Lake Washington will be considered when Destination 2030 is updated.

I-108-009 The Destination 2030 update provides an additional opportunity to address this issue.

I-108-010 VISION 2040 narrative has been revised to address the issue of bus rapid transit as an important high-capacity transit option.

I-108-011 The Destination 2030 update will provide an additional opportunity to promote this issue.

I-108-012 The issue of vanpools and other transportation demand management strategies will be considered when Destination 2030 is updated.

I-108-013 The issue of access to schools, as well as other key destinations, will be considered when Destination 2030 is updated.

The Puget Sound road map is omni-directional but the transit map (based on total quantity of service) is Seattle centric. What would an omni-directional transit map look like and what would be the cost of implementation?

There has been considerable discussion about the Puget Sound fault line across Mercer Island to Issaquah. Why is there no discussion in the draft about how this fault would likely affect the transportation system in general and the HCT system in particular?

Again, thank you for the opportunity to provide input. My hope is that the PSRC will spend some time seriously thinking about and debating the many problems facing our region and not just regurgitating what the jurisdictions across Puget Sound have provided for this draft.

Sincerely,

Rowan Hinds
1571 Sycamore Drive SE
Issaquah, WA 98027
425-392-1718
rowanhinds@worldnet.att.net

APPENDIX

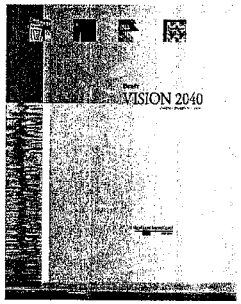
The Puget Sound is approximately 1% of the United States in population. The annual sales of automobiles in the USA are approximately 16 million units. One per cent is 160,000 units divided by 360 days equals approximately 450 new cars sold every day. The average cost of a new car is approximately $28,000 for a total daily expenditure of approximately $12 Million. The State of Washington gets approximately $1 Million/day and KC Metro and Sound Transit split approximately $100,000/day.

I-108-015 I-108-014

I-108-014 The issue of transit service and investments will be considered when Destination 2030 is updated.

I-108-015 Given the regional scale of the alternatives, and the large variation of conditions among localized areas, the level of detail for the alternatives and the environmental analysis has been conducted at a broad programmatic scale. Localized impacts of growth could vary, but would depend on more specific actions that would be considered and approved through local or project-level processes. The issues of safety and security will be considered as part of the Destination 2030 update.

I-085



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CONTACT INFORMATION:

At a minimum, please provide your name, the county in which you live, and ZIP Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

NAME RUSSELL E. SWANK

ORGANIZATION

ADDRESS 3259 SUNDE ROAD N W

CITY SILVERDALE STATE WA ZIP 98383

E-MAIL RSWANK@WAVECABLE.COM ☐ CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.

Comment Letter

COMMENTS:

CONTRARY TO THE STATED VISION 2040 ENVIRONMENT GOAL, NOTHING IN THE GMA (RCW 36.70A) REQUIRES "RESTORATION" OF ENVIRONMENT AS A PART OF GMA COMPLIANCE. GMA DOES NOT ADDRESS "GREEN HOUSE GAS EMISSIONS" OR "CLIMATE CHANGE" AS GROWTH MANAGEMENT ISSUES. NOTHING IN OUR CONSTITUTION OR GMA DELEGATES AUTHORITY FROM A COUNTY TO A "REGIONAL" BODY NOR DO THOSE LAWS PROVIDE A MECHANISM FOR ELECTED COUNTY OFFICIALS TO MAKE SUCH DELEGATION, CONTRARY TO VISION 2040 MPP-EN-2

RCW 36.07A.210(3) REQUIRES AN ANALYSIS OF FISCAL IMPACT. THERE IS NO FISCAL IMPACT ANALYSIS FOR VISION 2040.

NOTHING IN GMA REQUIRES OR AUTHORIZES THE CREATION OF "REGIONAL" BODIES FOR LEGISLATIVE PURPOSES. (SEE RCW 36.07A.210210(2))

KITSAP HAS NO LOGICAL REASON OR LEGAL REQUIREMENT TO BE PART OF PSRC. (APPROX 235,000 POPULATION) SEE RCW 36.70A.210 (7)

VISION 2040 MPP-EN-3 "ENSURE THAT ALL RESIDENTS OF THE REGION, REGARDLESS OF SOCIAL OR ECONOMIC STATUS, LIVE IN A HEALTHY ENVIRONMENT..... (HOW ALL THIS IS TO BE ACCOMPLISHED, AND THE COST AREN'T IDENTIFIED!

I-085-001
I-085-002
I-085-003
I-085-004
I-085-005
I-085-006
I-085-007

PLEASE ADDRESS COMMENTS TO:

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

Response to Comment Letter

I-085-001 This provision is within the authority of the Regional Council's mandates under state law (such as the Growth Management Act {see "The State of Washington's Growth Management Act and Related Laws - 2007 RCW Update"}, the Clean Air Washington Act, the Interlocal Cooperation Act), federal law (such as the Safe, Accountable, Flexible, Efficient, Transportation Equity Act -- a Legacy for Users, the Presidential Executive Order 12898 on Environmental Justice, the Clean Air Act), its Interlocal Agreement with its members, as well as the requirements related to the designations as the Regional Transportation Planning Organization, Metropolitan Planning Organization, and Economic Development District for the central Puget Sound region.

I-085-002 VISION 2040 has been revised to, in several areas, more fully address climate change. For example, see the climate change policies in the environmental section.

I-085-003 VISION 2040 is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to comment I-085-001).

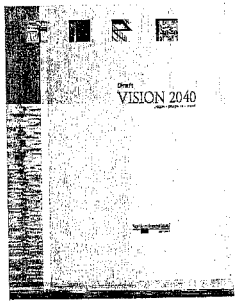
I-085-004 Fiscal analysis has been completed at a scale and level of detail appropriate for this regional visioning process. A statement addressing fiscal analysis has been added to VISION 2040.

I-085-005 VISION 2040 is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to comment I-085-001). PSRC is not a legislative body.

I-085-006 Comment noted. Note that Kitsap County has been a member of PSRC, and its predecessor agencies, since the 1950s.

I-085-007 See Part IV: Implementation.

I-058



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CONTACT INFORMATION:

At a minimum, please provide your name, the county in which you live, and ZIP Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

NAME Stephen Antupit Antupit

ORGANIZATION

ADDRESS 5638 12th Ave NE

Seattle KING CO STATE WA ZIP 98105

E-MAIL ☐ CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.

COMMENTS:

Several areas of the Multi-County Planning Policies lack an emphasis that could move the Environmental Framework into implementation strategies. This might be termed "Green Infrastructure"

Two examples from the Vision 2040 draft illustrate how natural systems & processes could be design factors leading to more sustainable Transportation and Public Services/Facilities investments. Draft Multi-county planning Policy language ~~exists~~ is following:

PUBLIC SERVICES (~MPP-PS-7) "Learn from, use, work with natural systems & ecological processes to inform design and achieve high performance, best life-cycle efficiency in evaluating public facilities & services - both new infrastructure and replacement projects.

TRANSPORTATION (MPP-T-29 [new]) - Leverage & mutually support transportation investments and other public service infrastructure via Integrated Design of capital programs and specific projects to respond to natural systems and ecological functions as well as to avoid duplicate/redundant and/or conflicting infrastructure investments.

TRANSPORTATION MPP-T-17 [or 18] - Add language such as: "Incorporate strategies that leverage/support natural systems & ecological processes in transportation facility and system design."

I-058-001

I-058-002

I-058-003

PLEASE ADDRESS COMMENTS TO:

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

I-058-001 VISION 2040 was revised to address this issue. See the actions in both the Environment and Development Patterns sections. For example, see DP-Action-9.

I-058-002 Although this issue was considered in the VISION 2040 update process, no new policy was added.

I-058-003 VISION 2040 has been revised to address this issue. The Transportation section now has a subsection entitled "Sustainable Transportation" that includes policies that address transportation.

VISION 2040

What do you think of VISION 2040?
We want to hear from you.

I-161

The biggest demographic shift in this region will be the aging of our population. People 60+ will be 22-25% of the population by 2025, definitely at least 25% by 2030 & growing. We need to take this shift into account in all planning aspects. Communities which work well for older citizens will work well for everyone. I do not see an awareness of this in the Plan.

I-161-001

☒ Yes! Please add me to the VISION 2040 mailing list.

NAME Susan Starrfield
ADDRESS 16826 1st Ave SE
CITY/STATE/ZIP Bothell WA 98012-5905
EMAIL Jamesfield@hotmail.com

I-161-001 Comment noted. Also, see VISION 2040 Issue Paper on Demographics.

Comment Letter

I-097

Robin McClelland

From: FormProcessing@psrc.org
Posted At: Saturday, September 01, 2007 5:25 PM
Conversation: Draft VISION 2040 Comment
Posted To: Vision 2040

Subject: Draft VISION 2040 Comment

Hello!
This is results of submitted form by 24.18:48.45.

Submitter Email : FormProcessing@psrc.org

Fields:
01.name = Tom Ehrlichman, Attorney at Law 02.address = 2827 Rockefeller Avenue 03.city = Everett 04.state = WA 05.zip/postalcode = 98201 06.email = tehrlichman@tjelaw.com 07.comments = Please make me a party of record for the Vision 2040 and SDEIS public comment periods. Thank you. I-097-001

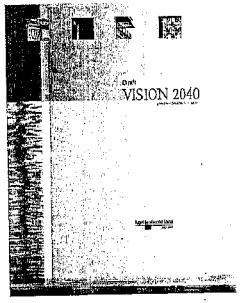
Thank you.
08.mailing list = yes
09.mailtype = email
mailto = vision2040@psrc.org,dmclaughlin@psrc.org
subject = Draft VISION 2040 Comment

1

Response to Comment Letter

I-097-001 Comment noted. You have been added to VISION 2040's notification database.

I-164



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NAME VALERIE DALA

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ADDRESS P.O. BOX 939

CITY KIRKLAND STATE WA ZIP 98083

E-MAIL [X] CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.

Draft VISION 2040 Comment Form

My thoughts are as follow:

1. Accelerate the timetable for the light rail. Everyone would win. Its existence would be beneficial for the environment, business, and wildlife and human health. Who/what would not be a winner?

In the years when the oil, auto, and tire companies were buying up the trolleys and other mass transit, it seems as if the U.S. government was almost complicit in allowing the companies' monopolization strategy. The only influence that could have countervailed the companies' takeovers was the government.

I think the government has a responsibility to accelerate the actualization of mass transit. MPP-EC-7, on page 60, states: "Encourage all businesses [and government] to incorporate environmental and social responsibility into their practices."

Please see an enclosed excerpt from Barry C. Lynn's End of the Line The Rise and Fall of the Global Corporation that relates to big business influence and control.

I-164-001

I-164-001 The Destination 2030 update provides the opportunity to address this issue.

2. Require golf courses to reduce pesticide/fertilizer use. (I think that the U.S. Golf Association has guidelines for this.) Washington state could **certify** and **promote** less toxic golf courses. One golf course I visited had a sign to the effect of: "Do not wash your clubs in the pond. The chemicals on your clubs will kill the fish."

I-164-002

I-164-002 Comment noted. See revisions to what is now MPP-En-15.

3. Implement a tax per square foot for new construction housing over, perhaps, 4000 square feet both at point-of-sale and on yearly real estate taxes. Many large homes are unequivocally poorly designed resulting in energy inefficiency, reduced impervious surfaces, and wasted natural resources. In

I-164-003

I-164-003 See sidebar on the sustainable home and green building.

(Comment continues on following page)

addition, these large homes would require designated energy-saving features.

4. Create a four-year college in Snohomish County. "Ensuring high-quality and accessible education" (Supplemental Draft EIS, page II.56) would help abate the county's brain drain, give direction and purpose to many young people, and reduce illegal and destructive behavior.

5. Prevent extra strain on our future medical facilities.

a. Make physical education mandatory for grades kindergarten through 12th grade.

b. Make food preparation/cooking/nutrition classes mandatory for all middle school students for a minimum of one semester. Investment in cooking appliances/equipment for schools would not be necessary since the hands-on food preparation could be done at home.. A regular weekly potluck meal could be the highlight of the class. Kids would learn to have control over food selection and eat more nutritiously, health would improve and obesity would decline especially combined with "changing the operating environment to make walking, biking and using transit attractive options to driving alone." (Supplemental Draft EIS, page II.57.)

c. Require employees with unhealthy lifestyles (smoking and overeating) to pay toward their healthcare insurance --- whether they are covered by state, employer, or self-insured employer insurance.

Insurance companies could have a standard coverage for non-smoking and non-obese employees. If an employee is a non-smoker and non-obese then the state/company could offer to pay for standard health coverage. However if an employee is a smoker and/or obese then the employee would have to pay the excess premium that the insurance company would charge above the standard rate. (Similar to title insurance coverage: standard, expanded, and extended.) Those who are responsible for excess

(Comment continues on following page)

Continuation of I-164-003

I-164-004

I-164-005

I-164-006

I-164-007

I-164-004 This is supported by the Regional Council primarily through the Prosperity Partnership.

I-164-005 This idea is best considered by the state and by local school districts.

I-164-006 See response to I-164-005.

I-164-007 This issue was not addressed in VISION 2040. Although health is addressed in VISION 2040, this specific issue was not included.

health costs would be paying for those costs or would have incentive to change their habits. The state could offer free/inexpensive smoking cessation and dietary classes. A time period of, perhaps, 18 months could be given for employees to comply.

Furthermore, companies that presently cannot afford to offer insurance coverage to their employees might in this case be able to do so since coverage premiums would be less.

The availability of mass transit, physical education and cooking classes in schools, and pedestrian and biking paths would all complement each other creating less strain on our future medical facilities and a healthier population and bottom line.

Please see the enclosed copy of a Kirkland Reporter article on the positive results of the Kirkland Police Department implementing "a system of fines and suspensions to curb the number of false alarms police were responding to."

Continuation of I-164-007

False alarms drop by almost 50 percent

By ERIKA HOBART
Staff Writer

Almost 2,100 Kirkland residents and business owners have registered their security alarms with the city since the City Council last year implemented a system of fines and suspensions to curb the number of false alarms police were responding to.

Last year, Kirkland Police Capt. Gene Markle told Council members that a tiny percentage of the alarm calls police were summoned to turned out to be actual crimes in progress. The remaining were false alarms.

Since the Council implemented the program — which requires all residential and commercial security alarms be registered, and establishes warnings, a progression of fines and, eventually, suspension of police response — the number of false alarms has dropped 47 percent, police said, from 2,574 false alarms in 2005 to 1,360 last year.

Markle said the program has been beneficial for both the police department and the community.

"On average it takes about 20 minutes to respond to an alarm," he said. "The false alarm program greatly frees up time for the officers to concentrate on patrolling and responding to other calls."

The police department sends two officers and patrol cars to each alarm. That accounts for 40 minutes of time Markle said officers now can spend on more important things. "This cuts back on the eye-rolling alarms and lets the officers do what they're supposed to be doing," he said.

On first offense, owners of false alarms receive letters about the program. Owners are charged with progressive fines for subsequent offenses, and police response is suspended for owners who rack up six offenses or more.

A majority of those who registered their alarms have been homeowners, according to city officials. It's typically easier for homeowners to identify what's causing an alarm to go off because there are fewer people coming and going, said Patricia Ball, who manages the false alarm program in the city's finance and licensing department.

Most of the offenses have been given out to business owners. Ball said eight commercial locations are under restrictions.

Police will still go to restricted areas if a call is made to them by a person, but their goal is to have owners take responsibility for their security systems and to find out why their alarms are repeatedly going off.

"Alot of the time these alarms are set off by hired help or new employees who haven't been trained on the correct code for entering the building," Ball said. "The hope is that businesses and residents will become aware of these situations and help the police avoid unnecessary trips."

Contact Erika Hobart at erika.hobart@kirklandreporter.com or 425-822-6916.

Note: This page of comments does not require a response.

 BARRY C. LYNN

For any manufacturer, the ideal is to reach a point where their company not only is able to affect the pace of change of the key technologies within its industry—which gives it more ability to manage its own cash flow and profits—but to determine the direction in which the technologies evolve. In the late 1990s, Berkeley professors Michael Borrus and John Zysman coined the term "Wintelism" to describe how some companies win control over the setting of standards in an unregulated and open system. Based on a common conflation of the words Windows and Intel, Borrus and Zysman defined Wintelism as a standards-setting strategy pioneered by Microsoft and Intel in the mid-1980s, after the two firms had been awarded de facto monopolies from IBM to develop the operating system and key semiconductors for IBM's personal computers. The two upstarts moved first to seize "control" over the "evolution" of the PC's key standards, which they did in alliance with the legions of hardware companies that IBM had licensed to manufacture IBM-compatible products. Once that was accomplished, Microsoft and Intel shifted to a more defensive game, in which they developed "strategies to set and control the evolution of de facto standards," both to prevent IBM from bringing the key PC technologies "back in house," and to fend off all the other upstarts seeking to carve away a chunk of the new business.[40]

In the case of Cisco, the company's key tool for grabbing and keeping control of its industry was its "Internet Operating System," or IOS. This was a Windows-style program that functioned as a sort of electronic railroad track to connect all Cisco's various products to each other, and to any product manufactured by a company that agreed to pay a fee to run on Cisco's track. By 1997, Cisco had awarded licenses to companies ranging from Hewlett-Packard to NEC to Alcatel to Ericsson. And with its market position always under siege, Cisco continued to churn out generation after generation of its operating system, to make it harder for any potential competitor to pry Cisco's customers away from Cisco products.[41] Rather than focusing on manufacturing, Cisco focused on becoming the company that decided what its suppliers manufactured *and* what its competitors manufactured. Cisco became, in the words of Borrus and Zysman, a "pure product definition" company.[42]

Obviously, such a strategy is most possible in electronics-related industries. But as more and more products come to be dominated by electronics controls, such a strategy comes within the reach of more companies. And the effects can be profound. Using such a strategy, lead firms are able to keep a much tighter control over their suppliers, even at times to the point where they feel comfortable relying on single tier-one suppliers.

In recent years, as vertically integrated companies off-loaded more and more of their manufacturing activity, and as new companies grew up amid an ever-wider and -brighter universe of suppliers, we have for all intents witnessed the formation of a new type of system. In the past, competition at the level of the product took place between companies arrayed in a line, between companies that directly managed (if they did not directly own) every stage in bringing their products to market, whether it was the manufacture of screws or the design of the operating system or the marketing of the end product. But with Cisco, as to a lesser degree Microsoft and Intel, we have witnessed the ascension of what can be thought of as the "hub" firm. These are companies that, by becoming the first to truly dominate a sector, emerge as the center of their own systems, with even competitors reduced to the status of satellites.

In the 1950s, General Motors and Ford, in a series of negotiations with the United Auto Workers, agreed to a basic distribution of power and profits within the automotive industry. Roughly half of the value of the average car would be produced in-house by unionized employees at GM and Ford, while half would be produced by outside suppliers where the workforce might or might not be unionized. For more than thirty years, this balance was almost perfectly reflected in the overall employment levels in the industry. Even in hard times, the nearly perfect fifty-fifty split remained intact, as the Big Three and their suppliers tended to lay off and hire workers in almost exact tandem well into the 1980s.[43]

This manager-centered system only began to break down under pressure from Japanese competition. As noted earlier, when the Japanese assault really began to draw blood, managers in the U.S. auto industry were convinced that the main reason their companies kept losing market share to Toyota and Nissan was the high cost and high rigidity of their unionized workforce. Now, with market share and profits both falling, the automotive firms for the first time in decades launched a real assault on the

Note: This page of comments does not require a response.

Comment Letter

Robin McClelland

From: FormProcessing@psrc.org
Posted At: Friday, September 07, 2007 4:30 PM
Conversation: Draft VISION 2040 Comment
Posted To: Vision 2040

Subject: Draft VISION 2040 Comment

I-150

Hello!
This is results of submitted form by 209.90.238.27.

Submitter Email : FormProcessing@psrc.org

Fields:
01.name = Vera Cooley
02.address = 8508 41st St. W
03.city = University Place
04.state = WA
05.zip/postalcode = 98466
06.email = pco28419@gmail.com
07.comments = 1.

To encourage enterprise level employers to locate in the South Sound, zoning regulations on building height must be changed. I-150-001

Why is there so much congestion between Tacoma and Seattle on I5N in the am and I5S in the pm? Because people go where the jobs are and they aren't in Tacoma. I-150-002

I could envision Microsoft and other employers of note locating satellite offices in Tacoma if they could get the square footage. Continuation of I-150-001

2. Public transportation alternatives are terrible and will not necessarily be better with the planned light rail. I-150-003

Why are there no express buses from Tacoma to Bellevue? I-150-004

Or from Tacoma to the Overlake Transit Center in Redmond. I-150-005

Why can we not have 24 hour public transit? I-150-006

3. Pollution of Puget Sound will continue as long as septic systems are allowed in the region. We do not even have the proper type of soil for effective septic systems. Septic systems must be phased out. I-150-007

08.mailing list = yes
09.mailtype = email
mailto = vision2040@psrc.org,dmclaughlin@psrc.org
subject = Draft VISION 2040 Comment

1

Response to Comment Letter

I-150-001 Issue best addressed at the local jurisdiction level.

I-150-002 Comment noted. Also, VISION 2040 seeks to impact this issue by promoting a closer balance between jobs and housing in its Regional Growth Strategy. For example see what is now new policy MPP-Ec-20.

I-150-001 (continued) See response to previous I-150-001.

I-150-003 Comment noted.

I-150-004 Issue best addressed by Sound Transit.

I-150-005 See response to I-150-004.

I-150-006 Issue best addressed by local transit providers.

I-150-007 VISION 2040 has been revised to address this issue. MPP-PS-9 and MPP-PS-10 address the issues of sewer extensions and replacing failing systems.

Comment Letter

I-109

Robin McClelland

From: VGunby@aol.com
Posted At: Friday, September 07, 2007 12:45 AM
Conversation: Added Gunby Comments relating to the Transportation Policies in Vision 2040
Posted To: Vision 2040
Subject: Added Gunby Comments relating to the Transportation Policies in Vision 2040

Dear Norm,
Please add the following to my comments which I submitted earlier today.

1. My priorities are similar to the Transportation Policies in the V2040, but I urge PSRC staff to look to more innovative policies/strategies that will help link land-use to transportation decisions. We have opportunities for implementing long needed change, beyond CTR and vanpools, carpools and park and ride-lots in the developing suburban centers. These are the areas that will make the differences in implementing V2040 and making the needed changes required for the 21st century! I-109-001

2. With Peak oil, Climate Change, health and other challenges, it is more important than ever for PSRC to be promoting a regionally sustainable multi-modal transportation network, integrated with adopted regional land use policies within and outside of the urban areas. I-109-002

3. Pricing is an innovative and effective way to meet our region's Climate Change challenges, because the majority of our region's GHG is due to driving vehicles. The PSRC is learned on this subject and has been involved in very innovative progams dealing with pricing for over 10 years. Now it should take a Leadership role in helping our region develop a regional system of Tolling on the major highways. I-109-003

4. I suggest that the PSRC to develop a "Model" Sustainable SR 520 Corridor Efficiency Agreement with at least the parties involved in the Mediation. The FHWA and TRB have some papers on this type of Corridor Agreement that provide a lot of guidance.
WSDOT's Jean Mabry did some excellent research on this Corridor Management Agreement idea with a FHWA Community Preservation grant of nearly a million FHWA dollars during the Translake's 520 Stage, but it appears to be forgotten. (Robin Mayhew is aware Jean's work.)

It could help to promote a sustainable 520 transportation link and be a Model for future agreements. It could include:
- involvement of the major cities, counties and employers and institutions that are adjacent to the 520 corridor, between I-5 and Redmond,
- encourage suburban land-use changes to encourage transit friendly development and mixed-use activity centers, reduce air pollution, promote safety and reliable new multi-modal travel,
- tolls and other TDM tools,
- a plan for the reduction of the eastside cul-de-sac community development that are difficult to serve with transit,
- and annual Monitoring and Reporting of the Performance of the corridor in meeting the objectives agreed to by the parties involved, and revisions, if needed to improve the performance, such as
-- the success in promoting the increase use of transit, reducing the SOV trips and encouraging corridor cities to promote and plan for transit-friendly land-uses on the current suburban, cul-de-sac eastside of lake. I-109-004

If successful it would be a model for use on other major corridors.

The recent Federal grant for SR 520 that purchases buses for Metro to use on SR 520, and other prograns, makes this all the more important a project for the PSRC Transportation staff.
It could help to encourage the state to take a more active role in supporting our local and regional transit systems financially, when they see the reduction in GHG and auto trips from an effective Corridor Agreement.

Please ad these as additional to my earlier comments.
Thanks!

9/7/2007

Response to Comment Letter

I-109-001 VISION 2040 has been revised to address this issue, with stronger policies and narrative in the transportation section. The Transportation section now has a subsection entitled "Sustainable Transportation" that includes policies that address transportation and the effects of emissions.

I-109-002 VISION 2040 has been revised to address this issue, with stronger policies and narrative related to clean transportation technologies, multimodal solutions, and more.

I-109-003 What is now MPP-T-33 includes a reference to user fees and tolls as financing methods. In addition, the issue of regional tolling will be a key consideration in the Destination 2030 update.

I-109-004 The Destination 2030 update will provide an opportunity to address this issue.

Virginia Gunby

Get a sneak peek of the all-new AOL.com.

9/7/2007

Response to Comment Letter

Note: This page of comments does not require a response.

Comment Letter

TO: PSRC Norm Abbott, Responsible Official SEPA
From: Virginia Gunby, 2540 NE 90th. St. Seattle, WA 98115
RE; Comments on the Vision 2040

September 6, 2007 I-157

The Documents: Overall, the documents you have prepared are very good and positive for the staff to use and to try to explain to elected officials and their local governments. In the past years I decided that planners like to dream a regional vision for the future, but do not have the training or need to articulate and educate the elected officials or the regions populous, in order to have the dreams come true.

I believe that you have taken a new PSRC pro-active approach that could lead to a new framework for regional decision-making, through actively promoting the implementation of the Vision 2040 countywide planning policies. After over 15 years since the passage of the state GMA, we need to take a look at how or if it is working in our region. I believe that in King County is working and is consistent with GMA But from what I have observed and read, the other three counties are in various stages of denial, that includes large suburban growth boundaries, no pressure for compact mixed-use cities and are promoting auto-dependent sprawl, and getting away with it, and GMA policies are not being followed.

1.) Cheers to the State Department of Community, Trade, and Economic Development for providing the financial support to PSRC for the development of the Regional Design Strategy which provides some great regional examples and should help to spark the county and city staff imaginations and transform them into giving more emphasis to core cities, as primary places for population, and emphasizing new growth in sub-regional centers. (I enjoyed being able to participate in part of the development of the "Strategy".)

2.) Would you develop/evolve a strategy to move PSRC further along in working with the local governments, at the sub-regional level, to implement many of the proposed regional policies? PSRC should get the power to review and comment, as you do with the local transportation plans, on the consistency of major land-use/transportation (large public or private development actions) to the adopted Vision 2040. It would at least give more visibility and promote more consistent sub-regional proposals? Even though Sound Transit's proposed program of the November 2007 Regional projects were reviewed by PSRC, it was not given a chance to review the Monorail proposal's plans publicly, nor the RTID road projects for consistency with the Vision 2030 or Destination 2030. That is a major weakness in the agency.

With the new Vision 2040 documents, translated into some feasible steps for strengthening the PSRC's role, I believe that the regional policymaking process could be updated and/or strengthened starting now. Or there will be a repeat of the state legislative, uniformed thrashing to reduce or fragment the current powers of the PSRC, as we saw this past year during the push for the Regional Transportation (elected) Commission.

3.) Another way I suggest to make a regional impact. PSRC needs to get some advice from some informed regionally-oriented Public Affair's Consultant, to do some independent thinking and advice the PSRC staff on ways to really implement the great major regional policies and programs at the local level. At least work to get the public TV Channels to take up your cause.

4.) I also suggest that your Board establish a technical, independent group to annually monitor the accomplishments of the Vision 2040, in order to help it become more visible to the regional public.

Last of all it has been very difficult for many of us to find the time during the summer to find the time to review and comment on your very fine documents, VISION 2040, Appendix 1, and the unique, new Regional Design Strategy—In Support of VISION 2040 for the PS Region.

I also would encourage you to have some more public meetings on the proposed documents, when the staff and the public can discuss the most relevant issues.

Regards!
Virginia Gunby

File:PSRCCoVis20409707.doc

I-157-001
I-157-002
I-157-003
I-157-004
I-157-005
I-157-006
I-157-007

Response to Comment Letter

I-157-001 Comment noted. VISION 2040 has provided clearer regional guidance and specific implementation steps.

I-157-002 Comment noted. The regional discussion that was part of VISION 2040 process was designed to help local governments be more coordinated regarding growth management issues. VISION 2040 includes additional outreach in G-Action-1.

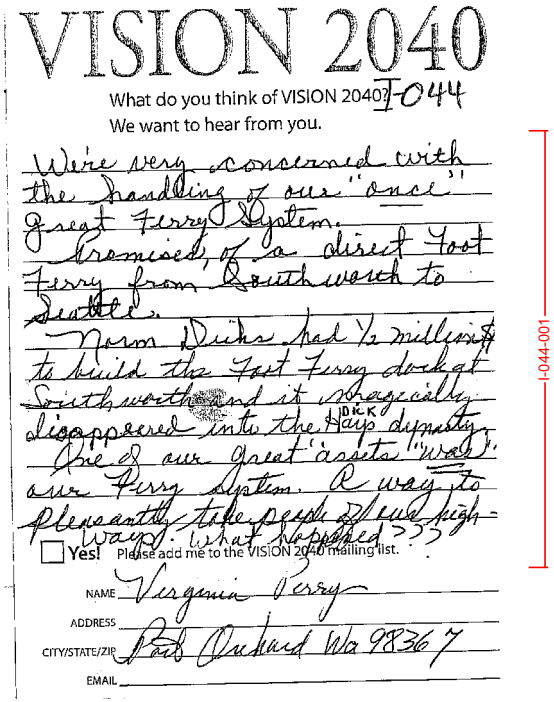
I-157-003 Concur.

I-157-004 Comment noted. See T-Action-9.

I-157-005 VISION 2040 narrative has been revised to address this issue, and ongoing outreach will occur as PSRC works to implement VISION 2040. Also see G-Action-1.

I-157-006 PSRC is committed to convening such a group. See G-Action-2.

I-157-007 The VISION 2040 update process included three extensive public comment periods. One was during the scoping phase, another during the DEIS review phase, and the third during the draft VISION 2040 and SDEIS review stage.



VISION 2040

What do you think of VISION 2040? I-044

We want to hear from you.

We're very concerned with the handling of our "once" Great Ferry System.

Promised, of a direct foot Ferry from Southworth to Seattle.

Norm Dicks had ½ million $ to build the Foot Ferry dock at Southworth and it tragically disappeared into the Hays dynasty. DRK

One of our Great "assets" was our Ferry System. A way to pleasantly take people & view high-ways. What happened >>>

☐ Yes! Please add me to the VISION 2040 mailing list.

NAME Virginia Perry

ADDRESS

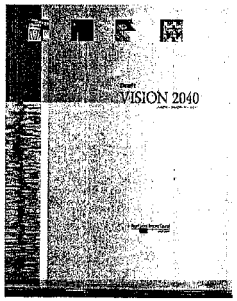
CITY/STATE/ZIP Port Orchard Wa 98367

EMAIL

I-044-001

I-044-001 The issue of ferry service will be considered when Destination 2030 is updated.

1-076



Draft VISION 2040

And Supplemental Draft Environmental Impact Statement

Comment Form

What do you think about the draft regional growth strategy and multicounty policies in VISION 2040?

We want your input and need to hear from you!

The public comment period lasts from Monday, July 16 through Friday, September 7, 2007.

The public is encouraged to provide thoughts, ideas, and concerns on the Draft VISION 2040. Comments can be made in one of the following ways:

- By writing to Norman Abbott, State Environmental Policy Act (SEPA) Responsible Official, at the Puget Sound Regional Council, 1011 Western Ave, Suite 500, Seattle WA 98104-1035
- By visiting the Regional Council's Web site www.psrc.org. To submit a comment, go to the Comment section of the VISION update Web page and follow the instructions.
- By sending an email to vision2040@psrc.org.
- By attending any of the Regional Council's board, committee, or other meetings and submitting a comment. A public comment period is offered at the beginning of each meeting.
- By returning this comment form.

The comments that you make will become part of the public record for this project. Your thoughts will help decision makers as they finalize VISION 2040 in fall 2007. Responses to your comments will be provided in the Final Environmental Impact Statement.

Regional VIEW, the Regional Council's monthly newsletter, is one good way to stay informed and involved. To receive a print copy of *Regional VIEW*, visit http://www.psrc.org/publications/pubs/view/viewform.htm, or call 206-464-7090.

CONTACT INFORMATION:

At a minimum, please provide your name, the county in which you live, and ZIP Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

NAME VIVIAN HENDERSON

ORGANIZATION _____

ADDRESS P.O. Box 2133

CITY Park Orchard STATE WA ZIP 98366

E-MAIL VIVIANKAPOOR@WAVECABLE.COM ☐ CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.

OPINIONS

Kitsap Peninsula Business Journal Sept. 2007

Who *are* these people making *our* decisions for us?

(Editor's Note: As a candidate for Mayor of Port Orchard, I believe it is inappropriate for me to continue writing this column — at least until after the election. During the period between now and then, we will feature guest columnists commenting on whatever issues they want to share with our readers. This issue, Vivian Henderson, executive director of the Kitsap Alliance of Property Owners shares her views on the PSRC.)

"Who are these people?" I was recently asked that question as I was leaving a public meeting held by the Puget Sound Regional Council (PSRC) seeking public comment on their recently completed "Vision 2040 People — Prosperity — Planet."

"Vision 2040 is about the region's future." This 100 page "Vision" lays out "policies" that will improve our region's quality of life, and will balance "...individual rights with the larger needs and values of society.

They've taken care of it all — transportation, economic development, land use, environmental justice and social equity. These policies will also protect, "...the sense of place people have come to value" (as long as your sense of place is in a high density urban core).

One of their "Overarching Goals" is to focus growth in urbanized, compact, transit oriented communities, reducing reliance on the automobile, and promising rural lands and natural resource lands will be permanently protected. Natural resource lands are defined as agriculture, forest, shorelines and mineral lands.

Even global warming hasn't been overlooked. PSRC is developing policies to anticipate and mitigate the impacts of climate change. We'll have fewer automobiles, "greener" homes, "efficient" landscaping — all the better to reduce greenhouse gasses.

PSRC is worried about our well-being. They plan to "Develop the relationship between land use and health" exploring ways to improve our physical, social and mental health. Obesity, depression and premature death are all connected to "the ways we travel." Their solution is for us to drive less and walk, bicycle and take public transit more. That will make us healthier and happier. We will all be safer since "more driving results in more vehicle-related accidents."

VIVIAN HENDERSON
My Turn

Who *are* these people? A whole new layer of regional government — an association of cities, towns, counties, tribes, ports and state agencies that develop regional growth and transportation policies for Snohomish, King, Pierce and Kitsap Counties. They are comprised of three policy boards: Transportation, Economic Development and Growth Management. Membership includes 71 cities, four ports, two state agencies and two tribes.

PSRC staff tells us that they are not a regulatory agency and it is not mandatory for local jurisdictions to adopt their policies. They may not tell you they have a big hammer. PSRC controls millions of dollars in grant money. Jurisdictions that don't adopt PSRC's "policies" as regulations, will risk losing grants.

I have attended PSRC's policy board meetings in Seattle — a process completely driven by staff. PSRC has 85 employees and a $24,500,000 biennial budget. The Growth Management Policy Board members include government officials from all four of the counties; some of the cities, Port of Bremerton, the Suquamish Tribe, the State Office of Community Development, two representatives from business and labor and representatives from the Sierra Club and Futurewise — well known activist organizations committed to controlling how and where we live.

What all these people have in common is a belief that government has *all* the solutions to life's problems — large and small. They are entirely focused on their utopian plan, completely convinced that they *know* what is best for us.

I did not recognize a single member who would stand up for your constitutional rights to life, liberty and property. Many of the members don't speak at all in the meetings. I've wondered if those who remain silent understand what is going on — or perhaps they agree with everything — or worst yet, they disagree but don't have the political courage to speak up.

Did you ever vote for Dow Constantine? Mr. Constantine is a PSRC member representing King County. He has more to say about the lifestyle imposed on *you* by our local government than *anyone* you vote for in Kitsap County.

One of PSRC's promises to local elected officials is to "Address issues that are difficult to resolve at the individual jurisdiction level." That means if our local elected officials make a decision or pass a law that is unpopular with the electorate, they can tell us that the "PSRC made us do it," or "It's a condition of the grant!" Presto! PSRC absolves them of any "political liability."

Local governments are losing their autonomy and you will lose your influence and clout as a voter and taxpayer.

How much does the public know about PSRC and their junior partner KRCC (Kitsap Regional Coordinating Council)? PSRC meetings are held in Seattle while you are working. KRCC meetings are 8 a.m. on a Tuesday. After repeated requests to KRCC to video their meetings for broadcasting on our local channel, they still have not done so.

Neither agency is big on public participation. On June 28, the PSRC Executive Board released an e-mail stating that "PSRC's adopted Public Participation Plan is designed to outline the *minimum* requirements for public involvement in order to meet federal, state and PSRC bylaw guidelines..." So much for open government.

Citizens need to learn about these powerful agencies and how they "bend" our lives to fit into their social engineering schemes. If you are as concerned as I am, check out the PSRC and KRCC websites and tell your elected officials to step up to the plate and assume the responsibilities they swore to uphold. Tell them you don't approve of their delegating their sacred duties to these quasi-governmental agencies who are responsible to no one and whose constitutionality is in serious question. Visit them at www.psrc.org and www.kitsapregionalcouncil.org.

(Editor's Note: Reach Vivian Henderson, Executive Director of the Kitsap Alliance of Property Owners at 360-710-8560 or vivianka po@wavecable.com.)

I-076-001

Comment Letter

Response to Comment Letter

I-076-001 Comment noted. VISION 2040 included an extensive public outreach effort. Public views shaped the VISION.

I-132

Robin McClelland, AICP
Principal Planner
VISION 2020 Outreach
Puget Sound Regional Council
1011 Western Avenue # 500
Seattle, Washington 98104-1035
206-389-2879 phone
206-587-4825 fax

From: wknedlik@aol.com [mailto:wknedlik@aol.com]
Posted At: Friday, September 07, 2007 5:00 PM
Posted To: Vision 2040
Conversation: Comment on Draft Vision 2040 as the product of PSRC as a rogue agency
Subject: Comment on Draft Vision 2040 as the product of PSRC as a rogue agency

Norman: Abbott:

Please enter the below-indicated comments on the PSRC's Vision 2040 draft, and please acknowledge receipt of same as timely filed.

The PSRC's open disregard for, and utter defiance of, its primary transportation planning obligation for more than 13 full years -- *i.e.* to develop "a regional transportation plan that: (a) Is based on a least cost planning methodology that identifies the most cost-effective facilities, services, and programs," pursuant to RCW 47.80.030, since July 1, 1994 -- both subvert every core element stated within its *VISION 2040 Vision Statement* at page 1, and also undermine every substantive section thereafter which nominally builds on its self-compromised distortions of its statutorily required planning processes by means of its sleights-of-hand, its three-card-monte machinations and worse.

As suggested rather too gently by John Niles' comments of this date, which are incorporated by this reference, PSRC's operations have aided and are abetting the most serious misallocations of the largest local-option tax increase in all of American history by Sound Transit and by the RTID, at $150.5 billion in **real** tax costs for citizens between 2008 and 2058 as proposed by them, sub silentio, as $17.9 billion in **backdated** project costs in order to deceive regional taxpayers with PSRC's active participation, and those gargantuan misallocations of limited financial resources here with PSRC's intentionally wrongful cooperation is so abysmally harmful that such fiscal malfeasance thought its knowing and intentional violation of its primary transportation planning duty not only imperils the regional economy, but also jeopardizes financial destruction of public and higher education in this state, while also managing to foster global warming by co!
vering up negative carbon-payback from Sound Transit's counterproductive tunneling for light rail for at least half a century and until long after the tipping point will have been reached due in crucial part to the PSRC's affirmative wrongdoing (or avoided despite PSRC's grotesque misconduct above indicated).

I-132-001

I-132-001 Comment noted.

(Comment continues on following page)

As long as PSRC pretends to plan pursuant to state law, but in fact distorts public processes so as to destroy public trust by perversions of its primary statutory obligation as to transportation planning, it, its elected leadership and its senior staff will all continue to document its increasingly obvious role as a rogue agency intent on destruction of everything that its elected leaders and bureaucrats nominally purport to seek to do.

Continuation of I-132-001

Respectfully yours.

Will Knedlik

425-822-1342

Email and AIM finally together. You've gotta check out free AOL Mail!

Robin McClelland

From: wknedlik@aol.com
Posted At: Friday, September 07, 2007 5:00 PM
Conversation: Comment on Draft Vision 2040 as the product of PSRC as a rogue agency
Posted To: Vision 2040
Subject: Comment on Draft Vision 2040 as the product of PSRC as a rogue agency

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Respectfully yours.

Will Knedlik

9/10/2007

Note: This page of comments does not require a response.

425-822-1342

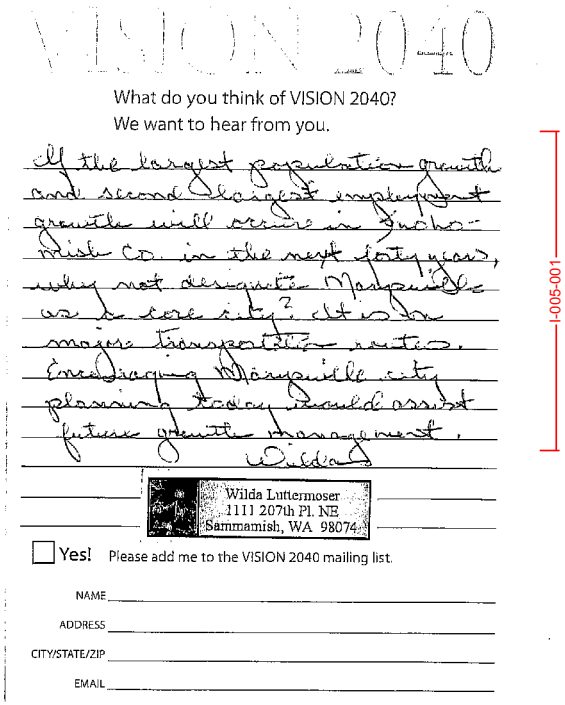
Email and AIM finally together. You've gotta check out free AOL Mail!

9/10/2007

Response to Comment Letter

Note: This page of comments does not require a response.

I-005



VISION 2040

What do you think of VISION 2040?
We want to hear from you.

If the largest population growth and second largest employment growth will occur in Snohomish Co. in the next forty years, why not designate Marysville as a core city? It is on major transportation routes. Encouraging Marysville city planning today would assist future growth management.

Wilda

Wilda Luttermoser
1111 207th Pl. NE
Sammamish, WA 98074

☐ Yes! Please add me to the VISION 2040 mailing list.

NAME _____

ADDRESS _____

CITY/STATE/ZIP _____

EMAIL _____

I-005-001

I-005-001 The regional growth center designation process is initiated at the local level and is approved at the countywide level before it is brought to the Regional Council for consideration.

I-088

6353 NE Balzow Rd.
Suquamish, WA 98392
Sept. 1, 2007

Norman Abbott
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

Dear Mr. Abbott,

We have been extremely upset by the anti-capitalist, un-American and unconstitutional aspects of "Vision 2020" and it's update. Now we are faced with the abomination of "Vision 2040" and the totalitarian control of our lives, businesses and former freedoms.

The speculation of the results of possible future events does not constitute a rational reason to grant the control of our lives and fortunes to an un-elected group of control freaks.

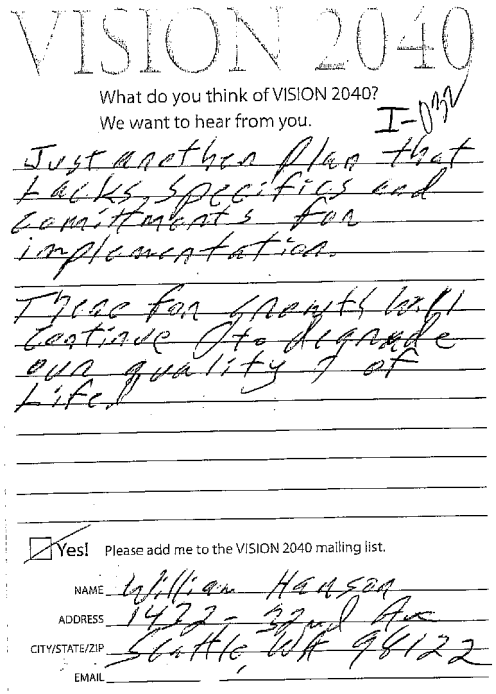
We citizens who lived through, and fought, World War II were confronting countries that had been taken over by just such groups of ideologues as are promoting this agenda. We are adamantly opposed to these programs and proposals.

I-088-001

Sincerely,

William and Virginia Whiteley

I-088-001 Comment noted.



VISION 2040

What do you think of VISION 2040?
We want to hear from you. I-032

Just another plan that lacks specifics and commitments for implementation.

Time for Growth to continue to degrade our quality of life.

I-032-001

☒ Yes! Please add me to the VISION 2040 mailing list.

NAME William Hanson
ADDRESS 1422 32nd Ave
CITY/STATE/ZIP Seattle WA 98122
EMAIL

I-032-001 VISION 2040 provides more specifics than previous work. For example, a numeric growth strategy replaces the conceptual strategy outlined in VISION 2020. Each policy section in VISION 2040 includes actions, and Part IV: Implementation describes a monitoring process to measure implementation.

VISION 2040

What do you think of VISION 2040?
We want to hear from you. I-018

NEW TO THE PROCESS & CONCEPT

I-018-001

☒ Yes! Please add me to the VISION 2040 mailing list.

NAME WILLIAM (BILL) LEAK
ADDRESS 2375 - 130TH AVE NE, SUITE 200
CITY/STATE/ZIP BELLEVUE WA 98005
EMAIL BILL.LEAK@DEACON.COM

I-018-001 Comment noted.

Comment Letter

I-093

Robin McClelland

From: Marshwl@aol.com
Posted At: Saturday, September 01, 2007 9:48 AM
Conversation: Comments of Draft Vision 2040
Posted To: Vision 2040
Subject: Comments of Draft Vision 2040

Why is the state government's solution to every problem, be it real or perceived, to form another bureaucracy? The PSRC (or is it the PSP - there are so many acronyms flying about that we average citizens cannot keep track) is just another such bureaucracy which, once created, only grows. It grows with "Vision " documents creating "Policies" which require more staff to monitor events and create more "Visions" which require more staff. The PSRC members are not elected by us yet we pay for them (85 employees at a cost of over $24 in the budget - at least for now). We pay and suffer the consequences of "policies" that become regulations and render our truly elected officials powerless to protect us.

PSRC (or PSP if that is more correct) should be disbanded and their "Visions" cancelled. Think of the money that would be saved. Our elected officials should step up to the plate and do their jobs using processes already in place.

Bigger government with unelected and unaccountable bureaucrats is not the answer.

I-093-001

William Marsh
3426 Lakeness Rd. NW
Poulsbo, WA 98370
360-779-3772

Get a sneak peek of the all-new AOL.com.

Response to Comment Letter

I-093-001 Comment noted. PSP is the Puget Sound Partnership, a state agency responsible for the clean up of Puget Sound. PSRC members are local elected officials representing local governments.

VISION 2040

What do you think of VISION 2040?
We want to hear from you. I-017

Nice layout, easy to understand,
good research, point of view,

I-017-001

☒ Yes! Please add me to the VISION 2040 mailing list.

NAME Yuka Tokusashi
ADDRESS 1901 NE 85th Street, #307
CITY/STATE/ZIP Seattle, WA 98115
EMAIL Yukacat@hotmail.com

I-017-001 Thank you.

Comment Letter

O-071-

From: Ellen Hiatt Watson [ellen@hiattwatson.com]
Sent: Monday, September 03, 2007 9:38 AM
To: county.executive@co.snohomish.wa.us
Cc: letters@heraldnet.com; John Koster; Rocky Piro; David Gossett; kirke.sievers@co.snohomish.wa.us; David Somers; Gary A. Nelson
Subject: Fully Contained Communities should be avoided.

Open Letter to County Government; copied as a Letter to the Editor: The Herald; and the Puget Sound Regional Council; This letter is submitted to you through 7-Lakes.com. The letter writer's information is included here.
>
> Your Name: Robin Stinardo
> Your Email: robinscpa@msn.com
> Address: 18514 40th Ave NW
> City: Stanwood
> State: WA
> Phone: 360-652-4381
>Open Letter to Puget Sound Regional Council: Dear Puget Sound Regional
>Council:
>
> The use of a Fully Contained Community -- a brand new city which
> cannot truly be self-contained -- is an unrealistic concept and one
> not suited to a busy rural area. These new developments may be suited
> for an economically isolated area that could use an infusion of
> housing and business. But the 7-Lakes area, where the McNaughton Group
> is currently considering this method of development, is a prime
> example of where it should be avoided.
>
> We ask the County Government, Snohomish County Tomorrow, and the Puget
> Sound Regional Council to please avoid the use of FCCs. Snohomish
> County Tomorrow, which is considering a consensus letter to the PSRC,
> should stand its ground and not include County Executive Aaron
> Reardon's suggested phrase to eliminate the PSRC's phrase to "avoid"
> FCCs from its 2040 draft. FCCs should be avoided except where such an
> economic tool is necessary to revitalize an isolated area. In fact, I
> would go further and suggest the PSRC add language that FCCs should
> never be used in pre-determined rural areas that are not economically isolated.
>
> Sincerely,
>
> R Stinardo

O-071-001

Response to Comment Letter

O-071-001 This idea was considered in the VISION 2040 process, but the provisions were kept as written. Although, the word "new" was added before "fully contained communities."

O-126-

7-Lakes

Norman Abbott, Ph.D.
Director of Growth Management Planning
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104

RE: 7-Lakes response to the Vision 2040 Plan of the PSRC

Dear Dr. Abbott:

7-Lakes would like to be a party of record, as a community organization, providing comment on the Puget Sound Regional Council (PSRC) regional growth strategy as part of the "Vision 2040" update to "Vision 2020."

We have reviewed the Draft Vision 2040 provided by PSRC and commend the PRSC's efforts towards the sensible management of growth in our region. As a group centered around the preservation of rural character and livability, we offer our perspective. O-126-001

The Washington State Growth Management Act was a move in the right direction toward restoring and protecting the environment. But sprawl will degrade those successes. A Fully Contained Community (FCC) in an area that is not isolated economically or physically from urban centers would contribute tremendously to degradation. The report states that rural lands are not expected to develop urban service levels or characteristics, and we can think of nothing more urban in nature than an FCC. We fully support your language that FCC's should be "avoided." Further, we would add that they should only be used where they would be a necessary component of economic revitalization of a depressed and isolated area. O-126-002

We also applaud the emphasis on the use of Transfer of Development Rights. As long as the development community can buy rural lands cheaper and have them rezoned, then TDR's will not be successful. There are many elements to making this work, including compliance on the part of counties with the intent of the Act as well as with the letter of the law. That said, we concur that the use of TDR's, as well as market incentives, need to encouraged. O-126-003

Because Snohomish County debates endlessly on the definition of rural character, even using the blight of rural cluster housing as a new standard by which they are defining rural, we would like to see further attempts made to provide concrete definitions and guidance, perhaps using historical architectural perspectives, patterns of use and recreational and wildlife habitat as measures of that character. As one architectural designer recently said, he uses the "little boy standard". That is, in city or country, a little boy has spaces to explore. This could also be translated to a standard that employs good, old-fashioned common sense. Unfortunately, the O-126-004

7-Lakes | PMB 388 | 3405 172nd ST NE, #5 | Arlington, WA 98223 www.7-lakes.com

O-126-001 Thank you.

O-126-002 Comment noted.

O-126-003 Comment noted.

O-126-004 VISION 2040 defines and discusses the issue of rural character. See the revised narrative Part III: Multicounty Planning Policies, Development Patterns, Rural subsection.

7-Lakes

Growth Management Act's silence on defining rural has left a void that developers would like to fill with houses. We feel more guidance could be forthcoming from the state on this matter.

It is with sincere gratitude to you and the greater PSRC community that we thank you for the opportunity to contribute.

Sincerely,

Ellen Hiatt Watson
Chair, 7-Lakes

7-Lakes | PMB 388 | 3405 172nd ST NE, #5 | Arlington, WA 98223 www.7-lakes.com

Note: This page of comments does not require a response.

O-115

Robin McClelland

From: Carlson, Bruce [BCarlson@aarp.org]
Posted At: Friday, September 07, 2007 10:48 AM
Conversation: VISION 2040 Comments
Posted To: Vision 2040
Subject: VISION 2040 Comments

Dear PSRC:

Thank you for the opportunity to comment on the VISION 2040 draft. AARP is very supportive of what's termed "livable communities". We support communities where people of all ages and abilities have housing and mobility options that meet their needs to be safe and comfortable and get where they need to go. A livable community is a key ingredient for independence, choice and control, essential elements for successful aging. O-115-001

Please add me to the project mailing list.

Regards,
Bruce

Bruce Carlson
AARP Washington
9750 Third Ave NE, Suite 450
Seattle, WA 98115
bcarlson@aarp.org
www.aarp.org/wa
206.517.2313

9/7/2007

O-115-001 Thank you.

Comment Letter

O-107

Robin McClelland

From: Don Stuart [dstuart@FARMLAND.ORG]
Posted At: Thursday, September 06, 2007 5:46 PM
Conversation: Comments on the Draft Vision 2040
Posted To: Vision 2040
Subject: Comments on the Draft Vision 2040

Vision 2040 staff:

Thank you for your efforts with the draft Vision 2040. American Farmland Trust supports this effort and believes that the document represents an important and well considered regional growth plan. O-107-001

We have primarily one comment – on the need for permanent protection for natural resource lands and their importance to the future health of our communities.

As you may know, market pressures have driven the cost of the limited remaining farmlands in our region well above what a profitable farm business can afford to pay. This prevents farms from acquiring these lands and drives current farm business owners to subdivide and sell them. The higher the margin becomes between their agricultural and their market value, the greater the pressure to sell, and the more quickly our communities see the fragmentation and ultimate loss of the critically important agricultural land base. The bottom-line truth is that this fragmentation of land into smaller and smaller, unconsolidated, mixed use parcels and the rising cost of land, are destroying agriculture. The smaller and more disconnected these remaining parcels become, the more the chance is for financially productive farming – the result is a death spiral of land fragmentation and farm and forest business failure. O-107-002

There are two desperate needs in this area we hope will be strengthened in the Vision 2040 document:

1. We need better information concerning what is happening – so long as we don't know the real rate of loss of natural resource lands, where it is happening, and how these trends are emerging, it is very difficult to design and to justify solutions. We support Cascade Land Conservancy's comments on this score. O-107-003
2. We need a focus on permanent protection of these lands with purchased conservation easement programs. Substantial financial support for such an effort needs to come from public funding – consistently provided over time. Transfer of Development Rights (TDR) programs might also help if they are well-designed and if they include serious motivation on the part of developers to purchase development rights. But public funding is also critical. The new State Office of Farmland Preservation will, presumably, become a resource in these efforts, and hopefully new State purchase of development right (PDR) programs will emerge in the years ahead to supplement the existing local county level programs, the State's WWRP farmland program, and the Federal Farm and Ranchlands Protection Program (FRPP). The main point here is – zoning alone isn't getting the job done, and doesn't currently seem likely to do so. Public or other reliable funding is needed or this trend is unlikely to change. O-107-004

If we cannot permanently reduce the cost of farm or forest lands to what a farm or forest business can afford to pay, we simply must face the fact that these farm and forest businesses will cease to exist. Without the economic justification for large-parcel protection, it will be much more difficult to sustain large parcels for environmental reasons alone – increasing the political pressures for fragmentation. The land uses that replace these farm and forest businesses will inevitably be much more intensive and will have a much greater environmental impact – heightening the environmental burden on all of us.

Private farm and forest landowners who know that their land is permanently protected for natural resources uses, are able to focus their energies on the long term sustainability of their activities and their properties. They can approach the future with the confidence that protecting the soil's productivity, the local stream's riparian zone, the cleanliness of the water on their land and in the aquifer beneath, is in their best interests and in the interests of every landowner who will come after them. They can know that when they invest in the land, those investments will be returned to them in higher value when the land sells – because the new buyer will be another natural resource business, not a developer. Continuation of O-107-002

(Comment continues on following page)

9/7/2007

Response to Comment Letter

O-107-001 Thank you.

O-107-002 VISION 2040 now includes additional discussion of resource lands, especially agricultural lands. What is now policy MPP-DP-31 was expanded to further discourage conversion of resource lands.

O-107-003 Comment noted. The monitoring program is designed to provide the best data available on a wide range of issues.

O-107-004 Concur. The General policy section has been revised to include an expanded discussion of funding for infrastructure and services.

O-107-002 See response to previous O-107-002. (continued)

Continuation of O-107-002

The loss and fragmentation of these lands will cost us dearly in lost environmental quality, lost quality of live, lost local connections to our food, and lost security of having local access to it. We will forever change and degrade our region and its communities.

Thanks again for your great efforts. I hope the above comments are useful. Please feel free to let me know if you have questions or if I can help in any way.

Don

Don Stuart
American Farmland Trust
Pacific Northwest States Office
3211 Beacon Ave. S. #26
Seattle, WA 98144
(206) 860-4222

O-094

Black Hills Audubon Society

A Washington State Chapter of the National Audubon Society
(360) 352-7299 www.blackhills-audubon.org
P.O. Box 2524, Olympia, WA 98507

Black Hills Audubon Society is a volunteer, non-profit group whose 1,100 members in Thurston, Mason, and Lewis Counties are concerned about wildlife, their habitats, and natural history.

September 3, 2007

Puget Sound Regional Council

Email: PSRC.org

RE: Warehouse and industrial growth in South Sound related to PSRC Container generated trade. Black Hills Audubon Society asks that the PSRC Vision 2040 address this issue.

Dear PSRC planners:

Black Hills Audubon Society (BHAS) is a volunteer, non-profit conservation organization whose 1,100+ members in Thurston, Mason and Lewis Counties are concerned about wildlife, their habitats and natural history. We are a member chapter of the National Audubon Society and nearly 1,000 of our members are residents of Thurston County. Our goals are to maintain, restore and protect our natural ecosystems for future generations, and to promote environmental education and nature-based recreation.

With the Port of Tacoma's and the Port of Seattle's growth in the container business, Thurston County has observed a sudden explosion in proposals for light industrial buildings in our County. Planners suggest this is just the beginning of a major onslaught of warehousing and warehouse related industry along I-5, and perhaps the hinterland of our County.

We have searched, in vain, in your Vision 2040 for a detailed discussion of this phenomenon in either the PSRC or TRPC regions. We apologize if we did not find a section speaking of the impact of extensive warehousing. The environmental and the financial impact of the portending invasion of square miles of this industrial development on South Sound and your region must be addressed. The sustainability of warehousing, with global warming, should be analyzed as well.

By July 2007, developers had expressed the desire to construct 4,000,000 square feet of warehousing within the Tumwater UGA. In August 2007, the City of Lacey had applications for the construction of seventeen 200,000 square feet warehouses. The Vice-President of Michelson-Knapp, a national warehouse firm, testified in a Tumwater hearing this summer that the Port of Tacoma's 2006 purchase of 745 acres in Maytown for a proposed Intermodal Rail and Logistics Center "will change the manner in which goods will move in the area" (We assume the Puget Sound Region and PNW, perhaps nationally?). A planner from Thurston County Development Services suggests that our area might become the Long Beach of Washington.

(Comment continues on following page)

Black Hills Audubon Society is a 501(c)(3) non-profit organization. Contributions are deductible to the extent allowed by law.

O-094-001

O-094-001 Comment noted. VISION 2040 has been revised to address this issue by expanding provisions to address the use of industrial lands in our region.

We Thurston county citizens do recognize that the jobs per square foot of light industrial buildings are quite low in comparison to other businesses. Will the higher paying international jobs, discussed in the cluster analyses of job growth in various PSRC documents, reach South Sound? Or will South Sound be valued mostly for its relatively inexpensive land?

If and when Thurston County becomes the prime staging area for regional goods as well as national distribution, the magnitudes of growth in rail and truck traffic will create enormous congestion. Our sensitive aquifers, wetlands and prairies, the results of having a glacial recessional topography may be threatened by square miles of impervious surface and air pollution.

Various PSRC documents stress the cyclical nature of the 'mature' industry of International Trade. PSRC stresses the value of economic diversity to ensure economic stability. Shouldn't this kind of diversity be also encouraged and observed in our region as well? Should we begin to look at the term region to mean the I-5 corridor?

Will our nation observe a decline in the demand for Chinese goods because of the toxic items appearing in the United States this summer? When the yen gets restructured, will the China trade drastically decline? Plans for multiple industrial clusters are encouraged for Central Puget Sound. We would hope you would honor and encourage the same economic diversity for the Thurston Regional Planning area. A desert of warehouse complexes and supporting industry, which could be considered obsolete as quickly as they are considered critical now, is not our Vision 2040 for the Thurston Regional Planning Council counties.

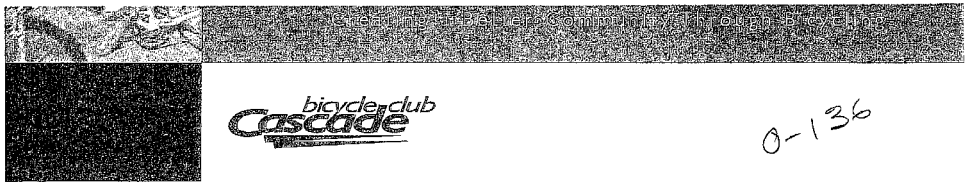
We respectfully request that you address our concerns in your Vision 2040 document. Thank you for considering our comments

Sincerely,

Sue Danver
Conservation Chair on behalf of the Black Hills Audubon Society

Cc: Doug Baker, Tumwater Manager
John Sonnen, Thurston County Long Range planner
Mike Kain, Thurston County Development Services
Jai Lyn Brown, TRPC
Thera Black, TRPC

Continuation of O-094-001



O-136

September 7, 2007

Norman Abbott
Puget Sound Regional Council
1011 Western Ave, Suite 500
Seattle WA 98104-1035

Mr. Abbott:

The Cascade Bicycle Club is pleased to submit comments on the Puget Sound Regional Council's Draft Vision 2040 Plan. On behalf of our 7,500 members in the PSRC planning area, we would like to commend the Council for its commitment to integrating what have always been inseparable issues: transportation, land use and the environment.

We appreciate your recognition that the built environment, particularly low-density development patterns made up of sprawling housing complexes, wide streets with infrequent crosswalks and strip malls surrounded by parking lots, were designed to accommodate cars, not people. Further you acknowledge that this pattern has not supported walking, bicycling, or transit, leading to an overreliance on private motor vehicles.

We have seen, firsthand, the explosive growth in bicycle transportation in the Region's Centers, where bicycle commuting is growing faster than any other mode of travel [US Census, American Communities Survey, etc.] Sadly, we have also seen that bicycling and walking continue to lose ground in those communities that insist on planning for cars instead of people. This pattern persists despite PSRC's previous Plan, Vision 2030, which directed communities away from this practice. More importantly, it leads us to our major concerns with the Vision 2040 Draft Plan.

Our most significant concern is the gap between the Plan's claims and pronouncements and its implementation. Particularly absent were accountability measures designed to compel compliance with the Plan.

O-136-001

O-136-002

O-136-003

p: 206.522.3222 PSRC Vision 2040 | Cascade Bicycle Club PO Box 15165
f: 206.522.2407 Seattle Washington 98115

O-136-001 Thank you.

O-136-002 Comment noted.

O-136-003 Comment noted. Please note that the initial monitoring provisions are meant to be a starting point.

Contained within the Land Use element of the draft Plan are numerous worthy policies. Unfortunately, we feel that there is far too much growth being projected for unincorporated areas and the region's smallest cities. Planning for nearly as much growth in unincorporated Snohomish and Pierce Counties as in the Metropolitan Cities of King County is demonstrably inconsistent with the Centers language that occurs throughout the Plan.

The Centers planning approach will be better supported by channeling significantly less growth to Unincorporated UGA, Small Cities and Rural regional geographies. Further, it will serve to protect the rural character and natural resources associated with those areas.

O-136-004

O-136-004 VISION 2040 performs better than current plans projected and does have more growth going to Metropolitan Cities, Core Cities, and Large Cities.

Likewise we have concerns about the implementation of the local land use elements. Cities throughout the region are still permitting auto-dependent cul-de-sac residential and strip retail development at an alarming rate. PSRC's proposed Action of developing a "toolbox"to assist those communities is worthwhile, but we anticipate it will have little impact without some significant inducement for communities to adopt and implement its guidance.

Without the real possibility of negative consequences, what's to keep Kitsap County or others from continuing to ignore regional growth targets or preferred development patterns?

O-136-005

O-136-005 Comment noted. See also T-Action-9.

The transportation provisions call for the region to have an integrated and sustainable transportation system that coordinates land use and transportation by serving centers, promoting economic vitality, and providing mobility options. While this is a direction that we whole heartedly support, neither the Actions outlined in the Appendix 1 nor the Monitoring and Measures in Appendix 2 appear to trigger any punitive actions against non-compliant entities.

O-136-006

O-136-006 Comment noted. See T-Action-9 and T-Action-13.

While stating that you support the adoption of a set of policies that would focus growth within existing developed areas to create compact pedestrian friendly communities, no definitive connection appears to have been made between truly complying with that policy the adopted Policy Framework for PSRC's distribution of federal funds.

Recognizing that PSRC staff review applications for Regional TIP funds with an eye toward the policies contained in Vision 2040 and its predecessors, we recommend the

(Comment continues on following page)

O-136-007

O-136-007 See sidebar on PSRC Federal Funds Competitive Process as well as the fuller discussion of this process in Part IV: Implementation. See also T-Action-13 and T-Action-14.

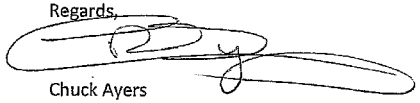
Comment Letter

following significant change to the distribution of RTIP funds, that no RTIP applications will be accepted from jurisdictions not in full compliance with Vision 2040. Further, we recommend seeking a memorandum of agreement stipulating that the state and counties will withhold transportation resources for those projects that are inconsistent with Vision 2040.

Finally, RTIP funding should be restricted to "Complete Streets." That is, those projects that meet the safety and mobility needs of all users. Three PSRC cities already require that all new and reconstructed projects meet this standard through "Complete Streets" ordinances, and numerous others are considering legislation. PSRC should acknowledge and support this trend, first spelled out in the USDOT Design Guidance, "Accommodating Bicycle and Pedestrian Travel: A Recommended Approach." [Please reference the aforementioned document for additional information.]

Thank you for the opportunity to submit our comments on the Draft Vision 2040 Plan. We look forward to its successful implementation.

Regards,



Chuck Ayers
Executive Director

Continuation of O-136-007

O-136-008

O-136-009

Response to Comment Letter

O-136-008 See T-Action-18 that addresses notification to state agencies on revised transportation funding criteria.

O-136-009 A new policy (MPP-T-14) was added to address this issue. Destination 2030 update will provide an additional opportunity to address this issue.

ECONOMIC DEVELOPMENT BOARD
FOR TACOMA-PIERCE COUNTY

O-166

September 7, 2007

Mr. Norm Abbott
Director, Growth Management
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104

RE: VISION 2040

Dear Mr. Abbott:

The Economic development Board for Tacoma-Pierce County (EDB) submits the following comments relative to the Draft Vision 2040 document.

The leaders and professional staff of the Puget Sound Regional Council are to be commended for their strong effort to create a first draft of Vision 2040 which will serve as a regional blueprint for job and population growth in the region for the next three-plus decades once it is revised and completed.

The plan's focus on concentrating growth in key cities while leaving open the possibility for balanced master-planned developments in other areas is commendable.

One major issue, however, requires a comprehensive review and change before the document is finalized. The issue at hand is the assumption in the current draft that has Pierce, Snohomish and Kitsap Counties remaining substantial exporters of workers to King County in 2040. The attached spreadsheet draws out the relevant numbers.

While the market will generally drive private employment decisions, the EDB believes that if we as a four-county region have the opportunity to really exercise "visionary"

(Comment continues on following page)

Post Office Box 1555, Tacoma, Washington 98401-1555
Phone: (253) 383-4726 Fax: (253) 383-4676 Website: www.gopierce.org

O-166-001

O-166-002

O-166-001 Thank you.

O-166-002 The housing policies in VISION 2040 are now a separate policy section. The discussion of how the Regional Growth Strategy addresses this issue was expanded. The Economy section also includes a policy that calls for incentives and investments to create a better jobs-housing balance.

Continuation of O-166-002

plans for the future – which is what this effort is all about -- we should be trying much harder as a region to incent and encourage jobs closer to where people live. The draft needs to include actionable strategies for doing just that and have those strategies reflected in the jobs/housing targets.

As the editorial page of *The News Tribune* stated (8-21-07), "Some say the market will dictate where jobs go; we can't do much about it. That is fatalistic and defeatist thinking....The goal of Vision 2040 should not be just to anticipate trends. It should be to bend and shape them. That kind of vision would make a healthier, stronger future for the region."

Sincerely,

Bruce Kendall
President & CEO
ECONOMIC DEVELOPMENT BOARD FOR TACOMA-PIERCE COUNTY

cc: EDB Executive Committee
Bob Drewel, Executive Director
Bill McSherry, Director, Economic Development

ENCLOSURES

vision 2040 draft employment data.xls

Data source: pages A-3-10 through A-3-16 of Draft Vision 2040, July 2007

employment	King	Pierce	Snohomish	Kitsap	regional total
2000	1,300,000	260,000	230,000	79,000	1,869,000
2040	2,000,000	480,000	480,000	140,000	3,100,000
growth	700,000	220,000	250,000	61,000	1,231,000
change w/in county	154%	185%	209%	177%	166%
percent of regional new jobs	57%	18%	20%	5%	
population					
2000	1,737,000	701,000	606,000	232,000	3,276,000
2040	2,461,000	1,094,000	1,052,000	381,000	4,988,000
growth	724,000	393,000	446,000	149,000	1,712,000
change	142%	156%	174%	164%	152%
percent of regional new population	42%	23%	26%	9%	

Bruce Kendall's notes:

Pierce County receives 18% of the new jobs and 23% of the new people. King receives 57% of the new jobs and only 42% of the new people. This keeps Pierce and Snohomish in the "bedroom community" to King County status. A trend that needs to be stemmed.
Like Pierce, Snohomish and Kitsap are assumed to remain large net exporters of workers to King.

Note: This page of comments does not require a response.

THE NEWS TRIBUNE

Tacoma, Washington • Established in 1883

TUESDAY, AUGUST 21, 2007

OUR VIEWS

Looking at our future three decades ahead

A regional blueprint for growth should aim to curb commute-related woes by creating more jobs outside King County.

It's not hard to imagine what the Puget Sound region will look like three decades from now. More of everything, and maybe too much.

Projections show the region will be a lot more crowded, with another 1.7 million residents living, working and commuting in Pierce, King, Snohomish and Kitsap counties by 2040. Planners believe another 1.2 million jobs will exist in the four-county region.

LEARN MORE

Vision 2040 officials will hold an open house from 4 to 7 p.m. Wednesday in the Tacoma Room of the Garretson-Woodruff-Pratt Building at the University of Washington Tacoma.

And the relationship between where people live and where they work will become a crucial factor – perhaps *the* crucial factor – that determines our quality of life.

The one thing the region doesn't need is a continuation of today's pattern of growth – more and more people commuting to jobs in King County.

That is a recipe for even worse highway traffic, more suburban sprawl, poorer air quality and loss of farmland and open space. That is not the way we want to grow.

And that is why Pierce County government officials, business leaders and ordinary citizens should pay attention to Vision 2040, a regional blueprint for growth being developed by the Puget Sound Regional Council.

The council, made up of elected city and county officials, is charged by law with laying out policies and guidelines for regional growth and development. These decisions will shape future spending on highways and other infrastructure needs.

The draft version of Vision 2040 is now out for public review and comment. One critical recommendation makes good sense: Continue to concentrate growth in our metropolitan and larger cities and discourage dispersing growth in smaller cities.

In Pierce County, the plan designates Tacoma, Lakewood, Puyallup and University Place as the cities that should absorb most future population growth. Tacoma would grow by 125,000; Lakewood and Puyallup by 75,000 each, and University Place by 30,000.

The Vision 2040 blueprint, however, projects that Pierce County would receive 18 percent of the new jobs and 23 percent of the new people. King County, meanwhile, would receive 57 percent of the new jobs and only 42 percent of the new people.

In other words, today's trend of people living in Pierce County and working in King County would continue. This is a mistake.

In the long term, the entire region will be better off if more people can work where they live. The goal should be to decrease the number of commuters as much as possible.

Some say the market will dictate where jobs go; we can't do much about it. That is fatalistic and defeatist thinking.

A smart growth plan would provide incentives to drive more job creation outside King County.

The goal of Vision 2040 should not be just to anticipate trends. It should be to influence trends, to bend and shape them. That kind of vision would make a healthier, stronger future for the region.

CHERYL DELL Publisher and president

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KIM BRADFORD Editorial writer

Note: This page of comments does not require a response.

O-174

Snohomish County EDC

September 17, 2007

Mr. Norm Abbott
Director, Growth Management
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104

Dear Norm:

Based upon the last EDD Board Meeting, the Economic Development Council of Snohomish County (EDC) would like to provide a few comments on the VISION 2040 draft document.

We understand that the kind of visionary work that goes into a plan like this requires some of the brightest leaders and staff, and we commend you for that. The EDC fully supports many of the issues in VISION 2040, such at the Growth Management Act against intrusions and erosion. However, there are some issues we would like you to consider.

When the numbers are closely examined, the Puget Sound region will grow over 166 percent in the next 30 years. The bulk of that growth will occur in King County, accounting for 57 percent of job growth and 42 percent of population growth. If housing trends continue the way that they are now, employees will continue to travel into King County for their daily commute. This may be unreasonable as space is harder to find and transportation infrastructure is already strained.

A better scenario would have businesses locating to the other three counties in the region. Workers living close to businesses would take strain off the regional transportation corridors and the environment in general. We need to take a proactive role to work with developers to show the advantages to affordable housing and to encourage local government to promote the Jobs-Housing Balance.

O-174-001

O-174-002

O-174-003

O-174-001 Thank you.

O-174-002 The Regional Growth Strategy took jobs-housing balance into consideration when distributing population and employment. Note that VISION 2040 has been revised to describe the regional allocation better. See the new policy MPP-Ec-17 and revisions to what is now MPP-Ec-20.

O-174-003 See response to O-174-002.

Many companies that have located to Snohomish County have taken this strategy upon themselves. Our local aerospace industry exemplifies this. In order to be close to their customer, many of Snohomish County's 160 supplier companies have moved into the county. For them, transporting airplane components has become easy and much less expensive. It also means that there is a pool of experienced aerospace employees in the area that will not clog up the transportation corridors.

Thank you for this opportunity to review the VISION 2040 draft document. Should you need any further assistance, please do not hesitate to call me at 425.743.4567.

Sincerely,

Deborah Knutson
President and CEO
Economic Development Council of Snohomish County
425.248.4211 or dknutson@snoedc.org

cc: EDC Executive Committee
Bob Drewel, Executive Director
Bill McSherry, Director, Economic Development

Note: This page of comments does not require a response.

O-172

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REGIONAL COUN

September 10, 2007

Mr. Norm Abbott
Director, Growth Management
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104

Dear Norm:

Following up the discussion at the last EDD Board meeting regarding the projected distribution of population and jobs in the 2040 Plan, *enterpriseSeattle* provides the following comments for consideration.

First, we understand the purpose of this discussion is to ensure that regional mobility is not negatively impacted by having an "imbalance" in projected population and job growth in the 2040 Plan. *enterpriseSeattle* agrees completely that regional mobility needs to be a very high priority in planning this region's future. To ensure that all factors affecting mobility are included, we recommend growth policies in the 2040 Plan include not just population and job projections but also assess housing growth throughout the region. It is our understanding that the 1990 VISION 2020 Plan emphasized the linkage between jobs and housing as essential for improved mobility. In the Housing Issue Paper used in drafting the VISION 2040 Plan the following recommendation is included: "For growth management planning purposes, it is also critical that, at the regional level, planning and capacity for new housing development is commensurate with projections of future job growth and resulting population growth." We agree with this recommendation and urge that housing is included in the discussion.

Second, *enterpriseSeattle* in its Five-Year Business Plan has adopted the following policies: (1) to align its work plan "with the policies and objectives of the Prosperity Partnership" and, (2) to "work collaboratively with its partners in the Puget Sound Region." These policy objectives underscore our commitment to work for the benefit of the entire Puget Sound Region since we believe the benefits of economic growth extend beyond jurisdictional boundaries. Further, we see business location decisions are "market-based" decisions driven by a number of factors. Workforce availability, housing

(Comment continues on following page)

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Development Council
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King County

O-172-001

O-172-002

O-172-001 See the expanded discussion in Part II: Regional Growth Strategy on the allocation of residences and jobs.

O-172-002 Comment noted.

affordability and regional mobility are among the most important. We think the recent announcement of Microsoft to locate 1400 jobs in downtown Seattle is a good example of this a "market-based" business decision.

Continuation of O-172-002

We thank you for the opportunity to provide input on this important matter and offer our assistance in developing good growth policy for the Puget Sound Region. If you have any questions, please call me at 206/389-8652.

Sincerely yours,

Thomas E. Flavin
President & CEO
enterpriseSeattle

cc: *enterpriseSeattle* Executive Committee
Bob Drewel, Executive Director
Bill McSherry, Director, Economic Development

Your Chamber Means Business

Everett Area Chamber of Commerce

O-149

September 7, 2007

Norman Abbott, PhD
Director of Growth Management Planning
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104

RE: Everett Area Chamber of Commerce comments on Vision 2040 SDEIS

Dear Mr. Abbott:

The Everett Area Chamber of Commerce appreciates the opportunity to comment on the Supplemental Draft EIS and Preferred Alternative for the Vision 2040 update. We commend the work of you, your staff, and the various board and committees on developing the update and the Preferred Alternative. We would like to offer the following comments for your consideration in the refinement of the final Vision 2040 Regional Growth Strategy. O-149-001

The use of the Vision 2020 strategy and concepts incorporated into the Preferred Alternative (PA) should promote a sustainable development pattern that provides a range of housing choices and job centers served by quality public infrastructure and services. We support the PA region-wide growth strategy that encourages more compact development in well designed growth centers served by a more efficient multimodal transportation system and high quality public services, while discouraging development in our pristine rural environments. O-149-002

Reinforcement of Everett's role as the metropolitan center for Snohomish County in the Preferred Alternative (PA) complements the wave of existing and planned development throughout the city including the North Marina, Baywood/JeldWen and Riverside redevelopment projects as well as numerous mixed use towers planned in the downtown core. Increased expectations for job and population growth in the PA are welcome, as long as the continued prosperity of our business community and quality of life remain paramount. Additionally, our community's ability to accommodate this swell of growth depends on our ability to leverage additional State and Federal funds for critical infrastructure projects, including but not limited to transportation, water and sewer. O-149-003

The Chamber is a strong advocate for this November's Roads & Transit ballot measure. In order for our city to accommodate the surge of growth described in the PA, high capacity transit (HCT) options should service Everett's downtown core well before 2040. At that time, service O-149-004 O-149-005

(Comment continues on following page)

2000 Hewitt Avenue Suite 205 Everett, WA 98201 phone (425) 257-3222 fax (425) 257-2074 www.everettchamber.com

O-149-001 Thank you.

O-149-002 Thank you.

O-149-003 Fiscal policies and an expanded narrative have been brought forward to the beginning of the Part III: Multicounty Planning Policies.

O-149-004 Comment noted.

O-149-005 The issue of high-capacity transit service will be considered when Destination 2030 is updated.

Comment Letter

through Snohomish County's largest employment center, the Paine Field/Southwest Everett/Boeing Manufacturing and Industrial Center, should be considered as well. Current images within the draft Vision 2040 show the future HCT corridor in perfect alignment with Interstate 5 bypassing this major MIC. We believe these depictions to be premature and inconsistent with the mobility objectives outlined in Vision 2040 and Destination 2030. In addition to HCT investments that will connect the region's metropolitan and employment centers, significant investments in conventional transit and lane capacity are necessary between Everett's northern and eastern suburbs where much of Everett's workforce resides.

We appreciate the housing policies in the SDEIS which emphasize the need to accommodate affordable housing and special needs housing across the region. Everett currently hosts a disproportionate percentage of low income and special needs households. As the metropolitan center for our county, Everett will continue that trend to a certain extent, but we hope that other cities within our county and the region will have a role in providing opportunities within their communities for affordable and special needs housing.

Thank you for the opportunity to comment on the Vision 2040 SDEIS and the Preferred Alternative. We hope our comments were helpful and well received. The Everett Area Chamber of Commerce looks forward to working with the PSRC to refine and improve the regional growth and transportation strategy. Please contact Louise Stanton-Masten, President/CEO, or Patrick Pierce, Government Affairs Analyst, if you have any questions.

Sincerely,

Louise Stanton-Masten
President/CEO

Patrick Pierce
Government Affairs Analyst

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Continuation of O-149-005

O-149-006

O-149-007

O-149-008

Response to Comment Letter

O-149-006 The decision on the final route has not been made. Maps will be revised and the route will be depicted as "to be determined."

O-149-007 Comment noted. The Destination 2030 update provides an opportunity to address this issue further.

O-149-008 Thank you.

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O-104

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September 6, 2007

Mr. Norman Abbott
PSRC SEPA Responsible Official
1011 Western Avenue
Suite 500
Seattle, WA 98104

RE: Comments on Draft Vision 2040

Dear Mr. Abbott:

We appreciate the hard work of staff and elected officials of the Puget Sound Regional Council to update, improve and strengthen the regional plan for this area. Futurewise is a statewide public interest group advocating wise land use planning, to protect working farms, forests and natural areas, while making cities and towns great places to live and work. We value the opportunity to comment on Vision 2040 and we commend PSRC for the many forward-thinking aspects of the plan. **Among the most significant policies that we applaud:**

- Clear, strong environmental policies with a sustainability emphasis, a regional scope, and specific commitments to numeric goals for air and water quality.
- Inclusion of climate change policies, and related land use and transportation policies, that clarify the important role the regional plan must play in addressing this growing threat.
- Establishing a regional role for the PSRC in setting growth targets, adjusting Urban Growth Areas, monitoring affordable housing, and establishing Transfer of Development Rights—all of which strengthen the region's ability to achieve the goals of Vision 2040.
- Clarification that rural areas, as well as resource lands, are an important and permanent part of the region's desired future; we strongly concur, for both environmental and quality of life reasons.
- Stronger emphasis on urban quality and wonderful central places, important to achieve economic development goals as well as land use pattern goals.
- Numerous actions and policies for improved bicycle and pedestrian travel systems, improved transit service, and vehicle trip reduction—all essential to providing travel choice and convenience, and reducing harmful pollutants and emissions.
- Excellent organization and graphics that improve the clarity of the plan, ensuring it will be easier for both existing and future elected officials and citizens to understand and use. Kudos for the overall description of the vision on page 13, plus the sidebars linking the plan to other state and regional plans, the many sidebars providing information supporting plan approaches, and the glossary of terms—all enable citizens as well as elected officials to participate in plan implementation.

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Futurewise also has some serious concerns about the proposed plan, and urge you to address the issues identified below, prior to completion of this update.

1. Land Use Pattern Issues: Urban Areas

The policies and actions in Vision 2040 do not provide an adequate framework to ensure that sufficient growth is accommodated in designated regional growth centers and secondary centers, per the overall growth strategy of the Vision. As described on page 39, "the development of centers lies at the heart of Vision 2040…They are locations identified to take a greater proportion of future population and employment development in an effort to curb sprawl…" Centers should be compact and walkable, providing a mix of uses, proximity to services and jobs, and ready access to high capacity transit service. We applaud the centers strategy, but find the policies and actions insufficient to carry it out.

O-104-001

To truly achieve these goals, the following policies and actions are necessary:

a) **Establish minimum <u>average</u> residential densities** for urban areas and designated regional growth centers to ensure that land resources are used efficiently and to promote compact and walkable communities that can be efficiently served by transit. Minimum <u>average</u> residential densities should be no less than 8-12 units per acre for urban areas and no less than 15-20 units per acre for designated regional growth centers.

O-104-002

b) **Maximize potential for transit-oriented development** around major transit nodes, including existing and planned light and commuter rail station areas. Planning and zoning for TOD must accompany all high capacity transit investments. Where they are not already within designated regional growth centers, high-capacity transit areas should be considered de facto secondary centers and should accommodate a higher proportion of regional growth.

O-104-003

c) **Ensure that the demand for low-income, moderate-income and special needs housing is met** by *directing* cities to develop more flexible zoning codes to encourage a greater range of housing options and by linking infrastructure funding to meeting affordable housing targets.

O-104-004

d) **Establish a sub-regional jobs/housing balance goal** based on an 8-mile commuter radius (or other size that seeks to reduce the Census average work trip length) and develop multicounty and county level policies and actions to achieve the desired jobs/housing balance goal.

O-104-005

2. Land Use Pattern Issues: Rural Areas

Growth in rural areas is excessive; Vision 2040 must include stronger policies and actions to reduce the amount of growth in rural areas, and in free standing cities within rural areas. The plan, page 19, indicates that rural areas will receive 19% of Kitsap County's population growth, and 10% of Snohomish County's growth. The percentages in King and Pierce counties are smaller, but the rural areas of the two combined will be adding 44,000 people. As a result of this much growth outside of urban areas, the SEIS shows more

O-104-006

(Comment continues on following page)

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O-104-001 Both the policies and actions have been strengthened in response to the public review process. However, it is designed to provide regional guidance to many other actors that play important implementation roles.

O-104-002 This idea was considered in the VISION process and not accepted. However, the VISION 2040 narrative have been revised and a sidebar added.

O-104-003 VISION 2040 narrative was revised to address this issue.

O-104-004 Issue best addressed at the local jurisdiction level. VISION 2040 has expanded the narrative on the role of local government.

O-104-005 VISION 2040 was revised to include additional jobs/housing provisions.

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growth in vehicle miles traveled and emissions than is desirable, and less proximity to transit. Under this policy approach, rural areas continue to be transformed into low density suburbs rather than working farms and forests. The projected growth is lower than the baseline Growth Targets Extended, but still too high to be consistent with the other Vision 2040 goals and policies, which call for long term protection of rural and resource lands. The numbers likely reflect the difficulty of changing past trends, but King County is a good example of what can be done: King County has the least projected rural growth, even though it has the greatest overall projected population growth.

Continuation of O-104-006

Goals and policies to reduce growth in rural areas should be strengthened in the following ways:

a) **Clarify the meaning of Vision 2040 projections to ensure that rural area numbers are not considered "targets" or goals to be achieved, but rather growth caps;**
b) **Strengthen incentives proven to reduce rural area and natural resource lands growth, such as transfers and purchase of development rights;**
c) **Eliminate policies in Vision 2040 that allow road capacity expansion in rural areas;**
d) **Eliminate the policy allowing Fully Contained Communities as free standing urban areas; and**
e) **Include policies to monitor rural growth, and to ramp up incentives and disincentives if monitoring indicates that rural growth numbers will actually meet or exceed SEIS projections.**

O-104-007
O-104-009
O-104-008
O-104-010
O-104-011

These policies and actions are necessary to shape growth patterns, consistent with Vision 2040 and the Growth Management Act, and to reduce emissions, consistent with new state law SB 6001.

O-104-012

3. Transportation Issues

The transportation related policies must be strengthened and clarified to provide adequate direction to the update of the Regional Transportation Plan, Destination 2030. New policies are essential to ensure the RTP update will emphasize programs, facilities and investments consistent with the land use, mobility and climate change policies of Vision 2040, as well as new state legislation (SB 6001) and the Growth Management Act. The SEIS indicates that, under Vision 2040, VMT will increase by 50%, due both to growth and continuing non-urban development. Federal studies estimate that VMT in Washington State has actually declined over the past four years, indicating that an overall decline is an achievable goal. A combination of land use and transportation policies is needed to meet statewide VMT reduction goals and climate change goals.

O-104-013
O-104-014

To correct past trends, the plan must, at a minimum:

a) **Include strong policies to use transportation pricing tools that will reduce trip demand on the regional system, help fund alternative travel modes on the regional system, reduce congestion, and fund maintenance and safety improvements;**

O-104-015

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O-104-006 The Regional Growth Strategy numbers for rural represent a substantial reduction over current trends. VISION 2040 has been revised to clarify that those numbers are maximums and less growth would be better.

O-104-007 Concur. This clarification was added as a revision to VISION 2040.

O-104-008 VISION 2040 has been revised to address this issue. See what is now MPP-DP-26 in the final document. Provisions for rural areas and resource lands have been clarified.

O-104-009 This idea was considered in the 2040 VISION process and the language was kept as written.

O-104-010 This idea was considered in the VISION process and the language was kept as written.

O-104-011 Tracking growth is a part of the VISION 2040 monitoring program. Specific disincentives were not included.

O-104-012 Concur.

O-104-013 VISION 2040 has been revised to address this issue, with stronger policies and narrative related to the linkage between land use, transportation, and climate change. The Transportation section now has a subsection entitled "Sustainable Transportation" that includes policies that address transportation and the effects of emissions. Also, the Destination 2030 update will provide an additional opportunity to further address this issue.

O-104-014 VISION 2040 has been revised to address this issue. See what is now MPP-En-20 in the final document that responds to RCW 80.80.020.

O-104-015 VISION 2040 has been revised to address this issue. See MPP-T-24, a new policy in the final document that addresses increasing trips made by alternatives to driving alone. Also, the Destination 2030 update will provide an additional opportunity to address this issue.

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b) Include strong policies supporting investments that result in emissions below 1990 levels, as required by state law; and
c) Set specific trip and VMT reduction goals consistent with state law. O-104-017

O-104-016

The transportation policies as drafted do not adequately set priorities for investments to support the least polluting types of travel; nor do they specify the required reduction in VMT that is necessary to meet state laws on energy and address climate change. Although the plan, as modeled, produces better results than baseline (Growth Targets Extended), it performs more poorly than existing conditions because it provides for continued sprawl, excessive growth in rural areas and freestanding cities, and a continued imbalance of jobs and population. These all result in VMT growth, as opposed to the VMT reductions that are needed. The plan also implies that there will be funding to add capacity in both urban and rural areas, and in every mode, when in fact the region cannot count on enough funding even to maintain existing roads and bridges. Fixing what exists must take priority over new facilities in every mode. O-104-018 O-104-019

A final recommendation would be to add a sustainability goal as an overall driving principle for Vision 2040, rather than including such a concept only in the environmental and transportation sections. A policy calling for considerations of natural, fiscal and social justice sustainability should govern all policy and action in Vision 2040. O-104-020

Please see the attached "Detailed Issues Listing" for more in-depth discussions of the recommendations listed above, as well as additional suggestions that would make Vision 2040 more meaningful and usable for citizens and public officials.

Thank you for the opportunity to comment on this important plan. Futurewise would welcome a chance to meet with PSRC staff and policy boards to clarify our comments and the rationale for proposed policies. We are also working with other public interest groups to further the state and region's land use and climate change goals.

Please contact us at Futurewise for more information or to arrange a meeting.

Sincerely,

Aisling Kerins, Interim Executive Director
206-343-0681 x115
aisling@futurewise.org

Sara Nikolic, Urban Strategies Director
206-343-0681 x112
sara@futurewise.org

cc: Futurewise Board of Directors
Encl: Detailed Issues Listing, 12 pages

Futurewise Comments on Draft Vision 2040, Cover Letter - September 6, 2007 - Page 4/4

814 Second Avenue, Suite 500 Seattle, WA 98104 www.futurewise.org phone 206 343 0681 fax 206 709 8218

O-104-016 VISION 2040 has been revised to address this issue. The Transportation section now has a subsection entitled "Sustainable Transportation" that includes policies to address transportation and the effects of emissions. MPP-En-20, a new policy in the final document, addresses meeting the state's goals and addresses RCW 80.80.020.

O-104-017 VISION 2040 has been revised with a new policy related to increasing non-single occupancy vehicle trips. Also, the Destination 2030 update will provide an additional opportunity to address this issue.

O-104-018 VISION 2040 has been revised to address this issue, with stronger policies and narrative related to transportation and the environment. The Transportation section now has a subsection entitled "Sustainable Transportation" that includes policies that address transportation and the effects of emissions.

O-104-019 VISION 2040 has been revised to address this issue.

O-104-020 VISION 2040 has been revised to address this issue. The concept of sustainability has been brought forward in the Environmental Framework and is now woven throughout VISION 2040 as an important thread that ties together the environment, land use, transportation, and the economy as interrelated components that shape our quality of life.

Futurewise Comments on Draft Vision 2040
September 6, 2007

Detailed Issues Listing

Provided below is an in-depth explanation of the primary recommendations discussed in the cover letter, as well as additional suggestions that would make Vision 2040 more meaningful and usable for citizens and public officials. Comments have been organized into five sections:

1. *Land Use Pattern Issues, Urban Areas (pages 1-4)*
2. *Land Use Pattern Issues, Rural Areas (pages 4-6)*
3. *Transportation Issues (pages 6-11)*
4. *Climate Change Issues (page 11)*
5. *Environmental Issues (page 12)*

1. LAND USE PATTERN ISSUES – URBAN AREAS

The text, goals and policies that pertain to urban land use patterns describe a commendable centers strategy to development and accommodation of growth that we fully endorse. However the strategy would be strengthened and more meaningfully applied if Vision 2040 included the following policies and actions. O-104-021

Page 37, Goal to conserve natural resource land permanently. The goal states that "the region will conserve its natural resource land permanently," however the listed multicounty planning policies provide no directive that would guarantee *permanent* protection of resource lands. The Action section does include language about creating a "regional strategy" for TDR and PDR programs, each of which could conserve land in perpetuity, however, there is no action for the explicit implementation of said programs, nor any stated goals or measurements for actual acres protected. Similarly, MPP-DP-43 in page 54 states that the plan should "encourage" the use of TDR, but does not make implementation explicit, nor does it clearly designate the role of PSRC. **The Action section and MPP-DP-43 should be amended to state that PSRC will *adopt* and help *implement* regional TDR and PDR programs, and that PSRC will monitor the programs by tracking acres protected in the resource lands. In addition, it should be explicitly stated that well-designed and implemented TDR programs address the dual fundamental regional goals of conserving resource lands and accommodating growth in urban centers. Accordingly, it should be explicitly stated that municipalities providing viable receiving sites for a local or regional TDR program should receive funding priority for both transportation infrastructure and economic development dollars (similar to language used in MPP-DP-11).** O-104-022 O-104-023 O-104-024

O-104-021 Comment noted.

O-104-022 Issue best addressed at the local level.

O-104-023 Comment noted.

O-104-024 This idea was considered in the VISION 2040 process and the language was kept as written.

Pages 40-43, Description, goals and policies for "Centers." This section would be clearer and more usable if the text (page 40), the chart (page 41) and the goals and policies (page 43) used consistent language regarding center types. The text describes four center types, and the chart provides the broader categorization of "Regional Growth Centers" and "Other Centers." The goals and policies, however, pertain to "Designated Regional Growth Centers" and "Secondary Centers." It should be made clear in the text and chart that Secondary Centers could exist in any of the four center types mentioned on pages 40-41. In addition, it would be useful to give further explanation of the purpose of Secondary Centers (to promote mixed use communities with non-motorized access to shopping and entertainment, and to create a collection node for transit) and should provide data on how these centers currently perform. MPP-DP-16 should not seek "compatibility in the region" for the designation of Secondary Centers, but should rather strive to designate Secondary Centers as a means to implement the overall vision and achieve the purposes (stated above) of smaller centers. O-104-025 O-104-026

Page 43, Goal for designated regional growth centers. The goal should explicitly state that regional growth centers will promote compact, pedestrian-friendly, mixed-use, transit-oriented development, consistent with the text describing Urban Regional Geographies and Their Centers (page 39) and similar to the final sentence of the following goal for secondary centers. O-104-027

Page 43, MPP-DP-11. The policy states that designated regional growth centers should receive funding priority for transportation infrastructure and economic development dollars; however, the associated Action in the appendix only discusses priority applied to "additional funding mechanisms." **The policy should be amended to state that designated regional growth centers should receive priority for *existing* as well as *additional* sources of funds.** O-104-028

Page 43, Goals and policies for designated regional growth centers and secondary centers. While the goals for centers (page 43) and the text describing centers (pages 39-41) emphasize transit mobility and transit-oriented development (TOD), there is no associated multicounty planning policy or action to direct TOD in centers. **Promoting TOD is integral to the centers strategy of the Vision, and warrants explicit direction in the policies and actions. Policies and actions should include:** O-104-029

- **A stated MPP that current and planned major transit areas should accommodate additional growth through TOD, consistent with the centers strategy of the Vision, by providing incentives and regulations that encourage compact walkable communities, residential densities of at least 15-20 units per acre, flexibility in housing types to accommodate a range of incomes and needs, and a broad mix of uses;**
- **A stated MPP that planning and zoning for TOD must accompany all high capacity transit investments (including light rail, commuter rail, ferry terminals, and major bus transit centers);** O-104-030
- **Where they are not already within designated regional growth centers, high-capacity transit areas should be considered de facto secondary centers and should accommodate a higher proportion of regional growth;** O-131-031
- **A stated Action that PSRC, in cooperation with its members, will conduct an inventory of current land uses and zoning within ½ miles of all current and planned** O-104-032

(Comment continues on following page)

O-104-025 VISION 2040 has been revised to address this issue. The narrative and table describing centers is now clearer, the goal for other centers is more specific, and the policies regarding regional growth centers, manufacturing/industrial centers, and other centers have been clarified with regard to funding prioritization.

O-104-026 VISION 2040 has been revised to address this issue. The narrative and table describing centers is now clearer, the goal for other centers is more specific, and the policies regarding regional growth centers, manufacturing/industrial centers, and other centers have been clarified with regard to funding prioritization.

O-104-027 VISION 2040 has been revised to address this issue.

O-104-028 The policy has been revised to clarify funding prioritization.

O-104-029 VISION 2040 narrative was revised to address this issue.

O-104-030 This idea was considered in the VISION 2040 process and the language was kept as written.

O-104-031 This idea was considered in the VISION 2040 process and the language was kept as written.

O-104-032 Issue best addressed at the local jurisdiction level.

major transit nodes and develop of concrete policy recommendations, both incentive-based and regulatory, to maximize TOD potential in those communities. See also the discussion of TOD in comments on MPP-T-9 under Transportation Issues below.

Continuation of O-104-032

Page 44, MPP-DP-18. The associated Action should provide additional direction for creating "vibrant sustainable compact urban communities that provide diverse choices in housing types". On page 49 in the Housing section, the description under "Diversity and Innovation" does a superb job of explaining that a diverse housing stock offers "greater affordability and promote[s] more efficient use of land." To that end, **policies and actions should direct cities to develop more flexible zoning codes to allow a diverse array of compact housing options in multifamily and single family zones, including cottage housing, attached single family townhouses and row houses, and both attached and detached accessory dwelling units.**

O-104-033

O-104-033 Issue best addressed at the local jurisdiction level.

Page 44, MPP-DP-19. The policy to promote "transformation of key underutilized lands to high-density mixed use areas" is commendable, but requires further detail and direction. **Given the shortage of buildable land for housing, minimum average residential densities should be established to ensure that land is developed in an efficient manner that furthers the growth strategy of the Vision.** The State of Oregon and Portland Metro achieve minimum residential densities through several mechanisms that would be useful models for policies and actions in Vision 2040. These include:

- Metro cities must "designate sufficient buildable land to provide the opportunity for at least 50 percent of new residential units to be attached single family housing or multiple family housing or justify an alternative percentage based on changing circumstances." [OAR 660-007-0030]. A similar policy for Vision 2040 would encourage better utilization of buildable lands.
- Metro cities must achieve a designated minimum residential density (ranging from 6-10 units per acre, depending on a variety of community characteristics) for all new development [OAR 660-007-0035]. **Similar minimum average residential densities should be developed for Vision 2040 cities. Minimum average densities should be no less than 15-20 units per acre for urban centers and no less than 8-12 units per acre for all other urban land.**
- All new residential development must develop at no less than 80% of the allowed density for the zone. [Individual policies adopted by each of the 24 Metro cities.] **A similar policy should be included in Vision 2040 to prevent the underdevelopment of buildable lands.**

O-104-034

O-104-034 This idea was considered in the VISION 2040 process but the language was kept as written. However, the narrative was added to state the benefits of density.

O-104-035

O-104-035 This idea was considered in the VISION 2040 process and the language was kept as written.

O-104-036

O-104-036 This idea was considered in the VISION 2040 process but the language was kept as written. However, the narrative was added to state the benefits of density.

Page 45, Goal and MPP-DP-22. Allowing incorporations of new cities is detrimental to the growth strategy and should be strictly prohibited. All urban unincorporated land should be annexed into adjacent cities. New development, particularly new residential subdivisions and commercial development, in the unincorporated areas should not be allowed prior to annexation to ensure application of full urban development standards and provision of adequate infrastructure to accommodate the new development.

O-104-037

O-104-037 Comment noted.

O-104-038

O-104-038 This idea was considered in the VISION 2040 process and not accepted.

Page 48, Chart. Label the X and Y axes on this chart so that its information can be more meaningfully conveyed and applied.

O-104-039

O-104-039 VISION 2040 has been revised to address this issue. The charts, maps, tables, illustrations, and other graphics have been reworked for accuracy and readability.

Pages 49-51, Jobs/housing balance. There is a good discussion of housing supply, location and affordability issues in the text on pages 49-50, including a stated goal of adding a mix of housing to job-rich areas, but the policies do not ensure an adequate jobs/housing balance in the region. Additional policies should include:

- **Countywide policies to set targets for a sub-regional jobs/housing balance based on a reasonable commuting radius, such as the Census average work trip length. Policies should strive for a reduction of work trip length;**
- **Housing types should match the job targets within each sub-region, and provide for the existing, maturing population to age in place;**
- **Local zoning requirements should encourage smaller units in and near job centers by focusing on bulk and scale rather than number of units, reducing required parking, and allowing for off-site parking to substitute for in-building parking;**
- **Compliance review of 2010 comprehensive plan updates should ensure the combination of zoning and incentives will produce the desired jobs/housing balance;**
- **PSRC should establish a jobs/housing balance goal, such as 1 dwelling unit for every 1.25 jobs within an 8 mile radius.**

O-104-040 VISION 2040 has been revised to address this issue. An additional jobs-housing balance policy has been added.

O-104-041 Issue best addressed at the local jurisdiction level.

O-104-042 Issue best addressed at the local jurisdiction level.

O-104-043 VISION 2040's population and employment distribution is at the regional geography level.

O-104-044 Specific dwelling unit to jobs ratios are too detailed to be appropriate in a vision document.

Page 51, MPP-DP-31. As stated in the comment on MPP-DP-18 above, policies and actions should promote the diversity and innovation described in the text on page 49. **In order to meet the demand for a greater range of housing types that would be affordable to a greater range of incomes, cities should develop more flexible zoning codes to allow a diverse array of compact housing options in multifamily and single family zones, including cottage housing, attached single family townhouses and row houses, and both attached and detached accessory dwelling units.**

O-104-045 VISION 2040 has been revised to address this issue. See policy MPP-H-8 and amended actions.

Page 51, MPP-DP-31-37. Need to rewrite MPP-DP-32 to make clear that cities should not merely provide an "adequate supply" of affordable housing, but should rather meet the *demand* for affordable housing. **Recommended revision is: "Achieve and sustain—through preservation, rehabilitation and new development—housing to meet the demand of low-income, moderate-income and special needs populations that is equitably and rationally distributed through the region and provided within a commuting distance of job centers." In addition, communities that are meeting the demand for affordable housing and/or are achieving a desired jobs/housing balance should receive highest priority for funding for transportation facilities, infrastructure and services. Conversely, those communities not meeting their housing targets and jobs/housing balance should have reduced eligibility for funding.**

O-104-046 VISION 2040 has been revised to address this issue.

O-104-047 Comment noted. See Housing policy section, in particular the new policy MPP-H-8.

Page 54, MPP-DP-43. See comments on page one pertaining to strengthening language to implement a regional TDR program and define PSRC's role in monitoring the program.

2. LAND USE PATTERN ISSUES - RURAL AREAS

The goals for rural areas and the text discussion are strong statements of the importance of the rural areas of the region, for a variety of values. We support the overall approach, but urge a

O-104-048 The rural provisions in VISION 2040 have been revised.

(Comment continues on following page)

number of edits and policy shifts to both clarify regional intent, and to ensure policies can be implemented.

Continuation of O-104-048

Page 16, Small Cities. The text implies that small cities must accommodate 9% of population growth. This is likely just and editorial issue, but should be amended. Since 20 of the small cities are free standing cities within rural areas, text should be clarified to express Vision 2040's intent, which is that 'no more than' 9% of population growth would be in small cities, and even less in the 20 free standing cities. The job growth numbers might be a valid goal (i.e. target), if needed to provide local jobs and services to existing rural populations. Another improvement would be to add a different category for the free standing cities, so policies can vary. Growth in the free standing cities has more onerous impacts than growth within small cities within urban areas. For example, growth along the Highway 2 corridor reduces freight capacity, and highway expansions there incur environmental damage that is nearly impossible to mitigate.

O-104-049

O-104-050

Page 39, Targets. This text section on the meaning and use of targets needs to be clarified to be consistent with Vision 2040 goals. A target can be a minimum or a cap, depending on the policy. Also, **it is very important to recognize that targets for subareas of any county are goals, not forecasts. Vision 2040's intention is to change the location of forecast growth, to better meet goals, rather than to passively accept a continuation of past trends. Finally, targets are not merely a means of assuring fair share growth accommodation, as the text on page 39 implies, but a way to put numbers to policy goals.** It is commendable that Vision 2040 envisions a leadership role for PSRC in setting targets, but therefore it is essential that this text, and other text sections, clarify the purpose of setting targets, and distinguish the meaning of targets from growth forecasts.

O-104-051

Page 44, Cities in Rural Areas. Text in this section does a good job of describing the desirable role of cities in rural areas. **The text describing the role of these cities should be transformed into policy, and the new policy should indicate that population growth in the free standing cities should be limited, that commercial/industrial job growth there will be local services and resource based, and that new population and jobs should be accommodated through intensification rather than conversion of nearby rural lands.** The development patterns in some of the cities in rural areas is beginning to duplicate low density suburban sprawl, rather than the walkable/bikable development patterns of historic Enumclaw, North Bend and Snohomish. **A policy is needed to specify that the development patterns in the cities in rural areas should mimic past, more efficient rural patterns of small lots, commercial clusters, and denser housing in and adjacent to the town centers.**

O-104-052

O-104-053

MPP-DP-26 and 27, Fully Contained Communities. Futurewise concurs with policies that would discourage new Fully Contained Communities. Allowing FCCs is in direct conflict with policies to conserve rural lands, and to invest in urban areas. The experience in King County with Redmond Ridge and Issaquah Highlands indicates that this development pattern produces more harm than benefit. Public subsidies were required to provide roads linking the FCCs to the contiguous urban area, diverting that funding from under-funded capital and maintenance projects in existing urban areas. Traffic through rural areas between the FCCs and the contiguous urban area is noisy and dirty, and interferes with rural activities; and the development

O-104-054

(Comment continues on following page)

O-104-049 VISION 2040 has been revised to address this issue.

O-104-050 The Small Cities are divided into three categories to better understand the differences within the Small Cities' regional geography. Free-standing cities are one of these three categories.

O-104-051 VISION 2040 has addressed this issue. See the revisions in Part II: Regional Growth Strategy.

O-104-052 The issue is adequately addressed. Also, the amount of growth in the Small Cities' regional geography is addressed in the Regional Growth Strategy.

O-104-053 The narrative was revised in VISION 2040 to address this issue.

O-104-054 This issue was considered and the policies have been amended slightly to discuss new fully contained communities (FCCs).

pattern encourages developers and landowners to assume that the lands between the FCCs and the urban area will eventually be converted to more intensive zoning. Such assumptions lead to disinvestment in small farms and woodlots, and encourage pressure for UGA expansions.

Continuation of O-104-054

Vision 2040 policies should be changed to prevent further FCCs in this region. At a minimum, criteria should be added to limit negative impacts. Such policies should include policies preventing public dollars for infrastructure, policies requiring that FCCs buy development rights so that there is no net increase in growth outside the contiguous urban area, and policies requiring that FCCs do not increase emissions or VMT as a result of siting.

O-104-055

O-104-055 See response to O-104-054.

MPP-DP-28, Rural Development. This policy should be strengthened to reduce the amount of rural growth. **Policies should require all counties to implement transfer and purchase of development rights; to lower zoned densities and require lot combinations; and to prohibit new individual wells and septic systems for any new lots smaller than 10 acres in size, as well as in areas where lot combinations are still possible.**

O-104-056

O-104-056 Comment noted.

A new policy should be added to monitor growth in rural areas, and to call for stronger action if growth is close to meeting or potentially exceeding projections. Policies to slow rural growth are essential to achieve transportation and climate change goals, as well as to conserve rural lands and activities.

O-104-057

O-104-057 VISION 2040 has been revised to add a new policy that does not allow for urban densities in rural and resource lands. There are also provisions related to monitoring growth in all of the regional geographies.

Page A-2-4, Actions and Monitoring. Monitoring of development activity is good, but another useful measure would track the number of acres permanently preserved through acquisition, purchase or transfer of development rights, and acquisition of major conservation easements, or other permanent protections. The larger jurisdictions would find it relatively easy to report these numbers, which would be a good indication of progress toward permanent protection.

O-104-058

O-104-058 The monitoring program in VISION 2040 is a starting point. An action has been added that calls for establishing a team to work on additional ways to track progress.

O-104-059

O-104-059 Comment noted.

3. *TRANSPORTATION ISSUES*

The transportation section of the plan includes useful data and discussion about transportation challenges the region faces, as well as the funding, fuel, social equity and environmental bases for changing our transportation system. However, the transportation policies do not fully reflect the recognition that a dramatic change is required to meet multiple Vision 2040 goals and state laws. Text in the plan describes numerous improvements needed to make our transportation system truly equitable and useable for all, describes funding shortfalls, and describes the benefits of short trips, mass transit, walkability/bikability and emission reductions. However, not enough of the explanatory text is incorporated into policy, and, as such, the policies do not provide adequate guidance to ensure the update of the Regional Transportation Plan, Destination 2030, will implement Vision 2040 or meet state goals.

O-104-060

O-104-060 VISION 2040 has been revised to address many of these issues. The goal for the subsection "Maintenance, Management, and Safety" now states: "As a high priority, the region will maintain, preserve, and operate its existing transportation system in a safe and usable state." Furthermore, the narrative throughout the Transportation section has been revised.

Page 66/67: Maintenance, Management and Safety

Policies should be revised to stress that maintenance, management and safety investments in each mode will take priority over new transportation capacity, except for capacity improvements in travel systems that reduce vehicle miles traveled (VMT), pollutants and

O-104-061

O-104-061 VISION 2040 has been revised to address this issue. See revisions to the transportation goal and narrative related to maintenance.

(Comment continues on following page)

emissions. The text includes a good discussion of how a conservation and management strategy can improve our transportation system, referring also to the very limited funds available for any kind of transportation improvement. The plan wisely includes a policy to use management to reduce the need for new capital improvements. However, without setting a clear priority for funding, the plan allows investments in new capacity to be evaluated as equally important to safety investments. This appears, then, as a 'something for everyone' approach that thwarts goal achievement. **In addition to strengthening the policy, a sidebar clarifying the existing shortfall in maintenance and safety funding would be helpful; the lack of funding for making our bridges safe would be a good example.**

Continuation of O-104-061

O-104-062

Pricing policies should be added to ensure that pricing will be employed throughout the region to achieve a number of benefits, including: manage demand, fund maintenance, fund more efficient transportation systems, including systems that serve non-drivers. Text in Vision 2040 makes the case for pricing as a way to meet goals, but the policy is missing, and essential. Pricing should include tolls as well as parking charges.

O-104-063

A policy should be added to direct the RTP to require strengthened commute trip reduction programs appropriate to each county, and to include a broader number of employers and work sites, including schools. The policies should include upper limits on parking for employment centers, and required parking charges for daylong parking in parking facilities. Trip reduction and VMT data from the region's current CTR efforts show that millions of vehicle miles have been reduced already, even though only the larger employers must comply. Outstanding success stories, such as vehicle trip reduction by Safeco and CH2MHill, show what is possible on a voluntary basis (these and other companies went further than what CTR laws require). Some cities have instituted parking limits or parking pricing requirements, but these have limited effectiveness on a city by city basis. A recent article by Dr. Larry Frank (in *Planning* magazine) indicates that even with heroic technological improvements in fuel type and efficiency, we will still need dramatic trip and VMT reductions to reduce emissions below 1990 levels, as required by state law.

O-104-064

O-104-065

A policy should be added requiring counties to develop access management plans, in cooperation with WSDOT as appropriate, to improve safety and to eliminate individual lot access to regional and state roads, and thereby conserve through movements. It is particularly important to conserve the through capacity of the regional system in rural and unincorporated urban areas, by calling for counties to develop access plans for all undeveloped parcels, such as planning for frontage roads and joint access serving multiple parcels.

O-104-066

Page 67/68: Supporting the Growth Strategy

Futurewise supports many of the new policies focusing on greater mobility through less polluting modes, such as walking, biking and transit. Policy MPP-T-9, setting priorities for investment, and the policies aimed at improving transit, walking and biking systems, are good additions, and reflect healthy new directions in transportation planning for this region. The fact that approximately 1/3 of the region's population does not drive, because of age, choice, or limitations, argues for a system that is based less on auto travel. The policies must be

O-104-067

(Comment continues on following page)

O-104-062 VISION 2040 discusses tolling and pricing strategies. The Destination 2030 update will provide an additional opportunity to address this issue.

O-104-063 The update of Destination 2030 provides an opportunity to address this issue in more detail.

O-104-064 VISION 2040 includes a Transportation action specifically to address commute trip reduction. The update of Destination 2030 provides an additional opportunity to address this issue in more detail.

O-104-065 Issue best addressed at the local jurisdiction level.

O-104-066 The Destination 2030 update will provide an opportunity to address this issue.

O-104-067 Revisions have been made throughout the Transportation section to strengthen the policies and narrative related to transportation, health, and climate change. For instance, the Transportation section now has a subsection entitled "Sustainable Transportation" that includes policies that address transportation and the effects of emissions. For instance, see new policy MPP-T-14. Also, the Destination 2030 update will provide an additional opportunity to address this issue.

strengthened, however, to fully achieve Vision 2040's emphasis on reducing pollution and greenhouse gases, and conserving rural and resource lands.

The overall goal for this section should be revised to reflect other goals and policies in the plan that address trip reduction, health and climate change. Transportation investments should be prioritized/emphasized to enable less polluting travel options to and within centers as more important than just connecting them, especially if such connections result in expanded roadways that increase VMT. Potential replacement: The future transportation system will support the regional growth strategy, focusing on those mobility and access improvements, within and between centers, that promote trip reduction and reduced emissions, and that reduce reliance on fossil fuels. The language in the sidebar on the funds competitive process is actually clearer than the draft goal, as it focuses on more than just connecting centers; these concepts should be transformed into policy. Vision 2040 must not imply that the region can continue to support all modes equally, and still expect to meet its climate change, mobility and land use pattern goals. As a region, investments need to focus more on encouraging efficient short trips (up to 5-8 miles, the most typical commute and non-work trips).

A new policy should be added to clarify that all new facilities and capacity improvements will be funded through revenues generated by a combination of fees most approximating user charges. Given the ongoing inability of the state and region to fund maintenance, much less new capacity, the region should employ user fees such as sales taxes on gas, new development impact fees, and road use fees to fund the desired regional system, as well as to provide incentives for the most efficient modes of travel.

Page 68, MPP-T-9. The policy should be expanded to also state that funds for any new high capacity transit stations or stops will only be allocated if there is a local land use plan and local incentives in place to promote mixed uses and transit supportive densities (15 to 20 units/acre average densities) within ½ mile. The sidebar on transit-oriented development on page 67 describes the benefits of transit oriented site developments, and the sidebar on page 70 on transit supportive densities sets appropriate minimums that should be included in policy. Since there will be some new stops and stations provided as high capacity transit expands, the region needs policy to ensure that these will not be located in low density or auto only locations. The Bellevue and Renton transit centers are good models for the region. Regional funds should not be used to invest in "park and ride only" stations or stops, even though parking structures might be a first step leading to a mixed use stop.

A new policy should be added to clearly state that there will be no new road capacity for regional roads in and through rural and resource lands. Improvements in and through rural areas should be limited to safety improvements, such as turn lanes, roundabouts, shoulders, walking paths and bike lanes, as well as maintenance. Given goals of trip reduction, and limited future oil supplies, it is very short sighted to anticipate investing in new capacity when funds are too limited to even maintain/replace facilities in urban areas, and when Vision 2040 clearly states that growth in rural areas is to be more limited. The RTP map on page 65 shows many new facilities and major widening in rural areas. Therefore, it is essential that the Vision 2040 document include enough direction to revise the RTP when it is updated next year.

Continuation of O-104-067

O-104-068

O-104-069

O-104-070

O-104-071

O-104-068 VISION 2040 has addressed this issue, with a Regional Growth Strategy that promotes a closer balance between housing and jobs — in part to shorten trips and commuting distances. The Transportation section now has a subsection entitled "Sustainable Transportation" that includes policies that address transportation and the effects of emissions. See MPP-T-24, a new policy that addresses increasing travel by modes that are alternatives to driving alone.

O-104-069 The Destination 2030 update will provide an opportunity to address this issue.

O-104-070 Comment noted. VISION 2040 includes an action to update criteria for programming and project selection.

O-104-071 VISION 2040 has been revised to address this issue. This policy has been rewritten to be clearer about the conditions under which new or expanded roads in rural areas or resource lands are appropriate. See what is now MPP-T-28 in the final document.

Vision 2040 text in several sections points out that concentrated mixed use land use patterns are the best way to eliminate vehicle trips, as well as shorten trips and encourage more transit use. Using public funds to support growth in the rural area and free standing cities encourages people to live further away from jobs (the rural jobs/population balance is seven persons for each job, indicating that these residents are far from jobs and services). Investments making that commute between rural and urban areas will spur rural population growth and thereby increase VMT, emissions and pollution. The preferred growth pattern helps correct this by adding more jobs/services to rural centers, but the job growth alone does not necessitate capacity investments.

O-104-072

O-104-072 VISION 2040 has addressed this issue, and calls for limits on infrastructure in rural areas.

Policies to state how new facilities and new capacity will be evaluated in the revised RTP need to be added, to assure that all new and improved facilities in the current RTP are reassessed in light of climate change goals and facility conservation and maintenance goals. Suggested policy: The RTP will only include plans for new or expanded road capacity when those facilities are demonstrated to reduce emissions and VMT and meet state goals for 2050.

O-104-073

O-104-073 VISION 2040 has been revised to address this issue. The Transportation section now has a subsection entitled "Sustainable Transportation" that includes policies that address transportation and the effects of emissions. Also, the Destination 2030 update will provide an additional opportunity to address this issue. In addition, see the transportation action T-Action-14 that addresses updating project criteria.

Page 68, MPP-T-14 and 15. The policies should be strengthened by including policies to reserve existing and new freight capacity for freight, through pricing or limited access, to prevent new capacity from being squandered on commute trips that should be directed to other facilities. MPP-T-16 should be expanded to more clearly encourage rail freight facilities, as rail can move substantially more tonnage/volume with less pollution than trucks. The existing policies read as ambivalent to rail freight, when they should encourage it.

O-104-074

O-104-074 VISION 2040 addresses this issue. Also, the Destination 2030 update will provide an additional opportunity to address this issue.

O-104-075

O-104-075 The Destination 2030 update will provide an additional opportunity to address this issue in greater detail.

Page 70: Choices and Mobility

This section seems to be focused on transportation choices and mobility as goals in their own right, which is highly desirable, but the overlap with the previous two sections is confusing. The section would be stronger if edited to more clearly set directions and differentiate from the sections on capacity conservation and implementing the growth strategy.

The most beneficial correction to this section would be to **eliminate the assertion, in paragraph one on page 70, that new facilities of every type will be required. That is only true if the region intends to continue the travel patterns that began in the 1960's, when we believed we had unlimited oil and federal funds. Vision 2040 is not about continuing past trends based on false expectations of the future, and must be more strategic to clearly indicate that the transportation system will not depend upon costly and inefficient new roads, car ferry capacity or airport capacity.** Vision 2040 must be clear and consistent that the region is changing its travel system to one that moves people and goods efficiently, rather than continuing the current unsustainable system.

O-104-076

O-104-076 VISION 2040 has been revised to address this issue, and include more emphasis on efficiency. The Destination 2030 update will provide an additional opportunity to address this issue in greater detail.

MPP-T-21 should be revised to clarify where the region will focus its investments; it's too vague as written. Suggested change: ".....focusing on investments that provide mobility and access that benefit all segments of the population, with the least environmental impact.

O-104-077

O-104-077 VISION 2040 now has an expanded narrative for this subsection.

MPP-T-22 should be revised to be consistent with the Vision 2040 growth strategy. Funding and investments in rural areas should be limited to safety and maintenance improvements, and to improved pedestrian, bicycle and transit circulation within free standing small cities. Any publicly funded road capacity investments in rural areas undermine the growth strategy goals of rural preservation and urban growth. The existing imbalance of jobs and population in rural areas indicates that they are bedroom communities with residents that work in urban areas. Subsidizing further population growth in rural areas with capacity improvements is inconsistent with the preferred Vision 2040 land use pattern.

O-104-078

O-104-078 VISION 2040 has been revised to address this issue. A new policy was added (MPP-T-28) to clarify limitations in the region's rural areas.

Page 71 (And Appendices): Actions and Measures

Draft Vision 2040 is to be commended for outlining actions that are needed to implement the plan, and for including monitoring programs to regularly inform policy makers and citizens about progress in completing the actions, as well as assessing the results. Futurewise is concerned, however, that the monitoring section for transportation focuses too much on investments in roads, and does not prepare sufficiently to measure the multimodal goals established in Vision 2040. The evaluation criteria in the SEIS, page II-29, give a better indication of the plan's goals, and more of these should be included in the monitoring program. **Recommended changes/additions are listed below.**

O-104-079

O-104-079 VISION 2040 has been revised to address how the initial monitoring program is expected to evolve.

Page A-2-2: Transportation investments. The measures of whether the region is funding its goals should include investments in all modes, by all agencies, including the transit agencies as well as city and county investments not funded through PSRC. As written, it's not clear that PSRC will be measuring investments unless they use state and federal funds; if only PSRC controlled funds are measured, the overall picture of whether we are jointly matching funding to state goals will be skewed since such funds have been less than 20% of regional transportation expenditures.

O-104-080

O-104-080 As the measure is developed, additional issues may be identified for monitoring.

Page A-2-5: Transportation results. The overall outcome goal is a good one, and consistent with Vision 2040 goals and policies for improved choices and mobility, but the specific measures are inconsistent with the outcome goal, as they seem to measure mainly road performance. Measures are always the clearest indicator of underlying goals; therefore, it is essential that measures of this plan get at choices, efficiency, energy conservation and emissions reductions. **Needed improvements:**

Measures of delays and travel times should be dropped, as the SEIS implies that these are only auto travel measures. If these measures are to be kept, they should be related to clearer goals that match Vision 2040 policy, e.g. travel times by transit, bike, pedestrians and auto for a specific trip type (such as a 6 to 8 mile work trip, or a specific freight trip). Averages don't really inform much and measures should be better focused for centers and corridors.

Measures of mode split and transit boardings are good, but better measures would be more clearly linked to the goals. **The measures in the SEIS that evaluate the preferred alternative compared to trends relate more specifically to Vision 2040 goals, and should be the main measures of transportation system success, with a few additions:**

O-104-081

O-104-081 VISION 2040 has been revised to clarify that the monitoring program included in the document is a starting point. An action has been added that calls for future work to refine and improve the program.

Inputs:

- **Add a multimodal connections measure, including completing missing links in the regional bike system network and completing transit links between centers, now and in the future measurement year.**

Outcomes:

- **Percent of total population/households and jobs within ¼ mile of transit service, including:**
  -near transit with 15 minute headways at peak;
  -near transit with 15 minute headways all day (5 am to midnight)
- **Percent of urban arterials having transit routes with local bus stops that have sidewalks on both sides of the street.**
- **VMT per capita, tracked against a specific reduction goal specified in Vision 2040**
- **Trip numbers and mode split measures called out separately for urban centers, cities, urban areas, and distinguishing between work trips and total trips.**
- **Percent contribution of mobile sources to greenhouse gas emissions (51% today)**

O-104-082

O-104-082 VISION 2040 has been revised to clarify that the monitoring program included in the document is a starting point. An action has been added that calls for future work to refine and improve the program.

4. *CLIMATE CHANGE ISSUES*

Futurewise commends PSRC officials for the strong new policies addressing climate change. It will take regional leadership to address this challenge, and it is appropriate for PSRC, with its forums of elected officials and local jurisdiction staff, to lead work on solutions. The text discussion is educational, and the sidebar referencing state laws provides useful context. The goal on page 34 is clear and appropriately strong. **However, the policies should be much stronger, reflecting state law requirements as well as Vision 2040 goals.** The Puget Sound region produces most of the state's emissions, since it has the most people and jobs, and thus the region can make the most significant contribution to address climate change. Since the requirements of SB6001 are known, it would be beneficial to include them as regional goals as well, specifically: to reduce greenhouse gas emissions to 1990 levels by 2020, and to reduce emissions to half of 1990 levels by 2050. Other countries have proven that this goal is achievable with through technology, transportation system changes and land use pattern changes. Studies show that technology alone, without VMT reductions, cannot achieve the needed emissions reductions, and Vision 2040 is in the lead role on transportation and land use.

O-104-083

O-104-083 VISION 2040 has been revised to address this issue. A new policy, MPP-En-20, addresses RCW 80.80.020.

Add a policy requiring local plan updates to include a carbon use evaluation of the land use pattern, and to include policies/regulations to prevent growth of the jurisdiction's carbon footprint, through adoption of site plan and street design codes, investment in facilities and street design promoting non-motorized travel or improved transit access, review of the carbon impact of major land use decisions.

O-104-084

O-104-084 VISION 2040 includes an action that calls for a regional climate change action plan. An inventory of greenhouse gas emissions will be considered as part of that work.

Measures of goal achievement in this section are good, but **two should be added: a measure of total carbon based fuel consumption, as well as per capita consumption; and a measure of total VMT, as well as per capita VMT. These measures are needed to follow compliance with state climate change law, and to encourage re-evaluation of policies if goals are not being met.**

O-104-085

O-104-085 PSRC will evaluate these suggestions and identify opportunities where it can be incorporated as appropriate. VISION 2040 has been revised to clarify that the monitoring program included in the document is a starting point. An action has been added that calls for future work to refine and improve the program.

5. ***ENVIRONMENTAL ISSUES***

The environmental section includes clear goals and strong actions, and recognizes that the approach to environmental protection and restoration must be regional to be effective. In the past, regional efforts at basin planning, habitat restoration and water resource planning have been far more effective than what any one jurisdiction could accomplish on its own. The PSRC is the appropriate forum for forging agreement on what needs to be done, and encouraging compliance with environmental protection and enhancement goals. A few suggested changes follow:

O-104-086

Strengthen MPP-En-5: Require and add incentives to restore riparian habitat and shorelines, and provide public access points, in conjunction with redevelopment of brownfields, surface parking lots, and other previously developed urban areas. Some jurisdictions already require restoration as part of redevelopment, but all jurisdictions should take advantage of redevelopment opportunities, to prevent the redevelopment from foreclosing restoration opportunities.

O-104-087

Page A-1-2, Environmental Planning. One of the near term actions listed is for PSRC to determine how it can be most effective in furthering environmental planning and climate change: Futurewise recommends that the actions to be considered include establishing and monitoring a region-wide benchmark program for environmental and climate change issues. Some of the jurisdictions already have benchmark programs in place, but including data and progress for the 4-county region would more effectively track progress and identify troubling trends that the region as a whole needs to address. Some of the most important benchmarks are already in the monitoring section, but the region should consider adding some of the measures that the environmental non-profits and the King County Benchmarks program are using.

O-104-088

Page A-2-2, Inputs/Actions. The environmental 'input' measure (existence of an environmental strategy) is a good one, but the strategy should also include a tracking list of which jurisdictions have addressed each of the environmental and climate change policies in the regional plan, and how they are doing it. The certification questionnaire is one way to collect the data, and enables PSRC to share progress with regional decision makers and citizens.

O-104-089

Page A-2-3, Measures. The measures for environmental quality are good, except that the air quality measure (unhealthy days) doesn't tell us enough, since it only measures total failure, rather than incremental trends. The SEIS includes air quality measures (page II.32) with more specificity, which enable citizens to determine numeric progress in reducing a number of pollutants. These measures should be added under the air quality section, instead of the 'unhealthy days' measure.

O-104-090

O-104-086 VISION 2040 has been revised to address this issue with revisions to actions relating to identifying the Regional Council's role in environmental planning.

O-104-087 VISION 2040 has been revised to include a new action related to estuary restoration. Some of the specific standards that you suggest can be best addressed at the local level.

O-104-088 VISION 2040 includes an action that calls for a regional climate change action plan. An inventory of greenhouse gas emissions will be considered as part of that work

O-104-089 VISION 2040 has addressed this issue, with both implementation monitoring (which tracks governmental actions in relationship to areas of regional agreement) and performance monitoring (which already tracks climate change).

O-104-090 VISION 2040 has been revised to clarify that the monitoring program is a starting point. The progress will be refined over time.

O-154

Robin McClelland

From: FormProcessing@psrc.org
Posted At: Friday, September 07, 2007 6:43 PM
Conversation: Draft VISION 2040 Comment
Posted To: Vision 2040

Subject: Draft VISION 2040 Comment

Hello!
This is results of submitted form by 67.182.134.239.

Submitter Email : FormProcessing@psrc.org

Fields:
01.name = Kirsten Ridgway Hytopoulos/ Green Voices Bainbridge Island 02.address = 4630 Blakely Ct East NE 03.city = Bainbridge Island 04.state = WA 05.zip/postalcode = 98110 06.email = kirstenhytopoulos@yahoo.com 07.comments = Mr. Abbott:

In reviewing the draft Vision 2040 plan for the Puget Sound Region, we were alarmed to read that the PSRC has designated Bainbridge Island as a "Larger City" and that the PSRC "envisions an expanding role for these cities ("Larger Cities") in accommodating growth."

Looking only to a map of the Puget Sound area, and in consideration of our proximity to Seattle and our function as a conduit to and from mainland Kitsap County, one can appreciate the "logic" behind this assignation. However, as an Island in the Puget Sound, we have a uniquely limited carrying capacity. As a community we have expressed our concern about this limited capacity in our comprehensive plan, stating that as we recognize "that the carrying capacity of the Island is not known, the citizens of Bainbridge Island should strive to conserve and protect its natural systems, within the parameters of existing data."

It is under this mandate, to protect our natural resources, and due to current data, and lack thereof, that we write to you to request that the PSRC reconsider its forecast for Bainbridge Island's role in regional growth patterns.

Our Island relies entirely on rainwater recharged aquifers for potable water. At present, we do not have reliable data regarding the status of those aquifers nor can we determine the population that can be supported by those limited water resources. We do have anecdotal data that suggests declining levels and salt water intrusion in some areas of the Island.

Of concern also is our uniquely profound per capita impact on the Puget Sound, a valuable regional and national resource, from all of our activities. For these reasons and more, as an island city, we must be evaluated under very different standards than our mainland counterparts. We ask that the PRSC re-evaluate our role in the accommodation of future Puget Sound population allocation in light of those standards.

Respectfully submitted by the undersigned members of Green Voices for Bainbridge Island.

Kirsten Hytopoulos
Beth Rahe Balas
Joyce Rudolph
Alan Rudolph
Selena Mordue
Sally Adams
Kate Smith
Lew Andrus
Rebecca Rockefeller
Andrea Steurer
Elizabeth Cromwell
Elise Wright
James Poss
Daniel Stratton

1

O-154-001 The use of regional geographies helps identify types of places in the region based on ability to absorb population and employment growth. The narrative in the Regional Growth Strategy has been expanded to clarify the purpose of regional geographies and to provide detail concerning the distribution of growth. Bainbridge Island's classification was based on applying a regional methodology to all jurisdictions. Specific decisions will be made through the countywide targeting processes.

O-154-002 Comment noted.

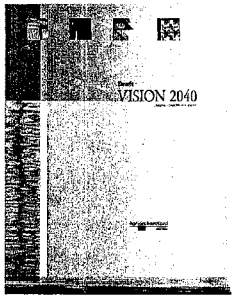
O-154-003 Comment noted. The regional geography unit of analysis leaves city level growth target decisions to the countywide planning policies that are required under state law.

Moira McDonough
Carol Appenzeller
Bonnie Albin Fraik
Candace Gudmundson
Robert Gudmundson
Elizabeth Gudmundson
Stephanie Ross
Sarah Lane
Julie Hall
Iver Macdougall
Diane Landry
Shannon Gentry
Connie J. Bickerton
Elizabeth Sewell

08.mailing list = yes
09.mailtype = email
mailto = vision2040@psrc.org,dmclaughlin@psrc.org
subject = Draft VISION 2040 Comment

Note: This page of comments does not require a response.

O-092



Draft VISION 2040

And Supplemental Draft Environmental Impact Statement

Comment Form

What do you think about the draft regional growth strategy and multicounty policies in VISION 2040?

We want your input and need to hear from you!

The public comment period lasts from Monday, July 16 through Friday, September 7, 2007.

The public is encouraged to provide thoughts, ideas, and concerns on the Draft VISION 2040. Comments can be made in one of the following ways:

- By writing to Norman Abbott, State Environmental Policy Act (SEPA) Responsible Official, at the Puget Sound Regional Council, 1011 Western Ave, Suite 500, Seattle WA 98104-1035
- By visiting the Regional Council's Web site www.psrc.org. To submit a comment, go to the Comment section of the VISION update Web page and follow the instructions.
- By sending an email to vision2040@psrc.org.
- By attending any of the Regional Council's board, committee, or other meetings and submitting a comment. A public comment period is offered at the beginning of each meeting.
- By returning this comment form.

The comments that you make will become part of the public record for this project. Your thoughts will help decision makers as they finalize VISION 2040 in fall 2007. Responses to your comments will be provided in the Final Environmental Impact Statement.

Regional VIEW, the Regional Council's monthly newsletter, is one good way to stay informed and involved. To receive a print copy of *Regional VIEW*, visit http://www.psrc.org/publications/pubs/view/viewform.htm, or call 206-464-7090.

CONTACT INFORMATION:

At a minimum, please provide your name, the county in which you live, and ZIP Code. If you would like to be added to the project mailing list, please fill out the rest of the contact information and check the box below.

NAME KARL DUFF, PRESIDENT

ORGANIZATION KITSAP ALLIANCE OF PROPERTY OWNERS

ADDRESS 6112 WYNN JONES DR E

CITY PORT ORCHARD STATE WA ZIP 98367

E-MAIL KDUFF@IX.NETCOM.COM ☑ CHECK HERE IF YOU WOULD LIKE TO BE ADDED TO THE PROJECT MAILING LIST.

Note: This page of comments does not require a response.

COMMENTS:

SEE ATTACHED

PLEASE ADDRESS COMMENTS TO:

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

Note: This page of comments does not require a response.

KITSAP ALLIANCE OF PROPERTY OWNERS

Draft Review Comments (Partial) (SECTION 2)
Section 1 submitted to PSRC August 1, 2007
Puget Sound Regional Council (PSRC) Draft VISION 2040 and Draft Supplemental Environmental Impact Statement (DEIS)

September 4, 2007

This is the second section of a two part submission of comments on the subject document. The first section is dated August 1, 2007 and includes review comments through Development Patterns, Part II: Housing (Page 51 of the printed Vision Document). This section of the review commences with Development Practices, Part III: Elements of Orderly Development and continues through the end of the Vision document.

The following comments are the result of a detailed review of the subject document. Comments are provided, first as general comments concerning the draft in total and then as specific paragraphs or items in the draft. These comments are repeated from section 1, for purposes of continuity of thought and process.

Executive Summary

Having completed the review of Vision 2040 and having compared the contents of the document to RCW 36.70A (GMA) and RCW 70.94 (Clean Air Act), it becomes apparent that little or no attempt was made to actually be in compliance with the spirit, intent, or requirements of those laws. Further, not only did the drafters of Vision 2040 take great latitude in the interpretation and application of the underlying laws, they also appear to have sought out the most stringent or extreme manner in which to apply their "understanding" of the laws. Citizens deserve better for their tax dollars. Governments were not created to exercise control over the citizens they serve but were created to defend and protect the individual rights of all citizens. The drafters of this document and those who voted to approve it do not appear to comprehend their basic responsibility to the citizens of their jurisdictions. If it were one or two policies that exceeded the scope of common sense and appropriateness, perhaps some appreciation for "misunderstanding" could be invoked. However, that virtually all goals and policies and all of the supporting strategy statements make such wide departure from underlying law cannot be written off to misunderstanding.

O-092-001

If the Vision 2040 document were not enough to cause concern, the DEIS further extends that concern. The DEIS makes the basic assumption that the policies and strategies of Vision 2020 were effective and serve as the building blocks for Vision 2040. There is no factual data provided to support that claim. In that 2020 had no specific performance metrics, no formal data collection and analysis

O-092-002

(Comment continues on following page)

O-092-001 Do not concur.

O-092-002 Comment noted. The initial Public Scoping period determined that VISION 2040 should build upon the existing VISION 2020, think long range, be bold — and provide leadership, broaden the vision to cover other important regional issues, and to be specific when possible — for example, by adding measurable objectives to policies.

process, no formal high level review and assessment process, and no outside review of results to determine success, there is no viable manner to actually determine success. Similar to many other "policy" documents, Vision 2020 assumes success simply because the document was adopted by some authority and time has passed. That is not acceptable as a methodology for establishing a baseline for any policy development and certainly will not stand as a basis for the development of Vision 2040.

Continuation of O-092-002

Aside from the assurances that this Vision 2040 has had "public input" and reflects the desires of the people. That is not the case. No individual residing in a rural area would willingly accept any of the policies directed toward rural areas. Knowledgeable people of Kitsap County would reject nearly every policy dealing with growth directed toward centers, transportation targeting SOV/POV, water issues, and the economic development policies of the vision. They just don't fit. Why any knowledgeable person would accept policies that while portending to "preserve" the character of their communities would actually destroy that character and the community itself is not understood. This document does not reflect the needs and desires of the majority of the individuals living in the respective counties and cities.

O-092-003

O-092-003 Do not concur. The VISION process included an extensive public outreach and participation effort.

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General Comments

1. The draft is uncommon for most documents of its nature in that it is well composed. In general, the language is simple and the thoughts offered are clear. While it is lengthy and redundant in some cases, that is understood as many individuals will not take time to read the entire document but will concentrate on only those areas of particular interest to them.

O-092-004

O-092-004 Thank you.

2. The draft portends to be a product of significant public input but the nature of that input and the most likely results of that input are not evident. Noting a sample of perhaps 4500 individual inputs is not significant in a metropolitan area that covers four of the most populous counties of the state, and which includes legislative, regulatory, and taxing jurisdictions numbering in the hundreds and a wide diversity of cities and population centers. While it is clear that those citizens and groups concerned with environmental issues have played a major role in preparation of the draft, there is no indication that those who actually own the property being regulated have had any involvement. In view of the ongoing litigation against King and Kitsap County concerning land use regulatory issues, providing a greater role for representatives of those interests would seem appropriate.

O-092-005

O-092-005 VISION 2040 is based on direct participation of elected officials from counties and cities in the region.

3. If memory and the public record serve correctly, PSRC has limited authority associated with determination of assignment of federal and perhaps state transportation grant funds. Even that authority is supposed to be one of collaborative effort of the federal transportation district members. To expand that role and to assume authority over land use regulation, in general, is a stretch not supported by the State Constitution or Growth Management Act (GMA). The creation of a "regional" legislative body is not addressed in our constitution

O-092-006

O-092-006 VISION 2040 does not expand the authority of PSRC.

(Comment continues on following page)
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except in the most liberal interpretation of the provisions for "city/county" government and that action would require a ballot approval by the citizens involved. The GMA, while noting a need for cooperation between adjacent jurisdictions, makes no mention of creation of a "super council" to guide the actions of member jurisdictions. RCW 36.70A.210 (7) does provide for multi-county planning but establishes specific guidelines. Kitsap County does not have a population of 450,000 or more and does not share "contiguous urban areas" with any of the other three participating Counties. The inclusion of Kitsap County in the "regional" planning policies is not supported by law and therefore cannot be legally binding on the citizens of Kitsap County. Nothing in the Constitution, regarding the functioning of county governments, authorizes the delegation of legislative authority from the county to a non-elected body. Kitsap as a non-charter county is constrained by the specific provisions of the Constitution. Further, the PSRC Board is not comprised of only legislative members of the participating jurisdictions and cannot exercise legislative jurisdiction for them. The extreme interpretation of the GMA that would permit the creation of the PSRC as a legislative body or a body exercising authority over any duly elected jurisdictional body is simply not acceptable.

4. It is clear by reading the various sections and paragraph of the draft that all 13 GMA goals (14 when shorelines are included) have not been equally considered without priority. That is a specific requirement of GMA. There is no analysis of fiscal impact included. There is no indication that property rights have been considered or provided for even though many of the policies would impose significant restrictions on the enjoyable use or control of private property. On that basis alone, the draft fails the test of compliance with GMA.

5. It is clear that the authors of the draft MPP consider environmental issues the over arching and controlling concerns of the strategy and the policies. However, there is no statement of rationale as required by GMA. Further, close reading of individual paragraphs and policies make it clear that there is no definition of any specific problem to be resolved or reason to impose restrictive policies. The sections dealing with environmental protection are rife with generalities concerning why protections may be required and even greater generalities about what the objectives of the policies are. It is clear that inclusion of the environmental policies, as primary concerns, is political in nature and has no real basis in correcting existing problems or preventing any potential, quantifiable problem.

6. Throughout the draft the issue of climate change is raised without any attempt to either define or quantify the nature of the problem. The term "climate change" is being used as the fear multiplier of the day to force the uninformed to actions that have no basis or no foreseeable results. Let's all agree that climate changes. Let's further agree that climate is global in nature with local impacts. Perhaps we can also agree that the science (not the number of "scientists") on the reasons for "global warming", a normal evolutionary function, is not complete and not agreed upon universally. Perhaps we might accept that science has made more positive direct links between the activities of our sun on climate change than has been made for any natural occurrence on earth. Perhaps we can agree that the most significant contributor to "greenhouse" gases is water vapor which is conveniently overlooked in all discussions and calculations concerning the effect

(Comment continues on following page)

Continuation of O-092-006

O-092-007

O-092-008

O-092-009

O-092-010

O-092-007 Comment noted. Note that Kitsap County has been a member of PSRC, and its predecessor agencies, since the 1950s.

O-092-008 This provision is within the authority of the Regional Council's mandates under state law (such as the Growth Management Act {see "The State of Washington's Growth Management Act and Related Laws - 2007 RCW Update"}, the Clean Air Washington Act, the Interlocal Cooperation Act), federal law (such as the Safe, Accountable, Flexible, Efficient, Transportation Equity Act -- a Legacy for Users, the Presidential Executive Order 12898 on Environmental Justice, the Clean Air Act), its Interlocal Agreement with its members, as well as the requirements related to the designations as the Regional Transportation Planning Organization, Metropolitan Planning Organization, and Economic Development District for the central Puget Sound region.

O-092-009 Comment noted.

O-092-010 Comment noted. VISION 2040 was revised to more fully address climate change issues.

of those gases. Perhaps we can agree that a primary contributor of Carbon Dioxide into the atmosphere is breathing humans and mammals. Perhaps we can agree that using fear and diverting our attention and energies from real research and development is not in our best interest but is little more than an attempt to gain or consolidate political power.

Continuation of O-092-010

7. Throughout the draft, issue is taken with the activities of prior generations of humans and the unnecessary impact on the "environment". Unfortunately, little credit or understanding is given to those generations for enabling us to be here today to be debating or discussing the issues before us. Two hundred years ago the region was sparsely inhabited by small bands of nomadic tribes who used the local environment for their purposes. These were basic survival uses by tribes who had no written language, offered no inventive skills, and who survived by acting as inefficient hunter gathers. They comprised no "great civilization" as might be envisioned by the Maya or Inca. When the first western culture settlers arrived they came to exploit the natural riches of the area. Without them, the settlements they established and the economies they developed, would not be here today. Yes, their communities were compact and "pedestrian friendly"; that was the only available mode of transportation. Remember that Lewis and Clark traveled from St. Louis to the Pacific Coast by canoe and by foot, not because they wanted to but because there was no other way. To equate or cite "pedestrian friendly" communities as a historically desirable condition is inappropriate. Our region grew because the natural resources of the area supported that growth. To now find fault with that growth as irresponsible exploitation is to indicate that we should not be here. The most important economic factors of our region today are built on the use of resources over the past 150 years. The economic engines of the ports of Seattle, Tacoma, Everett, and Bremerton exist because prior generations reconfigured the shore line to take advantage of the opportunities. Vast land areas have been transformed from woodland to industrial and commercial uses or to housing. Those uses give us the opportunity to raise above basic survival levels and to engage in these esoteric discussions about how to save our world. We wonder if our predecessor generations, or those trying to eek out basic survival existence in third world nations, realize the low esteem in which PSRC holds them for efforts, successes, and dreams.

O-092-011

O-092-011 Comment noted.

8. Throughout the draft are numerous policies that would restrict the use of rural lands or dictate certain uses of land in other categories. Not mentioned in those discussions or policy statements is that the land in question is private property and the impact of the actions has direct effect on individual citizens and not some amorphous group identified as "public good". Private property is the basis for all wealth generated in our open market economic system. Private property represents the labor and investment of private citizens and, in most cases, is the central wealth of any private estate. The continued existence and protection of private property is the keystone of the continued political and economic health of our country. Our state Constitution and the GMA both stress the necessity of protecting the rights of ownership of private property. Vision 2040 and the DEIS openly attacks the protected rights of "enjoyable use", "control of access" and "disposition". The policies in the draft tend to treat private property ownership as

O-092-012

O-092-012 Comment noted.

(Comment continues on following page)

a privilege rather than a protected right. The policies take action in the name of "community good" when no such entity exists. If the policy drafters need an understanding of the concept of "group rights" they need look no further than the Constitution. The opening words "We the people of the State of Washington, grateful to the Supreme Ruler of the Universe for all our liberties, do ordain this constitution" make it clear that the constitution should be the document to define group rights. "Group" rights do not exist. Please note that the preamble also identifies the Supreme Ruler as the source of our individual rights, not the state or PSRC.

Continuation of O-092-012

9. Throughout the draft various policies direct jurisdictions to "restore" environments. First and foremost, GMA does not mention or require restoration of environment or habitat. GMA requires protection of those critical areas so designated. If the intent is to expand the guidance for restoration of watersheds, that guidance would then apply to the entire land mass of the area and all actions to "restore" would apply equally. In order to "restore" anything, there must be a baseline for that restoration. Such a baseline has not been established. If the baseline is to be a point in time, appropriate documented scientific evidence as to conditions at that time would be required. To date no such evidence has been brought forward. In this regard, it is best to be careful what we wish for. We already have the tribes insisting on conditions that most probably never existed and which are not documented.

O-092-013

O-092-013 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (see response to comment O-092-008). Also, VISION 2040 was revised to define what is meant by "restore."

Part III

Page 52 paragraph 1

"The GMA advances orderly development...: This is not included in any GMA Planning Goal (RCW 36.07a.020) nor is it mentioned in the overarching legislative finding for GMA (RCW 37.07a.010). What is the specific reference in context for this statement?

O-092-014

O-092-014 See RCW 36.70A.210.

Page 52 The Built Environment....

Page 52, Paragraph 1

"Health and well being are directly linked with how we live and how we get around". This sentence is self serving and totally out of place in this document. If it is the intent of Vision 2040 to expand the role of Public Health to be concerned with every element of our lives, the policy reaches far beyond the provisions of law and the authority granted to government. How we live and how we get around is a matter of choice, a freedom still available to Americans. Pull this statement and any and all policies that would implement government controls over "How we Live" and How we get around," as a matter of choice.

O-092-015

O-092-015 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008).

Page 52, Paragraph 1

"Public Health agencies.... keeping entire communities healthy, safe, and livable." Please provide the specific legal reference for this level of involvement and authority. It appears that PSRC has over extended the authority and the capabilities of Public Health. Either prove this or pull it.
Paragraph 1

O-092-016

O-092-016 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008).

"These agencies work to prevent the spread of disease, to [protect people from unsafe water, polluted air, and hazardous waste, and to help people live healthy lives". See the comment above. Either rewrite this to be consistent with the actual legal function of Public Health (not an interpreted view) or pull it from the document. Once revised or pulled revise the remainder of the document to reflect the accurate role of Public Health.

O-092-017

O-092-017 Comment noted. This broad view of the role of public health is appropriate in this context.

Page 52 Paragraph 2

"Physical inactivity is a growing health problem in the United States..." Please cite the GMA reference for your concern about a citizen's level of physical activity. GMA is not provided as an open ended guide for social engineering and the advancement of political agendas.

O-092-018

O-092-018 See VISION 2040 Issue Paper on Health for a more detailed explanation of the importance of this issue.

Page 52, paragraph 2

"....communities that are more compact and feature a mix of land uses, are connected by pedestrian and bicycle facilities and transit and rely less on driving, are those conducive to physical activity" Please identify not fewer than 10 such communities in the region each having a population of not fewer than 15, 000. Include the work locations for the residents of these "communities" and the percentage of "residents" who commute by walking or by bicycle. Also identify the location of significant services such as grocery stores and other common retail locations and how those locations are accessed by "residents". It is most probable that the communities that PSRC describes are really the objective of the vision and do not currently exist.

O-092-019

O-092-019 See VISION 2040 issue papers and other PSRC publications. Nearly all of the cities in the central Puget Sound include some of these features. For example, see Bremerton, Renton, Everett, and Tacoma.

Page 52, paragraph 3

"Uncontrolled and expansive development patterns contribute.... to declining water resources and quality." What is the specific quantitative and qualitative proof of this statement? What "water" is included? Based on public records it actually appears that water quality is continuing to improve rather than decline and quality standards continue to become increasingly stringent. The most significant losses of water quantity are directly linked to current government policies on waste water effluent and storm water control, both of which take ground water and discharge it away from aquifers. Further, the continued pollution of major bodies of water by releases from municipal sewage facilities far outweighs impact of septic systems. Please make sure that general statements upon which policies will be based are factual.

O-092-020

O-092-020 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008).

Page 52, paragraph 3

"More driving results in more vehicle related accidents." This is entirely self serving and has no place in this document. It is just as true that poorly designed roads and roads not maintained properly to handle traffic loads are a prime cause of vehicle accidents. This entire approach is well outside the goals and objectives of GMA. Remove the sentence and any policies based on the sentence.

O-092-021

O-092-021 Comment noted. This is a general statement based on measurable data.

Page 52 BOX HealthScape

While the existence of the study is interesting it has no bearing on the matter under discussion. First King County is not the entire region and unless the study covers the entire region, it has no overall application to policy development. Second, GMA is not a

Continuation of O-092-017

O-092-017 See response to previous O-092-017. (continued)

(Comment continues on following page)

social engineering ordinance and continued efforts to implement political social agendas under the cover of GMA are fully inappropriate. What is the GMA reference for this specific concern?

Page 52 BOX Food Production

"The system for producing and delivering food is highly complex and involves processing, transportation, distribution, consumption, and disposal." Translated, the sentence says that to be effective, food supplies for the residents of the region relay on distant producers of common food stuffs, a highly developed and efficient delivery system based on rail and roads, and an efficient, cost effective distribution system. It appears that the elements of the food supply system requirements are at odds with almost every element of this vision. There is no way for the region to be self sufficient in food production and supply. What percentage of the food consumed in the region is produced in the region? Of that quantity, what percentage of the essential foods are produced in the region? If food production and supply is a major concern, why is it not addressed more thoroughly in those sections of the vision that impact the production and delivery systems?

Page 53

Goal: "promote physical, social, and mental well-being" – Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy?

MMP-DP-39

"Incorporate provisions addressing health and well being" - Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy?

MPP-DP-40

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy?

MPP-DP-41

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? How would the "design guidelines" be enforced to ensure achievement of this goal?

MPP-DP-42

Continuation of O-092-017

O-092-022

O-092-023

O-092-024

O-092-025

O-092-026

O-092-022 Comment noted.

O-092-023 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (see response to O-092-008). Also, see Issue paper on Health in the appendix of the Final EIS.

O-092-024 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008).

O-092-025 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008). See RCW 47.80.

O-092-026 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008).

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? What portion of the farmland in the region produces foodstuffs as opposed to other products? What percentage of the foodstuff actually produced in the region are consumed in the region and what percentage of the total food requirements are satisfied by region production?

O-092-027

O-092-027 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008).

Page 53 Innovative Techniques

Page 53, Paragraph 1

"GMA states that local comprehensive plans should provide for innovative land use and development techniques". RCW 36.07A.190 actually states "A comprehensive plan should provide for innovative land use and management techniques, including but not limited to density bonuses, cluster housing, planned unit developments and the transfer of development rights" Please use the correct quotation of GMA requirements so as to prevent inappropriate policy creation.

O-092-028

O-092-028 Comment noted. This idea was considered in the update process but the language was kept as written.

Page 53, paragraph 2

"Reducing storm water drainage infrastructure - pipes, ponds, and other structures – can actually lower infrastructure costs." This is perhaps one of the more interesting conclusive statements of the document. If you are not required to build something it will cost less. Interesting that developers and homeowners have been trying to make this point for the last 15 years without success. Perhaps more important is the concept that a storm water control system that actually plans and provides for the effective use of water retained is superior to a system that simply retains water for discharge at a future date while prohibiting use. With an obvious understanding of the inappropriate cost of unnecessary storm water systems, perhaps we can get back to common sense and a more effective use of scarce public and private funds.

O-092-029

O-092-029 Comment noted.

Page 53, paragraph 3

"Environmentally friendly construction…" The opportunities to implement and effectively use technology as a tool for more efficient and less expensive housing has been available for a number of years. The single largest impediment to technology implementation has been governmental resistance to technologies that were "not invented here". Because the planning and inspection staffs at local levels failed to remain current with technological advances in their respective fields or because local building codes were too inflexible to permit new technologies, we have failed to maintain pace. Now it appears that through enlightened policy government will save the day by implementing technology as a savior. It would be much better if government just got out of the way and stopped over regulating every aspect of development and construction. If the effectiveness of government policies and their implementation can be gauged by the outcome of public facility construction and use, the case would be made against those policies.

O-092-030

O-092-030 Comment noted.

Page 53, paragraph 4

Purchase of development rights refers to programs through which local governments may purchase development rights and dedicate the land for conservation easements, protecting it as open space or agricultural areas." This appears to be consistent with

O-092-031

O-092-031 This idea was considered in the VISION process, but it was determined that a new policy was not needed.

(Comment continues on following page)

8

RCW 36.07A.160 and 165 which provide for government purchase of private land for these purposes but which also restricts use of adverse possession in some cases. The bottom line is that the statement supports the Constitutional prohibition against "taking" without just compensation and the GMA goal dealing with private property. Perhaps a specific policy statement concerning the requirement for local government to either purchase development rights or complete adverse possession for private property to be used for the public good would be in order.

Page 53, paragraph 4

"Transfer of development rights…." Continued discussion with real estate professionals result in a clear understanding that this approach is exceedingly dangerous and not appropriate for best interests of current and future property owners. The concept creates a new definition of the "right of disposition" one of the "bundle of rights" associated with property. Under disposition, the property owner has the right to sell or otherwise dispose of all or part of his property. That has historically included selling mineral rights and or leasing part or all of the property to another. The key to disposition is that it has always been restricted to the specific geographic confines of the property involved. For example, sale of mineral rights entailed providing the opportunity to extract and use the minerals contained within the property. Sale of mineral rights did not include an arrangement so that mineral rights on one property where they could be legally exercised were curtailed so that similar rights could be exercised on a property where they were restricted. While the TDR concept is intended to circumvent the normal limitations of development there are unintended consequences. If a TDR from rural to urban is permissible, would a TDR from urban to rural be allowed? If not, what would be the legal restriction for such a TDR? This is not a good policy and is not necessary to meet the growth objectives of any county or city.

Page 54 Policies

MPP-DP-43

What is the long range economic impact of TDR? What title companies and professional real estate organizations enthusiastically support the TDR concept? What is the fall back position if TDRs do not work as envisioned? What is the impact of rezoning on the value or validity of already executed TDRs? What is the legal impact of TDRs that go in one direction only? What are the unintended consequences of this policy?

MPP-DP-44

The policy applies "incentives" (read tax revenues) to products that are already in the market place or being market driven. The major restraint on "innovative techniques" is government regulation. Delete this policy and replace it with one that eliminates government roadblocks to innovation by builders and developers.

Page 54 Incompatible Land Uses

Continuation of O-092-031

O-092-032

O-092-033

O-092-034

O-092-032 Comment noted. The policy was revised to address 2007 state legislation.

O-092-033 By definition, "unintended consequences" are unknown. VISION 2040 was revised to address RCW 43.362 on TDR.

O-092-034 This idea was considered in the VISION 2040 process and the language was kept as written.

"….may result in negative impacts on one property or another such as noise, glare, increased traffic, or potential safety or health hazards." What is the specific GMA reference for this matter? It is almost inconceivable that adjacent development would not involve any or all of the elements cited. The purpose of the statement and the paragraph is not clear based on the examples given and the "principle" cited. If the intent is to address separation of residential areas and airports or port facilities, make that clear and preclude misinterpretation. Of course, it is a little late to be worried about "incompatible uses" for most area air facilities and port facilities.

O-092-035

Page 54 Policies

MPP-DP-46

Exactly how this policy is to be implemented is not clear. The examples of SEATAC, Boeing Field, McCord, and fields in Everett and Renton, most certainly would be contrary to this policy short of major public buyout of private lands. This policy needs a more realistic approach.

O-092-036

MPP-DP-47

The individuals who have owned property adjacent to military facilities which predate those facilities have every right to expect to gain useful enjoyment of that property. When conflict exists, eminent domain, as used to create the PSNS security buffer in Bremerton, is the appropriate government action. This policy should be revised to reflect the use of eminent domain or should be deleted.

O-092-037

Page 54 Concurrency

Page 54, Paragraph 1

The GMA intent of concurrency is that government will keep pace with development or it will curtail development. The emphasis is on keeping pace and not using concurrency as a control device. Unfortunately, local governments have opted to use concurrency as a control device to limit development except in areas and at densities acceptable to those governments. A clear statement of what concurrency means and how it is to be implemented would be more appropriate than the lengthy prose presented.

O-092-038

Page 54, Paragraph 1

"Cities, especially those with designated centers, would benefit from tailoring their concurrency programs to set different levels-of-service and impact assessment expectations in the centers or downtown districts than elsewhere in their jurisdictions." Please see the comment above as this statement is a clear example of such misuse of the concurrency concept. "Centers" are not recognized in GMA and are a transportation funding creation. To give priority to centers would deny equitable consideration to all other areas and result in constrained development in those areas. The taxes that pay for the infrastructure supporting concurrency are extracted from all areas and should not be used to force implementation of a specific political agenda, to the detriment of the taxpayers.
Page 54, paragraph 2

O-092-039

O-092-035 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008).

O-092-036 Comment noted. See RCW 36.70.547.

O-092-037 Issue best addressed at the local jurisdiction level.

O-092-038 VISION 2040 has been revised to provide additional information on concurrency.

O-092-039 VISION 2040 promotes growth in centers as a way of accommodating local growth targets. VISION 2040 promotes the use of concurrency to help implement local plans.

"Recent amendments to state law encourage..." Please provide the specific reference so that context may be clarified. Please also review the meaning of the term "encourage". The words mandate and force are not part of that meaning. "Encourage" does not mean "mandate" and "where appropriate" does not mean in every instance.

O-092-040

O-092-040 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008). See RCW 36.70A.108.

Page 54, Paragraph 2

"Improved coordination ....." There is no apparent basis for this statement. City and county planning is already subject to "consistency" under GMA. Planning for state and federally funded infrastructure is already conducted at a higher level. Why would there be any specific benefit for coordinated concurrency planning? How exactly does Kitsap County benefit from coordinating concurrency with King, Pierce, or Snohomish counties?

O-092-041

O-092-041 Given that Kitsap County participates in regional planning, coordination with Kitsap is important.

Page 55 Policies

MPP-DP-48

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? This policy is a transportation policy and not appropriate for this section. Since there is no policy addressing roads and highways with respect to concurrency, are we to assume that those facilities will not have top priority?

O-092-042

O-092-042 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008).

MPP-DP-49

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? Since "centers" are not covered by GMA, why should "centers" have priority over all other land use considerations with respect to concurrency? What is the specific rationale for this policy?

O-092-043

O-092-043 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008).

Page 55 Urban Design

Page 55, Paragraph 1

The purpose and meaning of this entire paragraph defies comprehension. There is not a substantive element of fact that would serve as the basis for policy development. The paragraph is little more than an emotion based perception of the area. Please provide the hard evidence that supports any or all of the statements in the paragraph. The facts need to support the actual statements made and not some associated or derivative meaning.

O-092-044

O-092-044 Comment noted.

Page 55, paragraph 2

Functional, ecological, economic, and social objectives ...." Please provide the specific GMA goal for this statement and the GMA reference that supports it and the statements that are derived from it and that follow in the paragraph. The establishment of priorities in the statement also is contrary to the provisions of RCW 36.07A.020 and must be explained and justified.

O-092-045

O-092-045 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008).

Page 55, paragraph 3

"A strong identity or connection with place....." This is a recurring theme throughout the Vision document. Unfortunately, for the policy makers, this "sense of place" already exists in most areas and is easily understood as the concepts of "home" and neighborhood". Virtually all policies in this document would supplant that current identity and connection with another that is conceived to be better by the planners. Redevelopment, infill, increased densities, introduction of mixed use into existing residential areas, and similar policies create new "communities" at the expense of existing communities. If the existing conditions permit easy assimilation of "new" design standards and uses, all will go well. However, when the standards force the elimination of existing communities in favor of a preferred model, community is lost. Further, the ability to achieve the infill and redevelopment goals in the time horizon of the Vision presumes that areas are prepared for such action. In fact, most areas are less than 30 to 40 years old and short of a major market demand, will not be ready for redevelopment to new design standards.

O-092-046

Page 55, paragraph 3

"Because ecological systems are regional in scale, design efforts must be applied at the regional as well as local level." What is the GMA requirement for this concept? In fact, ecological systems are more properly considered on the geographic area or continental scale so perhaps design efforts should also be considered on that scale. Would PSRC consider expanding its horizons to include British Columbia?

O-092-047

Page 55, paragraph 4

"Design advances a systems approach to address land use, transportation, environmental, urban form, and social concerns holistically." Please provide the specific GMA goal and implementation references for this statement. A holistic approach to planning would, by definition ignore the study and analysis of the individual parts of the system. Such an approach would do little more that be responsive to symptoms and not address core issues. This is not a fact based approach to planning. This approach will result in highly detrimental unintended consequences and will provide no reasonable means for determining success. This approach only paves the path for additional government intervention and control downstream.

O-092-048

Page 55 Policies

Goal: "The region will use design to.... restore the environment." - Please provide the specific GMA reference for these requirements. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? Exactly how will "design" be used to shape the physical environment when a previously stated objective of the Vision was to develop with minimum impact on the physical environment? Have the goals and policies of this "Vision" been reviewed to assure consistency or are they so poorly written that such a review would be meaningless?

O-092-049

MPP-DP-50

This policy is totally subjective and there is no practical way to assess achievement. Exactly what are "those elements and characteristics"? What are "natural visual

O-092-050

(Comment continues on following page)

O-092-046 Comment noted.

O-092-047 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008).

O-092-048 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008).

O-092-049 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008). VISION 2040 addresses a wide variety of competing and complementary issues, and seeks to find a balance among the issues.

O-092-050 The issue was considered in the VISION 2040 update process but no change was made to this policy.

resources" and "positive urban form elements"? How would these elements be "protected"? What if they are outside the region, for example, the Olympic Mountains? Delete this policy or rewrite it in objective, measurable terms. What is the cost impact of this policy?

Continuation of O-092-050

MPP-DP-51

This policy, as stated, could be implemented to eliminate all further development in the region and force the permanent preservation of major portions of the area. What is the specific GMA goal and implementing guidance for this policy? What are the definitions of each of the elements to be "preserved"? How are the elements to be preserved identified and delineated and who has the authority to make such decisions? What is the methodology for purchase or possession of the elements, consistent with RCW 36.70A.160 and 165? What is the fiscal impact of this policy?

O-092-051

O-092-051 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008).

MPP-DP-52

This "collective" policy is subjective in nature and duplicates a number of previous more specific policies. In addition, implementation of the various elements of the policy would be in direct conflict with each other. For example, the policy appears to consider that no communities that meet the criteria already exist (while I tend to agree, it is not good policy). The concept of "compact urban communities" and "preserve local character" will most likely be in direct conflict in many cases. The requirement for "compact communities" with "mixed use" while providing "housing choice" may not be practical unless very limited housing choice is still considered choice. Please provide the specific GMA reference for each of the elements in this requirement. Please cite the specific GMA goal that covers each element. What is the fiscal impact of this policy?

O-092-052

O-092-052 Do not concur that these provisions are in "direct conflict." This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008).

MPP-DP-53

Will not the market place determine the type and size of buildings that are required? Is the intent of this policy to predetermine what buildings should be constructed and then force business and residents into those buildings? What is the specific GMA goal that is implemented by this policy? What specific GMA provisions cover implementation of this policy? How will success of this policy be measured? What is the fiscal impact of this policy?

O-092-053

O-092-053 This idea was considered in the VISION 2040 update process but the language was kept as written.

Page 56 Policies (Continued)

MPP-DP-54

Please provide the specific GMA reference for each element of this policy? Please cite the specific GMA goal that covers each element. What is the fiscal impact of this policy? Exactly what does "increase the region's resiliency in adapting to changes or adverse events" mean? Of note, you forgot to include saving the starving around the world and world peace.

O-092-054

O-092-054 Resiliency means planning in a manner that strengthens our ability to deal with potential crises – both human and natural. This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008).

MPP-DP-55

It is significantly more cost effective to properly design a basic building that can be replicated at reduced cost than to seek to achieve recognition as design award winners. Form, fit, function and life cycle cost take priority over sense of community and sense of place. What is the GMA requirement for this policy? What is the cost impact of this policy?

MPP-DR-56

Once again the concept of centers overrules the basic needs of our communities in general. What is the specific GMA requirement for this policy? What is the cost impact of this policy? What are the unintended consequences of this policy, if creation of a park requires increased population density elsewhere?

MPP-DP-57

This is the first policy that addresses potential impact on existing communities by the policies elsewhere in this document. Of note, the policy does not require action to preserve the existing communities. What GMA goal or requirement supports the destruction of existing communities for the sake of political transportation agendas or other political land use agendas?

MPP-DP-58

This policy appears to contradict a number of other policies related to straight line streets, grid systems and clustering about transportation nodes. What efficiency element is involved with implementation of this policy and how does this policy serve effective and efficient transit between centers? What is the GMA goal that requires or supports this policy? What is the cost impact of this policy?

MPP-DP-59

The Policy as written would be virtually impossible to implement in any meaningful manner and has no reasonable means to determine success. The actual meaning of the policy is not clear and introduces concepts not previously discussed in the supporting materials. In fact, the remainder of the document has made concentrated effort to speak of all elements of the planning process as parallel and associated systems and not linear systems. What is the GMA goal that supports or requires this policy? What is the fiscal impact of this policy? How does this policy related to other ""system" level policies?

Page 56 Overview

Almost all of the implementing actions are not associated with the policies. How the implementing actions will actually implement policies is not clear. In addition most of the implementing actions are, in reality, separate actions that do little more than provide continued work for PSRC or further confuse the planning effort. For example:

"Developing best practices for sustainable regional design" presumes that there is a need for such "practices" and that sustainable regional design is a desired and appropriate policy.

(Comment continues on following page)

O-092-055

O-092-056

O-092-057

O-092-058

O-092-059

O-092-060

O-092-055 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008).

O-092-056 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008).

O-092-057 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008).

O-092-058 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008).

O-092-059 This policy has been rewritten. This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008). The policy is meant to be consistent with other provisions that address systems in VISION 2040.

O-092-060 Policy references are provided for each of the actions. VISION 2040 was revised to bring the actions from an appendix into each of the respective policy sections.

Providing guidance for using multimodal approaches to concurrency presumes that such guidance is necessary and that the guidance will be followed. If the process is so common or so widely accepted, why is it necessary to "provide guidance"? Is "provide guidance" a code phrase for "verify compliance"?

"....practices that contribute to physical, social, and mental well-being" assumes a role well beyond that addressed in GMA. In fact, this sentence alone identifies the underlying premise that it is the responsibility of government to ensure the absolute well-being of the citizen. Please identify the GMA requirement for this matter and further, please identify the legislative action that assigns this responsibility to county or city government.

"Monitoring efforts related to health" is a far stretch from land use and development issues as addressed under the **Growth Management Act.** Please identify the specific GMA provisions that address this issue and cite the authority under which counties and cities would exercise this responsibility.

"....improvements in the regions non-motorized network" This is clearly outside the requirements of GMA. The continued stress on elimination of the POV (privately owned vehicle) as an element of the overall transportation scheme is inappropriate and contrary to the expressed wishes of the people. Before we embark on a policy set that would drastically reduce use of POV (set a goal at not less than 45 percent of all travel be other than POV) we need to address exactly how the transit needs of the public will be met (both commute and general) and what the cost of that will be. Then we have to address all of the unintended consequences of such a policy once implemented and the costs of those policies.

Page 57 The Economy

Overarching Goal: The goal as written would be virtually impossible to implement in any meaningful manner and has no reasonable means to determine success.
How about reducing this subjective prose to a simple --"Provide a business friendly environment that supports the growth of existing business and the introduction of new business into the region"?

Page 57, paragraph 1

"It is also one of the most technologically advanced regions in the United States for turning cutting-edge research into products and services" This statement requires specific examples. If the statement were true, businesses would be beating down our doors to locate in the area.

Page 57, paragraph 2

"The region's outstanding natural environment is a key element for economic progress. Our abundant natural resources and spectacular setting make every industry more competitive in a global economy" These two sentences address totally separate and discrete factors. The "spectacular setting" is not an economic factor. The "outstanding natural environment" - unless reference is intended to a deep water port, availability has little to do with actual economic success. In fact, our continued emphasis on enhancing

(Comment continues on following page)

15

Continuation of O-092-060

O-092-061

O-092-062

O-092-063

O-092-061 The proposed rewrite is too narrow for the policy section's overarching goal. Do not concur.

O-092-062 VISION 2040 has addressed this issue in a subsequent paragraph on this page.

O-092-063 Comment is contrary to GMA and VISION 2040. Do not concur.

and restoring our environment has resulted in decline of some natural resource industries and the inability of others to start up. Natural resources, from an economic standpoint, have little value unless they can be efficiently and effectively exploited. An undeveloped gravel pit is just another hilly area and a non-timbered forest is nothing more than a stand of wasted trees.

Continuation of O-092-063

Page 57 paragraphs 3 and 4

Immigration only supports economic development if the immigrants are properly trained and can serve in the employment opportunities available. Additionally, the immigrants must have a means to assimilate into the general population and adopt the local culture without the need to give up their native culture. The end point of immigration should be assimilation and Americanization of the immigrant and successive generations. That is the history of our nation and the reason we are able to serve as the land of hope for the peoples of the world. The concept that our global economic viability depends on immigration denies the reality of world markets. We are successful when we provide needed quality products at lower life cycle cost to the consumer.

O-092-064

O-092-064 Comment noted.

Page 57, paragraph 5

"More than any other state in the nation, Washington's economy depends on foreign trade and the central Puget Sound region is vital to the majority of the states trade activity" This statement while impressive needs to be justified by factual data. There is no doubt that the economy of the state would be crippled if the region were to become less viable as an international transshipment point and as a supplier to international markets. However, most of the items and materials transshipped are manufactured elsewhere and could be shipped from other ports. If the statements are true, it is somewhat surprising that one of the most basic policies in this document is not to preserve the trade functions of the Puget Sound region.

O-092-065

O-092-065 VISION 2040 has addressed this issue in policies MPP-Ec-3 and MPP-Ec-4, which together recognize the importance of ports and trade.

Page 57, paragraph 5

It is of interest that "forest" products are listed as a major international export. In fact our past environmental policies have virtually eliminated our timber industry and our continuing misguided conservation activities reduce the effectiveness of this renewable resource on both public and private lands. Our exports are raw timber while train loads of finished timber products cross the border from our neighbor to the north. Not only have we eliminated a wealth generating industry but we have directly impacted the cost of every finished product that uses timber in its construction or manufacture.

O-092-066

O-092-066 VISION 2040 has been revised to remove the reference to forest products as a major export. Thank you.

Page 58, paragraph 1

"Talented people flock to the region" What is the specific factual data reference for this statement? What are the actual numbers of those arriving to those departing? What percentage of our youth departs the area after graduation from high school or college because suitable wage jobs are not available? What are the actual numbers of employment opportunities lost because of businesses that leave the area?

O-092-067

O-092-067 VISION 2040 has deleted this sentence.

Page 58, paragraph 2

"....new emerging technologies" What are they, how do they generate wealth, and what is their life span? Are they private sector or public supported? What is the employment profile that they offer?

O-092-068

O-092-068 See Prosperity Partnership's Regional Economic Strategy (prosperitypartnership.org/strategy/index.htm).

Page 58, paragraph 2

"Climate change….. " This continued emphasis on the cause of the week is not appropriate. Just in case you have not noticed, there is a rising voice being heard that questions, on a sound scientific basis, the claims of doom and gloom and the need for "immediate" action. Who has completed the fiscal impact study of implementing the policies related to "climate change"? Who has completed the scientific studies of the various policies that would be implemented to validate that they would achieve the intended results? How do we cover the "sunk cost" of responding to this non-issue when the sky stops falling?

O-092-069

O-092-069 Comment noted. See RCW 80.80.020.

Page 58 BOX Prosperity Partnership

The partnership has been in operation for over 3 years. What are the specific successes of the operation? What businesses have located in the region? What level of wealth have they generated for the region and what level of employment have they generated? What businesses have left the region in the same period? Why was the partnership unable to keep those businesses here? What is the cost to date for the effort? How is the cost being covered?

O-092-070

O-092-070 See Prosperity Partnership's Regional Economic Strategy — Regional Competitiveness Indicators Report.

Page 58, Paragraph 3

The intent of this paragraph is not clear. The paragraph starts by introducing economic concepts without explanation or example. The paragraph then continues to speak in non-economic terms regarding urban pooling and public and private talent. The entire discussion may make sense to the drafter but has little meaning to one not fully clued to the specific and very limited economic profile being discussed. There is considerable doubt that the Bellingham to Olympia corridor could be considered a single economic unit. Clearly Kitsap County does not fit in that profile. If the contents of this paragraph are critical to understanding polices in the vision, a much better job of writing is required.

O-092-071

O-092-071 See Prosperity Partnership's Regional Economic Strategy.

Page 58 BOX Regional Economic Strategy

Once again, this effort has been ongoing for over 2 years. What results have been achieved at what cost? What potential businesses were not captured and why? What has been determined to be the single most significant detractor for businesses locating in the region?

O-092-072

O-092-072 See Prosperity Partnership's Regional Economic Strategy.

Page 59 Regional Approach

Page 59, paragraph 1

"Regional Economic Strategy" What is this document? Who prepared it? What public input has been solicited and received? How is it implemented? How is it tested for accuracy and effectiveness?

O-092-073

O-092-073 See Prosperity Partnership's website for more information and detail.

Page 59, paragraph 2

"....support for business and job creation through retention, expansion, and diversification of the region's employment base..... fostering a positive business climate". This is clearly the key to economic health anywhere. Has anybody bothered to send the message to Olympia and to the county governments? When the climate is actually friendly, the trained work force is available, and business can function through time in a cost effective competitive basis, business will come. Unfortunately, those conditions do not exist throughout most of the region.

O-092-074

Page 59, Industry clusters

The concept being forwarded is not a new and exciting idea; it is simply the sound economic basis for successful business practice. A producer likes to be convenient to his market and likes to have his key suppliers convenient to him. This practice can be found in almost all existing major industries. The order of arrival may not be as important as is the climate for business. If a major supplier to several end users locates in the region and is both successful and happy, other businesses may follow the lead. Eventually, a major industry may follow to be near suppliers. Conversely, if a major industry locates in the area, it is much easier to recruit suppliers and supporters to the area. In every case, the real incentive is a friendly environment and a government willing to work with new and existing business to facilitate success.

O-092-075

Page 60 paragraph 1

A common element for leveraging a position as an international gateway is the existence of a well developed network of roads into and out of the region as well as within the region. In business, and especially with regard to logistics, time is money and "just in time" is a way of life. Rail service provides one avenue of access but roads are still the major arterials for distribution and concentration of goods. Logistic principles rely on regional roads as the primary arterials for transport. Without a good and effective road system, the effectiveness of a port system as a gateway will be lost.

O-092-076

Page 60, paragraph 2

"....high quality infrastructure" includes rail service and roads. Both have equal importance to the viability of the gateway.

O-092-077

Page 60 BOX Family Wage Jobs

The definition is just a bit too classic. The considerations for a family of four are housing, food, clothing, transportation, medical, and taxation. Please provide a definition that properly addresses the elements of supporting a family of four. This is important because in the region today, to meet the basic obligations for a family of four a family income of about $80,000 ($40 per hour) is required.

O-092-078

Page 60, paragraph 3

O-092-074 Comment noted.

O-092-075 Comment noted. The Prosperity Partnership's Regional Economic Strategy includes clusters as well as other economic issues and initiatives beyond clusters.

O-092-076 Comment noted.

O-092-077 Comment noted.

O-092-078 VISION 2040 has been revised to address this issue.

"Vision 2040 recognizes……" This statement makes no apparent sense when considered in the context of the remainder of the document. Throughout the remainder of the Vision, every effort has been made to criticize and denigrate the use of motorized vehicles for transportation. Unfortunately just the opposite is true for effective economic development and business functioning. As noted above, business needs roads. So do average citizens. Delivery of goods and services that are needed or desired by consumers rely on a strong effective road network. The continued efforts to deny the presence and continued use of motorized vehicles (regardless of power source) makes no sense. There is no viable means in which to transform our society to a vertical living environment with absolute reliance on walking and bikes (or solar powered moving walkways). It is not reasonable within the near future and probably not in the long term. It's time to acknowledge reality and get on with life as we know it and not as we might wish it could be...

O-092-079

Page 60 Goals

Goal: The statement is a statement of fact. Unfortunately, the drafters do not recognize it as such.

O-092-080

MPP-EC-1

"Family wage jobs" is not defined. Would it not be more reasonable to first support existing business and their growth and then target business that are actually a wealth generator for the region? Of interest, although the preceding discussion spent much effort to discuss "cluster industries" the policy reverts to the more basic "family wage jobs" criteria.

O-092-081

MPP-EC-2

Instead of trying to use government to "help" business, why not have a policy that minimizes the impact of government on business? There is almost no action that can be taken by government that will aid a business other than to rescind previously passed regulation. The market place, when not encumbered by government regulation and assistance, seems to thrive very nicely.

O-092-082

MPP-EC-3

Why "cluster industries"? Why not any industry that generated wealth retained in the state and region and provides jobs that allows its employees to live here? The emphasis on clusters confuses the real concepts of economic development. Provide reasonable opportunity for business and let them decide who will come.

O-092-083

MPP-EC-4

This policy requires expenditure of public funds for fishing expeditions. If we simply make the business environment friendly and competitive with other states we will succeed. Once we start the "incentives" route we are stuck with that mode of operation. We would be better served by investing in infrastructure than incentive programs. Incentives only work for one business, infrastructure works for everyone.

O-092-084

O-092-079 Comment noted. VISION 2040 does not intend to deny the presence of motor vehicles.

O-092-080 Comment noted.

O-092-081 VISION 2040 does address this issue by providing two definitions in a sidebar on the same page as the policy as well as inserting them in the glossary. The policy does support existing businesses and their growth and then discusses recruitment.

O-092-082 VISION 2040 promotes collaboration among the public, nonprofit, and private sectors, rather than simply minimizing impacts on business.

O-092-083 See Prosperity Partnership's Regional Economic Strategy, as well as the Issue Paper on Economics.

O-092-084 Successful economic development requires more than just a friendly business environment and infrastructure. Do not concur.

MPP-EC-5

Great policy statement but it requires action at the state and county government level to happen. Why is the policy not written as a directive to make changes at the state and county level?

MPP-EC-6

While this policy recognizes in part the absolute need for a robust transportation infrastructure to move goods and services, it is contradictory by almost every other policy dealing with development. Goods and services move primarily by road to and from industry and businesses. Consumers reach business by road or are serviced by business over roads. Please note that pedestrian and bicycling mobility play a very small part in the movement of goods and services. The presumption that "centers" will be the origin and destination of major shipments of goods and services only works if those locations are created and then designated centers. Make it simple and work for an effective road system that supports movement of goods, services, and people into, out of, and throughout the region.

MPP-EC-7

Please see the comments for EC-2. The policy will soon become regulatory rather than suggestive and contrary to the basic goals for economic development. Place some trust in businesses to be responsive to market place demands and to act responsibly as good neighbors and good stewards. It is time to get over the "Business is evil" approach. This policy is not a proper function of government.

Page 61 People

Page 61, paragraph 1

"Whereas the region's economic prosperity was once driven by natural resource extraction and industrial scale manufacturing…" Please note that much of that economic prosperity was sacrificed at the altar of "environmental protection" although there has never been clear evidence that irreversible harm was done or that business was not willing to learn. The demise of the natural resource industries in the state continues to hamper our ability to encourage new business into the area.

Page 61, paragraph 2

"....investment in all of the region's people to create shared prosperity" The intent and meaning of this statement is not clear. What kind of investment is considered? What is the meaning of "shared prosperity"? If the function of government is to provide for equal opportunity for all how can government be involved in outcomes? What role does personal effort and commitment play in policies?

Page 61, paragraph 2

O-092-085
O-092-086
O-092-087
O-092-088
O-092-089

O-092-085 Multicounty planning policies already do apply at the county level. Regarding the state, see RCW 36.70A.103.

O-092-086 Do not concur.

O-092-087 VISION 2040 promotes collaboration between business and government, and this policy has been revised.

O-092-088 Comment noted.

O-092-089 See Prosperity Partnership's Regional Economic Strategy.

"Investing in people means ensuring accessible and high quality education and skills training programs ...." Our state Constitution (directive from the people to their government) makes providing a basic education for all citizens a paramount duty of the state. Why is it necessary for the region to relieve the state of that duty? What is the meaning of "skills training" and why is that not the responsibility of the private sector? If this is to become a regional responsibility, who will provide the training, what training will be provided, and how will it be funded?

O-092-090

O-092-090 See the Prosperity Partnership's Regional Economic Strategy and its materials related to education and baccalaureate degrees.

Page 61, paragraph 3

Nice prose. So what? When did government get the job of being senior nanny for the citizens of the region. Government provides for some basic protections in individual rights (check Article I of the Constitution) but it is not responsible for cultural integration and hand holding.

There are plenty of community service and support agencies operating operating in the private sector to help those who actually need and want help. Let those agencies do what they do best and keep government out of it.

O-092-091

O-092-091 Comment noted.

Page 61 Goals

Goal: "investing in ...people"- What exactly is the definition of "investing" and what is the source of investment funds? Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy?

O-092-092

O-092-092 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008).

MPP-EC-8

"....creates widely shared prosperity" Exactly how does government do this? Prosperity is normally directly related to personal effort and taking advantage of opportunity. Does this policy envision some other methodology? If so, what is that methodology and what part does personal effort play? What is the specific GMA requirement for this policy? What is the fiscal impact of this policy? How will this policy be enforced or measured for success?

O-092-093

O-092-093 See response to O-092-092.

MPP-EC-9

Education is the primary responsibility of the state. This policy is unnecessary.

O-092-094

O-092-094 Education is a key goal of the Prosperity Partnership's Regional Economic Strategy.

MPP-ECC-10

Exactly what types of training programs are included in this policy? Who is responsible for determining the needs of the programs and training to be provided? Who determines the success of the program and how? How is the program funded? If this is not a private sector responsibility, why not?

O-092-095

O-092-095 VISION 2040 promotes a public role in these types of activities, recognizing the importance of the issue to economic development. This is a long-range regional vision and does not contain (or prescribe) the details you are seeking.

MPP-EC-11

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? Please define specific "disadvantaged" communities and the levels of support that are intended for each. If effective support programs already exist through community support organizations or private sector programs, how do they fit with this policy?

O-092-096

MPP-EC-12

Before we spend a lot of capital trying to fit round business pegs into square community holes, would it not be better to assess why an area is economically distressed? If the distress is the direct result of previous government action, does it not make more sense to reconsider the action than to rebuild the world? Perhaps properly defining the problem, rather than reacting to symptoms will provide a better result.

O-092-097

MPP-EC-13

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? While the policy may be admirable as social engineering, a historically proven and effective method of economic advancement is called assimilation.

O-092-098

Page 61 Places

Page 61 paragraph 1

"The region's diverse communities and natural setting are assets that make us a magnet for growth." Unfortunately, this section is supposed to deal with economic issues and not just population. The policies contained in this document will not generally lead to easy and willing economic growth.

O-092-099

Page 61, paragraph 1

"Protecting and enhancing our environment". This statement strengthens the comments above. Businesses are environmentally friendly in today's market place. They do not need to be forced to comply with the same elements that are demanded of them by global markets. They need not be forced to run a gauntlet of "environmental" regulations and studies just to begin a business startup. Faced with those constraints, businesses will, as many have already done, go elsewhere. While we may consider ourselves lucky because we did not get a business that was not willing to protect the environment, we will never know if that is true. What we will know is that we did not give the business an even chance and we do not have that business in our region.

O-092-100

Page 61, paragraph 1

The discussion continues to stress maintaining a community's distinctive identity. In fact, implementation of the policies in this Vision document will result in keeping the signs at both ends of the community the same but completely revising the look and character of the community. It is not possible to hold UGA boundaries firm, introduce major

O-092-101

(Comment continues on following page)

O-092-096 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008).

O-092-097 Comment noted.

O-092-098 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008).

O-092-099 The word "growth" in these policies refers to economic as well as population.

O-092-100 Comment noted.

O-092-101 Do not concur. Growth can cause change, and the policy promotes an approach that protects and leverages key assets.

population and job increases, foster pedestrian, bike and transit as the means of transportation, and end up with the same or even a close approximation of the same community.

Continuation of O-092-101

Page 61, paragraph 2

"....ensuring an adequate supply of housing to support job creation" How is this to occur? Developers will normally lag need so as to minimize capital risk. The only way to have housing before jobs is through government (taxpayer) funded programs. Is this what is intended? If so what level of housing availability will be ensured and how will location be determined? Has it occurred to the drafters that this concept is directly contrary to that of personal choice in housing?

O-092-102

O-092-102 Government funded programs are not necessarily the intent of the policies. However, governments may play a role in a housing strategy.

Page 61, Paragraph 2

The majority of the paragraph concentrates on the significance of centers as the economic development focal points. Once again, the concept is not one addressed in GMA and there is no real assurance that the centers already identified are the locations of choice for business. What will happen when businesses do not want to locate in designated centers? If businesses do not locate in centers how will housing for employees be provided? How will infrastructure needs be supported? Who makes the decision to deny a construction permit to a business that wants to startup in a location other than one dictated by government? What is the potential fiscal impact of this kind of approach? What makes centers so important that they override historical precedent and common sense?

O-092-103

O-092-103 Comment noted.

Page 62, paragraph 1

That Vision 2040 recognizes the role of resource based economic activity is greatly appreciated. After all RCW 36.70A.020(8) identifies Natural Resource industries as a specific non-prioritized GMA goal. Perhaps the drafters could demonstrate a bit more deference to the goal by making it a bit more prominent in the economic development section. That would probably conflict with the absolute concentration on saving the environment which appears to be the primary concern of the Vision.

O-092-104

O-092-104 Policies in "places" section go from general to urban to rural to natural resources, reflecting economic and population activity levels. Do not concur.

Page 62 Goals

Goal: The regions economy prospers when current business is allowed to grow and thrive and new business finds this a desirable place to locate. The goal statement is worded as a statement of fact. The goal statement is a combination of social engineering, environmentalism, and emotional brainstorming but holds little economic basis. Please cite the economic reference for the claims made in the goal statement. Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy?

O-092-105

O-092-105 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008).

MPP-EC-14

What does this policy mean? How would it be implemented? How is it possible for business to respect an intangible concept (environmental quality) and how would that respect be quantitfied? Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy?

O-092-106

MPP-EC-15

This policy has no meaning whatsoever as relates to economic development. Further, the policy is little more than a regurgitation of environment activist dogma. The policy appears to be little more than a restatement of numerous policies in the Development Patterns section. The terminology used in the policy is government babble, without real meaning or definition. Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy?

O-092-107

MPP-EC-16

This policy appears to be at odds with development policies that direct almost all economic development to centers or UGA. Resolve the matter. Please explain how forcing business into "centers" will encourage them to locate in the region or ensure their success. Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy?

O-092-108

MPP-EC-17

This policy, similar to the population "focus" in centers does not recognize the role played by business in their decision about location. If you really want meaningful economic development be prepared to warmly greet every wealth generator who shows up on our door step with a friendly smile and the question "What do we need to do to have you join our community?" What is the GMA requirement for this policy? What is the fiscal impact of the policy?

O-092-109

MPP-EC-18

Please refer to the comments on EC-17. Housing and/or good transportation infrastructure needs to support business, where ever they choose to locate.

O-092-110

MPP-EC-19

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? What is the model of success for this type of policy? How will the success of this policy be measured? Please refer to RCW 36.70A.011 and .030(15).

O-092-111

O-092-106 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008). This is a revision to an existing policy adopted in the 1995 VISION 2020.

O-092-107 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008). This is a revision to an existing policy adopted in the 1995 VISION 2020.

O-092-108 This policy is consistent with other policies related to centers. The policy is not intended to "force" growth. This is a revision to an existing policy adopted in the 1995 VISION 2020.

O-092-109 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008). This is a revision to an existing policy adopted in the 1995 VISION 2020.

O-092-110 Comment noted.

O-092-111 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008). This is a revision to an existing policy adopted in the 1995 VISION 2020.

MPP-EC-20

This is not the wording used by GMA or in compliance with the spirit and intent of GMA. Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy?

Page 62 Overview

Once again the "actions" paragraph introduces elements not previously discussed. For example:

"Prosperity Partnership Implementation actions" It is not clear how this document is used with the policy statements and what authority the "actions" have. Since there is no real discussion of the role of the Prosperity Partnership and its relationship with PSRC or any of the member jurisdictions, it is certainly not clear how the "implementation actions" become a part of the MPP.

Regional assessment of local ...." Once again it is not clear how or why it is necessary for PSRC to exercise "oversight" on local jurisdictions. That is not any authority assigned by law and not an authority that can be delegated by local jurisdictions to any non elected body.

"Report on educational..." This is a responsibility of the local school districts of for the state for colleges and technical schools. If the schools in question are privately run, the information will not be available except as determined by that school. It is not clear why PSRC need be involved in this matter.

"Maintenance of a regional economic clearing house" This does defy understanding. If there is a regional economic development organization, this responsibility should belong to them. If it does not, exactly what value added does that organization provide? If PSRC has this responsibility, who pays for it? What section of GMA requires this type of "clearinghouse"?

"County Planning Policies and comprehensive plans". Once again this appears to be a review and oversight role not supported by law. There can be no reason for PSRC to review the work of any legislative body.

Page 62 Monitoring paragraph

There is nothing in this paragraph that would qualify as valid monitoring of any of the measures or policies contained in the section. The items described are little more than busy work for a staff. None of the elements would support a valid analysis of the actual effectiveness of any one policy or lead to any conclusion regarding corrective measures for policies not working.

Page 63 Transportation

Overarching Goal. The term "Multimodal transportation system" is not defined clearly and allows considerable latitude in the understanding of the goal. Please provide a definitive meaning for "Multimodal" as it would apply to transportation systems of primary

(Comment continues on following page)

25

O-092-112
O-092-113
O-092-114
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O-092-116
O-092-117
O-092-118
O-092-119

O-092-112 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008).

O-092-113 See Prosperity Partnership's Regional Economic Strategy website (prosperitypartnership.org/strategy/index.htm) for more information. All actions have been moved from an appendix into their respecitve policy sections.

O-092-114 Intent is not "oversight," but to assess programs and look for best practices.

O-092-115 Education is a key goal of the Prosperity Partnership's Regional Economic Strategy. See website (psrc.org).

O-092-116 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008).

O-092-117 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008). "Review" does not imply oversight.

O-092-118 Monitoring provisions have been moved to Part IV: Implementation.

O-092-119 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008). VISION 2040 defines "multimodal" in the glossary.

interest to this document. There is no need to address Logistic multimodal concepts although a discussion of that subject might allow readers an opportunity to more clearly understand the failings of this document with regard to economic development and provision of goods and services throughout the region.

Page 63 paragraph 1

Is there a section or sub section of this document that will fail to tell me how important it is to inform me of the critical link to our environment in everything we do? Do the drafters recognize that human beings are as critical a part of that environment as any other element? If not, where are humans considered in environmental issues?

Page 63, paragraph 2

Vision 2040 establishes long-range regional direction .....in the Metropolitan Transportation Plan". PSRC does not have the legislative or other lawful authority to provide direction to any other elected jurisdiction. PSRC may recommend but it may not direct. (More later on the extortion capacity held by PSRC). A close review of the MTP indicated that it is applicable to Pierce, King, and Snohomish counties. It does not appear that Kitsap County is a player in that Plan.

Page 63 Paragraph 3

"Strained our transportation system" The system was strained because of a combination of growth and failure to maintain pace with road construction. Most recently, the diversion of funding and effort from roads to mass transit and light rail and the use of available funds for restricted travel lanes did little to relieve the problem. Of note "the increase of the number of people per household commuting to work" is offset by the taxes collected from the businesses at which those people were employed and the additional gas and road fund taxes collected. Let government take credit where credit is due - Proper prior planning precludes poor performance, or in this case, the inverse.

Page 63, paragraph 3

"The pattern of urbanization .... Increase the use of automobiles for meeting our daily needs" This trend of "personal choice" a freedom enjoyed by most Americans, began shortly after 1945, some 60 years ago. No matter how hard you try, the urbanization of America can not be made a huge error or an evil outcome. If it were as simple as PSRC offers – use of automobiles to meet our daily needs- we would still be single car families. In fact, the automobile is as much an American institution as the single family home with yard, the summer vacation, and driving to the shore on the weekend. The question is not how do we reduce the number of cars driven by Americans but how do we better accommodate people and their cars in a cost effective manner.

Page 63 paragraph 4

"....one third of the population does not drive." Nice try. Please delete all who are under age, unable to drive because of physical disability or age; those whose license has been revoked; those in prison or otherwise not allowed to drive and present the number who actually do not drive, as a matter of choice. You do not build integrity by trying to offer statistical data that you know to be flawed and misrepresenting reality.

Continuation of O-092-119

O-092-120

O-092-121

O-092-122

O-092-123

O-092-124

O-092-120 VISION 2040 recognizes that human beings are part of the environment.

O-092-121 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members. PSRC serves as the MPO under federal law and the RTPO under state law. Both the MPO and the RTPO serve King, Kitsap, Pierce, and Snohomish counties. The Metropolitan Transportation Plan is prepared in response to MPO and RTPO legislation (also, see response to O-092-008).

O-092-122 Comment noted.

O-092-123 The transportation policies address cost-effectiveness, as well as efficiency, choice, and other social, environmental, and economic issues.

O-092-124 The ability to drive is a different issue from choosing to drive. VISION 2040 discusses transportation needs for both.

Page 63, paragraph 5

Once again the statistical data provided does not make sense. If we are to see a growth of 1.7 million people and 1.2 million jobs, the majority of our population base will be of working age and potential car drivers. If, as asserted, the number of individuals living in poverty will increase, perhaps we should look at existing social programs to find the reasons for failure and implement corrective action. In a prior section we implemented policies to make sure that those living in poverty would share in the prosperity and be a part of the mainstream. Were the policies in error? Have we determined that those polices will not work even before they are implemented?

O-092-125

Page 63, paragraph 6

This paragraph is another of those political agenda paragraphs that has no place in this policy. For example;

The known petroleum reserves of the world today are greater than they were 20 years ago. Numerous of those reserves have not been exploited for political reasons. If resources are becoming scarce that is a political decision not a limit of resources.

Half of the sources of green house gases is far different from half of the gasses. What are the products of green house gasses, natural and otherwise? The internal combustion engine is the prime mover for our economy in the region and world. Not one truck, plane or ship moves in or out of the region that an internal combustion engine is not involved. Not more than a few years ago a major effort was made to shift from gasoline to diesel because it was "cleaner". Of course technology gave us cleaner gas engines and we are stuck with diesel engines that never wear out.

"There is a growing urgency in the region" By whom? And what is the reason for this "urgency"? It is not clear that average citizens are actually deeply concerned about the horror stories of the environmental activists. Automobile use does not appear to be declining significantly and people appear to be willing to pay the price for gas to maintain their individual mobility.

"It includes the design of walkable cities and bikeable neighborhoods as well as using telework and other travel options" The reality of life is that, for the near future (through 2010) short of a major technological break through, we will still be driving cars and making personal choices. The vision PSRC offers requires a major societal revision as well as major reconstruction of existing cities. It's not a matter of trying to reverse the tides; it is a matter of recognizing the reality that exists today. Just in case PSRC missed the news report, since 2000 95 percent of the population growth in Portland has been outside the city limits, As of August 14, 2007 the traffic congestion from Wilsonville to North Vancouver has not diminished.

O-092-126

Page 63 BOX

Metropolitan Transit Plan – close review indicates that Kitsap County is not a participant in this plan.

O-092-127

O-092-125 Comment noted.

O-092-126 Comment noted.

O-092-127 Kitsap County is a member of PSRC (which serves as the MPO and RTPO for King, Kitsap, Pierce, and Snohomish counties). Kitsap County has been a member of PSRC and predecessor agencies since the 1950s, and has been a member during the development of the Metropolitan Transportation Plan and each of its subsequent updates.

Goal: "maintain and improve its existing urban and rural transportation systems" – the GMA requirement for concurrency already covers this, except that it deals more directly with infrastructure and levels of service. This goal does not appear to meet the spirit and intent of GMA. Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter.

Page 64, paragraph 1

"Together Vision 2040 and the MTP" First, it does not appear that Kitsap is a participant in the MTP. Second, it is not clear how the MTP has standing in this document. Exactly what federal and state laws are being considered in this section? What are the specific requirements of those laws? What role does "air quality" have in land use regulation? Exactly how does all the material in this section fit under a GMA umbrella?

Page 64, paragraph 1

"That plan (vision 2040?) identifies priorities and action steps.... for major projects and programs... " How does a vision statement become an action directive for specific projects and programs? What is the specific authority under law for PSRC to direct investment decisions? Exactly what section of GMA provides for the actions described in this section?

Page 64 Regional Approach

Page 64 Paragraph 1

Vision 2040 calls for ".... multimodal transportation system..." Please identify the specific GMA requirement for this multimodal system. What is the specific definition of multimodal transportation system as used in this document? What is the fiscal impact of the system being discussed?

Page 64, paragraph 1

"Designated regional and sub regional centers are the focal points of ....and are connected by frequent and fast high-capacity transit and other transportation infrastructure." Once again the Vision deals with elements not a part of GMA. What are sub regional centers? How do they differ from regional centers and how are they established? The complete statement, as written, appears to presume a level of fact that does not exist and which is not properly justified by specific example. If that is the case, is this another instance of assumption being treated as fact and then being used as the basis for policy decisions? Please explain exactly which "centers" exist today as actual focal points of cultural, civic, and economic activities within urban areas. For the policies of this document to be reasonable, such conditions must exists throughout the region and not be future goals and objectives.

Page 64, paragraph 1

"Communities and neighborhoods should have easy access to the regional system through local transit, improved roadways, sidewalks, trails, and paths." The total concept is beginning to lose credibility. I leave my home, properly attired for work, and walk, bike

(Comment continues on following page)

O-092-128

O-092-129

O-092-130

O-092-131

O-092-132

O-092-133

O-092-128 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008).

O-092-129 Kitsap County has been a member of PSRC, and its predecessor agencies, since the 1950s. For more information on the relationship between Destination 2030 and VISION 2040, see the Final EIS Chapter 3. See also SAFETEA-LU, RCW 36.70A, and RCW 47.80.

O-092-130 Previous responses used citations.

O-092-131 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008).

O-092-132 VISION 2040 has addressed this issue in the Regional Growth Strategy and the Development Patterns sections. Also, the purpose of VISION 2040 is not to merely describe existing conditions, but envision future conditions.

O-092-133 The narrative describes a system that allows, not forces, choices.

or drive my car to get to the "regional" transit system. Where I park my bike or car is not clear. How I do this year round especially in the dark inclement months of winter is not clear and why I would choose to do this at all is not clear. Today, it is not uncommon for ferry riders to have a car on both sides of the Sound. The number of persons using bikes as primary transportation even with ferry service to cross the sound is very small. This entire concept needs to be revisited to determine if it is sound policy or just political agenda or personal dream being expressed as policy. The real bottom line is -who is going to actually comply with the policy, short of being given no other choice?

Continuation of O-092-133

Page 64, paragraph 2

"Vision 2040 addresses the critical transportation function of moving freight, goods, and services." And " .... Use a complex system of roadways, rail lines, sea and air routes, and the intermodal terminals that connect them" There is no indication anywhere in the document to this point that any consideration has been given to the significance of the movement of goods and services into, out of, or through the region. The consideration of through processing is significant from a higher level economic perspective but the entire system is reliant on effective, functional interior systems of roads. Approximately 30 percent of the material received in the region's ports remains in the region or in close proximity. Effective movement of that material depends on local roadway systems. Twenty and forty foot containers do not travel on busses or bikes.

O-092-134

O-092-134 VISION 2040 has addressed this issue. See Economy section, and freight policies in the Transportation section.

Page 64, paragraph 3

"To support GMA objectives .... Establishing a more user-oriented, balanced transportation systems..." Please provide the specific GMA reference for this statement. What is the definition of "user-oriented"? What mode of transportation could be more user-oriented than the method of choice for the overwhelming majority of current users; their cars?

O-092-135

O-092-135 VISION 2040 has been revised to address this issue.

Page 64, paragraph 4

"A balanced system provides opportunities for selecting among different travel options" What is the specific GMA reference for this approach? Are a full range of travel options not available to people today? Do we not have effective transit systems, ferries, and walkways? Do we not have opportunities for those who wish to use bikes to do so? Exactly what is missing from the travel option mix that will be incorporated by the policies of this document? What is the fact base that makes it clear that the added options will modify the travel option choice decisions of a significant number of citizens? What is the cost of adding new options?

O-092-136

O-092-136 See RCW 36.70A and RCW 47.80. Also see the Issue Paper on Transportation.

Page 64, paragraph 5

The basis of this entire paragraph appears to be that by making improvements to existing "alternative" travel options a major revision in travel choices will occur. If all of the options are available today and not being used at capacity, and if no significant change will occur over the vision time line to modify the actual travel needs of individuals, how does this proposal work? It does appear that the actual basis of the planning is to concentrate available funding and effort on "alternative" travel modes while making minimum investment in actual basic transportation infrastructure so as to drive choice. Which then begs the question, if an individual can access the existing transit

O-092-137

O-092-137 See response to O-092-136.

(Comment continues on following page)

system by walking, bike, car to park and ride, and in doing so not be "forced" to use POV as the primary means of transportation why do they not do so? Is there a fatal flaw in the basic underlying assumptions on which the policies are devised?

Page 64 BOX

Regional Guidelines and Principles

"PSRC is required to certify ..." What is the specific reference for this requirement? Where is that requirement in GMA? Where is the GMA requirement of authority for PSRC to exercise review authority over any city or county comprehensive plan? The entire paragraph cites GMA requirements but provides no clear reference for such action. What is the authority delegated to PSRC in this matter? Where does that authority come from? How is it codified? How is it exercised? As an aside, once again, it is not clear that Kitsap County is a party to the MTP.

In the second paragraph the explanation of the use of the * is not appropriate. The vision document attempts to meld various actual or assumed authorities in support of positions taken and policies directed. In fact, the requirements under GMA, other state transportation legislation and federal law are not necessarily mutual or consistent with one another. PSRC is trying to meld several "hats" under this document and the effort is both confusing and inappropriate. For every policy that is offered to be necessary to be incompliance with either state or federal transportation law or with GMA a separate identifier should be used. For example * = federal law, #= State transportation law, and @- GMA. Further, in a separate appendix to the Vision document a cross reference to every legal requirement cited by chapter and verse should be provided. It is fully inappropriate to expect that any reader or user of the Vision document will be required to second guess the drafters intent with regard to implementation of law.

Page 66, paragraph 1

"Federal transportation law mandates making maintenance, preservation, safety, and optimization of existing transportation infrastructure a first priority" If this is the case, why are we not in compliance with the law? Existing infrastructure includes our failing roadway system. Why are we placing greater priority on mass transit, new light rail systems, restructuring neighborhoods for alternate transportation options and building new trails and paths for bikes and walking? What part of the federal law on priority is not understood?

Page 66. Paragraph 2

"They can increase the capacity of transportation facilities..." With respect to the existing "alternate" transportation options, the issue is not insufficient capacity. Those options are not operating at or near capacity and that are not functioning at designed cost effectiveness. Continued efforts to increase capacity are of little value if those "options" are not options of choice.

Page 66, paragraph 2

"...traffic signal optimization, restructuring transit services, transit signal priorities, road or lane pricing,..." How do these methodologies increase the effectiveness of existing

(Comment continues on following page)

30

Continuation of O-092-137

O-092-138

O-092-139

O-092-140

O-092-141

O-092-142

O-092-138 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008). See RCW 36.70A and RCW 47.80.

O-092-139 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008). See legal framework in VISION 2040.

O-092-140 While the text describes the "first priority," nothing constrains this to being the only priority.

O-092-141 Comment noted.

O-092-142 VISION 2040 does not promote making personal vehicle as primary transportation more difficult.

transportation systems? In each case, the methods identified are specifically designed to make it more difficult to use a POV as primary transportation. If the underlying intent is to eliminate the POV, why not have the courage to implement a basic policy that reads "The POV will be effectively eliminated as the primary means of transportation within the region"? It would be interesting to see the reaction to such a policy? Has there been any consideration on the economic impact on elimination of POV use? If so, what is the extent and value of that impact?

Continuation of O-092-142

Page 66, paragraph 3 and 4

The discussion of "demand management" strategies in these two paragraphs is interesting but misleading. If the region has been at the forefront of the methodology since the 1970s (some 40 plus years) but has achieved such poor overall results, there must be some question about the general philosophy behind the concept or the manner in which it has been implemented. Regardless of a very limited vanpool success (relative to total commuter numbers) and without discussing the actual cost of the program, no significant revision in travel choice or timing has resulted. While some success may have been experienced through implementation of some of the management practices, the overall effect of the program has been negligible. To continue to beat this horse after 40 years of non productivity is not reasonable.

O-092-143

O-092-143 Comment noted.

Page 66 BOX Management and Operations

"Commute trip reduction law requires larger employers to encourage…" The wording is important. The number of employers who fall under coverage of the law and the specific parameters of the law make the program a virtual paper tiger. Businesses must operate in a manner that is consistent with best return on investment. This is another of the regulations, well intended as it might be, that is not consistent with the concept of a business friendly environment.

O-092-144

O-092-144 Comment noted.

"PSRC's Congestion Management Process…" What is this? It has not been identified or discussed previously in the document. What is the specific requirement for the "process" and its application? Who actually does the data collection and analysis? How is this paid for? What is the actual cost? What success has been demonstrated by the process to both identify congestion and provide a cost effective, workable solution that has actually relieved the problem?

O-092-145

O-092-145 See Destination 2030, 2007 update for more information.

Page 66 paragraph 5

Please see the comments above about the Commute Trip reduction program. Exactly what success has been achieved by the program? What is the actual number of trips eliminated?

O-092-146

O-092-146 See Regional Transportation Demand Management Strategy for more information.

Page 66, paragraph 6

With respect to reduction of vehicle miles traveled, please provide the specific data or a useable reference. It appears that the information is contrary to that available from other sources that indicate that while there might be some temporary down spikes in driving with elevated gas prices, overall miles traveled and vacation miles continue to increase.

O-092-147

O-092-147 See Destination 2030, 2007 update for more information.

(Comment continues on following page)

It would be inappropriate to establish a long range policy on data associated with a short range or non-sustainable occurrence.

Page 66, BOX State Highway Safety Plan

"Target Zero" has not been previously discussed and has no obvious application in this document. If the Plan deals with reducing road miles driven as a means to reduce accidents and fatalities, it is both wrong headed and inappropriate. Perhaps if the issue of safety were addressed from the stand point of safer cars (read stronger and designed to survive impact collision), better roads (fewer potholes, better marking, more effective divider systems, better signage, etc), and better driver qualification and training (DUI's off the road, uninsured off the road, etc) the rate of success might be higher. Of course, the political cost off such actions would probably not be acceptable to elected officials.

Page 66, paragraph 7

"Vision 2040 addresses…." The purpose of this paragraph is not understood. If it is intended as a "wrap-up" it appears to include new material not addressed previously in the section. If it is a stand alone statement it lacks the substance of justification and factual support. The paragraph does not appear to add anything to the discussion and should be deleted.

Page 67 Goals and Policies

Goal: "…in a safe and useable state" Please provide the specific GMA goal associated with this goal. As stated, the goal does not appear to have any substantive meaning. What is the specific definition of "safe and useable"?

MPP-T-1

This policy does not address cost effective transportation, as demonstrated through use. Further it does not recognize the constitutional requirements of Article 2, section 40. The term "transportation systems" as used in this policy is not defined.

MPP-T-2

How does this policy address the cost of road maintenance, improvement, and new road construction at the county and city level? Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? How will the investment be protected except by further expenditure of public funds? How did essential infrastructure, provided under the specifically delegated authority of the people, become an "investment" instead of a hard requirement for roads, bridges and ferries?

MPP-T-3

Please provide the specific reference in law for this policy. What is the specific GMA goal and reference associated with this policy? This policy appears to implement concepts not addressed or identified in discussion. What exactly are "pricing programs" and "system management activities" as applied to this policy? Who is responsible for implementation of those concepts? What is the fiscal impact of this policy?

Continuation of O-092-147

O-092-148

O-092-149

O-092-150

O-092-151

O-092-152

O-092-153

O-092-148 Safety is a requirement for MPO planning. Also see SAFETEA-LU under the state's Highway Safety Plan.

O-092-149 Consistent with other sections, this text concludes the narrative section and immediately precedes the policies that follow. Do not concur.

O-092-150 VISION 2040 has been revised to address this issue.

O-092-151 VISION 2040 has been revised to address an effective system.

O-092-152 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008). Also, see the State Transportation Plan.

O-092-153 To improve readability, VISION 2040 does not include citations for each of its provisions. See RCW 47.80. Also, see Destination 2030, 2007 update for more information regarding pricing programs and system management activities.

MPP-T-4

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? Just exactly how will this policy be implemented? Since the implementation of this program statewide, what has been the success of the program and what has been the cost? Are the cable barrier separators for major highways a part of this program? If the goal of zero traffic related deaths is really that important a goal for our state why not just eliminate all personal travel? O-092-154

MPP-T-5

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? Why is this policy included without prior discussion? Is this not a consideration of emergency management rather than land use or growth management? Survivability of infrastructure is an issue for design, construction and maintenance. If this policy is necessary should it not address those aspects of infrastructure rather than the meaningless policy to "protect"? O-092-155

MPP-T-6

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? Is this not the role of mass transit? O-092-156

Page 67 Supporting Growth Strategy

Page 67 Paragraph 1

"Land use patterns that support a variety of travel choices contribute significantly to improving accessibility and mobility" This appears to be an assumption stated as fact. What is the supporting data for the thesis? If in fact selection of travel option is a matter of choice, the availability of additional options does not dictate the selection or the result of that selection. May we infer from the statement that providing more bike paths in a community will in and of itself cause a substantive shift from an existing primary choice of transportation to bicycles? If so please provide the supporting data for that claim. O-092-157

Page 67, paragraph 1

"Promoting options for making short, localized trips by locating stores or offices near homes and building sidewalks to bus stops, are effective ways to promote walking, bicycling, and using transit" There is a basic fault with a concept that relies on promoting one thing to promote another. The statement does not recognize the marketing concepts of store or brand loyalty, or the "soccer Mom" concept of parallel/serial transportation planning. To be effective, the proposal would require transit systems far more expansive that currently available in most cities and counties of the region. The continued concentration of effort to bring effective mass transit to cities and centers at the expense of providing basic infrastructure to rural areas is not acceptable. O-092-158

O-092-154 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008).

O-092-155 To improve readability, VISION 2040 does not include citations for each of its provisions. See Destination 2030, 2007 update regarding requirements for MPOs to plan for the issue of security. See the federal SAFETEA-LU legislation and the Issue Paper on Transportation.

O-092-156 To improve readability, VISION 2040 does not include citations for each of its provisions. Also, note that planning for special needs populations goes well beyond transit. See the Issue Paper on Transportation for more information.

O-092-157 A body of research supports the concept of a land use and transportation connection. Do not concur. See the Issue Paper on Transportation for more information.

O-092-158 Comment noted.

Page 67 paragraph 2

"This means projects and programs that support major freight and goods movement, as well as investments that improve access to job locations and residential access to good and services." The only way this happens is with an effective system of roads and streets that connect all sections of the region as well as providing for more direct movement of freight between intermodal points. This statement appears to be at odds with almost everything else in this section and throughout the Vision document. Of the 14 policies that follow this discussion, not one clearly and unambiguously supports the concepts of this paragraph.

O-092-159

Page 67, paragraph 3

"Since transportation programs and projects are supposed to support social and economic activity...." Please provide the specific GMA requirement associated with this statement. What exactly does this statement mean with respect to supporting "social activity"? How is this to be implemented? What is the anticipated cost of meeting this requirement and how will it be funded?

O-092-160

Page 67, paragraph 3

"This includes addressing transportation –related impacts on air quality and climate change through planning and design." What is the specific GMA requirement for this action? Exactly what impacts on air quality are included and why are they not covered by air quality standards? What specific climate change elements are to be considered and how are they to be quantified? What is the scientific source of information as required by RCW 36.70A.172 or is that reference not considered appropriate? Who will exercise monitoring authority for the process and where will funding come from? What is the anticipate cost of implementing these requirements?

O-092-161

Page 67, paragraph 3

"Environmental consequences... should be carefully evaluated against the benefits of transportation projects and programs" Exactly what does this sentence mean? What is the requirement under GMA to make such evaluation? How will the "evaluation" be made and by whom? What is the economic and financial cost of this proposal and who will bear that cost?

O-092-162

Page 67 BOX Transit-oriented Development

While the discussion contained in the box is interesting it does appear to be a bit out of context. The specific parameters and considerations of the study are not included so associating it to region conditions is not possible. The actual details of the transit oriented development that was considered is not provided and it is not certain if the discussion concerns new development or significant infill. Also missing is any discussion on the status of predevelopment transit use of option availability or the period of time covered in the study. There is also evidence that shows that some early results from infill and urbanization are short term as original residents elect to relocate to single family dwellings in more suburban areas. Also not discussed are the social problems associated with higher density urban living including law and order. Its not that the

O-092-163

(Comment continues on following page)

O-092-159 Comment noted.

O-092-160 This information provides context. To improve readability, VISION 2040 does not include citations for each of its provisions. For example, "activity" means movement. See the Issue Paper on Transportation.

O-092-161 To improve readability, VISION 2040 does not include citations for each of its provisions. This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008). VISION 2040 has been revised to more fully address climate change issues. See RCW 80.80.020.

O-092-162 To improve readability, VISION 2040 does not include citations for each of its provisions. The purpose of the text is neither to define nor to conduct the evaluation. See the EIS for data associated with environmental consequences of transportation. Also, see the Issue Paper on Transportation.

O-092-163 Text describes a fundamental component of MPO planning.

information provided is not correct it is that it is not complete enough to be used as the basis for planning.

Page 68 Goals and Policies

Goal: This goal does not address existing infrastructure and eludes discussion of roads. Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? Exactly how does this goal cover the economic growth needs of the region and individual cities and counties?

MTT-T-7

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? Individual counties and cities, to meet concurrency requirements, address planning through Transportation Improvement Programs that are specific to the jurisdiction. Why is there any need for county or city TIP to be the subject to regional discussion? King county residents do not pay Kitsap property tax to our road funds so they have no role in determining how we spend those dollars. If other counties desire to donate dollars to Kitsap for pet projects, arrangements can probably be made.

MTT-T-8

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? Of note, the primary player in this equation, the developer, has been excluded from the decision making process.

MTT-T-9

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? The exclusion of roads from this policy is both inappropriate and shortsighted. Our roads are essential to economic health of the state the cities and the counties. We have already lost one major business because, in part, of poor road systems and a failure to plan adequately for the future.

MTT-T-10

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? This policy is directly contrary to Article 2, section 40 of the Constitution. This policy has no real meaning in Kitsap County.

MTT-T-11

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? This policy appears to be contrary to most other transportation policies. Good transportation policy

(Comment continues on following page)

35

Continuation of O-092-163

O-092-164

O-092-165

O-092-166

O-092-167

O-092-168

O-092-169

O-092-164 Existing infrastructure was addressed in the preceding section. This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (see response to O-092-008). Also, the goal is not intended to cover economic growth of local cities and towns, but to provide a larger regional context.

O-092-165 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (see response to O-092-008). Also, coordination is a key requirement for planning under federal and state statutes. This is a revision of an existing policy. See RCW 47.80.

O-092-166 To improve readability, VISION 2040 does not include citations for each of its provisions. VISION 2040 should not be read as to change the role of development in the decisionmaking process. This is a revision of an existing policy. See RCW 47.80.

O-092-167 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008). The policy relates to all transportation investments. This is a revision of several existing policies. See RCW 47.80.

O-092-168 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008). Do not concur that this is contrary to the Constitution. This is a continuation of adopted policy based on several existing multicounty planning policies.

O-092-169 See response to O-092-168. Comment is unclear as policy does not discuss hubs or linkages.

does not just link hubs and ignore the remainder of the area. Good transportation policy recognizes reality and meets the needs of that reality. In reality this policy appears to be little more than a veiled attempt at extortion or coercion to force jurisdictions to adhere to policies.

Continuation of O-092-169

MTT-T-12

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? How is this policy to be implemented? How will success of this policy be determined? Does this policy depend on an individual worker making a lifetime career commitment to a single employer?

O-092-170

O-092-170 See response to O-092-169. See Destination 2030 for more information and data on transportation system usage. This is a revision to an existing policy adopted in the 1995 VISION 2020.

MTT-T-13

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? For each county and city of the region, what are the numbers of individuals who walk or bike to work, to shopping, and to all other family activities? What is the numbers who use public transit for those purposes? What is the numbers who use POV? In developing the number, any individual who uses POV for any key function is to be counted as part of the POV universe. How does this policy recognize and respect the freedom of individual choice or the choices that have already been made?

O-092-171

O-092-171 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008). This is a revision of an existing policy. See RCW 47.80.

MTT-T-14

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? Does this policy mean roads? It is difficult to understand the intent of the policy, how it will be implemented, or how success will be measured. Could the policy be written more clearly and in simple English?

O-092-172

O-092-172 See response to O-092-171. This idea was considered but the existing language was retained.

MTT-T-15

Once again this requires a robust road system. Beyond that, the "freight transportation system" is essentially private enterprise. This is a business issue not addressed in the economic development section. How is this policy not a part of MPP-T-14? If there is a difference, what is that difference and why?

O-092-173

O-092-173 See response to O-092-172. Policies address slightly different aspects, with one being broader and the other being more specific.

MTT-T-16

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? As written, should Burlington Northern/Santa Fe want to expand and should that expansion not be compatible with state, regional and local plans, the expansion could be denied. How is this good economic policy or good transportation policy? The real question must be who is responsible for economic growth, business or government? If the planners believe that government is responsible we have a much bigger problem that originally considered.

O-092-174

O-092-174 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008). See RCW 47.80. VISION 2040 promotes a collaborative approach to economic growth, including public, private, and nonprofit sector perspectives.

MTT-T-17

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? This is another policy that is contrary to a business friendly atmosphere. First, there are standards in place concerning pollutants and emissions that all businesses are required to meet. Each business will operate in a manner consistent with market forces and practices demanded by their customers. What is the specific value of this policy and how will it be implemented? If standards more stringent that those imposed by the federal government are implemented, what impact will that have on the economic vitality of the region?

MTT-T-18

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? Such constraints will most likely be contrary to cost effectiveness and efficient operation. Why is this policy necessary and how will it be implemented? What are some specific examples of how this policy applies? Who determines if the policy does apply?

MTT-T-19

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? Please explain the specific meaning and intent of this policy. There is nothing in the discussion that provides any clue to what is intended.

MTT-T-20

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? What is the specific intent of this policy and how will it be implemented? How will achievement of this policy be assessed? Does this policy include subsidized transportation for certain classes of individuals? If so how will those classes be defined, who will determine eligibility for inclusion, and will there be any time limit on support? If this policy does include subsidy, what is the plan to work out of the need for the policy?

Page 69 BOX PSRC Federal Funds Competitive Process

"PSRC has maintained a policy" What are the specific requirements under federal law and how does the PSRC "policy comply with the spirit and intent of the law"? Is the PSRC policy more stringent that required by law and if so, why?

"...Promote alternatives to SOV (Single Occupancy Vehicle) travel" While the PSRC policy may place priority on eliminating the dreaded POV/SOV, does federal law require such action? If this requirement is federal in nature, is it applicable only to those projects that are federally funded? Is there not some discretion in the application of the law and or policy? For example, the tunnel under construction in Bremerton is to relieve POV/SOV congestion associated with ferry traffic.

O-092-175
O-092-176
O-092-177
O-092-178
O-092-179
O-092-180

O-092-175 See response to O-092-173. VISION 2040 promotes clean transportation and it does not impose new standards. Also, see federal legislation in SAFETEA-LU. This revision is based on an existing policy.

O-092-176 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008).

O-092-177 See response to O-092-176. See narrative in development patterns sections regarding urban design.

O-092-178 See response to O-092-177. Policy does not address subsidized transportation.

O-092-179 This sidebar provided an overview of various processes conducted in 1995 under SAFETEA-LU preceding federal legislation.

O-092-180 Yes, there is discretion.

Page 69 BOX Freight Initiatives

The FAST Corridor does not include Kitsap County. Kitsap is served by a combination of Puget Sound & Pacific and US Navy right of way. The primary customer is the federal government. No major improvements to track coverage or service are anticipated to meet current economic needs.

O-092-181

O-092-181 Comment noted.

Page 69 BOX Context-sensitive Design

"Emphasis is placed on preserving the scenic, aesthetic, historic, and environmental resources of the community, while maintaining safety, accessibility, and mobility." This statement almost defies understanding. Where is the priority? Does not cost effective, safe transportation have equal or greater priority than saving a scenic view? If not, who makes the decisions on priority and how are the additional costs justified? At what point does common sense kick in to overcome meaningless emotional decision making?

O-092-182

O-092-182 This information is not meant to prioritize views over other considerations, merely to include these types of resources into the planning process.

Page 69 BOX Street Networks

This is a fine example of social engineering and political agenda overriding good engineering practices and common sense. There is apparently no bottom to the money well that will be used to implement these concepts. Exactly where in GMA are these concepts discussed or required? The issues identified in this box, while perhaps desired by one community, are not appropriate for being dictated to all. Of note, the requirement under RCW 36.70A.070(6)(a) (viii) is one to identify and designate planned improvements. It is not a requirement to divert essential and critical transportation or road fund dollars to pedestrian and bicycle facilities. Of further note, current state road maintenance and construction standards effectively limit creation of bike facilities on roads except as a part of major road improvement or new construction. Thus diverting funds from roads also diverts funding from bike facilities.

O-092-183

O-092-183 The text in the box is not intended to divert funds to these facilities.

Page 70 Greater Options and Mobility

Page 70 paragraph 1

Once again, this paragraph which appears to bring common sense to the discussion also appears to be totally out of sync with the remainder of the document. The paragraph is a clear statement of transportation needs.

O-092-184

O-092-184 Comment noted.

Page 70, paragraph 2

Unfortunately, this paragraph takes departure from the paragraph above it and returns to the exploitation of political agenda in place of proper planning. The opening statement that funds are limited followed by the statement of the need to concentrate funding where it will "bring greatest net benefits in supporting the region's growth and economic strategies" sets the stage for the continued emphasis for anything but roads. This is then followed by the self fulfilling prophesy that transportation capacity in the areas of highest density will be met by transit systems, walking, and bikes effectively eliminates any consideration of roads and cars. Then the revelation that there will be no expansion of rural transportation facilities without assurance of "no growth" seals the deal. This approach to transportation may be acceptable to the drafters and to some in King,

O-092-185

O-092-185 Comment noted.

(Comment continues on following page)

Pierce, and Snohomish counties, but it probably will not be well received in any rural area or in Kitsap County in general.

Page 70 BOX Transit Supportive Densities

Finally the link between land use and transportation used by the drafters and the need to make that link sacred is clear. The only way to impose exceedingly high densities within UGA is to provide a "factual" basis for those densities. What better way than to demonstrate that the only way to achieve effective and efficient transit is to concentrate people? The density levels identified in the box far exceed any normally associated with UGA at this time. It will only be a matter of time before they become universally adopted if this Vision document survives. Of interest, there is no supporting information regarding the need or desire for the densities specified beyond that associated with transit systems. In effect, the land use element of growth management, specifically regarding UGA, now shifts from the concept of "encourage" as used in the GMA to mandate as used in this document. It is very clear that the extortion and coercion factor of this document will be used to assure compliance.

Page 70 paragraph 3

This paragraph recognizes that the policies of the vision, if implemented will result in a decline of revenue for government. Unfortunately, there is no recognition of a decline in services required. The end result is the start of a new quest to find additional sources of revenue. Unfortunately, the only source of revenue for government is the taxpayer either directly or as a consumer. The end result of the policies will be a bigger bite from every individual with less choice and freedom to show for it. Why is that becoming a standard practice for government?

Page 70 BOX Variable Pricing

Call it what you will, this box does nothing more than describe several schemes to tax those who would use roads that they have already paid for to use them. Unfortunately, the taxation also becomes a double edged sword. The taxes are imposed to raise revenues to support transportation elements that are not self supporting. To increase the use of those transit systems initial subsidized travel will be offered. Taxes on SOV/POV will have to increase to cover the subsidies. As taxes are increased use will decline and revenue will decline, requiring higher taxes to maintain revenues. At some point, when transit use becomes a dependency rather than a choice, subsidies will be eliminated. In the end people get what they never wanted at a price they were never willing to pay. Call it variable pricing if you must but in truth it is little more than a progressive tax scheme to force behavior.

Page 70 paragraph 4

This is another of the ending paragraphs that has little or no meaning and serves little or no real purpose. The paragraph does not summarize the preceding parts of the section and adds noting of value to the discussion. Delete the paragraph.

Continuation of O-092-185

O-092-186

O-092-187

O-092-188

O-092-189

O-092-186 Comment noted.

O-092-187 Do not concur. The paragraph addresses the state gas tax and the fact that fuel efficiency simply translates into less gas usage, which in turn affects gas tax revenue.

O-092-188 Do not concur.

O-092-189 VISION 2040 was revised to address this issue.

Page 71 Goals and Policies

Goal: Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? What is the purpose of this goal? Is this not the meaning of concurrency as implemented in GMA? If it is not concurrency, exactly what is it and how does it differ? O-092-190

O-092-190 This is a goal, not regulation.

MPP-T-21

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? Can PSRC say "build new roads" or did I misunderstand the intent of the policy? O-092-191

O-092-191 This policy has been revised.

MPP-T-22

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? If rural residents pay road fund property taxes, why should they be deprived of the benefits of those taxes? Does this policy also mean that roads to support economic development in rural areas will not normally be allowed? Who determines if this policy is being implemented correctly? What happens if a county decides to build a new road that is not in full compliance with this policy? O-092-192

O-092-192 This policy does not eliminate the use of road funds. A portion of PSRC funds go to rural projects and programs.

MPP-T-23

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? How does this policy meet the needs and desires of citizens? What data is the source to justify policies that eliminate the POV as the primary means of transportation for individuals and families? O-092-193

O-092-193 The intent of this policy is not to eliminate the personal vehicle, but to provide alternatives for those who want or need them. This is based on several existing policies. See RCW 47.80.

MTT-T-24

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? Please explain how this policy complies with Article 2, section 40 of the Constitution? If this policy implements the "Transit-supportive Densities" as provided on page 70, what is the specific authority to provide such direction to local jurisdictions? O-092-194

O-092-194 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (see response to O-092-008). Also, see RCW 47.80.

MTT-T-27

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? This policy indicates use of public funds for private benefit. Would the policy not be better written to encourage and facilitate the desired action and then eliminate government regulation that makes achieving the goal difficult? Exactly what is the meaning of "mode" and "technology" as used in this policy? How does this policy cover the need for road systems to support local area's delivery of goods and services to meet the needs of both urban and rural areas? O-092-195

O-092-195 The use of the words "mode" and" technology" mean the type of transportation, such as rail or truck. This is based on several existing policies adopted in the 1995 VISION 2020. Also, see RCW 47.80.

MPP-T-28

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? This policy, as written, defies understanding. It would appear that the policy when implemented would provide for taxation of users at any tax level based on assessments made by government. Rewrite this policy in simple English using commonly accepted (by the public) terminology.

Page 71 Overview

Page 71, paragraph 1

What is the "Coordinated Transit-Human Services Transportation Plan"? How was it created? What is the requirement for the plan? Who maintains the data and analysis for the plan? How is that function funded? Why is the plan necessary and what value added does it bring to the process?

System safety trend reports, Freight and goods transportation recommendations, long range transit agency plans and regional ferry service plan all appear to be the direct responsibility of agencies other than PSRC. It is not clear why PSRC need be involved in those reports other than as an end user.

Guidance for local comprehensive plans regarding transportation is already available through application of the provisions of GMA. Why there is any need for PSRC to be involved in transportation planning for jurisdictional roads and streets in Kitsap County or for any non-federal roads in the county is not clear. If PSRC does have authority to provide guidance and direction to local jurisdictions in transportation matters, please provide the specific references.

Determination of PSRC role in disaster response and recovery is once again a major stretch beyond the original premise of growth management. There are several layers of emergency management throughout the state from the lowest jurisdictional level to the state level. There is no clear need for PSRC to have any involvement in emergency management.

"A regional bicycle signage program". Truly a "make work" effort if ever there was one. The opportunity to use international signals should more that satisfy the requirement. The thought that the taxpayers would actually be supporting someone to sit around and think up the "correct" signs to go on all bicycle paths or bike use areas throughout the region clearly demonstrates a complete loss of reality.

Page 71 Paragraph 2

Once again the discussion about monitoring provides no useful information and not the slightest idea of how implemented policies will be tracked and analyzed or assessed for effectiveness.

O-092-196
O-092-197
O-092-198
O-092-199
O-092-200
O-092-201
O-092-202

O-092-196 VISION 2040 was revised to address this issue. The language now clarifies the intent and adds detail for better comprehension. This policy is based on policy adopted in the 1995 VISION 2020.

O-092-197 See Destination 2030, 2007 update and related PSRC documents.

O-092-198 Comment noted.

O-092-199 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008). These statutes require coordination in transportation planning.

O-092-200 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008). Security is a required provision for MPO planning.

O-092-201 Comment noted.

O-092-202 Comment noted. The monitoring provisions have been moved to Part IV: Implementation.

Page 73 Public Services

Overarching Goal: The goal as stated is a deviation from GMA concurrency requirements and involves more that required by GMA. Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? Why should local jurisdictions concern themselves with providing public services that support regional goals? Local jurisdictions are limited to actions within their jurisdiction.

O-092-203

O-092-203 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008).

Page 73, paragraph 1
This paragraph describes a full range of services provided to residents of urban and rural areas. Of note, any number of the most significant providers listed are not a party to the development of these policies even though the policies would provide directive guidance to those agencies. It is a fallacy of the planning process to assume that an agency, such as PSRC, without clear legislative authority or jurisdiction over others that it could, by definition, impose direction over those jurisdictions. Don't be surprised if school districts, water districts and fire districts find these policies severely wanting and hesitate to comply with the policies.

O-092-204

O-092-204 Comment noted.

Page 73 paragraph 2

"Curbing the need for new infrastructure…..can be enhanced by taking advantage of renewable resources and efficient and environmentally sensitive technologies" Please explain what this means in simple English. New infrastructure requirements are based on growth and consumption or exploitation of existing infrastructure. While the life cycle of existing infrastructure may be extended or enhanced there is no way to realistically avoid new infrastructure requirements. If the intent of this paragraph is to reduce demand on water or sewage systems by enforced conservation, say so and identify how that will be achieved.

O-092-205

O-092-205 This paragraph has been revised. See the EIS on costs of public infrastructure, and the VISION 2040 Issue Paper on the Cost of Sprawl.

Page 73, paragraph 3

This paragraph takes great liberty with what the GMA says and the spirit and intent of the law. GMA does not require or intend the isolation of rural residents from public service. Please remember that rural residents are paying taxes and they have the same degree of entitlement to service as their urban neighbors. The continued misstatement of GMA goals and objectives and the continued effort to force a political agenda on citizens in the name of growth management is neither appropriate nor acceptable.

O-092-206

O-092-206 Comment noted.

Page 73 Regional Approach

Page 73, paragraph 1

Examples of strategic investments include siting major public amenities such as libraries and community centers, in centers and compact urban communities. What is the GMA reference for this strategy? Why should other factors such as cost and total accessibility to those served not be primary considerations? What is the fiscal impact of this concept for the jurisdictions that are required to implement the strategy? Have the service providers been approached with this concept?

O-092-207

O-092-207 Comment noted. Siting facilities in centers and compact communities was listed as an example of a strategic facility investment. Also, see VISION 2040 Issue Paper on the Costs of Sprawl.

Page 73, paragraph 2

Conservation is the key to meeting many of our service and facility needs today and will be even more essential in the future. Please provide factual evidence for this statement to cover the full range of services and facilities addressed in this section. The examples of recycling and waste reduction must be supported by specific data covering the effectiveness of the various waste management and recycling programs in place today and the actual cost of those programs to the citizens. Factual data on the actual reuse factors for materials being recycled today and the cost of those programs is essential to understanding the value added of such programs. Looking at the extensive number of documents produced by PSRC and the number of plans and reports required by the MPP, it would appear that a major savings could be realized by either abolishing PSRC or strictly curtailing the role that it plays.

O-092-208

Page 73, Paragraph 3

Under (2) there is a complete list of public services normally provided by cities, counties, or other local service providers. For some unknown and unexplained reason those are now considered to be regional in nature. What is the specific authority for regionalization of services? Who (what authority) will be responsible to rationing services to the various local jurisdictions? Would it be correct to assume that centers and compact communities in major and large cities would have priority for services? Under this scheme, what is the role and authority of legal local service providers?

O-092-209

Page 74, paragraph 1

"Public services and facilities need to be located in a manner that allows jobs and housing to develop where they are desired and planned and to discourage unplanned growth and sprawl." Please provide the specific GMA reference for this statement. It would appear that this strategy will absolutely force both all future housing and employment location to areas where they are "desired and planned". Apparently the concept of freedom of choice exercised by an individual and the constitutionally protected right of enjoyment of use associated with property ownership are not a part of this document. What happens when either the people don't want to live in locations selected by planners or businesses select to place their businesses in a location best suited to their needs?

O-092-210

Page 74 Special Service Districts.

It is of specific note and concern that of the 330 special districts few if any have been invited to the table for the preparation of this document. Those service districts and providers will be key to the success of any growth planning but are normally left out of the planning process as has happened here. Do the drafters know to a certainty that the service providers can provide all of the services required by this master plan? Will that service be available in the most cost efficient manner (lowest practical cost) to the end users? Will the service support the population and employment growth anticipated and how is that known?

O-092-211

Page 74 Districts, paragraph 2

Your very first sentence validates the observations above.

O-092-212

(Comment continues on following page)

O-092-208 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008).

O-092-209 VISION 2040 does not change any authority.

O-092-210 VISION 2040 does not force growth, but creates a regional vision for accommodating growth.

O-092-211 Service providers have participated in the process, and have been made aware of the project through public outreach.

O-092-212 Comment noted.

Page 74 District paragraph 2

"....special service districts remain outside the planning requirements of GMA." Nothing could be further from the truth. If the sentence is taken to mean that those districts cannot be forced by a GMA hammer to comply with city or county planning policies that is correct and for a specific reason. Those jurisdictions have very special requirements placed on them that must keep them as free as possible from the political agendas in documents like Vision 2040. Water service, sewer service and other general utilities are greatly constrained by physical geographic limitations and cost. Levy supported districts such as fire, school, and library districts cease to function well without voter support. Consequently they must remain responsive to the needs and desires of all taxpayers. In the utopia envisioned by 2040 things may be different but we are not anywhere near that yet nor are we headed in that direction.

Page 74 Districts, paragraph 2

"....cities are the preferred provider of urban services" Please provide the specific GMA reference> RCW 36.70A.020(12), a specific GMA goal, RCW 36.70A.030(13) and (20), and RCW 36.70A.070(4) do not appear to agree with or support that statement.

Page 74 Policies

MPP-PS-1

The GMA requirement to "enhance" the environment and public health and safety through provision of public services is not clearly understood. Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy?

MPP-PS-2

This policy appears to address concurrency but in an inverse application. If a policy is required, please use the same terms and language used in GMA. If there is a deviation from GMA please explain what that deviation is and why it is necessary?

MPP-PS-3

This policy is of significant concern. It would appear that the principles of demand management and conservation are not already in place and this round of policies will impose them on service providers. If the methodologies are not already in place, why not? What is the specific requirement to impose this performance methodology on service providers? Exactly what "demand management" and "conservation" methodologies are intended or required under this policy?

MPP-PS-4

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? This policy appears to be in conflict to GMA. Does urban services include water districts and utility districts that may provide such services? Are fire protection and police protection urban services? If this policy is executed will rural residents be relieved of any tax or financing

(Comment continues on following page)

Continuation of O-092-212

O-092-213

O-092-214

O-092-215

O-092-216

O-092-217

O-092-213 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008). See RCW 36.70A.030(20), 36.70A.070, and 36.70A.110.

O-092-214 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008).

O-092-215 This idea was considered but the original language was retained.

O-092-216 Both demand management and conservation already occur. VISION 2040 supports the continuation and enhancement of these efforts.

O-092-217 VISION 2040 will not change the tax structure.

burden for the facilities or services, to include levies, property taxes, and dedicated sales taxes?

MPP-PS-5

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? PS-5 appears to be indirect conflict with PS-4.

MPP-PS-6

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? Please cite the specific authority that would allow any jurisdiction, other than at the state level, to force the consolidation or dissolution of a special district.

Page 75 Specific Services

The specific purpose and point of the first paragraph is not understood. Is it the intent of the PSRC to overturn the proven effective marketing techniques of our retail markets and consumer product systems? Otherwise, the paragraph is little more than the complaints of a consumer who probably contributes just as much to the overall waste system. The paragraph should be deleted.

Page 75 BOX Recycling

Another statement without application or clear meaning. Recycling is as dependent on the use side as the collection side. What is the actual reuse percentage for each category of commonly recycled material? What is the actual cost of the recycling program to the consumer? What specific benefits are derived from the program by the consumer? Would we be smarter to have a finely targeted recycling program that nets actual results?

Page 75 Sewer

"....sanitary sewer service is allowed only in urban areas" Please provide the specific GMA reference. RCW 36.70A.030(20) appears to be in conflict with the statement.

Page 75 Septic

"Septic systems do not allow for urban levels of density or significant urban growth" Please provide the specific factual support for this statement. If the concept of "urban" is not fewer than some elevated homes per acre, such as those associated with transit planning, the statement may be correct. However, existing urban areas have existing homes that successfully employ septic systems. If the intent is to force residents to convert to sewer systems or to force infill that makes septic unviable, what is the GMA reference for such action or the legal authority to force such action?

As a totally separate consideration, In Kitsap County, the aquifer recharge capacity from septic systems is essential to the health of the counties water supply. That development occurred on top of recharge areas and are now classified does not alter the basic

(Comment continues on following page)

45

Continuation of O-092-217

O-092-218

O-092-219

O-092-220

O-092-221

O-092-222

O-092-223

O-092-224

O-092-218 Comment noted. Policy MPP-PS-4 refers to "urban" services (e.g., sewer), and policy MPP-PS-5 refers to other public facilities and utilities (e.g., school serving rural population). Also, see the Issue Paper on Rural Areas.

O-092-219 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008). VISION 2040 does not force the consolidation or dissolution of special districts. This is a revision of an existing policy.

O-092-220 No, that is not the intent. This paragraph has been retained with some modifications.

O-092-221 Comment noted.

O-092-222 See RCW 36.70A.070(5) and the Issue Paper on Rural Areas.

O-092-223 See the Issue Paper on Rural Areas.

O-092-224 Comment noted.

science of our water cycle. Forcing all current urban users to sewer will have serious impact on the water supply of the area.

Continuation of O-092-224

Page 75 Hood Canal

Check your science. You may find that these wonderful assumptions stated as fact are not actually supported by the evidence. This is one of the prime instances where defining and understanding the problem must precede action. We are poised to waste significant public funding in an effort to respond to symptoms we do not fully understand.

O-092-225

O-092-225 Comment noted.

Page 75 Stormwater

The first sentence clearly identifies the law of unintended consequences. Residential areas of less than current urban densities were able to cope adequately with seasonal rain water accumulations. In some cases, residents actually collected rain water for later use. After over 15 years of storm water management there is little evidence that the program is working other than the number of retention ponds and the number of court cases.

O-092-226

O-092-226 Comment noted.

Page 75 Puget Sound

The health of Puget Sound is declining. This statement is continuously offered but there is no substantive evidence offered to support the claim. Exactly what problems have been identified as needing corrective action? The example of Commencement Bay, while interesting, has been in existence for a number of years. No new source of pollution has been identified. The fact that it is a superfund site does not mean extreme measures or actions are required throughout the Sound. When will municipal sewage failure be controlled? When will Victoria sewage dumping be eliminated? The sky is not falling.

O-092-227

O-092-227 Comment noted. Also, see the work of the Puget Sound Partnership for more information.

Page 76 paragraph 1

Hydro power supplies nearly one half of all power needs in the region. The current hydro power system could be significantly expanded using current technologies but finds immediate objection from environmental activists.

O-092-228

O-092-228 Comment noted.

Page 76, paragraph 2

Alternative energy sources (wind, solar, geothermal) provide less than one percent of our current needs. The unit cost of that power, considering the capital investment and lifecycle costs will, without major technological advancement, continue to make those power sources as "boutique" power. The responsible alternate power source for the region is nuclear power. The state of technology today coupled with the historical safety record of nuclear power plants support this as the primary alternative. Once again, it is anticipated that environment activists will oppose any such power development. Finally the use of fossil fuels to generate power is the only clear short term answer. The technology in use today allows power generation facilities to operate efficiently while meeting air and water discharge standards.

O-092-229

O-092-229 Comment noted.

Page 76, paragraph 3

Biking and walking will not, in the foreseeable future, play any significant role in reduction of power use, short of government regulation limiting travel to only biking and walking. To think otherwise and to plan on that basis is foolish. O-092-230

O-092-230 Comment noted.

Page 76, paragraph 4

The reason for this paragraph is not clear. All of the services identified are provided by the private sector. The nature of that service is either dictated by government regulation or responsive to market forces. Either add something in the paragraph to justify its inclusion or delete the paragraph. O-092-231

O-092-231 VISION 2040 narrative has been revised to address this issue.

Page 76 paragraph 5

The reason for this paragraph dealing with Public Safety and Emergency services is not clear. Either add something to justify its inclusion or delete the paragraph. O-092-232

O-092-232 Comment noted.

Page 76, paragraph 6

Is there some problem with a significant portion of general fund dollars being spent on public safety? After all, public safety is the primary responsibility of local government. That the remaining 30 or 40 percent of the general fund does not appear to satisfy the needs of local government should be the actual concern. O-092-233

O-092-233 Comment noted.

Page 76 Paragraph 7

The discussion about water supplies raises the question, "What results from the various WRIA studies are being used in preparation of this document?" The only hard requirement for WRIA planning was the completion of a detailed water quantity for each WRIA. If that information is not being used, it should be. If the WRIA data does not support the statements being offered in this document, change this document to reflect fact. O-092-234

O-092-234 Comment noted.

The global warming and climate change offerings in this section are misplaced and not supported by best available science. It is absolutely essential, before government decides to act to correct a problem, that the problem be fully defined and understood. Global warming, a natural global process, has not been demonstrated to hold specific future threat to our region. The generic term "climate change" has no value as a planning baseline. To be effectively responsive to a problem requires specific definition and an understanding of the cause and effect relationship. O-092-235

O-092-235 Comment noted.

Page 76 BOX

The purpose for the discussion in the box is not clear. Several statements are offered as fact without substantiation or supporting data. The information appears to be redundant to material offered in previous paragraphs of the section. O-092-236

O-092-236 Comment noted. This sidebar has been revised.

Page 77 BOX

Not mentioned in the discussion is the technology that allows the injection of waste water effluent back into aquifer systems as a means of properly recycling water. O-092-237

Page 77 Goals and policies

MPP-PS-7

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? Does this policy include all recycling or just that recycling that is actually resource and cost efficient? Exactly what "conservation" measures are envisioned? O-092-238

MPP-PS-9

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? Is this policy sound for areas that require septic recharge of aquifers? O-092-239

MPP-PS-10

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? In Kitsap County, as long as the septic systems function properly and until such time as effective and safe waste water injection recharge is in place, this is not a good policy. Septic systems are primary sources for aquifer recharge. Kitsap hydrology is not the same as the rest of the region. In Kitsap County, alternate drain fields are required prior to system permitting. Those alternate drain fields are the "fix" for a system experiencing difficulty. Expensive, high maintenance systems are not the answer. O-092-240

MPP–PS-11

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? The purpose of this policy and how it will be implemented is not clear. Does this policy cover all renewable resources? Does this include new hydroelectric power plants? How about nuclear power plants? Would a wood fired power plant satisfy these requirements? Why is this not a market driven effort? Why not promote the most cost effective sustainable means of providing energy? O-092-241

MPP-PS-12

The meaning and intent of this policy is not understood. How conservation is achieved by use of alternative energy providers? What methods of conservation are intended? Exactly what "infrastructure" is subject to the life extension goals? What is the GMA requirement for this policy? What is the fiscal impact of this policy? Please explain how this policy is consistent with both high density population distribution and economic growth. Are we to find only energy neutral business? This policy makes no sense except O-092-242

(Comment continues on following page)

48

O-092-237 Comment noted. This sidebar has been deleted and some of the information is now in the narrative.

O-092-238 Comment noted. Note that the narrative addresses recycling in general. Cost-effectiveness will be a subsequent implementation consideration. This is a revision of a policy adopted in the 1995 VISION 2020.

O-092-239 Comment noted. Policy language is generalized to discuss the issues at a regional scale.

O-092-240 Comment noted.

O-092-241 Comment noted. This policy speaks, generally, to renewable resources.

O-092-242 Comment noted. This policy speaks, generally, to all infrastructure.

as may be the result of technologies developed (not just in the region). How is this policy to be implemented?

Continuation of O-092-242

MPP-PS-13

Telecommunications services are provided by the private sector with oversight at the state and federal level. It is not clear what the intent of this policy is or how the policy will be responsive to technology advances. Exactly what does "friendly to the environment" mean? If providing the required service is in conflict with "friendly to the environment" requirements, which prevails?

O-092-243

O-092-243 Comment noted.

MPP-PS-14

Public safety, on a local level is the primary responsibility of a local jurisdiction. This policy has no meaning in that it covers a responsibility already assigned to local jurisdictions and not an issue of concern for PSRC. Local jurisdiction public safety operators already have effective cooperation and coordination agreements and do not need PSRC assistance in that area.

O-092-244

O-092-244 Comment noted.

MPP-PS-15

It is not clear how locating a service facility near a "center" or transit ensures either the best access or the best service for the end users. These decisions, as in locating businesses for most effective service to customers are best left to the service provider.

O-092-245

O-092-245 Comment noted.

Goal: This goal establishes criteria that exceed federal and state requirements without providing substantive argument for such action. Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy?

O-092-246

O-092-246 This is a goal, not a regulation.

MPP-PS-16

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? Why is this policy necessary in light of the existing WRIA program? Does PSRC intend to take over WRIA for the region? Exactly what "climate change" are we concerned about? What are the potential impacts? How will this policy be implemented? How will the achievement of success of the policy be measured?

O-092-247

O-092-247 Comment noted. Policy is consistent with WRIA actions and is not intended to supplant their more detailed work. See Environment section for more detail.

MPP-PS-17

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? What if a new industry requires water but returns the water to the "system"? How will this policy be implemented and measured?

O-092-248

O-092-248 Comment noted.

MPP-PS-18

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? As written, this policy is subjective and not clear. What is the actual intent of the policy? How will it be implemented?

O-092-249

O-092-249 Comment noted. To improve readability, VISION 2040 does not include citations for each of its provisions. Intent is stated clearly in the policy.

MPP-PS-19

What exactly does this policy mean by "protect the source" and for "environmental balance"? What is the GMA requirement for this policy and what GMA goal does it satisfy? What is the fiscal impact of this policy? How will this policy be executed and by whom? Since our primary water source is precipitation, how far back in the water cycle would this policy go?

O-092-250

O-092-250 "Protect the source" is intended to include all facets that may impact function, as feasible.

Page 78 Siting Facilities

Page 78, paragraph 1

Where did the definition of regional capital facilities come from? How were they authorized? How were they funded? Most of the services and facilities identified are provided by local jurisdictions and have no specific regional component.

O-092-251

O-092-251 Comment noted.

Page 78 paragraph 2

"Less intensive facilities such as libraries and schools are not always located in a manner that supports key growth management principles." What is the specific GMA reference for this statement? Those facilities are most commonly located so as to serve the citizens of the local area. In a county like Kitsap with 75 percent of the population living outside of UGAs, why is it surprising that schools and libraries are also located in rural areas. Keep in mind that many of those facilities predate GMA and PSRC. History and what's right in the world did not do a global reset in 1990.

O-092-252

O-092-252 VISION 2040 addresses this issue, calling for future growth and infrastructure to both be inside the urban area.

Page 78, paragraph 3

"....strategically locating major capital facilities so that they support the regional growth strategy." What is the GMA reference for this requirement and which specific goal does it support? Why should local governments be forced to locate facilities to support .the "regional policy" instead of supporting the citizens of the local area who are paying the bills? It is reasonably clear that the thrust of Vision 2040 is to create something that does not and will not exist naturally, regardless of cost or impact to the citizens who live here.

O-092-253

O-092-253 Comment noted. VISION 2040 does not force local decisions.

Page 78, paragraph 4

"....equity to ensure that the benefits of regional capital facilities are shared by communities throughout the area" Exactly what does this mean and what "regional facilities" are included? How do the citizens of the entire region enjoy the benefits of all regional capital facilities? How is this executed and at what cost?

O-092-254

O-092-254 See list of facilities at the front of this section. Also, the facilities are intended to be available for all citizens for their benefit if they so choose.

50

Page 78, paragraph 5

Yes, school districts are separate local jurisdictions and are not subject to the policies herein. Yes school districts did locate schools according to population densities and the availability of space to support the school and activities demanded by citizens. Unfortunately, with the policies of this document and other local policies implemented under GMA the space in "urban" areas is not available and even if it were the cost of constructing an appropriate school in an urban area would be prohibitive.

O-092-255

O-092-255 Comment noted.

Page 78, paragraph 7

Apparently, PSRC is prepared to restructure any part of any local jurisdiction, starting with school districts, to achieve the political objectives of the policies in this vision. Why does PSRC believe that such action is required and if it is required why has it not already been accomplished at the local level? Is this another area that PSRC will exercise funding extortion to gain its objectives?

O-092-256

O-092-256 See VISION 2040 Issue Papers on Sprawl and on Rural Areas.

Page 78, paragraph 8

OK. Now PSRC have gone just a bit too far. Have you heard about the concept of government not meddling in religions? Are you aware of the constitutional restrictions regarding government and religion? Controlling the location of places of worship certainly comes close to the authority to establish a religion. PSRC does not have the authority of our creator and should not attempt to exercise that authority.

O-092-257

O-092-257 Comment noted.

Page 79 Policies

MPP-PS-20 There is no policy numbered 20.

O-092-258

O-092-258 VISION 2040 has been revised to address this issue.

MPP-PS-21

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? In many instances, this is the responsibility of local jurisdictions that are not party to the formulation of these policies and not subject to them. Exactly how does PSRC contemplate bringing those jurisdictions in line with the policies?

O-092-259

O-092-259 Comment noted. Implementation of the VISION will occur, in part, through local planning and action.

MPP-PS-22
Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? In Kitsap County, with over 75 percent of the population living in rural areas, this policy makes no sense. Further, the rural residents are paying the taxes that support these facilities and will not tolerate being denied access or equal use of the facilities.

O-092-260

O-092-260 Comment noted.

MPP-PS-23

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. Of note, the consideration of cost effectiveness is not

O-092-261

O-092-261 Comment noted.

(Comment continues on following page)

mentioned. It is also of interest that "regional" facilities are not defined. Exactly what facilities are considered "regional" and how did they gain that designation? What is the fiscal impact of this policy?

Continuation of O-092-261

MPP-PS-24

Again, the policy requires local jurisdictions to take actions contrary to the best interest of citizens. What is the GMA requirement for this policy? What GMA goal is directly supported by the policy? In Kitsap County, with 75 percent of the population residing in rural areas, would it not be more appropriate to locate the facilities in rural rather than urban areas? This policy is inappropriate and should be deleted.

O-092-262

O-092-262 Comment noted. This is a revision to an existing policy adopted in the 1995 VISION 2020.

Page 79 Fiscal Opportunities

While the concerns expressed in this section are certainly those commonly expressed by government, they are without actual basis. A government jurisdiction that efficiently provides the essential services to citizens as required by citizens in creation of that government will be supported by the citizens. It is only when government oversteps the authority delegated to it and moves to create new responsibilities does the matter of funding shortage come to the fore.

O-092-263

O-092-263 Comment noted.

Page 79 Policies

MPP-PS-25

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? The policy is not clear as to intent or implementation. Does "new and existing sources" mean public funding (my wallet)? Is this a regional level issue? What taxes and fees are paid to the "region"?

O-092-264

O-092-264 Comment noted. VISION 2040 has been revised by moving the fiscal policies to the first section and adding narrative to clarify the topic. No taxes or fees (except membership dues) are paid to the region. This is a revision to an existing policy adopted in the 1995 VISION 2020.

MPP-PS-26

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? This policy seems to indicate that virtually any and all methods will be used to prevent development that is not in strict compliance with the policies herein. Where does the "region" derive authority to suggest much less implement such a policy? Please cite the constitutional authority for regional control over regulatory, pricing, taxing and expenditure practices.

O-092-265

O-092-265 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-092-008). Development decisions are made at the local level. This is a revision to an existing policy adopted in the 1995 VISION 2020.

Page 79 Overview

It would appear that the thrust of the actions are to exceed the requirements of GMA and to usurp the authorities vested in local special districts to place them under the PSRC policy umbrella. In addition it would appear that PSRC believes that it must play some role in water policy planning even though the state already has such a program in WRIA. Finally it would appear that PSRC is going to play some significant role in identifying new and different ways to develop revenue sources to help pay for all the benefits to be derived from the policies. Perhaps if PSRC did not exist, all of the funding being dedicated toward this Vision effort and all the supporting efforts could be diverted to actual value added benefit for the tax payers.

O-092-266

O-092-266 Comment noted.

Page 79 Monitoring

Once again we have a paragraph that says nothing more than "see Appendix 2". Of course when Appendix 2 is reviewed, there is not much in the way of actual monitoring metrics, data collection, analysis, reporting or alternate actions.

O-092-267

O-092-267 VISION 2040 narrative has been revised to include monitoring measures in the main document.

Page 81 Implementation

This section appears to do little more than address non-specific or assumed successes of PSRC policies and relate them to GMA requirements. This is somewhat concerning since the majority of the strategies and policies in Vision 2040 have little to do with actual GMA goals, objectives, or requirements.

O-092-268

O-092-268 Comment noted.

The statement that PSRC will conduct a number of efforts to implement Vision 2040 certainly gives the impression that PSRC considers itself an "action" agency with both authority and responsibility to carry out actions within the region. It would be interesting to understand exactly how that will work. A significant number (if not all) of the elected officials serving as PSRC board members do not have inherent legislative power by virtue of their office nor do they have the authority to obligate their respective legislative bodies to any course of action. Finally all jurisdictions that would be subject to the policies as PSRC would have it are not represented in PSRC or signatories to the PSRC local agreements. How PSRC would hope to execute or impose action requirements on non-participants is certainly a question to be answered. The faulted logic in the statement is indicative of the flawed approach throughout this document. PSRC does not have legislative authority of any kind. PSRC does not have power to direct or require any certain action from any jurisdiction. PSRC cannot implement anything.

O-092-269

O-092-269 Comment noted.

The additional discussions on the next two pages (82 and 83) which detail how PSRC is going to do things are the product of a fatally flawed process. PSRC needs to completely reassess the role that it has been assigned and its relationship with all local and special district jurisdictions. PSRC needs to get off of the soap box and back into the box in which it must operate. PSRC, except through funding extortion and coercion has no authority or power to implement anything or to force jurisdiction to implement anything.

O-092-270

O-092-270 Comment noted.

Final Comment:

Having completed the review of Vision 2040 and having compared the contents of the document to RCW 36.70A (GMA) and RCW 70.94 (Clean Air Act), it becomes apparent that little or no attempt was made to actually be in compliance with the spirit, intent, or requirements of those laws. Further, not only did the drafters of Vision 2040 take great latitude in the interpretation and application of the underlying laws, they also appear to have sought out the most stringent or extreme manner in which to apply their "understanding" of the laws. Citizens deserve better for their tax dollars. Governments were not created to exercise control over the citizens they serve but were created to defend and protect the individual rights of all citizens. The drafters of this document and those who voted to approve it do not appear to comprehend their basic responsibility to the

O-092-271

O-092-271 Do not concur.

(Comment continues on following page)

citizens of their jurisdictions. If it were one or two policies that exceeded the scope of common sense and appropriateness, perhaps some appreciation for "misunderstanding" could be invoked. However, that virtually all goals and policies and all of the supporting strategy statements make such wide departure from underlying law cannot be written off to misunderstanding.

Continuation of O-092-271

If the Vision 2040 document were not enough to cause concern, the DEIS further extends that concern. The DEIS makes the basic assumption that the policies and strategies of Vision 2020 were effective and serve as the building blocks for Vision 2040. There is no factual data provided to support that claim. In that 2020 had no specific performance metrics, no formal data collection and analysis process, no formal high level review and assessment process, and no outside review of results to determine success, there is no viable manner to actually determine success. Similar to many other "policy" documents, Vision 2020 assumes success simply because the document was adopted by some authority and time has passed. That is not acceptable as a methodology for establishing a baseline for any policy development and certainly will not stand as a basis for the development of Vision 2040.

O-092-272

O-092-272 The initial Public Scoping period determined that VISION 2040 should build upon the existing VISION 2020, think long range, be bold — and provide leadership, broaden the vision to cover other important regional issues, and to be specific when possible — for example, by adding measurable objectives to policies.

PSRC offers much assurance that this Vision 2040 has significant "pubic input" and reflects the desire of the people. That is not the case. No individual residing in a rural area would willingly accept any of the policies directed toward rural areas. Knowledgeable people of Kitsap County would reject nearly every policy dealing with growth directed toward centers, transportation targeting SOV/POV, water issues, and the economic development policies of the vision. They just don't fit. Why any knowledgeable person would accept policies that while portending to "preserve" the character of their communities would actually destroy that character and the community itself is not understood. This document does not reflect the needs and desires of the majority of the individuals living in the respective counties and cities.

O-092-273

O-092-273 Do not concur.

Respectfully submitted,

Karl Duff

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cc: Kitsap County Commissioner Steve Bauer, District 1
Kitsap County Commissioner Jan Angel, District 2
Kitsap County Commissioner, Josh Brown, District 3
Nancy Buonanno Grennan, Kitsap County Administrator

O-098
received 8/1/07

Robin McClelland

From: vivian [viviankapo@wavecable.com]
Posted At: Wednesday, September 05, 2007 3:19 PM
Conversation: PSRC Vision 2040 Testimony - Sec. 1 KAPO
Posted To: Vision 2040
Subject: PSRC Vision 2040 Testimony - Sec. 1 KAPO

Re: telephone conversation with Sue Singer/Karl Duff 9/5/07. The following testimony was hand delivered to Sue Singer at the Seattle conference August 1, 2007. SMs Singer indicated to Karl that she has misplaced the testimony and she suggested we re-enter it via Email. Thus, as follows. Ms. Singer also promised that PSRC would enter this testimony into the record when it was presented to her on August 1st. Please confirm. A hard copy will follow in the mail. Vivian Henderson, Executive Director Kitsap Alliance of Property Owners.

Draft Review Comments (Partial)

Puget Sound Regional Council (PSRC) Draft VISION 2040 and Draft Supplemental Environmental Impact Statement (DEIS)

August 1, 2007

The following comments are the result of a detailed review of the subject document. Comments are provided, first as general comments concerning the draft in total and then as specific paragraphs or items in the draft.

General Comments

1. The draft is uncommon for most documents of its nature in that it is well composed. In general, the language is simple and the thoughts offered are clear. While it is lengthy and redundant in some cases, that is understood as many individuals will not take time to read the entire document but will concentrate on only those areas of particular interest to them.

2. The draft portends to be a product of significant public input but the nature of that input and the most likely results of that input are not evident. Noting a sample of perhaps 4500 individual inputs is not significant in a metropolitan area that covers four of the most populous counties of the state, and which includes legislative, regulatory, and taxing jurisdictions numbering in the hundreds and a vide diversity of cities and population centers. While it is clear that those citizens and groups concerned with environmental issues have played a major role in preparation of the draft, there is no indication that those who actually own the property being regulated have had any involvement. In view of the ongoing litigation against King and Kitsap County concerning land use regulatory issues, providing a greater role for representatives of those interests would seem appropriate.

3. If memory and the public record serve correctly, PSRC has limited authority associated with determination of assignment of federal and perhaps state transportation grant funds. Even that authority is supposed to be one of collaborative effort of the federal transportation district members. To expand that role and to assume authority over land use regulation, in general, is a

(Comment continues on following page)
9/6/2007

O-098-001
O-098-002
O-098-003

O-098-001 Thank you.

O-098-002 See response to O-092-005.

O-098-003 Comment noted. Note that Kitsap County has been a member of PSRC, and its predecessor agencies, since the 1950s. This provision is within the authority of the Regional Council's mandates under state law (such as the Growth Management Act {see "The State of Washington's Growth Management Act and Related Laws - 2007 RCW Update"}, the Clean Air Washington Act, the Interlocal Cooperation Act), federal law (such as the Safe, Accountable, Flexible, Efficient, Transportation Equity Act -- a Legacy for Users, the Presidential Executive Order 12898 on Environmental Justice, the Clean Air Act), its Interlocal Agreement with its members, as well as the requirements related to the designations as the Regional Transportation Planning Organization, Metropolitan Planning Organization, and Economic Development District for the central Puget Sound region. See the Interlocal Cooperation Act, RCW 39.34.

stretch not supported by the State Constitution or Growth Management Act (GMA). The creation of a "regional" legislative body is not addressed in our constitution except in the most liberal interpretation of the provisions for "city/county" government and that action would require a ballot approval by the citizens involved. The GMA, while noting a need for cooperation between adjacent jurisdictions, makes no mention of creation of a "super council" to guide the actions of member jurisdictions. RCW 36.70A.210 (7) does provide for multi-county planning but establishes specific guidelines. Kitsap County does not have a population of 450,000 or more and does not share "contiguous urban areas" with any of the other three participating Counties. The inclusion of Kitsap County in the "regional" planning policies is not supported by law and therefore cannot be legally binding on the citizens of Kitsap County. Nothing in the Constitution, regarding the functioning of county governments, authorizes the delegation of legislative authority from the county to a non-elected body. Kitsap as a non-charter county is constrained by the specific provisions of the Constitution. Further, the PSRC Board is not comprised of only legislative members of the participating jurisdictions and cannot exercise legislative jurisdiction for them. The extreme interpretation of the GMA that would permit the creation of the PSRC as a legislative body or a body exercising authority over any duly elected jurisdictional body is simply not acceptable.

Continuation of O-098-003

O-098-004

O-098-004 Comment noted. Note that Kitsap County has been a member of PSRC, and its predecessor agencies, since the 1950s.

4. It is clear by reading the various sections and paragraph of the draft that all 13 GMA goals (14 when shorelines are included) have not been equally considered without priority. That is a specific requirement of GMA. There is no analysis of fiscal impact included. There is no indication that property rights have been considered or provided for even though many of the policies would impose significant restrictions on the enjoyable use or control of private property. On that basis alone, the draft fails the test of compliance with GMA.

O-098-005

O-098-005 See response to O-092-008.

5. It is clear that the authors of the draft MPP consider environmental issues the over arching and controlling concerns of the strategy and the policies. However, there is no statement of rationale as required by GMA. Further, close reading of individual paragraphs and policies make it clear that there is no definition of any specific problem to be resolved or reason to impose restrictive policies. The sections dealing with environmental protection are rife with generalities concerning why protections may be required and even greater generalities about what the objectives of the policies are. It is clear that inclusion of the environmental policies, as primary concerns, is political in nature and has no real basis in correcting existing problems or preventing any potential, quantifiable problem.

O-098-006

O-098-006 Comment noted.

6. Throughout the draft the issue of climate change is raised without any attempt to either define or quantify the nature of the problem. The term "climate change" is being used as the fear multiplier of the day to force the uninformed to actions that have no basis or no foreseeable results. Let's all agree that climate changes. Let's further agree that climate is global in nature with local impacts. Perhaps we can also agree that the science (not the number of "scientists") on the reasons for "global warming", a normal evolutionary function, is not complete and not agreed upon universally. Perhaps we might accept that science has made more positive direct links between the activities of our sun on climate change than has been made for any natural occurrence on earth. Perhaps we can agree that the most significant contributor to "greenhouse" gases is water vapor which is conveniently overlooked in all discussions and calculations concerning the effect of those gases. Perhaps we can agree that a primary contributor of Carbon Dioxide into the atmosphere is breathing humans and mammals. Perhaps we can agree that using fear and diverting our attention and energies from real research and development is not in our best interest but is little more than an attempt to gain or consolidate political power.

O-098-007

O-098-007 Comment noted.

7. Throughout the draft, issue is taken with the activities of prior generations of humans and the unnecessary impact on the "environment". Unfortunately, little credit or understanding is given to those generations for enabling us to be here today to be debating or discussing the issues before us. Two hundred years ago the region was sparsely inhabited by small bands of nomadic tribes who used the local environment for their purposes. These were basic survival uses by tribes who had no written language, offered no inventive skills, and who survived by acting as inefficient hunter gathers. They comprised no "great civilization" as might be envisioned by the Maya or Inca. When the first western culture settlers arrived they came to exploit the natural riches of the area. Without them, the settlements they established and the economies they developed, would not be here today. Yes, their communities were compact and "pedestrian friendly"; that was the only available mode of transportation. Remember that Lewis and Clark traveled from St. Louis to the Pacific Coast by canoe and by foot, not because they wanted to but because there was no other way. To equate or cite "pedestrian friendly" communities as a historically desirable condition is inappropriate. Our region grew because the natural resources of the area supported that growth. To now find fault with that growth as irresponsible exploitation is to indicate that we should not be here. The most important economic factors of our region today are built on the use of resources over the past 150 years. The economic engines of the ports of Seattle, Tacoma, Everett, and Bremerton exist because prior generation reconfigured shore line to take advantage of the opportunities. Vast land areas have been transformed from woodland to industrial and commercial uses or to housing. Those uses give us the opportunity to raise above basic survival levels and to engage in these esoteric discussions about how to save our world. We wonder if our predecessor generations, or those trying to eek out basic survival existence in third world nations, realize the low esteem in which PSRC holds them for efforts, successes, and dreams. O-098-008

O-098-008 Comment noted. VISION 2040 is not intended to imply what is noted in the comment.

8. Throughout the draft are numerous policies that would restrict the use of rural lands or dictate certain uses of land in other categories. Not mentioned in those discussions or policy statements is that the land in question is private property and the impact of the actions has direct effect on individual citizens and not some amorphous group identified as "public good". Private property is the basis for all wealth generated in our open market economic system. Private property represents the labor and investment of private citizens and, in most cases, is the central wealth of any private estate. The continued existence and protection of private property is the keystone of the continued political and economic health of our country. Our state Constitution and the GMA both stress the necessity of protecting the rights of ownership of private property. Vision 2040 and the DEIS openly attacks the protected rights of "enjoyable use", "control of access" and "disposition". The policies in the draft tend to treat private property ownership as a privilege rather than a protected right. The policies take action in the name of "community good" when no such entity exists. If the policy drafters need an understanding of the concept of "group rights" they need look no further than the Constitution. The opening words "We the people of the State of Washington, grateful to the Supreme Ruler of the Universe for all our liberties, do ordain this constitution" make it clear that the constitution should be the document to define group rights. "Group" rights do not exist. Please note that the preamble also identifies the Supreme Ruler as the source of our individual rights, not the state or PSRC. O-098-009

O-098-009 VISION 2040 has been revised to address this issue to reference the GMA goal on property rights.

9. Throughout the draft various policies direct jurisdictions to "restore" environments. First and foremost, GMA does not mention or require restoration of environment or habitat. GMA requires protection of those critical areas so designated. If the intent is to expand the guidance for restoration of watersheds, that guidance would then apply to the entire land mass of the area and all actions to "restore" would apply equally. In order to "restore" anything, there must be a baseline for that restoration. Such a baseline has not been established. If the baseline is to be a point in time, appropriate documented scientific evidence as to conditions at that time would be required. To date no such evidence has been brought forward. In this regard, it is best to be careful what we wish for. We already have the tribes insisting on conditions that most probably O-098-010

(Comment continues on following page)

O-098-010 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003). VISION 2040 has been revised to define what is meant be the term "restore."

never existed and which are not documented.

After comments

The following comments reflect the general thoughts of the reviewers after detailed review of the first 51 pages of the document and review of all policies in the document.

1. The document would better serve as a campaign platform or series of campaign speeches for an individual seeking office. The nature of the prose, the number of unsubstantiated assertions or statements offered as fact and the general subjective nature of argument supporting policies is not worthy of a serious document with such a major impact on the citizens of the region.

2. The number of times the drafters misquoted GMA or attributed guidance to GMA that does not exist is of specific concern. Minor differences in the goals and requirements of GMA will always occur but complete disregard for the spirit and intent of the Act is not understood. Two specific cases are the absolutely clear intent to force virtually all population growth into existing UGA and the creation of permanent rural areas with severe limitations on development. Neither of those are GMA attributes. It does appear that the drafters, knowing that they were exceeding GMA spirit and intent simply continued with the philosophy "if you don't like it appeal it". Unfortunately that approach is also contrary to the sworn duty of every elected official in the state. Should these policies stand as presented, it appears that there is a solid basis for successful appeal.

Specific Comments

Page 1 – Vision Statement

"advances the ideals of our people" – exactly what are these ideals, where are they specifically defined, and how were they determined?

"our planet" – please provide the GMA reference that extends county wide planning policies to a planetary level. How are these policies coordinated with the other jurisdictions on the planet?

" we must protect the environment" – this statement, lacking equal identification of any other GMA goal, establishes a priority of goals with environment as primary. GMA requires that any such prioritization of goals be justified by specific and substantial argument. That information has not been provided and no basis for placing environment above all other goals has been provided.

"achieves social equity" – this phrase has no meaning. "Social equity" is not defined, not a consideration or goal of the GMA and appears to be little more than an effort to implement overt political social engineering into land use regulation. Because the "land" under discussion is in fact private property and because both the state constitution and GMA provide specific protections for private property, any effort to include social engineering into these policies would impact constitutionally protected rights of ownership, This would not only be inappropriate but not supported by law.

Page 2 paragraph 3

"serves the people of central Puget Sound" – please explain this claim. The majority of the people of Puget Sound do not even know of the existence of PSRC, they certainly did not elect any of the members to serve in this collaborative effort, and they are not aware that significant tax dollars are being directed toward this effort. Since the counties and cities are separate jurisdictions with independent authority and responsibility to serve their constituents, how PSRC is granted more

(Comment continues on following page)

Continuation of O-098-010

O-098-011

O-098-012

O-098-013

O-098-014

O-098-015

O-098-016

O-098-017

O-098-011 Do not concur.

O-098-012 Comment noted.

O-098-013 The basis for the ideals expressed in VISION 2040 comes from existing adopted plans and public policy, research, and public comment received during the scoping process (including that of member jurisdictions), the DEIS, and draft plan/ SDEIS phases of the update.

O-098-014 This is a general statement that recognizes the planet that we live on as important.

O-098-015 Comment noted.

O-098-016 Comment noted. "Social equity" is a reference to the federal government term "environmental justice." Executive Order 12898 directs agencies and programs that receive funds from federal agencies to address the effects of their programs, policies, and activities on minority and low-income populations.

O-098-017 Comment noted. Note that Kitsap County has been a member of PSRC, and its predecessor agencies, since the 1950s. Also, the provisions in VISION 2040 are within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (see response to O-098-003). Also,see Regional Transportation Planning Organization (RTPO) legislation, RCW 47.80.

authority than those individual jurisdictions is not clear. That the staff and participating representatives "feel" they are doing good things does not validate the cost or potential for invasive oversight. PSRC, operating as a regional legislative body, operates to the detriment of the citizens since such a body is not authorized by law.

"It is the Regional Transportation Planning Authority under GMA" – We can find no reference in GMA that specifically names PSRC to that role or assigns any authority to PSRC for regional transportation planning. Even is that were so, any "transportation" responsibility could not be translated into authority to exercise oversight in land use matters.

Last sentence concerning "jurisdictions" served" – there is no mention of the numerous lesser taxing jurisdictions that would be directly impacted by the land use policies of this document. Why are jurisdictions not included and, if they are not participants, are they subject to the offerings of PSRC? Just how does that work?

Continuation of O-098-017

Page 3 Introduction

"Before it was a major metropolitan area, it was a landscape of seemingly limitless mountains, forests, and prairies surrounding the Puget Sound" – you must have a poet laureate on staff. Very poetic, however without meaning or substantiation. Please provide the specific date reference to this claim so that the reader may properly appreciate the changes that are discussed in the remainder of the section.

O-098-018

O-098-018 This is a general statement about pre-settlement conditions and is clear as stated. The Introduction is meant to provide a context for VISION 2040.

"inviting and life sustaining waters" – this needs specific definition. Salt water or fresh water? What life is being sustained? Does the phrase include all water conditions including flood and or storm generated waves?

O-098-019

O-098-019 Comment noted.

"renowned quality of life" (QOL) – this phrase needs specific definition with respect to its application in this and other land use planning documents. QOL has different meanings to different groups at different times. Consider that QOL in a medical sense is far different from QOL in a recreational sense. The use of non-defined "glittering generalities" may serve the purpose of the drafters but it does not serve either the implementers or the citizens who must understand and come to grips with the policies contained in this document.

O-098-020

O-098-020 Comment noted.

"assure what is most valued about this place remains timeless" – another nice effort in prose but having no specific measurable quality or quantity. If this is important make it very specific.

O-098-021

O-098-021 Comment noted.

Page 3 Question

"While enhancing our environment and our overall quality of life" – GMA establishes protection of environment as a goal, not enhancement. Quality of life is not defined and therefore not measurable.

O-098-022

O-098-022 Comment noted.

Page 3 paragraph 3

"the environmental framework" – once again a clear indication that environment is the top priority without the required justification.

O-098-023

O-098-023 Comment noted.

Page 3 paragraph 4
"addresses the necessity of environmental stewardship" – see the comment above. In addition, the term environmental stewardship is not defined. Private property owners would argue that they, as property owners with the most direct vested interest in the property, are the best stewards of that property. However, if the actual objective is to deprive property owners' enjoyable use or control of their property, it would follow that they would not be good stewards.

O-098-024

O-098-024 Comment noted. "Environmental stewardship" is defined in the Environment policy section and in the Glossary.

Page 3 paragraph 5

"and recommits the region to directing future development into the urban growth area" – GMA specifically uses the word "encourage" when identifying growth into UGA. In addition GMA provides sound rationale for that encouragement. This document has taken general guidance and turned it into constraining direction that far exceeds the intent of GMA

Page 4 paragraph 1 (Paragraph is a continuation from previous page 3)

"Focusing growth in cities and urban areas helps protect natural resources and sensitive environmental areas, encourages a strong economy, improves regional job/housing balance, and minimizes rural residential growth" – The entire statement has little or no real application to Kitsap County. The major employers of the area are spread throughout the county, primarily in rural areas. These employers will not relocate. The projected major "industrial growth area" is located in rural south Kitsap. The existing regional retail and service areas, while located in urban areas are owned and operated by individuals residing in rural areas. The overwhelming majority of Kitsap residents prefer a rural single family residence to an urban location. The current development of Kitsap County would include development of areas that would by current standards be classed as "sensitive environmental areas" but were developed in those areas to maximize the benefit of natural resources to the economy.

Page 4 paragraph 1

"multi-county planning policies adopted under the GMA" – please provide the specific reference that directs or authorizes the PSRC or the creation of the planning policies that include the four member counties.

"address region issues" – elected officials from Kitsap County do not have delegated authority to address themselves to regional issues beyond the borders of Kitsap County with respect to land use regulation.

"provide guidance and direction" – that is a statement of authority not permissible under law. Our county elected officials do not have authority to delegate any of their assigned authority to any other jurisdiction. They cannot bind themselves or the people of the county to take "guidance and direction" for county matters from PSRC. The elected officials of King, Pierce, and Snohomish Counties have no authority for land use planning in Kitsap County.

"Multi-county policies lay the foundation for securing the necessary funding" – this concept needs significant explanation. As will become evident further in the Vision document, what the phrase really means is that if the individual jurisdictions do not fall in compliance with these policies, funding from federal and state sources will be cut off.

Page 4 Paragraph 2

"The final part discusses implementation" – this reinforces the concept of Vision 2040 as being directive in nature.

Page 4 paragraph 3

"help guide the region" – noted previously that guidance, when directly linked to funding availability, is not guidance.

Page 4 paragraph 4

"that takes on regional issues that cannot be comprehensively addressed within a single

(Comment continues on following page)

O-098-025
O-098-026
O-098-027
O-098-028
O-098-029
O-098-030
O-098-031
O-098-032
O-098-033

O-098-025 Do not concur.

O-098-026 Comment noted. However, the most recent estimates (2003) show that 82% of Kitsap County's employment is within the UGA. Furthermore, 20% of the county's workforce is employed in King, Pierce, or Snohomish counties. Finally, the South Kitsap Industrial Area is inside the UGA.

O-098-027 VISION 2040 has been revised to address this issue.

O-098-028 VISION 2040 recognizes the land use authority of local jurisdictions. See 36.70A.100 on regional coordination. See also 36.70A.210 and 47.80.

O-098-029 See response to O-098-028.

O-098-030 See the expanded General policies section and Part IV: Implementation for more information and explanation.

O-098-031 Comment noted.

O-098-032 Comment noted.

O-098-033 Do not concur.

jurisdiction" – that may be the case in a certain number of select issue. Decisions regarding implementation of the GMA are generally reserved to counties and cities while this document has become so overarching as to negate the will of those jurisdictions. What is so regionally comprehensive about a county deciding the mix of urban/ rural development in the county or the best methodology to locate economic development in the county?

Continuation of O-098-033

Page 4 paragraph 5

This entire paragraph is without meaning but does reflect the concept that an emotional rather than a logical approach was used to develop these policies. The final inclusion of "our planet" certainly indicates that PSRC has its eye on a higher target well beyond the considerations or requirements of GMA. It would be more appropriate, if PSRC is really concerned about planet wide matters than addressing the local issues, the group should apply for special status under the United Nations and leave the rest of us to get on with our lives.

O-098-034

O-098-034 Comment noted.

Page 5 Framework

The way land is developed affects air and water quality" – if this is a statement of fact, solid evidence as to both the nature and degree of impact should be provided. If it is assumption, no matter how well founded, it must be so identified. Because the bulk of the material that follows this "Framework" paragraph is based on these words they must be clearly validated.

O-098-035

O-098-035 Comment noted. See the Issue Paper on Environmental Planning.

Page 5 paragraph 1

"It has become clear that the health of our natural environment is closely linked to the regions economy and quality of life." See the comments above. The statement sounds nice and may have some truth in it, when viewed from a certain perspective, but to serve as the basis for policy it must be clear and unambiguous. This statement does not come close to providing factual information.

O-098-036

O-098-036 See VISION 2040 Issue Paper on Health for more information.

Page 5 paragraph 1

"GMA…. Have placed the region on a solid basis to restoring and protecting the environment" – GMA does not require or even address restoration of environment or habitat. Please refer to the paragraph in the general section of these comments concerning restoration.

O-098-037

O-098-037 Comment noted.

Page 5 Paragraph 1

"quality of life" – provide specific definition in measurable qualities and quantities.

O-098-038

O-098-038 Do not concur that this is necessary.

Page 5 paragraph 2

"cleaning up and restoring additional waterways" - not a GMA goal or requirement

O-098-039

O-098-039 Comment noted.

Page 5 paragraph 3

"magnificent natural environment" – define in measurable terms

"past practices have affected the environment" – this is taken as a negative connotation. Please explain how we would now enjoy the wealth and stability to concern ourselves with all these wonderful environmental issues if we did not affect the environment in the past. There is no specific definition of a problem with the environment that these policies will address. Limiting growth is not an environmental policy it is a ***political policy.***

O-098-040

O-098-040 In a public opinion survey conducted during the VISION 2040 scoping process, people were asked what they liked best about the region. The majority responded that it was the natural environment/climate. The concept of a "magnificent natural environment" does not need to be defined in measurable terms to be understood in VISION 2040.

O-098-041

O-098-041 Comment noted. VISION 2040 does not propose limiting growth.

Page 5 paragraph 3

"working together to restore" – not a valid GMA goal or requirement.

Page 5 paragraph 4

"call to action" – makes Vision directive

Page 5 paragraph 4

"restore the environment" - not a valid GMA goal or requirement.

Page 5 paragraph 4

"the region can make substantial progress toward creating a truly sustainable environment" – the Vision offers no evidence that such a condition does not already exist. The term "sustainable environment" has no definition offered and no metrics to determine achievement of such an objective.

Page 5 paragraph 4

Protect and enhance the environment" - not a valid GMA goal or requirement.
Page 6 paragraph 1

"it is internationally known as a clean, healthy, safe, and diverse place with a vibrant economy and a temperate climate" – this statement is directly opposite the conditions being offered as the basis for the policies. The existing conditions are the result of over 150 years of continuous development and the impact of market forces on both economy and environment. This statement makes it reasonably clear that citizens will achieve what is really best for the region without the help or interference of government.

Page 6 paragraph 3

Traditional industries, such as ….. "timber harvesting" – please identify a significant timber industry in the 'region' that equates to the timber industry of the 1970's. Perhaps you could also explain why, with all of the available forest areas in the region, we must import our lumber form Canada.

Page 6 paragraph 3

"as well as new industries based on clean technologies" – please identify the major new industries in this category that have located in the region since 1990.

Page 7 Natural Ecosystems Conditions

1. There is no explanation why this graphic exists. It is not referred to in the written matter.

2. This graphic is not applicable to Kitsap County. For starters, Kitsap does not obtain water from snow pack and Kitsap does not have river systems. In fact, except for a small land connection to Mason County, Kitsap is essentially an island community.

3. If this graphic represents the environmental basis for planning polices, the policies will not apply

O-098-042 Comment noted.

O-098-043 Comment noted.

O-098-044 Comment noted.

O-098-045 VISION 2040 provides a definition of sustainability.

O-098-046 Comment noted.

O-098-047 Do not concur.

O-098-048 This idea was considered in the VISION 2040 process and the language was kept as written.

O-098-049 The statement is based on statements by the Washington Clean Technology Alliance (wacleantech.org).

O-098-050 Comment noted. The graphic is meant to be illustrative and not place-specific.

to Kitsap.

Page 8 Paragraph 1

"Over time, the environment has been harmed, in some ways irreversibly" – please provide factual data to support this statement and link it to growth that was not instrumental to our "quality of life" today. O-098-051

Page 8 paragraph 2

"pattern of low density development has had unintended environmental consequences" – this statement vilifies rural development even though that was the natural course of events for growth of the area. It would be worthwhile for the authors of this document to complete a bit more objective review of the area history rather than simply assume everything done in the past was bad. To ignore history is to have to repeat the same errors of the past. Perhaps a good review of the "unintended consequences" of "high density" growth might be in order. O-098-052

Page 8 paragraph 3

"increased greenhouse gas emissions are one major result of human activity. These emissions have raised the average global surface temperature" – this is a major step from GMA. You have provided no clearly supported scientific evidence for any part of the statement. The fact that "global warming" with the side possibility of "abrupt climate change" is the cause d'jour does not give license to commence regulation of every citizen to achieve some ill defined political goal. This is the first best example of several in the vision document of the drafters using assumption as fact. The actual scientific evidence on global warming reveals that it is natural across the life cycle of the planet, is more closely aligned with solar activity than any other cause, and that increases in CO2 (to the extent scientifically determinable) normally lag warming of the earth. It is not appropriate for this document or any government level planning policy to address unsubstantiated global issues with unproven answers. O-098-053

Page 8 paragraph 4

"growth and development have caused a wide range of environmental impacts" – please identify any human activity that does not have an environmental impact. Then do the same for any wildlife activity. We all interact. Interaction is not automatically negative because it is human induced. If that is the understanding of PSRC, we hope you would consider the actual meaning of such a finding and perhaps demonstrate the leadership of being first to take appropriate corrective action. The rest of us will just have to struggle on. O-098-054

Page 9 Graphic Human Impacts to Ecosystem Conditions

1. Similar to the graphic on page 7, this graphic has no identified reason to be here. There is no reference to the graph in the written matter.

2. This one-size-fits-all and very simplistic explanation does not add to better understanding of actual conditions in any area. Glittering generalities of "problems" do not lead to actual solutions but do result in divergence of assets from real needs and delay corrective actions that are needed.

3. "Loss of forest lands"- this description simplistically identifies timber harvest with erosion and O-098-055

(Comment continues on following page)

O-098-051 See, for example, the Puget Sound Clean Air Agency website (pscleanair.org). Also, see VISION 2040 Environmental Issue Paper.

O-098-052 Do not concur.

O-098-053 Do not concur. See the Governor's Climate Change Challenge 2007 and RCW 80.80.020.

O-098-054 The purpose of the statement is to recognize impacts so they can be avoided or, when unavoidable, mitigated to the extent possible.

O-098-055 Comment noted.

flooding. To the contrary, good timber practices recycle a valuable resource and aid the general ecosystem. We note that no mention is made of the natural devastation of forests because of wild fire or volcanic eruption. Those events have a much greater environmental impact than sound commercial timber harvest practices.

Continuation of O-098-055

4. Habitat loss and fragmentation – if the consideration is that the sole original purpose of earth was to serve as habitat for wildlife, that statement may be true. Not considered is the territorial nature of wildlife species which is also exclusionary and limits specie spread. Please note that human beings are as much a part of any ecosystem as are the wildlife. If the issue is that we displace them then the bottom line conclusion is that humans should be subordinate to existing species. Sorry that does not work for most of us.

O-098-056

O-098-056 Comment noted.

5. Competing water uses – the statement that use of water reduces its quality is not scientifically justified. Since most our water is the product of the natural evaporation/condensation water cycle, use does not alter the quality of water. Inappropriate use, such as government sewage plants discharging raw sewage into rivers, stream, lakes and Puget Sound do have a negative effect on water quality. At last count, the city of Victoria, located at the mouth of Puget Sound was discharging about 30 million gallons of raw sewage into the Straits of Juan De Fuca daily. How are either of those problems addressed in the policies?

O-098-057

O-098-057 Do not concur. See the Issue Paper on Environmental Planning. Victoria, B.C. is outside the four-county central Puget Sound region.

6. Filling Tidelands – this item is of great concern. The current economy of the region is dependent on the ports of Seattle, Tacoma, Everett, Bremerton, Keyport, Bangor, and numerous others. The graphic would seem to indicate that the development of these ports has been an overall negative for the environment. If that is the case, it would appear that corrective action would be to "restore" the area to a natural condition. Perhaps the first step could be to restore the original level to Lake Washington and to do away with the Ballard locks which interfere with the free passage of migrating fish species. It is also somewhat interesting to note that no mention is made of the ability of species to adapt to changing conditions. After we found Spotted Owls (that could only survive in old growth forests) nesting and thriving in KMART store signs one would have thought we could rethink our limited view of the survival abilities of wildlife.

O-098-058

O-098-058 Comment noted.

Page 10

Restore and sustain the environment - not a valid GMA goal or requirement.

O-098-059

O-098-059 Comment noted.

Page 10 paragraph 1
"the role the environment plays in our personal well being" – nice try. The total of influences and impacts on our individual lives constitutes more than "the environment". Social engineering is not one of the GMA goals.

O-098-060

O-098-060 Comment noted.

Page 10 Paragraph 2

"Environmental…..restoration"- not a valid GMA goal or requirement.

O-098-061

O-098-061 Comment noted.

Page 10 paragraph 3

"Sustainability" – this definition is not defined in GMA. To enter the commonly defined version without attribution is not appropriate. The definition offered does not appear in any common dictionary referenced. It would appear that this is a definition created by the environmental community and not one commonly used.

O-098-062

O-098-062 Comment noted.

Page 10 paragraph 3

"including the challenges associated with climate change" – this has no basis for inclusion. Climate change is a natural occurrence and is continuous over the life of the planet. We live and adapt to changing climatic conditions. As humans we are considerably more adaptable as is demonstrated through our nature as nomadic and transient residents to any area. Our entire history has been one of addressing near term and long term change. The one absolute is the climate will change. Just how these policies are to enhance our ability to cope with those changes is a bigger mystery than the schedule of change itself.

O-098-063

O-098-063 Do not concur. See the Governor's Climate Change Challenge 2007 and RCW 80.80.020.

Page 10 paragraph 4

"A sustainable approach is possible, given the regions recent successes in redirecting growth away from rural and natural resource lands into designated urban growth areas and centers" – this statement requires specific quantification and qualification. Exactly where have those successes taken place, what level of urban growth has occurred, what is the meaning of "recent", and many more questions surround the statement. Provide the specific data.

O-098-064

O-098-064 Do not concur. For examples, you might consult the American Planning Association website (planning.org) and the Urban Land Institute website (uli.org).

Page 10 paragraph 4

"greatly improved our air quality" – the more common understanding is that market forces have had a greater impact on air quality over the past 20 years that have regulations. Please provide specific reference and data to substantiate that government action is the prime reason for air quality improvement.

O-098-065

O-098-065 See the Puget Sound Clean Air Agency website (pscleanair.org).

Page 10 paragraph 4

"our recycling programs started in the 1980s" – once again common understanding is that while "recycling" programs may prevent materials for being directly dumped into local land fills they are far from effective in reduction in use of resources. Approximately 10 percent of newspaper is actually reused while the reuse of glass and general plastics is lower. The success of recycling programs depends heavily on local region industry to use the materials. Long distance transportation of recycled materials adds to the cost of production and limits the cost effective results of such programs. If we are actually seeing a reuse of materials that is cost and energy efficient that should be part of the policy since it establishes a baseline for future results.

O-098-066

O-098-066 Comment noted.

Page 10 paragraph 6

Vision 2040 identifies a growth pattern ….."that minimizes adverse impacts on the environment" – there is no justification for this statement in prior section or to be found in the remainder of the document. The Vision assumes that doing it this way will have minimal impact. There is no indication of any cause and effect study and certainly no fiscal impact study to justify that conclusion. If we have been planning under GMA for over 15 years and have not yet achieved the goals identified, what makes anyone think that this Vision and planning policies will be the panacea? This statement needs extensive supportive data and study to stand.

O-098-067

O-098-067 Do not concur. Also, see DEIS and SDEIS for more information and data.

Page 10 paragraph 7

"public policy steps to bend development …. transitions us into a more sustainable way of living" – this is well outside the authority and requirements of GMA and any elected body in this state. We the people did not delegate to the government the authority to determine how we would live. The concepts of social engineering contained in this paragraph are foreign to our very being as Americans. We would suggest that the drafters read our Declaration of Independence to better understand just how objectionable what they have written is to Americans.

O-098-068

O-098-068 Do not concur. This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

Page 11 Ways to Improve Ecosystem Conditions

1. This is another graphic that is not supported by written content in the document. Either link the graphic and give it credence or delete it.

2. Enhance Critical Areas - not a valid GMA goal or requirement.

3. Transfer of Development Rights (TDR) – although addressed in the GMA, this process has little support or actual understanding among real estate professionals or property owners. Under more classical understanding of rights of property ownership, sale or lease of the entire property or some portion of the property has been normal. Lease or sale of certain rights, especially mineral rights, has been a common practice. However, exercise of those rights has been physical in nature always remained with the property. Under TDR, a politically determined use of property can be transferred from one property to another. There is no physical link to the properties in question and the link is fully administrative. It is not clear of the process if subsequent political decisions eliminate to TDR process or if the process revises the classification of properties for which a TDR was originally acquired. The TDR process is one in which unintended consequences are yet to come home.

4. Replace diesel vehicles - not a valid GMA goal or requirement. How this is to be accomplished short of restricting the operation of diesel powered vehicles is not clear. Of course such a restriction would include automobiles, busses, trucks, train locomotives, ships and ferries, fishing craft and other small craft, naval vessels, and aircraft. They actually burn diesel!

5. Non-motorized Transportation – the continual dogmatic push for pedestrian and bicycle transportation is contra indicated. Over 85 percent of Americans polled several times over the past 15 years have repeatedly indicated a personal desire for a single family home in a suburban area as opposed to living in an urban environment. Further, workers are much more aligned to commuting by POV (privately owned vehicle) than by public transit because of flexibility, time, and reliability. The only way to achieve the "European" model of bike and walk is to concentrate all work and housing in close proximity one to another and then force people to live where they work. Once again, the Soviet model of that effort failed and the model certainly does not reflect the desires of average Americans.

6. Link Habitat – several of the unintended consequences of habitat trails through urban areas are now becoming evident. Although it was evident to those accustomed to living near wildlife, these conditions apparently eluded urban dwellers.
   a. Wild life is migratory and moves toward locations of food and minimal conflict
   b. Most wildlife land species are territorial and tend to defend their territory against all intruders.
   c. Wildlife mothers are especially protective of their young and tend to keep their young in close proximity but safe hiding.
   d. Wildlife operates on a much lower section of the survival scale than humans. If approached they will normally flee. If threatened or isolated they will attack
   e. Urban wildlife corridors provide direct and easy access to food (cats, dogs, garbage, garden plants, etc) and ready shelter.
   f. The event of more frequent presence and negative interaction between humans and

(Comment continues on following page)

O-098-069 Comment noted.

O-098-070 Comment noted. See RCW 36.70A.172.

O-098-071 Comment noted.

O-098-072 Comment noted. See RCW 80.80.020.

O-098-073 Comment noted.

O-098-074 Comment noted. See RCW 36.70A.160.

wildlife as a result of the urban wildlife corridors is neither safe nor necessary.

g. Wildlife does not have to remain an integral part of the urban environment to survive.

7. Restore shorelines - not a valid GMA goal or requirement. However, if the PSRC is adamant on this action, please start with Lake Washington which will certainly reap the most immediate gains with respect to salmon.

Page 12 paragraph 1

"part of a fragile and interconnect global environment" – this statement has no place in this document. The Vision is supposed to be addressing the region not the world. Once again, the drafters have made an assumption (fragile) which they then treat as fact. The drafters need to support this claim with extensive, valid scientific data.

Page 12 paragraph 1

"Water quality is critical to aquatic habitat and human health" – it would be much more appropriate to identify the human impact first.

Page 12 paragraph 2

"opportunities to enhance the regions environment" -not a valid GMA goal or requirement.

Page 12 paragraph 2

"By treating and reusing storm water …."- this opportunity has been repeatedly negated by state regulation. Efforts to outfit homes with rain barrels and/or rain cisterns for use in garden irrigation have be impacted by an unnecessary water rights permitting system. Major developers are forced to establish drain paths for retention ponds rather than reusing the water for local irrigation. In areas (such as Kitsap) where direct local recharge of aquifers is critical to water supply not using storm water efficiently is not logical. The reuse of storm water for irrigation would also help local stream flow since nearly all streams are fed as a relief to local aquifers. Since the only source of water is rain, it makes sense to put as much of that water on the ground for recharge as possible. Similarly, septic systems provide ground water recharge while municipal sewer systems simply dump treated effluent to sea. Sewer systems take vital fresh water and waste it. In addition they have a long history of raw sewage spills to the same water. It is difficult to understand how a properly functioning septic system is worse for the environment than a municipal sewer system.

Page 12 paragraph 3

"New industries and economic opportunities related to clean technology and renewable energy are quickly developing" – while interesting it provides little information necessary for policy development. The region is slated for 1.2 million new jobs. That does not include the transition jobs that must occur as current employers depart or transform themselves. Since we have essentially cut ourselves off from the more common natural resources (timber, mine minerals, petroleum, etc) it is hard to envision any major growth in manufacturing under the criteria established by this Vision. In fact a significant net loss of manufacturing is anticipated as a direct result of the policies, based on past performance.

Page 12 paragraph 3

"a global hub of services, business, and products that are environmentally beneficial" – missing from this discussion is the source of natural resources to create the products, the sources of power to support both the population and business growth and the infrastructure necessary to support

(Comment continues on following page)

Continuation of O-098-074

O-098-075

O-098-076

O-098-077

O-098-078

O-098-079

O-098-080

O-098-081

O-098-075 Comment noted.

O-098-076 Do not concur.

O-098-077 This paragraph has been deleted from VISION 2040.

O-098-078 Do not concur. This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-079 Comment noted.

O-098-080 Comment noted. See the Economy section and the Issue Paper on Economics.

O-098-081 Do not concur. See the Economy, Transportation, and Public Services sections. Also, see the Issue Papers on Economics and Transportation.

both. Thus far in the Vision, most effort and discussion has been directed toward restoring an environmental condition that is directly contrary to the needs for population growth and economic development.

Page 12 paragraph 4

"Using our evolving understanding of best environmental science" – this Vision has demonstrated no application of real science or the scientific method to this point. Policies can not be based on "evolving science" unless the policies are to be little more than wind vanes. Before we obligate the population and the economic future of this region to a course of action, we had best be very certain of our facts and the most probable outcomes of our actions. Continuously revising policy to provide for a politically selected worst case or disaster scenario is not sustainable and will eventually result in failure for both the citizens and the economy.

Page 13 Vision Statement

"a preferred pattern of urbanization designed to minimize environmental impacts, support economic prosperity, create adequate and affordable housing, improve mobility, and make efficient use of existing infrastructure" – the statement is filled with contra indicated platitudes.

1. Most Americans do not (that is DO NOT) desire to live in densely populated urban areas.

2. Continued development of urban areas will have continued negative impact on the environment in and adjacent to those areas. History demonstrates that cities, regardless of the p best laid plans of governments, are not the best or chosen environments for human growth and development. I hope we are still talking about people as the prime benefactors of this planning.

3. Highly developed UGAs have little or no availability to easily accommodate growth for 1.2 million jobs. The very nature of the planning and the fiscal impacts associated with UGA development for business will force business away from the area. Our current history clearly indicates that both the state and the region are considered high risk for new business development. A policy statement that does not address the reality is little more than a political talking point.

4. As population density increases in a UGA and as we try to force business into the same UGA to accommodate a created housing/job proximity several things will occur. The price of land will escalate rapidly. The only opportunity for "affordable housing" will either be through incentives to the builder or subsidies to the occupants. Both of those require public funding and impact directly on the availability of funds for other necessary infrastructure. It is clear that occupants of "affordable housing" are not normally the best trained and equipped to enter the job market. The businesses that might locate in proximity to "affordable housing" will most commonly be low skill employment. The workers will be reliant on public transportation for access to work and will normally require some form of subsidy. The cost of living in the UGA will normally be higher than in rural areas thus requiring additional support for the workers. We have a national history of the most probable outcome of this policy. Detroit, Cleveland, Chicago, New York, and New Orleans can provide ample stories of best intentions gone bad. Why do we insist on following that failed model?

5. As density is increased in existing urban areas, additional unplanned stress is placed on

(Comment continues on following page)

9/6/2007

Continuation of O-098-081

O-098-082

O-098-083

O-098-082 Comment noted.

O-098-083 Comment noted.

infrastructure systems that were not designed or constructed for the *increased demand. If construction of new infrastructure is expensive, replacement cost in a built environment is significantly higher. Once again the lack of fiscal impact is telling. The cost of installing or improving the existing water, sewer, and electrical system in any of the designated centers could, by itself, limit future growth.

Continuation of O-098-083

Page 14 paragraph 1

"The GMA calls for development to be focused within designated UGA" – not true. The exact words from the GMA are from RCW 36.70A.020 Planning Goals "(1) Urban Growth. Encourage development in urban areas ….." The effort by the PSRC staff and Board Members to "rewrite" the GMA is totally inappropriate. The law is clear. Follow the law.

O-098-084

Page 14 paragraph 1

"Vision 2040 takes the act's mandate one step further" – first, the GMA does not have a "mandate" on forcing growth into UGA. Second, decisions regarding UGA boundaries and UGA densities are reserved to the counties and cities, not PSRC.

O-098-085

This sentence also addresses the concept of "centers". GMA does not define, address, or deal with centers. Centers are a product of the Regional Transportation Authority (RTA) and are not directly associated with GMA. This however, is the real hook used by PSRC for compliance with Vision 2020 and now 2040. Since PSRC is the controlling authority for distribution of federal and state transportation grant funds, compliance is required for funding.

O-098-086

Page 14 paragraph 2

"The development of centers is at the heart of the regions approach to growth management". – an interesting approach since GMA does not define or deal with centers. Has PSRC simply rewritten GMA to the PSRC version?

Silverdale was designated a "center" in return for some federal funding for the Highway 3/305 interchange. The Silverdale center encompasses "Old Town" and the southern portion of the retail center. This is the same part of Silverdale that current residents are most interested in keeping essentially unchanged. Under the "Vision" policies, directing population and job growth to the center will have an opposite impact. In order to accommodate the population growth, the area will become home to multi-story, multi-family housing. Because the most probable job growth will be retail or service related the housing will be in large part unaffordable. How this directed growth is, or will be, in the best interest of the citizens of Silverdale or the Central Kitsap region is difficult to understand.

O-098-087

Page 14 paragraph 3

"high efficiency transportation system linking these centers ….. reduce the rate of growth of vehicle miles traveled" – it is not apparent why a highly efficient transportation link between centers is essential if the centers are supposed to support both population and employment for those who work there. It is clear however that the real objective is to make use or reliance on POV a thing of the past. Unfortunately, in Kitsap with the current reverse of the accepted best practices model on housing/job relationship and a very low probability that the major employer can or will relocate to accommodate this Vision, the plans do not match reality. A public transport system that moves the majority of the Kitsap work force from home or near home is cost prohibitive and impractical. The commute time involved would be unacceptable. The loss of available citizen support time to the community and the impact on commute time on family time would destroy all semblances of family and community. In Kitsap County, the POV is here to stay pending a major technological breakthrough.

O-098-088

O-098-084 Comment noted.

O-098-085 Comment noted. See the discussion in Part II: Regional Growth Strategy and the Development Patterns section.

O-098-086 The statement does not say that GMA addresses centers — it says that VISION 2040 does. Also, note that centers are not a product of RTA planning.

O-098-087 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (see response to O-098-003). Also, note that centers are a VISION 2040 response to a GMA goal. Last, see new requirements in the Commute Trip Reduction law related to centers.

O-098-088 Do not concur. This concept is established in existing public policy and is clear in VISION 2040.

Page 14 Regional Geographies

Page 14 paragraph 1

"provides for the distribution of growth to regional geographies" – GMA says that Office of Financial Management (OFM) makes that distribution to counties and cities. How does PSRC get a distribution? What is the concept of regional geographies and how does that relate to centers, UGA, cities and counties? Is there any way to make this entire process more confusing?

O-098-089

Page 14 Paragraph 2

"regional landscape has been divided into seven types of geographies" – perhaps call demographic profiles. Geography, indicating latitude and longitude, or a set of physical characteristic of the area, does not seem to be a key factor in defining the seven types. There is no real explanation as to why this methodology is superior to letting counties and cities do the job they are charged to do. It appears that this is little more than a PSRC control feature of the Vision.

O-098-090

Page 14 paragraph 3

"strategy focuses the majority of the region's employment and housing growth into both metropolitan and core cities" - not a valid GMA goal or requirement.

O-098-091

Page 14 paragraph 3

"centers in these cities are intended to attract residents and businesses because of their proximity to services and jobs" – this is directly contrary to the long time and continuing indicated desires and plans of Americans. Perhaps knowing that since 2000, 95% of the population growth associated with Portland, the smart growth/growth management poster city, has been outside city limits. Is there a message there?

O-098-092

Page 15 paragraph 1

"These cities are the major civic, cultural, and economic hobs for their respective counties" – this may be a vision but it is not the existing condition. Bremerton, without the shipyard, is a virtual economic wasteland. While progress is being made, recovery is still in the distant future. To designate Bremerton a civic or cultural center of the county simply demonstrates how devoid the county is of either.

O-098-093

Page 15 paragraph 2

"metropolitan cities to accommodate 32 percent of regional population growth and 42 percent of regional employment growth" – For Bremerton, this equates to roughly 30,000 new residents and 14,000 new jobs. Realistically that means doubling housing capacity within existing boundaries (Bremerton can not simply annex a bunch of people to get the numbers). It also means about doubling the current civilian employment of the largest employer Puget Sound Naval Shipyard (PSNS) or finding other employers to fill the gap. A little more detail on just how this will occur would be helpful is assessing the reality of the policies.

O-098-094

Page 15 paragraph 4

"intended to accommodate a significant share of future growth…….Contain key hubs for the region's long range multimodal transportation system and are … employment centers"

Silverdale is now little more than a major retail center. Large numbers of retail employees do not reside in Silverdale and may commute from outside the county because of the cost of housing. If Silverdale is

O-098-095

(Comment continues on following page)

O-098-089 Comment noted. The regional geography unit of analysis leaves city level growth target decisions to the countywide planning process that is required under state law.

O-098-090 Comment noted.

O-098-091 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-092 Comment noted.

O-098-093 Comment noted.

O-098-094 VISION 2040 addresses this issue by providing regional guidance in Part III: Multicounty Planning Policies and the associated actions.

O-098-095 Comment noted. The designation of all centers is initiated at the local level by the city or county.

a "transportation hub," that must equate to a bus transfer station. The road systems now and planned into 2012 do not facilitate transportation in, around, or through Silverdale. Plans for civic and cultural development exist but the funding and the drive to make plans reality seem to get lost in politics. For Silverdale to accommodate 18,000 new residents and 15,000 new jobs seems a bit ambitious. Population growth could require up to 8.5 million square feet of housing in an already full UGA. It would appear that vertical growth in Old Town and the Silverdale center will be necessary to accept that growth. Since Silverdale has nowhere near 15,000 jobs today and since a vast majority of the local area workers commute to work (including the east Sound commute) job growth will be problematic. The local major employers are the Navy and the Harrison Hospital. No significant growth in the Navy is anticipated and the hospital will certainly be a leader in jobs but not to the level projected.

Continuation of O-098-095

Page 16 paragraph 1

"are home to important local and regional transit stations, ferry terminals, park and ride facilities, and other transportation connections" – if there was any doubt as to the underlying driver for growth planning and distribution this paragraph and the "Small Cities" section clear all doubt. The entire distribution of population is predicated on transit systems and the drive to end the use of POV as a primary transportation mode. For whatever reason, the belief that trying to center all future growth around "transit hubs" and corridors will be the ultimate solution to the ills of the world, does not recognize reality. No matter how hard the ultimate planners have tried for the past thirty years no metropolitan area except perhaps New York, has established public transit as the primary mover of people. In general transit use is not more than 3% of commuters. Transit has a place in the mix and may become more used as time goes on but there is no realistic way to force people into mandatory use of transit short of banning POV. This vision is not far from that step.

O-098-096

Page 16 paragraph 4 and Page 17 paragraph 1

The Small Cities and Unincorporated UGA appear to be the left behinds in this policies. Together they accumulate population with much smaller growth in jobs. It does appear that the break is contrary to the general policy of the job/housing criteria and the impact when these jurisdictions/entities are either annexed or incorporate. Does the policy not establish a future trend for difficulty with the policies or is there a follow-on set of policies that are being planned for?

O-098-097

Page 18 paragraph 1

"follows the GMA guidance in support of long tern use of rural and designated natural resource lands" – first, GMA provides guidance for the various land "types" separately. To commingle land classification types is to attempt to indicate that rural areas are covered by some type of protective cover so as to preclude their development. Rural areas are subject to a specific GMA section (RCW 36.07A.011). That section clearly permits and provides for development of rural areas and provides some guidance for such development. RCW 36.07A.060 (5) (b) specifically states "the rural element shall permit rural development", and "provide for a variety f rural densities". PSRC has no basis for interpreting GMA to be more restrictive to the point of development exclusion.
Second, the term "cottage industries" does not appear in GMA. The term use in GMA is rural industries. IN Kitsap County, our primary employer has major employment centers located in rural areas. That trend will continue with South Kitsap Industrial Area located in rural Kitsap. Annexation of SKIA by Bremerton would be little more than a tax base move and do nothing to change the rural nature of the location.

O-098-098

Page 18 paragraph 2

"regional growth strategy provides guidance on levels of residential growth in rural areas, encourages

O-098-099

(Comment continues on following page)

O-098-096 Comment noted.

O-098-097 Do not concur. VISION 2040 includes provisions important to all areas.

O-098-098 This provision is within the authority of the Regional Council under state and federal law and the interlocal agreement with its members (also, see response to O-098-003).

O-098-099 VISION 2040 supports, but does not mandate, the use of transfer of development rights.

TDR from rural areas" – decisions on rural growth are more properly reserve to the individual counties, as set forth in GMA. The global policy suggested is actually a now growth policy strictly limiting growth in rural areas. The impact of such a policy on the ability of any county to properly support future growth and to maintain a proper balance of housing opportunities is not acceptable. With respect to TDR, RCW 36.07A.100, dealing with innovative techniques, identifies TDR as one possible technique that should be included in Comprehensive plans. It is fully inappropriate to dictate the use of TDR or to even suggest use of TDR top control rural development.

Continuation of O-098-099

Page 18 paragraph 3

"or to accommodate a great deal of residential or employment growth" – this may be true in King, Pierce, or Snohomish where most rural land has already been developed and that remaining is either in the foothills of the Cascades or taken up by federal lands and installations. In Kitsap County, short of initiating policies that actually lead to the destruction of the character of the area and which would be contrary to the wishes and desires of the majority of the citizens of the county, continued development of rural areas at a rate of 30 to 45 percent of growth will continue.

O-098-100

Page 18 paragraph 4

"Regional guidance calls for reduced rural population growth rates in all counties" – this statement assumes an authority not delegated by the people. The determination of population allocation to rural areas is assigned to the County and not a "regional" council or board. The very idea that a "Regional" policy could be directive in nature to an elected county government is contrary to our Constitution. It is also of interest to note that failure to be in compliance with GMA or to be responsive to OFM population distributions can lead to sanctions against a county. There is no methodology to sanction PSRC, thereby making PSRC, in its own eyes, an ultimate authority with out accountability.

O-098-101

Page 18 paragraph 5

"Lands designated as …. shoreline,,, are grouped together as natural resource areas". – There is no reference in GMA that make "shorelines" part of the areas defined as natural resource areas. RCW 36.07A.480 provides clear direction on the manner in which shorelines will be addressed and make the shorelines issue an n additional GMA goal. There is a GMA goal dealing with natural resource industries but no separate goal for natural resource areas. Because shorelines are urban and rural, residential and industrial/commercial and developed and undeveloped, attempting to directly link those areas with an overall policy on natural resource areas will not work. In addition, no separate definition of natural resource areas has been provided. However RCW 36.07A.170 does include Agricultural lands, Forest lands, and Mineral Resource lands as Natural Resource lands. It is entirely possible, based on the demonstrated ability of PSRC to develop unique interpretations of GMA, that natural resource lands could encompass all lands within the region boundaries.

O-098-102

Page 18 maps

It is of some interest to note that while Kitsap County has major rural areas it has little or no natural resource lands. The property owners who have been working for over 15 years to achieve equitable treatment for their forest lands will be surprised by that they are not considered as natural resource lands. What is the origin of the graphic data? What is the fiscal impact to the owners of the land designated as natural resource lands? Has any fiscal impact been completed, as required by GMA?

O-098-103

Page 19 paragraph 2

"regional population and employment forecasts…. Developed by PSRC" – OFM executes a statistical analysis program to prepare the growth forecasts and to make population allocations to counties. How

O-098-104

(Comment continues on following page)

O-098-100 Comment noted.

O-098-101 This provision is within the authority of the Regional Council's mandates under state and federal law and the interlocal agreement with its members (see response to O-098-003). Also, see RCW 36.70A.110 and RCW 36.70A.210.

O-098-102 VISION 2040 has been revised to address this issue.

O-098-103 VISION 2040 includes fiscal analysis at the appropriate scale for regional planning. See Fiscal Impact sidebar in Part III: Multicounty Planning Policies.

O-098-104 Both the state and PSRC are mandated under the law to provide forecasts. The two efforts are coordinated.

is that process different from or less accurate than the PSRC effort? Why should citizens pay for a duplicative effort? By what authority does PSRC override the OFM distributions to assimilate them into a "regional" distribution?

Page 19 paragraph 2

"Overall percentages of regional and county growth may be more useful for local planning than the specific numbers contained in the forecasts" – this is simply not true. In order for any jurisdiction to properly understand the distribution facing them they need the best possible estimate of actual numbers. Numbers equate to housing units, road loading, service requirements, school attendance, and work space requirements.

Page 20 Paragraph 1

"The strategy for regional growth is intended to guide the region's cities and towns as they periodically update local residential and employment growth targets …. And amend their local comprehensive plans." – it is no oversight that counties are not included in this strategy statement. If a regional strategy exists, there is little or no need for counties to develop a separate strategy; they can simply implement the regional strategy under their local cover. There is no provision for "regional guidance" to cities and towns or counties under GMA. It simply does not exist.

Page 23 Paragraph 1

Multicounty planning policies …. and others" – the entire paragraph is inappropriate and without basis. There is no regional authority for growth planning or land use regulation. There is no basis for a "common framework" for county and city Planning policies or Comprehensive plans other than as provided for in GMA. To accept the assumed authority of PSRC would then allow PSRC to create and dictate, on a regional basis, all of the subordinate ordinances and plans required under GMA.
Page 23 paragraph 2

"to limit development in … rural areas" – there is no basis for this policy and it is contrary to the provisions of RCW 36. 70A.070(5). It is fully inappropriate for PSRC to attempt to make policy decisions that are reserved to the county.

Page 23 paragraph 3

Under the GMA, multicounty planning policies.." – please provide the specific GMA paragraph reference that provides for such policies. The provisions of RCW 36.07A.210(7) are clearly not applicable because the base criteria are not met. As such, with respect to Kitsap County, this document has no legal basis.

Page 23 paragraph 3

"has both practical and substantive effects on city and county comprehensive plans" – this phrase would made the policies directive in nature when no such authority exists.

Page 23 paragraph 3

"consistency among cities and counties on regional planning matters" – the GMA reference (RCW 36.070A.100) would invoke the related regional issues criteria. That would be transportation. Kitsap has no contiguous border with the other three counties and we are clearly separated from all three by Puget Sound. To claim ferry terminals as common borders would allow extension of the region to all areas west of the Cascades or perhaps the entire state.

Page 23 paragraph 3

Continuation of O-098-104

O-098-105

O-098-106

O-098-107

O-098-108

O-098-109

O-098-110

O-098-111

O-098-105 Comment noted.

O-098-106 Do not concur. Multicounty planning policies are required in GMA. See RCW 36.70A.210 and RCW 47.80.

O-098-107 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-108 Do not concur. See GMA goal on sprawl.

O-098-109 Do not concur. The legal basis is found in RCW 36.70A.210.

O-098-110 Comment noted.

O-098-111 Comment noted.

"regional processes, including the review of local comprehensive plans" – clearly a direct violation of the sovereignty of counties and cities. There is not provision in GMA for such regional oversight or review. In fact, under RCW 36.07A.280, PSRC does not qualify as an entity that may make appeal to the Growth Management Hearings Board. Of note, the inclusion of PSRC oversight on transportation projects seeking funds, although having no direct correlation with comprehensive plans, is clearly an effort to exert control through purse strings control. O-098-112

Page 24 Paragraph 1

This paragraph, while perhaps acceptable as prose, has no place in this policy document. The end objectives are not consistent with and far exceed the planning goals of GMA. If the PSRC staff or Board members really want to save the planet, perhaps they should do so on their own time and their own dime. The generalities offered as an "approach" do not lend themselves to the metrics necessary to assess achievement and are so poorly defined as to permit almost any action under their cover. O-098-113

Page 24 Paragraph 2

This paragraph establishes the environment as the primary concern for these policies. No basis has been provided to make that priority assignment, with relation to the other 13 GMA goals, as is required by GMA. O-098-114

Page 24 paragraph 3

This explanation of the Vision statement provides no link to or consistent effort to implement the legislative finding that is the basis for GMA. RCW 36.07A.010 establishes the clear intent to the GMA and its general implementation. The Vision 2040 statement is far removed from that guidance. O-098-115

Page 24 paragraph 4

This paragraph clearly states that it exceeds the requirements and the guidance of GMA. In addition, there is no provision in GMA to address global climate change as a county growth planning issue. The PSRC certainly has no authority to rewrite GMA to meet its political agenda. O-098-116

Page 24 paragraph 4
Vision 2040's environmental policies seek to protect and restore" – there is no provision in GMA for restoration of natural resource or habitat areas. PSRC has not identified a baseline for restoration or any reasonable metrics to gage achievement. This is simply an open ended policy goal to assign assets and control growth (not manage growth). O-098-117

Page 24 paragraph 5

"focusing growth within the urban growth areas to create compact pedestrian friendly communities" – this is not a GMA goal and is contrary to the general provisions of GMA regarding preserving community character and housing choices. There is no fiscal impact provided to assess the public and private cost of this policy. For example, to achieve a "compact pedestrian friendly community" requires the inclusion of the full range of routine private sector services necessary for "quality of life". Exactly how do the policies address bringing those service providers into "pedestrian" reach of the residents of these communities. Perhaps a closer relationship with the private sector regarding their criteria for locating and providing services and the actual cost impact of those services is in order before a policy is issued. O-098-118

O-098-112 Do not concur. This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-113 Comment noted.

O-098-114 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-115 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-116 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003). RCW 80.80.020 establishes goals for the reduction of greenhouse gases.

O-098-117 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-118 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (see response to O-098-003). Also, see RCW 36.70A and RCW 47.80.

Page 24 Paragraph 5

"All citizens will be assured safe and affordable housing" – What is the cost of this policy and who will bear the burden that cost. Does this imply that every citizen will also be assured his choice of housing? This social engineering policy, drive by pure political agenda is not consistent with the goals of GMA. Housing is not a right. Housing is a privilege that must be earned.

O-098-119

O-098-119 VISION 2040 has addressed this issue in the policies, actions, and measures.

Page 25 paragraph 2

"They are designed to address what is to be accomplished and why" – this is another statement that makes the PSRC policies directive in nature, contrary to the lawful authority of county and city government.

O-098-120

O-098-120 Comment noted. This is a general statement on how policy language is typically designed to accomplish an outcome.

Page 25 paragraph 3

The inclusion of Transportation Planning elements throughout the policies, to lend credence to policies that might not stand alone is inappropriate. There is a transportation section in the Vision. Include all transportation policies there. If there is a relationship between a non transportation policy and a transportation policy it should have simple reference. GMA does not require or establish as a goal that all planning should be based on transportation planning. To the contrary, the GMA concurrency requirements, foster natural development schemes to satisfy all 14 goals and require services to maintain pace with that development. Transportation is neither the horse nor the cart; it is but one of the passengers making the journey.

O-098-121

O-098-121 VISION 2040 has been revised. Also, note that the policies are crafted to be mutually supportive and not as a series of stand-alone provisions.

Page 25 paragraph 4
"These actions lay out responsibilities and tasks for implementation" – once again a directive in nature tasking not within the authority of PSRC.

O-098-122

O-098-122 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

Page 25 Paragraph 5

With regard to providing metrics and means of assessing achievement, the material in Appendix 2 falls far short of that required. There are few if any specific goals or objectives identified in quantifiable terms. The assessment criteria is as much subjective as objective. There is no guidance for actions to be initiated if objectives are not being met. There is no identification of the assignment of assets, the cost for assessment, the actual responsibility for assessment and analysis of results and meaningful reporting to the public. Appendix 2 is a "paper tiger".

O-098-123

O-098-123 Comment noted. See revised language to Part IV: Implementation on Measures and Monitoring.

Page 25 Administrative

Page 25 paragraph 1

The paragraph refers to RCW 36.07A.100 by does not provide a direct quote. The interpretation provided by the drafters is incomplete and incorrect leading to an invalid conclusion. Please provide a direct and complete quote of the section and then justify the existence of the document.

O-098-124

O-098-124 To improve readability, VISION 2040 does not include citations for each of its provisions.

Page 25 paragraph 1

The paragraph includes various local, state, and federal and tribal planning agencies in the four county region. GMA specifically delegates the authority to determine inclusion of federal agencies and tribes to county and city government. The inclusion of tribes not resident in any one county imposes a burden on

O-098-125

O-098-125 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

(Comment continues on following page)

that county not supported by GMA or the constitution.

Page 25 paragraph 1

"as well as give a time frame for updating county wide planning policies." – another indication of assumed authority by PSRC. GMA provides specific guidelines on updating all required ordinances and policy documents.

Page 25 BOX

"The region's tribal governments are key players in planning for our future" – This is an assumption stated as fact. The GMA makes provision for tribal participation by the permissive "MAY". There is no requirement that tribes be included at any level and certainly no provision for review of county and city documents by a tribe except as provided for by that local jurisdiction.

Page 25 BOX

Instead of the prose contained in the sentence starting "However, the Act" please provide the specific wording of RCW 36.07A.210(4).

Page 25 POLICIES

MPP-A-1 The "common borders" requirement eliminates Kitsap County except under the most extreme interpretation that cross-sound ferries constitute a border.

MPP-A-2 This policy is directive in nature requiring counties to perform without having such authority, In addition, CCP update schedules are the purview of the state legislature and provided in GMA. RCW 36.07A.040 and .210 refer.

Page 27 ENVIRONMENT

Page 27 Goal Statement

The goal statement once again includes "restoration of natural systems," which is neither required nor supported by GMA. The lack of a definitive baseline and credible metrics to assess achievement would by themselves render this goal meaningless notwithstanding its invalidity under GMA.

The goal statement identifies "reducing greenhouse gas emissions" and "preparing for climate change impacts." While certainly the environmental cause d'jour, those two "goals" are not consistent with or identified as GMA goals. As with the comment above the lack of a definitive baseline and credible metrics to assess achievement would by themselves render this goal meaningless notwithstanding its invalidity under GMA. These two "goals", separate from all other would most certainly require a fiscal impact statement. That statement must identify not only the cost to government (taxation cost) but also the individual cost to citizens. The unintended fiscal consequences of some recent environment driven decisions are already being felt widely across the market place. The impact on use of food or feed crops to support bio-diesel production appear to causing food price increases which impact most directly those least able to cope with that impact and who have least to gain from the policy.

It is important to note again as we begin to review specific policies, there is nothing in GMA that would suggest or require local jurisdictions to create or invoke policies that are not consistent with the findings and intent of GMA. GMA does require local jurisdictions to exercise proper process and judgment in applying all 14 GMA goals with equal priority. Nothing in GMA relieves the elected officials of local jurisdictions from their sworn duties to the individual citizens of their jurisdictions. Nothing in GMA suggests or requires that GMA become a vehicle for political global action.

Continuation of O-098-125

O-098-126

O-098-127

O-098-128

O-098-129

O-098-130

O-098-131

O-098-132

O-098-133

O-098-126 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-127 Comment noted.

O-098-128 To improve readability, VISION 2040 does not include citations for each of its provisions.

O-098-129 Kitsap County also shares a physical boundary with Pierce County.

O-098-130 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-131 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-132 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (see response to O-098-003). Also, see Fiscal Impact sidebar.

O-098-133 Comment noted.

Page 27 paragraph 1

"The surroundings create stunning backdrops" – nice prose but not relevant to the subject at hand. Those natural resources, a product of plate tectonics, are in fact a natural resource to be properly exploited not some hanging on a living room wall. Were it not for the prior development of those natural resources, none of use, including PSRC staff would have the tools or standard of living we enjoy today. Please leave the prose on the cutting room floor and stick to facts and findings supported by those facts.

O-098-134

O-098-134 Comment noted.

Page 27 paragraph 2

The sense of this paragraph is that past development has been basically a series of poor decisions made by people who either did not understand or did not care. Apparently the PSRC staff and the drafters have a level of knowledge and understanding not available to citizens in general. Land in all forms is a natural resource given to man to allow him to develop and expand his abilities. That our nation has made best possible use of that capacity over time (about 400 years) to rise to our preeminence in the nations of the world is not magic or a mistake. The United States is the provider for the world because of innovation and effort. To even suggest that our expansion in our own country is "encroachment on natural resource lands" has no validity and condemns each of us as failures. That may be the self analysis of the PSRC staff, but that analysis cannot be extended to the people of our nation. This level of political positioning has no place in a policy document but it does clearly identify the low esteem to which PSRC holds the citizens of the region.

O-098-135

O-098-135 Comment noted.

Page 27 paragraph 4

"region will face environmental changes over the coming decades.. from the global occurrence of climate change"– what is new about environmental change. Even the global warming crowd agrees that climate change and environmental change are natural occurrences. What is the point? GMA does not require or establish goals for action to solve global problems.

O-098-136

O-098-136 See the Governor's Climate Change Challenge 2007 and RCW 80.80.020. Also, see the Puget Sound Clean Air Agency reports on climate change for more information.

Page 27 paragraph 4

Research by PSCAA indicates that seal level rise and …" – interesting comment. When did PSCAA become the home of global climate experts? What is the specific source of the data that they collected and analyzed? Does the "research" meet the test of "scientific method? If so, where has that work been published and who has completed peer review? Does not staff have a better and more widely respected source of research and scientific evidence for this claim?

O-098-137

O-098-137 See EIS and VISION 2040 Issue Papers. Also, see Clean Air Agency reports on climate change for more information.

Page 27 paragraph 4

After the strong emphasis on the threat of global climate change, the paragraph then notes that impact is "likely to increase the rate of coastal erosion", "probably create severe pressure on the already stressed Puget Sound salmon population" and "could also lead to more noxious pest infestations". It would seem that while the certainty of change exists, there is no real definitive understanding of the outcome of that change. That, in turn, would make the policies addressing the results of change little more than guesses based on assumption. As has so often been the case, we find staff making thinly supported assumptions, translating those assumptions directly to fast and then acting on the derived "facts." If policies are to be based on assumptions, such policies must be stated in that context and must be constantly monitored for the validity of the underlying assumption. It is not appropriate to create a set of policies based on assumption and later claim that the assumption did not come to pass because of the effectiveness of the policy.

O-098-138

O-098-138 Comment noted.

Page 27 paragraph 4

"increases in the region's population and employment do not have to result in deterioration of the environment" – this indicates that such increases would normally have an impact but that by some policy action we can negate the impact. I question how increasing region population by over 1 million people cannot have an impact on environment. It has been made clear in this document that any human impact on environment is considers to be negative. Is there a shift in understanding in this policy area? What is the real policy basis? Does development by humans impact environment? If so is that impact negative? If not what human development is either neutral or positive and how is the determined?

O-098-139

Page 27 paragraph 4

"have cleaned up polluted waterways,……to more energy efficient forms of construction and mobility" – the entire list of corrective measures identified and the successes achieved have been mainly the result of market forces and individual action. While the clean water act was an initial driver for polluted water way clean up, market forces and cost savings became more prevalent as technologies evolved. The issues of more energy efficient and construction and transportation was clearly market driven and continues to be market driven today. The natural tendency of local government to be reluctant to embrace technological chance with a "not invented here" attitude has been the single greatest restrain on exploitation of those technologies.

O-098-140

Page 27 paragraph 5

The long list of agencies (not defined) and others "working to improve our environment" seems to leave out the individual property owner who is exercising good stewardship of his land. Of note, the property owner normally proceeds with his effort at cost to himself while the agencies and groups named normally are funded through taxes or grants (public grant is another way to say tax). Additionally, the individual property owner is success oriented because he anticipates action taken will derive desired results, The agencies and groups are process driven because continuing the process and funding is more important than achieving results. When results are achieved there is no need for continuation of the efforts of those agencies and groups. That probably explains why governments grow larger and how entities like PSRC come into existence.

O-098-141

Page 28 paragraph 1

Once again the concept of restoration of the natural environment is invoked without benefit of either GMA requirement or any mention of baseline. No matter how often the "restore" word may be used, it is not acceptable as part of this, or any other policy, driven by GMA.

O-098-142

Page 28 Paragraph 1

"Land use, transportation, and human health are interconnected and therefore require integrated planning, regulations, and implementation actions" - this statement is assumption acted on as fact. There is no evidence presented as to the validity of the statement. The antithesis would be that with out these integrated actions humans could not be healthy. Shall we then assume that for all of Washington, only persons living in the region will be assured good health be cause government has acted?

O-098-143

Page 28 paragraph 1

"regions approach to greater environmental stewardship is to improve coordination and increase commitment to sustaining the environment through conservation of resources, protection of habitat, and restoration of natural systems" – Once again we find restoration, not supported in GMA as a primary

O-098-144

(Comment continues on following page)

O-098-139 See EIS and VISION 2040 Issue Papers for more information.

O-098-140 Comment noted.

O-098-141 VISION 2040 has been revised to address this issue. See also the discussion of the importance of individual stewardship in environmental protection.

O-098-142 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-143 Do not concur. See VISION 2040 Issue Papers on Health and Transportation.

O-098-144 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

goal. Additionally, it is of interest that there is no mention of stewardship by individual property owners. It is apparent that the only solution to the existing problems (not yet defined) id coordinated government action. Perhaps some emphasis should be given to restoration of a natural system of freedom and liberty that exists when government is restrained from over stepping the authority delegated to it by the people.

Page 28 paragraph 2

"Make use of up-to-date environmental information" – GMA requires use and application of Best Available Science. It would be nice to think that PSRC would consider that as a mandate.

Page 28 paragraph 2

"address climate change" – this is well outside the authority assigned by GMA for land use regulation. Further, notwithstanding the unsolicited and unsubstantiated "evidence" that disaster is just around the corner, just what sort of actions would satisfy this goal? While leadership is admirable, it is best to have a firm and well defined destination before stepping off to lead. There is no destination here.

Page 28 paragraph 3

"Vision 2040 stresses the importance of the natural environment" – GMA is very specific about equal priority of goals. No matter how much PSRC may want to use GMA for a political agenda, it may not do so without clear and substantive justification. Such argument has not been provided. Just because staff thinks something to be true does not make it true.

Page 28 paragraph 2

"also takes into account its (environment) strong role in economic activity, including recreation and tourism" – most of the economic activity in the region is here to exploit our natural environment. While tourism and recreation are significant, it is not clear how land use planning and ultra-urbanization of the area support either. Thus far, it would appear that the plans for population placement would do more to harm or disrupt the nature of our area than to enhance it.

Page 28 paragraph 3

"development of a regional open space system is embraced" – it is not clear how "open space" reaches across Puget Sound to include Kitsap.

Page 28 paragraph 3

"region's approach addresses environmental stewardship, the care of our land.. ' – in fact the approach offered has small if any role for stewardship by owner. The land in question is not "our" land, it is the private property of citizens.

Page 28 paragraph 4

The definition of "stewardship" is not the "common" definition> It is a definition created to support the concept of public control and management of private property.

Page 28 paragraph 5

This paragraph is an statement of philosophical science and management that support a particular political agenda. Many of the development practices mentioned are already in use because they are cost effective and provide a better product. The developers had to fight government to implement many of the practices. Of note, an equal number of development requirements imposed by government are

Continuation of O-098-144

O-098-145

O-098-146

O-098-147

O-098-148

O-098-149

O-098-150

O-098-151

O-098-152

O-098-145 Comment noted.

O-098-146 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (see response to O-098-003). Also, see the Governor's Climate Change Challenge 2007 and RCW 80.80.020.

O-098-147 This statement does not address priorities among goals.

O-098-148 Do not concur.

O-098-149 Do not concur. The statement is at a conceptual level. The details of a regional open space system are not established in VISION 2040.

O-098-150 Comment noted. See the revision to add a statement about property rights.

O-098-151 Comment noted.

O-098-152 Comment noted.

now in question because of both the negative impact realized and the continuing cost of the regulation. Storm water retention with out permissible use and failure to use treatment effluent for recharge are two prime examples.

Continuation of O-098-152

Page 28 paragraph 6

A regional systems approach considers planning issues in a multidimensional, multidisciplinary manner ...." – if a regional approach is better than individual jurisdictions acting to their own primary interest, why not really investigate regional planning. IT is apparent that the I-5 corridor and the counties and jurisdictions along its length from Bellingham to Olympia have clear interrelationship for both population growth and economic development. It is reasonably easy to see this "corridor" developing to rival the Boston to Richmond corridor on the east coast. Going one step further, if regional is good why is statewide not better. We could save considerable expense in staffing and inter regional rivalry. Then perhaps we could move on to the even more effective "National planning" or even perhaps "world planning" with the UN in charge. The PSRC argument for regional planning does not stand up to close inspection. While some regional coordination for certain aspects of planning may be more effective it does not follow that all planning should be done regionally.

O-098-153

Page 29 Goals and Policies

Goal: The term "natural environment" is used without definition. Does the definition include the natural relationship of the sun and earth? Does the definition include the natural events related to plate tectonics? Does the definition include natural weather phenomena such as major storms with attendant flooding? Just what is it you want to safe guard and unless it is extremely limited, how would it be possible?

O-098-154

MPP-En-1 "region wide environmental strategies are not supported by GMA. The responsibility for such planning is assigned to counties and local jurisdictions including significant latitude to plan to satisfy local conditions.

O-098-155

MPP-En-2 see comment above.

MPP-En-3 The federal government and state have established standards for clean air and clean water. What part of GMA would suggest that moving beyond those standards is a part of the requirements under GMA. Where is the fiscal analysis for such action.

O-098-156

MPP-En-3 "ensure the health and wellbeing of people, animals, and plants" – the GMA requirement for this commitment is not understood. How this is to be accomplished and measured is not clear. There is no fiscal analysis for this policy.

O-098-157

MPP-En-3 "reduce the impacts of transportation on air quality and climate change" there is no mandate in GMA to address or deal with "climate change", a naturally occurring condition. Why is transportation singled out as the cause in this policy. 3 million people, all breathing, all have a significant impact on air quality. How is that impact to be addressed?

O-098-158

MPP-En-4 Ensure that all residents...live in a healthy environment" – how this is to be accomplished and the cost of achieving this goal are not indicated. If as in En-3 standards are to be ignored in favor of higher standards, how will this objective ever be met? This has a nice ring as social engineering but who made PSRC responsible for how individuals want to live? This policy also uses the term "minimum exposure." Exactly how is that quantified and how will the objective be certified for each and all residents?

O-098-159

O-098-153 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (see response to O-098-003). Also, VISION 2040 recognizes the importance of local planning, while also calling for coordination on issues that transcend local jurisdiction boundaries.

O-098-154 Comment noted.

O-098-155 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-156 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-157 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003). This policy is a revision of an existing policy.

O-098-158 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (see response to O-098-003). Also, see RCW 80.80.020.

O-098-159 The VISION contains policies and actions designed to carry it out. It is a vision to be worked towards and not a "blueprint" that identifies each action step.

MPP-En-6 this policy uses the term "best information available" in place of Best available science" as required by GMA. If the intent is to indicate that the policies must be fluid because there is doubt about the information being acted upon, then the policies should be limited to those supported by reliable information.

O-098-160

MPP-En-7 While noise mitigation may be desired in some areas, it has not been identified and documented as a region wide problem. The policy is open ended with the statement "other sources". There is no fiscal impact provided. There is no requirement in GMA for this action, as stated.

O-098-161

Page 29 Earth and Habitat

Page 29 paragraph 1

"The loss and degradation of terrestrial habitat threatens this biodiversity" – this is a generalized statement offered as fact without substantive evidence provided. To be of concern, the threat must be meaningful and, to be subject to the policies herein, the loss has the be human activity related. Is it safe to assume that another eruption of Mt. St. Helens would not be of concern while building a single family dwelling in any rural area would be considered a threat?

O-098-162

Note: It appears that despite all of the expressed fears and concerns about displacing wildlife by development, that wildlife adapts very well (in some cases , too well). In many instances, human encroachment has had little actual impact on the survival of local wildlife populations, but has caused modifications in eating habits. Of particular note, less than 5% of the land mass of the United States is actually developed. Wildlife may no longer thrive in downtown Seattle but is that where you want bears and cougars?

Page 30 paragraph 1

"critical areas, such as" the statement is too general to have any meaning when followed by the complete list of CA identified in GMA. Reword.

O-098-163

Page 30 paragraph 1

"and also protect us from flooding and other hazards" – if this were true we would not experience the normal annual flooding each year. In fact, our river systems are relatively young systems that are prone to migration and flooding. It is natural. The way to eliminate impact is to leave the demonstrated flood plain areas or build dikes and levies.

O-098-164

Page 30 paragraph 3

"Green spaces serve as the lungs for communities" - If your point is that green plants consume CO2 in the photo synthesis process why not say that. However, please note that all of the human created CO2 (and that created by wildlife) is not necessarily consumed by plants in the immediate vicinity. (Of course, the potential for this to be true in rural areas is much higher)

O-098-165

Page 30 paragraph 3

"to develop and open space and trail system that links…" – this is a significant departure from open space to preserve environment and habitat. Please provide the GMA reference that requires trails.

O-098-166

Page 30 paragraph 3

O-098-160 Comment noted. While similar, the first term is broader.

O-098-161 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-162 Comment noted. See the Issue Paper on Environmental Planning.

O-098-163 This idea was considered in the VISION 2040 process and the language was kept as written.

O-098-164 Comment noted.

O-098-165 VISION 2040 has been revised to address this issue.

O-098-166 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

"contributes to the regions visual identity" – this requires specific definition in the context of GMA. Most of the region citizens would identify Mt Rainier, the Olympic mountains, the cascades, the Space Needle, and ferries as our region visual image. Most of those are not subject to GMA requirements or regional oversight. O-098-167

Page 30 BOX

"GMA directs local governments to identify lands that are useful for public purposes" RCW 36.07A.150, not identified in the statement, provides very specific types of "public use" and links that use to public procurement. This section does not address open space. RCW 36.07A.160 does address open space as corridors between urban areas, recreation areas, trails and wildlife corridors. But to maintain control over the lands, the jurisdiction must acquire sufficient interest (read legally obtain ownership or control). Designation of "open space" does not automatically limit future use of the land or transfer rights of ownership and control to local government. O-098-168

Page 30 Goals and Policies

Goal: "preserve the beauty and ecological processes…. through conservation and enhancement" – this statement has no real meaning because the terms "beauty" and ecological processes" are subjective in nature. O-098-169

MMP-En-9 This policy provides review and comment oversight of County Policy documents to PSRC. Such authority is not granted in GMA or the constitution. O-098-170

MMP-En-10 "enhance habitat to prevent inclusion on the endangered species list" – this far exceeds the requirements of the GMA with respect to threatened and endangered species and species of local interest. To achieve this goal, all habitat would be subject to government action and control. There is no fiscal impact provided for this policy. The goal is fully subjective and has no realistic means of measuring success. O-098-171

MPP-En-11 This policy would cover "wildlife corridors in all areas and place them under government control. Those "corridors" are generally private property and protected by our Constitution from such action. O-098-172

MPP-En-12 The restoration of native vegetation exceeds the requirements of GMA and the realistic ability of satisfactory completion. Private property owners who have made major investments landscaping their properties will not willingly replace that landscaping with native plants. How would this policy be carried out in central Seattle? Would building be eliminated to "restore" native plants? O-098-173

MPP-EN-13 Climate change impacts are natural processes. the policy as stated is totally subjective and without meaning. For example, on rainy, snowy years we have more water. When it does not rain as much we do not have as much water. We should store more water from rainy years for use in dry years. That short analysis satisfies the policy. Is that what the drafters had in mind? There is no fiscal impact for this policy although it has the potential to break the bank. Further, this policy is not a requirement of GMA.

Note: if there is an overarching need to restore natural hydrological conditions, why not start with restoring Lake Washington to its natural level. That would eliminate the need for Ballard Locks and certainly restore original salmon habitat. After Lake Washington, the Seattle waterfront could be restored to it's natural state. O-098-174

Page 31 Water Quality

Page 31 First Box

9/6/2007

O-098-167 Comment noted.

O-098-168 Concur.

O-098-169 Comment noted.

O-098-170 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-171 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-172 Do not concur. VISION 2040 does not have the authority suggested in your comment.

O-098-173 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-174 Do not concur.

The statements in the box, while nice revisionist history, are not fully pertinent to the development of policies. The native Americans (tribes) migrated here from elsewhere because the local habitat provided better for their lives as hunter gatherers. They did little or nothing to enhance the environment. They used the natural resources for their own benefit as did those who followed. The tribal treaties and the Bolt decision do not pass control of water or land other than tribal lands to the tribes. The Bolt decision deals with fisheries catch but does not extend any role to the tribes regarding general land use decisions. To grant power and authority to the tribes or any other jurisdiction that is not rightfully theirs is contrary to the protections of our Constitution.

Page 31 paragraph 2

"Clean and reliable water is also obviously important for human health and well-being too". – this statement almost seems to be a drafter afterthought. Just to get things in proper priority, humans come first as a primary concern of our government.

Page 31 paragraph 3

The entire paragraph is a litany of the bad acts of humanity. Is there any chance that perhaps some of the "damage" was from natural causes? Perhaps streams through undeveloped areas caused erosion of their own banks which in turn allowed sediment to naturally enter streams. Perhaps storm wave action in shallow areas of the Sound modified bottom conditions. Perhaps wind storms felled trees that blocked flows or permitted accelerated erosion of land areas. Perhaps lightning caused forest fires removed ground cover that resulted in loss of soils. Perhaps earthquakes created new flow paths for steams and rivers. Perhaps spring flooding caused rivers to seek and create new channels. Perhaps river carried sediment was deposited along the flow path and at the mouth to create marshes that were subsequently destroyed by later river flow. Perhaps considering the entire history of the land may not lead to the desired action plan but it would be more honest.

Page 31 paragraph 3

"one third of Puget Sounds shorelines have been modified" – it is not clear why this statement is provided. There is no statement of specific harm by "modifications". More realistically, all Puget Sound shorelines have been modified over the past one hundred years by natural activity. What exactly is the point being made and where is the evidence to substantiate that point?

Page 31 BOX Shared Strategy

While the Strategy may intend to "engage local citizens" it does little more than provide support for environment activists and provides a cover for their activities. It would be a safe bet to offer that virtually no citizens of Puget Sound know what SS is or how it impacts them. They are probably equally uninformed as to how the document was g created.

The East Kitsap appendix of Shared Strategy, in some 70 pages of highly technical discussion finally reaches the conclusion that there are no streams in east Kitsap that have indigenous populations of salmon or other fish listed as threatened or endangered. The near-shore habitat studies conducted by Kitsap County do not include a survey of the actual near-shore environment to 10 fathoms so no real data exists with regard to shoreline habitat. Just what science will be used to determine compliance and success of these policies?

Page 31 Puget Sound Partnership

The most important step in the effective performance of the Partnership is not included in the work plan. There is no mention of first specifically defining and prioritizing the problems to be addressed and resolved. Two major problems, Victoria sewage dumping and local jurisdiction sewage system failures, should have top priority. There is no way to "clean up" Puget Sound if sewage is allowed to continuously enter the waters. This cannot be the only problem but none are defined or quantified. The

(Comment continues on following page)

O-098-175 Comment noted.

O-098-176 VISION 2040 has been revised to address this issue.

O-098-177 VISION 2040 is not intended to imply that all acts of people are damaging, nor attempts to identify all sources of environmental damage.

O-098-178 Comment noted. Text provides important background information.

O-098-179 VISION 2040 has been revised to address this issue.

O-098-180 Comment noted.

Partnership plan appears to be little more than an open ended access to public funding for environment activists.

Page 31 BOX WRIA

Of note, the WRIA 15 Plan, covering Kitsap county and some other areas, was not approved and does not exist as an action plan. The plan prepared by the WRIA 15 working group was vetoed by the tribes over control of water issues. The PSRC drafters also failed to identify that, through the initial step of the WRIA process, a reliable inventory of water quantity and storage was to be prepared for all WRIA.

Page 32 Goals and policies

Goal: "meet or exceed standards for water quality." – not a requirement of GMA or any other legislative action. Federal and state standards are established and should be followed. Since there is no qualitative measure provided for "exceed" the measurement is subjective and not appropriate.

Goal: "The quality of water flowing out of the region – including Puget Sound – should be as good as or better than the water quality entering the region." – there is no basis for this in either GMA or any other legislative directive. How this is to be accomplished and at what cost is not clear/ Does this include extensive monitoring of all possible entrances and exits for Puget Sound as well as monitoring all fresh water sources for the area? If our fresh water source is rain, and if that rain is essentially pure water with minor dust particulate matter, how will we meet the criteria established? What is the science that says that this is appropriate much less achievable? Why is this goal established?

MPP-En-14 Maintain natural hydrological functions …. restore them to a more natural state" – this policy is directly contrary to the goal. In the natural hydrological function water will be exposed to a dissolve minerals and organic substances, change temperature, and perhaps decrease in volume. The requirement to "restore" is contrary to GMA and as stated is fully subjective. This policy has no fiscal impact statement although it would require virtually unlimited funds to achieve. Effective use of the required water quality inventory under the WRIA effort should establish appropriate water inventory information to support monitoring of hydrological function.
MPP-En-14 "Restore … shorelines, watersheds, and estuaries to a natural condition…" – this policy exceeds the requirements of GMA and is fully subjective. "Natural condition" indicating a condition at a specific date/time is not provided. The "where appropriate and possible" proviso permits arbitrary application of the policy. It is doubtful that the shoreline of Lake Washington or Elliot Bay will be "restored" but certainly the shorelines of Bainbridge Island would be subject to "restoration". Because the majority of the shoreline under consideration is private property the cost to acquire the lands would be prohibitive so only regulatory direction ("Taking") would be required. The concept of "watersheds" has now grown to include all surface area of the state. To "restore" watershed to their natural condition would require the exit of all human presence. Is that what the PSRC drafters had in mind? Perhaps they envisioned "selected application" of the policy so that only some humans would be displaced. Is this another method to restrict growth and development in all rural areas?

MPP-En-15 "Reduce the use of pesticides and chemical fertilizers.." this is not a requirement of GMA. The citizens of the state are not responsible to carry out the policies of the Nature Conservancy or the Sierra Club. The material identified are tested and approved for use by the EPA. Political dislike of there use is not reason to regulate against them. Of note, the American agricultural industry, the most productive and efficient in the world, feeding a great part of the world relies on the safe and controlled use of allowed chemicals. Likewise the state, counties and local jurisdictions rely on chemical substances for control of noxious and invasive plant species. If "reduction" is the point of the policy, what is the baseline and what is the level to be achieved? As stated the policy is fully subjective and cannot be effectively implemented.

Page 32 Air Quality

Continuation of O-098-180

O-098-181

O-098-182

O-098-183

O-098-184

O-098-185

O-098-186

O-098-181 Comment noted.

O-098-182 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-183 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-184 Do not concur.

O-098-185 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-186 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

Page 32 paragraph 1 "Air quality is primarily a public health concern.." – the quality of air is controlled through standards established by federal and state law. Those standards are not subject to adjustment or revision under GMA.

Continuing in the paragraph is a listing of the "pollutants" of primary concern. Not identified, because it is frequently not listed in greenhouse gas inventory is water vapor which facilitates the incorporation of most pollutants but also controls the release of those pollutants.

The statement about impaired visibility has no supporting or explanatory information. If the concern is that in fog conditions visibility is impaired does that come as a surprise? Other than very infrequent periods of atmospheric temperature inversion, a natural occurrence, concentration of dust particles impacting visibility are not common. Exactly what is the point of this statement?

The statement concerning unidentified "toxic emissions" being problematic is itself problematic. Exactly what toxins are included and what is the source? Do those toxins exceed standard acceptable levels established by law? How are the toxins measured and do those measurements actually reflect general conditions or do they reflect known areas of toxin concentration? What is the meaning of "problematic" as used in this sentence?

Environmental and health experts are increasingly concerned …. May contribute to cancer and cardiovascular disease" – no source is cited and no specific concerns are identified. Is the concern that current federal and state standards are not appropriate? It should be noted that environmental and health experts are paid to be concerned. If funding were not available for them to develop their concern, would they be as involved and as they are? What does "concerned" mean and how does that translate to definitive action? What is the scientific evidence that air that meets current quality standards poses a health risk? Is this not just another "the sky is falling" statement?

Page 32 BOX Transportation and air quality

The box would indicate that concentrating residential areas around transportation corridors is not healthy. Why then, do the policies in this document stress the concentration of residential and commercial/industrial areas around transportation corridors? Is there a disconnect? Perhaps the idea follows the standard airport planning model. First build the airport then surround the airport with homes. Then the home owners complain about airport noise and force costly
noise mitigation measures on the airport. Perhaps in this case the concept is to concentrate population around corridors, declare the corridors a health hazard and then mitigate by forcing public transit as the "correct" answer. Policies should not require actions and then declare the results of those actions as problems.

Page 32 paragraph 2

"Development can effect air quality by changing the physical environment".- perhaps one of the most meaningless statements in this entire document. Any action either natural or taken by a life form can affect air quality by changing the physical environment. Development is not bad and it is inappropriate for this document to describe development in a negative manner. If it were not for development, we would not be here.

Page 32 paragraph 2

"Removing natural vegetation for development changes the local ambient temperature and results in more carbon in the atmosphere, thereby contributing to climate change." – this statement offers no scientific evidence for the claims and provides no specific concerning the conditions established. While the urbanization of areas certainly creates "heat islands" that alter local ambient temperatures, the same is not true for all development. Since the policies of this document would force continued urbanization and more dense population concentration in urban areas, it follow that the policies would

(Comment continues on following page)

O-098-187

O-098-188

O-098-189

O-098-190

O-098-191

O-098-192

O-098-193

O-098-187 Do not concur. See WAC 173-420-080.

O-098-188 Comment noted.

O-098-189 See EIS for more explanation of air toxics.

O-098-190 Comment noted. See the Issue Paper on Health.

O-098-191 Do not concur. The statement in the box says that the air quality issues need to be recognized and addressed.

O-098-192 Comment noted.

O-098-193 Comment noted. See the Puget Sound Clean Air Agency website (pscleanair.org).

favor the climate changes attendant to such growth. This statement would make it appear otherwise. Policy makers cannot have it both ways. With respect to the issue of atmospheric carbon and climate change, that association is not scientifically supportable. In fact, historic evidence indicates that increases in atmospheric CO2 lag global temperature increases. Please provide the specific scientific reference for the claims made.

Page 32 paragraph 2

"motor vehicles are by far the largest source of air pollution in the region" – this statement requires specific definition of air pollution and what the specific impact of motor vehicles is? Does motor vehicles include marine vessels and aircraft? Is the current air quality including the contribution by motor vehicles not in compliance with federal and state standards? Are all motor vehicles contributing equally to this "problem" and is there a current methodology to isolate "offenders" and bring them into compliance? What is a reasonable solution to the problem that can be achieved within the 30 year window and within the technology actually available and within realistic cost limitations?

Page 32 BOX GMA and air quality

Interesting approach to bring the Clean air agency in as some sort of controlling agency on growth. Please provide the GMA reference that extends such authority to the agency. While it is understood that local jurisdictions must comply with agency directives on air quality (meeting the established standards) it is not clear what direct involvement in land use planning the agency has under law.

One of the "policies" adopted by the agency is to "Support environmental justice". That phrase is not evident in GMA or any other legislation pertinent to this subject. There is no definition provided and the meaning is unknown. There is no Constitutional provision for "environmental justice". Please explain this policy in detail and then explain why it has any part in this document.

Page 33 Goals and Policies

Goal: The quality of air issue should be stated in reference to state and federal clean air standards and achievement of those standards. :Better …then… today" is a meaningless goal because "better" has no measurable values and "today" is not a date certain on which to base any difference in quality.

MPP-En-17 A policy requiring performance to exceed existing standards is not appropriate because standards are established and agreed to for a specific purpose. "Better" than standards has no measurable quantities and id fully subjective. Also under this policy, CO is identified instead of CO2 and it is not clear for that designation.

MPP-En-18 See comments above about policies that disregard standards. Does greenhouse gasses include the all important water vapor and, if so, specifically what steps or methodologies will be taken to reduce water vapor content of our air?

MPP-En-19 While it is clear that the policy is specifically directed at eliminating the POV as a means of transportation, such a policy is directly contrary to the expressed desires of citizens. Is the point of the policy that "government knows best" or that federal and state grant funding for transportation only supports non-POV projects? Additionally, the policy is subjective in nature and has no means of measuring any meaningful impact on air quality. "Continue effort", a subjective directive, would clearly permit the expenditure of time and energy without any specific results. We do not have sufficient public or private funds to support any action that only requires a "continued effort" to be considered successful.

Page 33 paragraph 1

The data provided from PSCAA is interesting but of little or no meaningful value to the discussion other

(Comment continues on following page)

Continuation of O-098-193
O-098-194
O-098-195
O-098-196
O-098-197
O-098-198
O-098-199
O-098-200
O-098-201

O-098-194 Comment noted. See the Issue Paper on Environmental Planning and the Puget Sound Clean Air Agency website (pscleanair.org).

O-098-195 Comment noted. See WAC 173-420-080.

O-098-196 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003). VISION 2040 discusses environmental justice in the Introduction and in the Glossary.

O-098-197 Comment noted.

O-098-198 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003). CO is the correct reference.

O-098-199 VISION 2040 has been revised.

O-098-200 Do not concur. Policy is not intended to eliminate automobiles.

O-098-201 Comment noted.

than to attempt to demonize automobiles and trucks. Today fewer than 5 % of job commuters and even fewer persons requiring transportation not related to work, travel by some form of public transit. Even when using transit, there is a significant POV component with respect to moving between home and transit hubs. Virtually all good moved throughout the area are moved by ground transport (truck, rail, or marine vessel). All of the current common transportation providers are dependent on fossil fuel and create emissions related to combustion of hydrocarbons. While it may be politically correct to have a policy that condemns the internal combustion engine and the transportation equipment that uses the engine, the policy does not resolve the issues of (1) What do people want for transportation?, and (2) what will it actually take to provide an acceptable alternative? A policy that dictates and outcome without reasonable means of achievement is not a policy but an order.

Continuation of O-098-201

Page 33 paragraph 2

"Vision 2040 calls for us to prepare for the anticipated impacts of global warming on our region." – exactly what are the anticipated impacts, how were they determined and quantified, and what is the validity of the source data leading to the conclusions? If no action were taken or if any action taken did not modify the end results of "global warming on the region" what action would be contemplated by this policy. What is the anticipated cost of the actions contemplated and how will that cost be covered? If there is a natural occurrence or disaster that accelerates or decelerates the rate of global warming, how will this policy be responsive to such occurrence?

O-098-202

O-098-202 Comment noted. See Governor's Climate Change Challenge 2007 and RCW 80.80.020.

Page 33 paragraph 2

"maximize energy efficiency" – government has been working this issue since the early 1980,s through a number of innovative steps such as artificially increasing the cost of electrical power by limiting construction of power plants. Denying construction of hydroelectric projects and denying development of a viable nuclear power industry. The "all electric" homes which were the future of the Northwest in 1980 are now extremely expensive to maintain and are being converted to oil or gas heat. Use of combustion efficient wood or pellet stoves, encourages a few short years ago are now condemned as "air polluters". Even diesel engines in motor vehicles, heralded as the "green choice" less than 15 years ago are now no longer acceptable. Is the average citizen to accept that the same government operations that have failed so pointedly in the past will now be able to meet the future energy needs of the region and the world with wind generators, solar panels, and alternative fuels. The question should be asked – What energy sources would private industry develop if government involvement was removed? Once again the objective of maximize disregards established standards and supplants those standards with subjective language of intent rather than results.

O-098-203

O-098-203 Comment noted.

Page 33 paragraph 2

"improve the convenience and safety of non-polluting transportation modes like bicycling and walking, protect natural landscape and vegetation, and increase recycling to reduce waste" – The issue of transportation is not only convenience but choice. Just in case it was lost in discussion, fully one half of each year in the region we are blessed with an abundance of precipitation. Those are not optimum conditions for commuting by bike or walking. The presumption that bikes and walking are non polluting disregards the impacts of manufacturing the equipment and clothing required and the maintenance of the trails and pathways used. Of course the entire concept ignores the "will of the people" a concept apparently not of interest in this policy document. The issue of natural landscape and vegetation is directly contrary to the policies that "focus" population and job growth in urban centers. To achieve the overall densities indicated by the growth numbers identified, there will be little "natural left in the urban areas. If natural areas are preserved that will be accomplished only by increasing densities elsewhere. The issue of recycling remains of specific interest because, except in the case of certain items (aluminum cans and plastic garbage bags) the record for actually reusing discarded material is questionable. Perhaps a closer look at the actual need to recycle as opposed to using the energy stored in material efficiently would be more appropriate.

O-098-204

O-098-204 Comment noted. Biking and walking are presumed to have fewer impacts.

O-098-205

O-098-205 Comment noted.

O-098-206

O-098-206 Comment noted.

Page 33 CHART

The chart does not include a segment for the gas emissions created by humans and other wildlife in the area. Is it that the contribution is not significant or that it cannot be accurately determined?

O-098-207

O-098-207 Comment noted.

Page 33 BOX

While it is interesting that several cities may have made "commitments" to the Kyoto Protocols and UN policies, they are not part of state law and certainly not part of the GMA. Actual adopting of the Protocols and any UN policies is reserved to the federal government. The activities of individual counties and cities is not binding on any other jurisdiction and should not be the basis for policies herein.

O-098-208

O-098-208 Comment noted.

Page 34 BOX

I am sure the Governor was well meaning in the common initiative. However, I do not see that initiative acted on to become state law or incorporated into GMA. Further, GMA deals with growth management and is not omnibus cover for any and every environment policy that a jurisdiction may wish to invoke. The term "social justice" is not defined and not clearly understood. If this has something to do with equal protection under the law why, is it included in this document? If it has some other meaning, what is that meaning and how does it specifically relate to growth management?

O-098-209

O-098-209 Comment noted. See RCW 80.80.020.

Page 34 Goals and Policies

"The region will reduce its overall production of harmful elements that contribute to climate change" – There has been no specific quantification of the harm or potential harm created by the natural occurrence of climate variation. Without identification and quantification of that harm it will be most difficult to take action to prevent the harm. Does this policy cover natural occurrences such as volcanic eruption, earthquake, wind storm, excess of or lack of precipitation, forest fire and normal decay of organic materials? Does the policy cover only "elements" (having a specific scientific meaning) or "harmful" products in general?

O-098-210

O-098-210 VISION 2040 has been revised to address this issue.

MPP-En-20 "Reduce the rate of energy consumption use per capita.." – This relies on technologies not yet identified and acceptance of those technologies as safe and effective to achieve the objectives. How will the "reduction" be quantified and measured. What if new economic growth requires a higher level of energy consumption to produce more desirable results? If alternative forms of energy are either available or to be developed, why is rate of consumption on a per capita basis important? What is the economic and fiscal impact of this policy?

O-098-211

O-098-211 Do not concur.

MPP-En-21 "Pursue the development of energy management technology.." – this presumes that the market place is not already interested in energy management or that this is an effort best pursued in the region. It would appear that the PSRC and policy makers are not aware of the major efforts ongoing within industry to become more energy efficient (with outstanding results to date) or the private and public sector efforts ongoing to develop alternate energies and methodologies and processes to more efficiently employ existing energy resources. The rational for this policy, except as pertains to government bureaucracies is not evident.

O-098-212

O-098-212 Comment noted.

MPP-En-22 "Reduce greenhouse gasses by expanding the use of conservation and alternate energy sources" – this is a market driven process that needs no governmental intervention to be successful. The market forces more efficient operation to reduce cost and to reduce market price to the customer. Perhaps the policy would be more effective if it were directed toward third world nations that offset production efficiencies with extremely low labor costs. With respect to individual conservation, each individual is also desires to reduce consumption in order to preserve some portion of his available monetary resources for other needs or for discretionary spending. This policy will have no impact on

O-098-213

O-098-213 Comment noted.

(Comment continues on following page)

business or individuals unless it is supported by law that increases cost of energy, limits available use of energy or imposes use of alternate energy sources.

Continuation of O-098-213

MPP-En-23 "increasing the number of trees in urban portions of the region" – once again a policy that contradicts another policy. Urban areas are to be the focus of population and job growth. Rural areas are to become permanent in nature and only minimal development will be allowed. At some point, either the use of land to accommodate population densities or the nature of that development will make it increasingly difficult to have viable open space for "trees". The concern may be a bit inappropriate since with permanent rural areas, the potential for reforestation of vast portions of those areas does exist. There is no reasonable manner to create a CO2/O2 use/consumption balance between people and vegetation in a specific area. If the trees are for "perception of nature" purposes, why not go with manufactured trees as we use on the interior of buildings. Another consideration with trees is the maintenance of those trees and the unintended consequences of trees in high density areas.

O-098-214

O-098-214 Comment noted.

MPP-En-24 "Anticipate and address the impact of climate change on regional water sources" – once again, a policy that addresses a natural occurrence as if it were other and one that demands some unspecified actions. This policy, besides having little meaning is also fully subjective without means of defining success. It could be argued that the policy statement itself satisfies the policy requirement because it clearly "anticipates" something regarding climate.

O-098-215

O-098-215 Comment noted.

Page 34 Overview of environment actions and measures

Page 34 paragraph 1

The five "actions" identified in this paragraph would operate to establish PSRC as a "super authority" for all environmental issues or concerns in the region. In addition, the actions would create a new level of bureaucracy and control not required by GMA or authorized by our Constitution. Further, actions concerning "regional water quality issues", green space strategies, "regional air quality guide", "climate change action plan", county protection of critical areas, and assessment of local plans are not available as delegated authorities from individual jurisdictions to PSRC.

O-098-216

O-098-216 Do not concur.

Page 34 paragraph 2

The monitoring actions identified in this paragraph follow the action assignments of the previous paragraph and thus have no validity. Of note however, spending tax dollars to assess coordination between "environmental stakeholders" is without meaning and without merit. Those stakeholders are the owners and primary stewards of the property. They do not need to be "coordinated" or assessed. Identification in changes in land cover would duplicate effort already underway at the local and state level. Why would we waste money for that effort?
Designating "impaired" waters, whatever that means, is also the purview of local health districts and certainly does not need "regional" oversight. Measuring "unhealthy air days" is the business of PSCAA. Unless PSCAA is to be eliminated in favor of PSRC, this policy makes no sense. Of note, a review of Appendix 2 – Monitoring and Measures does not provide either the level of detail or the types of metrics and analysis appropriate to the policies contained herein. If Appendix 2 were to be provided as the data collection and analysis portion of a post graduate research study, it would be rejected without hesitation.

O-098-217

O-098-217 Comment noted. VISION 2040 has been revised to relocate the actions from the appendix into the respective policy sections.

Page 35 Land use, housing and orderly development

Goal: "Focused growth within already urbanized areas to create compact, transit oriented, pedestrian oriented communities…" – the GMA goal RCW 36.70A 210(1) is to "encourage development in urban areas..". This policy far exceeds that requirement and introduces aspects not a part of GMA . The policy can only be satisfied by a continuous increase in the densities of existing urban areas.

O-098-218

O-098-218 Do not concur. See RCW 36.70A and RCW 47.80.026.

"while maintaining the unique local character" – this portion of the policy is in direct conflict with the first part of the statement. It is not possible to continuously increase density and to "infill" an urban area to the maximum extent possible without destroying the original character of the community. The very policy that results in a major increase in the density of a community or a portion of a community will irreversibly alter the character of that area. Past practices using these same policies have rarely resulted in community stability an economic improvement over the long haul.

O-098-219 Comment noted.

"Centers will continue to be a focus of development" – Centers are a outcome of transportation policy and not individual county planning under GMA. The insistence on centers as the site for intensive growth does little more than focus on presumed transportation solutions. There is no evidence that concentrating population densities in or around transit corridors or hubs will result in significant increases in transit use or lower demands on other transportation choices. The actual history of attempts to force population into centers is that in time the people leave the centers for areas surrounding the centers. With that in mind, all of the cost and effort to concentrate transit services is nullified when population moves to the fringes of the service areas and remains dependent on POV as a significant part of their commute and as a mainstay for their non commute transportation.

O-098-220 Do not concur.

"Vital parts of the region will continue to be permanent rural lands.." this policy is a direct violation of GMA guidelines See RCW36.70A.011specifically regarding legislative findings on rural lands. Also see RCW 36.70A.030(16) which reads in part "Rural development can consist of a variety of uses and residential densities, including clustered residential development, at levels that are consistent with the preservation of rural character and the requirements of the rural element." It is clear that the policy does not conform to the GMA direction or intent. The only way to make this policy work would be to refuse development in rural areas; a regulatory taking.

O-098-221 Comment noted.

"All citizens of the region will have safe and affordable housing." – this policy is not achievable within reason. Government does not have the authority to provide housing for all citizens nor can government require that the private sector provide such housing. While there can be no doubt that housing is a basic survival need for every person, no individual has a "right" to housing. The cost of this policy has not been identified nor has the methodology for covering that cost. This policy of social engineering far exceeds the intent or requirements of GMA and the authority delegated to government by the citizens of the state.

O-098-222 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

Page 35 Paragraph 1

The first two sentences of this paragraph offer nothing of substance and certainly provide no insight to the reasons for the policies or evidence in substantiation of the policies. The sentences are little more than self serving prose .

O-098-223 Comment noted. The first two sentences have been deleted from VISION 2040.

Page 35 Paragraph 1

"Earlier in their history, the regions cities and towns were primarily places where jobs were close to home." – this was based on the fact that the only modes of land transportation available were horse, horse and carriage, or walking. The economic status of most residents did not support owning draft animals for transportation. To imply that towns and cities of the late 19th and early 20th century were, by clever design, pedestrian friendly, is to demonstrate little or know understanding of history.

O-098-224 Comment noted.

Page 35 paragraph 1

"Development patterns of the last half of the 20th century often separated people from jobs and overly focused on accommodating the automobile and altered critical ecosystems" – I question if there is anyone on the PSRC over the age of 50 or any individual who has bothered to actually study the history of the 20th century in America. The people of America suffered a major economic depression. In

O-098-225 Comment noted.

(Comment continues on following page)

response, major public works programs were initiated to employ the work force. Those programs pulled families from cities. The early days of the second world war, prior to US entry in the war, saw major development of war industries to support Brittan and the soviet Union in their fight against Germany. Those industries resulted in additional movement from cities to outlying areas. After the US joined the war, the major development of war industries could only take place outside of previously developed areas. Once again people were drawn away from cities to their work. At wars end, American industry, the only surviving industrial base in the world converted and expanded to become the supplier of consumer goods to America and the rest of the world. The men returning from overseas were hired into those industries and settled into communities that were created in the proximity of the industries. The economic drive of the day also made those workers major consumers with opportunities for leisure time and leisure recreational activities. The automotive industry found a ready market for their products. The automobile also effectively responded to what became a highly transient population and work force. The automobile was not a primary factor in development but did permit residential that satisfied the need of the people. Interestingly enough, that initial desire to live outside urban areas in a single family home with a nice yard and other amenities continues to rank very high (about 85 %) with Americans today. Not surprisingly, those same Americans, refer to the preferred style of living as "the American Dream" and not sprawl.

Continuation of O-098-225

Page 35 paragraph 1

"Then loss of land cover and vegetation to impervious surfaces, including buildings and pavement, also contributes to climate change" – for this statement to have any meaning the term "climate change must have a specific definition. In the united States there are more acres in forest today than 150 years ago. Less than 5% of the US land mass is developed. Intimating that the small land development of the region is a major factor in global climate change is not supported by fact.

O-098-226

O-098-226 Comment noted. VISION 2040 includes a definition of climate change and also identifies greenhouse gases.

Page 35 paragraph 1

"taken steps to once again build communities that are walkable" – this port needs explanation. Are there people in the region who desire to live in a walkable community who are being denied that opportunity? It is really that the community is not walkable or that they are unable to access all of the goods and services they desire by walking? Could they not walk further to meet their needs or have they established a walking limit? If the needs of those who desire to like in "walkable communities" and those needs were met by market forces, why are government policies necessary to satisfy future needs? If there is a significant number of people who desire to reside in walkable communities but are unable to do so, how will this policy solve their individual problems?

O-098-227

O-098-227 Comment noted. VISION 2040 promotes development that helps to allow housing and mobility choices.

Page 35 Regional approaches

Page 35 paragraph 1

"Create more vibrant communities, reduce reliance on the automobile, minimize growth in the region's rural areas and protect resource lands." – this approach could not be further from the desires of 85% of Americans. What is the proof that existing communities are not "vibrant", and how does increasing population density and infill increase "vibrancy". Understand that the issue is not reliance on the automobile but preference for the individual mobility and freedom offered by the automobile. There is mandate in GMA or elsewhere to severely restrict growth in rural areas and there is no clear down side to reasonable development in rural areas. Finally the protection of resource lands" appears to consider those lands as being within the public venue. They are not. Those lands are private property and the owners will do very nicely without the involvement and oversight of government.

O-098-228

O-098-228 Do not concur.

Page 35 paragraph 2

"building on the concept of creating mixed-use central places and vibrant communities connected by an

O-098-229

O-098-229 Comment noted. See also RCW 47.80.026.

(Comment continues on following page)

efficient transportation system" – once again we have the assumption that current communities are not "vibrant" and require government intervention to become so. The mixed-use development, so heavily restricted in the past but now the new poster child, occurs only sporadically with in fill or redevelopment of areas. In order to support that redevelopment requires the agreement of current land residents to give up current use, the agreement of developers to undertake the project, and a residential and business climate that supports both uses. There is nothing in this document that explaining how that is to occur or any indication of the time line for the process. This is a process of potential high private fiscal risk but there is no fiscal impact statement provided.

Page 35 paragraph 2

"providing a broad range of housing choices" – once again a statement that is contrary to policy. If high density and infill are the focus and small lot single family dwellings are the exception rather than the rule, does not government then decide what choices people can make. It is inappropriate to dictate a certain range of housing opportunities and than offer that people have freedom of choice. Choice is a function of market factors and the compromises that an individual is willing to make. Choice is not selecting from only those options provided by government.

Page 35 paragraph 3

"focusing development within areas that are already urbanized and by addressing locating jobs and housing in closer proximity" – Just a couple of problems:

1. GMA finds that encouraging is appropriate and does not support focusing.
2. In other sections the policies indicate focusing in "centers". What is the policy intent?
3. How will employers be convinced to locate their employment opportunities in the areas dictated by the policy? Most employers will be interested in qualified work force and affordable business location above all others. Major and minor industrial businesses will be more interested in locating in areas with room for expansion that are properly served by multimodal transport for goods. Where possible, businesses will choose to locate where there are fewest costly regulations and tax impacts. How will this be addressed? Where is the fiscal analysis for this part of the plan?
4. If housing is developed and employers do not collocate, how will that problem be resolved? If the concept includes transit between centers but does not provide for transportation to a number of diverse business locations, how will workers get to their jobs?

Page 35 paragraph 3

The housing section provides a comprehensive approach to making safe and decent housing available in the region" – a few problems here, also:

1. The overarching goal is that all citizens will have safe and affordable housing? Will the policies back away from that assurance?
2. The entire document to this point talks to affordable housing. What does "decent" mean? Does this indicate that affordability is not a primary consideration?
3. Haw will safety be assured throughout the region? It appears that as population increases and densities are increased, behavior problems are becoming more evident. What is the fiscal impact of providing safe housing for all?

Page 36 Paragraph 1

"land has significant importance for people" – the statement is almost correct but fails in the list of qualifiers. Land is the primary investment for most Americans and that investment represent their home. That is the "American Dream". Land and the home on it represents not only the security in their present lives but the legacy they will pass to their children. The land represents the sweat and effort of the owners and the risk they are enduring to achieve clear ownership. Private property belongs to the individuals who hold title to that land and not to the community in general or to the government.

9/6/2007

Continuation of O-098-229

O-098-230

O-098-231

O-098-232

O-098-233

O-098-230 Comment noted.

O-098-231 Comment noted. VISION 2040 promotes collaboration between jurisdictions, businesses, and others to achieve the vision.

O-098-232 The policies support the goal. See the Issue Paper on Housing.

O-098-233 Comment noted. VISION 2040 has been revised to address this issue.

Page 36 paragraph 1

"When there are changes in how land is used, those changes are typically long lasting. They can alter the sense of place people have come to value" – since the advent of zoning regulation and most certainly since the advent of GMA in 1990, "changes in how land is used" are controlled specifically by government. Property owners are understandably not pleased when government action restricts their enjoyment of use, control, or disposition of property: rights guaranteed by our Constitution. Unfortunately, it is more frequent that those who do not own a property and who have no vested interest in a property are the ones who object to the altered "sense of place". Unfortunately for them, "sense of place" is not a constitutionally protected right and any policy that would act to the good of non owners at the unjustified cost to the owner is not acceptable and contrary to law.

O-098-234

O-098-234 Comment noted.

Page 36 paragraph 5

"Timber harvesting has been a mainstay of the region's economy for more than century – providing jobs, economic opportunity, and recreation." – that may have been true in the 1980"s but since then, because of land use regulation and "environmental" concerns, the actual timber industry has been in decline. A look at the rail traffic from British Columbia will reveal near continuous loads of lumber and other timber products being imported from Canada. Through government regulation we have all but killed an industry that efficiently used a major natural resource. Of interest, the decline of the lumber industry has also impacted funding available from state resource lands to pay for education, a primary responsibility of state government.

O-098-235

O-098-235 Comment noted.

Page 36 paragraph 6

"forest ecosystems are in danger of becoming severely stressed by a combination of climate triggered-heat and insect damage, public overuse, and fire susceptibility" – what is the scientific basis for any of these claims? If the forests in question are public, why is government not taking appropriate corrective action? Why is it that, in other areas where timber industries remain active, private owners properly manage their forest resources? Just which "insect" damage has been triggered by climate variation and what is the history of the insect presence in the state?

O-098-236

O-098-236 Comment noted. VISION 2040, among other purposes, is seeking to take the appropriate actions. Also, see the Cascade Land Conservancy website (cascadeland.org) and the Puget Sound Clean Air Agency website (pscleanair.org) for more information on these issues.

Page 36 paragraph 7

"among the most productive in the state" – is this based on factual data that clearly indicates that the agricultural industry of eastern Washington is not as productive as that of western Washington? Equally important does this address agricultural production inside the region? If not why is significant to this document?

O-098-237

O-098-237 Comment noted.

Page 36 Paragraph 7

"When the region loses farmland , its residents must rely on food from more distant locations" – this statement appears to support the belief that the region has a reasonable degree of self sufficiency in food production. Exactly what is the regions food productions in tons per year of individual products? What is the regions demand, in tons per year, for individual food products? What key agricultural products are not produced in the region but consumed here? What percentage of the regions food supply is imported from outside the region? Are we over stating the significance of farmland as food producers?

O-098-238

O-098-238 Regional food production is an important issue. See cascadeharvest.org and other related websites for additional information.

Page 36 paragraph 9

"mines contain non renewable resources" – only true in the strictest sense. Access to mineral sources

O-098-239

O-098-239 Comment noted.

(Comment continues on following page)

are being created continuously by earth plate motion and other geologic events. In some cases, becoming more frequent over time, the minerals extracted from the ground when refined and used may be reused many times so the use of those minerals is not lost.

"today's mining primarily focuses on aggregates such as crushed sand and gravel" – better said as are virtually limited to sand and gravel pits.

Page 37 Goals and policies
Goal: " conserve it's natural resource lands permanently" – those lands are private property. If they are to be subject to some status imposed by government is that not a regulatory taking. Forest lands should be allowed to be harvested and depleted mineral lands should be available for development. To achieve this goal, government will have to acquire land but there is no provision for that and no fiscal impact provided.

MPP-DP-1 Protect and enhance …" This policy incorrectly applies GMA guidance. GMA (RCW 36.07A.020) calls to maintain and enhance natural resource industries and to retain open space and enhance recreational opportunities.

MPP-DP-3 "Support the sustainability of designated resource lands" – this not a GMA goal or requirement and it is not clear how this can be accomplished. Mineral lands will be depleted through use. To sustain mineral lands use must be restricted or prohibited which is contrary to GMA guidance to enhance those industries. If farming becomes economically non-viable, will the land have to remain agricultural lands. How will "sustainability be achieved? Is government intervention and incentive a part of the policy and if so at what level and what cost? Where is the fiscal impact to both the public and private sector for this policy?

MMP-DP-4 and MMP-DP-5 The wording difference between these policy statements is interesting. DP-4 seems to protect natural resource industries from encroachment but DP-5 addresses only the physical land itself. It is not clear under DP-5 how resource lands could possibly impact adjacent lands. It is not clear how these policies will be implemented and at what cost.

Page 37 Urban lands

Page 37 paragraph 1

"regions earliest cities developed with a mix of uses and in a manner that supported walking to key destinations and activities" – this not surprising condition did not result from government planning or regulation but from the reality that walking was the primary mode of transportation of the day. Additionally, business owners found it more realistic to collocate with their business than to build a separate home. To now cite the condition totally out of historical context and reason as a basis for government intervention today is inappropriate. If this historical "compact form" was so desirable, why did it not continue through to today. It is interesting to note that even US east coast cities with a much longer history than our region began to shift away from the "compact form" long before this region was settled.

Page 37 paragraph 2

The contents of the paragraph are revisionist history that does not add anything to the discussion and clearly makes the basis for the policies resultant from the discussion highly suspect.

Page 37 paragraph 2

"Wide streets with infrequent crosswalks and shopping malls surrounded by parking lots were designed to accommodate cars, not people" – wrong once again. In most commercial development areas street size was based on standard city block length with crosswalk at the corners. Malls were developed as

(Comment continues on following page)

Continuation of O-098-239

O-098-240

O-098-241

O-098-242

O-098-243

O-098-244

O-098-245

O-098-246

O-098-240 Comment noted.

O-098-241 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003). This is a revision to an existing policy adopted in the 1995 VISION 2020.

O-098-242 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003). This is a revision to an existing policy adopted in the 1995 VISION 2020.

O-098-243 VISION 2040 has been revised.

O-098-244 VISION 2040 seeks to address the conditions that negatively affect people's ability to walk to destinations.

O-098-245 Do not concur.

O-098-246 Comment noted.

commercially beneficial to both business and people because the clustering of good and services made shopping more efficient and reduced cost to business for customer exposure. Malls are the product of what people wanted. Cars are tools which people use to improve their lives. The designs noted were for the benefit of people. If that were not the case they would have failed long ago.

Continuation of O-098-246

Page 37 paragraph 2

"This pattern has not supported walking, bicycling, or use of transit to meet daily needs leading to the overburdening of our present highway system and loss of regional mobility" – walking is still am major element in satisfying daily needs, only now that walking is done inside clean, safe, dry, efficient malls. Bicycling has never been a primary means of transportation in the US and just because it may be prominent in some resort areas or in Europe does not mean that it meets the needs or desires of Americans. In those metropolitan areas where effective and efficient public transit service is available, it is used. However, to be a service of choice it must be more cost effective and time effective than other alternatives and must actually provide transport between origin and destination. The "overburdened highways" are probably more the direct result of failure to construct necessary highway road miles while concentrating on development of public transit. Of note, our Constitution, in Article 2 section 40, specifically identifies the uses permissible for tax dollars collected for highway funds. Public transit is not one of the uses authorized.

O-098-247

O-098-247 Comment noted.

Page 37 paragraph 2

"Among the primary provisions of the GMA are goals to reduce sprawling and low density developments, to ensure that growth occurs in areas designated for urban land uses, to preserve rural lands and conserve natural resources and to enable the efficient provision of services and facilities" – this is a significant reworking of the GMA goals and the spirit and intent of GMA. GMA actually says:

" *Encourage* development in urban areas ***where adequate public facilities and services exist or can be provided in an efficient manner.***"

"***Reduce*** the ***inappropriate conversion of undeveloped land*** into sprawling, low density development."

"***Maintain and enhance natural resource industries***"

"Ensure that those public facilities and services ***necessary to support development*** shall be adequate the development at the time the development is available for occupancy and use without decreasing the current service levels below locally established minimum standards."

Of note, there is no mention of the goal dealing with Property rights, a major item of interest in development.

O-098-248

O-098-248 VISION 2040 has been revised to address this issue.

Page 37 paragraph 3

"In order to provide adequate services and housing, and maintain economic health, we need to change the way we accommodate growth." – GMA has been a reality for over 15 years and implemented in all counties of the region for over 10 years. If the development practices initiated under GMA are not achieving the goals of GMA it might be more appropriate to examine the goals. More stringent execution of failed policies will not result in a more favorable out come. If the only housing opportunities available to citizens are in high density urban areas, and the only locations available for businesses are in areas that do not meet their basic business plan needs, neither will move into those areas.

O-098-249

O-098-249 Comment noted.

Page 37 paragraph 4

"existing urban growth area designations can accommodate the population and employment growth expected by 2040." – there is no validity to this statement and it is contrary to existing policies. Current UGA boundaries are established based on adopted growth projections sooner than 2040. The UGA are based on achievement of "established" urban densities including infill projections. In almost all cases, to satisfy the ability to accommodate the population projections, development must be vertical. To assume that the additional population and employment growth through 204 will fit in these same areas defies reason. The only way that can be accomplished is with more drastic vertical development and greater conversion and infill. Those practices will, in themselves, destroy the character of the communities into which growth is being assimilated. O-098-250

Page 37 paragraph 5

"Vision 2040 establishes a regional framework for future adjustments to the urban growth area." – GMA provides a clear process for UGA boundary definition and adjustment. There is n need for a regional methodology. The city of Seattle need not be concerned with how Kitsap County and its cities achieve boundary decisions. O-098-251

Page 37 paragraph 5

"provides the opportunity for PSRC and the counties to collaborate on future adjustments" – There is no recognized authority for PSRC to be involved in processes or decisions that are entirely within the borders and jurisdictions of any county or its cities. There is no identified need for "collaboration" with or PSRC oversight of county processes. O-098-252

Page 39 paragraph 1

"Counties and cities work cooperatively with tribal governments in their targeting processes" – this exceeds the requirements of GMA and establishes a burden for counties and cities not supported by law. RCW 36.07A.210(4) states: Federal agencies and Indian tribes may participate in and cooperate with the county wide planning policy adoption process." There is no requirement for the tribes to participate in the growth distribution process. The tribes are not subject to or required to accept any growth distribution and have no reason to participate in the process. O-098-253

Page 39 Goals and policies

Goal: "prevent urbanization of rural lands" – this not what GMA says and does not reflect the meaning of the GMA goals. Refer to the wording of RCW 36.70A.070(5). O-098-254

MPP-DP-6 The need for a regional framework to complete UGA boundary establishment is not understood. GMA provides the necessary guidance and assigns that responsibility to the appropriate cities and counties. O-098-255

MPP-DP-7 Under GMA, OFM provides growth projections to counties. Counties and the cities of the county are then responsible to accommodate the growth. There is no need for a "regional" policy to guide the county-city processes. There is nothing in GMA that would suggest that counties are subordinated to a region for growth distributions. O-098-256

MPP-DP-8 "first and foremost in UGA" – this is not a GMA requirement. The GMA goal is to encourage not force or focus. The decisions on growth distributions are the responsibility of the county an d cities and not other jurisdictions in the region. O-098-257

Page 39 Urban regional geographies and their centers

Page 39 paragraph 1

O-098-250 VISION 2040 has been revised to address this issue. The discussion in Part II: Regional Growth Strategy was edited to clarify that the analysis assumes no substantive increase in the UGA. Decisions on UGA expansions will be made by counties based on, among other items, buildable lands analyses.

O-098-251 Do not concur.

O-098-252 Do not concur.

O-098-253 Comment noted. VISION 2040 merely states what happens through countywide policies and does not include any requirement as the comment seems to suggest.

O-098-254 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-255 This is a revision of an existing policy. See RCW 36.70A.110 (1).

O-098-256 Comment noted.

O-098-257 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003). It is a revision of an existing policy.

"Centers" are not recognized in GMA as a development concept. The "center" concept is a regional transportation concept that services to justify the continued development of public transit services. To openly incorporate the centers concept into the policies under the guise as being part of the GMA process is both inappropriate and lacking in good faith. The ability of PSRC to exercise derivative regulation development by combining disassociated elements of various programs and by reinterpreting the word, spirit, and intent of GMA is not appropriate. O-098-258

Page 39 paragraph 2

"Centers create environments of improved accessibility and mobility- especially for walking, biking, and transit- and as a result play a key transportation role as well" – this is an assumption stated as fact. There is no substantive evidence that walking, biking, or public transit play a major role in the transportation needs of the region. To the contrary, the low percentage of transportation use accommodated by those modes questions the continued dedication of significant funding to them. If the objective is to eventually create a set of conditions in which walking, biking, and public transit are the modes of choice because they are the only modes available that effort will fail. What is the fiscal impact of implementing this transportation centered development policy? O-098-259

Page 39 paragraph 5

"strategy seeks to focus a major share of employment and housing growth in cities with metropolitan and core centers" – once again, the GMA goal is encourage growth in UGA. O-098-260

Page 40 Paragraph 1

"such access includes bicycle and pedestrian connections as well as reliable transit service" – it is clear that the actual objective of the policies is to eliminate the use of POV throughout the region. That is not a GMA goal and is not consistent with the stated desires of region citizens. What is the basis for this policy decision? What is the fiscal impact to the public sector to implement this policy and the private sector to have to live with it? O-098-261

Page 41 Table

Under regional growth centers, PSRC retains the authority to designate Metropolitan City Centers and Core City Centers. That authority is derived from PSRC role as a RTO and not a land use authority. To impose an authority assigned for one purpose to exercise control over another process is inappropriate. This continued reliance of RTO authority to control growth management is totally inappropriate. In essence, PSRC has, in addition to elevating environmental issues to a primary consideration above all other GMA goals, not elevated its RTO role as a basis to make transportation a primary consideration above all other GMA goals. This manipulation of limited authority is not consistent with the spirit and intent of GMA and is not supported by the provisions of our Constitution. O-098-262

Page 43 Goals and policies

Goal: The region will direct growth and development to a limited number of designated regional growth centers. – totally inconsistent with GMA goals and requirements. This policy extends to PSRC legislative authority not supported in GMA or the Constitution. O-098-263

MPP-DP-9 - totally inconsistent with GMA goals and requirements. This policy extends to PSRC legislative authority not supported in GMA or the Constitution. O-098-264

MPP-DP-10 totally inconsistent with GMA goals and requirements. This policy extends to PSRC legislative authority not supported in GMA or the Constitution. O-098-265

Response to Comment Letter

O-098-258 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-259 Do not concur. See VISION 2040 Issue Papers on Subregional Centers and Transportation.

O-098-260 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-261 Comment noted. The policies do not propose to eliminate automobiles. See the Transportation section and the 2007 Destination 2030 update.

O-098-262 Comment noted.

O-098-263 Comment noted. This is a continuation of regional policy established in 1990.

O-098-264 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003). This is a revision of an existing policy adopted in the 1995 VISION 2020.

O-098-265 Do not concur.

MPP-DP-11 "Give funding priority…" In it's RTO role PSRC was extended the authority to identify transportation projects for federal and state funding. Most citizens would assume that the funding decisions would be based on best bang for our buck. It is apparent that PSRC actually intends to use the funding availability as a coercive whip to force compliance with the policies of this document. The end result can only be continued transportation and economic hardship for the area and a growth process that will fail over time.

O-098-266

Goal: "Secondary centers….. will promote pedestrian connections and support transit oriented uses." Not consistent with either the development goals or the transportation goals of GMA.

O-098-267

MPP-DP-15 - the need for centers is not clear if UGA are to be annexed or incorporate. What specific advantages to "centers" offer over UGA or cities? What is the legal jurisdictional authority of a center? If centers are so important to growth management, why are they not part of GMA?

O-098-268

MPP-DP-16 - the need for centers is not clear if UGA are to be annexed or incorporate. What specific advantages to "centers" offer over UGA or cities? What is the legal jurisdictional authority of a center? If centers are so important to growth management, why are they not part of GMA?

MPP-DP-17 - In it's RTO role PSRC was extended the authority to identify transportation projects for federal and state funding. Most citizens would assume that the funding decisions would be based on best bang for our buck. It is apparent that PSRC actually intends to use the funding availability as a coercive whip to force compliance with the policies of this document. The end result can only be continued transportation and economic hardship for the area and a growth process that will fail over time.

Continuation of O-098-266

Goal "support viable regional manufacturing/industrial centers… " – The need to control the location of economic growth on a regional level is not clear. Businesses tend to locate where the business climate is best for them. Considerations such as skilled labor base, community amenities, transportation access appropriate to the business, and access to needed raw material resources are business considerations. History in out region has clearly demonstrated that when business is being forced or coerced into a location they will either require major funding (read tax) incentive programs or they will go elsewhere. What is wrong with a policy that develops a business friendly environment and works with business to establish that business within the region. Since GMA already assigns that responsibility to counties, it may be best left to the individual counties.

O-098-269

MPP-DP-12 The policy to "focus" economic growth is not preceded with a policy to prepare for that growth by properly developing Industrial/manufacturing/business centers with necessary infrastructure. Regional history indicates that the burden of infrastructure development is placed on the first business to try development in an designed area or major tax incentives are offered to lure the business to the area. The fiscal impact of the policy as stated is not provided not is there any indication of how that impact will be satisfied.

O-098-270

MPP-DP-13 There is no clear need for a regional framework for designating areas. A more important need is a methodology for achieving regional mutual support for a county that has been successful in encouraging a business to locate in that county. There should exist a friendly competition among counties with reasonable understanding of the interdependence on each other for certain business needs. There is no clear reason for a county to suborn its authority or responsibilities to a regional policy.

O-098-271

MPP-DP-14 In it's economic development role PSRC was extended the very limited authority to identify economic development opportunities for federal and state funding. It is not clear that the authority extends to deciding where economic development must occur. Most citizens would assume that the funding decisions would be based on best bang for our buck. It is apparent that PSRC actually intends to use the funding availability as a coercive whip to force compliance with the policies of this document. The end result can only be continued economic development hardship for the area and a

O-098-272

O-098-266 Comment noted. This policy is based on several existing policies adopted in the 1995 VISION 2020.

O-098-267 Do not concur. See RCW 47.80.026.

O-098-268 See VISION 2040 Issue Paper on Centers for background research on the benefits of centers.

O-098-266 (continued) See initial response to this comment.

O-098-269 Comment noted.

O-098-270 Comment noted.

O-098-271 Comment noted. VISION 2040 has been revised to address this issue.

O-098-272 Comment noted.

growth process that will fail over time.

Page 44 paragraph 1

"Compact urban communities are locations which offer transportation, housing and shopping choices that reduce the need for automobile travel and allow residents to walk or bicycle to neighborhood stores." – this distinction and definition is not included in GMA. Where did this come from and how did it become a significant planning item. Nothing in GMA intimates the adversity to POV use demonstrated in this definition. Please provide specific examples of these communities as existing in each of the regions counties and identify the numbers of population so served. O-098-273

Page 44 paragraph 1

"streets are laid out in a grid pattern rather than cul-de-sacs, supporting efficient transit operations" – this would eliminate most of the communities and UGA in the region. The intimation that gird pattern streets enhances transit operation would appear to indicate that transit movers would the cover individual streets. In fact, transit facilities are normally located on major arterials and it is up to the commuter/user to get to transit stops from the point of origin by whatever means may be appropriate. The term "park-and-ride" gives some indication of the reliance on POV for that mode of transit. O-098-274

Page 44 paragraph 2

"Vision 2040 calls for preservation of these communities" – another unexplained variation from GMA. RCW 36.70A.070(2) uses the terminology "ensuring the vitality and character of established residential neighborhoods". It is not clear how the aggressive policies of Vision 2040 will meet that requirement. O-098-275

Page 44 paragraph 2

"supports communities that currently have those qualities" – who determines the qualities of a community? What happens if it is determined that a community does not have the "desired" qualities? O-098-276

Page 44 Paragraph 1

" Vision 2040 also supports redevelopment of selected low- density commercial corridors to make them more transit oriented and pedestrian friendly" – it is not clear if this is inside or outside UGA. Where in GMA is this activity covered. It is not clear if the intent is to decrease commercial activity, increase housing density or both. What is the actual intent of this statement? O-098-277

Page 44 Policies

MPP-DP-18 What is the GMA requirement for this policy that would reinvent our local communities. Where in GMA are we required to subordinate our panning and land use determinations to walking, bicycling or public transit? What is the definition of a "vibrant sustainable compact urban community? Who created the definition? How are we to be sure that this is what citizens really want? What do citizens who do not want to live in these communities do? O-098-278

MMP-DP-19 This policy appears to be directly contrary to MMP-DP-18 with respect to preserving and enhancing existing communities. How does major in fill and high density development maintain existing character? What happens if this is contrary to the desires of residents and land owners and they do not move forward with in fill and redevelopment? O-098-279

Page 44 Cities in rural areas

Page 44 paragraph 1

O-098-273 This concept comes from adopted public policy in VISION 2020 and local comprehensive plans.

O-098-274 Comment noted.

O-098-275 Comment noted.

O-098-276 This is simply stating that VISION 2040 supports a compact development pattern and recognizes that issues are to be addressed at the local jurisdiction level.

O-098-277 This is calling for redevelopment within the UGA. It supports both commercial and residential activity.

O-098-278 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003). This is a revision of an existing policy. VISION 2040 recognizes there are a variety of communities and forms of development within the region.

O-098-279 Do not concur. The policies seek to protect key assets while allowing growth, and one policy speaks to underutilized areas. This is a revision of existing policy adopted in the 1995 VISION 2020.

"Cities in rural areas should also be the focal point s of rural-based industries and commerce. Schools and other institutions and facilities serving rural population should be located in rural cities". – there are several problems with this concept.

1. RCW 36.70A.365 makes specific provision for locating major industrial developments outside of UGA.
2. Rural industries and rural commerce by their very nature are normally spread throughout the rural area. Most of the major employment for Kitsap County is located in diverse rural locations.
3. With all of the emphasis on walking, bicycling, and transit use it is not clear how those transit modes support locating everything in "rural cities" Additionally, it is not clear how rural residents access theses services with out use of POV. When 75% of you population is rural in character, it would appear that the POV is the primary means of transport.
4. School districts may not find it appropriate to locate facilities in cities to support rural residents. Further the division of school districts between county based districts and city based districts make such arrangement difficult.
5. Does the concept of facilities also include waste transfer stations, sewage treatment facilities, criminal detention facilities, and housing facilities for sex offenders?
6. How do already dedicated stand-alone industrial areas such as SKIA fit this concept? Will the area be served by some set of several Park –and-ride lots? What happens when the employees are unionized and they insist on more flexible travel and or parking spaces?

O-098-280

Page 44 Policies

MPP-DP-20 "to prevent the conversion of rural lands to commercial uses" – this again exceeds GMA requirements. Nothing in either the Rural element or the economic development element under RCW 36.70A.070 restrict reasonable commercial development in rural areas. In Kitsap there are several designated industrial areas that are in isolated rural areas. The planning concept is to permit businesses the greatest flexibility with regard to location.

O-098-281

MPP-DP-21 Promote transit service to and from existing cities in rural areas. – this is a transportation policy and not a development policy. What about service for the rural area that lies between the cities? Do they not get equal service or do they just pay taxes for services not provided. Throughout the region, transit service is heavily subsidized by public funding. It is not appropriate to plan to deny taxpayers equal opportunity for service just because they do not live in an area preferred by policy makers.

O-098-282

Page 45 Paragraph 2

"GMA states that cities are the preferred provider of urban services" another misquote. GMA, at RCW36.70A.020(20) states that; "include those public services and public facilities at an intensity historically and typically provided in cities". Under RCW36.70A.110(4) states " In general cities are the units of local government most appropriate to provide urban governmental services" The difference is that, under GMA, those services can exist and be provided in rural areas. For example, a public utility water district can be created to serve a rural area. That same public utility may serve both cities and rural areas. Similarly, a municipal sewer district may offer serer services to rural residents located in close proximity to the sewer lines. RCW 36.70A.110 (4) provided further information of extending urban services to rural areas.

O-098-283

Page 45 Paragraph 2

"UGA will be a thing of the past" – there is no provision for this statement in GMA. The dictate that no new UGA may be created and that all UGA must be incorporated or annexed is not a requirement of

O-098-284

O-098-280 Comment noted. VISION 2040 calls for cities in rural areas to be focal points. In the rural subsection of the Development Patterns section, policies speak to rural industries and commerce as well. Also refer to the Issue Paper on Rural Areas. (82% of the employment in Kitsap County is within the UGA.)

O-098-281 Comment noted. This is a revision of an existing policy adopted in the 1995 VISION 2020. Also, see the Issue Paper on Rural Areas for more on industry and commerce in rural areas.

O-098-282 Comment noted. Policy is not intended to deny service, but to provide it efficiently.

O-098-283 GMA restricts the provision of urban services in rural areas.

O-098-284 The statement refers to the unincorporated urban areas (not UGAs as a whole), which are envisioned to be a thing of the past by 2040.

GMA.

Page 45 Goals and policies

Goal: All unincorporated lands in UGA will either annex into existing cities or incorporate into new cities". – while this is stated as an expectation in GMA it is neither a goal or a requirement. The region cannot force annexation or incorporation. O-098-285

MPP-DP-22 This entire policy statement is inappropriate. Who decides what city UGA relationship should exist to predicate eventual annexation? Who determined that annexation was preferable to incorporation? Where does GMA address the specific of this policy? O-098-286

MPP-DP-23 The entire concept of "joint" responsibility has major drawbacks. O-098-287

1. A citizen votes in the county but is subject to city regulation. How is representation and accountability maintained?
2. A county citizen appeals a decision by a city agency he has been placed under by city/county agreement. What judicial body hears the case?
3. A county resident just inside the dividing line for joint responsibility objects be being subject to higher fees, more stringent regulations and longer waiting period that his neighbor across the street filing an identical permit. How is that resolved? Who does the citizen under joint planning sue for damages?

MPP-DP-24 This policy may be appropriate so long as the jurisdiction does not require a waiver of future rights, specifically regarding annexation, as a prerequisite for service. O-098-288

Page 46 Rural lands

This entire section is at significant disagreement with the provisions of the GMA at RCW 36.70A.011, 36.70A.020(6), 36.70A.030 (14) thru (17)and 36.70A.070(5) for starters. The concept that rural lands are to be maintained in that state in perpetuity is just flat wrong and not supported by GMA or law. O-098-289

Page 46 paragraph 1

"form an unique asset" The most unique element associated with rural land is that it is owned by someone and has a very specific set of rights associated with that ownership. It is apparent that the rights associated with ownership are not understood or appreciated by the drafters because they have been ignored throughout this document. O-098-290

Page 46 paragraph 1

"Rural lands buffer large resource areas" – it is not clear how rural lands can buffer something that is also a rural land. Provide specific detail on the rural lands that serve as "buffers". O-098-291

Page 46 paragraph 2

In some cases, rural services such as sanitary septic systems, wells and roads have become overused causing environmental pollution as well as health and safety problems. What is the basis for this statement? Provide specific data and analysis to support this claim? Does identified non-repairable septic system failure provide moiré direct sewage effluent dump into streams, rivers, the Sound, or critical areas than from municipal or public sewage systems? Are roads over used because cities and counties have permitted growth without meeting concurrency requirement? Exactly what health and safety problems are created by rural living that are not present in urban living? O-098-292

Page 46 paragraph 3

O-098-285 Comment noted.

O-098-286 Cities, counties, countywide planning organizations, and citizens living in unincorporated areas are involved in making these decisions.

O-098-287 Comment noted. This is a revision of an existing policy. Joint planning between cities and counties is a provision of RCW 36.70A.210.

O-098-288 Concur.

O-098-289 Comment noted.

O-098-290 Comment noted.

O-098-291 Comment noted. The GMA makes a distinction between resource lands and rural lands. See RCW 36.70A.030.

O-098-292 The statement refers to "some cases." Evidence that problems have occurred is found in county comprehensive plans and environmental documents. Also, see EIS.

Please provide the specific reference paragraph in GMA that requires "conserve rural lands and protect those unique areas, along with their ecological and economic importance , by concentrating growth in urban areas, and conserving open space and resource lands. This requirement does not appear to be consistent with RCW 36.70A.011, 36.70A.020(6), 36.70A.030 (14) thru (17)and 36.70A.070(5) for starters.

Page 46 paragraph 3

"framework to guide preservation and enhancement of rural lands." Once again the GMA reference for this action is not clear and appears contrary to GMA references cited above. Please provide the specific GMA reference for the intended actions.

Page 46 paragraph 5

Please see the discussions above concerning rural lands. This paragraph appears to be a summation of all previous paragraphs and suffers the same fatal flaw of not being in accordance with the goals and requirements of GMA.

Page 46 Goals and policies

Goal: region will permanently sustain…… rural lands" - This goal is not consistent with the goals and requirements of GMA and is not supported by GMA.

MPP-DP-26 "Avoid additional fully contained communities outside designated UGA.." – those communities are allowable and permissible under GMA. They play a vital role in economic development of the area. This policy is not appropriate and not consistent with GMA.

MPP-DP-27 This one goes a bit too far requiring a county to subordinate its land use decisions to a regional oversight. There in nothing in GMA or the state Constitution that requires or indicates that such oversight is appropriate. Please provide the specific authority reference for this policy.

MPP-DP-28 - it is reasonably clear that the intent of this policy is to revoke and put void all vesting agreements for rural land. There is no basic authority at either the regional or county level to do so without legislative action. The revocation of vested rights would be such a demonstration of bad faith as to result in endless litigation. What is the fiscal impact for this policy?

Page 47 Policies

MPP-DP-29 "permanent rural lands" – one more example of a policy that is not supported by and which exceeds the spirit, intent, and language of GMA and violates the constitutional protections for private property.

Page 47 Paragraph 2

A review of Appendix 2 reveals that the processes for assigning metrics to policies, measuring to those metrics, analyzing the data collected and the progress being made are woefully inadequate. In many cases the "monitoring" is as subjective as the policy it is supposed to monitor. Appendix needs a major rewrite to provide any reasonable expectation of accurately monitoring the success of these policies. In addition, the staffing and the other physical assets needed to execute the monitoring program are not addressed to enable a fiscal impact. Asset requirement listing is provided and the required fiscal impact statement is nm not provided.

Page 48

Goal "provide a range of affordable, healthy, and safe housing choices to every resident of the region" –

(Comment continues on following page)

O-098-293 O-098-294 O-098-295 O-098-296 O-098-297 O-098-298 O-098-299 O-098-300 O-098-301

O-098-293 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003). GMA speaks to preservation of rural character. See RCW 36.70A.030 and 36.70.070(5), as well as 36.70A.110.

O-098-294 See response to O-098-293.

O-098-295 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-296 Comment noted. This does not prohibit creating fully contained communities.

O-098-297 Comment noted. Advance review and comment provides input to county decisionmaking bodies.

O-098-298 Comment noted. "Using tools to address vesting" recognizes vested lots and does not seek to revoke them.

O-098-299 Comment noted.

O-098-300 The monitoring program is a starting point. Additional work on monitoring will follow.

O-098-301 This is a regional goal. Many stakeholders are needed to make progress towards implementing the goal — including all levels of government and the private sector. Also, see Fiscal Impact sidebar.

GMA addresses affordable housing choice in its goals. How are safe and Healthy defined? How are these qualities to be provided? How is this policy to monitored effectively. What is the public and private fiscal impact of this policy.

Goal: "promote fair and equal access to housing for all" – this is not a GMA requirement but the concept of fair and equal access is addressed by other law and regulation. Why is this policy necessary in a growth management document? How will success of the policy be monitored? What is the fiscal impact of this policy.

Page 48 paragraph 1

"Housing is a basic need for every individual." – this is a correct statement and is validated by Maslov's critical needs criteria. Unfortunately, earlier in this document housing was addressed as a specific right of all with assurances they all would be provided housing. Providing housing for every resident is not a goal or requirement under GMA and is not a responsibility delegated to government.

Page 48 paragraph 2

In the changing demographics paragraph there are a number of assertions regarding family numerical composition which is a consideration when addressing future housing needs. On what data set is this information based and how has that data been tested and verified? Is the data applicable to all areas of the region or different for different geographic areas?

Page 48 paragraph 2

"population is becoming far more racially diverse" – while perhaps true, what part does this play in determining housing needs to be planned for. Is there some difference in housing needs based on race? If so, what is that need and how has the basis for that determination been validated?

Page 48 paragraph 3

"Finding affordable housing options near employment centers can be difficult for many moderate and lower wage workers" – in reality the affordable and desirable collocation impact almost all wage brackets. Fortunately, most Americans are willing to tolerate a reasonable commute in exchange for the housing they desire. The current trend in city centers, even those with good job markets is that the individual who can afford to live near work frequently choose to find housing more suitable to their needs and desires by leaving the center city area. The issue is much more complex than simply building a bunch of housing units next to the factory.

Page 48 paragraph 4

"Homeownership… rates for minorities remain well below the average rate"- what is the significance of this statement relative to determining housing needs to be planned for. Is there some difference in housing needs based on race? If so, what is that need and how has the basis for that determination been validated? Is it possible that the Ownership numbers may be skewed by first or second generation immigrant minorities who are still trying to establish themselves economically?

Page 48 paragraph 4

"prices outpacing income growth over the last several years" – this condition has been apparent for at least the last 10 years.

Page 48 BOX

9/6/2007

Continuation of O-098-301

O-098-302

O-098-303

O-098-304

O-098-305

O-098-306

O-098-307

O-098-308

O-098-302 This goal is in response to the Fair Housing Act of 1968, expanded through the Fair Housing Amendments Act of 1988. Washington state law reinforces the federal act through the Washington Housing Policy Act (RCW 43.183B).

O-098-303 Comment noted.

O-098-304 To improve readability, VISION 2040 does not include citations for each of its provisions. See the VISION 2040 Issue Paper on Housing for more information.

O-098-305 This is a statement of fact regarding demographics.

O-098-306 Comment noted.

O-098-307 This is a statement of fact regarding demographics.

O-098-308 Comment noted.

Thereby reducing the budget available for basic necessities and amenities" – amenities should not be included in this discussion. People must make choices and one of the most elementary choices is need as opposed to wants. In policy making dealing with affordable housing , the housing needs are considered and the non-housing wants are not.

O-098-309

Page 48 BOX

"housing costs within and urban region" – housing affordability considers the entire housing stock available both urban and rural.

O-098-310

Page 49 Paragraph 1

"Jobs-housing balance is a concept" – is it a concept or a theory? If a concept, who originated it and what is the underlying data set on which the concept is based? Does the data set match or fit local conditions throughout the region or is it limited to certain areas?

The remainder of the paragraph describing how the balance will be achieved is a bit problematic.

1. Businesses will not normally locate in areas that do not provide a skilled workforce readily available.
2. The policies of the Development section are clear in the intent to drive development into designated areas regardless of employment opportunities with the business to follow.
3. Individuals will not normally move into a city center area except to gain close proximity to work. With no ready jobs they will not move in. When they do decide to move, the employment opportunity will have to be one that matches the cost of housing.
4. Even if workers were to move into center areas before business they would need work in order to afford the housing. That in turn would require a type of transportation not supported by policies of this document.

O-098-311

Page 49 paragraph 2

"Offers mobility options for residents who do not drive or have access to vehicles" – basing development plans and housing affordability plans on the conditions of less than 5% of the area population is not consistent with the needs of the citizens in general. What is the data that those who do not drive or who do not have access to vehicles are not able to cope under existing circumstances? What are the exact number involved with respect to work commuters?

O-098-312

Page 49 paragraph 3

The numbers concerning housing permits and UGA is interesting but not pertinent to the discussion. Those numbers do not reflect the desires of individual people seeking homes but do reflect the development regulations already imposed by the counties. If counties do not issue rural development permits, or if they make those permits more difficult to obtain, the results will be obvious. Those numbers do not reflect the known desires of Americans with regard to housing desires.

O-098-313

Page 49 paragraph 4

"including small lot single family" – this is not the preferred housing of most Americans. Houses that fill entire lots with on yard space and small garages are not the American Dream. Houses with more floor space than is available in the lot are not top priority for working families.

O-098-314

Page 49 paragraph 5

The use of accessory dwelling units in rural as well as urban areas is a significant factor in affordable housing for elderly parents and children just staring out. There is no logic to limit ADU to urban areas.

O-098-315

O-098-309 Comment noted.

O-098-310 Comment noted. The term "urban region" refers to the region, not just land inside the UGA.

O-098-311 Statement is meant to provide a simple definition of jobs-housing balance.

O-098-312 Comment noted. See the Issue Paper on Transportation.

O-098-313 Comment noted.

O-098-314 Comment noted.

O-098-315 Concur.

Page 49 paragraph 6

It is interesting to note that in the 1970's many of the homes in the region were "all-electric" and had an effective zero carbon emissions. Over time, the environmental concerns effectively eliminated access to low cost hydroelectric power and prevented development of nuclear power. The result is that, through environmental activism, truly 'green" houses are no longer green and we are trying out new environmental policies to fix those that failed.

O-098-316

Page 50 paragraph 1

GMA identifies housing… to be addressed in multicounty planning policies to serve as the common planning framework…" Please provide the specific GMA reference. While GMA addresses housing as a goal and discusses the housing element for CPP and Comprehensive Plans, there is no known requirement for a regional; framework to guide the counties.

O-098-317

Page 50 paragraph 2

"Through efforts to designate where growth is to go, the region…" – this is a responsibility assigned to counties and cities under GMA. There is no need for a region to play any role in this decision process. Please provide the specific GMA reference that assigns the responsibility to a "region"

O-098-318

Page 50 paragraph 3

"Housing advocacy groups" and "Interest groups" need clear definition. Over the past ten years the advocacy groups and interest groups with the greatest voice in housing and development related issues has been the environment lobby. Their basic argument has been "no growth" with an alternate of "no growth allowed in rural areas". It would appear form the policies in this document, that lobby remains of primary concern to policy makers.

O-098-319

Page 50 paragraph 5

"Special emphasis is placed on providing affordable and appropriate housing for low-income, moderate-income, and special needs households." – while this may appear to be socially appropriate and meet standards of political correctness it is inappropriate if it has impact on providing housing for family wage level earners involved in the economic development associated with the projected growth.

O-098-320

Page 50 paragraph 6

"Achieving an equitable distribution of affordable and special needs housing so that it is widely available throughout the region and not overly concentrated in a few places" – is this supposed to say "affordable special needs housing"? if not, it makes no sense since the development section has already directed development to designated areas. Is not special needs housing really a separate category of housing that should not cloud general housing policies?

While there may be a desire to have a special needs house or two in every neighborhood, if there is no demand for those homes in those locations they become undesirable housing units

O-098-321

Page 51 Policies

MPP-DP-31

The policy addresses housing needs but not housing desires. Should it be taken to mean that this policy and other like it no longer consider the desires of citizens in defining housing choices?

O-098-322

O-098-316 Comment noted.

O-098-317 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-318 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-319 There are a wide range of groups in the region, from the Master Builders to the YWCA.

O-098-320 Comment noted.

O-098-321 VISION 2040 was revised to add language on special needs housing.

O-098-322 VISION 2040 has been revised to address this issue.

MPP-DP-36

This is a transportation policy that does not belong in this housing section. Further, the policy ignores that rural taxpayers provide funding for services that they are being specifically denied by this policy

O-098-323

MPP-DP-37

In Kitsap County this means more rural housing and better rural roads.

O-098-324

Review notation

In order that this initial draft review be available for submission on August 1, 2007, detailed review of the remainder of the document is being held in abeyance. The review of the remainder of the document will be submitted separately at a later date. However, in order to maximize the value of this review to the PSRC drafters, comments on Goals and policies For Part III Elements of Orderly Development and remaining parts of the document are provided.

O-098-325

Part III

Goal: "promote physical, social, and mental well-being" – Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy?

MMP-DP-39

"Incorporate provisions addressing health and well being" - Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy?

O-098-326

MPP-DP-40

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy?

O-098-327

MPP-DP-41

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? How would the "design guidelines be enforced to ensure achievement of this goal?

O-098-328

MPP-DP-42

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? What portion of the farmland in the region produces foodstuffs as opposed to other products?

O-098-329

MPP-DP-43

What is the long range economic impact of TDR? What title companies and professional real estate organizations enthusiastically support the TDR concept? What is the fall back position if TDR do not work as envisioned? What is the impact of rezoning on the value or validity of already executed TDR?

O-098-330

O-098-323 Do not concur. See the Issue Paper on Housing.

O-098-324 Comment noted.

O-098-325 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (see response to O-098-003). Also, see the Issue Paper on Health and RCW 36.70A.

O-098-326 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (see response to O-098-003). Also, see the Issue Paper on Health and RCW 36.70A.

O-098-327 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (see response to O-098-003). Also, see RCW 36.70A and RCW 47.80.026.

O-098-328 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-329 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-330 Comment noted. Work on the regional TDR project has just begun in response to RCW 43.362.

MPP-DP-44

The policy applies "incentives" (read tax revenues) to products that are already in the market place or being market driven. The major restraint on "innovative techniques" is government regulation. Delete this policy and replace it with one that eliminated government roadblocks to innovation by builders and developers.

O-098-331 Do not concur.

MPP-DP-47

The individuals who have owned property adjacent to military facilities which predates those facilities have every right to expect to gain useful enjoyment of that property. When conflict exists, eminent domain, as used to create the PSNS security buffer in Bremerton, is the appropriate government action.

O-098-332 Comment noted.

MPP-DP-48
Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? This policy is a transportation policy and not appropriate for this section. Since there is no policy addressing roads and highways with respect to concurrency, are we to assume that those facilities will not have top priority?

O-098-333 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (see response to O-098-003). Also, see RCW 36.70A.108.

MPP-DP-49

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy?

O-098-334 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

Goal: The region will use design to…. Restore the environment." - Please provide the specific GMA reference for these requirements. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy?

O-098-335 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

MPP-DP-50

This policy is totally subjective and there is no practical way to assess achievement. Delete this policy or rewrite it in objective, measurable terms> What is the cost impact of this policy?

O-098-336 Comment noted.

MPP-DP-52

This "collective" policy is subjective in nature and duplicates a number of previous more specific policies. Please provide the specific GMA reference for each of the elements in this requirement. Please cite the specific GMA goal that covers each element. What is the fiscal impact of this policy?

O-098-337 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

MPP-DP-53

Will not the market place determine the type and size of buildings that are required. Is the intent of this policy to predetermine what buildings should be constructed and then force business and residents into those buildings. How will success of this policy be measured? What is the fiscal impact of this policy?

O-098-338 This idea was considered in the VISION 2040 process and the language was kept as written.

MPP-DP-54

Please provide the specific GMA reference for each element of this policy? Please cite the specific GMA goal that covers each element. What is the fiscal impact of this policy? Of note, you forgot to include saving the starving around the world and world peace.

O-098-339 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

MPP-DP-59

The goal as written is would be virtually impossible to implement in any meaningful manner and has no reasonable means to determine success.
The Economy

Overarching Goal: The goal as written is would be virtually impossible to implement in any meaningful manner and has no reasonable means to determine success.
How about reducing this subjective prose to a simple –"Provide a business friendly environment that supports the growth of existing business and the introduction of new business into the region"?

Goal: The statement is a statement of fact. Unfortunately, the drafters do not recognize it as such.

MPP-EC-1

"Family wage jobs" is not defined. Would it not be more reasonable to first support existing business and their growth and then target business that is actually a wealth generator for the region?

MPP-EC-2

Instead of trying to use government to "help" business, why not have a policy that minimizes the impact of government on business. The market place, when not encumbered by government regulation and assistance, seems to thrive very nicely.

MPP-EC-3

Why "cluster industries"? Why not any industry that generated wealth retained in the state and region and provides jobs that allow its employees to live here?

MPP-EC-4

This policy requires expenditure of public funds for fishing expeditions. If we simply make the business environment friendly and competitive with other states we will succeed. Once we start the "incentives" route we are stuck with that mode of operation.

MPP-EC-5

Great policy statement but it requires action at the state level to happen. Why is the policy not written as a directive to make changes at the state level?

MPP-EC-6

While this policy recognizes in part the absolute need for a robust transportation infrastructure to move goods and services, it is contradictory by almost every other policy dealing with development. Goods and services move primarily by road to and from industry and businesses. Consumers reach business by road or are serviced by business over roads. Please note that pedestrian and bicycling mobility play a very small part in the movement of goods and services.

MPP-EC-7

Please see the comments for EC-2. The policy will soon become regulatory rather than suggestive and contrary to the basic goals for economic development. Place some trust in businesses to be responsive to market place demands and to act responsibly as good neighbors and good stewards. It is time to get over the "Business is evil" approach.

Goal: "investing in …people"- Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy?

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O-098-340 Comment noted. This policy has been rewritten.

O-098-341 This proposed rewrite is too narrow for the Economy section's overarching goal. Do not concur.

O-098-342 VISION 2040 addresses this issue by providing a sidebar on the same page as the policy and by defining the term in the Glossary. Policy MPP-Ec-1 does "first support" existing businesses and their growth, and then discusses recruitment.

O-098-343 VISION 2040 proposes coordination and collaboration with the private sector.

O-098-344 See Prosperity Partnership's Regional Economic Strategy. See the Issue Paper on Economics.

O-098-345 VISION 2040 does not mean to imply that public funds be spent in this manner.

O-098-346 This idea was considered in the VISION 2040 process and the language was kept as written. See RCW 36.70A.103.

O-098-347 Do not concur.

O-098-348 VISION 2040 promotes collaboration between government and businesses. This policy has been revised.

O-098-349 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

MPP-EC-9

Education is the primary responsibility of the state. This policy is unnecessary. O-098-350

MPP-EC-11

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? O-098-351

MPP-EC-13

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? While the policy may be admirable as social engineering, a more proven and effective method of economic advancement is called assimilation. O-098-352

Places

Goal: The regions economy prospers when current business is allowed to grow and thrive and new business finds this a desirable place to locate. The goal statement is worded as a statement of fact. Please cite the economic reference for the claims made in the goal statement. Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? O-098-353

MPP-EC-14

What does this policy mean? How would it be implemented? Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? O-098-354

MPP-EC-15

This policy has no meaning whatsoever as relates to economic development. Further, the policy is little more than a regurgitation of environment activist dogma. The terminology used in the policy is government babble, without real meaning or definition. Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? O-098-355

MPP-EC-16

This policy appears to be at odds with development policies that direct almost all economic development to centers or UGA. Resolve the matter. Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? O-098-356

MPP-EC-17

This policy, similar to the population "focus" in centers does not recognize the role played by business in the decision about location. If you really want meaningful economic development be prepared to warmly greet every wealth generator who shows up on our door step with a friendly smile and the question "What do we need to do to have you join our community? O-098-357
MPP-EC-18

O-098-350 Comment noted. See Prosperity Partnership's Regional Economic Strategy.

O-098-351 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-352 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-353 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-354 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003). This is a revision of an existing policy.

O-098-355 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003). This is a revision of an existing policy.

O-098-356 This policy is consistent with other policies related to growth centers and there is no need for change. This is a revision of an existing policy in the adopted 1995 VISION 2020.

O-098-357 Comment noted.

Please refer to the comments on EC-17. Housing and/or good transportation infrastructure needs to support business, where ever they choose to locate.

MPP-EC-19

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? What is the model of success for this type of policy? How will the success of this policy be measured?

MPP-EC-20

This is not the wording used by GMA or in compliance with the spirit and intent of GMA. Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy?

Transportation

Goal: maintain and improve its existing urban and rural transportation systems" – the GMA requirement for concurrency already covers this, except that it deals more directly with infrastructure and levels of service. This goal does not appear to meet the spirit and intent of GMA. Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter.

MPP-T-1

This policy does not address cost effective transportation, as demonstrated through use. Further it does not recognize the constitutional requirements of Article 2, section 40.

MPP-T-2

How does this policy address the cost of road maintenance, improvement, and new road construction at the county and city level? Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy?

MPP-T-4

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? Just exactly how will this policy be implemented?

MPP-T-5

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy?

MPP-T-6

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy?

Supporting Growth Strategy

Goal: This goal does not address existing infrastructure and eludes discussion of roads. Please provide

(Comment continues on following page)

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O-098-358 Comment noted.

O-098-359 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003). This is a revision of an existing policy in the adopted 1995 VISION 2020.

O-098-360 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-361 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (see response to O-098-003). Also, see the State Transportation Plan.

O-098-362 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (see response to O-098-003). Also, see the State Transportation Plan.

O-098-363 This policy does not address cost. This is not a requirement; it is a revision of an existing policy. See the state's Transportation Plan.

O-098-364 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-365 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (see response to O-098-003). Also, see the Issue Paper on Transportation.

O-098-366 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (see response to O-098-003). Also, see the Issue Paper on Transportation.

O-098-367 Roads are mentioned on the first paragraph under the goal. This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy?

Continuation of O-098-367

MTT-T-7

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? Individual counties and cities, to meet concurrency requirements, address planning through Transportation Improvement Programs that are specific to the jurisdiction. Why is there any need for county or city TIP to be the subject of regional discussion? King county residents do not pay Kitsap Property tax to our road funs so they have no role in determining how we spend those dollars. If other counties desire to donate dollars to Kitsap for pet projects, arrangements can probably be made.

O-098-368

MTT-T-8

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? Of note, the primary player in this equation, the developer, has been excluded from the decision making process.

O-098-369

MTT-T-9

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? The exclusion of roads from this policy is both inappropriate and shortsighted. Our roads are essential to economic health of the state. We have already lost one major business because, in part, of poor road systems and a failure to plan adequately for the future.

O-098-370

MTT-T-10

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? This policy is directly contrary to Article 2, section 40 of the Constitution. This policy has no real meaning in Kitsap County.

O-098-371

MTT-T-11

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? This policy appears to be contrary to most other transportation policies. Good transportation policy does not just link hubs and ignore the remainder of the area. Good transportation policy recognizes reality and meets the needs of that reality.

O-098-372

MTT-T-12

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? How is this policy to be implemented? How will success of this policy be determined?

O-098-373

MTT-T-13

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? For each county and city of the region, what are the numbers of individuals who walk or bike to work, to shopping, and to all other family activities? What is the number who use public transit for those purposes? What is the number who use POV? In

O-098-374

(Comment continues on following page)

O-098-368 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (see response to O-098-003). This is a revision of an existing policy. Also, see RCW 47.80.

O-098-369 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members see response to O-098-003). This is a revision of an existing policy. Also, see RCW 47.80.

O-098-370 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (see response to O-098-003). This is based on several existing policies adopted in the 1995 VISION 2020. Also, see RCW 47.80.

O-098-371 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003). This is a continuation of adopted policy and based on several existing policies. There are three regionally designated centers in Kitsap County.

O-098-372 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (see response to O-098-003). This is a revision of an existing policy adopted in the 1995 VISION 2020. Also, see RCW 47.80.

O-098-373 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (see response to O-098-003). This is a revision of an existing policy adopted in the 1995 VISION 2020. Also, see RCW 47.80.

O-098-374 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (see response to O-098-003). This is a revision of an existing policy adopted in the 1995 VISION 2020. Also, see RCW 47.80.

developing the number, any individual who uses POV for any key function is to be counted as part of the POV universe.

MTT-T-14

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? Does this policy mean roads? It is difficult to understand the intent of the policy, how it will be implemented, or how success will be measured. Could the policy be written more clearly and in simple English?

MTT-T-15

Once again this requires a robust road system. Beyond that, the "freight transportation system" is essentially private enterprise. This is a business issue not addressed in the economic development section.

MTT-T-16

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? As written, should BNSF want to expand and should that expansion not be compatible with state, regional and local plans, the expansion could be denied. How is this good economic policy or good transportation policy?

MTT-T-17

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? This is another policy that is contrary to a business friendly atmosphere. First, there are standards in place concerning pollutants and emissions that all businesses are required to meet. Each business will operate in a manner consistent with market forces and practices demanded by their customers. What is the specific value of this policy and how will it be implemented?

MTT-T-18

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? Such constraints will most likely be contrary to cost effectiveness and efficient operation. Why is this policy necessary and how will it be implemented?

MTT-T-19

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy?

MTT-T-20

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? What is the specific intent of this policy and how will it be implemented? How will achievement of this policy be assessed?

Greater Options and Mobility

Goal: Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? What is the purpose of this goal? Is

(Comment continues on following page)

Continuation of O-098-374

O-098-375

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O-098-382

O-098-375 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (see response to O-098-003). This is a revision to an existing policy adopted in the 1995 VISION 2020. A rewrite was considered but the original language was retained. Also, see RCW 47.80.

O-098-376 Do not concur. See RCW 47.80.

O-098-377 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (see response to O-098-003). Also, see RCW 47.80.

O-098-378 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003). This is a revision to an existing policy adopted in the 1995 VISION 2020.

O-098-379 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-380 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (see response to O-098-003). Also, see RCW 47.80.

O-098-381 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-382 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

this not the meaning of concurrency as implemented in GMA?

MPP-T-21

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? Can you say "Build new roads"?

MPP-T-22

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? If rural residents pay road fund property taxes, why should they be deprived some of the benefits of those taxes? Does this policy also mean that roads to support economic development in rural areas will not normally be allowed?

MPP-T-23

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? How does this policy meet the needs and desires of citizens? What data is the source to justify policies that eliminate the POV as the primary means of transportation for individuals and families?

MTT-T-24

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? Please explain how this policy complies with Article 2, section 40 of the Constitution?

MTT-T-27

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? This policy indicates use of public funds for private benefit. Would the policy not be better is written to encourage and facilitate the desired action and then eliminate government regulation that makes achieving the goal difficult?

MPP-T-28

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? This policy, as written, defies understanding. Rewrite this policy in simple English using commonly accepted (by the public) terminology.

Public Services

Goal: The goal as stated is a deviation from GMA concurrency requirements and involves more that required by GMA. Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy?

MPP-PS-1

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy?

MPP-PS-2

Continuation of O-098-382 | O-098-383 | O-098-384 | O-098-385 | O-098-386 | O-098-387 | O-098-388 | O-098-389 | O-098-390

O-098-383 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-384 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003). This is an existing adopted regional policy. The purpose is to prevent unplanned growth by managing access and zoning. A portion of PSRC managed funds go to rural projects and programs.

O-098-385 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (see response to O-098-003). This is based on several existing policies adopted in the 1995 VISION 2020. Also, see RCW 47.80.

O-098-386 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (see response to O-098-003). Also, see RCW 47.80.

O-098-387 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (see response to O-098-003). This is based on several existing policies adopted in the 1995 VISION 2020. Also, see RCW 47.80.

O-098-388 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003). This is based on several existing policies adopted in the 1995 VISION 2020. VISION 2040 was revised to address this issue.

O-098-389 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-390 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

This policy appears to address concurrency. If a policy is required, please use the same terms and language used in GMA.

MPP-PS-4

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? This policy appears to be in conflict to GMA. Does Urban services include water districts and utility district who may provide such services? Are fire protection and police protection urban services?

MPP-PS-5

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? PS-5 appears to be indirect conflict with PS-4.

MPP-PS-6

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy?
MPP-PS-7

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? Does this policy include all recycling or just that recycling that is actually resource and cost efficient?

MPP-PS-9

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy?

MPP-PS-10

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? In Kitsap County, so long as the septic systems function properly and until such time as effective and safe waste water injection recharge is in place, this is not a good policy. Septic systems are primary sources for aquifer recharge. Kitsap hydrology is not the same as the rest of the region.

MPP–PS-11

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? The purpose of this policy and how it will be implemented is not clear. In Kitsap County, alternate drain fields are required prior to system permitting. Those alternate drain fields are the "fix" for a system experience difficulty. Expensive, high maintenance systems are not the answer.

Water Supply

Goal: This goal establishes criteria that exceed federal and state requirements without providing substantive argument for such action. Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy?

MPP-PS-12

O-098-391
O-098-392
O-098-393
O-098-394
O-098-395
O-098-396
O-098-397
O-098-398

O-098-391 This is a revision of existing policy adopted in the 1995 VISION 2020. The language was kept as written.

O-098-392 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003). Urban services are discussed in several locations within the GMA.

O-098-393 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (see response to O-098-003). Draft policy MPP-PS-4 refers to urban services (e.g., sewer). Draft policy MPP-PS-5 refers to other public facilities and utilities (e.g., school serving rural residents). Also, see Issue Paper on Rural Areas.

O-098-394 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-395 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003). The type of recycling is not defined.

O-098-396 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-397 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-398 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? Why is this policy necessary in light of the existing WRIA program. Does PSRC intend to take over WRIA for the region? Exactly what "climate change" are we concerned about? What are the potential impacts? How will this policy be implemented? How will the achievement of success of the policy be measured? O-098-399

MPP-PS-14

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? What if a new industry requires water but returns the water to the "system"? How will this policy be implemented and measured? O-098-400

MPP-PS-15

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? As written, this policy is subjective and not clear. What is the actual intent of the policy? How will it be implemented? O-098-401

MPP-PS-16

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? Does this include new hydroelectric power plants"? How about nuclear power plants? Would a wood fired power plant satisfy these requirements? Why is this not a market driven effort? O-098-402

MPP-PS-17

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? Please explain how this policy is consistent with both high density population distribution and economic growth. Are we to find only energy neutral business? This policy makes no sense except as may be the result of technologies developed (not just in the region). How is this policy to be implemented? O-098-403

MPP-PS-18

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? O-098-404

MPP-PS-19

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? O-098-405

MPP-PS-20

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? O-098-406

MPP-PS-21

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that O-098-407

(Comment continues on following page)

O-098-399 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-400 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-401 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-402 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-403 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-404 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-405 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-406 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003).

O-098-407 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003). This is based on existing policy adopted in the 1995 VISION 2020.

Comment Letter

covers this matter. What is the fiscal impact of this policy?

MPP-PS-22
Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? In Kitsap County, with over 75 percent of the population living in rural areas, this policy makes no sense.

MPP-PS-24

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy?

MPP-PS-25

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? The policy is not clear as to intent or implementation. Does "new and existing sources" mean public funding (my wallet)?

MPP-PS-26

Please provide the specific GMA reference for this requirement. Please cite the specific GMA goal that covers this matter. What is the fiscal impact of this policy? This policy seems to indicate that virtually any and all methods will be used to prevent development that is not in strict compliance with the policies herein. Where does the "region" derive authority to suggest much less imp0lement such a policy? Please cite the constitutional authority for regional control over regulatory, pricing, taxing and expenditure practices.

Respectfully submitted,

Karl Duff, President
Kitsap Alliance of Property Owners
6112 Wynn Jones Dr. E.
Port Orchard, WA 98366
Ph: 360-871-2383
Email: kduff@ix.netcom.com

cc: Kitsap County Commissioner Steve Bauer, District 1
Kitsap County Commissioner Jan Angel, District 2
Kitsap County Commissioner Josh Brown, District 3
Kitsap County Administrator Nancy Buonanno Grennan

O-098-408 Continuation of O-098-407
O-098-409
O-098-410
O-098-411

Response to Comment Letter

O-098-408 VISION 2040 addresses this issue by calling for both future growth and infrastructure to occur inside the urban growth area. Based on 2003 estimates, 56% of Kitsap County's population lives within the UGA.

O-098-409 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003). This is a revision of existing policy adopted in the 1995 VISION 2020.

O-098-410 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003). This is a revision of existing policy adopted in the 1995 VISION 2020.

O-098-411 This provision is within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members (also, see response to O-098-003). This is a revision of existing policy and it is not intended to force control over these practices.

League of Women Voters of Washington
4710 University Way NE, #214 ▪ Seattle, WA ▪ 98105-4428
PH: 206-622-8961 ▪ *(outside toll area)* 1-800-419-2596 ▪ FAX: 206-622-4908
Web Site: http://www.lwvwa.org ▪ Email: lwvwa@lwvwa.org

O-099

August 24, 2007

Puget Sound Regional Council
1011 Western Ave, Suite 500
Seattle WA 98104-1035

Subject: League of Women Voters' comments on Vision 2040 draft report

Honorable Members of the Council,

We congratulate the Puget Sound Regional Council on your draft Vision 2040. We find that, on the whole, it clearly sets out your goals and policies for the region in the coming years. O-099-001

We do, however, ask that you strengthen a number of your stated Multi-County Planning Policies and that you include your unique work on incorporating urban design into the regional planning process.

Air Quality. All policies (MPP-En-17, 18 and 19 on page 33) need to be decidedly stronger in order to deal with global climate change, one of the most serious threats to the environment, health and economy of our region and our nation. We urge you to incorporate carbon budgeting and analysis in all transportation and development planning.

The League of Women Voters joins other organizations in calling for immediate action to curb the worst effects of global warming by enforcing reductions in global warming pollution and promoting clean and efficient sources of energy. O-099-002
From the League of Women Voters of the United States' Statement of Principles on Global Warming.

Orderly Development: Concurrency. MPP-DP-48 (page 55) needs to ask more of jurisdictions than that they "address non-motorized, pedestrian, and other multi-modal types of transportation options…" We ask that PSRC encourage jurisdictions to prioritize those options and to integrate multimodal transportation plans with land use plans.

Transportation projects and programs should be prioritized to develop a balanced and seamless transportation system… … … . community livability and character, environmental impacts, energy consumption… must be considered. O-099-003
From the League of Women Voters of Washington position on transportation

Urban Design. MPP-DP-54 – 55 (page 56) need to be strengthened. We appreciate the work done by the task force to include urban design in the long-range regional planning process and ask that you give it a high priority. O-099-004

Economy: Places. MPP-ED-18 (page 62) needs to be strengthened. We urge that areas which are transportation hubs and areas of high density should include a wide range of housing options, including for families. O-099-005

Transportation: Maintenance, Management, and Safety. MPP-T-6 (page 67) should include not only transit-dependent citizens, but also people, whether local or visitors, who choose to not always drive in and around the area. We ask that you use wording that promotes transportation choices, rather than focusing on transit-dependence. O-099-006

Transportation: Greater Options and Mobility. MPP-T-26 (page 71) speaks of air transportation, but there needs to be growing discussion within the region and beyond of passenger rail transportation, because of the per passenger, per mile carbon emissions of rail systems compared to either automobile or air travel. O-099-007

O-099-001 Comment noted.

O-099-002 VISION 2040 has been revised to address this issue. See new policy MPP-En-20. This issue also will be considered during the update of Destination 2030.

O-099-003 This issue will be considered when Destination 2030 is updated.

O-099-004 Comment noted.

O-099-005 VISION 2040 has been revised to address this issue.

O-099-006 VISION 2040 has been revised to address access to employment, and a new policy (MPP-T-24) has been added regarding jobs-housing balance. See the expanded narrative in the beginning of this section.

O-099-007 Rail is addressed in MPP-T-19. The Transportation section encourages partnerships to implement improvements to personal mobility and freight movement.

Comment Letter

We also have a few comments on the text of Vision 2040:

On page 13, the penultimate bullet needs the words "and effectively" added. As we all know, actions need to be both efficient and effective to be most useful to society. O-099-008

On page 70, the first paragraph on greater options and mobility needs to also include passenger rail travel services. O-099-009

And we have some suggestions to help the report reader:

The index should include each category of policies, rather than just the broad headings. O-099-010

The glossary should include

Mitigation banking (from page 11)
Armoring (page 11)
MPP—many readers don't start at the beginning. O-099-011

And, finally, we have real concerns about the timing of the release of your important document. A summer release, with a very early fall deadline for comment does not seem to us to allow sufficient public participation. A principle of the League of Women Voters is

The League of Women Voters believes that democratic government depends upon the informed and active participation of its citizens...

We strongly urge the PSRC to consider better ways of including the public in your process. Some possibilities include better timing of reports, putting hard copies into libraries, and freely distributing DVDs of good visual presentation of at least the core of the planning document. O-099-012

Respectfully,

Barbara Seitle
President
League of Women Voters of Washington

Becky Cox
President
LWVKing County South

Ellen Fisher
President
LWVKitsap

Margaret Johnson
President
LWVSnohomish

Denise Smith
President
LWVSeattle

Lyz Kurnitz-Thurlow
President
LWVTacoma/Pierce

Response to Comment Letter

O-099-008 VISION 2040 has been revised to address this issue.

O-099-009 The paragraph has been revised.

O-099-010 The index will be more detailed in the adopted VISION 2040.

O-099-011 The term "mitigation banking" has been dropped from VISION 2040 based on other comments.

O-099-012 The annual spring General Assembly meeting date dictated the schedule. We have used extended comment periods at each stage of the VISION 2040 process: Scoping, review of the DEIS and draft VISION 2040, and during the review of the Supplemental DEIS. PRSC has distributed CDs/DVDs that discuss the update process throughout the region.

O-120

MASTER BUILDERS ASSOCIATION of King and Snohomish Counties

MBA of King and Snohomish Counties
335 116th Avenue SE
Bellevue, Washington 98004
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f 425.646.5985 www.masterbuildersinfo.com

September 7, 2007 Deleted: August 31

Norman Abbott, SEPA Responsible Official
Puget Sound Regional Council
1011 Western Avenue #500
Seattle, Washington 98104

RE: Comments on Draft Vision 2040

On behalf of over 4,300 member companies, the Master Builders Association of King and Snohomish Counties (MBA) has several comments on the July 2007 Draft Vision 2040.

Our association would like to commend the Council on aiming to plan for responsible growth for both current residents and the 1.7 million additional residents that are anticipated to live in the Puget Sound region by 2040. As you are surely aware, the MBA closely follows population growth trends, the housing market, infrastructure planning and the local economy. One of our top priorities is to ensure that housing remains available and affordable for everyone within the region.

O-120-001

We have several comments and concerns with the draft plan. Our comments are organized below in the order that they occur in the draft Vision 2040 document.

1) **Environmental Framework**
We understand the need for environmental stewardship and that responsible growth should not come at the expense of negative impacts to our natural surroundings. We believe that reasonable growth and progress can occur alongside environmental responsibility.

Our association promotes the Built Green™ program, which incorporates sustainability, low impact development and green building materials into both the development of land and the construction of homes throughout the region. This program is a great example of a tool that can be used by our industry to promote responsible growth while addressing environmental concerns. The MBA promotes this program as an incentive-based approach to development, recognizing that not all sites and locations are feasible for these types of building techniques.

O-120-002

O-120-001 Thank you.

O-120-002 Comment noted.

The plan states that the most significant impact to habitat is loss and fragmentation from clearing and grading land. However, it does not list the current regulations that are already in place to mitigate for those impacts. The MBA has worked on several local critical areas ordinances and has reviewed the best available science that supports these regulations. Current regulations take these impacts into consideration and adequately address potential losses. Often, mitigation projects create even more high quality habitat than what was in place prior to any development.

O-120-003

2) Regional Growth Strategy

The proposed regional growth strategies appear to be in line with the tenets of the Growth Management Act (GMA) - focusing growth in urban growth areas, cities and regional growth centers. Several local cities are well on their way to accomplishing just that, by planning revitalized downtown centers that include a mix of housing, retail use, office space and access to transportation options.

While the plan is focused on locating a significant share of population growth in regional growth centers, we need to ensure that each jurisdiction is taking its fair share of growth to address population targets. While many cities are planning to accept growth, several are doing little or nothing to address future populations needs.

O-120-004

On page 18, the plan states that, "Regional guidance calls for reduced rural population growth rates in all counties." We are opposed to the strategy of reducing or eliminating growth in rural areas. We support dense development in cities and reasonable growth in rural areas. Rural development makes up as much as 15 percent of our growth. We are skeptical that cities are willing to accept an additional 15percent growth to make up this difference.

Often, buildable lands inventories are flawed and don't accurately represent the actual growth that can occur in urban areas and cities. Other times, the infrastructure upgrades are extremely expensive or not even in place in order for development to occur. This then moves the housing market out to rural areas where land is available and responsible growth can be achieved to meet housing demands. Another factor that needs to be considered here is the property rights of rural landowners. A zero growth or limited growth policy in rural areas may well be considered a taking.

O-120-005

3) Multi-county Planning Policies

It is important to recognize that many improvements can best be made at the regional scale. In many cases, it may be easier to secure funding on a regional scale. However, there are many aspects of planning that are best done at the local level.

Vision 2040 calls for an update of all local plans in the central Puget Sound region by December 31, 2010 - and then every 10 years thereafter. These update deadlines are currently guided by state law, and any changes should be coordinated with both the local jurisdiction and the Washington State Department of Community Trade and Economic Development (CTED).

O-120-006

O-120-003 Comment noted. It is recognized that local development regulations contain environmental safeguards and mitigation measures.

O-120-004 Comment noted.

O-120-005 This idea was considered in the VISION 2040 process and the language was kept as written.

O-120-006 VISION 2040 has been revised to address this issue. There is now more discussion on the relationship among multicounty and countywide planning policies and local comprehensive plans, and the role local governments have in implementing VISION 2040.

The plan has an underlying assumption that individual jurisdictions are not capable of planning for their anticipated growth and that regional planning is better. This is simply not always the case. Local conditions may lead to exceptional planning exercises. At a minimum, this section should build in flexibilities to recognize that fact.

a) Environment

MPP-En-11 - *Identify and protect wildlife corridors inside the urban growth area and outside the urban growth area.*

We believe that wildlife corridors are more effective outside the urban growth area and are not necessary or effective within urban settings for wildlife migration. If development is to be focused in areas that are already urbanized and we are already reaching capacity for meeting the needs of future population growth, it seems counter-intuitive to use additional land for wildlife migration corridors in areas where we plan to put more people. Simply put, requiring wildlife corridors in urban areas will lead to further sprawl.

Page 5 states that, "Some tools may be expensive or difficult to implement, or represent a change in the status quo." If that is truly the case, the plan should include a goal to implement retrofitting of existing systems lacking functional stormwater controls as a major step towards improving water quality in the region. We should not underestimate the importance of applying current regulations and practices to retrofit public and private development predating current stormwater management requirements.

a) Development Patterns

I) Land Use

We support the goal that "All citizens of the region will have safe and affordable housing."

We do not support the goal of limiting growth to specific growth centers. In fact, we already plan to focus most growth to Urban Growth Areas – so is not this goal duplicative?

This plan assumes that by 2040 unincorporated urban area growth areas will be incorporated to local municipalities, and urban growth areas (UGAs) will be a thing of the past. This is a grand assumption, as many local jurisdictions are not willing to annex or incorporate the UGAs into their municipal boundaries. If this is truly a goal, more incentives need to be added in order to make this goal a reality. Alternatively, teeth should be added to GMA that require cities to not only have an annexation strategy but also enact urban zoning of at least four net dwelling units per acre.

MPP-DP-26 and MPP-DP-27 should be stricken – The MBA does not support the elimination of fully contained communities (FCC's). This type of

(Comment continues on following page)

O-120-007
O-120-008
O-120-009
O-120-010
O-120-011
O-120-012
O-120-013

O-120-007 VISION 2040 was drafted and adopted by local elected officials. The work recognizes and builds on quality planning at the local level.

O-120-008 Comment noted.

O-120-009 Comment noted.

O-120-010 Thank you.

O-120-011 VISION 2040 does not limit growth to growth centers only.

O-120-012 Comment noted. VISION 2040 contains language that addresses annexation.

O-120-013 This idea was considered in the VISION 2040 process and the language was kept as written, with a minor modification.

development should be considered in areas where it is appropriate, not simply avoided. Why needlessly remove a tool from the toolbox? Otherwise it appears the proposal to dissuade FCC's is purely political.

Continuation of O-120-013

II) Housing

In general, MBA is supportive of the seven multi-county planning policies that specifically address housing. The MBA supports expansion of the housing stock in the region and a broad range of affordable housing choices. We also support the goal of ensuring there is an adequate supply of housing to meet current and projected needs, specifically including small lot single-family developments.

O-120-014

O-120-014 Thank you.

MPP-DP-35 should read: Expand the supply and range of housing, including affordable units ***where economically feasible***, in centers throughout the region.

O-120-015

O-120-015 This idea was considered in the VISION 2040 process and not accepted.

As was mentioned above, the MBA is supportive of incentive-based green building approaches, such as the Built Green™ program. However, we do not support a movement towards requiring or mandating this type of housing development. Our experience shows that such approaches are not always feasible both economically and practically. For example, some soil types simply will not allow for LID, Built Green™ or LEED approaches.

O-120-016

O-120-016 Concur.

III) Elements of Orderly Development

We are supportive of the use of innovative development and a mix of flexible, adaptable and creative designs for builders and developers to utilize during construction to address specific and unique site constraints. The MBA supports encouraging the use of these tools; however, we do not support a move to mandate any specific techniques, such as strict design guidelines, low impact development or green building. Such requirements would drastically hinder the PSRC's goal to keep housing affordable and attainable for all future residents.

O-120-017

O-120-017 Thank you.

We are extremely supportive of **MPP-DP-45,** which proposes to streamline development standards and regulations and minimize additional cost to housing.

O-120-018

O-120-018 Comment noted.

We generally support the concept of Transfer Development Rights programs. However, local government must be mindful that the key to success is a willing and viable receiving area. Also, local government must be careful to not price the private sector out of the market in purchasing development rights.

Comment Letter

c) Economy
The MBA supports the goal of a prospering regional economy and recognizes that the home building industry provides significant contributions to the region by providing family-wage jobs and quality communities for local residents. We are supportive of policies that advance economic development and make it easier for our members to do business in the region. O-120-019

We are extremely supportive of **MPP-EC-18**, which aims to provide an adequate supply of housing to support job creation and economic growth. O-120-020

d) Transportation
It is clear that improving our mobility, while accommodating another 1.7 million more people, will be a challenging task. Many of the larger transportation issues are best addressed at the regional level. However, local control and scrutiny needs to remain within each jurisdiction so that local transportation issues are addressed within municipal boundaries. While it is appropriate for local jurisdictions to coordinate transportation planning with regional efforts, municipal decisions should not be made at the regional level. O-120-021

e) Public Services
Adequate public facilities and infrastructure are crucial for future development within the Puget Sound region. Local jurisdictions often charge impact fees to help cover a portion of the costs of many of these services. We feel strongly that impact fees are an inefficient method of financing infrastructure. The Washington State Legislature needs to move forward on proposals to replace impact fees as a funding mechanism with more broad-based sources. O-120-022

4) **Implementation**
As with most plans, Vision 2040 will need to be adaptable and flexible in order to adjust to unforeseen circumstances that will likely happen over the next thirty years as our region grows. O-120-023

On behalf of the MBA, I would like to commend the PSRC on the draft Vision 2040. Much hard work lies ahead to plan for the growth in the Puget Sound and this plan represents one of the many steps necessary to accommodate an additional 1.7 million residents in our region.

We ask that the PSRC incorporate our comments into the final draft of the Vision 2040 plan. If you have any questions, I can be reached directly at (425) 460-8201.

Sincerely,

Samuel L. Anderson
Executive Officer

Response to Comment Letter

O-120-019 Thank you.

O-120-020 Thank you.

O-120-021 Comment noted.

O-120-022 VISION 2040 has been revised to address this issue. See General policies section.

O-120-023 Comment noted.

Comment Letter

Response to Comment Letter

the Municipal League of King County

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Nick Williamson, *Encrypted Key Technologies*

September 7, 2007

O-148

Norman Abbott,
SEPA Responsible Official
Puget Sound Regional Council
1011 Western Ave., Suite 500
Seattle, WA 98104-1035

Dear Mr. Abbott:

Congratulations are due to the authors of Vision 2040. It contains excellent policies and, we believe, is based on sound analysis. O-148-001

Particularly good features:

1) Inclusion of implementation actions and monitoring measures; we can never achieve the Vision if we don't define the steps needed to achieve it. O-148-002

2) New focus on urban design considerations. These will be key to political acceptance of many of the policies, particularly those calling for significant change in the status quo. O-148-003

3) Setting the Vision in the context of an environmental framework, and creating a new focus on environmental justice O-148-004

5) Strong, clear language demonstrating linkages between land uses, transportation, and public health, including emphasis on the concept of jobs/housing balance as an important goal. O-148-005 O-148-006 O-148-007

6) New emphasis on regional economic prosperity and its importance to the success of the Vision. O-148-008

7) Acknowledgement of the significance of adequately financing implementation of regional infrastructure, services, and other important components of the Vision. Without this critical component the Vision cannot be realized. O-148-009

8) The wealth of information and education material throughout the Vision document which helps the public understand the importance of attaining the Vision, and which helps clarify the Vision's context and many of the important implementation details. O-148-010

Concerns:

Implementation will be challenging:

Despite the excellence and broad appeal of the Vision, there are many large hurdles to achieving it, including political aversion to compact urban development and significant funding constraints. Therefore, it is important that the adoption and publication of the Vision 2040 document not see the end of meaningful public outreach. There should be a major public education effort going forward, which will be needed to generate support for locally elected officials as they strive to implement local plans and policies to carry out the Vision, and to persuade voters to tax themselves appropriately so that they may benefit from the infrastructure and services underlying the Vision. Once the broader public has a firm understanding of the key linkages and tradeoffs inherent in Vision 2040, key barriers to implementation should be significantly lowered. To date, the bulk of the presentations have been made at the city council level to government officials, and there is a need to continue outreach and education to the broader public. In order to focus this effectively, outreach polling (with a possible sample size of 1000) might be a useful tool. O-148-011

O-148-001 Thank you.

O-148-002 Thank you.

O-148-003 Thank you.

O-148-004 Thank you.

O-148-005 Thank you.

O-148-006 Thank you.

O-148-007 Thank you.

O-148-008 Thank you.

O-148-009 Comment noted.

O-148-010 Comment noted.

O-148-011 Concur. Implementing VISION 2040 will require additional outreach post-adoption. General policy action G-Action-1 addresses this issue.

Implementation tools, as they relate to PSRC, are appropriate for the agency as it is presently charged and configured, but they may well prove insufficient to provide the incentives and political clout necessary for local governments to step up to the difficult tasks assigned them under Vision 2040. Consideration should be given to:

- Compilation and publication (and broad publicity for) an annual report by PSRC showing what is working and what is not working—the good and the bad—relative to Vision 2040 implementation. This State of the Region report could provide rationale for the difficult political actions needed to carry out Vision 2040's goals and implementation actions.
- PSRC should consider biting the bullet and looking at how Vision 2040 implementation might be strengthened if the agency had a larger degree of authority. Perhaps it could at least review large developments (over a carefully defined threshold), which could help insure conformity with the Vision and prevent actions inimical to it.

O-148-012

O-148-013

Other concerns:

As with GMA, the concurrency issue is a weak spot; inclusion of state highways in the program would strengthen it. Additionally we would like to see a greater emphasis on preserving regional utility corridors to continue to provide sewer, water, electricity, natural gas and other utility services.

O-148-014

O-148-015

During the presentation of Vision 2040 to the Municipal League's Issues Committee, committee members articulated concern about the large percentage of population growth projected to go into Snohomish County's unincorporated urban growth area. The fact that 70% of that growth will go into areas affiliated with, and hence to be annexed by, adjacent cities partially addresses those concerns. Yet Snohomish County has few metropolitan and core cities, so the growth in unincorporated urban areas will go into smaller cities such as Lake Stevens (the example given in the presentation), which would seem on the face of it to skew the intent to focus growth into metropolitan and core cities. However, the plan does note the probable need for changing the designation of some cities as growth occurs in them. We believe this issue will need careful monitoring.

O-148-016

Thank you for the opportunity to comment. We have appreciated being part of the process through our representation on the Growth Management Policy Board, and will look forward to the next steps with anticipation.

Sincerely,

Bruce D. Carter, Chair
Municipal League of King County

Cc: Jill Bowman
Susan Hempstead
Lucy Steers

O-148-012 VISION 2040 has addressed this issue, with Part IV: Implementation calling for a State of the Region report that will publish monitoring activities on a regular basis. PSRC will produce additional monitoring reports as well.

O-148-013 Issue best addressed at the local jurisdiction level.

O-148-014 This issue should be developed with the State of Washington.

O-148-015 VISION 2040 was revised to address this issue. See the narrative in the Public Services section.

O-148-016 VISION 2040 assumes that unincorporated areas will be annexed or incorporated by 2040.

O-169

PRKC
Partnership for Rural King County

Response to Puget Sound Regional Council (PSRC) 2040 Vision Draft
September 6, 2007
Prepared by Jennifer Harrison-Cox, jen@prkc.org

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Note: This page of comments does not require a response.

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Introduction

This document has been written in response to the request for public input on the Puget Sound Regional Council's 2040 Vision Draft published in July of 2007.

The 2040 Vision is comprehensive and does an excellent job providing high-level overviews and policy recommendations as designed. It is obvious to the reader that a great deal of thought and expertise has gone into creating the document and supporting material. Some of our comments introduce additional thinking or suggestions for document modification but in general our comments augment 2040 policy guidelines with specifics relevant to community participation implementation.

O-169-001

Thank you for the opportunity to comment on the 2040 Vision draft. We hope the PSRC will take our input to heart and continue to leverage Partnership for Rural King County (PRKC) for public input.

About This Document

Our comments are organized into the three parts of the Vision and provide multi-county planning policy recommendations. When appropriate, sources for additional information have been provided. Additionally, general comments relevant to all the areas of the 2040 Vision are included.

Note that this document is not inclusive of all PRKC membership views and opinions but does highlight aspects of the Vision we think are significant to consider.

About PRKC

Partnership for Rural King County (PRKC) is a grassroots consortium of neighborhood residents, community associations, non-profits, outdoor user groups and educational agencies dedicated to conservation and support of rural communities and surrounding lands in eastern King County located in Washington State.

Our geographic area of focus is the rural unincorporated areas and surrounding incorporated communities of the Snoqualmie Valley including, but not limited to Issaquah, Grand Ridge, Preston, Fall City, Sammamish, North Bend, Snoqualmie, Carnation, Redmond and Duvall.

PRKC supports communities and community members by promoting balance between community, economy and the environment. We facilitate community and organizational networking, planning and resource sharing.

PRKC Shared Values dictate the PRKC Priorities and center around sustainability and local support for:

- Working Forest Land
- Farms
- Outdoor Recreation
- Stewardship

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Environmental Framework

Stewardship as a Cultural Value

The 2040 Vision correctly identifies stewardship as central to sustainability and welfare of the region. While people do not like government telling them what to do, government nonetheless has tremendous influence on individual and corporate perceptions, values and actions.

The 2040 Vision does a thorough job describing the beautiful place in which we live, work and play. Our regional culture unquestionably values the varied outdoor recreation opportunities available here. We believe that PSRC has a responsibility to take the attributes of natural beauty and recreation and leverage them to promote the innate understanding that stewardship is the responsibility of every single person living in our special region. While applicable today, this concept of responsibility will be essential in the future. O-169-002

Stewardship as a responsibility should not be dictated with abrupt policy changes but rather with a subtle philosophical and inclusive approach. If it is assumed that regional residents (including individuals, schools, churches and businesses) need to play a part in stewardship in some form and that message is consistently reinforced and supported with programs, events and opportunities for stewardship, then it will become linked in the minds of residents to our quality of life and outdoor enjoyment. O-169-003

The definition offered for "Stewardship" on page 28 of the 2040 Draft and in the glossary of the 2040 Vision is a fine start. Consider the application of stewardship to be broader than overtly doing things for the environment. Stewardship is also about the choices we make, including choices about consumption and disposal, and about how we use and view the environment. O-169-004

Recommendation:

1. Consider subtle shifts in language and approach to reinforce the responsibility of every resident to play a part in stewardship in the 2040 Vision document and summary publicity communication.
2. Encourage member agencies to do the same in their literature and always specifically identify ways that the target audience can do their part (preferably called out in a side-box with bullets). O-169-005
3. Look for ways for municipalities and agencies to share resources and programs that engage and support the public in meeting their obligations to our region by participating in stewardship at some level and ensuring the public has a voice in establishing policy around stewardship. O-169-006

Conservation Incentives

Conservation/Market Incentives and Transfer of Development Rights (TDR) are identified as ways to improve ecosystem conditions on page 11 of the 2040 Draft. It can not be understated how important these conservation incentives are to overall adoption of conservation approaches. MPP-DP-43 speaks directly to the use of TDR to lessen the pressure on rural lands but we were O-169-007

(Comment continues on following page)

O-169-002 Comment noted.

O-169-003 Comment noted. The concept of sustainability is now woven throughout VISION 2040 as an important thread that ties together the environment, land use, transportation, and the economy as interrelated components that shape our quality of life. The word "sustainability" is now included in the title of the Environmental Framework.

O-169-004 See response to O-169-003.

O-169-005 Comment noted. See DP-Action-9.

O-169-006 The role of VISION 2040 is to establish regional level agreement on issues in order to foster the work of municipalities and agencies. See En-Action-1.

O-169-007 Comment noted. Conservation is an important concept and program supported by VISION 2040. For example, see the added reference to conservation easements and other additions.

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unable to find any clear references to conservation incentives in the policy or narrative sections of the document.

Conservation incentives are different for different types of land owners and users. It is worthwhile to identify and delineate possible conservation incentives by targeted land-owner audience (businesses, churches, schools and individual land owners) as well as by land type. Conservation incentives come in many forms and flavors but the ones that will be broadly leveraged must include economic incentive for the land owner or developer.

Recommendation:

1. Add a narrative and policy section on Conservation Incentives and add the term to the Glossary. Clearly state the objective of conservation incentives as bringing economic or other benefit to the land owner or developer.
2. In the policy section, identify and delineate possible conservation incentives by target land-owner audience: businesses, churches, schools and individual land owners. It would be helpful to jurisdictional policy makers to identify existing programs that may be duplicated in neighboring jurisdictions such as the Timber CUT and PBRS programs in King County.

Endangered Species

As there are Federal and State provisions for endangered species there is questionable need to focus on endangered species at the regional level. It is our observation that, while well intentioned and useful, policy and programs designed to address a single species are expensive and miss the broader need of protecting the ecosystems that provide habitat for a broad range of species, including threatened and endangered species. By the very definition, these plants and animals are rare and consequently often expensive to monitor. There can be public apathy for policies directed at protection of species people are unable to identify and experience.

It is a much more viable strategy to work towards the conservation/protection of intact or even partially functioning ecosystems in this region. Individual species, such as indicator species or even umbrella species, can be a focal point for gathering public support and for evaluating the success of such projects. These species, by contrast, are usually more common and easily identified than are the rarer species. As a result, they are often easier for people to relate to and appreciate.

Recommendation:

1. Identify an agency or resource to develop critical indicator and invasive species lists.
2. Update PSRC policy guideline MPP-EN-10 and MPP-EN-12 or create additional guideline to include developing a list of indicator species as a tool for preserving intact ecosystems and rallying public support.
3. Provide policy guidelines which support monitoring, maintenance and public education of indicator and invasive species. Encourage agencies to share expertise and program information.

Continuation of O-169-007

O-169-008

O-169-009

O-169-010

O-169-011

O-169-008 The specific application of incentives is best addressed in local development regulations.

O-169-009 Comment noted. This issue was considered and not included in VISION 2040. It was determined not to be an appropriate role for PSRC.

O-169-010 Comment noted.

O-169-011 VISION 2040 has added a reference to the threat of invasive species to MPP-En-12.

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Additional resources:
State DNR: http://www.michigan.gov/dnr/0,1607,7-153-10370_22664-60298--,00.html
EPA Watershed Indicator Species: http://www.epa.gov/bioindicators/html/indicator.html
King County Noxious Weed Control Program: http://dnr.metrokc.gov/wlr/lands/weeds/

Important Lands (Identification)

MPP-EN-08 and MPP-EN-11 both describe policy recommendations to identify land to be protected. It would be helpful to give specific guidance for how this may be done. The Trust for Public Land did a very comprehensive unbiased study of King County lands and published the results in a document and set of tools called the King County Greenprint. This document identifies types of land and prioritizes by ecological health, cultural and economic value and connectivity.

O-169-012

Recommendation:

1. Engage the Trust for Public Land to update the Greenprint tools to include the Central Puget Sound region. Leverage the document and tools as an authoritative source for acquisition strategy, recovery strategy, capital programs, regulations and Growth Management Act implementation.

Additional Resources:
King County: http://dnr.metrokc.gov/wlr/greenprint/

RCOs, CDs and Basin Stewards

Not every city has a Resource Conservation Office (RCO) or leverages a Conservation District (CD.) RCOs and CDs provide fundamental resource management, expertise and broader community support and outreach. CDs also serve as a primary resource to rural and unincorporated areas.

While PRKC relies heavily our local Issaquah RCO and the King Conservation District to achieve results, we can unequivocally point to our King County Basin Stewards as our primary resource for guidance when we don't know where else to go. The Basin Stewards know how to navigate policy, are intimately familiar with public and private programs and resources, are able to help us identify technical resources and most importantly are in and respected the community.

Recommendation:

1. Encourage establishment of and tight interagency cooperation between municipal Resource Conservation Offices. — O-169-013
2. Identify Conservation Districts as a key resource for RCOs and rural residents; Encourage all PSRC participating agencies to subscribe to a CD. — O-169-014
3. Call attention to the important role of the Basin Steward as the single and primary person who knows the WRIA and who works with the community to raise awareness, promote stewardship and serve as a community diplomat for County agencies. — O-169-015

O-169-012 Comment noted.

O-169-013 Comment noted. Also, this idea may be considered further after VISION 2040 is adopted. See En-Action-1 (determine PSRC role in environmental planning and coordination).

O-169-014 Comment noted. See En-Action-1 (determine PSRC role in environmental planning and coordination).

O-169-015 VISION 2040 has addressed this issue. A reference to basin stewards has been added to the narrative under Environmental Stewardship in the Environment section.

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Regional Growth Strategy

Community Identity

The 2040 Vision does a very good job describing areas in terms of population density. It also takes steps to identify rural and resource lands as important to future economic health and vitality of the region. We applaud PSRC's identification of community identity as central to regional viability (MPP-EC-15).

The role that healthy community identity plays is perhaps the single most important ingredient of regional vitality. Our area can set itself apart from other regions in the United States, balance growth, develop economic diversity, foster cultural dynamism and stewardship responsibilities and thrive well past 2040 by creating unique and diverse communities. Healthy metropolitan areas and regional communities often have communities with distinct identities that are a rallying point for residents and provide the wider community a sense of pride and ownership. When we think of 1.7 million additional people moving here in the next 20 years, our region has a wonderful opportunity to 1) empower today's residents to define their communities and not become displaced with or fearful of the growth coming (as was the case with the Californian migration of the 1980s); 2) draw new residents to communities which they will best identify with and thrive in; 3) promote cultural and economic diversity within and between communities.

MP-DP-18, MP-DP-19, MP-DP-20 and MP-DP-50 thru MP-DP-59 speak to individual communities and regional centers. MPP-EC-15 is on target but a community participation component is not identified.

Recommendations:

1. Add as a component to the Growth Strategy to stress the importance of community participation in defining themselves. Jurisdictions should work within communities (neighborhoods, cities, rural towns) to create and foster a sense of community identity that is regional in focus but recognizes each community as a unique entity.
2. Encourage county jurisdictions to pass legislation and update property tax codes to ensure long-time residents are not ousted from their communities in the climate of rising property taxes.

Multicounty Planning Policy

Plain Talk

When Governor Gregoire took office, one of her first Executive Orders was for State staff to use plain talk, or common language, in State communication and documentation. This initiative was essentially an open invitation for community involvement and dispelled a lot of distrust of government. In a climate of regional cooperation between jurisdictions, simple, concise language is efficient and will be critical to the effectiveness of policy changes, cooperation initiatives and community participation. The 2040 Draft is well written and easy for lay people to follow and subscribe to – let plain talk in jurisdictional agencies be a legacy of PSRC well past 2040.

Recommendations:

(Comment continues on following page)

O-169-016

O-169-017

O-169-018

O-169-019

O-169-016 VISION 2040 has been revised to address this issue. G-Action-1 calls for an outreach program to communicate to members and the general public.

O-169-017 VISION 2040 has been revised to address this issue. VISION 2040 includes an action that calls for a program to convey the provisions to PSRC members and an education effort to reach out to the general public. See response to O-169-016.

O-169-018 Issue best addressed at the local jurisdiction level.

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1. Emphasize use of Plain Talk as a component of inter-agency cooperation and community empowerment across all policy areas.

Continuation of O-169-019

Additional Resources:
State Plain Talk Initiative: www.accountability.wa.gov/plaintalk
Federal Plain Language Site: www.plainlanguage.gov

Solid Waste

The 2040 Vision Public Services section correctly identifies the importance of recycling to the overall management of volume of garbage. Missing in this discussion are innovative approaches to address our solid waste challenges. Our garbage may be leveraged for economic benefit and used creatively to foster the culture of stewardship described above.

Recommendation:

1. Identify need to look for sustainable alternatives to landfills and regional export of our waste, specifically Waste-To-Energy plants and other technological innovations.
2. Develop local markets for recycled materials by providing conservation incentives to businesses and using local recycled products in government consumption.
3. Provide incentives to retailers to display and promote products that are packaged or made with recyclable materials.
4. Provide incentives and guidance for regional industry and producers to package good for wholesale and retail in the least wasteful way.
5. Evangelize with broad publicity campaigns to consumers the connection between consumption, waste and stewardship.

O-169-020
O-169-021
O-169-022
O-169-023
O-169-024

Additional Resources:
Waste-To-Energy (general): http://www.recoveredenergy.com/d_wte.html, Waste-To-
Waste-To-Energy (local exploration):
http://www.metrokc.gov/mkcc/news/2007/0307/KL_germanytrip.htm

Tools

Several policy recommendations, including MPP-EN-1, MPP-EN-6, MPP-DP-7 and MPP-DP-28 refer to coordination between jurisdictions and use of the best available information at all levels. It may be helpful to further describe the method for accomplishing these huge undertakings. A common subset of information tools is essential for jurisdictions to be able to collaborate and innovate.

Recommendation:

1. Identify common tools as an area to be explored and developed. For example, King County GIS is an invaluable tool for land use research and may be extended to include scientific information needing tracking, such as regional species, water quality, housing targets, population, etc.

O-169-025

O-169-019 Thank you.

O-169-020 This idea is discussed in the narrative.

O-169-021 VISION 2040 supports the use of all markets for recycled materials.

O-169-022 Comment noted. Issue best directly addressed at the local jurisdiction level.

O-169-023 Comment noted. Issue best directly addressed at the local jurisdiction level.

O-169-024 Comment noted.

O-169-025 VISION 2040 has addressed this issue. Several policies and actions call for collaboration, including the development of common tools, within the region.

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Funding

It is great to capture innovative and important strategies and goals for policy. Realizing the policy goals PSRC defines will require money: jurisdictional agencies may require staff; tool development and collaboration will need to be funded; community outreach and engagement costs money. The jurisdictions of our region are not monetarily equal. Without money, great ideas stay ideas and very little will be realized.

Recommendation:

1. Identify funding mechanisms for shared projects.
2. Identify funding resources that participating agencies and organizations can tap into.

Implementation

Accountability

Reviewing, measuring and monitoring progress and compliance using the consistency provisions in the Growth Management Act, state requirements for establishing common regional guidelines, provisions in local comprehensive plans, and directives for coordination in the Regional Council's Inter-local Agreement and Framework Plan is only a start. Strong guidance is necessary but there also must be penalties for not achieving goals, non-compliance or making backward progress.

While the PSRC was founded in the spirit of autonomic partnership and alliance and is voluntary, it is important to consider the possibility that future elected regional officials will not take PSRC recommendations seriously or will delay funding critical programs and projects. Likewise, private entities from corporations to individuals can not be counted on to voluntarily commit to the sustainability principles outlined in the PSRC recommendations.

PSRC must consider accountability and consequence for elected officials and cities that deviate course while claiming credit for participating in the process. PSRC must give guidelines to local governing agencies to ensure that corporations and private residents are held accountable for compliance.

Recommendation:

1. A PSRC Compliance Board made up of members of the public and Council participants should be established to review issues found in measuring and monitoring and to determine appropriate remediation process if necessary.
2. Public disclosure for grievance identified by the Non-Compliance Board issues should be published in newspapers and the PSRC website and should be communicated in letter form to participating executives and mayors and local radio news broadcasters.
3. The Council should consider strong and specific recommendations to county executives to align development and environmental services compliance across county jurisdictions. These recommendations should ensure regulations, support, monitoring and penalties for individual projects to guarantee that they are consistent and supportive of each other across county lines. (This is addressed obliquely in the Critical Areas section but applies to all areas.)

O-169-026
O-169-027
O-169-028
O-169-029
O-169-030

O-169-026 VISION 2040 has been revised to address this issue. See fiscal policies in the General policy section.

O-169-027 This idea was considered in the VISION 2040 process and the language was kept as written.

O-169-028 PSRC will monitor compliance and report the results.

O-169-029 Monitoring reports are available to the public.

O-169-030 VISION 2040 addresses this issue through both its policies and actions. See MPP-G-2 that calls on countywide planning policies to be revised, where needed, to address VISION 2040.

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4. The Council should look for opportunities to support compliance of PSRC policy guidelines with aligned legislative recommendations to be applied in each partnering jurisdiction.
5. The PSRC Compliance Board should strategize ways to recognize municipalities and agencies that meet and exceed Vision 2040 goals with economic and public accolades.

O-169-031

O-169-031 Comment noted. See T-Action-9 and other actions.

O-169-032

O-169-032 Comment noted.

General Comments

Local Local Local!

Global warming, tainted products from overseas and rising oil prices are fueling a paradigm shift in consumption. Public interest and enthusiasm for locally produced products is steadily increasing and will eventually become the norm. Regional municipalities and jurisdictions should identify this trend and seize the opportunity to cultivate the momentum to benefit local economies, stewardship and community identity.

O-169-033

O-169-033 VISION 2040 narrative has been revised to address this issue. See what is now policy MPP-DP-47.

Recommendations:

1. Work with State and regional partners representing manufacturing and agriculture production to develop stable supply, market and retail mechanisms for local goods.
2. Encourage PSRC member agencies to look first for local opportunities when spending public money.

O-169-034

O-169-034 VISION 2040 supports the concept but does not explicitly address it. It is referenced in the discussion of food production in the Development Patterns section and in the recycling discussion in the Public Services section.

Conclusion

In summary, PRKC is very supportive of the goal and policy guidelines outlined in the Vision. We applaud the thought and holistic approach that shaped the document.

Our hope is that our comments illustrate how the importance of public participation can not be understated. There are several areas of the Vision that should be augmented with an approach toward community engagement and ownership. Subtle, direct and concise public outreach is essential. Community identity and soul searching should be nurtured and celebrated. Resources and tools need to be utilized and developed.

O-169-035

O-169-035 Comment noted. See G-Action-1 regarding public outreach.

Good, clear and predictable communication between agencies and jurisdictions, businesses and the public will build trust and foster innovation and ownership. Provisions for policy continuity must be made for changing political climates and agendas. Goals and policies of PSRC must have authority to ensure appropriate participation. Regional municipalities, jurisdictions, businesses and citizens must be held accountable for their participation in shaping the future of our region. Local manufacturing and production for local consumption should be encouraged and developed.

PRKC would like to see the Vision 2040 policies and goals realized. Strong leadership and bold initiative will be required of the Council and member agencies. Know that PRKC supports the Council.

O-169-036

O-169-036 Comment noted.

Thank you again for the opportunity to participate in this important process. PRKC would be happy to provide further clarification and assistance to the PSRC and the Vision 2040 effort. We hope you have found our feedback insightful and helpful.

O-052

August 17, 2007

Norman Abbott, SEPA Responsible Official
Puget Sound Regional Council
1011 Western Ave, Suite 500
Seattle WA 98104-1035

Dear Norman:

On behalf of the Prosperity Partnership's Cultural Taskforce, we are pleased to submit a public comment on the draft VISION 2040 document. We believe arts and culture are distinct and important parts of the central Puget Sound, and should be included in the planning for our region's growth and development.

The economy section of the VISION 2040's multi-county planning policies (MPPs) states, in its overarching goal, that one of the keys to a prospering and sustainable regional economy is the creation of a high quality of life. Furthermore, the MPPs prioritize efforts to attract and retain high-demand employers and employees. A vibrant cultural community – composed of organizations, both large and small, that produce and present a wide variety of media representing broad perspectives and cultures to economically, socially and geographically diverse audiences – addresses both these goals, providing our region with activities, attractions and events that educate, inspire and build community in ways that make the Puget Sound a desirable place to live and work.

While we are fortunate here to have many such organizations, particularly in King County, our region still has work to do compare favorably with peer regions such as the Denver area. In particular, Denver's Scientific and Cultural Facilities District provides a model for increasing access to its cultural organizations, ensuring geographic diversity in their locations and ensuring sustainable public funding for their efforts. Currently, the Cultural Taskforce is working with the Prosperity Partnership's coalition of government, business, labor, nonprofit and educational organizations to finalize and implement a proposal that translates Denver's system to the Puget Sound. This effort reflects the Prosperity Partnership's recognition that arts and culture provide our region with a strategic competitive economic advantage and are essential to our high quality of life.

We request that you add an additional multi-county planning policy to the economy section, reflecting a commitment by jurisdictions and municipalities to properly support and encourage the development of a vibrant cultural community throughout the region.

Thank you for the opportunity to submit this letter, and please let us know if we can provide additional detail on this topic for your consideration. We look forward to your response, and to the recognition of the vital role of arts and culture in our region as part of the final VISION 2040 plan.

Best regards,

Deborah Jensen
President and CEO
Woodland Park Zoo

Stephanie A. Stebich
Director
Tacoma Art Museum

Cultural Taskforce Steering Committee Co-Chairs

O-052-001

O-052-001 VISION 2040 has added policy MPP-Ec-14 to address this issue.

Prosperity Partnership Cultural Taskforce Steering Committee

Deborah Jensen, President and CEO – Woodland Park Zoo
Stephanie Stebich, Director – Tacoma Art Museum
Judy Tuohy, Executive Director – Arts Council of Snohomish County
Susan Sivitz, Managing Director – Bainbridge Performing Arts
David Fischer, Executive Director – Broadway Center for Performing Arts
Barry Smith, Executive Director – Future of Flight
Steve Lerian, Executive Director – Kirkland Performance Center
Bonnie Dunbar, President and CEO – Museum of Flight
Tim Close, Executive Director – Museum of Glass
Bryce Seidl, President and CEO – Pacific Science Center
Bob Cundall, Deputy Director, Finance and Operations – Seattle Art Museum
Kelly Tweeddale, Executive Director – Seattle Opera

Note: This page of comments does not require a response.

O-127

Prosperity
PARTNERSHIP

Prosperity Partnership
Regional Housing Strategy Working Group

September 7, 2007

Dr. Norman Abbott, SEPA Responsible Officer
Puget Sound Regional Council
1011 Western Ave, Suite 500
Seattle, WA 98104-1035

RE: Draft VISION 2040 Public Comment

To Whom It May Concern:

The Prosperity Partnership Regional Housing Strategy Working Group would like to thank the Puget Sound Regional Council for the opportunity to comment on the Draft VISION 2040 growth management, economic and transportation strategy for the central Puget Sound region.

As you know, the Prosperity Partnership is a coalition of over 200 government, business, labor and community organizations from King, Kitsap, Pierce, and Snohomish counties dedicated to developing and implementing a common economic strategy. Its shared goal is two-fold: long-term economic prosperity and 100,000 new jobs for the central Puget Sound region.

The Regional Housing Strategy Working Group is a task force of the Prosperity Partnership's Social Capital and Quality of Life Foundation Initiative. Its members include representatives from a broad array of regional housing stakeholders: non-profit developers and public housing authorities, private developers and real estate professionals, local and state government housing officials and planners, local elected officials, employers, labor, and various non-profit organizations with an interest in housing issues. The Working Group has been tasked with developing a consensus-based set of tools and strategies to promote affordable workforce housing located near job centers throughout the region. These tools and strategies are to be integrated into the Prosperity Partnership's Regional Economic Strategy Action Agenda for 2008-2010. Given our purpose and objectives, this comment letter on the Draft VISION 2040 package shall focus on the housing provisions of the plan.

Housing is a cornerstone of an effective and viable long-range strategic plan for the region. The provision of "a range of affordable, healthy and safe housing choices to every resident in the region" is critical to the success of VISION 2040's other plan elements—environment, development patterns, economy, transportation and public services. So, too, does the success of the Prosperity Partnership's Regional Economic Strategy rely on having an adequate supply of affordable workforce housing located in proximity to major employment centers to support the region's businesses, workers and their families, and sound economic growth.

Note: This page of comments does not require a response.

Comment Letter

The Working Group commends the Puget Sound Regional Council for the thoughtful and substantive package of housing provisions it has put forth in the Draft VISION 2040 plan. In particular, we applaud the PSRC's decision to take on the vitally important role of providing regional guidance, coordination and technical support for local housing efforts. We believe the PSRC's efforts will substantially enhance the region's collective ability to make successful inroads toward meeting its housing goals and improving housing affordability.

We offer the following comments to both endorse specific housing provisions that we strongly support as well as recommend modifications to other provisions that we believe will strengthen and improve the overall VISION 2040 housing element:

Regarding VISION 2040's Housing-Related Multicounty Planning Policies (MPPs):

In general, we feel that the full set of housing-related MPPs (as presented in the Housing and other sections of the MPPs chapter) establish a strong, clear and appropriate set of regional policy goals and guidance to be addressed by countywide planning policies and local comprehensive plans.

- *MPP-DP-7:* We support the new growth targets policy, which calls for a regionally consistent targeting method as well as establishing both housing and employment targets for all local jurisdictions and regionally designated centers. The adoption of residential growth targets as housing units (instead of population) should help to strengthen consistency between the growth target and the housing and land use elements in local comprehensive plans. Furthermore, addressing both housing and employment distribution within a unified targeting process serves to promote a more thoughtful consideration of jobs-housing balance and related policy issues.

- *MPP-DP-35 and MPP-DP-36:* We also strongly support the continued policy emphasis on promoting housing development, including affordable housing opportunities, in centers, along with the new adjunct policy which establishes funding priority for transportation projects and other infrastructure that advance the development of housing in centers. These objectives are wholly consistent with the Prosperity Partnership's desire to increase affordable housing options near major employment centers for the region's workforce.

- *MPP-DP-37:* We believe this policy needs to more explicitly address the affordability component to jobs-housing balance, i.e. accessibility to affordable housing choices for the region's workers at all wage levels, especially lower wage workers. We suggest the policy be revised to better reflect the concept that jobs-housing balance "involves matching the mix of dwelling types and prices in the housing supply with the labor force needs and wages of the jobs base." (Draft VISION 2040, p.49)

Regarding Supporting Text in the Housing Section of the Draft VISION 2040 MPPs Chapter:

In the Housing section of the Draft VISION 2040 MPPs chapter, there is a very nice discussion (on p.50) of what regional and local governments can do to address the region's housing issues, both independently and in partnership with each other.

- *"What Local Governments Can Do":* We feel this passage in the supporting text can be strengthened to better convey the importance of the role played by local governments when it comes to housing and housing production. Local governments possess regulatory control over land use and development. They are key players, both individually and in cooperation with other housing interests, in stimulating various types of development activity. There are a vast number

(Comment continues on following page)

O-127-001
O-127-002
O-127-003
O-127-004
O-127-005
O-127-006

Response to Comment Letter

O-127-001 Thank you.

O-127-002 Thank you.

O-127-003 Thank you.

O-127-004 Thank you.

O-127-005 VISION 2040 has been revised to address this issue. See revised language for what is now MPP-H-1. The housing policies in VISION 2040 are now a separate Housing section. There also is a policy in the Economy section that calls for incentives and investments to create a better jobs-housing balance.

O-127-006 VISION 2040 has been revised to address this issue. The housing policies in VISION 2040 are now a separate section in Part III: Multicounty Planning Policies. Your ideas have been incorporated into the policies and narrative.

of tools and strategies available to local governments to encourage housing diversity and promote affordable housing. While one size does not fit all, many of these tools can be applied in a manner that is tailored to and respective of local markets conditions, community characteristics, and the vision for growth embodied in local comprehensive plans.

Continuation of O-127-006

Regarding VISION 2040's Housing-Related Implementation Actions and Measures:

The critical importance of *implementation* to achieving VISION 2040's stated housing goals cannot be overstated. A good plan will go nowhere without commitment to and follow through on the necessary implementation steps.

- The Working Group strongly urges the PSRC and its Boards to establish the regional housing strategy and plan implementation as a clear agency priority, and to commit the necessary resources to ensure that the full set of implementation provisions is enacted.

O-127-007

A. Comprehensive Regional Housing Strategy

VISION 2040 lays out the basic framework for a regional housing strategy, and we understand that the first part of the "Housing – Supply" Action item (Draft VISION 2040 Appendix 1, p.A-1-4) is intended to represent the next phase of work to further develop and flesh out the regional strategy and implementation plan. The Regional Housing Strategy Working Group utilized a very similar approach to the one proposed in this Action item: of convening a wide cross section of housing interests to develop a viable and well-accepted housing strategy and implementation plan.

- The inclusion of a range of stakeholders in the PSRC process is important to establish broad based support for the final strategy. We encourage the PSRC to create a formal housing advisory group, representative of the region's housing interests, charged with giving advice and monitoring the progress of VISION 2040.

While the Working Group has yet to complete our work, we expect to produce several recommendations (in Fall 2007) that we anticipate will effectively complement, and in many places parallel, what is likely to be contained in the PSRC's comprehensive regional housing strategy. These recommendations include: (a) legislative efforts at the state level to create new tools and funding mechanisms to support and incentivize local affordable housing efforts and reduce the costs of housing, (b) consensus endorsement of existing regulatory and incentive affordable housing tools and approaches that local governments can use to facilitate and stimulate affordable housing production, and (c) an education & technical assistance component to promote the use of existing affordable housing tools and best practices by local governments. (A list of the top strategies that have been identified thus far through the consensus process, as well as the original full list of proposed strategies, are provided as attachments.)

- Given the clear parallels between the Working Group and PSRC's proposed comprehensive regional housing strategy, we urge the PSRC to draw from the Working Group's efforts, to incorporate our recommendations and strategies where applicable, and to otherwise establish a mutually supportive connection between the two processes.

O-127-008

B. Regional Housing Program

In part two of the "Housing – Supply" Action item, VISION 2040 establishes an excellent framework for a regional housing program to encourage and monitor local housing efforts and progress. The Working Group believes that the basic framework identifies all the appropriate elements and priorities for action,

O-127-009

(Comment continues on following page)

O-127-007 VISION 2040 has been revised to address this issue. This concern is now included in H-Action-1. Resource decisions will be made as budgets are developed and adopted.

O-127-008 The Working Group's action agenda will influence VISION 2040 implementation.

O-127-009 Comment noted.

but that it can benefit from a stronger commitment to implementation, greater clarity regarding expectations, and additional detail on how the PSRC might support the various program components.

- To begin, we would like to see the PSRC make a stronger commitment to full implementation of the proposed regional housing program framework. Each of the program components lends an important contribution to the overall effectiveness of the program, producing a whole that is much greater than the sum of its parts. We suggest that the "Housing – Supply" Action language be edited to read that the regional housing program "shall *include* [emphasis added] the following components." The original language reads "shall *consider* [emphasis added] the following components."

- *Local affordable housing targets*: The Draft VISION 2040 language and expectations regarding affordable housing targets are somewhat unclear. Supporting text in the Housing section (Draft VISION 2040, p.51) states that "jurisdictions are to develop affordable housing targets" although there is no MPP that calls for them to do so. Meanwhile, the "Housing – Supply" Action item, as written, merely states that the regional housing "shall consider" affordable housing targets as a program component.

  While the Working Group does not endorse a policy mandate or requirement calling for local affordable housing targets, we do recognize that they represent a valuable policy exercise and planning tool, particularly when established collaboratively between counties and their municipalities based on fair share principles. The PSRC can help to encourage the adoption of affordable housing targets throughout the region by working with its members and providing technical support and guidance for target development. Furthermore, the general issue, as well as specifics about how regional-local coordination on this issue is to be pursued, can be addressed in the comprehensive regional housing strategy.

- *Documentation of local housing strategies:* The Working Group strongly supports this program component which asks local jurisdictions to document their overall housing strategy and its specific provisions. We believe this measure provides an important first step to comprehensively document the full range of actions currently being taken or planned by local jurisdictions throughout the region to meet their growth targets and address housing affordability. With supportive technical assistance and guidance from the PSRC, we believe that the associated reporting requirements can be minimized and streamlined.

- *Technical assistance:* Effective technical assistance from the PSRC will be key to supporting its members in meeting new obligations they are being asked to take on. The regional actions and products called for in the "Housing and Employment Targets" Action (Draft VISION 2040 Appendix 1, p.A-1-4) provide an excellent example of the kind of guidance the PSRC can provide to help its members fulfill a new policy goal and requirement.

  We make the following suggestions as additional examples of what the PSRC can offer in the way of technical assistance: (a) a "model" local housing element based on GMA & CTED guidelines and existing best practices, (b) a "template" for jurisdictions to use to document their local housing strategies and provisions, and (c) research to develop a "short list of highly effective affordable housing tools and strategies" along with guidance on how to tailor these approaches to specific local housing markets.

- *Regional monitoring program:* The final component called for in the regional housing program is a "regional housing monitoring program." There is language in the Draft VISION 2040's

(Comment continues on following page)

Continuation of O-127-009

O-127-010

O-127-011

O-127-012

O-127-013

O-127-010 VISION 2040 has been revised to address this issue. The housing policies in VISION 2040 are now a separate section in Part III: Multicounty Planning Policies. Two housing actions address this concern.

O-127-011 Comment noted.

O-127-012 VISION 2040 has addresses this issue. For example, see H-Action-2.

O-127-013 VISION 2040 has been revised to address this issue. Two actions, H-Action-1 and H-Action-2, address this issue.

Housing section (p.50) indicating that monitoring efforts would entail "[regional] review of local plans," "track[ing] the implementation and outcomes of various housing efforts," and "report[ing] on our region's successes and challenges." It would help to repeat this language in the "Housing – Supply" Action to be clear about what elements of local housing efforts are to be monitored.

When monitoring efforts show that little or no progress is being made toward stated goals, it signals the need to revise a given strategy or program. We suggest that the VISION 2040 provisions on monitoring need additional language that calls for a feedback loop to revisit the "comprehensive regional housing strategy" and implementation plan if the existing approach is not producing measurable success.

Continuation of O-127-013

C. Monitoring and Measures

- Lastly, in Appendix 2 of Draft VISION 2040, we request that the housing-related Performance Monitoring measures (p.A-2-3 and p.A-2-4) be called out under a separate sub-section titled "Housing," rather than included under the sub-section titled "Development Patterns." This would provide titling and content organization that is consistent with how the Implementation Monitoring section is formatted.

O-127-014

In closing, the Working Group would like to reiterate our sincere appreciation to the Puget Sound Regional Council for the superb work it has done in crafting the housing package set forth in the Draft VISION 2040 plan. If fully implemented, along with the recommendations proposed in our comments, we believe that the coordinated regional-local efforts shall be able to make significant progress toward providing affordable housing for all workers and residents in the central Puget Sound region.

Sincerely,

The Prosperity Partnership Regional Housing Strategy Working Group (signed)

Cc: Prosperity Partnership Regional Housing Strategy Working Group Members
Bob Drewel, PSRC
Bill McSherry, PSRC
Carol Naito, PSRC
Eric Schinfeld, PSRC

Attachments: Prosperity Partnership Regional Housing Strategy Working Group Members
Top Consensus Housing Affordability Strategies (tabulated after Meeting #3)
Full List of Proposed Housing Affordability Strategies (developed during Meeting #1)

O-127-014 Comment noted. Housing is now a separate policy section. The monitoring provisions have been brought forward to Part IV: Implementation and housing measures are separate as well.

Prosperity Partnership Regional Housing Strategy Working Group Members

Rita Ryder, Co-Chair
YWCA of Seattle–King County–Snohomish County

Councilmember Julie Anderson
City of Tacoma

Leonard Bauer
Washington State Department of Community, Trade & Economic Development

Bill Block
10-Year Plan to End Homelessness

Connie Brown
Tacoma–Pierce County Affordable Housing Consortium

Mike Crowley
Master Builders of Pierce County

Gene Duvernoy
Cascade Land Conservancy

Hal Ferris
Lorig Associates LLC

Jeanette Henderson
University of Washington Real Estate Office

Alex Johnston
Bank of America

Councilmember Marko Liias
City of Mukilteo

Kelly Mann
Urban Land Institute

Norman McLoughlin
Kitsap County Consolidated Housing Authority

John Purbaugh
Pierce County Planning Commission

June Robinson
Housing Consortium of Everett & Snohomish County

Arthur Sullivan
A Regional Coalition for Housing (ARCH)

Bryan Wahl
Washington Association of Realtors

Heyward Watson
Washington State Affordable Housing Advisory Board

Bill Longbrake, Co-Chair
Washington Mutual Bank

Sam Anderson
Master Builders of King & Snohomish Counties

Rick Bender
Washington State Labor Council

Mayor Carey Bozeman
City of Bremerton

Melanie Brown
Executive Alliance

Bob Drewel
Puget Sound Regional Council

Councilmember Eric Faison
City of Federal Way

David Graybill
Tacoma–Pierce County Chamber of Commerce

Michael Hubner
King County Suburban Cities Association

Steve Leahy
Greater Seattle Chamber of Commerce

Michael Luis
Michael Luis & Associates

Councilmember Richard McIver
City of Seattle

Carla Okigwe
Housing Development Consortium

Adrienne Quinn
City of Seattle Office of Housing

Dale Sperling
Unico Properties

Lyn Tangen
Vulcan Inc.

Stephanie Warden
King County Department of Development & Environmental Services

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Prosperity
PARTNERSHIP

Prosperity Partnership
Regional Housing Strategy Working Group
Report on Consensus Housing Strategies

Overview
In May 2007, the Prosperity Partnership formed the Regional Housing Strategy Working Group, a coalition of representatives from business, government, housing interest groups and developers from both the subsidized and market rate sectors. Chaired by Rita Ryder of the YWCA of King & Snohomish Counties and Bill Longbrake of Washington Mutual, the group was charged with identifying existing areas of broad consensus in regional housing policies and developing strategies and actions that would help to improve access to housing close to jobs for workers of all wage levels from throughout the four-county region. The group met four times over a six month period, and evaluated 26 potential strategies based on whether all five sectors could agree to them, as well as the potential for number of units created, number of jurisdictions affected, impact on low or very low income households, impact on middle income households, impact on non-ownership options, and practical and political feasibility.

DRAFT

Top Consensus Strategies
The most tangible goals of the Working Group were to identify 2-3 specific strategies for the Prosperity Partnership's 2008 Action Items list, the document that sets the priorities for Prosperity Partnership activity in the year ahead. These strategies would be the focus for implementation in the short-term. At the beginning of the process, the Working Group also agreed to select their top consensus strategies based on balance between effect on low income vs. middle income housing. Having carefully considered these criteria, the Working Group has selected the following three strategies to pursue:

1) **Statewide Growth Management Infrastructure Account (GMIA)**: The GMIA would provide funding for local infrastructure projects that help achieve GMA housing goals. Allocation of GMIA funds would be used to incentivize the use of regulatory and other affordable housing tools by local governments.
2) **Sales tax waiver**: A waiver for the state portion of the sales tax on the hard and soft costs of construction and rehab for low income housing projects would reduce the barriers to producing affordable units. Housing authorities currently have an exemption from sales tax, but nonprofit developers do not.
3) **Education and technical assistance on local strategies**: The Prosperity Partnership and the Puget Sound Regional Council would lead the establishment of a regional program to educate local governments about the full range of tools available to them to encourage affordable housing production, and provide technical assistance in developing and implementing local programs. This program will focus specifically on the locally-focused consensus strategies approved by the Housing Working Group, in priority order of implementation starting with **reduced parking requirements**.

Future Action
Because consensus among the represented sectors existed on a number of strategies, the Working Group decided to also include in its final report a list of additional strategies for future implementation, once the top consensus strategies were addressed successfully. More specifically, the Working Group identified two lists – one list of agreed upon consensus strategies for future implementation and one list of strategies that the Working Group needed further research on before deciding whether or not to pursue.

Consensus Strategies for Future Implementation

4) **Reduced parking requirements**: Streamline and reduce parking requirements as a means to bring down the per-unit parking-related costs of a development project. The regulations would be applied as a general rule to all projects within a specified area, regardless of whether the project is associated with the development of low income units.

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5) **Land grants**: Public land grants or sale of parcels at below market value to developers of affordable projects. Parcels may include surplus or underutilized public properties, as well as vacant, abandoned and tax-delinquent private properties acquired through purchase or tax foreclosure.
6) **Density bonuses**: Voluntary incentives that allow developers to build at higher than allowed densities if a specified number or percentage of affordable units are included in the development. Program may be designed to allow developers to contribute to an affordable housing fund in lieu of building the affordable units in their project.

Strategies for Further Research

7) **LIFT / TIF**: Update the existing LIFT legislation, or replace it with a new TIF program with expanded powers and reduced administrative barriers.
8) **Employer assisted housing (EAH) programs**: Employee housing benefits provided by private employers. May include direct support (downpayment or rental assistance) and other types of assistance (home buyer education, rental housing location assistance). Mechanisms to encourage employers to establish EAH programs can include state tax credits and providing EAH program administration via a local nonprofit organization.
9) **Regional transfer of development rights (TDR) program**: A regional program that would coordinate/administer the transfer of development rights from sending areas to preserve specified parcels from redevelopment (e.g. low income housing, buildings with high historic value, rural parcels, open space, etc.) to eligible receiving areas where development rights may be purchased and applied as additional density allowances.

Implementation

In order to accomplish these goals, the Working Group recommends the creation of three taskforces, composed again of representatives of each of the five sectors. These taskforces will be as follows:

Legislative Action Taskforce

This group will focus its efforts on passage of legislation at the state level. In the short term, the creation of a statewide Growth Management Infrastructure Account will be this group's top priority. The legislative action taskforce will be responsible for working with local and statewide organizations who support this proposal to build and coordinate support, as well as handle communication with the Governor and state legislators during the legislative session in Olympia.

Local Implementation Taskforce

This group will be responsible for working with government, business and community organizations to encourage the adoption of the strategies that involve local jurisdictions. This work may require both the recommendation for statutory changes that will allow new strategies to be implemented, as well as education and technical assistance to local planners and elected officials on already existing tools that they can use to improve housing affordability. For the latter effort, this group will help to develop a formal education and technical assistance toolkit, with information about the consensus strategies that the group discussed and ways to utilize them.

Research Taskforce

This group will be responsible for reviewing and providing guidance on further research on the three strategies that the Working Group requested additional information on: tax increment financing, employer assisted housing and regional transfer of development rights. The research will include not only the specific details and potential impacts of these strategies, but also what legislative and/or statutory changes might be required to enact these strategies and what the political feasibility of these strategies would be. In addition, the group will work with the Local Implementation Taskforce to identify research necessary for the creation of the education and technical assistance toolkit.

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Consensus Housing Affordability Strategies (revised)

As discussed in the *Prosperity Partnership Regional Housing Strategy Working Group Guidelines* document, participants will be working from a consensus list of housing affordability strategies to identify specific items to incorporate into the Prosperity Partnership's 2008 Action Items agenda. Below is the strategy list, with each strategy is coded according to implementation responsibility:

- L = local
- R = regional
- S = state
- L/S = both state and/or local
- P/N = private and/or nonprofit organizations

These are the 13 original proposed strategies:

Streamline development regulations and processes:

1. Simplify and standardize regulations and processes across local jurisdictions: *Examples include standardizing local permitting processes, design guidelines, road standards, small lot regulations, application processing software, etc. (See Governor's Task Force – Planning Tools Recommendation #1, p.8 and CHP's Increasing the Availability of Affordable Homes Policy #5, p.5)* **[L]**
2. Streamline SEPA requirements: *Encourage upfront "planned action" SEPA environmental review for appropriate planning areas, such as urban growth centers, to allow SEPA exemptions for qualified projects in those areas; explore relaxing threshold requirements for SEPA exemptions; fund the Planning and Environmental Review Fund (PERF) as incentive for local governments to do upfront SEPA reviews. (See Governor's Task Force – Planning Tools Recommendation #2, p.8)* **[L]**

Reduce impact fees and other development costs:

3. Revise impact fee structures: *Replace fixed per-unit impact fees with a fee structure that charges proportionately to the square footage of a home or condominium unit. (See CHP's Increasing the Availability of Affordable Homes Policy #6, p.6)* **[L]**
4. Make publicly owned land and vacant or abandoned tax-delinquent properties available for affordable housing: *Land grants can be a powerful alternative to direct funding as a means to support the development of affordable housing. (See CHP's Increasing the Availability of Affordable Homes Policies #1-2, p.1-2.)* **[L]**

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Incentivize (through funding and other mechanisms) local plans, zoning and programs that encourage housing affordability and diversity:

5. Eliminate the "replacement rule" for low-income housing impact fee exemptions: *Local jurisdictions must currently pay from public funds to replace low-income housing impact fee exemptions. (See Governor's Task Force – Funding Recommendation #5, p.7)* **[S]**
6. Create a Growth Management Infrastructure Account (GMIA): *The GMIA would fund local infrastructure projects that help achieve statewide GMA housing affordability goals. (See Governor's Task Force – Funding Recommendation #2, p.6)* **[S]**
7. Reprogram existing state grants and loans to support/encourage affordable housing: *Relevant state grant and loan programs include the Public Works Trust Fund (PWTF), Transportation Improvement Board (TIB) funding, Community Economic Revitalization Board (CERB) funding, and the Job Development Fund. (See Governor's Task Force – Funding Recommendation #2, p.5)* **[S]**

Utilize new, expanded or existing tools for local governments:

8. Update the state's local infrastructure financing tool (LIFT) legislation: *Update the LIFT legislation so that it is more closely tied to achieving statewide GMA housing affordability goals. (See Governor's Task Force – Funding Recommendation #6, p.7) Remove the current limit on establishing more than one revenue development area (RDA) in each county? Simplify LIFT implementation requirements?* **[S]**
9. Expand the state's multifamily tax abatement program: *Allow cities to use this tool for development on smaller lots; allow cities to retain the state's 20% of taxes collected during the abatement period for small lot programs. (See Governor's Task Force – Planning Tools Recommendation #4-5, p.9) Expand the program to smaller cities? (See Pierce County's Task Force Report, p.23)* **[S]**
10. Preservation of affordable rental units: *Tools and approaches include preserving units scheduled to lose federal subsidies, providing low-interest rehabilitation and maintenance loan programs to non-subsidized property owners, limiting condominium conversions, etc. (See CHP's Increasing the Availability of Affordable Homes Policy #18, p.18)* **[L/S]**
11. Inclusionary zoning requirements and incentives: *Mandatory requirements or voluntary incentives for developers to include a specified number or percentage of affordable units in a given development or contribute to an affordable housing fund. (See CHP's Increasing the Availability of Affordable Homes Policy #11, p.11)* **[L]**
12. Density bonuses: *Voluntary incentives that allow developers to build at higher than allowed densities if a specified number or percentage of affordable units are included in a given development. (See Pierce County's Task Force Report, p.59-60)* **[L]**
13. Employer Assisted Housing (EAH) programs: *Employers in strong housing markets are increasingly concerned about how the high cost of housing affects their ability to recruit and retain workers. Employers have instituted a creative array of approaches to supporting both renters and first time homeowners in obtaining affordable housing and locating in proximity to work. (See CHP's Increasing the Availability of Affordable Homes Policy #17, p.17)* **[P/N]**

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These are the 13 additional strategies proposed by Working Group participants:

14. Promote performance zoning *(proposed by Stephanie Warden, King County DDES)* **[L]**
15. Promote innovative small lot zoning regulations, such as allowing single family property owners to build and sell off an accessory dwelling unit *(proposed by Leonard Bauer, CTED)* **[L]**
16. Encourage mixed income joint development efforts between market-rate and subsidized developers *(proposed by Hal Ferris, Lorig Associates)* **[P/N]**
17. Eliminate Low Income Housing Tax Credit (LIHTC) administrative barriers to joint development efforts *(proposed by Hal Ferris, Lorig Associates)* **[S]**
18. Streamline regulations to promote adaptive reuse *(proposed by Hal Ferris, Lorig Associates)* **[L]**
19. Make underutilized publicly owned properties available for low-income housing developments *(proposed by Carla Okigwe, HDC)*; develop a regional inventory of eligible properties to support this effort *(proposed by Bob Drewel, PSRC)* **[L]**
20. Ensure that a regional transfer of development rights (TDR) program is compatible with housing affordability goals *(proposed by Gene Duvernoy, Cascade Land Conservancy)* **[R]**
21. Encourage flexible zoning regulations that allow for case-by-case variances for affordable housing developments *(proposed by Michael Luis, Michael Luis & Associates)* **[L]**
22. Encourage local jurisdictions to adopt planning measures/policies (20-year housing targets, jobs-housing balance, housing diversity, no-net loss) as well as development regulations (SEPA exemptions for projects up to 20 units, short plats up to 9 lots, accessory dwelling units, lots size averaging, cottage housing, cluster developments) that promote development of affordable housing *(proposed by Bryan Wahl, Washington Association of Realtors)* **[L]**
23. Create a regional housing fund to incentivize and support local efforts to promote housing affordability and diversity *(proposed by Norman Abbott, PSRC)* **[R]**
24. Reduction in parking requirements (especially structured parking requirements) for multifamily buildings serving people at or below 30% median income, perhaps also at 30%-50% of median income *(proposed by Carla Okigwe, HDC)* **[L]**
25. A new or revised Tax Increment Financing (TIF) program that would require 25% of the expenditures within an improvement district be used to create low income housing *(proposed by Carla Okigwe, HDC)* **[S]**
26. Waiver of sales tax on hard and soft costs of construction and rehab of low income housing. Housing authorities have an exemption from sales tax, but nonprofit developers do not. *(proposed by Carla Okigwe, HDC)* **[S]**

Note: This page of comments does not require a response.

Resources

In preparation for these meetings and throughout the process, participants should feel free to use the following resources to inform their work:

1) Growth Management/Housing Task Force *Report to State of Washington Affordable Housing Advisory Board*
   - http://www.cted.wa.gov/DesktopModules/CTEDPublications/CTEDPublicationsView.aspx?tabID=0&ItemID=3709&MId=870&wversion=Staging

2) Center for Housing Policy's *Increasing the Availability of Affordable Homes: A Handbook of High-Impact State and Local Solutions*
   - http://www.nhc.org/pdf/pub_hwf_solutions_01_07.pdf

3) *Final Report and Recommendations* from the Pierce County Housing Affordability Task Force
   - http://www.co.pierce.wa.us/xml/services/home/property/pals/landuse/housing affordability final report.pdf

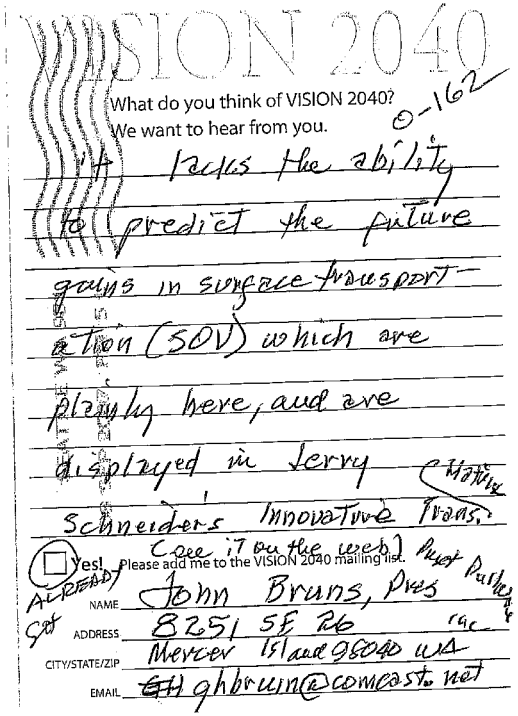
4) Puget Sound Regional Council's *VISION 2020 + 20 Update Issue Paper on Housing*
   - http://www.psrc.org/projects/vision/pubs/housing.pdf

5) Housing Development Consortium's *The Future of the Field Report*
   - http://www.housingconsortium.org/resources/documents/Trends%20affecting%20housing%20in%20KC.ppt

6) King County's *10 Year Plan to End Homelessness*
   - http://www.cehkc.org/plan-final.shtml

7) King County Growth Management Planning Council's *"Housing Toolkit"*
   - http://www.metrokc.gov/ddes/gmpc/housing/hsg_toolkit.shtm

Note: This page of comments does not require a response.



VISION 2040

What do you think of VISION 2040?
We want to hear from you.

O-162

It lacks the ability to predict the future gains in surface transportation (SOV) which are plainly here, and are displayed in Terry Schneiders Innovative Trans. (see it on the web) Must Public

Yes! Please add me to the VISION 2040 mailing list. ALREADY got

NAME John Bruns, Pres

ADDRESS 8251 SE 26 rec'd

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O-162-001

O-162-001 Comment noted.

O-131

Regional Design Team
c/o John Owen
MAKERS architecture and urban design
1425 4th Avenue Suite 901
Seattle, Washington 98101

Mr. Norman Abbott
PSRC
1011 Western Avenue
Suite 500,
Seattle WA, 98101

Dear PSRC Policy Board Members, Staff Committee Members and Staff:

On July 26, 2007, the Puget Sound Regional Design Team, a volunteer group working to provide a design perspective in the VISION 2040 planning process, conducted a work session to discuss the Draft VISION 2040 documents and frame comments regarding it. Eighteen professional planners, designers, and interested parties attended. Below are listed comments and suggestions for actions and policies prepared from notes from that session.

Top Three Issues

The group identified the top three design related issues facing the region:

- Move more people with fewer vehicles over shorter distances, thus promoting housing opportunities near workplaces and more transit options for efficient regional travel.
- Ensure that centers of all scales are high quality living environments which promote pedestrian and bicycle travel.
- Create green stretches to separate communities, perform ecological functions, link landscapes and enhance the region's character and identity.

These issues framed many of the specific comments and recommendations described below.

Integration of Planning Elements

We applaud your efforts to integrate the various planning elements as illustrated in the policy approach diagram on page 24 of the Draft VISION 2040[1]. The success of VISION 2040 will depend on achieving this integration.

O-131-003
O-131-001
O-131-002
Continuation of O-131-003
O-131-004

[1] http://psrc.org/projects/vision/pubs/draftV2040/V2040.pdf

O-131-003 Comment noted. See existing open space provisions.

O-131-001 VISION 2040 has been revised to address this issue and includes additional provisions related to jobs-housing balance.

O-131-002 VISION 2040 has been revised to address this issue with revisions to the provisions that address centers.

O-131-003 (continued) See response to previous O-131-003.

O-131-004 Thank you.

The Transportation Element Should Be More Visionary and Better Defined

The Draft VISION 2040 and Supplemental DEIS are status quo regarding the issue of transportation. It looks from figure 2.8, on page II.29 of the SDEIS[2] transportation section, as if the mode splits and accessibility standards change very little between the 2000 baseline and the preferred growth alternative. The design team feels that VISION 2040 maintains the transportation status quo and is not visionary enough. Because the Puget Sound Region is currently significantly deficient in transit options available to citizens in other regions, VISION 2040 should more boldly change transportation priorities: the VISION should promote substantial increases in all types and scales of local, regional, and high-capacity transit in a variety of forms, and it should indicate specific examples of how the region's transportation systems will evolve to become more transit, pedestrian and bicycle oriented. The draft is relatively silent on how land use and transportation will be integrated. While some of the policies MPP-T-9 and 10 begin to address this issue, there is little supporting discussion of its importance and no actions to move the region forward regarding new development models and transportation systems.

One way to better integrate land use and transportation in VISION 2040 is to include the term "transit oriented development" in the multicounty planning policy language. The sidebar on page 67 of the Draft VISION 2040 addressing transit oriented development is appreciative and supportive of the concept, and we recommend taking additional steps. It is important to include the term transit oriented development in the policy language because as a concept, transit oriented developments will continue to evolve in urban contexts throughout the country and including it in our 2040 policy language will tacitly acknowledge our region's participation in and advocacy of that ongoing evolution. We recommend changing MPP-T-24 to read as follows (although the concept of transit oriented development could easily be added to any number of other multicounty planning policies in that subsection):

> *Target transportation investments into areas that have or are planning for transit-supportive densities or transit oriented development.*

Mode split and appropriate trip reduction goals and level of service standards and other criteria aimed at reducing dependence on single occupant vehicles should be adopted in the VISION 2040 plan; please consider the following policy:

> *As part of VISION 2040 implementation, adopt objectives and principles to transform the region's current dependence on single occupancy vehicle transportation to a sustainable transportation system: a genuinely balanced multi-modal system with significantly increased transit and non-motorized facilities and services that can appropriately guide the Destination 2030 update.*

Also, the lack of attention to redeveloping linear land use patterns along transportation systems highlights the need to better address this issue at the regional level. Design can really help in this regard, and we encourage you to incorporate Strategy 3 from the Regional Design Strategy: "Redevelopment

[2] http://psrc.org/projects/vision/pubs/sdeis/SDEIS%20Chapter%202.pdf

(Comment continues on following page)

O-131-005
O-131-006
O-131-007
O-131-008
O-131-009
O-131-010

O-131-005 VISION 2040 has been revised to address this issue, with stronger policies and narrative. Also, the Destination 2030 update will provide an additional opportunity to further address this issue. The Transportation section now has a subsection entitled "Sustainable Transportation" that includes policies that address transportation and the effects of emissions. See the new provisions and new policy MPP-T-24 that are related to alternatives to driving alone.

O-131-006 Implementing VISION 2040 will require increases in transit service. The Destination 2030 update will add detail regarding types and funding.

O-131-007 VISION 2040 has been revised to address this issue.

O-131-008 VISION 2040 was revised to address this issue.

O-131-009 VISION 2040 was revised to include a policy to address alternatives to driving alone (see MPP-T-24).

O-131-010 VISION 2040 has been revised to address this issue.

Opportunities – recycling Existing Urban Areas." This Strategy, along with models and examples for redeveloping lands along transportation systems, can be found on page 51 of the Regional Design Strategy[3]. Language from this strategy could be used to strengthen the land use discussions in the Draft VISION 2040's Development Patterns section or the Transportation section.

Please consider including an action (in Appendix 1[4]) to conduct a study to explore new models and examples for redevelopment of linear land use patterns (strip corridors along highways and arterials.) Please see recommendation #12 on page 74 of the Regional Design Strategy.

Please consider the following policy:

> *Incorporate community development re-investment strategies in major transportation projects and include funding and resources for community development planning and design as part of PSRC's project grant funding formulae.*

This policy mirrors the "context sensitive design" approach discussed in the transportation section and there are some emerging examples such as the LRT line on Martin Luther King Way and SR 99 in Shoreline that indicate how successful such an approach can be.

Transportation as an Economically Competitive Advantage.

The Economic section of the Draft VISION 2040 should make the point that transportation for people and freight can be leveraged as an important competitive advantage. Our region competes globally with places with comprehensive multimodal transportation systems where people have options other than the single occupancy vehicle to get to work, such as transit, walking, or bicycling. If we can lower transportation costs, including infrastructure investments as well as vehicle trip costs, we can better compete economically in the global arena. Therefore, land use patterns and communities designed to reduce transportation needs will help us compete; but the current transportation section of the Draft VISION 2040 remains too focused on roads and highways. Livable, walkable communities should be part of the Prosperity Partnership strategy as well.

The VISION 2040 Document Should Explain How the Anticipated Growth Patterns will create Viable Communities.

The Draft VISION 2040 describes where the growth will go but not how growth will go. Some sort of graphics and text should provide illustrative examples for different kinds of communities of the kinds of changes that could take place to accommodate projected growth. For example, what kind of development will need to occur near the urban growth boundaries to accommodate the growth projected there? What will it look like? How can we create a coherent development pattern and community

[3] http://www.psrc.org/projects/vision/pubs/designstrategy.pdf

[4] http://psrc.org/projects/vision/pubs/draftV2040/V2040%20Appendix%201.pdf

(Comment continues on following page)

Continuation of O-131-010

O-131-011

O-131-012

O-131-013

O-131-011 Comment noted.

O-131-012 VISION 2040 includes two new policies to address this issue.

O-131-013 The charts, maps, tables, illustrations, and other graphics have been reworked for accuracy and readability. Additional detail is also provided in the FEIS. Also, the narrative in Part II: Regional Growth Strategy has been expanded to clarify the purpose of regional geographies and to provide detail concerning the distribution of growth. Finally, an action has been added to develop an outreach program.

structure? Some specific examples could prove to be useful, for example: how could development pressure for increased heights be accommodated in Kirkland; will early 20th century design be continued for new development?

Physical Image and Regional Identity

We commend you for including the Urban Design section and its goals and policies. There should also be an acknowledgement of the region's unique identity and how we can maintain and enhance it. The Draft VISION 2040 does include policies that address the physical characteristics of the area, but the larger issue of how the physical elements work to create an identity that includes social, economic and cultural factors is also important. Language from page 21 of the Regional Design Strategy discusses the cyclical and mutually supportive relationship between the following:

- Complex social, economic, historic and cultural factors that make up a sense of the region's character or identity
- Local, on-the-ground implementation of policies and strategies which lead to the physical elements of our regional environment

The design policies provide a solid foundation for guiding other topics in their subsection, so we also recommend changing the title in the subsection in Development to "Elements of Orderly Development **and Design**" and moving the design policies (DP-50 through DP-59) to the front of the subsection. In addition, regional design should be perceived as applicable to urban and rural areas equally, so the set of Design Policies might more appropriately be named "Regional Design" rather than "Urban Design." It could be clarified in the narrative that the design policies are applicable to all of the regional geographies and land uses mentioned earlier in the chapter, and are not specific to any one geography or land use. The narrative could also be enhanced at the beginning of the subsection by stating how design is an important factor that enables the region to grow strategically, gracefully, and efficiently and thus, can offer a multi-faceted contribution to quality of life in the region.

Development on the Edges of Urban Growth Areas

While the draft does assume that unincorporated urban areas in the UGA will be incorporated into municipalities, in many cases it is clear that development prior to incorporation will result in disorganized land use patterns with little cohesion or sense of community. The region desperately needs to ensure that new development in unincorporated urban areas is designed to be as efficient as possible in keeping with the proposed in the Regional Design Strategy. This is an important design and community planning challenge and the Regional Design Strategy identifies it as a critical issue (as part of Strategy 6 in Chapter 4, see page 65).

Please consider adding the following action to Appendix 1:

> *Conduct a regional study to define local policies and regulations that can lead to more viable mixed use communities in unincorporated urban areas within the UGA.*

This study might be similar in scope to the Rural Town Centers and Corridors Study.

Continuation of O-131-013
O-131-014
O-131-015
O-131-016
O-131-017
O-131-018
O-131-019
O-131-020
O-131-021

O-131-014 VISION 2040 has been revised to address this issue.

O-131-015 Comment noted.

O-131-016 VISION 2040 has been revised to address this issue.

O-131-017 VISION 2040 has been revised to address this issue.

O-131-018 VISION 2040 has been revised to address this issue.

O-131-019 VISION 2040 has been revised to address this issue.

O-131-020 VISION 2040 has been revised to address this issue.

O-131-021 VISION 2040 has been revised to address this issue. See the revision to regional design best practices in what is now DP-Action-10 in the final document.

Please consider adding the following policy to VISION 2040:

> *In the review of countywide planning policies, and local comprehensive plans, encourage local governments to design urban unincorporated areas within urban growth areas as efficiently as possible, striving for coherence between development in these areas and the areas to which they will eventually be incorporated.*

The draft policy MPP-DP-23 begins to address this issue, but the proposed policy is more directly aimed at orderly development and incorporates PSRC's responsibility to review comprehensive plans. Currently, it is possible for an unincorporated potential annexation area within the UGA to have non-urban road and design standards. Revisions to VISION 2040's MPPs and actions should encourage or assist counties in adopting urban design standards in unincorporated urban areas within the UGA that have the potential to be annexed to an adjacent municipality.

O-131-022 VISION 2040 has been revised to address this in the narrative, although a new policy was not added.

Relationship to Statewide Objectives and Benefits

It would be useful to explain how VISION 2040 fits with State's objectives as a way of showing how the region contributes to the entire state and why it is important to fund infrastructure, especially that which is of statewide importance.

O-131-023 VISION 2040 has been revised to address this issue.

Coordinated Open Space Planning

We strongly support the action to prepare a regional greenspace strategy and urge PSRC to take an active, if not leadership, role in its development. The Draft VISION 2040 should go on to justify provisions for open space on all scales (from regional greenbelt systems to neighborhood pocket parks) as the necessary means to provide equal access for all to relief from the resultant increased density in the preferred alternative. A concise definition of open space, as follows, could be used: Open space is divided into six participating elements: management of resource production (forestry, agriculture); preservation of natural and human resources; public safety; outdoor recreation; shaping urban growth by providing defining boundaries and buffers around communities; and sustenance of the health, welfare, and well-being of the region's citizens. In addition, we recommend taking language from Strategy 2: Create a Green Open Space Network in Chapter Four of the Regional Design Strategy (page 47).

O-131-024 Comment noted.

O-131-025 VISION 2040 has been revised to address this issue.

O-131-026 VISION 2040 has been revised to address this issue, with a description of open space included in the narrative.

O-131-027 See response to O-131-026.

Redevelopment of Urbanized Estuaries.

Please consider including the following action:

> *Conduct a pilot study for an estuary restoration and redevelopment plan to test the application of new restoration methods and collaborative redevelopment efforts.*

This study would follow on the industrial land inventory called for in the draft. There are numerous small projects and local efforts to restoring the region's urban estuaries that would greatly benefit from the regional perspective that PSRC could bring. The Shel-sheb estuary at the south end of Bainbridge Island, built by WDOT as a mitigation measure, could be used as an example. Another recent model that could be used for this study is the agreement between the Environmental Protection Agency and multiple agencies (including Boeing, the City of Seattle, the Port of

O-131-028 VISION 2040 has been revised to address this issue. See new action in the Environment section.

(Comment continues on following page)

Seattle and King County) to work on a large scale project to restore the lower Duwamish River[5]; large inter-jurisdictional efforts of this nature could be the basis for a region-wide study to examine the balance between the restoration of key estuaries and the preservation of vital industrialized lands. (Additional examples are listed in the Regional Design Strategy Compendium.)Because such an effort would necessarily integrate environmental restoration with economic development and land use planning, it would embody three of VISION 2040's areas of emphasis and provide a case study for PSRC's involvement in these issues.

Green Building and Low Impact Development Practices

Please consider adding the following policy.

> *Encourage the advancement and utilization of development and building practices that reduce adverse impacts to the environment.*

Several draft policies address parts of this objective but a strong statement such as the one above is important. Possible PSRC activities to advance green building practices should be considered in assessing its role in environmental planning and management. We strongly support the action calling for the preparation of a Sustainable Practices Toolkit.

Environmental Fairness Across Geographies.

Please consider the following policy:

> *Ensure that the responsibilities and benefits of implementing the provisions of this growth management strategy are shared equitably between all communities, groups, economic sectors and areas within the region.*

VISION 2040 Implementation: Puget Sound Regional Council's Role in Growth Management

Participants at the July 26 Regional Design work session noted that PSRC has an opportunity to increase its effectiveness in achieving growth management objectives. There is a critical need for a regional leader of substantive political stature to direct a regional design program. VISION 2040 should include, as part of its Implementation chapter, language from the Regional Design Strategy which recommends both a Regional Design Program and an enhanced role for PSRC in regional design[6], including:

- Increase PSRC's data collection and management activities to include environmental, economic development, and design related information.
- Increase PSRC's educational function in issues of regional design.
- Provide greater design assistance to local governments.
- Take a more active leadership role in regional design activities that local, county and state governments are less able to initiate.

[5] The Duwamish: River of Possibility. Seattle Times Editorial by Ryan Blethen, August 12, 2007

[6] See Pages 69-71 of the Regional Design Strategy

Continuation of O-131-028

O-131-029

O-131-030

O-131-031

Continuation of O-131-030

Continuation of O-131-029

Continuation of O-131-030

O-131-029 VISION 2040 has been revised to address this issue. See revised policy in the Environment section.

O-131-030 Comment noted.

O-131-031 VISION 2040 narrative has addressed this issue.

O-131-030 (continued) See response to previous O-131-030.

O-131-029 (continued) See response to previous O-130-029.

O-131-030 (continued) See response to previous O-131-030.

In addition to the comments from the July 26 work session noted above, the Puget Sound Regional Design Team encourages PSRC to establish a Regional Design Program as described in Chapter 5 of the Regional Design Strategy. The development of a Best Practices Toolkit as indicated in the Orderly Development - Regional Design action in the Draft VISION 2040 is a good start, but an established regional design program would provide PSRC with an important resource for implementing VISION 2040. It is important to point out that a regional design program would not focus solely on physical *design* issues but would rather serve as a catalyst to integrate core objectives including land use and transportation integration, ecological restoration and redevelopment planning and strategies to strengthen livable communities, transportation access, and affordable housing. The real benefit to PSRC would be regional design's ability to integrate various elements, as noted in the bubble diagram on page 24 of the Draft VISION 2040, and to connect policy level decisions to on-the-ground results.

O-131-032

Before closing, we would like to express our appreciation to the Board, Committee and staff for your support in the Puget Sound Regional Design Team efforts, especially in providing the opportunity to work with Rocky Piro. His guidance regarding the VISION 2040 process, not to mention his professional and creative contributions helped the group immeasurably in providing what we hope is effective input.

We also appreciate the opportunity to comment on the Draft VISION 2040 and hope that these comments are helpful to you. If you have any questions, please do not hesitate to contact us through:

Dennis Ryan: Tel: (206) 5438293, email: frango@u.washington.edu,
John Owen: Tel: (206) 652-5080, email: johno@makersarch.com, or
Talia Henze: Tel: (206) 505-3400, email: talia.henze@bhcconsultants.com

On behalf of the Puget Sound Regional Design Team,

John Owen
Makers Architecture

Dennis Ryan
University of Washington

Talia Henze
BHC Consultants

Roger Wagoner
BHC Consultants

O-131-032 VISION 2040 has been revised to address this issue. See action on regional design.

The following is a list of Puget Sound Regional Design Team Participants during the work session on July 26, 2007 to discuss the Regional Design Strategy and the Draft VISION 2040 documents. These discussions provided the basis for the comments in this letter.

Participants:

Stephen Antupit	Mithun
Geoff Appel	Reid Middleton
Dave Boyd	City of Bothell
Bob Cornish	Interested Citizen, Retired Planner
Marty Curry	University of Washington
John Eskelin	Interested Citizen
Rob Garwood	City of Sammamish
Greg Hill	Streeter Architects
Ikuno Masterson	ESA Adolfson
Sara Nikolic	Futurewise
John Owen	Makers Architecture
Dennis Ryan	University of Washington
Karen Stewart	Reid Middleton
Ron Turner	Retired Planner and University Teacher
Roger Wagoner	BHC Consultants
Janet Wright	Reid Middleton

Presenter: Rocky Piro	PSRC
Presenter: Talia Henze	BHC Consultants (Formerly with PSRC staff)

Note: This page of comments does not require a response.

DRAFT VISION 2040 COMMENTS

O-116

Sierra Club, Cascade Chapter
180 Nickerson Street, Suite 202, Seattle, WA 98109

The Sierra Club appreciates this opportunity to provide comments to the Draft Vision 2040 document. These comments are tempered by the Cascade Chapter's strong conviction that the overriding long-term global and regional issue is the need for strong action to mitigate the release of greenhouse gases into the atmosphere and to adapt to the regional consequences of global climate change. We also want to thank and acknowledge the staff of the PSRC for their recognition of the central role the environment plays in all aspects of the Vision, and the importance of protecting this valuable resource as the Puget Sound region grows. We share the PSRC's recognition in its letter of transmittal of "the need to integrate land use, economic development, transportation, and environmental planning to support a successful region." Indeed, we do not see how else the region can achieve its climate change mitigation and adaptation responsibilities. We also share the view that the region needs to be proactive in anticipating and addressing potential problems. As we are now learning, it is much more expensive and difficult to clean up the environment than to avoid polluting in the first place. To put it bluntly, we can't afford to wait.

O-116-001

Prior to our substantive comments, we recommend an administrative change: listing as GMPB participants the organizations and associations who have played a significant role in the shaping of the Vision. This list would include the Sierra Club, Futurewise, the League of Women Voters, the Realtors Association of Washington, the Master Builders Association and any others we may have missed. Currently, only elected officials from the participating jurisdictions are listed. Our proposed change will communicate to the public the many voices that have shaped the Draft Vision.

O-116-002

Finally, as an overarching comment, we want to convey our appreciation to the GMPB for the greater emphasis on environmental protection and improvement than was found in earlier versions of the document. We are particularly pleased with the inclusion of the section on the environmental framework as a lead discussion, both for the emphasis on the topic and for its statement of one of the central goals: to "restore and sustain the environment." Unfortunately, this section, though descriptive, is not used to shape explicitly the remaining sections of the document. Indeed, the detailed annotations on John Owens' three evocative diagrams suggest quantitative findings and substantial policy recommendations that simply do not appear later. A much stronger approach would be to set explicit regional environmental policy goals related to climate change, Puget Sound restoration, livability, green space, habitat, and so on, and then to provide quantitative objectives that reflect the ability of the region to sustain its environmental health in response to the pressures of growth. The name of this section might be changed to "Sustainability Framework."

O-116-003

O-116-004

COMMENTS ON ENVIRONMENT, DEVELOPMENT PATTERNS, ECONOMY, PUBLIC SERVICES:

1. After each set of Overarching Goals and Policies, there should be the inclusion of and greater emphasis on:
   - Strategies for reaching each goal
   - Action steps for implementation of each policy
   - Benchmarks
   - Monitoring and Measurement to gage progress on strategies and achievement

   The Vision should clearly spell out those policies and strategies for accomplishing the environmental goals.

O-116-005

(Comment continues on following page)

O-116-001 VISION 2040 was revised to more fully address climate change.

O-116-002 VISION 2040 will give credit to the many members, organizations, and others who contributed to the effort.

O-116-003 Thank you. The concept of sustainability is now woven throughout VISION 2040 as an important thread that ties together the environment, land use, transportation, and the economy as interrelated components that shape our quality of life. In addition, the charts, maps, tables, illustrations, and other graphics have been reworked for accuracy and readability.

O-116-004 VISION 2040 has been revised to address this issue. The Framework's title has been revised. The concept of sustainability has been moved forward and is now woven throughout VISION 2040 as an important thread that ties together the environment, land use, transportation, and the economy as interrelated components that shape our quality of life.

O-116-005 The actions have been moved from an appendix into each of the respective policy sections. The measures have been moved from an appendix to Part IV: Implementation.

Comment Letter

We strongly recommend that all goals, policies, strategies, action tactics, benchmarks and measurements be included *together* in each section rather than splitting these critical steps apart and having them lost in the appendices - separate from the goals and policies.

Even more problematic is that the kinds of measures and associated actions are so simple and general as to be unusable as real benchmarks.

2. The Draft Vision does not put enough emphasis on the sustainable actions needed to meet the State Bill 6001 reduction in green house gases in increments by 2050 (50% below 2005 levels). This should be a critical piece of the Environmental Framework and should be embedded in all sections. In addition, how to meet these greenhouse gas emission reductions should be included in every section in the Draft Vision.

3. Sustainability should be a core, overarching objective of this entire Draft Vision to be achieved throughout all aspects of this Vision. It needs to be an integrated goal throughout not only the environmental piece, but also the sections on development patterns, the economy, transportation and public services.

4. In fact, all environmental goals and strategies in the framework need to be integrated, acted upon, achieved and monitored as part of the sections on development patterns, the economy, public services and transportation. The environmental strategies must be present in every activity. The multicounty planning policies themselves should be more integrated, reflecting the cumulative effects of actions in one area on others. This problem is compounded by the fact that the PSRC's transportation plan is not yet fully integrated into the Vision 2040 document.

5. The "Ways to Improve Ecosystem Conditions" on page 11 should be documented and presented as clear "Strategies to Restore, Protect and Improve the Natural Ecosystem." Clear action steps for implementation plus benchmarks, monitoring and measurements should then follow these strategies.

6. The issue of the ability of the natural ecosystem to absorb significant growth has not been addressed at any time in the Draft Vision. For a document making recommendations on how best to accommodate 1.7 million new residents, this oversight is critical, especially in light of our fragile and failing environment. Only when this issue is addressed can we truly begin to achieve sustainability.

7. The assumption in the document of a linear and causal process supports a basic conceptual and data flow from population and employment projections, allocation to land units, travel demand, and environmental impacts. There is no place in this process for adaptive learning, or the comprehensive monitoring of the integrated and cumulative impacts of community plans and feedback to the jurisdictional members of the PSRC on how they can adjust their policies, plans, and implementation strategies to achieve regional goals and quantitative objectives. We strongly urge that the accountability and adaptive learning elements of the Vision be improved and strengthened.

8. Water quantity and quality are mentioned in the Draft Vision, although issues surrounding water are not given the gravity and import that reflects the facts on the ground. While the Draft Vision proposes a preferred growth alternative as the best way to direct the expected growth, it does not address the likelihood of a water shortage brought on by unsustainable growth, great increases in impervious surfaces, dwindling ground water recharge, pollution, and diminishing snow packs resulting from climate change.

(Comment continues on following page)

Continuation of O-116-005

O-116-006 O-116-007 O-116-008 O-116-009 O-116-010 O-116-011 O-116-012 O-116-013

Response to Comment Letter

O-116-006 VISION 2040 has addressed this issue, with the monitoring program acknowledging the need for more, and perhaps more specific, measures to be developed over time.

O-116-007 VISION 2040 has been revised to address this issue. A new policy (MPP-En-20) has been added to address the state initiatives on climate change and the reduction of greenhouse gases.

O-116-008 The concept of sustainability is now woven throughout VISION 2040 as an important thread that ties together the environment, land use, transportation, and the economy as interrelated components that shape our quality of life. The word is now included in the title of the Environmental Framework .

O-116-009 VISION 2040 has been revised to address this issue. Environmental considerations are better integrated throughout the narratives in the policy sections and in a number of policies as well.

O-116-010 Issue best addressed at the local jurisdiction level.

O-116-011 Comment noted.

O-116-012 VISION 2040 addresses this issue. See the discussion of adaptive management in the Environment section.

O-116-013 VISION 2040 has been revised to address this issue.

The issues surrounding water quality and quantity must be addressed with clear objectives and strategies throughout the entire Draft Vision. In addition, given the state's emphasis on cleaning up Puget Sound by 2020, unless this Vision spells out clear strategies for ensuring better ways of retaining, infiltrating and cleaning up the water we do have, the Vision could be in conflict with the State's mandate to clean up Puget Sound.

9. There is not enough integration between transportation goals and policies, and air quality, water quality, climate change and the environment. Again, there needs to be greater integration of environmental policies/actions throughout all other sections of the Vision.

10. Mitigation banking has been proven not to work. Specific geological conditions are such that wetlands cannot be "created" in a place where they do not serve the same function as the location where they were filled. We recommend that mitigation banking be taken out of the Vision completely.

11. The action steps listed in the appendices appear to be merely restated goals. Action steps need to be clearly spelled out tactics and steps that any city or county can interpret and use. We see this as providing the necessary tools with which to achieve the goals and policies in a way that can be measured.

12. Climate Change needs to be its own section within the Environmental Framework, with its own set of goals, policies, action steps, benchmarks, measurements and monitoring tied to the State's plan for reducing greenhouse gas emissions. It must be integrated throughout the entire Vision document.

13. There is an opportunity to link the section on the economy with the goals of the Prosperity Partnership and the Clean Technology sector. New jobs and a whole new economy can be created through the creation of alternative fuels, green building, environmental products and services. This would help direct how the PSRC supports the new economy that leads to better solutions and long range impacts.

14. As the action steps and monitoring/measurements are brought forward under the goals and policies, far more emphasis needs to be placed on accurate steps and accountability in the measurements. We find the action steps and measurements to be inadequate when in fact, these should be the actual tools for each jurisdiction to use. We cannot emphasize enough how important it is to have attainable action steps and credible ways of benchmarking and measuring results. Every action and measurement should directly link back to the achievement of every goal and policy.

15. We recommend that PSRC consider including a "Best Practices Tool Kit" for each section as a means of directing the action steps and measuring progress toward achievement of each goal and policy.

COMMENTS ON TRANSPORTATION:

16. The structure of the transportation policies does not have enough focus on reducing environmental impacts, especially those associated with climate change. The environmental framework in the draft Vision 2040 document is a welcome approach, but the framework should be present throughout all sections of the plan, especially transportation. The goal of the transportation system institutionalizes the regional growth strategy; it should place minimizing of environmental impacts on a similar footing. Having stated a need for direct consideration of environmental effects in the transportation goal, we provide more specific comments on the elements of the existing framework.

Continuation of O-116-013

O-116-014

O-116-015

O-116-016

O-116-017

O-116-018

Continuation of O-116-016

O-116-019

O-116-020

O-116-021

O-116-014 VISION 2040 has been revised to address this issue, with stronger policies and narrative related to the environment. The Transportation section now has a subsection entitled "Sustainable Transportation" that includes policies to address transportation and the effects of emissions. Also, the Destination 2030 update will provide an additional opportunity to further address this issue.

O-116-015 VISION 2040 has been revised to address this issue.

O-116-016 This idea was considered in the VISION 2040 update process and was not accepted. Some actions are deliberately stated in general terms to allow for specific details to be identified through scoping processes and the development of work programs. VISION 2040 now clarifies that the monitoring program is a starting point and that future work will refine the program.

O-116-017 VISION 2040 has been revised to more fully address climate change issues. A new policy (MPP-En-20) has been added to address the state initiatives on climate change and the reduction of greenhouse gases.

O-116-018 VISION 2040 has been revised to address this issue. VISION 2040 includes specific actions for regional, county, and local government implementation. Numeric measures will be used to monitor implementation progress and provide accountability.

O-116-016 (continued) See response to previous O-116-016.

O-116-019 Comment noted. Best practices tool kits have been identified for those sections where they are most appropriate.

O-116-020 VISION 2040 has been revised to address this issue, with stronger policies and narrative related to transportation, environmental impacts, and climate change. The Transportation section now has a subsection entitled "Sustainable Transportation" that includes policies that address transportation and the effects of emissions. Both of the introductory narratives in the Transportation and the Environment sections have been expanded.

O-116-021 Concur. VISION 2040 has been revised to address this issue.

17. Maintenance, management, and safety goals and policies generally encompass the needed efforts to keep the system functional in an economically and environmentally sustainable manner. Policy MPP-T-3, which calls for reducing the need for new capital improvements through system management actions including pricing programs, is a welcome strategy for the regional transportation system. The effective maintenance and preservation programs identified in MPP-T-2 should specifically mention concern for minimizing environmental impacts, especially water quality and habitat cohesiveness, when implementing maintenance programs.

18. In the section on supporting the regional growth strategy, the policy of promoting coordination between transportation providers and local governments (MPP-T-8) is quite admirable, but the current structure and powers of the PSRC do not appear sufficient to allow it to ensure the policy is implemented to achieve the goals of accessibility and an efficient multimodal transportation network. Additional influence or power of the purse strings may need to be vested in PSRC or an equivalent body to make more certain that policies such as this are effectively enacted. The transportation actions in Appendix 1 under Coordinated Transit Planning call for production of guidance and recommendations that may be more effective if PSRC or similar regional entity has the ability to enforce funding priorities or transit service consistency with growth management plans.

19. Actions to "Ensure Consistency with Growth Management Planning" should also include environmental impacts, especially climate impacts and adaptation strategies, in the updated criteria that PSRC will produce for the review of transportation proposals. The state agency coordination should address the standards and actions that Department of Ecology will establish as a product of the Governor's Climate Advisory Team process as well as working closely with WSDOT on transportation plans.

20. Mention of railroad capacity expansion (MPP-T-16) is highly appropriate, but more detailed benchmarks and measures are needed for all the freight transportation policies to ensure the mode selection strongly considers the minimizing of greenhouse gas emissions per ton-mile of goods moved. The rail system has enormous potential in shifting freight transport towards lower climate change impact modes. While much of the rail system infrastructure is in private ownership, greater consideration should be given to public acquisition of railroad rights-of-way when such opportunities arise.

21. Providing greater options and mobility should first consider the centers that are connected and that are the origin and destination of many trips within the region. The completion of "missing links" in the transportation network (p. 70) must be predicated on a true need for travel between the locations that define such missing links. Mode selection for such connections should consider minimizing environmental impacts, especially the climate change effects of continued travel along such corridor connections for many decades after its completion. Land use patterns may be affected in beneficial or detrimental ways when these "missing links" are established, and these impacts must be paramount when evaluating the need for such additions to the transportation network. The focus of actions on this topic is best conducted in the area of non-motorized planning.

22. The policy of expanding capacity of the transportation system (MPP-T-21) should be contingent on getting the most benefit out of management strategies (MPP-T-3) first before adding new capacity. The location and nature of these investments are well prioritized by the state-mandated policies number 23 and 24.

23. Air transportation capacity must take into account the climate impacts of aircraft operations and be flexible in response to changes in aircraft technology. Possible facility expansion and addition to the air transportation system need to consider the ultimate

(Comment continues on following page)

O-116-022
O-116-023
O-116-024
O-116-025
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O-116-027
O-116-028
O-116-029
Continuation of O-116-028
Continuation of O-116-029
O-116-030

O-116-022 The Transportation section now has a subsection entitled "Sustainable Transportation" that includes policies that address transportation and the effects of emissions.

O-116-023 Comment noted.

O-116-024 VISION 2040 has been revised to address this issue. See, for example, En-Action-1.

O-116-025 VISION 2040 has been revised to clarify that the monitoring program is a starting point. Future work will refine the program.

O-116-026 Comment noted.

O-116-027 VISION 2040 has been revised to address this issue, with clearer policies and narrative related to centers.

O-116-028 Comment noted. The Destination 2030 update will provide an additional opportunity to address this issue.

O-116-029 VISION 2040 has been revised to include stronger emphasis on system management strategies. The goal for the subsection "Maintenance, Management, and Safety" now states: "As a high priority, the region will maintain, preserve, and operate its existing transportation system in a safe and usable state." Also, the Destination 2030 update will provide an additional opportunity to address this issue.

O-116-028 See response to previous O-116-028.
(continued)

O-116-029 See response to previous O-116-029.
(continued)

O-116-030 Comment noted.

origins and destinations of the people and goods using the system, and create an efficient mix of travel by all modes.

24. The limitation of the current financing system to raise adequate revenue is becoming more apparent. Not only is the fuel tax likely to be unable to produce the needed revenue for maintenance of the highway system, but the local option sales tax may prove to be too regressive a burden for continued support of the transit system, especially considering the needed additional investments in transit. The policy (MPP-T-28) that calls for financing methods which can sustain existing investments should also include equity and tax efficiency criteria as well as recognition of the costs imposed by users. A financing system should work to minimize the environmental burden of the transportation system users, encouraging use of modes with less impact to the environment and to other users of the system and nearby residents. Equity concerns must be considered as well since the choices available to transportation system users are likely to vary considerably by income and wealth levels. These principles should be at the forefront of the PSRC action to identify new or expanded funding for transportation.

25. The measures used to evaluate the desired outcome for a variety of transportation choices and improved mobility (Appendix 2) appear to be very shallow and incomplete. Travel times between centers, mode splits, traffic volumes, and similar measures do not adequately capture the degree to which the goals and policies detailed in the main Vision 2040 plan have or have not been achieved. Environmental indicators consistent with the Puget Sound Partnership effort and the Governor's Climate Advisory Team process recommendations should be included in the set of "end result" measures. In addition to the performance of the transportation system in providing mobility and accessibility, measures are needed to evaluate how well regional jurisdictions are doing their parts to implement the policies of this regional Vision. Adaptive learning and feedback to adjust the policies and actions taken by regional governments is needed to make the Vision 2040 process successful in the Puget Sound region.

26. Proposed regional highway spending in RTID is inconsistent with the PSRC Vision, because RTID's focus is on highway expansion and new capital projects. In addition, RTID fails to fund maintenance first, and does not use existing assets efficiently. This reality means that greater attention must be paid to the interaction between PSRC, the RTID Steering Committee, and the Legislature. The proposed highway spending is not responding to identified needs, and until it does so, the planning effort will continue to face serious, if not fatal, implementation problems.

27. Vision 2040 needs to be integrated with Destination 2030. Until that happens, environmental planning will remain problematic. One possible approach to this might be to set up a joint GMPB/TPPB subcommittee to deal with environmental issues emerging from both Boards.

Continuation of O-116-030

O-116-031

O-116-032

O-116-033

O-116-034

O-116-035

O-116-036

O-116-031 The Destination 2030 update provides an opportunity to address this issue.

O-116-032 The monitoring measures appropriately relate back to the goals, rather than attempting to have a monitoring measure for each policy. However, the monitoring program does acknowledge the need for more, and perhaps more specific, measures to developed over time.

O-116-033 At the time of publishing VISION 2040, neither the Puget Sound Partnership nor the Climate Advisory Teams have developed their work to a point where they can be used. PSRC will evaluate these various suggestions and identify opportunities where they can be incorporated as appropriate.

O-116-034 VISION 2040 has addressed this issue with the implementation monitoring measures that track various actions in relationship to areas of regional agreement, including VISION 2040.

O-116-035 Comment noted.

O-116-036 VISION 2040 has addressed this issue, with an action calling for assessing PSRC's role in regional environmental planning.

O-118

TACOMA-PIERCE COUNTY CHAMBER
POWER THROUGH CONNECTIONS

September 7, 2007

Norman Abbott
State Environmental Policy Act (SEPA) Responsible Official
Puget Sound Regional Council
1011 Western Ave., Ste. 500
Seattle, WA 98104-1035

Via email: vision2040@psrc.org

RE: Draft Vision 2040

Dear Mr. Abbott:

Thank you for the opportunity to address the Draft VISION 2040. The Chamber has been participating in the public process for this regional planning update. Please consider this correspondence as a supplement to our earlier comments, correspondence, referenced and copied documents and participation at earlier workshops.

Industrial Lands
Our Chamber recognizes and applauds that the industrial lands inventory task has been included in the draft for the Vision 2040. However, we remain concerned that the task is scheduled for the mid-term.

Industrial lands are a prerequisite for our manufacturing sector, the industries that provide most of our wealth generation. But they are also necessary for our rapidly growing logistics and trade sector, as most recognizably evidenced by the successes of our Ports. As previously submitted, available industrial lands are in an ever increasing shortage.

Current efforts to relocate existing businesses from the East Blair Waterway that are providing diversity in our economic base, illustrate the challenges for locating existing manufacturers, hazardous waste processors critical to industrial processing and water-dependent industrial land users. Also, a recent *Business Examiner* article, "Frederickson Industrial Lands to Become a Sparse Commodity," August 20, 2007, (attached) provides anecdotal examples that the scarcity of the industrial lands commodity is not just approximate to the tideflats.

Strategic considerations for future economic growth are already underway, as demonstrated by the joint evaluation by the Ports of Tacoma and Olympia for the South Sound Logistics Center in Thurston County.

(Comment continues on following page)

O-118-001

950 Pacific Avenue • Suite 300 • PO Box 1933 • Tacoma, WA 98401 • P 253.627.2175 • F 253.597.7305 • www.tacomachamber.org

O-118-001 An action calling for this work has been included.

Vision 2040 Update page 2

The Chamber recommends the task of inventorying industrial lands be prioritized as a short-term task.

Freight Mobility
Evaluation of our transportation system is frequently limited in its focus to commuter or automobile traffic. Yet it is also a critical infrastructure for our freight mobility. And, our transportation industry is a major contributor to its financial support. In the Vision 2040, Appendix 2: Monitoring and Measures, pg. A-2-5, the Chamber recommends action to identify an Outcome Measure for Freight Mobility. Perhaps, you could utilize the PSRC and enterpriseSeattle's Regional Freight Mobility Roundtable to identify meaningful measure(s) such as "average delivery time."

Defense Installations
The Chamber has commented extensively about the region's recognition and planning for the growth at our major military installations. Our regional planning for major installation growth is atypical of that for similar growth communities across the nation.

In addition to the short-term (to 2013) forecast for Fort Lewis previously submitted, please find attached an announcement for a *Draft Programmatic EIS for Growth and Force Structure Realignment* for the U.S. Army's evaluation of 17 installations nationwide to accommodate growth in personnel and global repositioning of Army units to meet the defense needs of the nation. This DPEIS examines the potential for increases in personnel of between 1,000 and 7,000 soldiers at each of these installations, inclusive of Ft. Lewis and the Yakima Training Center, after 2013. Only five of the 24 cities wholly or partly in Pierce County exceed the population (as of 4-01-07) of either the growth that has already occurred since 2003 or this potential increase after 2013.

The Chamber recommends the growth and planning models for the region incorporate the existing growth at our installations since 2000, examine the potential growth, and consider all the major installations in the region.

Military Airfields
The Chamber is supportive of the ongoing studies for airfields, with the inclusion of military airfields. The region shares the national issue of encroachment. The Chamber expresses it's thanks to PSRC for the timely conduct of this task.

Continuation of O-118-001

O-118-002

O-118-003

O-118-004

O-118-002 VISION 2040 has been revised to clarify that the monitoring program included in the document is a starting point. PSRC will evaluate this suggestion and identify opportunities where it can be incorporated as appropriate.

O-118-003 VISION 2040 has been revised to include more discussion regarding the military sector employment and forecasting, as well as the importance of the military as an economic sector.

O-118-004 Comment noted.

Job Growth and Population

The Chamber and Economic Development Board for Tacoma-Pierce County have weighed in strongly for a different approach to regional economic and population growth. We suggest that collocating jobs with the projected population trends be a top priority. The outcome would be less reliance on an overburdened and/or financially-draining transportation (commute) network and a more equitable and even more environmentally friendly distribution of employment.

First, without an adequate employment base to support the resident population, the tax base of the community is insufficient to support vital services and quality of life amenities. The tax burden then tends to fall disproportionately heavier on urban residents and businesses. Second, people tend to shop, recreate and eat where they work; and local job opportunities support local commerce. Third, local business tends to get involved locally and provide leadership, volunteerism and financial support to the social network issues and quality of life opportunities. Fourth, local employees seem to take a more intense interest in local affairs, perhaps because they have more time not committed to the commuting drudgery. Fifth, local employment helps alleviate commute congestion in key corridors and open access of the transportation infrastructure to commerce and freight mobility.

The PSRC is forecasting a much larger increase in population for Pierce County – consistent with trends – than for the forecast for the county's employment. Unfortunately, this just continues the trend of the past few decades that has resulted in about 30% of the workforce leaving the county each day for work.

The Chamber suggests a rethinking on a regional basis of what policies, investment and incentives might best serve a truly regional approach to a strong regional economy. Seattle will always be an important and likely preeminent, strong regional economic center. However, sub-regional centers can and should have an important role in areas

(Comment continues on following page)

O-118-005

O-118-005 The housing policies in VISION 2040 are now a separate section in Part III: Multicounty Planning Policies. The narrative discusses ways to produce a better jobs-housing balance. There also is a new policy in the Economy section that calls for incentives and investments to create a better jobs-housing balance.

Continuation of O-118-005

like Pierce County where leaders thoughtfully address the economic growth opportunities of all citizens.

Sincerely,

Gary D. Brackett, CCR
Manager, Business and Trade Development

Attch.

950 PACIFIC AVENUE, SUITE 300, PO BOX 1933, TACOMA WA 98401-1933
PHONE: 253-627-2175, FAX: 253-597-7305, www.tacomachamber.org

Note: This page of comments does not require a response.

[Federal Register: August 24, 2007 (Volume 72, Number 164)]
[Notices]
[Page 48620-48621]
From the Federal Register Online via GPO Access [wais.access.gpo.gov]
[DOCID:fr24au07-40]

DEPARTMENT OF DEFENSE

Department of the Army

Notice of Availability of the Draft Programmatic Environmental Impact Statement (DPEIS) for Army Growth and Force Structure Realignment

AGENCY: Department of the Army, DoD.

ACTION: Notice of Availability (NOA).

SUMMARY: The Department of the Army announces the availability of a DPEIS for the growth and realignment of the U.S. Army. Pursuant to the National Environmental Policy Act (NEPA), the Department of the Army has prepared a DPEIS that evaluates the potential environmental and socioeconomic effects associated with alternatives for growing and realigning the Army's force structure. Potential impacts have been analyzed at installations which are being considered for the stationing of 1,000 or more Soldiers in efforts to grow and realign the Army.

DATES: Written comments on the DPEIS will be accepted for 45 days following the publication of a Notice of Availability in the Federal Register by the U.S. Environmental Protection Agency.

ADDRESSES: Send all written comments and suggestions concerning this DPEIS to: Public Affairs Office, U.S. Army Environmental Command, Building E4460, Attention: IMAE-PA, 5179 Hoadley Road, Aberdeen Proving Ground, MD 21010-5401. Comments may also be sent to: PublicComments@aec.apgea.army.mil.

FOR FURTHER INFORMATION CONTACT: Public Affairs Office at (410) 436-2556; facsimile at (410) 436-1693 (during normal business hours Monday through Friday).

SUPPLEMENTARY INFORMATION: The Proposed Action and analysis within the DPEIS covers those activities needed to increase the Army's end strength and realign its force structure from Fiscal Year 2008 thrcugh Fiscal Year 2013 to a size and composition that is better

[[Page 48621]]

able to meet national security and defense requirements. The Proposed Action involves stationing decisions to align Army forces in support of military transformation, unit equipment and training readiness, and Soldier and Family quality of life needs. To implement the Proposed Action, new units must be stationed at locations that are able to accommodate unit training, garrison operations, maintenance activities, and Soldiers and their Families. In addition, final stationing locations must support the strategic deployment

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and mobilization requirements of the nation's Combatant Commanders to ensure they will have the forces necessary to support regional contingency operations and planning requirements.

The current global security environment is turbulent, unpredictable, and rapidly changing. It has placed considerable demands on the nation's military, and highlighted the need for the Army to correct shortfalls in high-demand skills while conducting a thorough assessment of its force capabilities. No one has felt the impacts from the increased demands of the modern security environment more than the Soldiers and Families of the U.S. Armed Forces. To meet the challenges posed by a wider range of security threats present in the 21st century, the Army requires the growth and restructuring of its forces in order to sustain the broad range of operations needed to ensure national and global stability.

The DPEIS is being prepared to comply with NEPA (42 U.S.C. and et seq.) and meet Army NEPA procedures, which are outlined in Environmental Analysis of Army Actions (32 CFR Part 651). These regulations require the Army to consider the environmental and socioeconomic impacts of its proposed action and alternatives and to solicit the views of the public, so it can make an informed final decision regarding how to proceed.

The DPEIS examines major Army training installations and their ability to support new unit stationing actions in connection with the growth and realignment of the U.S. Army. The DPEIS will provide the Army senior leadership with a hard look at environmental and socioeconomic impacts associated with the Proposed Action and inform the decision-making process for selecting the final stationing locations for new units. This effort includes analysis of specific actions that will need to be taken (such as the construction of housing and quality of life facilities, the construction of new training ranges and infrastructure, and changes in the intensity of use of maneuver land and firing ranges) to station new units as part of the Army's overall efforts to grow and realign the force.

After reviewing a full range of alternatives sites, 17 installations capable of supporting the Army's growth and realignment have been evaluated for their ability to support three action alternatives. The installations carried forward for analysis include: Fort Benning, GA; Fort Bragg, NC; Fort Bliss, TX; Fort Campbell, KY; Fort Carson, CO; Fort Drum, NY; Fort Hood, TX; Fort Hunter-Liggett, CA; Fort Irwin, CA; Fort Knox, KY; Fort Lewis, WA; Fort Polk, LA; Fort Riley, KS; Fort Stewart, GA; White Sands Missile Range, NM; Yakima Training Center, WA; and Yuma Proving Grounds, AZ. Each of these installations could receive 1,000 or more additional Soldiers as part of alternatives being examined.

Alternatives carried forward for analysis in the DPEIS include; (1) Implementing Army force structure modifications between Fiscal Years 2008 and 2013 to support the Army's Modular transformation and Global Defense Posture Review (GDPR) decisions; (2) Executing those actions discussed as part of Alternative 1 and, in addition, adding approximately 30,000 Combat Support (CS) and Combat Service Support (CSS) Soldiers to the Army to address critical shortfalls in high demand military skills in both Active Army and Reserve components; (3) Executing those actions proposed in Alternatives 1 and 2 and, in addition, grow the Army by up to 6 Active Duty Brigade Combat Teams (BCTs). Additional BCTs would be stationed at existing or newly established Army stationing locations within the continental United States. In addition to these alternatives, the No Action Alternative is described and its impacts are fully assessed and considered.

Analysis within the DPEIS covers those activities required to implement unit stationing actions associated with Army growth and realignment. Site-specific actions which will need to be taken include the construction of housing and quality of life facilities (i.e., gymnasiums, hospitals, shopping

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areas), the construction of new training ranges and infrastructure, and changes in the intensity of use of maneuver land and firing ranges associated with the increased frequency of training events. Stationing decisions made as part of this effort will also consider strategic military and national security considerations, New stationing actions must take place at locations which, if selected, are capable of supporting the National Security Strategy (2006), the Quadrennial Defense Review (QDR, 2006), National Military Strategy, and the Army Campaign Plan (ACP).

Direct, indirect, and cumulative impacts of the Proposed Action have been considered in the DPEIS. The DPEIS identifies the environmental and socioeconomic impacts associated with various unit stationing actions at each of the 17 installations carried forward for analysis. Impacts at sites would result from construction and training activities related to the growth and realignment of Army forces. Significant impacts to resources could be direct and long term. Decisions from the PEIS will be tiered into site-specific NEPA analysis at the installation level as specific stationing decisions are determined. The DPEIS will provide Army planners and decision makers with critical and timely information on the capacity and condition of each of the installation's environmental and socioeconomic resources preceding specific stationing actions. The No Action Alternative provides the baseline conditions for comparison to proposed alternatives. Additional concerns or impacts may be identified as a result of comments received on the DPEIS.

The Army invites full public participation to promote open communication and better decision making. All persons and organizations that have an interest in the growth and realignment of the Army's forces and associated stationing actions are invited to participate in this NEPA evaluation process. Assistance will be provided upon request to anyone having difficulty understanding how to participate.

The availability of the PDEIS for public comment will also be announced through notices and national and local media news releases. Information on the DPEIS will be posted on the U.S. Army Environmental Command's Web site (www.aec.army.mil) for public access during the public comment period.

Dated: August 15, 2007.
Addison D. Davis, IV,
Deputy Assistant Secretary of the Army (Environment, Safety and Occupational Health).
[FR Doc. 07-4149 Filed 8-23-07; 8:45 am]
BILLING CODE 3710-08-M

Note: This page of comments does not require a response.

BusinessExaminer.com | August 20, 2007

Frederickson industrial lands to become a sparse commodity

By Sarah Kahne
Business Examiner Staff

Finding easily developable industrial land in Frederickson is now a thing of the past. With Ikea working on its 70-acre distribution center, Panatonni moving forward on two projects totalling 70 acres and Old Castle preparing to submit for permits of its industrial center; several long-time companies are also looking at expansion.

"The rest of the easily developable land in Frederickson has been absorbed," said Derrick Urquhart, manager of industrial real estate for Port of Tacoma. "Toray is expanding for the third time. Trinity Glass is looking at an expansion. Medallion Foods is looking at expanding and bringing in rail."

Another 13 acres at the port property are currently under negotiation, he said. The promise of Cross-Base Highway has certainly given many companies confidence and encouraged development in anticipation of the infrastructure.

The downside is that industrial land seems to be evaporating in Pierce County.

"Brokers are communicating that we're out of land. Anything that is available is already sold or under negotiations. Everything at the port is spoken for," Urquhart said.

James Hardie is making another attempt at purchasing land from Tacoma Power to make room for an expansion. The port is trying to facilitate any property acquisition on behalf of the siding company.

There is still land available for industrial use in Frederickson, but much of it has development challenges. Urquhart said wetlands and topography are the two biggest issues for acreages that remain available.

The Holdner property, some 100 acres of land zoned industrial and owned by Sumner-based Investco, is currently working with Pierce county to address topography and utility issues. It remains unclear if the site will be suitable for industrial development or will be marketed for some other use.

"The marginal lands are still out there. It just depends on the county and how creative they can get in concert with developers and users," Urquhart said. "We need to get the permitting side of the county thinking about how the remaining sites could be usable. There needs to be a commitment to putting every ounce of industrially-zoned land to use."

In the meantime, port officials and other developers are pondering alternate sites beyond Frederickson to allow for growth within the industrial sector. American Lake Gardens, the abandoned Microchip facility, Cascadia, Burlington Northern Santa Fe property in South Tacoma and Nalley Valley redevelopment sites are all under consideration.

"Outside of those, Centralia is really the next alternative," he said. "There are a couple of opportunities in DuPont, but they aren't really big enough for the users we're seeing come into the marketplace." BE

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THE CASCADE AGENDA
100 Years Forward

O-130

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Craig Ueland

September 7, 2007

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

Dear Mr. Abbott,

On behalf of the the Cascade Agenda Leadership Team, thank you for the opportunity to comment on the Draft VISION 2040 document. The Cascade Agenda Leadership team represents a broad range of interests united by a common vision for our region—Cascade Agenda. We recognize the importance of your work and appreciate the opportunity to contribute to this discussion.

The attached comments reflect the endorsement of the Cascade Agenda Leadership Team (Abstain: Robert Drewel)

Sincerely,

Gene Duvernoy
(on behalf of the Cascade Agenda Leadership Team)

Date September 7, 2007

Note: This page of comments does not require a response.

THE CASCADE AGENDA
100 Years Forward

The Cascade Agenda: Draft VISION 2040 Comments

The Cascade Agenda supports the Puget Sound Regional Council's work on the Draft VISION 2040 document, a comprehensive and forward-thinking regional growth plan for the next 33 years. VISION 2040 sets the right direction for the region and will help cities, counties, and communities establish positive policies and actions as they plan for the future. The document excels in specific areas, such as supporting the use of innovative tools like Transfer of Development Rights as ways to meet multiple VISION 2040 goals. However, to further strengthen the document we strongly suggest setting the context for resource lands conservation by including detailed data and discussion of development on these lands. The Cascade Agenda appreciates the opportunity to elaborate on these and other comments on the Draft VISION 2040.

O-130-001 Thank you.

O-130-002 VISION 2040 has been revised to more fully discuss resource lands.

VISION 2040 SETS THE RIGHT TONE AND DIRECTION

The report excels in helping citizens and local governments think about the region's future. The fundamental question that the report asks provides this high level direction: "how can the region accommodate another 1.7 million people and 1.2 million new jobs by 2004 while enhancing the environment and our overall quality of life?" This question is complementary to the work of The Cascade Agenda to envision the region 100 years from now and take steps to move the region toward the vision of the future that we want.

O-130-001 (continued) See response to previous O-130-001.

O-130-003 Thank you.

There are several specific areas where The Cascade Agenda complements VISION 2040 on its guidance for bringing prosperity, environmental health, and neighborhood vitality in the next 33 years. These elements include transfer of development rights, use of the environmental framework, multiple policies and actions that support the creation of vibrant city centers, support for permanent protection for resource lands, and regional strategies for both green space and housing.

Transfer of Development Rights

We are pleased that VISION 2040 highlights Transfer of Development Rights (TDR) in the multicounty planning policies (MPP-DP-43) and the implementation actions ("Orderly Development – Transfer and Purchase of Development Rights"). TDR was one of the main suggestions that the Cascade Agenda Leadership Team submitted regarding the VISION 2040 Draft Environmental Impact Statement in 2006. This policy is critical to supporting the efforts underway to establish a regional transfer of development rights marketplace across the PSRC region. TDR is a cornerstone strategy to accomplishing multiple VISION 2040 goals, including directing growth into areas with existing infrastructure and urban services, conserving rural and resource lands, and protecting sensitive environmental areas.

O-130-004 Comment noted.

(Comment continues on following page)

The legislature further validated the concept of TDR when it overwhelmingly passed SHB 1636 in the 2007 legislative session. The bill establishes a process to design a regional TDR marketplace. The Department of Community Trade and Economic Development will convene a group of stakeholders to make recommendations to the 2009 legislature on how to enable fair and effective development rights transactions for all those involved. MPP-DP-43 appropriately anticipates this process and sets the stage for a productive working relationship between PSRC and CTED in designing regional TDR.

Continuation of O-130-004

Environmental Framework

The Cascade Agenda applauds PSRC for establishing an environmental framework within which the discussion of VISION 2040 goals and actions takes place. The Cascade Agenda supported this approach when it was considered in the Draft EIS as a way to connect growth management targets with landscape conservation and restoration. The environmental framework communicates the need for a growth strategy that maintains ecological functions and recognizes the critical linkages between the region's economy, natural environment and quality of life.

O-130-005

O-130-005 Thank you.

Vibrant cities

VISION 2040 includes a range of policies and actions to foster vibrant, pedestrian-centered, transit-oriented urban centers. These types of centers are a key to the success of the region. We must provide incentives for living in compact communities and a high quality of life in our urban centers is one of the strongest incentives we can create. Vibrant cities have as much to do with conservation and the overall health of the region as policies that directly conserve resource and natural lands. VISION 2040 recognizes this connection and establishes relevant policy direction for the region, including policies DP-17, 18, 52, 56, and T-9. The discussion of compact urban communities and redevelopment opportunities on page 44 is also noteworthy for helping to set the right context and vision for creating vibrant cities.

O-130-006

O-130-006 Thank you.

Permanent protections for resource lands

The regional growth strategy establishes the appropriate policy direction for resource lands by specifying the need for *permanent* protection of these lands. It is not enough to minimize development in these areas. Even small amounts of development can eliminate the utility of our region's economically and environmentally valuable forest and farm lands. The Cascade Agenda supports VISION 2040 in envisioning a future where "resource lands are permanently protected, supporting the continued viability of resource-based industries such as forestry and agriculture." The Cascade Agenda also highlights MPP-PS-4 as an important and positive step toward supporting permanent protections for rural character and resource lands.

O-130-007

O-130-007 Comment noted.

Regional green space and housing strategies

VISION 2040 takes the right approach in committing to create a regional green space strategy and a regional housing strategy. Both of these issues provide regional benefits and cross county and municipal boundaries. Stewardship and acquisition of open space lands must be coordinated across jurisdictions in order to be successful. Similarly, with the movement of people across city and county lines to jobs and services, affordable housing is a regional issue that needs to move away from piecemeal approaches focused on individual strategies within individual jurisdictions. The Cascade Agenda supports MPP-En-8, the Action titled "Earth and Habitat – Open Space" and the Action titled "Housing – Supply."

O-130-009 & O-130-008

SEVERAL CHANGES WILL MAKE VISION 2040 STRONGER

The Cascade Agenda requests that VISION 2040 include data regarding rural and resource land conversion and large lot development. The draft does state that rural and resource land conservation is a priority but it does not provide data on the extent to which development is happening in rural and resource areas that is incompatible with those uses. This type of background data and statements describing these trends are essential for communicating the urgency of protecting threatened landscapes and clarify the need for innovative approaches such as transfer of development rights, mitigation banking, and conservation development. The Cascade Agenda also suggests other changes such as a policy articulating the carbon emission reduction benefits of compact land development and better linkage between policies and funding for compact communities.

O-130-010

O-130-011

Show the impact of large lot development and land conversion

The PSRC region loses on average approximately 5,500 acres of agricultural land every year. Between 2000 and 2006, there were almost 30,000 residential building permits issued outside the Urban Growth Area on rural, farm, and forest lands. The growth coming to the region is having rapid and significant negative impacts on our resource lands.

Draft data generated for The Cascade Agenda suggest that King County has approximately 6,600 unexercised development rights encompassing over 191,000 acres of what is now farm and forest land. VISION 2040 does not allocate any growth to these lands, which is absolutely the appropriate policy, but current zoning means that development can and will continue to occur unless the region deploys new strategies.

Even large lot development on forest and farm land can destroy the utility of that land. On forestland, development of 80 acre parcels means that only a few hundred residences can take thousands of acres out of production. With that removal from production so also goes much of the economic, ecological, watershed, and habitat value. Farmland faces similar threats. Many agricultural areas in Pierce and Snohomish Counties, for example, allow minimum lot sizes of 5-10 acres. Parcels of this size are small for most agricultural

Continuation of O-130-010

(Comment continues on following page)

O-130-008 Comment noted. The greenspace strategy will likely address all Growth Management Act land use categories.

O-130-009 Comment noted.

O-130-010 VISION 2040 has been revised to clarify that the monitoring program included in the document is a starting point. An action has been added that calls for future work to refine and improve the program.

O-130-011 VISION 2040 has been revised to address this issue.

O-130-010 (continued) See response to previous O-130-010.

uses, and increasing land values and development pressures will lead to the conversion of a significant share of these parcels for uses not associated, and potentially incompatible, with farming.

VISION 2040 needs to explicitly show the rate at which we are losing our resource lands to development. This should include data for building permits issued on farm and forest land, loss of farm and forest land in acres, and amount of unexercised development rights to show the potential for these trends to continue and even accelerate. Then, the report needs to add actions and measures to ensure these elements are tracked and addressed in the future.

VISION 2040 is the most appropriate and credible process for using these trends to show that current zoning tools are insufficient and that we will lose our valued rural and resource lands without new approaches and tools. The data to support this conclusion must be sanctioned by the collaborative analysis coming from PSRC and its member jurisdictions. Local governments will look to PSRC for this type of context and information as a way to frame their own implementation steps for policies derived from VISION 2040. The Cascade Agenda and its partner organizations are working to get this information out to the public and decision makers, but the effort will only be successful if PSRC leads regional players in working from the same understanding of regional land use trends.

The following points are specific suggestions for where PSRC can include improved text or data to show the significant challenge that the region faces in achieving VISION 2040 rural and resource land conservation goals.

1. Modify Action "Regional Development Patters" on page A-1-3 to read
   - "The Puget Sound Regional Council will study, track, and evaluate growth and development occurring <u>across</u> ~~in~~ the central Puget Sound region<u>'s urban, rural, and resource lands</u> in terms of meeting the goals and objectives of the regional VISION. <u>This will include a comparison of the trends in growth on resource lands to the VISION goal of zero growth allocation to these areas.</u>
2. Modify the *Measure* under the Outcome "Designated natural resource and rural areas are permanently protected from incompatible growth" on page A-2-4 to read:
   - "*Measure:* Development densities, <u>new permits on rural and resource lands, unexercised development rights</u>, and distribution and quantity of, <u>and change in</u>, designated urban, rural, agriculture, forest, and mineral resource lands"
   - New sources for this modified measure could include the National Agricultural Statistical Service for change in agricultural land use, UW Forestry Department for change in forest land use, and Cascade Land Conservancy for unexercised development rights.
3. Modify MPP-DP-3 to read:

(Comment continues on following page)

Continuation of O-130-010 — O-130-012

Continuation of O-130-010

O-130-013

O-130-014

O-130-015

O-130-012 VISION 2040 has been revised to clarify that the monitoring program included in the document is a starting point. An action has been added that calls for future work to refine and improve the program.

O-130-010 (continued) See initial response to this comment.

O-130-013 Comment noted. See section on Monitoring and Measures.

O-130-014 Thank you. PSRC will use these sources.

O-130-015 VISION 2040 has been revised to include this edit. See what is now MPP-DP-31 in the final document.

- "Support the sustainability and stop the conversion of designated resource lands."

4. Create a new MPP in the Rural Lands section that reads:
   - "MPP-DP-XX Use compact rural developments, enabled by transfer of development rights, to consolidate existing potential for rural development, minimize impacts on rural lands, and preserve rural character."
5. Add the following text at the end of the Natural Resource Areas section of the regional growth strategy on page 18:
   - "The regional growth strategy does acknowledge that development is occurring on these lands because of vested development rights and low density zoning. This small amount of growth can have significant impacts on the economic viability of industries depending on these lands. The region will employ innovative strategies to address these trends and permanently protect resource lands."
6. Add the following text at the end of the first paragraph under "Resource Lands" in the Development Patterns section of the MPPs on page 36:
   - "Even low density development can eliminate productivity when patchwork conversion happens across the landscape."
7. Add the following text at the end of the first paragraph under "Agricultural Lands" in the Development Patterns section of the MPPs on page 37:
   - "On average, King, Pierce, Snohomish, and Kitsap Counties lose a combined total of 5,500 acres of farmland to development each year."
   - Source for this data: USDA, National Agricultural Statistics Service, 2002 Census of Agriculture - Washington State and County Data Volume 1, Geographic Area Series Part 47, Table 8. Farms, Land in Farms, Value of Land and Buildings, and Land Use: 2002 and 1997 pp. 238 – 242 (AC-02-A-47 June 2004)
8. Add the following text to the end of the second paragraph under "Rural Lands" on page 46
   - "These development patters continue in some places today and threaten the utility of rural lands. Existing development potential in these lands means that current zoning in areas allows for a level of development that is incompatible with goals for rural areas."
9. Add the following text to the end of the fourth paragraph under "Rural Lands" on page 47
   - "Innovative approaches like transfer of development rights can offer communities a way to transfer rural density in a fashion that best maintains rural character."

Link carbon reduction to responsible development and specific reduction goals

VISION 2040 appropriately highlights climate change as a major threat to our businesses and environment and identifies steps to reduce the carbon footprint of the region. These steps need to include more proactive strategies to make the connection between land use and global warming. The Cascade Agenda recommends adding two Multicounty

(Comment continues on following page)

Continuation of O-130-015

O-130-016 This idea was considered and a new policy (MPP-DP-26) was added to focus rural development in existing activity. Also see the expanded narrative on rural development.

O-130-017 VISION 2040 has been revised to address this issue.

O-130-018 VISION 2040 has been revised to address this issue.

O-130-019 While this specific data has not been added, VISION 2040 has been revised to note development trends in the natural resource areas and their associated impacts.

O-130-020 Issue best addressed at the local jurisdiction level.

O-130-021 VISION 2040 has been revised to address this issue.

O-130-022 VISION 2040 has addressed this issue. VISION 2040 includes specific actions for regional, county, and local government implementation. Measures will monitor implementation progress.

O-130-023 VISION 2040 addresses this issue in the Environment section.

Planning Policies under the goal of "The region will reduce its overall production of harmful elements that contribute to climate change." One of these would draw the linkage between sprawl reduction and climate solutions. The other would set a specific target for regional emissions reductions that is consistent with the Governor's Executive Order 07-02 establishing the Washington State Climate Advisory Team.

- MPP-En-XX Reduce greenhouse gases by encouraging compact, energy efficient development patterns
- MPP-En-XX Consistent with the goals of the Washington Climate Advisory Team, reduce regional carbon emissions to 25% below 1990 emission levels by 2035.

Highlight the need for urban green space to accompany compact development

VISION 2040 should place more emphasis on the need for parks in compact urban communities. As density increases, our cities need to pay particular attention to ensuring sufficient recreation areas, parks, and green spaces for residents. Also, The Cascade Agenda supports the idea of creating a regional green space strategy. This strategy will be even stronger if VISION 2040 specifies that it should include urban green space as well as open space and parks around cities and in rural areas. Here are several specific suggestions for accomplishing this linkage between compact communities and parks in policies and actions.

- Modify MPP-DP-56 to read
  - "Identify opportunities to create, expand, and appropriately steward parks, civic places and public spaces, especially in or adjacent to centers and compact communities."
- Modify the Action "Earth and Habitat – Open Space" to read
  - "The Puget Sound Regional Council, its member jurisdictions, and open-space organizations shall develop a regional green space strategy. (Address regional trail development and urban green space in such a strategy.)"
- Add an outcome and measure to the Development Patters section on page A-2-4 that reads
  - "Outcome: Urban centers are vibrant attractive places with nearby access to parks and green space"
  - "*Measure*: acres of locally-owned parks and open spaces per 1,000 residents.
  - Source: PSRC Parks and Open Space Database"

Encourage compact, walkable communities through funding strategies

Several VISION 2040 policies and actions highlight the need to connect infrastructure funding with goals for the region. These policies and actions will provide stronger, focused incentives for cities and counties if they more specifically link funding sources with the policy of creating compact, walkable communities, per MPP-DP-11, MPP-DP-

(Comment continues on following page)

Continuation of O-130-023

O-130-024

O-130-025

Continuation of O-130-008

O-130-026

O-130-027

O-130-028

O-130-029

O-130-024 VISION 2040 has been revised to address this issue. The Environment section narrative has a stronger focus on several topics of concern and a number of policies have added language with regard to specific comments. A policy has been added to address the state initiatives on climate change and the reduction of greenhouse gases.

O-130-025 VISION 2040 has been revised to address this issue.

O-130-008 (continued) See initial response to this comment.

O-130-026 VISION 2040 has been revised to address this issue.

O-130-027 This request was considered and the action was kept as written.

O-130-028 VISION 2040 has been revised to clarify that the monitoring program included in the document is a starting point. An action has been added that calls for future work to refine and improve the program.

O-130-029 Comment noted. Note that the narrative related to centers was expanded.

18, and MPP-T-9. The Cascade Agenda offers the following recommendations for revising policies and actions in this regard.

- Change MPP-DP-17 to read "Direct funding to incentivize compact and pedestrian- and transit-oriented development in centers, including secondary centers and town centers, through statewide, countywide, subregional, and local investment processes and funding strategies."
- Modify the Action titled "Revise Transportation Funding Criteria" to include this phrase at the end: "and projects that support compact, pedestrian, and transit-oriented land use developments (T-9)."
- Modify the Action titled "Compliance with Regional Plans" to include this phrase at the end: "and in facilities and services that support compact, pedestrian, and transit-oriented land use developments (T-9)."
- Add a new *Measure* under the Outcome "The region's residents have a variety of transportation choices and improved mobility" on page A-2-5 that reads:
    - "*Measure:* Percentage of regional transportation dollars funding transportation facilities and services that support compact development (MPP-T-9)."

Other suggestions

In addition, we have several other suggestions for strengthening the document.

- Modify the third sentence in the first paragraph under Environment, Regional Approach on page 28 to read "The region's approach to greater environmental stewardship is to improve coordination and increase the commitment to sustaining the environment through conservation of resources, compact communities, protection of habitat, and restoration of natural systems."
- Modify MPP-En-5 to read "Promote the use of innovative environmentally sensitive development practices, including location, design, materials, construction, and on-going maintenance."
- Modify MPP-En-12 to read "Preserve and restore native vegetation to protect habitat, especially where vegetation contributes to the overall ecological function and in urban areas where invasive species are a severe threat to native ecosystems."
- Modify MPP-En-24 to read "Anticipate and address the impacts of climate change on regional water sources and flow regimes, including the need for more natural water storage areas such as wetlands and floodplains to accommodate higher peak water flows."
- Add a box within the text on page 39 or 40 under Part I: Land Use titled "The Cascade Dialogues and Cascade Agenda"
    - Suggested box text: "In 2004 and 2005, 3,500 community leaders and stakeholders gathered for The Cacade Dialogues, a regional conversation to inform a 100-year conservation agenda for the Cascades, the waters and the communities of King, Kittitas, Pierce, and Snohomish Counties. The result was The Cascade Agenda which presented long term strategies to

(Comment continues on following page)

Continuation of O-130-029

O-130-030 The Regional Council does not set statewide funding priorities.

O-130-031 This issue was considered and the action was kept as written.

O-130-032 This issue was considered and the action was kept as written.

O-130-033 VISION 2040 has been revised to clarify that the monitoring program included in the document is a starting point. An action has been added that calls for future work to refine and improve the program.

O-130-034 This idea was considered in the VISION 2040 process and the language was kept as written.

O-130-035 VISION 2040 has been revised to address this issue. A reference was added to MPP-En-5 to keep natural features intact when considering site development.

O-130-036 VISION 2040 has been revised to include this edit. See what is now MPP-En-12.

O-130-037 VISION 2040 has been revised to address this issue.

O-130-038 VISION 2040 has been revised to address this issue.

conserve 1.3 million acres of working farms, forests, and natural areas and create vibrant and vital cities to attract the growth coming to our region. Work to achieve the goals of The Cascade Agenda is moving forward hand-in-hand with VISION 2040 using strategies such as transferable development rights."

- Make map colors easier to read. The maps on page 21 in the VISION 2040 draft and in Chapter I, page 11 of the SDEIS are difficult to read because the color gradation is not in a logical order.

Continuation of O-130-038

O-130-039

O-130-040

O-130-039 The Final EIS has been updated to address this issue.

O-130-040 See response to O-130-039.

O-170

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September 11, 2007

Norman Abbott
PSRC SEPA Responsible Official
1011 Western Avenue Suite 500
Seattle WA 98104

Re: Comments on Draft Vision 2040 and Draft EIS

Dear Mr. Abbott:

I write on behalf of Transportation Choices Coalition and Defenders of the Environment. Transportation Choices is a grass-roots advocacy and education organization. Transportation Choices supports transportation funding prioritized on cost effectiveness and environmental and social benefit. Transportation Choices advocates for measures that reduce the number of car trips and expand transportation choices. The environmental and social benefits of a wise transportation policy include a reduction in greenhouse gas emissions. Our goals are consistent with recent state legislation (SB 6001) which seeks, by 2020, to reduce overall greenhouse gas emissions in the state to 1990 levels and, by 2050, to reduce greenhouse gas emissions to just 50% of 1990.

We have reviewed the Draft Vision 2040 document and the related environmental review documents. There are many fine features in these documents but we believe that the transportation and related growth management elements of these documents fall far short of the dramatic action that is needed to accomplish the state's greenhouse gas emission objectives.

This region is by far the largest source of greenhouse gas emissions in the state and transportation-related emissions account for approximately 50% of the greenhouse gas emissions in this region. If this region is serious about meeting the State's goals for greenhouse gas emissions reductions in the coming decades, it must quickly adopt transportation and growth management strategies that are significantly different than the ones that have brought us to this point. Unfortunately, the alternatives addressed by PSRC to date appear to be minor variations of past trends. None of the alternatives presented contemplate a reduction in greenhouse gas emissions by 2020 to the levels that existed in 1990. Indeed, rather than forecasting a reduction

(Comment continues on following page)

O-170-001
O-170-002
O-170-003

Response to Comment Letter

O-170-001 Comment noted. See sustainability framework, and also new design in Environment section that identifies the climate provisions throughout VISION 2040.

O-170-002 VISION 2040 has been revised to address this issue. The Environment section narrative has a stronger focus on several topics of concern and policy language has been added with regard to specific comments. A policy has been added to address the state initiatives on climate change and the reduction of greenhouse gases.

in greenhouse gas emissions to 1990 levels, all of the alternatives forecast vast increases in greenhouse gas emissions over the life of the plan.

The environmental documents do not provide the decision makers with a true choice among competing alternatives in this regard. Each of the alternatives assessed contemplates an increase in greenhouse gas emissions in 2040 of between 58,200 and 64,000 tons pending. DEIS at 5.4.1; SDEIS at II.33. Each of these alternatives contemplates transportation related greenhouse gas emissions rising significantly (40% or more) compared to 2000 emission levels (and even a greater percentage increase compared to 1990 levels). This does not provide the decision makers with a reasonable choice among competing alternatives. There should be an alternative which would reduce greenhouse gas emissions to 1990 levels by 2020 and to 50% of 1990 levels by 2050. Alternatives with intermediate endpoints could also be included.

The failure of the environmental review documents to provide decision makers with a real choice among alternatives undermines one of the most basic aspects of the environmental review process required by the State Environmental Policy Act. An analysis of alternatives is the heart of any EIS. When an EIS presents a narrow range of alternatives, it "ends its inquiry at the beginning," and deprives decision makers of the important options they need. State of California v. Block, 630 F.2d 753, 767 (9th Cir. 1982). To be consistent with SB 6001 and the State Environmental Policy Act, PSRC should develop one or more additional alternatives that provide a real choice among alternatives.

We are also concerned about the accuracy of the environmental assessment included in the environmental review documents. There appears to be a large gap between some of the broadly stated goals on the one hand and the identification of specific policies and actions to accomplish those goals on the other. For instance, the draft document indicates that "the development of centers lies at the heart of Vision 2040 . . . They are locations identified to take a greater proportion of future population and employment development in an effort to curb sprawl." Draft Vision 2040 at 39. Yet this laudatory goal is not followed by specific policies and actions to assure that it is achieved. Measures like minimum average residential densities for urban areas and requiring zoning for transit-oriented development to accompany all major transit areas and high capacity transit investments are examples of policies and actions that should be adopted by PSRC to effectuate the broadly stated goals. Without mandatory actions of that type, there is no assurance that the broad goal statements will be achieved.

It is unclear what assumptions were employed by PSRC when developing its environmental review. Did PSRC assume that the goals would be fully achieved, even though they were not accompanied by specific policies and actions? If the environmental analysis assumed full achievement of the goals, then that analysis is flawed because there are inadequate policies and actions to assure compliance with those goals. If, on the other hand, the environmental analysis

(Comment continues on following page)

Continuation of O-170-003

O-170-004

O-170-005

O-170-003 Comment noted. The Preferred Growth Alternative is better on nearly every environmental measure, including air quality emissions, as compared to the extension of current plans. Note that one of the key assumptions guiding the update (as determined in the initial Public Scoping Report) is to use the same transportation system (as embodied in Destination 2030) as the basis for all of the VISION 2040 alternatives. Destination 2030 is now being updated to improve the transportation system. See En-Action-7 which calls for a Climate Change Action Plan.

O-170-004 VISION 2040 is not a "regional comprehensive plan." It relies on many participants for implementation. The specifics that your letter seeks are found in local comprehensive plans and development regulations.

O-170-005 The environmental analysis is based on anticipated impacts under the any of the alternatives. This includes the full set of investments in Destination 2030. The multicounty planning policies are designed to help implement the Regional Growth Strategy (preferred growth alternatives), as would countywide planning policies and local comprehensive plans.

recognized the weakness of the draft plan (because it lacks an adequate array of specific policies and actions), then that should be stated and an analysis should be added which assesses the impacts that would result if a more robust suite of implementing policies and actions were incorporated into the plan.

In addition to enhancing the environmental review process, we have recommendations for specific policies included in the draft plan. On page 63, there is a statement that "half of the sources of greenhouse gas in this central Puget Sound region alone are related to transportation, primarily through the burning of gasoline and diesel fuel." The draft plan also notes that there "is a growing urgency in the region the nation, and internationally to reverse this trend." Yet despite recognition of this "growing urgency," the draft plan does not include a specific goal (let alone implementing policies and actions) to reverse this trend in this region. The plan should include a clear commitment and specific policies and actions to reduce vehicle miles traveled at the regional level in accordance with SB 6001.

Among the goals and policies listed on page 68, there should be one that states: "Prioritized transportation investments that connect regional centers, facilitate mobility within centers, **and result in less carbon emissions** while taking into account important regional factors such as vehicle miles traveled and surrounding land use patterns." A specific reference to the goals in SB 6001 should also be included.

On page 70, the discussion under "Greater Options and Mobility" should be written to read:

> To provide for the future mobility of the growing number of people living and working the region, the region will prioritize investments in efficiency, trip reduction, and more choices such as transit ferry services, trails, and bicycle lanes. With continued expansion of international trade and local increases in the movement of freight, goods and services, there will also be a need for additional port capacity, rail capacity, and freight access to manufacturing and warehousing areas.
>
> New mobility investments require funding, and funding is limited. Our region must consider its investments carefully, and prioritize its needs based on those investments which provide connections to centers, facilitate mobility within centers, and best supports new state carbon emission goals as well as new state goals to reduce vehicle miles traveled. For example, in the regions dense urban areas transportation capacity will be provided by expanding the region's high-capacity transit system and the pedestrian and

(Comment continues on following page)

Continuation of O-170-005

O-170-006

O-170-007

O-170-008

O-170-006 VISION 2040 has been revised to address this issue. The Transportation section now has a subsection entitled "Sustainable Transportation" that includes policies that address transportation and the effects of emissions. Furthermore, a new policy (MPP-En-20) calls for the region to support the goals in RCW 80.80.020. The remainder of the policies are under the sub-heading "Climate Change" (MPP-En-20 through MPP-En-25).

O-170-007 While this specific provision has not been included, VISION 2040 has been revised and includes stronger provisions related to greenhouse gas emissions. See response to O-170-006.

O-170-008 The transportation provisions and narrative have been revised.

bicycle networks. In rural areas, transportation investments must support compact walkable communities and preservation of open space and rural character. Missing links in our bicycle and pedestrian networks should be completed to improve local and regional connections. All transportation projects and programs need to consider long and short term impacts on climate and community health. In addition to transportation investments in centers and between centers…[No changes to the rest of the page are needed].

Continuation of O-170-008

The problems caused by greenhouse gas emissions are unlike any other environmental problems we have ever faced. As the DEIS notes, climate change spawned by greenhouse gas emissions may reduce forests in the Cascade Mountains by 20 to 50%; reduce snow packs with drastic changes to water availability which in turn will impact agriculture, salmon populations, and hydropower; increase winter floods; and raise water temperatures further disrupting whole ecosystems.

We have been digging this hole for ourselves for a long time. We do not have the luxury of continuing to dig this hole deeper. But instead of developing options for reducing our greenhouse gas emissions, all the alternatives contemplate further **increases** in greenhouse gas emissions. As a region and a society, we do not have the luxury of continuing on that path any longer.

Continuation of O-170-001

Alternatives that are consistent with SB 6001 (and our generation's obligations to the next generation) undoubtedly require bold action. Our transportation and land use planning efforts for decades have had only the slightest impact on the incessant increase in transportation-related greenhouse gas emissions. We have come to the point where much more significant action is needed. At minimum, we need to provide our elected officials and the public the information they need to chose between "more of the same" and a truly new course.

Transportation Choices and Defenders of the Environment are anxious to work with the PSRC and other stakeholders in developing a broader, more meaningful range of alternatives. Improved engine efficiencies and fuel pipes may help address this problem. But in the end those technological changes must be accompanied by major reductions in vehicle miles traveled to reduce emissions below 1990 levels. See The Urban Form and Climate Change Gamble, Frank, et al., *Planning*, (August/September 2007).

Continuation of O-170-003

O-170-001 (continued) See initial response to this comment.

O-170-003 (continued) See initial response to this comment.

Thank you for the opportunity to present these comments. We look forward to continuing our work with PSRC on these important issues. Feel free to contact Rob Johnson at Transportation Choices or me for more information.

Very truly yours,

BRICKLIN NEWMAN DOLD, LLP

David A. Bricklin

DAB:kmw

cc: Transportation Choices Coalition
Defenders of the Environment

Response to Comment Letter

Note: This page of comments does not require a response.

Comment Letter

O-128

From: Bryan Wahl [mailto:Bryan.Wahl@warealtor.org]
Sent: Wednesday, September 05, 2007 3:54 PM
To: Eric Schinfeld
Cc: jeanette.mckague@warealtor.org; Carol Naito
Subject: RE: HOUSING WORKING GROUP: Draft VISION 2040 comment letter

We appreciate the opportunity to provide comments on the Housing Work Group's comments on VISION 2040. We are extremely supportive of the points you have made in the letter, particularly the suggestions to strengthen the language in the housing actions section and the monitoring and measuring section.

We would like the subcommittee to consider adding the following comments:

1) A recommendation to make the housing section a separate chapter from the Development Patterns Chapter with the Actions/Monitoring and Measurement sections reflecting this change. Housing is a key GMA goal and should be a separate chapter to reflect its importance in meeting the needs of the existing and future population and job markets. This change will help enforce the importance of the regional housing strategy plan and monitoring efforts to ensure the region achieves VISION 2040 Housing goals. O-128-001

2) Workforce housing is a term being used today but is not part of the vocabulary in VISION 2040. We suggest the following changes to MPP-DP-32: O-128-002

MPP-DP-32 Achieve and sustain – through preservation, rehabilitation, and new development – an adequate supply of workforce, low-income, moderate-income and special needs housing that is equitably and rationally distributed through the region.

3) It is extremely important that as part of the overall policies, jurisdictions must have sufficient land capacity to meet the housing demands of both existing and future growth. The following policy should be included: O-128-003

MPP-DP-XX Local jurisdictions shall provide sufficient buildable land capacity to accommodate the number of housing units needed to accommodate existing and future growth.

4) We are concerned that the region is underplanning for the number of homes needed to accommodate projected growth. For instance, there is a recent trend in home sales which indicates 10 to 15 % of all home sales is for a 2nd home or vacation home. In order to plan for a sufficient supply of homes to accommodate projected growth, this factor must be taken into account. Therefore, we recommend a new policy be added to reflect this recent trend. O-128-004

MPP-DP_XX Local jurisdictions shall determine if they are experiencing or are likely to experience housing demands for 2nd homes or vacation homes. If this is determined to be the case, this shall be documented and the jurisdiction shall show that it can accommodate can accommodate all the housing demand for the projected population growth as well as the new trend for 2nd homes and vacation homes.

5) Finally, we also think it is important to be clear regarding what the regional housing strategy plan includes. While we felt the components were important, we believe they should be described in more detail in the VISION 2040 document. We recommend the following clarifications be offered: O-128-005

The **Puget Sound Regional Council**, together with its member jurisdictions, housing interest groups, and housing professionals will develop a comprehensive regional housing action strategy. This plan should include: ensuring a diversity of housing types and choices addressing the needs of rental and home ownership, income levels, demographic data, the adoption of local housing targets,

(Comment continues on following page)

Response to Comment Letter

O-128-001 Concur. The housing policies in VISION 2040 are now a separate section in Part III: Multicounty Planning Policies. The narrative discusses ways to produce a better jobs-housing balance. There also is a new policy in the Economy section that calls for incentives and investments to create a better jobs-housing balance.

O-128-002 VISION 2040 has been revised to address this by adding two new policies. MPP-H-2 includes the term "middle-income," and MPP-H-4 uses the term "workers at all income levels" to accommodate this request.

O-128-003 Issue best addressed at the local jurisdiction level through the Buildable Lands program.

O-128-004 See action on Buildable Lands program. Also, VISION 2040's Regional Growth Strategy distributed population, not housing units. When local governments plan for housing, they need to include a "market factor."

O-128-005 VISION 2040 has been revised to address this issue and calls for targets for housing. Also, the regional housing strategy work is included as an action. The specific tasks and work program for this action will be done as part of future work.

identification of best housing practices and innovations, and ensuring linkages between housing and land use, transportation and economic development. *(short-term)*

PSRC will develop and implement a program to monitor and encourage housing production, including affordable housing. The program will make planning for housing more transparent and shall include ~~consider~~ the following components:

- A regional housing monitoring program which includes monitoring the regional supply and demand for housing at all income levels and annually monitoring by county the net changes in job creation and net changes in the number of housing units.

- Develop a process for setting ~~l~~Local housing and affordable housing targets that includes steps to ensure reasonable measures are taken to make necessary adjustments when a jurisdiction is failing to achieve established goals.

- Review and comment on local housing and affordable housing targets and related provisions implemented in an effort to meet adopted targets through its existing authority for plan review and certification process. This will include a review of the number of housing units required to meet the demand over the 20-year planning period based upon the projected household size at the end of the planning period.

- Documentation of local housing strategies, i.e., a "show your housing work" provision. Jurisdictions will be asked to show how they plan to accommodate their housing targets and demonstrate consistency with housing and land use provisions in their comprehensive plans, including provisions of buildable land capacity through demonstration of housing units to be achieved through adopted zoning.

- Technical assistance and best practices to support local jurisdictions in developing effective housing strategies and programs. This will include assistance in analyzing the feasibility of buildable lands data, zoning and development regulations to accommodate projected growth at the local level.

(*mid-term*) (DP-31-37)

Thanks again for the opportunity to comment. Please let me know if you have any questions or need additional information.

From: Eric Schinfeld [mailto:ESchinfeld@psrc.org]
Sent: Wednesday, August 29, 2007 1:26 PM
To: rryder@ywcaworks.org; bill.longbrake@wamu.net; Bob Drewel; carla@housingconsortium.org; norm@kccha.org; tpcahc@qwest.net; housingsnohomish@gmail.com; kmann@uli.org; gened@cascadeland.org; heyward@impactcapital.org; mbrown@exec-alliance.org; luisassociates@comcast.net; Bill.Block@metrokc.gov; Bryan Wahl; sanderson@mbaks.com; hferris@lorig.com; dales@unicoprop.com; mcrowley@mbapierce.com; rbender@wslc.org;

Continuation of O-128-005
O-128-006
O-128-007
O-128-008
O-128-009
O-128-010

O-128-006 VISION 2040 has been revised to clarify that the monitoring program included in the document is a starting point. An action has been added that calls for future work to refine and improve the program.

O-128-007 VISION 2040 has been revised to clarify that the monitoring program included in the document is a starting point. An action has been added that calls for future work to refine and improve the program.

O-128-008 VISION 2040 has been revised to clarify that the monitoring program included in the document is a starting point. An action has been added that calls for future work to refine and improve the program.

O-128-009 VISION 2040 has been revised to clarify that the monitoring program included in the document is a starting point. An action has been added that calls for future work to refine and improve the program.

O-128-010 VISION 2040 has been revised to clarify that the monitoring program included in the document is a starting point. An action has been added that calls for future work to refine and improve the program.

leonardb@cted.wa.gov; stephanie.warden@metrokc.gov; asullivan@ci.bellevue.wa.us; adrienne.quinn@seattle.gov; JohnP@nwjustice.org; mike.stanger@co.snohomish.wa.us; mhubner@ci.kent.wa.us; Richard McIver; mliias@ci.mukilteo.wa.us; cary.bozeman@ci.bremerton.wa.us; eric.faison@cityoffederalway.com; Julie.Anderson@cityoftacoma.org; jlh22@u.washington.edu; david.graybill@tacomachamber.org; Ian.a.johnston@bankofamerica.com; lynt@vulcan.com; SteveL@seattlechamber.com
Cc: erik.strom@wamu.net; Carol Naito; waidr@kccha.org; robin.gardner@wamu.net; Olivia Robinson; kaee@cascadeland.org; katie@impactcapital.org; jtrupin@exec-alliance.org; Kays@unicoprop.com; jhays@wslc.org; ginny.fountain@seattle.gov; Frances.Youn@Seattle.Gov; jeknoian@u.washington.edu; ahoard@u.washington.edu; marylouhe@vulcan.com; caseyo@cascadeland.org; dans@cascadeland.org
Subject: HOUSING WORKING GROUP: Draft VISION 2040 comment letter

All,

Attached, please find the draft of the Prosperity Partnership Regional Housing Strategy Working Group's public comment letter on the Puget Sound Regional Council's VISION 2040. As you know, this is the first of two products (the second being our consensus strategies list) that the Working Group is charged with creating, and we'd like to send out a huge thank you to the subcommittee of representatives from each of the sectors who helped draft this letter.

The letter should reflect the consensus feelings and opinions of all members of the Working Group. As such, we are asking members to review the letter to ensure that you can support its content. If you find a statement that you cannot support, please reply back with specific recommendations for how to revise or otherwise treat the language/passage in the letter. Additional edits on grammar or phrasing are also welcome. For your reference, the VISION 2040 document itself is available online at http://www.psrc.org/projects/vision/pubs/draftV2040/index.htm, and the housing section is pages 48-51.

Please let me know if you have any edits by noon on Wednesday, September 5. At that point, we will work with the subcommittee to incorporate your changes, and then submit the letter by the public comment deadline of September 7.

If you have any questions, please let me know. Otherwise, I look forward to seeing you at next meeting on September 24 at 9:30 am, and I will be sending out meeting materials soon. Thanks, and best wishes.

Yours,

Eric Schinfeld
Associate Economic Policy Analyst
Puget Sound Regional Council/Prosperity Partnership
(206) 971-3053
www.psrc.org
www.prosperitypartnership.org

Note: This page of comments does not require a response.

Washington REALTORS®
Promoting expertise in real estate

O-143

September 7, 2007

Mr. Norman Abbott
Puget Sound Regional Council
1011 Western Ave., Ste. 500
Seattle, Washington 98104-1035

RE: Comments on VISION 2040

Dear Mr. Abbott,

Thank you for the opportunity to provide comments on the Draft VISION 2040 regional growth strategy for the Central Puget Sound communities. Washington REALTORS® recognize the many challenges facing the Central Puget Sound communities now and in the coming years as the region prepares to manage the considerable growth expected by the year 2040.

Washington REALTORS® has spent much time and effort in drawing attention to and finding state and local solutions to the quality of life issues facing our region, and in particular, the lack of variety of affordable housing choices available for the low to middle-income workers in our communities. We offer on behalf of our members, the following comments for consideration based upon our review of the Draft Vision 2040 document.

General Comments:

1) We appreciate the recognition and effort that has gone into intentionally designing a strategy that integrates the environment, land use, housing, transportation and economic development. These are the building blocks of our communities. When in balance, the result is a healthy environment, economic vitality, housing choices affordable for all income levels connected by an efficient infrastructure system.

   Importantly, the policies "provide for a range of housing types and choices to meet the housing needs" (DP-31); recognize the need to "achieve and maintain … an adequate supply … of housing" (DP-32); "expand the supply and range of housing" (DP-35); "provide an adequate supply of housing to support job creation" (Ec-18); and to "promote homeownership" (DP-33). To achieve these goals, the policies aim to "create consistent countywide targeting processes for allocating population and employment growth including establishing: a) local employment target, b) local

O-143-001

O-143-001 Thank you.

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housing targets based on population projections, and c) local housing and employment targets for each designated regional growth center." (DP-7).

Further, we are pleased the new policies recognize that jobs and housing concentrated in centers require transportation and other infrastructure to support the needs generated by this strategy, and funding must be prioritized to ensure these areas are served adequately.

Finally, throughout the document, it is very apparent that PSRC, in conjunction with members, will provide more leadership, oversight and assistance to ensure VISION 2040 is more than just a plan sitting on a shelf.

2) There are a number of significant state and federal activities occurring in the next two to five years that may impact VISION 2040 policies and actions. These activities include the submittal of the Buildable Lands Reports to the state, the Puget Sound Partnership, Climate Change, the 2010 Census update, and a number of smaller, more targeted studies for PSRC and other organizations relating to the environment, land use, transportation and the economy. Consideration should be given to tracking and monitoring the progress of these activities and a decision made to review the impact of these efforts on the policies and actions of VISION 2040 within the next three years and every five years thereafter. This timeframe is suggested due to the fact that there will be a significant amount of information generated during the next three years. The recommended review in succeeding five year increments is suggested due to the change in technology, science and information over time and the need to track progress and identify needed changes to achieve VISION 2040. This timeframe also allows adjustments to the VISION 2040 policies and actions as necessary. While the text discusses updating VISION 2040 prior to the amendment cycles for the countywide and local plans, it is recommended that this be included in the MPPs and the actions should include tracking the activities of the different levels of government that may impact the implementation of VISION 2040.

Recommendation: Add a new multicounty planning policy that reads:

MPP-A-X or MPP-A-2a: VISON 2040 policies and actions shall be reviewed by 2011, and every five years thereafter, and modified as necessary in response to the completion of significant studies and activities impacting the region. (Note: The countywide planning policy MPP could then be identified as MPP-A-2b)

Add another category of activities for tracking federal, state, regional and local actions that potentially could result in the modification of the policies and actions of VISION 2040. We suggest placing the following language: "Work with local jurisdictions to modify regional or local policies and implementing regulations, as necessary, to achieve VISION 2040" as a new item at the end of the section titled "Implementation Monitoring – Looking at "Inputs/Actions." (See page A-2-2)

O-143-002

O-143-003

O-143-002 VISION 2040 has been revised to address this issue. See new General policy MPP-G-3 and new General action G-Action-2.

O-143-003 See response to O-143-002.

Development Patterns Chapter: Proposed New Actions & Policy

3) A key to the success in implementing the VISION 2040 Strategy is identifying the characteristics of the population to be served over the next decades in the four county region. It has implications for the number, types, and location of housing units; skill levels for jobs; location of services for special needs; and the flexibility of the multi-modal transportation network to meet the mobility needs of the region in moving people, goods and services.

   Recommendation: Add a task item to "analyze characteristics of the population data to better identify the needs of the population and what is needed as we grow in the future" as a subset to the action item titled "Growth Targets: Housing and Employment" under the regional actions for development patterns on page A-1-4 of the Appendices document.

O-143-004

O-143-004 Comment noted. See revisions to DP-Action-8.

4) Another action item under the regional level for this chapter should include an analysis of the public and private sector policies, regulations, and financing requirements that act as barriers to accommodating the region's growth. There are several actions listed where the PSRC, member jurisdictions and others will be working together to look separately at growth targets, buildable lands and housing supply. The identification of barriers or constraints, including regulatory, may be one outcome of the work for each of these focused areas as well as for the regional actions identified for the Economic Development chapter. The barriers need to be gathered and reviewed from the big picture to determine unintended consequences that may adversely impact the policies and direction established in the VISION 2040 strategy.

   Recommendation: Add the following to the action items for each of the work groups to be formed: As part of the body of work for the various topical work groups, one task shall be to identify "barriers to success" which are recorded and reviewed for further action(s).

O-143-005

O-143-005 Comment noted.

5) Jurisdictions from time to time take legislative action that removes buildable land from production. Examples are critical areas, shoreline, and storm water ordinances. Often discussions surrounding the adoption of these ordinances occur without the benefit of a prepared analysis of the impact the new legislation has on a community's ability to house its future population and foster economic opportunities. The lost capacity to accommodate housing and employment opportunities needs to be provided elsewhere in the community or other policy choices need to be evaluated that do not jeopardize a community's ability to meet its housing and employment goals.

   Recommendation: Add the following new policy to the Land Use, Housing and Orderly Development Chapter:

O-143-006

O-143-006 See response to O-143-004.

(Comment continues on following page)

MPP-DP-XX When local jurisdictions adopt land use regulations that reduce the jurisdiction's capacity to accommodate needed housing units for its allocated population growth and projected employment growth, the jurisdiction shall recapture the reduced capacity by increasing residential densities elsewhere and/or identifying locations to absorb the lost employment capacity within the jurisdiction, in order to maintain the ability to achieve its allocated population growth and employment projections.

Continuation of O-143-006

Development Patterns Chapter, Part II: Housing

6) We agree with the text in the opening sections to the Housing section that "Housing is a basic need for every individual." The Growth Management Act (GMA) includes a housing goal which reads "encourage the availability of affordable housing to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock." The Act goes further under RCW 36.70A.070(2) to list a housing element as a mandatory element of comprehensive plans. In our own experience and in discussions with individuals in other associations, consultants, and others in state and local government, there is concern that housing elements are not receiving the focus and attention needed to ensure the housing goal is achieved. We have a housing affordability and availability problem in this region. We are not planning for the needs of the growing workforce and population. This is evidenced in tracking the flow of traffic in the morning and evening commutes. It seems appropriate that we recognize the importance of housing in meeting the needs of the population and employment growth projected for the Central Puget Sound area. Therefore, for these reasons we strongly recommend the Housing section become a stand alone chapter.

   Recommendation: Make the Housing section a separate chapter of VISION 2040.

O-143-007

7) The charts showing the differences over the years of the gross monthly income spent on housing costs is important. As noted in a comment session, more detail needs to be provided under the "affordability" section regarding the factors that went into creating the charts for both renters and homeowners in order to better understand costs for both groups. (See bottom of p.48 of the VISION 2040 document).

O-143-008

8) The Housing section does not discuss "workforce housing" even though this is a term frequently heard when discussing housing needs for various income levels. We suggest including this term in VISION 2040.

   Recommendation: Modify MPP-DP-32 to read as follows:

   MPP-DP-32 Achieve and sustain – through preservation, rehabilitation, and new development – an adequate supply of workforce, low-income, moderate-income and special needs housing that is equitably and rationally distributed through the region.

O-143-009

(Comment continues on following page)

O-143-007 VISION 2040 has been revised to address this issue. The housing policies in VISION 2040 are now a separate section in Part III: Multicounty Planning Policies.

O-143-008 Comment noted. VISION 2040 has been revised to address this issue. See the text added to the discussion regarding this chart.

O-143-009 VISION 2040 has been revised to address this issue. MPP-H-2 and MPP-H-3 include the term "middle-income," and MPP-H-14 uses the term "workers at all income levels" to accommodate this request.

In addition, include a definition of workforce housing as: Housing that is affordable to working households that do not qualify for subsidized housing, but cannot afford market-rate housing in their community. It is also defined as housing that is affordable to working households with incomes between 60 and 120 percent of area median income (AMI) for their Metropolitan Statistical Area (Note: This definition comes from a ULI publication on workforce housing).

9) Each jurisdiction needs to ensure there is sufficient buildable land available to meet both existing housing needs as well as a sufficient housing supply to accommodate future growth. While this requirement is self-evident for the four county region since each county falls under the Buildable Lands Counties, we believe the success of the vision warrants having this requirement be an explicit policy in the VISION 2040 plan. Therefore, we recommend a new policy be added to ensure suffient buildable land to meet existing and future housing needs of each of the jurisdictions.

   Recommendation: Add the following Policy:

   MPP-DP-XX Local jurisdictions shall provide sufficient buildable land capacity to accommodate the number of housing units needed to accommodate existing and future growth.

10) REALTORS® are concerned the region is under-planning for the number of homes needed to accommodate population growth. For instance, there is a recent trend in home sales which indicates 10 to 15 % of all home sales is for a 2nd home or vacation home. In order to plan for a sufficient supply of homes to accommodate projected growth, this factor must be taken into account. Therefore, we recommend a new policy be added to reflect this recent trend.

    Recommendation: Add the following policy:

    MPP-DP_XX Local jurisdictions shall determine if they are experiencing or are likely to experience housing demands for 2nd homes or vacation homes. If this is determined to be the case, this shall be documented and the jurisdiction shall show that it can accommodate all the housing demand for the projected population growth as well as the new trend for 2nd homes and vacation homes.

11) It is critical that as this region prepares to address the growth expected by the year 2040, we do not lose site of the existing unmet housing needs. The inability of workers to find housing close to where they work has led to sprawl in outlying portions of the four county region as well as into adjacent counties north, south, east and west of the region. This should be recognized so that both the existing and future needs of the four county area are addressed. This will help in meeting the needs of population growth and the existing and future employment needs. Therefore, it is recommended a policy be added to monitor the housing needs of the existing and future population and economic growth.

(Comment continues on following page)

Continuation of O-143-009

O-143-010

O-143-011

O-143-012

O-143-010 This issue was considered and, rather than add a new policy, VISION 2040 includes additional discussion in the narrative on this topic.

O-143-011 This issue was considered and rather than add a new policy, language was added in the text and to H-Action-2. Also, see the revisions to DP-Action-8.

O-143-012 This issue was considered and rather than add a new policy, the provisions in H-Action-1 and H-Action-2 were further developed.

Recommendation: Add the following policy:

MPP-DP-XX On-going monitoring of housing demands and supply shall be conducted on a regional and local level to ensure that existing and future housing needs generated by the region's population growth and economic growth are accommodated and sufficient housing is provided for all income levels.

Development Patterns Chapter, Part III: Elements of Orderly Development

12) While local governments do not control all the factors that create housing capacity in communities, they do control the timing of permit issuance and the steps needed to comply with the standards and requirements to build. The ease or lack of ease for the private sector to build impacts the capacity and supply of housing in communities.

Recommendation: Modify MPP-DP-45 to read as follows:

MPP-DP-45 Encourage jurisdictions to review and streamline development standards and regulations to advance their public benefit, provide flexibility, ~~and~~ minimize additional cost to housing, and minimize any adverse impacts to housing capacity and housing supply.

Economy Chapter: Policies

13) Housing the workforce close to employers is extremely important. It is important for employees to find affordable housing, whether rental or for ownership, close to where they work. This minimizes stress on the employee and their family due to long commutes and time away from home. And employers have happier, more productive employees. MPP-EC-17 begins to address this issue. However, it leaves out an important component: the location of homes for the workforce should be located close to where they work. In addition, this policy needs to be monitored. (Note: This policy should be tied to MPP-DP-37 and associated actions).

Recommendation: Modify MPP-EC-18 as follows:

MPP-EC-18 Provide an adequate supply of housing choices to support job creation and economic growth located close to places of employment at prices affordable to the workforce. Each jurisdiction should identify the number of jobs planned for within the community and determine the number of homes needed to achieve a balance with projected employment growth.

Continuation of O-143-012

O-143-013

O-143-014

O-143-013 This issue was considered and the policy kept as written.

O-143-014 VISION 2040 has been revised to address the issue of good access to employment centers. What is now MPP-Ec-18 was revised. Also, a new policy has been added to advance incentives and investments to create a closer balance between jobs and housing.

Appendix I Actions
Development Patterns Actions

14) The state Office of Financial Management (OFM) and the Department of Community, Trade and Economic Development are providing local governments with annual information on the change in job creation and the change in housing units. The action item related to Housing supply should be modified to include a requirement to review this data annually.

Housing Supply – Regional Level Actions

15) We agree with the general action items for housing. However, we believe it is important to provide guidance on what the regional housing strategy addresses. Leaving the item stating that various groups will get together to develop a strategy without some guidance on what the strategy should accomplish may result in a strategy that falls short of the region's needs. Therefore, we have proposed additional language for the strategy. In addition, because monitoring is so crucial, we have added language for further guidance.

The **Puget Sound Regional Council**, together with its member jurisdictions, housing interest groups, and housing professionals will develop a comprehensive regional housing action strategy. This plan should include: ensuring a diversity of housing types and choices addressing the needs of rental and home ownership, income levels, demographic data and income levels, the adoption of local housing targets, identification of best housing practices and innovations, and ensuring linkages between housing and land use, transportation and economic development. *(short-term)*

PSRC will develop and implement a program to monitor and encourage housing production, including affordable housing. The program will make planning for housing more transparent and shall include ~~consider~~ the following components:

- A regional housing monitoring program which includes monitoring the regional supply and demand for housing at all income levels and annually monitoring by county the net changes in job creation and net changes in the number of housing units.
- Develop a process for setting ~~L~~local housing and affordable housing targets that includes steps to ensure reasonable measures are taken to make necessary adjustments when a jurisdiction is failing to achieve established goals.
- Review and comment on local housing and affordable housing targets and related provisions implemented in an effort to meet adopted targets through its existing authority for plan review and certification process. This will include a review of the number of housing units required to meet the demand over the 20-year

(Comment continues on following page)

O-143-015

O-143-016

O-143-017

O-143-015 Each year, PSRC has published two "Trend" articles on housing. One addresses building permit activity, and the other addresses affordability.

O-143-016 VISION 2040 has been revised to address this issue. See the Housing actions. The details of an action will be addressed in future work programs and budgets.

O-143-017 VISION 2040 has been revised to address this issue. See the Housing actions and monitoring program.

planning period based upon the projected household size at the end of the planning period.

- Documentation of local housing strategies, i.e., a "show your housing work" provision. Jurisdictions will be asked to show how they plan to accommodate their housing targets and demonstrate consistency with housing and land use provisions in their comprehensive plans, including provisions of buildable land capacity through demonstration of housing units to be achieved through adopted zoning.

- Technical assistance and best practices to support local jurisdictions in developing effective housing strategies and programs. This will include assistance in analyzing the feasibility of buildable lands data, zoning and development regulations to accommodate projected growth at the local level. (*mid-term*) (DP-31-37)

Continuation of O-143-017

Economy Actions-Regional Level

16) One of the policies states there should be an adequate housing supply to support job creation and economic growth. We agree with this policy and believe a measure should be developed to track how we are doing in terms of supplying housing that is affordable by the workforce, given the wages they earn. Therefore, we suggest adding an action item.

Recommendation: Add the following action item:

The Puget Sound Regional Council, together with its member jurisdictions, will develop a mechanism to measure location and the amount of housing affordable given the wages being paid to the workforce.

O-143-018

17) The Puget Sound Regional Council, together with its member jurisdictions, will develop and provide information and a tool kit to help local jurisdictions to better utilize available infrastructure funding tools. This should be reflected as part of the transportation action items.

Recommendation: Modify the transportation action item on funding sources as follows:

Transportation Actions – Regional Level
Transportation Funding Sources

The **Puget Sound Regional Council**, together with its member jurisdictions, shall investigate existing and new sources of funding for transportation facilities and services to assist local governments and transportation agencies for maintenance and

O-143-019

O-143-018 Comment noted. See H-Action-1 and H-Action-2.

O-143-019 See the fiscal policies in the General policy section of Part III: Multicounty Planning Policies.

operations, as well as facilities and services to serve future development in a manner consistent with the regional VISION. *(short-term)*

The **PSRC** will provide technical assistance, information and a tool kit to help local jurisdictions maximize the use of available infrastructure funding tools. (*short-term*)
Results and Products: New or expanded funding for transportation

18) Transportation funding needs to be used strategically to ensure infrastructure projects provide the capacity to address the needs of future growth. Criteria should be added to the state's transportation funding criteria that directs funding to ensure capacity projects that accommodate growth get priority.

Recommendation: Modify the transportation action item on funding criteria as follows:

Revise Transportation Funding Criteria

The **Puget Sound Regional Council** will relay to state agencies and the Legislature on the goals and objectives of the regional vision, in order to address useful changes in funding criteria to ensure that investments in transportation facilities and services advance the regional VISION, particularly projects in or connecting centers. In addition, the **Puget Sound Regional Council**, together with its members, shall develop recommendations on criteria to direct transportation funding to infrastructure projects that increase capacity necessary to accommodate projected growth *(short-term)*
Results and Products: Letter (or other reporting) to Legislature and state agencies

O-143-020

Thank you for the opportunity to provide comments. This has been a huge undertaking and we commend the Council and staff for all the work that has gone into this effort to date. Please feel free to contact our Government Affairs Director, Bryan Wahl, at (360) 561-9636 with any questions.

Sincerely,

Dennis Rose

Dennis Rose
President, Washington REALTORS®

Cc: Greg Wright, Vice President, Government Affairs, Washington REALTORS®
Phil Harlan, Chair, Legislative Steering, Washington REALTORS®
Steve Francks, CEO, Washington REALTORS®
Bryan Wahl, Government Affairs Director, Washington REALTORS®
Bill Clarke, Policy Director, Washington REALTORS®
Jeanette McKague, Asst. Director of Land Use/Planning, WA REALTORS®

O-143-020 This issue was considered and the language kept as written.

Robin McClelland

From: Rocky Piro
Sent: Monday, September 10, 2007 5:50 PM
To: Robin McClelland
Subject: FW: PSRC - VISION 2040 - REALTORS Comment Letter
Importance: High

This is a 2nd letter from Bryan – different from O-128.

From: Bryan Wahl [mailto:Bryan.Wahl@warealtor.org]
Sent: Friday, September 07, 2007 3:34 PM
To: Norman Abbott
Cc: dennis@dennisrose.com; Edgecrs@aol.com; steve.francks@warealtor.org; gwag2001@yahoo.com; Jan@JanEllingson.com; BRiley@brc-homes.com; bill.clarke@warealtor.org; jeanette.mckague@warealtor.org; Rocky Piro; Carol Naito; SamPace@concentric.net; philharlan@philharlan.com
Subject: PSRC - VISION 2040 - REALTORS Comment Letter
Importance: High

Mr. Norman Abbott
Puget Sound Regional Council
1011 Western Ave., Ste. 500
Seattle, Washington 98104-1035

RE: Comments on VISION 2040

Dear Mr. Abbott,

Thank you for the opportunity to provide comments on the Draft VISION 2040 regional growth strategy for the Central Puget Sound communities. Attached, please find the REALTORS comment letter (hard copy sent via mail).

Washington REALTORS® recognize the many challenges facing the Central Puget Sound communities now and in the coming years as the region prepares to manage the considerable growth expected by the year 2040.

Washington REALTORS® has spent much time and effort in drawing attention to and finding state and local solutions to the quality of life issues facing our region, and in particular, the lack of variety of affordable housing choices available for the low to middle-income workers in our communities. We offer on behalf of our members, the following comments for consideration based upon our review of the Draft Vision 2040 document.

Thank you again for the opportunity to provide comments. This has been a huge undertaking and we commend the Council and staff for all the work that has gone into this effort to date. O-143-021

Upon your review, please let me know if you have any questions or need additional information.

Best regards,

Bryan Wahl
Director, Government Affairs
Washington REALTORS®

O-143-021 Thank you.

Comment Letter

T-125

Robin McClelland

From: Sheila Rogers
Sent: Friday, September 07, 2007 12:52 PM
To: Robin McClelland
Subject: FW: Comments response

From: Ian Kanair [mailto:Ian@snoqualmienation.com]
Sent: Friday, September 07, 2007 12:37 PM
To: Sheila Rogers
Cc: Matt Mattson
Subject: Comments response

Hello,

In response to the call for comments on 40 year VISION, I would like, on behalf of the Snoqualmie Tribe Environmental and Natural Resources [ENR] Department to note the following:

The ENR Department of Snoqualmie Tribe would like to express an interest in having the opportunity to participate and have a voice in the long range planning for the (Puget Sound) Region. Given that the Tribe has many areas of interest within the region, it makes sense from a planning perspective, to involve the Tribe at early stages of planning for projects and activities, to protect areas of environmental and cultural sensitivity, and to provide input on appropriate and sustainable practices.

Our Department would like to request involvement in this process, including receiving ongoing notices of meetings and participation opportunities, as well as opportunities for comments and feedback, coordination and consultation.

Please feel free to contact me at the address below, or by email, for follow-up on these important processes.

Thank you,

Ian Kanair
Environmental and Natural Resources Department Director
Snoqualmie Tribe
8130 Railroad Avenue, Suite 200
P.O. Box 969
Snoqualmie, WA 98065

T-125-001

9/7/2007

Response to Comment Letter

T-125-001 Concur.