

Appendix II.D: Comments and Response to Comments on the Draft Environmental Impact Statement

This appendix contains all of the comment letters submitted on the Draft Environmental Impact Statement (submitted during the May through July 2007 comment period), and provides a response to each comment within each comment letter.

1. Comment Letter, by Commenter Type

Commenter	Letter #	Page #
BUSINESS (3)		
Halcyon Planning & Urban Design	B-002 ¹	p. 6
MIRAVEST, INC	B-003	p. 8
Puget Sound Energy	B-004	p. 9
GOVERNMENT		
City Government (29)		
City of Auburn	C-001	p. 11
City of Bainbridge Island	C-002	p. 14
City of Bellevue	C-003	p. 17
City of Bothell	C-004	p. 25
City of Des Moines	C-005	p. 29
City of Edmonds	C-007	p. 33
City of Everett	C-008	p. 38
City of Issaquah	C-009	p. 42

¹ There is no comment letter B-001 as it was re-assigned to a different commenter type after it was initially numbered as B-001.

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Cities of Issaquah, Redmond, Sammamish	C-010	p. 46
City of Kenmore	C-011	p. 48
City of Kirkland	C-012	p. 53
City of Lake Stevens	C-013	p. 55
City of Lakewood	C-014	p. 59
City of Lynnwood	C-015	p. 65
City of Mukilteo	C-016	p. 69
City of Newcastle	C-017	p. 83
City of Puyallup	C-018	p. 85
City of Redmond	C-019	p. 87
City of Sammamish	C-020	p. 90
City of SeaTac	C-021	p. 92
City of Seattle, Planning Commission	C-022	p. 98
City of Seattle	C-023	p. 100
City of Snohomish	C-024	p. 106
City of Stanwood	C-025	p. 108
City of Sumner	C-026	p. 110
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Kitsap County Public Works Department	Y-004	p. 143
Pierce County	Y-005	p. 144
Snohomish County	Y-006	p. 147
Snohomish County Planning and Development Services	Y-007	p. 157
Snohomish County Public Works	Y-008	p. 159
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Water District #111, King County	R-001	p. 161
Port of Seattle	R-002	p. 163
Public Health-Seattle/King County	R-003	p. 169
Puget Sound Clean Air Agency	R-004	p. 171
Snohomish County Tomorrow	R-005	p. 180
Soos Creek Water & Sewer District	R-006	p. 187

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Tacoma-Pierce County Chamber of Commerce	O-014	p. 309
Transportation Choices Coalition	O-015	p. 318
University of Washington, Climate Impacts Group	O-016	p. 321
Public Interest Transportation Forum	O-017	p. 326

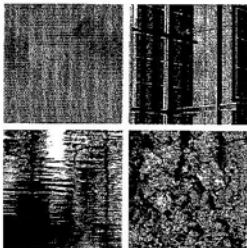
TRIBES (0)

None	-	-
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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.





VISION 2020 Update Draft Environmental Impact Statement

Comment Form

What's your vision for the future of the central Puget Sound region? We want your input and need to hear from you!

The public comment period ends on Monday, July 31, 2006.

The public is encouraged to provide thoughts, ideas, and concerns on the Draft Environmental Impact Statement to help select a preferred growth alternative. Comments should 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 vision2020update@psrc.org.
- By attending any of PSRC's board or committee meetings. 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 develop a preferred alternative. 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/datapubs/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 AMY TARCE

ORGANIZATION HALCYON PLANNING & URBAN DESIGN

ADDRESS 15311 NE 62nd COURT

CITY REDMOND STATE WA ZIP 98052

E-MAIL halcyonplanc@msn.com

☒ Check here if you would like to be added to the project mailing list.



YOUR INPUT IS NEEDED

The region has some tough choices to make to get from four broad alternatives to a single vision that reflects our shared values and aspirations. Participants in the review process are asked to comment on the growth alternative that appears to best meet the needs of the region. You are welcome to mix and match portions of the alternatives that have been included in the Draft Environmental Impact Statement to form a hybrid that represents an alternative you prefer.

PLEASE CONSIDER COMMENTING ON THE FOLLOWING SUBJECT AREAS:

1. The environmental baseline (see Chapter 2)
2. The growth distribution alternatives — including ideas for a Preferred Growth Alternative (see Chapter 4)
4. Environmental justice (see Chapter 6)
3. Discussion of multicounty planning policies (see Chapter 7)

COMMENTS:

- B-002-001** 1. Sustainability implies planning for the next generation.
Consider a 100-year plan as a BOLD plan.
- B-002-002** 2. The Metropolitan Cities Alternative is more conducive for achieving environmental justice while providing choices for settlement for the Puget Sound Population.
- B-002-003** 3. The PSRC should strongly support high capacity train service for the region as a way to provide choices for housing.
4. ~~Do the population~~ The Metropolitan Cities Alternative and larger Cities Alternative should set aside open space for human recreation ~~even as~~ ^{even} This becomes ^{more} important if base densities in these urban centers are increased dramatically.
- B-002-004** 5. We need to look at the true cost of growth in a 100-year time frame. Our current assumption that ~~unassisted~~ ^{can} growth be concentrated where public infrastructure exists is only viable thru the life cycle of these infrastructure ~~even~~ What happens when these infrastructure become obsolete in 20 years, 50 years or 100 years?

PLEASE ADDRESS COMMENTS TO:

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

B-002-001

One of PSRC's goals for VISION 2040 is sustainability. Elements such as the environmental framework and the development of environmental multicounty planning policies is helping to lay the groundwork. With VISION 2040, PSRC is planning for the next generation. At the same time, the plan needs to be realistic and implementable, which is why PSRC has chosen to include actions and measures.

B-002-002

Thank you for indicating your preference for a focused growth alternative. A hybrid of focused growth was selected.

B-002-003

Thank you for your suggestions. The FEIS includes these and other similar measures as potential mitigation, and the multicounty planning policies also provide supporting policies encouraging high capacity transit and open space conservation.

B-002-004

See the VISION 2040 Issue Paper "The Costs of Sprawl" in FEIS Appendix I-F. In the FEIS, the Public Service and Utilities section discusses the potential that existing infrastructure would need to be expanded and replaced if growth continues within already developed areas, and that new infrastructure would be needed in areas that are not currently developed. Also, see response to 002-001 regarding the time frame.



From: "Miravest" <miravest@callatg.com>
To: <vision2020update@psrc.org>
Date: Wed, Jun 7, 2006 3:45 PM
Subject: Growth Survey Response

Having looked briefly at the four alternatives and in answer to your request for opinions, the following is my choice:

B-003-001 Larger Cites. This appears to be a moderate approach building upon the existing metro infrastructure while giving some flexibility to smaller urban areas to grow in an independent manner. Thanks for the report and opportunity to respond.

Regards,

Michael Rabstoffs, President

MIRAVEST INC

1145 Broadway Plaza, Suite 1300

Tacoma, WA 98402

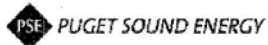
Tel. 253.284.2844

Fax. 253.284.2845

<mailto:mrabstoffs@miravestinc.com> mrabstoffs@miravestinc.com

B-003-001

Thank you for noting your preferences among the alternatives.



July 31, 2006

Puget Sound Regional Council
1011 Western Ave, Suite 500
Seattle WA 98104-1035

Attn: Mr. Norman Abbott,
State Environmental Policy Act (SEPA) Responsible Official

RE: PSE Comments to Vision 2020 Updated
Draft Environmental Impact Statement

Dear Mr. Abbott,

Puget Sound Energy (PSE) appreciates the opportunity to comment on the Puget Sound Regional Council's (PSRC) Draft Environmental Impact Statement (DEIS) for the Updated Vision 2020. PSE commends the efforts by the PSRC to engage the citizens and businesses of the region in the update of such a valuable document.

PSE is an investor-owned gas and electric utility providing service to more than 1 million electric and 700,000 natural gas customers within an 11-county service area. Within this customer base, approximately 70% of its electric customers and 93% of its gas customers are located within the 4-county region described in the Vision 2020 plan.

As recognized in the DEIS, population and employment growths in the region will increase significantly, with over 1.6 million new residents and 1.1 million new jobs created by 2040.

With this growth comes a higher demand for energy. Fundamentally, PSE expects to meet the energy needs of its growing customer base through incremental, cost-effective energy conservation, low-cost procurement of sustainable energy resources, and prudent investment in the energy-delivery infrastructure. Our customers, key constituents and communities expect state-of-the-art services, they expect us to be environmentally sensitive, and they expect us to offer aggressive energy efficiency programs. Effective planning, coordination and integration of our generation and related delivery and fuel supply services will be required to meet this expectation.

B-004-001

Thank you for your comment providing additional background on PSE's services and operations in the region, including your strategies for meeting future energy demand as the region grows. The conservation theme in your comments is consistent with the policies in VISION 2040.

B-004-001

B-004-002

PSE generally agrees with the DEIS assessment that the four growth alternatives all result in approximately the same increase in load growth. It is important to recognize that each alternative requires PSE to strengthen its gas and electric transmission system by constructing new facilities to pick up new load demand as well as to continue to provide reliable service to its existing customer base. Each alternative does place unique challenges on PSE. Siting of the facility infrastructure, including transmission and distribution lines and its associated electrical substations and gas regulator stations require adequate space for construction and operation.

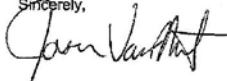
B-004-003

In alternatives that focus growth in more concentrated areas (i.e. Metropolitan, Larger Cities), significant challenges occur in finding suitable corridors and sites for new, and more commonly, upgraded facilities in areas already congested and densely built. Other alternatives (i.e. Smaller Cities) require new extensions to serve more widespread growth, often in areas that are more environmentally sensitive. It is imperative that as the density in the Puget Sound Region increases, local cities and counties recognize the need for PSE to meet growing demands and further develop existing utility corridors as well as create new utility corridors. This requires local governments to consider utility needs when planning, designing and constructing new and expanded transportation roadway systems. Early and consistent coordination is essential to ensure that utility infrastructure needs are in place to meet the energy requirements of the growing population and businesses, when they need it.

Hopefully, PSE's comments are helpful in the development of the updated VISION 2020 plan. Careful planning and coordination between the region's governments and utility sector will ensure adequate, cost effective services are in place to support the region today and in 2040.

If you have any questions, please feel free to contact me at 425-462-3820 or at jason.vannort@pse.com or Susan Hempstead at 425-462-2838 or at susan.hempstead@pse.com.

Sincerely,



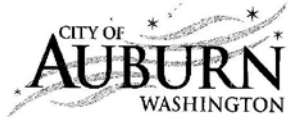
Jason Van Nort
Local Government & Community Relations Manager
Puget Sound Energy

B-004-002

PSRC agrees with the statement that the alternatives, as they could be implemented, will affect existing as well as new infrastructure. In addition to the discussion of energy demand provided in Chapter 5.10, these issues for utilities are discussed in Chapter 5.7 public services and utilities.

B-004-003

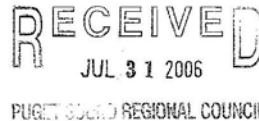
Thank you for your observations. The FEIS includes your suggested mitigation measure for providing for coordinated planning with transportation and other corridor improvements.



Peter B. Lewis, Mayor

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

July 27, 2006



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

SUBJECT: VISION 2020 Update - Comments on Draft Environmental Impact Statement (DEIS)

Dear Mr. Abbott:

Thank you for the opportunity to review and comment on the Puget Sound Regional Council (PSRC) VISION 2020 Update Draft Environmental Impact Statement (DEIS). Clearly, a considerable amount of work has gone into the DEIS's preparation and PSRC's effort in producing the document is to be commended.

At the outset, we note that the proposal's application to a geographically broad, four county area means that the EIS analysis is general. It does not therefore lend itself well to geographically specific (i.e. Auburn) analysis of impacts. Based on that, our comments tend to be equally general, but do reflect certain guiding principles that should be the basis for further analysis, the selection of a preferred alternative and updates to the multi-county planning policies.

Our comments, then, are as follows:

- C-001-001** 1. All four DEIS alternatives assume a similar level of population (additional 1.6 million) and employment (additional 1.1 million jobs) growth during the plan's time horizon. Applying a consistent growth assumption across all four alternatives would not appear to truly provide the best analysis for the region in selecting a preferred growth alternative, especially given the region's inability to adequately fund infrastructure to support such growth. For this reason, we see the alternatives themselves as being flawed.

As an example, several years ago when the region attempted the first Regional Transportation Investment District (RTID) package it was determined that, when city and county arterial capacity improvements were considered, the package would cost about \$9 billion. After some two years of negotiating and removing all city and county arterials from the list, the total package was reduced to \$6 billion. So by 2007, when the Sound Transit and RTID joint package may go to a public vote there will already be at least \$3 billion in unfunded local arterial capacity projects.

Not only is the issue specific to transportation, but the DEIS itself also raises questions about the region's ability to provide adequate water supply to support future growth. With respect to water the DEIS states,

C-001-001

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.

The Supplement Draft EIS and Chapters 3 and 4 of the Final EIS included additional discussion of how the VISION update responds to and supports the requirements of the Growth Management Act, both at the regional, county, and local levels.

AUBURN * MORE THAN YOU IMAGINED

C-001-001	<ul style="list-style-type: none"> Current water supply may not be sufficient and could require upgrades to some systems perhaps by 2020. Additional supply will potentially be needed by 2020; and, Impacts could be more severe in areas not currently planning for major increases, as water rights processes are complex and extensions are costly.
C-001-002	One of the GMA State planning goals is the provision of adequate public facilities and services to support growth. The DEIS alternatives therefore need to recognize this and need to be tied concurrency which is, as you know, one of the primary features of the Growth Management Act (GMA). The ability of the alternatives to satisfy concurrency should be one of the key evaluation criteria. The region may not be able to accommodate the projected level of growth if concurrency requirements cannot be met since adjustments to land use plans may be required.
C-001-003	Given the difficulties within funding transportation and other improvements in the region, and given that the DEIS concedes additional water supply will be needed by 2020 (keep in mind the time horizon of this update is 2040), then the DEIS analysis needs to be supplemented with an alternative that starts out with an assumption of no growth (or at most growth to the levels anticipated in current local plans to the year 2020-2025). Such an alternative instead could emphasize sustainable communities. Additional growth alternatives could then be generated that make assumptions about the availability of funding to support infrastructure needs and, inherently, more growth. This is a much more practical approach to evaluating growth within the framework of the GMA itself. It also recognizes the practical realities of funding (or lack thereof) and providing necessary public facilities and services for the region.
C-001-004	2. The DEIS should discuss and include criteria that consider how each alternative would affect regional and countywide funding policies. Currently, nearly all funding that is administered by PSRC is based on the Urban Centers/Connecting Corridors concept. In theory, this is aligned with the region's current growth plan and policies. Yet, again, the funding is inadequate to actually mitigate the growth that is occurring under Vision 2020. Therefore, the DEIS needs to discuss which growth alternative best matches available funding with that growth scenario, and what affect would there be if the PSRC departed from the current transportation funding criteria in order to support a new preferred growth alternative?
C-001-005	3. There has been discussion about establishing a certification process for local comprehensive plans beyond the transportation element (e.g. possible certification of the housing elements). We have concerns about additional mandates and certification processes on local governments that may be an outcome of the VISION 2020 Update process. Does the selection of any one preferred growth alternative lend itself to more possible mandates on local governments that another alternative?

C-001-002

Given the regional scale of the alternatives, satisfying local concurrency standards would not be appropriate, and is best done in subsequent local planning.

C-001-003

See response to comment C-001-001.

C-001-004

The FEIS discusses the issue of cost under all of the alternatives. Also, VISION 2040 contains goals, policies and actions that discuss how regional and other funding sources are to be prioritized. Note that the existing centers concept is maintained in VISION 2040's regional growth strategy.

C-001-005

Neither VISION 2040 nor the alternatives introduce mandates, although they do provide for improved guidance and collaboration among the communities in the region. The Final EIS chapters 3 and 4 clarify the purpose of the update and the planning context.

C-001-006

4. The "Growth Targets Extended" alternative, which is based on current comprehensive plans that reflect the current VISION 2020 document, creates more adverse impacts in certain areas such as transportation, water quality/hydrology and air quality than at least two of the other alternatives. This implies that the existing adopted VISION 2020 document, which current comprehensive plans are generally based upon, has the region going down a path that creates more adverse environmental impacts than the other alternatives. Are the other growth alternatives really, then, truly "refinements" to the current VISION 2020 Plan or do they instead represent substantive policy changes from where the region has been heading. And if there are substantive policy changes, the VISION 2020 Update process should very clearly identify them so that they are transparent and discussed.

C-001-007

5. The selected preferred growth alternative should recognize and acknowledge the considerable effort and public process local jurisdictions have already made to identify community values and visions and adopting plans that reflect these visions. The selection of a preferred growth alternative which makes a significant departure from the effort that has been done to date would only be detrimental to local planning efforts.

C-001-008

6. There has been discussion of possibly using the multi-county planning policies as a basis for establishing a quantitative minimum density requirement. We oppose the use of the multi-county planning policies for this purpose and believe that such decisions about how to allocate growth assignments within a jurisdiction are best left to local discretion.

Thank you again for the opportunity to comment on the VISION 2020 update DEIS. Please contact David Osaki, Community Development Administrator, at (253) 804-5034 should you have questions or require additional information.

Sincerely,



Peter B. Lewis,
Mayor

cc: Auburn City Council
Dennis Dowdy, Public Works Director, City of Auburn
David Osaki, Interim Planning, Building & Community Director, City of Auburn
Tiffin Goodman, Transportation Planning and Grants Manager, City of Auburn
Dave Baron, Economic Development Manager, City of Auburn
Suburban Cities Association
Valley Cities Mayors

C-001-006

The Preferred Growth Alternative combines many of the the best elements of the alternatives studied in the Draft EIS, including Growth Targets Extended. As such, it builds upon existing policies and trends.

C-001-007

The Preferred Growth Alternative builds upon local plans. Further, implementation of the PGA will be accomplished through local plans, which provides the opportunity to ensure that the regional VISION is implemented in a manner responsive to local characteristics.

C-001-008

VISION 2040 and its regional growth strategy do not include a numeric minimum density threshold.



CITY OF BAINBRIDGE ISLAND
Department of Planning and Community Development

July 31, 2006

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
Puget Sound Regional Council

RE: Comments on the *VISION 2020 Update DEIS*

Dear Mr. Abbott,

Thank you for allowing us the opportunity to review the Puget Sound Regional Council's *Vision 2020 Update Draft Environmental Impact Statement* (DEIS). The document is comprehensive, well formatted, and is easy to read.

The City has the following comments regarding the DEIS, the growth distribution alternatives and the expected impacts.

C-002-001 | The DEIS does not clearly state up front the relationship of the *Vision 2020 Update* and the requirements of the Growth Management Act (GMA) in respect to accommodating forecasted population growth. It should be clearly stated that the *Vision 2020 Update* is a regional planning document intended to use growth forecasts for the purposes of regional transportation and employment planning, and that growth distribution alternatives outlined in the DEIS for the *Vision 2020 Update* are not providing cities and counties with required GMA growth allocations, which are in fact provided to counties by the State Office of Financial Management.

In chapter 3, page 3.5, it states that "The Regional Council is required to review local jurisdiction's plans and amendments and certify that they comply with the GMA, and are consistent with regional guidelines and principles for planning." However, it should be clarified that the PSRC is not a regulatory agency, and that the role of PSRC in reviewing comprehensive plans for jurisdictions in the central Puget Sound region is limited and does not include approving comprehensive plans or providing population allocations for comprehensive planning purposes, and that "certification" of jurisdictions' plans are for purposes of regional transportation consistency and eligibility of federal dollars.

C-002-002 | Also on page 3.6, it should be clarified that consistency with Multicounty Planning Policies is not a GMA requirement for Kitsap County and their cities, but voluntary (RCW 36.70A.210(7)).

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www.ci.bainbridge-island.wa.us

C-002-001

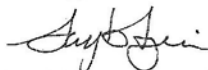
VISION 2040 now contains statements noting both of these issues, with text describing how the regional growth strategy is to be used as well.

C-002-002

The requirements related to multicounty planning policies are more clearly stated in VISION 2040.

- C-002-003** In respect to the four growth distribution alternatives analyzed in the DEIS, the impacts of the Larger City Alternative and Smaller City Alternative both have significant adverse impacts on the regional strategy as adopted in the original *Vision 2020*. For the City of Bainbridge Island, both of these alternatives significantly depart from our growth strategy adopted in our comprehensive plan, which include concentrating 50% of the new growth into Winslow area.
- The Larger Suburban City alternative would project a population on Bainbridge Island that is significantly above the growth target being used in our comprehensive planning process. In the Larger City Alternative, 30% of the new growth is targeted to designated "larger cities" and Bainbridge Island is the only city in Kitsap County with that designation. This would approximately double the projected growth which our comprehensive plan is expected to accommodate. A major concern for Bainbridge Island is the availability of water and the population projection for the larger suburban city option may exceed the quantity of water that can be supplied from Island aquifers. Although the Larger City alternative would have a significant impact for Bainbridge Island, it appears that since the DEIS is looking at impacts at a more regional level, the impact to ground water resources of cities such as Bainbridge Island is not analyzed in chapter 5.7, Public Services and Utilities.
- C-002-004**
- C-002-005** The smaller City alternative would result in a population that is significantly less than the population projection for which the City of Bainbridge Island is planning and, due to the existing subdivided land patterns, it would be very difficult for Bainbridge Island to develop policies that limit growth to this target. This impact is mentioned in the land use analysis section of the DEIS.
- C-002-006** The transportation impacts of the four alternatives should look more closely at how the State's ferry system will serve the growing population for the central Puget Sound region, particularly Kitsap County. It is welcome to see the ferry system defined as both a marine highway and high-capacity transit system, but it is unclear how the DEIS addresses the ferry system in the "regional level indicator" analysis and how the ferry system might affect growth on a regional level.
- C-002-007** The DEIS analysis clearly shows that the Metropolitan Cities Alternative would most closely achieve the vision of the region's long-range plan encompassed in *Vision 2020* by concentrating new jobs in existing employment centers, focusing population growth in the regions major cities, and thereby providing the opportunity to serve the region with the most economical high-capacity transit system. We commend the PSRC for a very comprehensive document and look forward to participating in the selection of a preferred alternative.

Sincerely,



Larry K. Frazier, AICP Planning Director

cc: Mayor Darlene Kordonowy
Mary Jo Briggs, City Administrator
Mary McClure, Executive Director, Kitsap Regional Coordinating Council

C-002-003

Thank you for providing your observations about the changes that the Larger Cities and Smaller Cities alternatives could involve for the City of Bainbridge Island. These types of local agency comments were a consideration for PSRC in defining the Preferred Growth Alternative. Please be aware that in response to comments, the Growth Management Policy Board has revised the level of definition for all alternatives, removing specific population and employment designations for individual cities and local geographic areas. However, since the general growth patterns of each alternative is unchanged, the types of issues and impacts for affected cities would remain as stated in the DEIS. For any of the alternatives, decisions about specific growth targets for individual cities would still be determined through existing GMA planning processes.

C-002-004

It is correct that the broad regional scale of the alternatives and the analysis does not support a detailed identification of needs or a review of the limiting factors for individual jurisdictions. However, the FEIS notes that some jurisdictions will face challenges to providing needed infrastructure, including in some cases water, particularly for jurisdictions that already experience limitations in available water supply. VISION 2040 addresses the need to provide funding to help cities accommodate growth.

C-002-005

Comments such as these lead PSRC to revise the definition of the alternatives and they are no longer including figures at the individual city level. See response to C-002-002.

C-002-006

VISION 2040 used the adopted metropolitan transportation plan, Destination 2030, as the transportation network for analyzing the alternatives. At the time of the adoption of VISION 2040, the PSRC will be beginning the process of updating the Destination 2030 to bring it into alignment with the VISION. The issue of ferry service will be more fully addressed in the update of Destination 2030.

C-002-007

The DEIS indicated that the Metropolitan Cities Alternative produced favorable results when compared to the other alternatives, although not in all areas. The Preferred Growth Alternative, which shares some of the focused growth patterns of the Metropolitan Cities, was developed following the suggestions and comments of other jurisdictions and the public.



Post Office Box 90012 • Bellevue, Washington • 98009 9012

Mr. Norman Abbott
SEPA Responsible Official
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98194

RE: Comments on Vision 2020 Draft Environmental Impact Statement

Dear Mr. Abbott:

C-003-001 I am writing on behalf of the Bellevue City Council to comment on the Draft Environmental Impact Statement (DEIS) issued for the Vision 2020 Update. We appreciate the work of the Regional Council and the effort it has invested in the development of the DEIS. A strong, well coordinated regional plan helps maintain and enhance the quality of life that we all value. This DEIS provides an important analysis of the options we face for future growth.

On May 15, 2006, Bellevue adopted a set of principles to guide regional planning. These principles (enclosed) are submitted to make them a part of the DEIS record. These principles highlight the need for regionally coordinated approaches to infrastructure, a strategy that rewards communities that take actions consistent with the regional vision, and building off of the solid planning work that has occurred since the adoption of the Growth Management Act, including the adopted regional centers approach to growth management. Bellevue representatives on the regional policy boards will use these principles to guide their involvement in the development of the Vision update. Additionally, please consider a technical memorandum from Bellevue Planning and Community Development Department (enclosed) commenting on the DEIS.

Thank you for the opportunity to comment on the Vision 2020 Update DEIS. If you have any questions or need additional information, please feel free to contact Paul Inghram, on our staff at (425) 452-4070. The City looks forward to continued involvement with the update of Vision 2020, both through our representation on the PSRC policy boards and through continued involvement by our staff and other community stakeholders.

Sincerely,

Grant Degginger
Mayor

cc: Bellevue City Council
Steve Sarkozy, City Manager
Matthew Terry, Planning & Community Development Director
Goran Sparman, Transportation Director

Enclosures:

1. Bellevue Interests Statement Approved May 15, 2006
2. Planning and Community Development Technical Memorandum dated July 31, 2006

C-003-001
Thank you.

**CITY OF BELLEVUE INTEREST STATEMENT:
VISION 2020+20 GROWTH ALTERNATIVES**

Approved May 15, 2006

Background

The Puget Sound Regional Council (PSRC) is responsible for developing and maintaining a regional growth management, economic, and transportation strategy and a regional transportation plan. In 2004, PSRC launched an effort to update its Vision 2020 economic, transportation, and growth management plan to the year 2040. PSRC expects to have an updated plan for consideration by a special General Assembly in the fall of 2007 or early in 2008.

In the past, the policies included in Vision 2020 have provided a general framework for regional growth. PSRC staff are encouraging a more detailed plan than the original Vision 2020 by evaluating models that allocate growth to different geographies. The geographies under study include:

- Metropolitan Cities (Bellevue, Seattle, Tacoma, Bremerton, Everett) – The region's largest core cities containing designated Regional Growth Centers, which serve a key framework for the region's adopted long-range multimodal transportation system.
- Core Suburban Cities – The region's core suburban cities containing designated Regional Growth Centers. Regional Growth Centers serve as a key framework for the region's adopted long-range multimodal transportation system.
- Large Suburban Cities – The region's larger inner-ring suburban cities with combined population and employment over 22,500. Many of these cities contain important local and regional transit stations, ferry terminals, park and ride facilities, and other transportation connections.
- Smaller Suburban Cities – The region's smaller cities and towns. These jurisdictions represent a wide variety of communities, from historic towns and growing new suburban cities, bedroom communities with limited retail and commercial activity and growth potential, to freestanding cities and towns separated from the region's contiguous urban growth area.
- Unincorporated Urban Growth Areas – Areas within designated UGAs that are not within the boundaries of incorporated cities and towns.
- Rural Areas – Lands outside of urban growth areas that are not designated as resource areas under the Growth Management Act.
- Resource Areas – Lands designated as resource areas under the GMA.

As a part of the process of updating Vision 2020, PSRC's Growth Management Policy Board (GMPB) approved four future growth alternatives to be analyzed in a Draft Environmental Impact Statement (DEIS). The four alternatives have been developed to meet State Environmental Policy Act (SEPA) requirements of having a "no action," or baseline, alternative, as well as alternatives showing a range of possible growth scenarios so that the differences between them can be compared and contrasted. The four alternatives are:

- A no action alternative, based on existing comprehensive plans and their growth targets, many of which are not currently being met. Metropolitan cities take 25% of new growth.
- A "metropolitan cities" alternative, which would put substantially more growth in the region's largest cities, including Bellevue. Metropolitan cities take 40% of new growth.
- A "larger cities" alternative, which would put more growth in the next tier of large suburban cities, such as Kent, Redmond, and slightly less growth in the "metropolitan cities" than the existing plans alternative. Metropolitan cities take 20% of new growth.
- A "smaller cities" alternative, which would put the most growth in the fringe of the urban area, and be the most dispersed alternative. Bellevue and other "metropolitan cities" would receive substantially less growth under this alternative than under existing plans. Metropolitan cities take 10% of new growth.

It is possible and quite likely that the final scenario chosen by the region for inclusion in the updated plan will be a hybrid of at least two of the above alternatives.

At its October 2005 meeting, the GMPB adopted a set of elements that will be used to help select the preferred growth alternative. They included:

- Economic Prosperity
- Environmental Quality
- Compact Regional Urban Form
- The Objectives of Destination 2030
- Social Justice & Human Potential
- Efficiencies In Provision and Use of Infrastructure, Public Facilities & Services
- Maintaining Rural Character
- Protecting Resource Lands

The purpose of this interest statement is to define a set of principles to guide Council and staff actions related to the development of the Vision 2020+20 Plan.

Planning Principles Approved by Bellevue City Council May 15, 2006

The City of Bellevue supports the following principles to help guide development of the Vision 2020+20 Plan:

- | | |
|------------------|---|
| C-003-002 | <ul style="list-style-type: none"> ▪ The Plan should consider the alternatives' impacts on major regional infrastructure needs. In addition to transportation, this includes regional water supply and regional wastewater requirements. |
| C-003-003 | <ul style="list-style-type: none"> ▪ The Plan should recognize that land use decision-making is largely a function of local jurisdictions. In this light, the Vision 2020+20 Plan should be clear about how it fits within the structure of state, multi-county, county-wide, and local planning responsibilities. |

C-003-002

Thank you for your comment. The FEIS considers impacts to regional infrastructure for the alternatives, and the VISION and the multicounty planning policies both specifically note regional infrastructure needs including water supply and wastewater.

C-003-003

VISION 2040 respects local control. As a membership organization, the members govern the Regional Council. VISION 2040 provides regional agreement and guidance that helps local governments achieve objectives that they cannot accomplish working alone (such as the designation of Regional Growth Centers).

C-003-004	<ul style="list-style-type: none"> ▪ The Plan should include an implementation strategy that rewards jurisdictions that "do the right thing;" i.e., that take action consistent with the regional vision and succeed in accommodating a significant share of growth.
C-003-005	<ul style="list-style-type: none"> ▪ The Plan should reinforce the adopted multi-tiered centers approach to growth management and transportation prioritization. In this light, it should strengthen the regional centers criteria to reinforce the credibility and power of the centers concept. ▪ The Plan should build upon regional and local planning decisions made to date, recognizing the solid planning and implementation work that has occurred in the 16 years since GMA was adopted. ▪ The Plan should work to improve the balance between the location of jobs and housing, recognizing the strong impacts this has on housing affordability and transportation patterns.
C-003-006	<ul style="list-style-type: none"> ▪ The analysis leading to a preferred alternative should fully examine the policy implications and trade-offs of the various draft alternatives, including their environmental, fiscal, transportation, and other dimensions.
C-003-007	<ul style="list-style-type: none"> ▪ The Plan may be ambitious, but it must also be realistic given reasonable market realities and constraints. ▪ The Plan should establish a vision that maintains the region's outstanding natural heritage and economic vitality, by setting a "high bar" for planning across the region.

C-003-004

VISION 2040 contains policies that are designed to help jurisdictions accommodate growth. For example, see the "fiscal policies" in the General Policies section.

C-003-005

VISION 2040 and the multicounty planning policies reinforce these regional commitments, and continue to support centers and promote a closer balance between jobs and housing in the policies.

C-003-006

The Draft, Supplemental Draft, and Final Environmental Impact Statements, as well as their technical appendices and public outreach activities, contain the types of analysis suggested in the comment.

C-003-007

PSRC believes the Preferred Growth Alternative and the accompanying VISION document and the MPPs represent an ambitious and achievable plan for the region. The VISION's components strengthen regional planning commitments for preserving our environment. Moving beyond 2020, VISION 2040 now contains an environmental framework and stand-alone section of environmental policies.



MEMORANDUM

DATE: July 31, 2006

TO: Norman Abbott
SEPA Responsible Official
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98194

FROM: Matthew Terry, Planning & Community Development Director

CC: Bellevue City Council
Steve Sarkozy, City Manager
Goran Sparrman, Transportation Director

SUBJECT: **Comments on VISION 2020 Update Draft Environmental Impact Statement (DEIS)**

C-003-008 I am writing on behalf of the City of Bellevue to comment on the Draft Environmental Impact Statement (DEIS) issued for the VISION 2020 Update project. We appreciate the significant undertaking this project is for the Regional Council. The DEIS, while a large document commensurate with the scope of the regional plan, is easy to follow and understand. Complex topics are explained thoroughly while remaining accessible.

The DEIS is, for the most part, clearly organized. We like how the Regional Council chose to include a chapter on the Regional Environmental Baseline near the beginning of the document. This helps to establish a baseline that can be used for comparison as monitoring occurs over time. It also provides the reader of the DEIS with a grounding of our current conditions. The analyses of potential impacts that follow make more sense by providing this baseline chapter up front.

The Regional Council has done a commendable job including agencies and the public in the VISION 2020 update process. In addition to the formal 60-day comment period provided for the DEIS, we appreciate how PSRC held a public event to distribute the DEIS, has visited a number of jurisdictions, including Bellevue, and has worked continuously with the policy boards and staff representatives.

We would like to offer the following comments on the DEIS for your consideration.

C-003-009 1. **Alternatives Review Process.** The issuance of the DEIS by PSRC creates ambiguity about the process to select a regional growth alternative. Environmental review documents, while an important part of an alternatives selection process, are often technical documents that are a supplemental to other project documents. In

C-003-008

Thank you for your positive comments about the VISION process and the Draft EIS.

C-003-009

Comment noted. PSRC has clarified the public process, environmental review, and the vision elements of the project. Since the release of the DEIS, the VISION 2040 document has become the primary focus.

- C-003-009** | the case of the VISION 2020 Update, the DEIS is presented as the primary document, and yet, because of its technical style, may serve to hide the alternatives from public review. For example, the headline on the PSRC webpage states: "Draft Environmental Impact Statement for VISION 2020 Update: Available for Public Review" which makes it sound as though the current activity is review of a SEPA document. We encourage PSRC to more directly engage the public in the questions: "How should we grow?" and "Where should we grow?" It should also be clear whether and how the public can be involved in the process after the official 60-day comment period has ended, including the process to develop the draft VISION.
- C-003-010** | 2. **Comparison to Existing VISION 2020.** The existing VISION 2020 expresses a regionally agreed upon plan for directing growth toward centers. While the Growth Targets Extended alternative is based on existing local plans (presumably consistent with the regional vision), it is unclear whether that alternative is intended to represent an extension of VISION 2020 or if VISION 2020 is not included as an alternative for review. If the former, the documentation should more plainly explain the role of the Growth Targets Extended alternative and how it represents VISION 2020. If the latter, the documentation should discuss how each of the alternatives compares to the centers approach of the current VISION.
- C-003-011** | 3. **Highlight Trade Offs.** The DEIS lacks adequate discussion of the differences between types of compact growth distribution. Four geographic distribution alternatives are presented in the DEIS to analyze where growth could occur, yet much of the analytical discussion appears to be simply explain how more compact development results in generally fewer impacts compared with sprawl. For example, little difference is shown between Larger Cities and the Metropolitan Cities alternatives, both which emphasize compact development. Is this to demonstrate that any distribution of compact development reduces impacts, or are there differences between these alternatives that could be further explored?
4. **Explain the Cause of Differences.** It is unclear whether the generally greater impacts shown for Growth Targets Extended and Smaller Cities (compared to the other two alternatives) are due to their pattern of geographic distribution or, more specifically, the allocation of more growth to unincorporated and rural areas. What if the Growth Targets Extended alternative was modified to include less unincorporated and rural growth? Would its growth pattern for urban areas compare well against the other alternatives? The aspect of the growth pattern that results in increased impacts should be identified, to the extent feasible, so that it is clear whether the broader distribution pattern or a specific aspect of it, such as rural development is the cause.
- C-003-012** | 5. **Land Use Analysis Unclear.** The proposed land use criteria address transit, parks and environmental health. All of these appear to be redundant with transportation and health criteria. The Land Use chapter relies on the INDEX model of growth distribution of each alternative to express land use differences, even though the DEIS notes that INDEX is a "conceptual illustration of future density" and the

C-003-010

As noted in your comment, the Growth Targets Extended Alternative does represent an extension of VISION 2020, as implemented through local plans, to the year 2040. VISION 2040 is meant to support and build from existing comprehensive plans, countywide policies, the state Growth Management Act, and the existing VISION. At the same time, VISION 2040 is meant to show leadership, and build on existing processes and plans rather than maintaining the status quo. Based on public comment, VISION 2040 focuses on new issues, establishes new areas of regional agreement, and establishes actions and measures.

C-003-011

The EIS process contains a significant amount of analysis that describes the impacts of the different growth distribution alternatives, analyzing all of the elements of the environment under SEPA. However, 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.

C-003-012

The analysis of land use, which is found in Chapter 5.2 and discussed in many chapters, such as 5.12, describes potential differences under the different alternatives. All of the alternatives are "painted" from the base of existing land use designations. For the most part, accommodating growth was feasible in most geographies with limited or no changes to land use designations. For more information on painting alternatives, see FEIS Appendix I-D.

- C-003-012** alternatives are defined by general geographic distribution, not development patterns. From review of the DEIS, it appears that there are no clear regional land use differences between the alternatives. Recognizing that most land use factors are dependent on local plans and codes, the DEIS should be more clear as to how the regional plan could effect land use at the regional scale. Are there regional land use differences between the alternatives that can be made without making assumptions at the INDEX grid-cell level?
- C-003-013** 6. **Include Fiscal and Economic Impacts in Analysis.** While the DEIS analysis covers public services, it does not directly address economic or fiscal impacts. How the alternatives could impact the fiscal health of local jurisdictions could be a key deciding factor. The DEIS should more clearly explain how the alternatives, and their related need for infrastructure and services, may impact government fiscal health. While an issue paper on economics is included in the appendix, it is unclear how the issue paper is included in the DEIS analysis. How the alternatives support or impact our economic strategy should be addressed, if there are key differences between the alternatives.
- C-003-014** 7. **Reality Checks.** Alternatives should be reviewed against reality checks and known constraints. For example, the region has developed extensive data regarding buildable and redevelopable lands. How well is each growth distribution alternative accommodated by current levels of buildable and redevelopable land (recognizing that areas of future redevelopment cannot be accurately predicted)? The alternatives could also be compared with statistical trends. The feasibility of an alternative may determine whether an alternative could be successfully implemented.
- C-003-015** 8. **Variability Should be Addressed.** The DEIS states that there is variability regarding how the alternatives could be implemented [page ES.8]. Presumably, growth could be distributed in a variety of forms within the defined geographic boundaries of each alternative. However, the DEIS also discusses how the computer models assume a specific development pattern for each alternative and provides detailed results. For example, Figure 5-3-4 shows that average trip distance for work trips under the Larger Cities alternative will be 12.0 miles. To what degree could variability in vision implementation affect the outcome of the analysis? Is it possible that the outcome could vary considerably depending on the implementation of the alternative? Do some tradeoffs remain regardless of the implementation variability; do other become muted by it?
- C-003-016** 9. **Improve Evaluation Process.** Appendix C lists four goals identified by the Growth Management Policy Board:
- Promote an overall high quality of life.
 - Create an efficient land use pattern for provision of infrastructure, facilities, and services.
 - Protect the natural environment.
 - Enhance human potential and social justice.

C-003-013

As was done in VISION 2020, fiscal analysis was completed at a scale and level of detail appropriate for this regional visioning process, including the Public Services chapter, Cost of Sprawl Issue Paper, etc. Also, a Fiscal Impact sidebar was added to VISION 2040. Note that economic impacts analysis is not required under SEPA, and, given the scale, is better accomplished in subsequent local planning.

C-003-014

The alternatives are conceptual in nature and are designed to support environmental analysis on a range of growth management approaches that the region may take. The Preferred Growth Alternative was developed as a hybrid of the initial four alternatives studied in the Draft Environmental Impact Statement, and is defined in a manner that is meant to be both an ambitious and achievable approach for managing the region's future growth. Also, PSRC convened a group of local staff to conduct this type of analysis during the process to develop the Preferred Growth Alternative.

C-003-015

PSRC has added a statement to the Final EIS stating that the analysis and its results do involve some level of uncertainty because of the factors you have mentioned, including differences in implementation, localized assignments of growth, and the use of computer models to forecast future growth. However, PSRC also believes these tools allow a reasonable comparison of alternatives because the same sets of assumptions and models have been used for all.

C-003-016

Note that while differences exist between the criteria and FEIS chapters, many criteria do include an overall judgement of the FEIS chapters. Also, in response to comments from the public as well as by PSRC's members

C-003-016

Appendix C also provides evaluation criteria that are intended to represent the four goals. The evaluation criteria are not aligned with the chapters of the DEIS and many of the criteria rely on "overall judgment" based on issue papers that are listed in Appendix E. The lack of continuity between the criteria and the DEIS makes evaluation of the alternatives difficult. The documentation should make it clear how the DEIS alternatives will be evaluated and how the DEIS analysis is part of that evaluation. Ideally, the DEIS chapters and the evaluation criteria should align with each other and the goals. A summary of the analysis, including a completed version of the criteria table, should be included in the documentation. A summary of criteria would be helpful at the end of each analysis chapter in the DEIS.

C-003-017

From our discussions with PSRC staff, it is our understanding that many of the concerns expressed above will be addressed as PSRC develops the draft VISION update, including draft policy updates, and when a Supplemental DEIS is prepared for the preferred growth alternative. It will be important, when a preferred alternative is presented to the public, for appropriate and comprehensive analysis to accompany it that clearly explains the tradeoffs between the preferred alternative and other options.

Thank you for the opportunity to comment on the VISION 2020 DEIS. If you have any questions or need additional information, please feel free to contact Paul Inghram, on our staff at (425) 452-4070. The City looks forward to continued involvement with the update of VISION 2020, both through our representation on the PSRC policy boards and through continued involvement by our staff and other community stakeholders.

and the Growth Management Policy Board, PSRC refined the criteria used to evaluate the alternatives. The criteria became an important element of the public steps to develop and refine the PGA. See FEIS Appendix I-C for more information.

C-003-017

Comment noted.

City of Bothell

July 31, 2006

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

Re: Vision 2020 Update Draft Environmental Impact Statement

Dear Mr. Abbott:

On behalf of the Bothell City Council, thank you for the opportunity to respond to the Vision 2020 Update Draft Environmental Impact Statement (DEIS). The City of Bothell offers comments on the DEIS via two documents. One is a letter which is expected to be sent to you by the Suburban Cities Association in September, articulating the common concerns of many cities, including Bothell. The other document is this letter, which provides Bothell's particular perspective.

We recognize that the four alternatives defined in the DEIS necessarily were structured so that there would be meaningful and measurable differences among them, for analysis and comparison purposes. We suspect that the final Preferred Growth Alternative will be a hybrid of components of the four. However, since no such hybrids have yet been identified, our comments relate to how Bothell would be affected by the four DEIS alternatives, "straw men" though they may be.

Bothell growth targets under the four DEIS alternatives

In the DEIS, Bothell is categorized as a Core Suburban City, by virtue of containing a designated Regional Growth Center at Canyon Park.

Core Suburban Cities would be asked to accommodate the most population growth under the Larger Cities Alternative (30 percent of regional growth), followed by the Metropolitan Cities Alternative (25 percent), the Growth Targets Extended Alternative (17 percent), and the Smaller Cities Alternative (10 percent).

With respect to employment, Core Suburban Cities would be asked to accommodate the most employment under the Metropolitan Cities and Larger Cities alternatives (30 percent of regional growth in each), followed by the Growth Targets Extended Alternative (28 percent) and the Smaller Cities Alternative (10 percent).

How would Bothell be affected under each of these alternatives? We could find no Bothell-specific projections in the DEIS or its appendices. However, PSRC's June, 2006,

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C-004-001

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C-004-001

The Final EIS includes revisions and clarifications to the alternatives and the planning process, largely in response to public comments on the Draft EIS and Board direction. This includes changing the level of definition for all alternatives to be at a regional geography by county level of detail, rather than by individual jurisdiction.

VISION 2040 regional geographies are defined only by population and employment thresholds. Local differences will be considered by the localities as they work together to establish targets in the countywide process. This approach incorporates local perspectives and choices while providing a unifying regional message. Regional geographies in the regional growth strategy help VISION 2040 to be more specific, measurable, and clear. While the regional geography numbers are important, the percentage will be used more often. Beyond the regional geographies, the regional growth strategy continues to retain a centers-based focus.

- C-004-001** Regional View included projected population and employment under the four alternatives for Lynnwood, another Core Suburban City. If the same percentage increases were applied to Bothell as were applied to Lynnwood, the numbers would be as follows:

Alternative	Bothell Population	Bothell Employment
Year 2000 actual	30,150	20,456
Growth Targets Extended	40,100	31,298
Metro Cities	49,748	33,752
Larger Cities	53,667	33,752
Smaller Cities	37,989	24,956

- C-004-002** Bothell's actions to accommodate 2025 growth targets

Along with other cities and the counties in the region, Bothell has updated its comprehensive plan and development regulations to accommodate population and employment growth targets for the year 2025. 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 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.

These changes were not made hastily or in a cavalier manner. Great care was taken to ensure that in the intensification of land use to accommodate future growth, valued community attributes would not be lost. Thus, for three examples, maximum allowed building heights were scaled to the particular physical setting (taller within the broad North Creek Valley, shorter within the intimate confines of Downtown); upper stories of new buildings along the City's historic Main Street were required to be stepped back; and special setbacks were instituted around the perimeter of activity centers to protect surrounding residential neighborhoods.

The cumulative effect of these actions has been to meet Bothell's 2025 targets, with a moderate surplus in population capacity and a sizable surplus in employment capacity to accommodate growth post-2025, as shown below:

Actual / target / capacity	Population	Employment
Year 2000 actual	30,150	20,456
2025 targets	42,836	28,673
Capacities	44,918 - 45,836*	67,580

* Expressed as range to reflect Scenarios A and B from Snohomish County Buildable Lands Report

Bothell's population and employment capacities v. DEIS growth targets

- C-004-003** Comparing Bothell's capacity figures to the growth the City would be expected to accommodate under the four Vision 2020 Update alternatives reveals the following:

- Bothell has adequate capacity to accommodate population growth under the Growth Targets Extended and Smaller Cities alternatives.

C-004-002

Thank you for providing background on Bothell's planning and code changes to accommodate growth.

C-004-003

Your observations have been noted. As noted above, the alternatives have been refined to no longer include specific assignments by municipality.

- C-004-003**
- Bothell has insufficient capacity to accommodate population growth under the Metro Cities and Larger Cities alternatives.
 - Bothell has ample capacity to accommodate employment growth under any of the four scenarios.

Observations and concerns

Based on the above analysis, we have the following observations and concerns:

- C-004-004**
- Accommodation of population beyond current capacity. As noted above, Bothell's actions to accommodate our 2025 population and employment targets 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.

Those actions resulted in a moderate surplus in population capacity over the 2025 targets and a sizable surplus in employment capacity. However, the surplus in population capacity would be insufficient to accommodate population growth under the Metro Cities and Larger Cities alternatives in the Vision 2020 Update DEIS.

We are concerned that the substantial increases in population capacity which would be necessary to accommodate growth under these two alternatives 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 attributes by which a community defines itself.

- C-004-005**
- Expansion of urban growth area boundaries. Expanding on the above point, we suspect many cities will share Bothell's concern that accommodation of substantial increases in population and/or employment will result in an irrevocable loss of, or undesirable changes to, community character.

Resistance from enough jurisdictions may prevent accommodation of projected growth within existing urban growth area boundaries.

Accordingly, we believe that expansion of urban growth area boundaries should be given due consideration and discussed as a serious option in the DEIS. We are not saying we support such an action, but we feel that the range of alternatives is not truly representative of all growth management choices unless expansion is analyzed.

- C-004-006**
- County assignment of growth to cities' potential annexation areas. We cannot determine from the DEIS how much population and employment would be assigned to Bothell's potential annexation areas under the four alternatives. Historically, however, King and Snohomish counties have designated these areas for higher residential densities than within Bothell itself.

Aside from creating a land use pattern which is counter to the intuitive notion of diminishing intensities as distance from activity centers increases, this practice results in

C-004-004

Comment noted.

C-004-005

The idea of expanding the urban growth area in the analysis of alternatives was considered during the VISION update process and was not accepted. Rather, the analysis was based on existing densities and development patterns within the region's urban growth areas, future planned densities derived from locally adopted comprehensive plans and Countywide Planning Policies, and densities necessary to absorb regional growth through the year 2040.

C-004-006

Growth is not assigned to unincorporated urban areas at the potential annexation area level. The Regional Growth Strategy does, however, state a preference for growth in the unincorporated urban areas to be in areas affiliated for annexation rather than those unaffiliated, in order to promote the affiliation of all of these areas with cities for annexation. Additional detail regarding the Regional Growth Strategy's figures, particularly in the tables "Snohomish Employment" and "Snohomish Population," can be found in the FEIS appendices, in Appendix I-A.

C-004-006 strains on infrastructure and services within Bothell itself, and in maintenance and other service delivery issues when those areas annex.

We request that the DEIS recognize the cities' interest in these unincorporated areas, and, further, include discussion of possible approaches towards meaningful financial incentives for cities to annex these areas.

C-004-007 Adequate funding for infrastructure. One of the glaring failures of growth management has been 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.

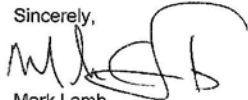
Under any of the alternatives, funding mechanisms must be identified and in place to ensure that capital facilities are built and operational when they are needed, or at least in a shorter time span than the six years the Growth Management Act allows for construction of transportation facilities. We 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.

Directing growth towards areas with major infrastructure investments. 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 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.

C-004-008 PSRC voting structure. At some point in the future, the PSRC membership will select a preferred growth alternative. We have long been concerned about what we perceive to be inherent preferences built into the PSRC voting structure, and recommend that the current methodology be re-examined prior to any vote on a preferred growth alternative to ensure more equitable representation by mid-size and smaller cities than now exists.

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

C-004-007

VISION 2040 calls for prioritizing funding to centers, and contains policies and goals to this effect. Also, VISION 2040 actions call for collaborative work at the regional level to seek to create additional resources for infrastructure. Regarding transportation infrastructure, the region's metropolitan transportation plan, Destination 2030, is now being updated to align it with VISION 2040 and its Regional Growth Strategy.

C-004-008

The PSRC's voting structure and methods are set out in the agency's Interlocal Agreement and are based on a proportionate representation structure. All of the steps to develop and adopt a PGA have provided the opportunity for comments and discussion by all members and the public. This has allowed for a collaborative process, with formal voting being the final measure of approval for the VISION 2040 at PSRC's General Assembly, which includes all of the region's elected officials.



July 28, 2006

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 VISION 2020 Update Draft Environmental Impact Statement

Dear Dr. Abbott:

The City of Des Moines is pleased to have an opportunity to comment on the VISION 2020 Update Draft Environmental Impact Statement (Draft EIS). Our comments are based on our review of the Draft EIS as well as information presented by PSRC staff to the Des Moines City Council on July 8, 2006. City of Des Moines comments represent the position of the entire City Council.

C-005-001

The City of Des Moines does not support any of the growth alternatives as presented nor do we agree with the grouping of Des Moines into the Larger Suburban Cities geographic sector. In summary, we are very much concerned that any preferred 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. Any of the growth alternatives if extended to Des Moines would have just this negative effect. This requires, in our judgment, a preferred alternative that allows 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.

C-005-002

No minimum densities, such as the often mentioned 4 dwelling units per acre, should be required. 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.

C-005-003

The carrying capacity of the 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.

The Waterland City
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C-005-001

The Final EIS includes revisions and clarifications to the alternatives and the planning process, largely in response to public comments on the Draft EIS and Board direction. This includes changing the level of definition for all alternatives to be at a regional geography level, rather than by individual jurisdiction. As a practical matter, even cities that are largely developed are likely to have opportunities for redevelopment within their boundaries.

VISION 2040 regional geographies are defined only by population and employment thresholds. Local differences will be considered by the localities as they work together to establish targets in the countywide process. This approach incorporates local perspectives and choices while providing a unifying regional message. Regional geographies in the Regional Growth Strategy help VISION 2040 to be more specific, measurable, and clear. While the regional geography numbers are important, the percentage will be used more often. Beyond the regional geographies, the Regional Growth Strategy continues to retain a centers-based focus.

C-005-002

VISION 2040 does not include a minimum density requirement. Also, VISION 2040 respects local control. As a membership organization, the members govern the Regional Council. VISION 2040 provides regional agreement and guidance that helps local governments achieve objectives that they cannot accomplish working alone (such as the designation of Regional Growth Centers).

C-005-003

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

C-005-004

PSRC's Resolution A-96-02 amended the 1995 Metropolitan Transportation Plan to include the third runway at Seattle-Tacoma International Airport. Section III.I of the Resolutions' Appendix G, states that PSRC shall "Recommend that the State, in cooperation with appropriate local jurisdictions and regional transportation planning organizations, implement a comprehensive process for evaluating all options to meet the State of Washington's long-term air travel and inter-regional ground transportation needs, including high speed rail." Des Moines is please to see that PSRC made this recommendation in late 2004, the Legislature passed and the Governor sign ESSB 5121 that lays out a three phase effort to study long-range air transportation capacity and PSRC plans to be active in this effort. It is our expectation that PSRC will work diligently to make sure that an honest assessment is made of the efficacy of a second regional airport and that the entire region's needs will be studied, taking into account the growth projections included in the update to Vision 2020,

Our more specific comments are organized into the following topic areas:

- Local Policy Framework and Context for Des Moines
- Preferred Growth Alternative
- Multicounty Planning Policies

C-005-005

Local Policy Framework and Context for Des Moines

The City of Des Moines recognizes the need for coordinated planning to address future growth. The City of Des Moines Comprehensive Plan Policies 1-03-01 through 1-03-09 and Strategy 1-04-04 reflect the City's vision for its future and the need for coordinated planning to:

- Manage community growth so that overall public benefits exceed public cost.
- Utilize the Comprehensive Plan as the policy basis for making decisions affecting the growth and development of Des Moines.
- Plan for and regulate development to enhance the quality and maintain the unique character of Des Moines' neighborhoods and business districts.
- Coordinate the planning for Des Moines with state, regional, county-wide and neighboring jurisdiction planning activities.
- Participate in planning activities affecting Des Moines undertaken by state agencies, King County, regional agencies, tribes, and special purpose districts. Seek to influence the decisions of those agencies to be consistent with the City of Des Moines Comprehensive Plan.
- Protect and preserve environmental features, and air and water quality.
- Provide for urban densities in areas where adequate public facilities and services are in place or will be in place concurrent with development approval.
- Provide for economic development that meets regional employment needs and a local balance of jobs and housing.

During the past two and a half decades, the rate of population growth in Des Moines has varied from an average annual decrease of 0.1 percent (2000-2005) to increases of 6.93 percent (1990-

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.

C-005-004

Comments noted. PSRC is participating on an airport capacity study, although this is not part of the VISION update process.

C-005-005

Thank you for providing additional background on the city's growth patterns and on its policies.

C-005-005 2000) and 13.4 percent (1980-1990) respectively. The majority of the City's growth during the 1980's and 1990's was the result of annexations to the City.

The 20-year (2002-2022) adopted growth target for Des Moines is 1,576 households. Assuming an average household size of 2.47 (2000 census) this equates to approximately 3,893 people. This represents an increase of 13.2 percent over the 20-year period or an average annual growth rate of 0.66 percent. The 2002 buildable lands analysis for Des Moines determined that the City has the capacity to accommodate an additional 437 housing units (1,079 people) beyond its 20-year adopted growth target.

C-005-006 **Growth Alternatives**

As previously stated, the City of Des Moines does not support any of the growth alternatives as proposed. The Preferred Growth Alternative should be a hybrid of alternatives that:

- Concentrates growth in a focused growth pattern in the major metropolitan cities and core suburban cities currently designated as Regional Growth Centers because of the lower environmental impacts.
- Directs future population and job growth first to areas with current or planned capacity and infrastructure to serve that growth.
- Improves the balance between housing and job locations.
- Is developed in coordination with the region's economic development strategy.
- Is consistent with current comprehensive plans of cities, including the local vision for growth during the 20-year planning period.
- Avoids a "one size fits all" or "bright line" approach.
- Is consistent with the long-term financial stability of cities, in particular, the need for cities to attract business to maintain and grow their tax base to support additional infrastructure investments.
- Promotes creating quality communities, environmentally sustainable development, design standards, and market-based techniques for preservation of land with public benefits.
- Recognizes that the arterial systems in large suburban cities will be affected by commuters traveling to major metropolitan and core suburban cities and regional transportation facilities.

C-005-007 **Multi-county Planning Policies**

Multi-county Planning Policies (MPPs) should 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 housing without imposing a uniform minimum urban residential density, and provide financial support for transportation infrastructure throughout the region.

- Regional transportation funding must support the adopted regional growth pattern, in particular to support the ability of cities where population and jobs are focused to accommodate that growth, but large suburban cities such as Des Moines will also see

C-005-006

Thank you for your comment regarding your preference for a hybrid alternative. PSRC considered this and other comments in developing the definition of the Preferred Growth Alternative, and the PGA is consistent with many of the points raised in your comment.

C-005-007

Comments regarding maps are noted. The Preferred Growth Alternative builds upon local plans. Implementation of the PGA will be accomplished through local plans, which provides the opportunity to ensure that the regional VISION is implemented in a manner responsive to local situations.

Further, VISION 2040 calls for prioritizing growth in centers, and contains policies and goals to this effect. Also, VISION 2040 actions call for collaborative work at the regional level to seek to create additional resources for infrastructure.

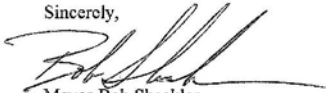
C-005-007

growth and will be expected to support commuters, and therefore should get a share of regional transportation dollars.

- 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 viable and quality communities with vibrant 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 2020 +20 Update 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



CITY OF EDMONDS

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OFFICE OF THE MAYOR

GARY HAAKENSEN
MAYOR

C-007-001
Thank you.

July 26, 2006

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

Re: City of Edmonds Comments on Vision2020+20 DEIS

Dear Dr. Abbott:

We appreciate and support the efforts of the Puget Sound Regional Council in helping lead the effort to update the regional Vision2020+20 plan. This is a very important process, and we are hopeful that the result will help shape a positive future for the entire region.

The Draft Environmental Impact Statement (DEIS) contains much information and discussion that will surely prove valuable as the region moves toward developing a preferred growth alternative that can be implemented by all jurisdictions in Puget Sound. We would like to compliment PSRC and the DEIS preparers on the breadth of the issues addressed and the thoughtfulness with which the analysis is carried out.

In reviewing and discussing the four growth alternatives presented in the DEIS, the City of Edmonds would like to offer the following comments and suggestions.

General Comments

There is much beneficial discussion of growth issues in the DEIS. We believe the discussion and analysis in the DEIS point to a number of goals and values we would like to see reflected in the regional plan update, including:

• Incorporated August 11, 1890 •
Sister City - Hekinan, Japan

C-007-001

C-007-002

- Preserve and restore Puget Sound.
- Support a regional "landscape" that provides connected open spaces and differentiated urban areas that each have a special "character" all their own.
- Provide for the responsible stewardship of natural resource and agricultural lands.
- Protect environmentally critical areas, including valuable wetlands, watersheds, and wildlife habitat areas.
- Promote the use of urban design to make sure cities, towns, and urban areas are livable and provide a range of choices and lifestyles. Choice in housing and access to jobs is critical to success at both the local and regional level.
- Promote the use of historic preservation to protect the unique character found in our historic communities.
- Provide a framework to support a sustainable and balanced economy, enabling jurisdictions to reliably plan for and finance both regional and local infrastructure and services. A high-quality educational system is a critical component of this effort.

C-007-003

The use of "regional geographies" in developing the DEIS appears to be an innovative way of explaining the alternatives and aggregating impacts to highlight the choices we must all make. So long as a preferred alternative is developed which borrows the best aspects of the various alternatives discussed in the DEIS and is designed so that implementation is actually achievable, then this should result in a positive regional approach.

However, we are concerned that the use of the current regional geographies described in the DEIS also masks some of the differences among jurisdictions. Take the example of "larger suburban cities" in Snohomish County, which is the grouping that Edmonds is included in for analysis purposes. Although sharing some similar characteristics, there are very significant differences among the cities in this grouping - including such things as level of existing development, presence of critical areas or natural features, maturity of services and infrastructure, and overall capacity to grow.

In order for regional geographies to be a meaningful tool in a future vision for the region, the preferred alternative will have to somehow account for the differences as well as the similarities among the jurisdictions included in the same "geography." This will have to be done not only during the analysis and building of the preferred alternative, but also when the implementation system and governance questions are being answered (e.g. during the development of multi county policies).

C-007-002

Thank you for providing the City's statements regarding policy elements it supports as part of the PGA and VISION 2040. VISION 2040's Regional Growth Strategy and multicounty planning policies address many of the issues noted in your comment.

C-007-003

VISION 2040 regional geographies are defined only by population and employment thresholds. Local differences will be considered by the localities as they work together to establish targets in the countywide process. This approach incorporates local perspectives and choices while providing a unifying regional message. Regional geographies in the Regional Growth Strategy help VISION 2040 to be more specific, measurable, and clear. While the regional geography numbers are important, the percentage will be used more often. Beyond the regional geographies, the Regional Growth Strategy continues to retain a centers-based focus.

C-007-004

A second concern regarding the geographies is what we understand to be a possible implementation system. As we understand it, the regional geographies and future growth monitoring could be developed in such a way that implementation decisions are distributed and decided at a county-specific level. This is appropriate, since population targets under GMA are assigned at the county level. However, a concern is that if a region-wide scheme for distributing future growth is developed based on the regional geographies, this could create practical problems when the regional geographies are then split up according to which county they fall in. In other words, while the regional geographies account for certain percentages of regional growth, they may not match up with GMA-mandated (i.e. OFM-generated) county-wide growth targets at the county level. That could lead to an awkward situation when GMA required planning attempts to reconcile OFM-assigned growth targets with the Vision2020+20 growth plan. As an example, suppose that the geographies intended to absorb regional growth are under-represented or disproportionately constrained in Snohomish County relative to the OFM targets that the county must plan for. This could lead to a skewing of the regional plan unless either (1) the regional plan acknowledges and considers potential differences in how the geographies operate within different counties or (2) the plan provides flexibility and a way of working through the practical consequences.

C-007-005

Another concern is a philosophical one. One of the hallmarks of GMA is in celebrating diversity. Every community is different and has developed in different ways, with differing challenges in terms of environmental constraints, age and distribution of infrastructure, and capacity for growth. We trust that this diversity will be recognized and built into the analysis and development of a preferred alternative, and that these differences will also inform how the preferred alternative is implemented both locally and across the region. We would like to see a preferred alternative that is designed to achieve a coherent and positive regional vision, but one that is based on a realistic assessment of opportunities, capacities and constraints.

C-007-006

Comments Specific to Edmonds

The City of Edmonds adopted a GMA-compliant comprehensive plan update in 2005. This plan has also been certified by PSRC. Part of the analysis in the updated plan concerned population and employment capacity within the city, since this was necessary to confirm that the city could absorb the projected growth anticipated through the year 2025. The relevance of this information for the Vision2020+20 update is very important to consider as we move toward a preferred alternative.

C-007-004

Cities were grouped into their respective regional geographies based on year 2000 population numbers from U.S. Census, and PSRC employment numbers from estimates derived from the Washington State Department of Employment Security. PSRC recognizes that as cities continue to grow, both through net increase and through annexation of unincorporated areas, their population and employment levels may change significantly. To correct for these changes, PSRC anticipates a technical amendment to the Regional Growth Strategy to potentially reclassify cities before the region's counties undertake the next round of Growth Management Act target-setting work. This is anticipated to occur in 2011 or earlier.

C-007-005

PSRC recognizes the importance of local decisionmaking, which in turn recognizes diversity. The VISION 2040 project is intended to support these established planning processes by providing a common regional framework with related goals and policies, and supporting subsequent local planning to implement the VISION in a manner that recognizes local circumstances.

C-007-006

Thank you for providing additional information on the City of Edmond's planning efforts.

- C-007-006** Briefly, the city's analysis in its 2005 comprehensive plan update showed that:
- The November 2002 Buildable Lands Report for Snohomish County estimated the city's population capacity to be 45,337. The city's employment capacity was set at 12,041.
 - The city's planned population target for 2025 is 44,880, which would reach 99% of current capacity.
 - Net residential density throughout the city was 4.9 dwelling units per acre in 1990. This had increased to 5.4 per acre in 2000, and is projected to reach 6.3 dwelling units per acre by 2025. This density is distributed across a mix of designated urban and resource lands.
 - The distribution of density is not uniform in Edmonds. Far from it. Approximately two-thirds of Edmonds' single family land area is designated "urban" in the city's comprehensive plan, but the remaining one-third of single family-designated areas are single family "resource" lands that have significant environmental constraints such as wetlands, streams, and slide areas. Because of these constraints, densities in these "resource" areas cannot be increased.
 - To implement the comprehensive plan, the city has completed a number of actions designed to increase density and improve housing affordability. Over the last ten years these actions have ranged from removing density caps in mixed use areas to reducing parking requirements to encouraging the use of PRDs in difficult-to-develop areas (such as those with environmental constraints).

C-007-007 The points listed above illustrate a couple of things. First, as a mature suburban city, Edmonds is heavily constrained in its potential for significant changes in its existing development pattern, and a preferred alternative that proposed a broad, jurisdiction-wide increase in density or intensification of use would simply be unrealistic.

C-007-008 In the case of the "Larger Cities Alternative" described in the DEIS, our review of the data in the appendix indicates a theoretical increase in population of over 140% for Edmonds. This would simply be impossible to achieve, even if the plan ultimately called for this level of development to occur. We understand that the appendix was included for reference only, and that the numbers included there are not intended to be targets for any jurisdiction. However, if that is so, then the preferred alternative will still need to be developed based on realistic local conditions. Otherwise, how can the impacts identified for the preferred

C-007-007

Thank you for providing information on the analysis and findings from the City's process to develop its comprehensive plan. In response to comments such as yours, PSRC revised the level of definition for the growth alternatives so that specific targets for cities would no longer be implied. This adjustment also helped PSRC to develop a Preferred Growth Alternative that was more balanced, realistic and achievable at the local level.

C-007-008

The Final EIS includes revisions and clarifications to the alternatives and the planning process, largely in response to public comments on the Draft EIS and Board direction. This includes changing the level of definition for all alternatives to be at a regional and countywide level of detail, rather than by individual jurisdiction. Clearly, market forces could affect the extent and location of growth over time, but PSRC believes that the broad patterns of growth explored by the alternatives provided illustrations of the more likely patterns that could occur.

- C-007-008** alternative be considered to be true and reasonable if they are not based on realistic numbers?
- C-007-009** Even with the constraints mentioned above, the city *has* been able to plan for and encourage redevelopment or infill to occur in strategic locations. The city continues to strategically plan for growth. As an example, we are currently considering the possibility of further intensification of an existing "activity center" along Highway 99 to become a full-blown regional center. This could be a timely response to a confluence of factors, including planned new transit service (bus rapid transit), changes in zoning, and apparent interest in some key redevelopment opportunities. While developing a preferred alternative we encourage you to look for and acknowledge this type of targeted planning, since these types of considerations could have a significant impact on development of an achievable growth alternative.
- C-007-010** Finally, it will be critical to include – both in the preferred alternative and its related implementation measures – an analysis and proposals for mitigating impacts felt at the local level. In many cases, this will be an economic or fiscal concern. Further intensification within urban areas, even if properly targeted as we suggest, will necessarily result in an additional strain on existing infrastructure. This is a huge issue for cities such as Edmonds, which has an aging infrastructure and increasingly limited options for funding either needed maintenance or system enhancements.
- C-007-011** We appreciate the opportunity to review and comment on the Vision2020+20 update and DEIS. Although 60 days sounds like a long time, we can assure you that we have only been able to touch the surface of the plan and its documentation. We encourage you to take the time necessary to work specifically with each jurisdiction – including Edmonds – in developing a preferred alternative and addressing regional governance issues. We believe we can provide important information and input that will help lead to a realistic and positive regional vision that can be implemented by all concerned.

Sincerely,



Gary Haakenson
Mayor, City of Edmonds

C-007-009

Comments noted. The Preferred Growth Alternative was developed as a hybrid of the initial four alternatives studied in the Draft Environmental Impact Statement, and is defined in a manner that is meant to be both an ambitious and achievable approach for managing the region's future growth.

C-007-010

As part of the VISION's implementation program, the Regional Council intends to continue to work with the region's jurisdictions to explore a regional funding initiative that considers state, regional, and local revenue to address the impacts of growth.

C-007-011

Concur. The public outreach process for VISION 2040 is the most extensive PSRC has conducted in over a decade. It included extensive outreach to local jurisdictions and agencies, three formal public comment periods, three EIS documents, a draft and final VISION, as well as numerous other publications. This was done to provide jurisdictions such as yours a number of opportunities to provide input into the VISION update process.



OFFICE OF THE MAYOR

Ray Stephanson
Mayor

July 31, 2006

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 PSRC Vision 2020 + 20 DEIS

Dear Mr. Abbott:

The City of Everett appreciates the opportunity to comment on the Draft EIS for the Vision 2020 + 20 update, and we look forward to helping to define how the region chooses to shape the form and character of growth beyond current comprehensive plans, to the year 2040. City elected officials and staff members have participated in various committees of the PSRC and have advised PSRC staff in the development of the 2020 + 20 update. We offer the following comments for your consideration in the refinement of the alternatives and selection of a preferred alternative.

1. The DEIS is an ambitious undertaking and represents quality technical work identifying the impacts of 4 distinct growth alternatives on a broad, regional level.
2. The definition of the 4 alternatives takes a unique approach using regional geographies. With the exception of the Growth Targets Extended alternative, they do not represent realistic models of how growth is likely to occur, given the forces of the real estate market place. They do, however, represent a range of growth scenarios that illustrate the potential for environmental impacts, which should be useful in selecting a preferred alternative that recognizes the realities of the market place and protects our quality of life.
3. The process to select a preferred alternative should begin with the existing Vision 2020 growth and transportation strategy. All of our comprehensive plans are based on this growth strategy. This strategy should be refined to promote a sustainable development pattern that provides a range of housing choices and job centers served by quality public infrastructure and services.
4. The selection of a preferred alternative should be guided by principles that state the values we are trying to preserve, protect and promote. The letter from Snohomish County Tomorrow identifies several important principles that should be useful to guide the selection of the preferred alternative.

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

C-008-001

Thank you for your comment regarding the scope of the effort and the alternatives that have been developed for the region's consideration.

C-008-002

Comment noted.

C-008-003

The process to develop VISION 2040 and the Preferred Growth Alternative did begin with the adopted VISION, and as noted in your comment has been revised to make sustainability a more central theme.

C-008-004

Comment noted. See VISION 2040's Regional Growth Strategy.

C-008-001

C-008-002

C-008-003

C-008-004

C-008-005

5. The DEIS information providing assumptions about the population and jobs to be added to each city should not be part of the preferred alternative. The existing processes provided by GMA and countywide planning policies will determine actual growth assignments or targets. However, a non-binding countywide total growth target may be appropriate as a guide for each county and its cities to use for future growth planning purposes.
6. The preferred alternative should take a strong position on the form that future growth in the region should take. The DEIS has done a good job of characterizing the generalized impacts of 4 alternatives. The preferred alternative should identify and incorporate those policy choices of the alternatives that have the least overall impact on the natural, built and human environment, but that also provide for the economic vitality of the region.

C-008-006

7. The preferred alternative should also be based on the realities of what local governments can afford to provide for infrastructure and services, and/or identify mitigation measures and revenue sources that could support the infrastructure and services to support the increased population and job levels. The original Vision 2020 was adopted prior to voter-approved initiatives that have seriously reduced local government's ability to fund public infrastructure and services. Assumptions about local government revenues should be adjusted to reflect these greater limitations, or other potential revenue sources should be identified as mitigation measures, especially for those communities expected to accommodate significant increases in jobs and population.

C-008-007

8. Everett strongly supports an improved jobs-housing ratio in Snohomish County as a means of reducing transportation demand (to jobs in King County), reducing air quality impacts, and strengthening the local economies of cities in the county. The preferred alternative should include transportation investment strategies to support increased job growth in the county. The region can support a significant amount of job growth without costly road infrastructure improvements just by making use of the existing capacity available in the reverse commute.

C-008-008

9. The current effort to site a 4-year university in Snohomish County will support increased employment in the county. We assume that the university will be a key part of the Snohomish County community well before 2040. A university with a strong science and technical focus could become a magnet for job creation and growth in the region.

C-008-009

10. The growth levels assumed for individual cities in the DEIS have alarmed some cities that do not believe the opportunity exists to increase densities or growth levels significantly beyond existing comprehensive plan designations. This suggests that a regional growth strategy that does not promote sprawl will require using the "centers" approach as a means of providing high density areas to accommodate the overall 2040 levels of growth in the region.

C-008-005

The Final EIS includes revisions and clarifications to the alternatives and the planning process, largely in response to public comments on the Draft EIS and Board direction. This includes changing the level of definition for all alternatives to be at a regional geography level, rather than by individual jurisdiction. Clearly, market forces could affect the extent and location of growth over time, but PSRC believes that the broad patterns of growth explored by the alternatives provided illustrations of the more likely patterns that could occur.

C-008-006

The Board agreed with the comments to include a strong implementation plan for the VISION, and developed the VISION and the multicounty planning policies within this context. As part of the VISION's implementation program, the Regional Council intends to continue to work with the region's jurisdictions to explore regional funding initiatives that consider state, regional, and local revenue to address the impacts of growth.

C-008-007

VISION 2040's Regional Growth Strategy is based on promoting a closer balance between housing and jobs at the regional geography and county levels. This involves adding housing to job rich areas and adding jobs to housing rich areas. Also, VISION 2040 contains multicounty planning policies that recognize the importance of creating a jobs/housing balance and connections between housing areas and employment areas, and call for an increased share of employment growth to major cities outside of King County.

C-008-008

Thank you for your comment. Your support for a 4-year university in Snohomish County has been noted. The alternatives considered in the

- C-008-010** 11. Downtown Everett is a designated metropolitan center in Vision 2020, and expects its role as a significant center for job and population growth to increase by 2040. There are other candidate areas for increased employment and population growth in the City and other cities in Snohomish County. If these candidate centers are not specifically designated in the preferred alternative, a policy should be included for the designation of such growth centers within local comp plans and countywide planning processes.
12. In 1994, Everett's comprehensive plan identified a number of "potential activity centers" and "potential growth centers" in which additional mixed use redevelopment is encouraged. The role of these locally designated centers will become increasingly important areas for accommodating job and housing growth in Everett.
- C-008-011** 13. In addition to these designated centers, Everett's comprehensive plan designates "mixed use corridors" that can also accommodate additional mixed use in commercial zones found along arterial corridors and state highways. Many of these areas are currently developed with oversize parking lots and single story commercial buildings that could be redeveloped with multi-story mixed use buildings with either less off-street parking or structured parking. The prevalence of similar underutilized properties throughout the region suggests that other cities and counties could substantially increase growth capacity by making use of the centers and corridors already designated or by designating additional centers.
- C-008-012** 14. Everett is willing to accept additional job and population growth beyond the growth targets established in our comprehensive plan for 2025. However, we are unable to commit to any specific population and employment targets for the 2040 time frame of the Vision 2020 + 20 update. That decision process will take place in future comprehensive plan update cycles, in conjunction with Snohomish County and other cities in the county, consistent with our countywide planning policies.
- C-008-013** 15. However, we do support a countywide and 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-008-014** 16. 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.
17. Good design will be a key to making higher density redevelopment more acceptable in any community. One component of quality design is the ability of residents to travel without having to drive to nearby shops, services and activities. While we expect the private automobile will continue to be a preferred mode of travel for most people, it is already becoming much costlier, and people will need alternative modes and choices. Those who choose to live in higher density centers should be able to use modes other than SOV's to access jobs, shopping and services. This will be a design challenge in many of the future centers that today do not have the land use pattern or infrastructure to promote a compact, pedestrian oriented environment.

FEIS, including the Preferred Growth Alternative, are broadly defined to allow such future decisions to be made.

C-008-009

VISION 2040 continues to emphasize the important role of centers and compact urban communities in accommodating future populations and employment.

C-008-010

VISION 2040 recognizes existing regionally designated centers and calls for an additional set of sub-regional centers to be established at the countywide level. It also calls for more local serving centers as well.

C-008-011

VISION 2040 policies discuss the development potential of corridors.

C-008-012

Comment noted. As noted in your comment, implementation of the PGA will be accomplished through local plans, which provides the opportunity to ensure that the regional VISION is implemented in a manner responsive to local situations.

C-008-013

VISION 2040 addresses these issues.

C-008-014

The Preferred Growth Alternative envisions the vast majority of growth to be located in cities and urban areas. As noted in the comment, design at a variety of scales (regional, local, site) will be important in ensuring that growth is accommodated in a manner that meets the needs and desires of local communities. Accordingly, VISION 2040 contains a set of

Norman Abbott, PhD
July 31, 2006
Page Four

C-008-015

18. The regional growth strategy cannot be successfully implemented without the full extension of light rail to serve the downtown Everett metropolitan center. Serious consideration should also be given to serving the Paine Field / Southwest Everett / Boeing Manufacturing and Industrial Center, since it has the largest concentration of employment in Snohomish County.

C-008-016

19. For a plan with a horizon of 2040, consideration should also be given to extending the regional high capacity transit system well beyond current RTA boundaries.

We appreciate the efforts the PSRC has made to reach out to all member jurisdictions. We look forward to continued collaboration in the refinement of the region's plan for shaping growth far into the future. Please feel free to contact Allan Giffen, Planning Director, at (425) 257-8731 if you have any questions about our comments.

Sincerely,


Ray Stephanson
Mayor

c: City Council
Allan Giffen, Planning
Tom Hingson, Transportation Services
Dave Davis, Engineering

policies related to "regional design." For more information see the Informational Paper - A Regional Design Strategy, which is included as Appendix I-F.

C-008-015

PSRC agrees that significant multimodal transportation improvements will be needed to support the demands of future growth throughout the region. However, the scope of the analysis at a regional scale does not support a conclusion that one or more of the alternatives cannot be reasonably implemented without a specific project such as light rail. These decisions will be made through related planning processes including through the Destination 2030 update, Sound Transit's planning, and through project-level planning.

C-008-016

Detailed decisions related to specific transportation districts, projects, and other infrastructure needs and their implementation is beyond the scope of the VISION 2040 project, which is focused on determining how and where growth might best occur in the region, and used the adopted Destination 2030 for the transportation performance analysis. While transportation is a critical issue, it must be balanced along with a wide range of environmental, economic, and public policy factors that must be considered in the planning process. However, subsequent transportation planning efforts such as a major update to Destination 2030 will be considering strategies for developing the multimodal transportation system improvements needed to support the long-range needs of future growth.

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PUGET SOUND REGIONAL COUNCIL



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

July 27, 2006

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

Mr. Abbott:

Thank you for the opportunity to comment on the Vision 2020 Update - Draft Environmental Impact Statement (DEIS). 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 local outreach by PSRC staff to help us in evaluating the DEIS.

Our observations on the Vision 2020+20 DEIS are presented here in two sets. The first set contains items more generally applicable to the Vision 2020 Update as a whole. The second set provides more detailed observations specific to the City of Issaquah. I hope these comments are helpful in the effort to craft the best regional plan possible.

DEIS General Observations

C-009-001

1. Local Control as a Fundamental Principle of GMA: The state Growth Management Act (GMA) gives cities and counties broad discretion in local comprehensive plans to make many choices about accommodating growth. While all jurisdictions need to accommodate a fair share of new growth (in the current planning period and beyond); the necessary foundation for the future is largely present in existing comprehensive plans. Parts of the DEIS seem to imply that future targets may be assigned at the regional level. Observations in this regard include:

- Significant departures from existing plans such as allocation of growth targets and/or establishment of minimum densities at the regional level do not seem to be necessary.
- Caution is recommended in construing essential public facilities case law into a foundation for issuing broad mandates to local governments (as seems to be implied in DEIS Chapter 7 on Multicounty Planning Policies or MPP's).
- An "overarching goal" for preferred alternative selection should be retention of the greatest degree of self-determination through local land use control consistent with the foundations of the GMA.

C-009-001

VISION 2040 respects local control, and builds from existing local plans. The Final EIS included additional discussion of how the VISION update responds to and supports the requirements of the Growth Management Act, both at the regional and at the county and local levels. This includes the development of multicounty planning policies, as well as the VISION itself and the identification of a Preferred Growth Alternative.

C-009-002

2. Future growth should be focused within the existing Urban Growth Boundary: Issaquah has historically agreed with this position. It appears, however, that a hybrid alternative is needed to implement this primary goal. Each of the four alternatives presented in the DEIS appears to contain positive aspects, but each also appears to contain potential flaws in underlying assumptions and/or result in unacceptable environmental impacts. Observations in this regard include:

- A hybrid needs to be developed that promotes a regional growth pattern of compact urban growth that is built upon actual 2006 population distribution and upon local decisions reflected in current comprehensive plans.
- Further development of the sub-regional centers concept should take place and be the focus of regional geography rather than classification of cities as a whole.
- Incentives should be developed and implemented to help local governments accomplish regional goals while being consistent with local needs.
- In the hybrid, PSRC should project annexation of all municipal PAA's by 2040. This would provide a more accurate picture of future growth and would direct attention to any unaffiliated UGA which may benefit from further analysis.
- Caution is recommended in placing too much emphasis on the current model results, such as those produced by INDEX (a land use computer model), as the only means of preferred alternative selection due to the sheer number of variables involved.
- Formal data verification should take place with each jurisdiction in the development of a hybrid alternative.

C-009-003

3. Enhanced Coordination of Regional Land Use And Transportation Planning:

a. Transportation Planning: The Vision 2020 update DEIS appears to defer many transportation planning decisions to a future Destination 2030 update. Under GMA, local governments must ensure the internal consistency and concurrent adoption of land use and transportation elements; this approach seems desirable for the region as well. Observations in this regard include:

- Consider deferring adoption of the Vision 2020 update until a concurrent update to Destination 2030 can be developed.
- The DEIS does not provide sufficient detail to determine impacts to specific roadways, especially those of regional significance, under any alternative. This seems to support the need for concurrent development of a Destination 2030 update prior to plan adoption.
- Ideally, a comprehensive transportation update should also be more integrated with the current ST2 process and/or results to ensure consistency on the regional transit infrastructure needed to support projected growth.

C-009-004

b. Concurrency: A basic GMA concept is that future population and employment growth should be directed to those areas with current and/or planned infrastructure to serve that growth. Any Preferred Alternative should help direct transportation funding in the region so that the necessary transportation improvements to support the desired growth pattern are in fact provided. Observations in this regard include:

C-009-005

- Simply allowing higher levels of congestion as stated in the DEIS is not an acceptable mitigation strategy as suggested (DEIS Transportation Section 5.3). Greater specificity is needed on impacts and proposed mitigation.

C-009-006

- The DEIS should identify implementation methods in more detail. Additional mechanisms to control the amount, timing and location of new growth should be considered for instances where funding may fall short of projections and impact local levels of service. If funding is insufficient, the regional plan, like local plans, should be re-evaluated to ensure consistency as required by state law.

C-009-002

Through comments such as yours, PSRC developed a Preferred Growth Alternative definition that combined attributes of several of the alternatives. The PGA was reviewed in a Supplemental Draft EIS prior to the issuance of the Final EIS. This allowed for the type of data verification suggested in your comment. Also, VISION 2040 includes a technical amendment process to adjust the Regional Growth Strategy to reflect annexations and other population and employment changes. Finally, VISION 2040 policies have been developed that address many of these issues, such as annexation of PAAs, developing incentives, and more.

C-009-003

As in previous regional planning efforts (and similar to planning methods used by cities and counties under GMA), PSRC envisions implementation of VISION 2040 and the update to Destination 2030 to continue to be a collaborative, iterative process. Given the large regional scale of the project and the broad nature of the decisions to be made, more detailed analysis of impacts or the needs of a specific facility are not needed in order to determine the nature and magnitude of impacts of the alternatives.

C-009-004

As part of the VISIONS's implementation program, the Regional Council intends to continue to work with the region's jurisdictions to explore regional funding initiatives that consider state, regional, and local revenue to address the impacts of growth.

C-009-005

This statement regarding potential changes to concurrency standards pertaining to congestion was preceded by other potential mitigation measures focused on improvements to facilities, service levels,

C-009-006

- New techniques to fund critical infrastructure should be considered.
- Funding mechanisms should retain equity for purposes of regional mobility within the Urban Growth Area and not be exclusively focused on regionally preferred geographies.
- The Preferred Alternative should provide much more detail about implementation features such as plan certification and/or transportation funding criteria to ensure opportunity for review by all jurisdictions.

C-009-007

4. Enhance Focus on Affordable Housing: The DEIS recognizes the importance of jobs and housing balance as well as the continued pressure on housing affordability; especially when projecting needs to the year 2040. Success in this area will require enhanced efforts. Observations in this regard include:

- Additional emphasis on housing affordability should be included in the Preferred Alternative addressing housing accessibility across the economic spectrum and influence on transportation systems.
- Jobs to housing ratios, while a helpful indicator, do not seem to provide the level of detail needed to fully assess transportation opportunities and/or choices. Consider the development of additional indicators where possible.

Issaquah-Specific Observations

1. Data Corrections: The entire DEIS appears to flow from the population and employment assumptions established in DEIS Appendix D for the various PSRC computer models. Corrections appear necessary to data for the City of Issaquah. Observations in this regard include:

C-009-008

- The DEIS uses year 2000 as baseline, when Issaquah had 11,212 within the city limits, but all DEIS maps show the 2006 boundaries that already contain over 23,000 people. The need for the DEIS to have a common baseline (2000 Census) appears to have resulted in flawed numbers for jurisdictions such as Issaquah that have had significant annexations in the last 6 years. This may have also resulted in miscalculations to some extent in regard to unincorporated UGA projections.
- The models should be adjusted to more accurately reflect existing population and comprehensive plan capacities. If many jurisdictions have similar findings, this could significantly change many of the DEIS conclusions.

C-009-009

- The map in Figure 5-3-2 represents the Issaquah Transit Center in the wrong location. It is currently under construction on the King County Park and Ride site along State Route 900.

C-009-010

- There also appears to be a question regarding indicators in Figure 5-3-4. While transit infrastructure and mode share are projected to greatly increase by 2040 with the "Growth Targets Extended" Alternative; transit accessibility is projected to decline from year 2000 levels. This seems counterintuitive.

2. DEIS Alternatives: While already stated that the City of Issaquah supports development of a hybrid alternative as the Preferred Alternative, it seems important to note specific concerns with four DEIS alternatives currently under review. Observations in this regard include:

capacity, or system management. As noted in the same paragraph, more specific mitigation measures for individual modes and facilities will be defined through the update of Destination 2030.

C-009-006

See response to C-009-004. Also, 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. Further, recognize that implementation of VISION 2040 and the PGA will be accomplished through local plans, which provides the opportunity to ensure that the regional VISION is implemented in a manner responsive to local situations.

C-009-007

VISION 2040 addresses these issues, with policies related to affordable housing and related to jobs-housing balance.

C-009-008

Cities were grouped into their respective regional geographies based on year 2000 population numbers from U.S. Census, and PSRC employment numbers from estimates derived from the Washington State Department of Employment Security. PSRC recognizes that as cities continue to grow, both through net increase and through annexation of unincorporated areas, their population and employment levels may change significantly. To correct for these changes, VISION 2040 includes a technical amendment process to potentially reclassify cities before the region's counties undertake the next round of Growth Management Act target-setting work.

C-009-011

- "Smaller Cities" Alternative: The Smaller Cities alternative projects Issaquah in 2040 with roughly 34% less population than the current 2006 population. There appears to be similar concerns with the projections for other cities as well. This does not appear to be a realistic alternative by any measure.
- "Targets Extended" and "Metropolitan Centers" Alternatives: These alternatives do not accurately reflect the Issaquah Comprehensive Plan. Issaquah nearly contains the projected 2040 population of both alternatives today. This is likely related to the annexations of the last few years already noted in the data comments. Data refinement is encouraged to ensure that all jurisdictions have their comprehensive plans accurately represented as the Preferred Alternative is developed.
- "Larger Cities" Alternative: The "Larger Cities" Alternative does not appear to be locally sustainable as determined by the Issaquah Comprehensive Plan. It significantly exceeds the planned growth capacity of Issaquah (within our 2006 boundaries), particularly in terms of potential employment. This alternative could nearly double total peak hour trip generation from levels projected for Issaquah in 2022 and would likely result in numerous transportation concurrency failures. (This would be compounded by impacts from similar growth projected for Sammamish.) This alternative could also result in contradictory mandates (through increased impervious surfaces) with State required environmental protections of local shorelines, streams, wetlands, and aquifer recharge areas in a community that has many such environmental features. The DEIS does not provide detail to determine impacts to specific roadways or aquatic features nor does it identify sufficient mitigation for those impacts which can be estimated from the information provided. The "Larger Cities" alternative appears to be problematic and is not supported by the City of Issaquah.

C-009-012

Please continue to provide all relevant information and notification of opportunities to participate in the planning process as the Vision 2020 Update moves ahead. We look forward to working with the PSRC in developing a preferred alternative that we can all endorse and that will serve the region well.

Sincerely,



Ava Frisinger
Mayor, City of Issaquah

cc: Issaquah City Council
Mark Hinthorne, Director of Planning

C-009-009

The map shows the existing and planned transportation system in Destination 2030, which was used as the basis for the transportation analysis in VISION. When Destination 2030 is updated, the maps will be updated.

C-009-010

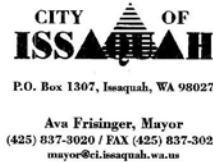
Figure 5-3-4 has been updated to include the Preferred Growth Alternative, but the measure was intended to show that some scenarios would worsen conditions compared to today. Some of the growth alternatives, including the Preferred Growth Alternative, show improvement over today, but the forecasts indicate that accessibility could decline with other alternatives. If alternatives focus more growth in lower density areas, the proportion of people living near transit would decline overall.

C-009-011

PSRC has refined the alternatives to address such issues, and removed the numeric assignments of growth for individual cities. The growth distribution now reflects larger regional geographies and classes of urban areas.

C-009-012

As a plan-level or programmatic environmental document, the FEIS does not attempt to identify impacts to specific locations or facilities, but instead describes the likely level of impacts that typical facilities or resources may encounter. This is in keeping with the broad and conceptual nature of the growth alternatives themselves.



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

July 31, 2006

Thank you for the opportunity to provide the following comments on the Draft EIS. Our joint comments were developed by representatives from Issaquah, Redmond and Sammamish and represent common views among the three cities. We also have sent comments individually and in coordination with the Suburban Cities Association.

- C-010-001** | **Local Control.** The Preferred Alternative and Multi-County Planning Policies (MPP) must preserve the authority to make important land use and density choices at the local level.
- C-010-002** | **Fair Share.** All jurisdictions must accommodate their fair share of new growth. Future growth should: 1) be focused within the existing UGA, 2) make efficient use of land while respecting environmental needs, and 3) achieve a compact urban pattern of development containing a range of densities.
- C-010-003** | **Better Coordination.** To be successful, the land use, transportation, and economic development planning in our region must be coordinated.
- C-010-004** | **Appropriate Urban Densities.** Our cities would not support development or adoption of a MPP that would establish a specific, quantitative threshold for urban residential density. Such a policy would overly restrict local flexibility and discretion in planning for growth.
- C-010-005** | **Concurrency and Level of Service.** Similarly, our cities would not support development or adoption of a MPP or evaluation criteria for local plans that would establish a regional or sub-regional level for transportation concurrency or levels of service.
- C-010-006** | **Infrastructure.** The Preferred Alternative and associated MPPs are dependent upon adequate transportation funding in the region so that the necessary transportation improvements to support that growth are in fact provided. If funding is insufficient, the region and local jurisdictions should re-evaluate the land use plan to ensure consistency as required by state law.

We look forward to the Supplemental Draft EIS, Final EIS and related policy discussion in the coming months. Please contact the Directors of Planning or Community Development in each of our cities if you have questions.

Sincerely,

Ava Frisinger

Ava Frisinger
Mayor
Issaquah

Rosemarie M. Ives

Rosemarie M. Ives
Mayor
Redmond

Ben Yazici

Ben Yazici
City Manager
Sammamish

C-010-001

VISION 2040 respects local control. As a membership organization, the members govern the Regional Council. VISION 2040 provides regional agreement and guidance that helps local governments achieve objectives that they cannot accomplish working alone (such as the designation of Regional Growth Centers).

C-010-002

The Preferred Growth Alternative builds upon local plans and distributes growth based on a focused growth strategy. Implementation of the PGA will be accomplished through local plans, which provides the opportunity to ensure that the regional VISION is implemented in a manner responsive to local situations. Also, the PGA does focus growth inside the urban area to create strong communities, minimize environmental effects, and efficiently use land. VISION 2040 multicounty planning policies also address these issues.

C-010-003

Concur.

C-010-004

VISION 2040 and its Regional Growth Strategy do not include a numeric minimum density threshold.

C-010-005

VISION 2040 policies related to concurrency speak to multimodal options and tailoring programs for centers.

C-010-006

VISION 2040 actions call for collaborative work at the regional level to seek to create additional resources for infrastructure. Also, VISION 2040 implementation actions call for the Regional Council to explore regional

funding initiatives that consider state, regional, and local revenue to address the impacts of growth.



The City Of Kenmore

P.O. Box 82607 • Kenmore, Washington 98028-0607

July 27, 2006

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JUL 31 2006
PUGET SOUND REGIONAL COUNCIL

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

Dear Mr. Abbott,

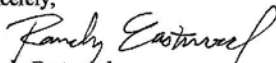
Thank you for the opportunity to provide comments on the Draft EIS for the Vision 2020 Update. We received a presentation on the draft plan from Yorik Stevens-Wajda at our July 24th Council meeting and appreciated the information he provided.

Given that the comment period expires July 31st, we will not have the opportunity to sufficiently discuss the information received from Mr. Stevens-Wajda prior to that date. However, we will submit brief comments that we were able to discuss at the meeting knowing there will be further opportunities for comments during the processing of the plan update.

Attached to this letter is a list of comments/concerns we voiced during the July 24th meeting. They are not listed in priority order. We look forward to receiving your responses to our comments and are prepared to continue our participation in this regionally significant planning process.

We wish you every success as you deliberate on the preferred growth alternative and the Multi-county Planning Policies.

Sincerely,


Randy Eastwood
Mayor

Attachment

C: City Council Members

6700 NE 181st Street • Office: 425-398-8900 • FAX: 425-481-3236

Email: cityhall@ci.kenmore.wa.us

website: www.cityofkenmore.com

City of Kenmore
List of Comments on Vision 2020 Update Draft EIS

C-011-001	1) We question the employment numbers assigned to the city for 2000. The identified employment level of 5122 used in the Draft EIS appears to us to be too high given our knowledge of our community. Please provide detail how this number was derived for Kenmore.
C-011-002	2) Assigning growth under the Preferred Growth Alternative (PGA) doesn't necessarily result in the City receiving transportation funding from PSRC to assist us with concurrency. What guarantee do we have that if we accept the growth assignment that transportation dollars to help fund our transportation needs will follow?
	3) Instead of the PSRC assigning population growth and employment growth through the PGA, why not have the market dictate where growth in population and jobs will occur?
C-011-003	4) The numbers that you use for population and for employment seem to double count people. For example, many people who reside in Kenmore also work in Kenmore so are counted in both the population and the employment figures which skews the numbers. How does your model square this anomaly?
C-011-004	5) The City's comprehensive plan indicates that we have capacity for 2022 of 4,637 households, yet you are suggesting we have capacity beyond that number. For example, under the Large Population allocation alternative the City would be required to plan for an estimated additional 12,268 households and the Metropolitan alternative would require 6,132 households. We have neither the land area nor the transportation infrastructure to handle those additional households. Why are you allocating more when our capacity is less than the allocation?
C-011-005	6) Given the requirement to absorb additional population and employment in the four county region, additional impervious surfaces will result which will lead to increased problems with surface water run off. For example Kenmore is on the north end of Lake Washington and should be considered a more sensitive area. The effect of such an increase in density has a direct impact on the discharge of pollutants into Lake Washington. The increase in impervious surface and the corresponding direct runoff into the lake needs to be taken into account for GMA compliance. Have you truly analyzed the environmental impact of surface water run off?
C-011-006	7) The City boundary includes a 360 acre State park that is presently zoned R-4 (four single family units per acre). This land will not be developed to that standard because it is a park and will remain a park into the foreseeable future. Does the capacity model include these 1,440 single family parcels (which translates to approximately 3,554 potential residents and, if so, shouldn't they be deducted from potential capacity?
C-011-007	8) Does the model include analysis of traffic patterns because not everyone lives where they work?
C-011-008	9) We neglected transportation planning too long and are now playing catch up. We need money now to improve the transportation system, not in the out

C-011-001

Cities were grouped into their respective regional geographies based on year 2000 population numbers from U.S. Census, and PSRC employment numbers from estimates derived from the Washington State Department of Employment Security. PSRC recognizes that as cities continue to grow, both through net increase and through annexation of unincorporated areas, their population and employment levels may change significantly. To correct for these changes, VISION 2040 includes a technical amendment process to potentially reclassify cities before the region's counties undertake the next round of Growth Management Act target-setting work.

C-011-002

VISION 2040 does not "assign" growth, rather it provides regional guidance that will be used in the next round of setting growth targets. There is no guarantee of funding. However, VISION 2040 is meant to show leadership, and build on existing processes and plans rather than maintaining the status quo. Based on public comment, VISION 2040 focuses on new issues, establishes new areas of regional agreement, and establishes actions and measures. This includes an action to work collaboratively with local governments on a regional funding initiative to help jurisdictions accommodate growth.

C-011-003

The Final EIS includes revisions and clarifications to the alternatives and the planning process, largely in response to public comments on the Draft EIS and Board direction. This includes changing the level of definition for all alternatives to be at a regional geography level of detail, rather than by individual jurisdiction. Note that VISION 2040 alternatives planned for both population and employment.

C-011-008	years of Vision 2020 and certainly not until 2040. People with traffic problems could be forced to move and take businesses with them. Currently there are no concurrency plans to accommodate the increase in traffic. What will PSRC do in the short term to assist the region with additional transportation improvement dollars?
C-011-009	10) The energy crisis is becoming more critical. Recently in New York City, power to high rises was out for more than four days. People cannot get to the upper floors because the elevators do not work and people are too frail to walk up the flights of stairs to get to their living quarters. This type of event is becoming more common and may result in a shift from the current philosophy of developing up instead of out. Instead, there may not be a market for high rises and we will have to build out instead of building up. Has PSRC considered this possible change in future buyer behavior in the allocation models?
C-011-010	11) With the issues of concurrency, regional transportation patterns and transportation funding issues, how are we going to move forward on Vision 2020+20?
C-011-011	12) Kenmore recognizes that the alternatives presented are conceptual in nature and that the selected preferred alternative may be a hybrid of the four alternatives. Kenmore is concerned that a preferred alternative that is aligned more closely with the "Larger Cities" alternative will have a significant localized impact on infrastructure, public services and facilities. Further, existing plans and policies would likely need to be revised to allow higher amounts of growth.
C-011-012	13) Kenmore advocates for MPPs that recognize local discretion and authority and would oppose MPP's that for example dictate a quantitative threshold for urban density, or establish prescribed levels of service and concurrency standards.
C-011-013	14) Kenmore supports an approach that coordinates transportation planning and funding with the selected preferred alternative. Funding for necessary infrastructure (in particular transportation improvements) needs to be available to be able to accommodate projected growth.
C-011-014	15) Since the GMA's intent was to respect local government control, and since the PSRC's alternatives focus mostly on a some-what arbitrary allocation of population without consideration for concurrency and environmental impacts, any recommendations made by the PSRC should be advisory only, and this should be clearly stated.
C-011-015	16) The allocation of population appears to be uncoordinated, for example: under the large cities alternative, Large Cities and Core Cities take 30% each of the population growth. Kenmore (a Large City) would take an increase in population of 30,277 while our neighbor Bothell (a Core City) would take an increase in population of 29,002. Yet, Bothell has twice as much land mass (12 square miles) as Kenmore (6 square miles).
C-011-016	17) GMA Economic Development Requirement: The increase in density, without the corresponding increase in infrastructure is inconsistent with GMA

C-011-004

See response to C-011-003. The growth alternatives do not represent the results of a capacity analysis. In developing the conceptual alternatives, PSRC assumed that under some scenarios, changes in comprehensive plans and zoning would be needed to achieve higher growth than some cities might currently be planning for. Instead, VISION 2040 represents regional guidance rather than a local or comprehensive plan level of analysis. VISION 2040 covers a very large geography, looks very long range, and is less detailed than local comprehensive plans. Subsequently, the appropriate local role is for local comprehensive plans and the targeting process to then determine how it works in each jurisdiction.

C-011-005

Text within the Final EIS has updated the discussion of impervious surfaces. The broad conceptual nature of the alternatives, which does not involve site-specific assignments of growth, does not lend itself to a highly detailed discussion of impacts at a localized level such as within the watersheds leading to Lake Washington. Rather, the FEIS analysis focuses on typical impacts, potential mitigation, and provides a comparison of the likely performance of the alternatives. This is appropriate for a programmatic action such as the VISION update, which is not a comprehensive plan such as would be developed by cities and counties under GMA.

C-011-006

See response to C-011-004 and 005 regarding the scale of the analysis.

C-011-007

Yes, PSRC's traffic model does include analysis of traffic patterns, which

C-011-016	principles and can only be expected to have a very negative effect on our economic development.
C-011-017	18) Kenmore was incorporated in 1998 and inherited a rural infrastructure and an unusually limited tax base. Almost all of our streets have drainage ditches and no sidewalks and are not up to today's standards. Our Jr. High cross-country team takes their lives in their hands every time they run in Kenmore. Public Health and Safety need to be included as a primary GMA Goal.
C-011-018	19) Finally, the principal purpose of GMA is to plan for "sustainable" and "livable" communities through the politics of compromise. We need to recognize that the PSRC plan does not address the issue of compromise and is not balanced or coordinated enough to reasonably expect us to be able to meet this ultimate goal. As such, its shortcomings and limitations need to be acknowledged and its authority appropriately limited.

is based on existing and planned transportation improvements in Destination 2030.

C-011-008

Comment noted regarding the importance of the public's willingness at the local level to participate in funding infrastructure to support growth. VISION 2040 implementation actions call for the Regional Council to explore a regional funding initiative that considers state, regional, and local revenue to address the impacts of growth. Also, VISION 2040 contributes by advancing a growth strategy that is cost effective as compared to other alternatives that were studied in the update process.

C-011-009

PSRC has not considered this particular scenario in developing the growth alternatives evaluated in the Final EIS, and instead relied upon an array of land use characteristics and existing plan factors to paint the alternatives that would be considered most likely to occur. However, the FEIS and the VISION discuss the need for more aggressive energy conservation plans as well as improved technology, which can help reduce risk of widespread equipment failure.

C-011-010

See response to C-011-008.

C-011-011

Comment noted.

C-011-012

VISION 2040 and its Regional Growth Strategy do not include a numeric minimum density threshold, nor do they set a level of service for concurrency.

C-011-013

VISION 2040 calls for prioritizing funding in areas receiving growth. Also, VISION 2040 actions call for collaborative work at the regional level to seek to create additional resources for infrastructure.

C-011-014

VISION 2040 respects local control. As a membership organization, the members govern the Regional Council. VISION 2040 provides regional agreement and guidance that helps local governments achieve objectives that they cannot accomplish working alone (such as the designation of Regional Growth Centers).

C-011-015

See response to C-011-003.

C-011-016

Comment noted. To help address this, VISION 2040's Regional Growth Strategy was selected, in part, as the growth alternative that is cost effective.

C-011-017

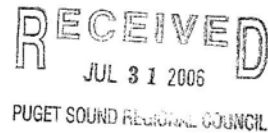
PSRC appreciates the additional information about the City of Kenmore and its infrastructure and safety needs. VISION 2040 includes the issue of public health.

C-011-018

Sustainability is a core concept of VISION 2040, and the VISION's provisions are tailored to be within the authority of the Regional Council's mandates under state and federal law and its interlocal agreement with its members.

July 27, 2006

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



RE: Vision 2020 Update Draft Environmental Impact Statement

Dear Mr. Abbott:

The Kirkland City Council has reviewed the Draft EIS for the Vision 2020 Update and would like to offer the following comments for consideration in the preparation of the Preferred Growth Alternative.

- C-012-001** Generally speaking, the Council favors alternatives such as the Metropolitan and Larger Cities Alternatives which allocate a relatively large share of growth to cities with designated regional growth centers and a relatively low share of growth to rural areas. These alternatives promote compact patterns of growth that are less dependent upon automobiles for mobility and can be more easily served by other modes of transportation. They also minimize the negative effects of urbanization upon rural and resource lands, and best contain "urban sprawl."
- C-012-002** Even so, we do have questions about the ability of metropolitan and core suburban cities to realistically accommodate major portions of regional growth. In Kirkland's case, for example, the Metropolitan Cities Alternative adds nearly 30,000 people, while the Larger Cities Alternative adds almost 40,000 to our existing population. In addition, each alternative adds approximately 30,000 jobs. Kirkland already has a compact development pattern and we have planned for significant growth throughout the city, particularly within the Totem Lake Urban Center. Even so, the levels of growth anticipated by the Metropolitan and Larger Cities Alternatives are well above our current capacity.
- C-012-003** This concern has two dimensions. The first is how much growth metropolitan and core cities as a whole can accommodate. The Preferred Growth Alternative should assign these cities growth levels that are ambitious but realistically achievable. To the extent that these cities cannot accommodate the levels of growth indicated in the Metropolitan and Larger Cities Alternatives, higher growth may be required in some of the larger and smaller suburban cities and urban unincorporated areas, provided that such growth will sustain a compact urban form. In particular, urban unincorporated areas surrounded by or abutting higher growth cities should be considered for a greater share of growth.

C-012-001

Thank you for identifying your initial preferences among the alternatives. These alternatives were refined to develop the Preferred Growth Alternative, which is more similar to the focused growth alternatives such as Metropolitan Cities and Larger Cities.

C-012-002

The Final EIS includes revisions and clarifications to the alternatives and the planning process, largely in response to public comments on the Draft EIS and Board direction. This includes changing the level of definition for all alternatives to be at a regional and countywide level of detail, rather than by individual jurisdiction.

The Preferred Growth Alternative builds upon local plans. Further, implementation of the PGA will be accomplished through local plans, which provides the opportunity to ensure that the regional VISION is implemented in a manner responsive to local characteristics.

C-012-003


See answer to C-012-002. Also, note that the PGA responds to these comments and addresses these issues.

C-012-004 | The second dimension is the implication of the Preferred Growth Alternative for individual cities. As noted above, it is unlikely that Kirkland will be able to accommodate the levels of growth indicated in the Metropolitan and Larger Cities Alternatives. In part this is because we have already taken measures to promote higher densities. While city plans anticipate significant additional growth, there are limitations given existing development patterns and remaining opportunities for redevelopment. Consequently, we ask that the Preferred Growth Alternative take into account the extent to which cities such as Kirkland have already accommodated growth and achieved a compact urban form.

C-012-005 | A related issue is the role of the Preferred Growth Alternative in the assignment of growth targets to cities. It is our understanding that the PSRC does not intend that the growth levels allocated to cities and/or groups of cities in the Preferred Growth Alternative be directive to counties in the assignment of future growth targets. For the reasons noted above, Kirkland agrees that such a prescriptive approach would be highly inappropriate. We recommend, therefore, that the Multi-County Planning Policies clearly indicate this.

Thank you for the opportunity to comment on the growth alternatives discussed in the Draft Environmental Impact Statement. We look forward to further involvement as the PSRC selects a Preferred Growth Alternative and drafts new Multi-County Planning Policies.

Sincerely
KIRKLAND CITY COUNCIL



by: Jim Lauinger, Mayor

cc: David Ramsay, City Manager
Eric Shields, Planning Director

C-012-004

See answer to C-012-002. As stated above, it will be through the countywide planning process that issues such as this one are addressed.

C-012-005

Concur. See response to C-012-002.

July 25, 2006



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

Subject: Vision 2020 Update Draft Environmental Impact Statement

Dear Mr. Abbott,

The City of Lake Stevens appreciates the work done by PSRC on regional growth issues and the opportunity to comment on the Draft Environmental Impact Statement of the Vision 2020 Update. It is apparent that a great deal of thought and effort has gone into the draft of the multi-county growth alternatives and their affect on the regional environment.

C-013-001

The City acknowledges and generally supports the comments submitted by Snohomish County Tomorrow supporting a hybrid alternative that would consider our County's distinct qualities and values. However, it is also important to advise PSRC of the unique circumstances of Lake Stevens with respect to the four alternatives and the geography classifications used to evaluate and select possible future growth dispersal patterns that can affect governmental funding opportunities.

C-013-002

The City of Lake Stevens is the region's fastest growing jurisdiction. We are a "free-standing" city with a current population of 9,644. The City's UGA, including the city limits, contains a population of approximately 26,000 and growth capacity of over 50,000. The City is now two years into a six year annexation program that ultimately results in the City being the responsible authority for the entire urban area (Attachment). In other words, the City of Lake Stevens is steadily progression towards becoming a "large city" with full municipal services from a smaller "Class A" as classified by PSRC in the updated Vision 2020 document. Lake Stevens will be the largest non-Interstate 5 corridor, free-standing city in Snohomish County identified as urban in nature.

As you can see, the City is concerned about long-term implications of a classification in the planning document and how that may affect future federal or state funding opportunities and allocations. It is critical that we are accurately

1812 Main Street / P.O. Box 257 • Lake Stevens, WA 98258-0257 • (425) 334-1012 • Fax (425) 334-0895

C-013-001

Thank you for indicating the considerations Lake Stevens is taking in addressing the VISION 2040 alternatives, and for providing additional perspective on your local planning issues.

C-013-002

VISION 2040 regional geographies are defined only by population and employment thresholds. Cities were grouped into their respective regional geographies based on year 2000 population numbers from U.S. Census, and PSRC employment numbers from estimates derived from the Washington State Department of Employment Security. PSRC recognizes that as cities continue to grow, both through net increase and through annexation of unincorporated areas, their population and employment levels may change significantly. To correct for these changes, VISION 2040 includes a technical amendment process to potentially reclassify cities before the region's counties undertake the next round of Growth Management Act target-setting work.

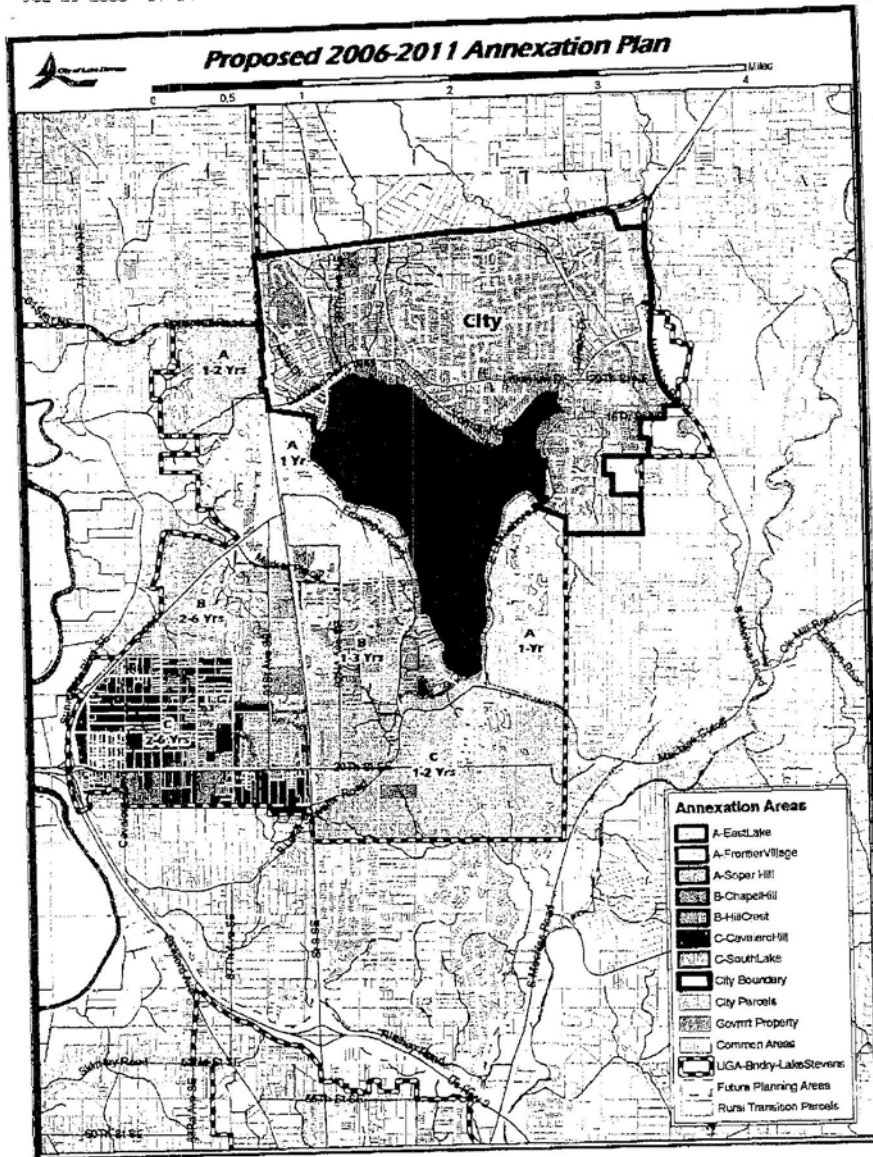
C-013-002 | categorized so that realistic and appropriate goals, policies, and implementing measures are identified for Lake Stevens.

Again, we thank you for the opportunity to comment. The City will participate as appropriate during the development of the multi-county planning policies as PSRC progresses in the update process. You may contact Mayor Walty at (425) 377-3224 or Rebecca Ableman, Planning Director, at (425) 377-3229 if you need additional information or have any questions regarding the City of Lake Stevens.

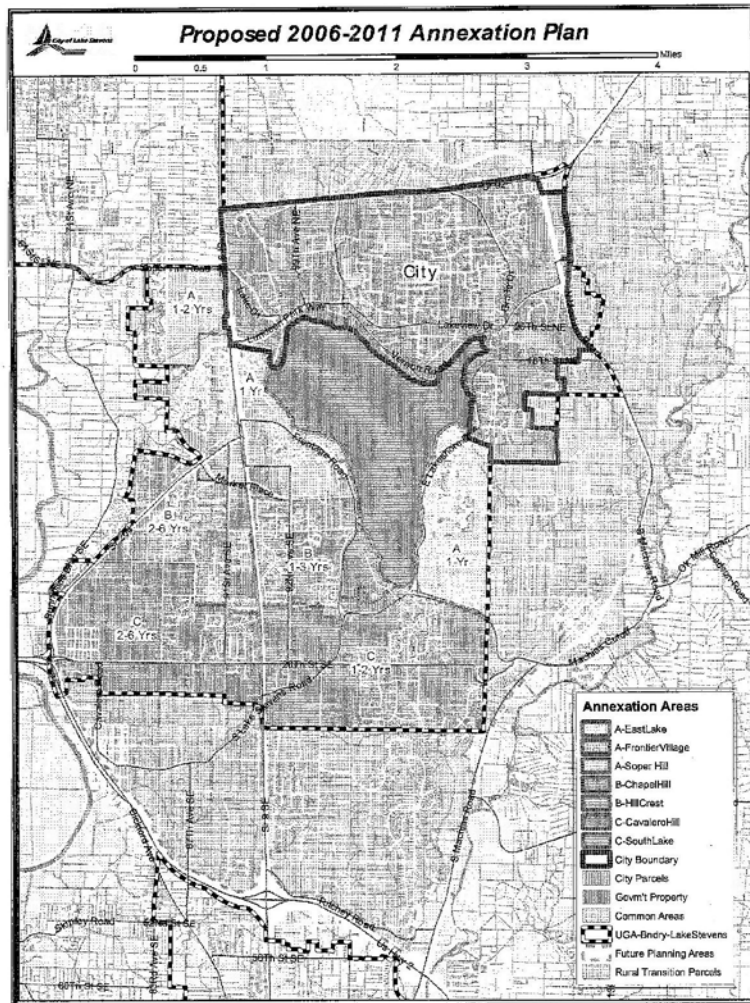
Sincerely,

		
Lynn Walty Mayor	Karen Alessi Council President	Rebecca Ableman Planning Director

CC: Snohomish County Tomorrow Steering Committee
Aaron Reardon, Snohomish County Executive
Craig Ladiser, Director, Snohomish County Planning and Development
Services



TOTAL P.03





July 31, 2006

Dr. Claudia B. Thomas
Mayor

John Arbeeny
Deputy Mayor

Ron Cronk
Council Member

Pad Finnigan
Council Member

Helan McGovern
Council Member

Doug Richardson
Council Member

Walter Neary
Council Member

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 PSRC's DEIS for the VISION 2020 update. We have the following comments:

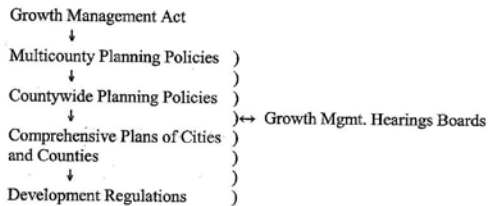
Technical corrections. P. 2.1, preface; p. 2.7, last paragraph. "Recreate" means to refresh or renew, or "to take recreation" (Merriam-Webster). Most plans using this terminology use the less stilted "live, work, and play."

P. 2.4; 2.6, 5th & 7th paragraphs. "Sea" is used in reference to Puget Sound. The USGS categorizes Puget Sound as a bay, not a sea. According to other sources, it more closely appears to classify as a fjord.

P. 2.14, 1st paragraph. "Research" is left out of WashPIRG's name.

P. 2.18, Fig. 2-11. Is the next-to-last line ("Global Issues") meant to be a header? It is not in bold font like the others, but it also has no bullets in the columns that follow. If it is not a header, it should at least be shown as an emerging issue.

P. 3.4, Fig. 3-3. Hearings boards should be plural to accurately represent that there are three. They do not appear to be plugged into the flow chart at the proper level, since nothing would go to the GMHBs until and unless first adopted and challenged. Perhaps the relationship could be better represented using this configuration (or something similar):



Model Community
Designated in 2004 by
America's Promise



6000 Main Street SW • Lakewood, WA 98499-5027 • (253) 589-2489 • Fax: (253) 589-3774
www.cityoflakewood.us

C-014-001

Thank you for the notes. The Final EIS includes the edits.

C-014-002

The figure in the FEIS is meant to be illustrative of the GMA planning relationships within the governmental structure in the central Puget Sound region. The Growth Management Hearings Boards and the county play a legal review role.

C-014-001

C-014-002

- C-014-003** | P. 5.1.4, list of Pierce Co. major employers. Ft. Lewis and McChord AFB are soon to become "Joint Base Lewis-McChord," a product of the latest federal round of base closure and realignment actions. Also, the Emerald Queen casino is not a "retail" use. Under NAICS, casinos fall under the "Gambling Industries" (#7132).
- C-014-004** | P. 5.13.4, D., Regulatory Setting. The referenced CTED "model critical areas ordinance" never quite came to fruition. While it was commissioned as such, political controversy resulted in its being backed down as a "model ordinance"; I believe it ended up being "guidelines" or some such thing.
- C-014-005** | **Substantive comments.** P. 2.1, 1st paragraph following preface. "We did not fully understand how the environmental functioned" implies that today we do know. While we certainly know more than we did, we surely still have things to learn about and from natural systems. Suggest substituting something like "We had a different understanding of how the environment functioned..." for this language.
- C-014-006** | P. 2.8, next-to-last bullet; 2.10, last bullet. Might not climate change/global warming also negatively affect the amount of habitable land, including land which is already densely developed in the Puget Sound region? I have recently seen aerials of American coastal cities overlain with the anticipated affects of global warming and associated sea level rise, which puts much of them underwater. This would seem to be an issue as well as snowpack. Additionally, reduced snowpack has implications for aquifer recharge and potable water supply.
- C-014-007** | P. 3.4, last bullet under PSRC's "key responsibilities"; plus paragraph under "Local Comprehensive Plans" beginning at bottom of page and carrying over to p. 3.5. 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.
- C-014-008** | P. 5.0.2, 2nd paragraph. Thank you for acknowledging the growing relationship of regional planning with others including adjacent counties. As a city planning commissioner in Thurston Co., I am noticing an increasing interchange of commuters and shoppers (affecting housing demand and tax revenue), as well as other planning-related matters such as a joint venture recently proposed between the Ports of Tacoma and Olympia.
- C-014-009** | P. 5.1.23, 5.1.4, Potential Mitigation Measures, 2nd set of bullets, 1st bullet. The topic of development of consistent definitions for "affordable" and low-moderate income housing is important. Typically this consists of income threshold, while we find this singular approach does not take into account housing condition; in many cases housing is "affordable" by virtue of its poor condition and/or location. Often, "affordable housing measures" as referenced herein are completely geared to preservation of affordable housing, ignoring whatever negative physical conditions may exist. A new set of more broad definitions and measures is called for, so that

C-014-003

Thank you for the additional information, which has been included in the Final EIS.

C-014-004

Thank you for the note. The Final EIS text has been revised.

C-014-005

The Final EIS text has been revised.

C-014-006

The Final EIS now includes the issue of coastal area flooding.

C-014-007

The FEIS has been updated to reflect this comment.

C-014-008

Comment noted.

C-014-009

VISION 2040's housing policies and narrative discuss the importance of affordable housing. An action calling for a regional strategy has been included in VISION 2040.

- C-014-009** | poor people are not forced to live in squalor because that is the only housing available to them. This is something we struggle with in local-level planning and plan implementation. This also relates to the Housing discussion within the environmental justice chapter (p. 6.24-25).
- C-014-010** | P. 5.2.11, Urban Land, 1st bullet. Infrastructure challenges (particularly to utilities) include balancing the needs of long-established development with aging infrastructure and/or service gaps with the demands of newly developing areas. It is less costly to grow a system with new development paying for extensions, while difficult to fund large capital outlay for renovation of existing systems. This is broached under 5.7.2.2, Impacts to Sanitary Sewer, on p. 5.7.12. However, this is not probed further within analysis or cumulative effects, while at least "expensive retrofitting and expansion" is noted in relation to water systems (p. 5.7.18).
- C-014-011** | P. 5.3.9, Regional Aviation System, Existing System. The four seaplane bases referenced includes American Lake Seaplane Base in Lakewood, which is considered to be a "landing strip" and not a general aviation airport under prior negotiation between the City and WSDOT Aviation Division and interpretation by WSDOT Aviation Division. It remains on pilot charts for the area, but there is no "base" there. In fact, the City's American Lake Park is currently being redeveloped. It will include a dock for seaplanes as "vessels" (equivalent with boats) upon the lake, but all other seaplane services and facilities have been discontinued. Transient air usage of the lake is expected to continue, but not as a formal "airport."
- C-014-012** | P. 5.5.4, Invasive Species (carrying over to p. 5.5.5). There is also a new (2006 Legislature) Invasive Species Council at the state level within IAC, whose charge includes aquatic and terrestrial plant and animal species.
- C-014-013** | P. 5.5.10, Fig. 5-5-5. Does the acreage attributed to Nisqually include the Thurston Co. portion? I'm unclear about reference to UGA in Nisqually where I thought there was none. Also, I am uncertain about the 4,418 acres within UGA shown for Ft. Lewis-McChord. While we do have them within our UGA (as well as Camp Murray), it is the "urban cantonment area" (or, the "urbanized" portion of the bases) and not open space area. Does the High-Priority Conservation Area designation cover the entire base and thus take in the urban cantonment area?
- C-014-014** | P. 5.6.2, Fig. 5-6-1. Consider adding WRIA numbers, not just names, to this figure; or couple the "Supporting Information" beginning on p. 5.6.15 with this figure. This will be more helpful for cross-reference in later discussion (p. 5.6.7) that references the WRIsAs by number.
- C-014-015** | P. 5.7.4, Pierce County. You may wish to include reference to military sewer infrastructure. Also, the "Pierce County Department of Utilities" should be the "Pierce County Sewer Utility" (which is organizationally within the Pierce Co. Public Works & Utilities Dept.).
- C-014-016** | P. 5.7.9, 5.7.1.5, Health and Emergency Medical Services (including hospitals). The "Veteran's Affairs Medical Center" shown for Pierce Co. is typically known as the Hospital at American Lake (or American Lake Hospital). Missing from the list is Western State Hospital (state mental institution run by DSHS). Keep in mind, though, that neither these nor Madigan provides walk-in service to the general public; although Madigan provides trauma care. A planned hospital for Gig Harbor should be coming on-line during within your planning horizon but I do not have details.

C-014-010

The FEIS has been updated to address this issue.

C-014-011

The Draft EIS used the planned transportation system, as defined in Destination 2030, for the analysis of transportation performance. When Destination 2030 is updated, the system maps will be updated.

C-014-012

Thank you for the update, which is noted in the Final EIS.

C-014-013

The areas and the acreage calculations were based on GIS data, which are developed at a regional scale. Some approximation techniques were used to adjust for the different databases used. This included areas for both the developed and undeveloped areas within Fort Lewis, for example. It is correct that Nisqually should not be shown as in the urban growth area, and this is adjusted in the Final EIS.

C-014-014

The graphic did previously have numbers, but was difficult to display legibly. As noted, the accompanying table does provide the information.

C-014-015

The figure was simplified to make it more reader friendly but additional WRIA information can be found within chapter 5.6.

C-014-016

Thank you for the additional information.

- C-014-017** | P. 5.8.12, 5.8.4. Potential Mitigation Measures, last bullet. Because of security and liability concerns, some school districts are backing away from allowing off-hours access to their recreation facilities for community use. This is not necessarily an invalid mitigation measure but it may not be workable.
- C-014-018** | P. 5.11.7, 5.11.5. Significant Unavoidable Adverse Impacts. There appears to be emerging concern among preservationists as to the modernist structures which are now coming into the threshold of historic significance, and large, older, urban churches as has recently been seen in Seattle and Tacoma (also, as noted in Sec. 5.11.2, artifacts of the "roadside culture"). Battles over the preservation of these type of developments are likely to come to the forefront during the planning horizon for this plan.
- C-014-019** | P. 5.13.6. Coal Mine Subsidence. It is my understanding from speaking with staff at Black Diamond that a substantial part of the problem is also a lack of knowledge of where all the old mine shafts are. In some cases, it seems they become known only when a sinkhole appears. This must make it very difficult to know where to target growth in a community where this problem is known to exist.
- C-014-020** | General – Emerging Technologies. We note that PSRC has avoided holding up emerging technological advances as "savior" to any of the issues raised by continuing growth in the region. Generally, this is a sound approach. However, this might bear some recognition at a systemic level. Without necessarily modifying the analysis of impacts or potential mitigation measures, it would be worthwhile to acknowledge increased industry attempts to arrive at alternative fuels and land-based energy sources, hybrid vehicles, personal vehicles, etc. that may, in the long term, considerably reshape infrastructure needs, air quality considerations, energy source demand, etc. For example, widespread replacement of fossil-fuel vehicles with electric vehicles would increase demand for electrical power. In turn, abandonment of fossil-fuel vehicles would likely have a huge impact on solid waste/recycling demand leading into and at phase-out. While these are externalities, depending on how they play out they are likely to have implications for this and other plans, and you might as well set the stage for future actions now. There are small references throughout the document but no wholesale discussion of the issue. Because it is fairly interconnected, it lends itself poorly to the standard topical arrangement of an EIS.
- C-014-021** | General – Environmental Justice. Thank you for your thoughtful exploration of environmental justice implications. Often the environmental documents I review which cover NEPA considerations have a very superficial treatment of environmental justice, when it is sometimes the poorest and most marginalized populations who are most affected. I am pleased that the naysayers at the early public involvement session I attended, who seemed determined to "shout down" this aspect, did not prevail. Please consider how the affordable housing dilemma noted above can be meaningfully probed within this chapter.
- C-014-022** | General – Noise. Please consider expanding the "Airport Noise" and "Mitigation Measures" discussions to include noise associated with McChord AFB aircraft training operations (Ft. Lewis generates aircraft noise, too, but typically over its own land). This would help to support, from the regional plan level, local planning/regulatory measures for noise insulation in the McChord air corridor.

C-014-017
Comment noted.

C-014-018
Thank you for submitting your comment. As Section 5.11.1 states, the Washington State Department of Archaeology and Historic Preservation (DAHP) currently includes modern resources (i.e., less than 50 years) in their inventory of cultural resources. If the resource in question is less than 50 years old, the resource should have documented exceptional significance. This provides a documented method of determining whether or not a modern resource is potentially significant, although it is correct that such inventories or research may not uniformly be conducted throughout the region, increasing the risk that resources could be lost through redevelopment activity. Section 5.11 of the FEIS discusses the concern you have noted, and includes potential mitigation measures.

C-014-019
Comment noted.

C-014-020
The Final EIS includes potential mitigation measures that address alternative technologies, and in addition the policies and the mitigation measures of Destination 2030 are also assumed to be available to help reduce the impacts of growth. The multicounty planning policies also include supporting strategies. However, the FEIS is focused on the decision to adopt a preferred strategy for managing growth. Specific actions to implement the growth alternative, including individual actions by jurisdictions, as well as programs such as those that may be needed to encourage alternative technologies, would be subject to separate planning processes, including environmental review as applicable.

C-014-023

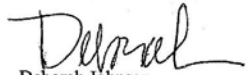
General – Parks & Recreation. Specific park uses appear to be discussed primarily in conjunction with specific alternatives. We are experiencing an increased demand for off-leash dog parks that would seem to be heightened in conjunction with more intensely urbanized areas, now or in the future, anywhere within the region. It is not clear where this might logically be plugged into the discussion or whether you would want to do so, but perhaps it bears mentioning as this particular type of park typically requires a large area exclusive of the typical “acres per population” LOS.

C-014-024

General – Population. We appreciate that PSRC has used specific modeling in developing its assumptions associated with each of the alternatives, the discussion and identification of those tools on p. 3.12, and how analysis might be approached on p. 5.0.3. However, because the planning horizon far exceeds that of the City in performing local planning under the GMA, we have no means of independently evaluating the 2040 population numbers ascribed to Lakewood (all alternatives) in Appendix D-4. The City is unable to comment on whether these numbers are realistic and attainable. The figures shown in the “Future Condition” columns raised concern with at least one of our City Council members at the time PSRC staff made its presentation on the update to our Council. Our Council, as a whole, has taken no official position on the update at this point.

This completes the City's comments. We look forward to continuing to work with you as the VISION 2020 update 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-014-021

On the issue of affordable housing, the Final EIS has responded to comments by increasing the discussion in 5.1, Population, Employment and Housing, and by adding supporting multicounty planning policies for affordable housing.

C-014-022

Noise from aviation is included in the discussion of noise issues in the FEIS, although the FEIS does not attempt to address various noise sources in localized areas, including the military bases. PSRC recognizes that this is an important issue for communities near the bases, but the differences in noise levels would not appreciably alter the effects stated for the alternatives.

C-014-023

This issue is included within the more generalized discussion of the potential for conflicts between different users, as well as increased demands for specific types of uses.

C-014-024

The Final EIS includes revisions and clarifications to the alternatives and the planning process, largely in response to public comments on the Draft EIS and Board direction. This includes changing the level of definition for all alternatives to be at a regional geography level of detail, rather than by individual jurisdiction.

From: Ivan Miller
To: Robin McClelland
Date: 8/7/2006 12:00:50 PM
Subject: Fwd: Late-breaking comment

for the end of the day addition to the packet. -iwm

>>> Norman Abbott 8/7/2006 8:43 AM >>>

>>> "Deborah Johnson" <DJohnson@cityoflakewood.us> 8/4/2006 4:26 PM >>>
Following the brown bag on Wed., I met my best friend for a late lunch. She runs a water-sewer district, and we talked about their district comp plan; and I told her about the discussion and your feedback at the brown bag about utilities coordination. Even though comments were already due I sent her the public services/utills chapter of the DEIS today, and I noticed a small incongruity regarding her district on pp. 5.7.6-8. Skyway W/S Dist. is mentioned in the text at the bottom of p. 5.7.6, Bryn Mawr is shown on the map on p. 5.7.7, and it's Skyway again in the fig. at the top of pg. 5.7.8. Actually, these are 2 small districts (Skyway & Bryn Mawr/Lakeridge) that have merged under the name of Skyway. See <http://www.skywayws.org/>. Besides the name issue, something about the map on p. 5.7.7 doesn't look quite the same as the service area map shown at the bottom of their home page so maybe you'll want to check that.

Have a great weekend!

Deborah Johnson

Senior Planner

Lakewood Community Development Dept.

6000 Main Street SW

Lakewood, WA 98499-5027

Voice: 253.983.7770

Fax: 253.512.2268

C-014-025

This figure is based on an existing source and is intended to show the large number of smaller districts involved in sewer/water provision in the region. Your corrections are noted in the FEIS.

C-014-025



RECEIVED
JUL 31 2006
PUGET SOUND REGIONAL COUNCIL

C-015-001
Thank you.

COMMUNITY DEVELOPMENT DEPT. - CURRENT PLANNING DIV.
July 28, 2006

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

RE: VISION 2020 Update Draft Environmental Impact Statement

Dear Dr. Abbott:

C-015-001

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Update of VISION 2020. The Lynnwood City Council and staff compliment you and your staff on the scope and depth of the analysis in the DEIS. The quality of the document shows the commitment of the PSRC to fully considering the potential impacts of alternative approaches to guiding the growth and development of the Puget Sound region over the next 35 years.

Attached is a copy of Resolution 2006-14 which provides the Lynnwood City Council's comments on the DEIS.

We look forward to the Council's deliberations on a preferred alternative and the publication of the Supplemental EIS. Please continue to send us notices of all public meetings and documents related to this Update.

Sincerely,

CITY OF LYNNWOOD

Kevin Garrett, AICP
Planning Manager

City of Lynnwood, Washington • 19100 44th Ave. W. • PO Box 5008 • Lynnwood, WA 98046-5008 • 425.775.1971 • www.ci.lynnwood.wa.us

City Hall/Council Chambers
19100 44th Ave. W.

Civic Justice Center
19321 44th Ave. W.

Recreation Center
18900 44th Ave. W.

North Admin. Bldg.
19000 44th Ave. W.

Fire Dept. Headquarters
18800 44th Ave. W.

GA:VISION 2020 Final EIS Reso.doc, last saved 7/28/06, 425.774.7035 Court Fax

**CITY OF LYNNWOOD
RESOLUTION 2006-14**

COMMENTING ON THE DRAFT ENVIRONMENTAL IMPACT
STATEMENT FOR THE UPDATE OF THE REGIONAL PLAN
FOR THE PUGET SOUND REGION (VISION 2020+20)

WHEREAS, the Puget Sound Regional Council (PSRC) has initiated a major update of the regional plan for the Puget Sound region, known as VISION 2020+20; and

WHEREAS, PSRC has issued a Draft Environmental Impact Statement (EIS) for this update and has invited public comment on the Draft EIS and regarding a preference among the four growth scenarios discussed in the EIS; and

WHEREAS, the Draft EIS projects that the Puget Sound Region will need to accommodate over 1.6 million new residents and 1.1 million new jobs by 2040, and it describes four alternative scenarios for managing that development; and

WHEREAS, PSRC is to be complemented on the quantity of information in the Draft EIS, as it describes the potential environmental impacts associated with the forecasted amount of growth and development; and

WHEREAS, the City of Lynnwood is designated as a "Regional Growth Center" in the current regional Plan (VISION 2020) and is implementing the Lynnwood City Center Subarea Plan to create a new downtown for Lynnwood, consistent with that designation; and

WHEREAS, the Lynnwood City Council has reviewed the Draft EIS with regard to both the potential effect of each of the growth scenarios on the City of Lynnwood and the Puget Sound region as a whole; and

WHEREAS, Snohomish County Tomorrow, a multi-jurisdictional agency representing all the cities, towns tribes and county in Snohomish County, has thoroughly researched, discussed and publicly commented on PSRC's VISION 2020+20 Draft EIS.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF LYNNWOOD RESOLVES AS FOLLOWS:

- C-015-002** | 1. The City Council of the City of Lynnwood concurs with the comments of Snohomish County Tomorrow with regard to PSRC's VISION 2020+20 Draft EIS as written in SCT's letter of July 14 to Dr. Norman Abbot, Director of Growth Management Planning, Puget Sound Regional Council.
2. The Lynnwood City Council makes the following comments on the Draft EIS:
- C-015-003** | A. While understanding the environmental impacts of alternative growth scenarios is important for deciding which scenario (or combination of scenario components) will guide growth and development of the Puget Sound region, such information alone is not sufficient for making this decision. The PSRC should also prepare an "economic impact

C-015-002

Comment noted.

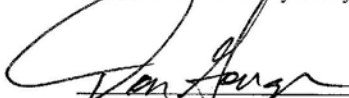
C-015-003

As was done in VISION 2020, fiscal analysis was completed at a scale and level of detail appropriate for this regional visioning process, including the Public Services chapter, Cost of Sprawl Issue Paper, etc. Also, a Fiscal Impact sidebar was added to VISION 2040.

Note that VISION 2040 represents regional guidance rather than a local or comprehensive plan level of analysis. 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 an appropriately broad programmatic scale.

- C-015-003** report" that would analyze the impacts of the scenarios on the economic competitiveness and sustainability of the region and other economic effects.
- C-015-004** B. More analysis needs to be done on the impact in Core Suburban Cities each of the four alternatives would have on the price and availability of attainable housing, including new and existing single-family homes, and the impact on the supply of affordable commercial land for small or start-up businesses;
- C-015-005** C. None of the four alternatives in the Draft EIS seem to take into account the largely urbanized state of SW Snohomish County's unincorporated areas. More analysis of the impacts of the different alternatives on cities as they annex and begin to provide services to these areas is needed.
- C-015-006**
- C-015-007** D. From the work to date on the Lynnwood City Center Access Study, it is apparent that I-5 between 128th Street SW and 220th Street SW is currently operating at or beyond capacity. Future growth in population and employment at current projected growth rates or all of the alternative growth scenarios will continue to overload the regional transportation system and exacerbate this situation. While accepting jobs and growth in this region is unavoidable, the issues associated with the movement of people, goods and services should be addressed to higher degree in the Vision 2020+20 document and analysis. For example, will Sound Transit Phase 2 and/or 3 fully and completely address the projected growth? Will additional capacity be added, somehow, to current regional transportation system? How will these improvements be funded?
- C-015-008** 3. The Lynnwood City Council recommends that any PSRC growth alternative includes promoting a balance between jobs and housing in cities throughout the region so that: A) commuting to work is minimized; and B) all cities have the economic activity and resources that provides both employment and incomes that support a family and public revenues that support adequate public services.

RESOLVED this 24th day of July, 2006.

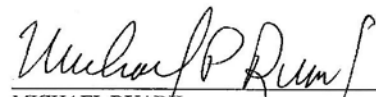

DON GOUGH
MAYOR


LOREN SIMMONDS
COUNCIL PRESIDENT

ATTEST:


PATRICK DUGAN
Interim Finance Director

APPROVED AS TO FORM:


MICHAEL RUARK
City Attorney

C-015-004

PSRC recognizes the importance of having attainable levels of affordable housing and affordable properties to support businesses. However, given the wide variety of factors and conditions that affect the cost of residential or commercial properties throughout the region, a more detailed analysis of the comparative differences in affordability by urban geography for each alternative is beyond the scope of the environmental review needed to support a decision for a Preferred Growth Alternative. As the Draft EIS noted in its qualitative assessment of impacts, higher growth pressures would bring higher concerns for affordable housing and for other affordable lands. As discussed in the Final EIS, this has allowed PSRC to identify policies and other mitigation measures to address the potential impacts. Also, see VISION 2040 policies and actions related to housing.

C-015-005

See C-015-003 regarding the scale of the alternatives and analysis.

C-015-006

The analysis of the alternatives being considered recognizes that annexation will take place. Chapter 5.2, Land Use, discusses annexation activities, as does Chapter 5.7. However, the level of definition for alternatives has been adjusted to a regional geography level, and does not include specific assignments of growth to individual cities or unincorporated areas. The analysis of public services impacts in the FEIS describes the types of issues that would be expected as growth intensifies, including for cities that may annex areas, but more detailed analysis of impacts to specific areas or cities would require a different level of definition for the alternatives.

C-015-007

Given the large regional scale of the project and the broad nature of the

decisions to be made balancing a wide range of environmental and public policy factors, more detailed analysis of transportation impacts was considered to be beyond the scope of what was needed to make the decision on adopting VISION 2040.

While the Final EIS does not attempt to determine detailed impacts, improvements, and funding for a specific facility or system, the analysis was sufficient to determine the types of impacts and their comparative magnitude among the alternatives. After VISION 2040 and the Preferred Growth Alternative are adopted, PSRC will update Destination 2030 to align it with VISION 2040.

C-015-008

VISION addresses these issues, with policies and narrative on job-housing balance and family-wage jobs.



May 31, 2006

Mr. Norman Abbott
SEPA Responsible Official
VISION 2020 Update
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

RE: VISION 2020 Update and DEIS Comments

Dear Mr. Abbott:

I wanted to thank the PSRC staff for attending the Snohomish County Planning Director's meeting to provide a briefing and population estimates related to the four alternatives under consideration. This was very helpful in evaluating both population and employment expectations compared to our 2005 Mukilteo Comprehensive Plan with respect to the Draft Environmental Impact Statement.

C-016-001 For modeling purposes the City of Mukilteo the population range shown for Alternatives 1- 4 is 4,500 to 27,300 (See Attachment 1, pages 1 & 6). When this is added to the 2000 census population of 18,019 the projected population for Mukilteo ranges from 22,500 to 45,319. A more accurate number for alternatives 1- 4 would be less than 4,000 in population with no range. The city undertook an extensive buildable lands analysis as part of the Snohomish County process to prepare for the 10 - year comprehensive plan updates. The buildout population was projected at 22,000 (See Attachment 2, pages 19). The City has rezoned surplus industrial land where it made sense and the remaining industrial and residential land is being developed now or will be over the next several years. There is **no** opportunity to rezone residential property for higher density. Thus, the assumption that the city can take 4,500 to 27,300 more in population is erroneous and appears to be based upon past growth rates. This modeling assumption does not work for the City of Mukilteo nor other communities that are reaching buildout before 2020. I would ask that the PSRC staff find a way to cap population growth where cities have already used their available land supply. In addition, there is no consideration of airport compatibility and the constraints that this has upon land uses for communities adjacent to airports. The City of Mukilteo removed the mixed-use overlay that allowed for more residential population in 1997 in order to more fully comply with the airport compatibility requirements. (See Attachment 2, pages 16 & 18).

C-016-002

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C-016-001

The Final EIS includes revisions and clarifications to the alternatives and the planning process, largely in response to public comments on the Draft EIS and Board direction. This includes changing the level of definition for all alternatives to be at a regional geography level of detail, rather than by individual jurisdiction.

C-016-002

As a plan level or programmatic environmental document, the FEIS does not attempt to identify impacts to specific locations or facilities, but instead describes the likely level of impacts that typical facilities or resources may encounter. This is in keeping with the broad and conceptual nature of the growth alternatives themselves. Also, see answer to Comment #1.

- C-016-003** I am also concerned that the City of Mukilteo is noted under "large suburban cities" when cities similar to Mukilteo are classified under "smaller suburban cities" or not noted (See Attachment 1 & 3). Even with annexation the City of Mukilteo will only be a medium suburban city even with employment added to the number. It appears that more consistency is needed in placing cities under categories. I have attached an analysis of other Snohomish County cities that shows the inconsistency and also proposes a small, medium and large suburban city classification (Attachment 4).
- C-016-004** In addition, all four alternatives have a circle that is either at Paine Field or at southern Mukilteo denoting a concentration of population. With no explanation of these circles it is hard to interpret what is intended by this and I am concerned that there is very little variation between the alternatives on the size of the circles. Comparing the circle size with Marysville, I would think that there would be a difference since Marysville with annexation will be over 100,000 in population while Mukilteo even with annexation, which has not yet been decided upon, would be 36,500, less than half the size of Marysville (Attachment 4). So there appears to be a false picture of population and employment concentrations.
- C-016-005** I am also concerned that the update is not based upon land use information derived from local agencies provided through the counties. I realize that the PSRC has made every effort to develop a new land use based model, and that it is not yet available. Because of this I would like to have the agency take a cautious approach and spend more time at refining an alternative that will work for the region that takes into consideration local concerns and realities. A good start would be to take the work just recently completed by the counties and cities out to 2025 and then determine through an interactive process where additional population can be added. We would prefer a bottom up approach for the remainder of the process. The Snohomish County Planning Director meetings provide an excellent forum to work with us on these issues.

Please contact me if you have any questions related to these comments.

Sincerely,



Heather McCartney, FAICP
Planning Director
City of Mukilteo
4480 Chennault Beach Road
Mukilteo, WA 98275
(425) 355-4141, ex 226
hmccartney@ci.mukilteo.wa.us

Attachments

pc: Rich Leahy, City Administrator
SCT – PAC/Planning Directors
Correspondence file
Plan File

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C-016-003

VISION 2040 regional geographies are defined only by population and employment thresholds. Local differences will be considered by the localities as they work together to establish targets in the countywide process. This approach incorporates local perspectives and choices while providing a unifying regional message. Regional geographies in the regional growth strategy help VISION 2040 to be more specific, measurable, and clear. While the regional geography numbers are important, the percentage will be used more often.

C-016-004

The map noted is illustrative of the conceptual growth distribution under that alternative. For a more complete map of centers, see VISION 2040 development patterns section.

C-016-005

The Preferred Growth Alternative builds upon local plans and was developed with the help of a group of local government technical planning staff. Further, implementation of the PGA will be accomplished through local plans, which provides the opportunity to ensure that the regional VISION is implemented in a manner responsive to local situations.

**VISION 2020 Update DEIS Alternatives
Population and Employment Distribution
by County, Regional Geography, Local Jurisdiction**

Population

Regional Geography	Jurisdiction	Base Year (2000)	Alternatives 1 - 4 Population Growth Range
	SNOHOMISH COUNTY	606,024	287,300 - 467,700
Metropolitan Cities (1)	Everett	91,488	17,000 - 67,800
Core Suburban Cities (2)	Bothell	30,150	9,700 - 29,000
	Lynnwood	33,647	8,800 - 26,300
Large Suburban Cities (4)	Edmonds	39,544	9,300 - 55,700
	Marysville	25,315	8,200 - 49,300
	Mountlake Terrace	20,362	4,600 - 27,800
	Mukilteo	18,019	4,500 - 27,300
Smaller Suburban Cities (13)	Arlington	11,927	3,700 - 22,400
	Brier	6,383	1,700 - 10,000
	Lake Stevens	6,361	1,800 - 10,800
	Mill Creek	11,525	3,500 - 20,700
	Woodway	936	300 - 1,700
	Darrington	1,136	500 - 2,900
	Gold Bar	2,014	700 - 4,300
	Granite Falls	2,347	1,200 - 7,100
	Index	157	60 - 300
	Monroe	13,795	5,100 - 30,600
	Snohomish	8,494	2,500 - 14,900
	Stanwood	3,923	1,400 - 8,400
	Sultan	3,344	2,000 - 12,200
Unincorporated UGA		176,083	30,300 - 212,000
Rural Area		115,059	25,900 - 103,400

Note: VISION 2020 Update DEIS alternatives were defined at the regional geography level only. These growth ranges at the city and county levels were used as technical inputs for the four alternatives analyzed in the DEIS. County and city growth ranges are illustrative only, and not growth forecasts or proposed growth targets.

**VISION 2020 Update DEIS Alternatives
Population and Employment Distribution
by County, Regional Geography, Local Jurisdiction**

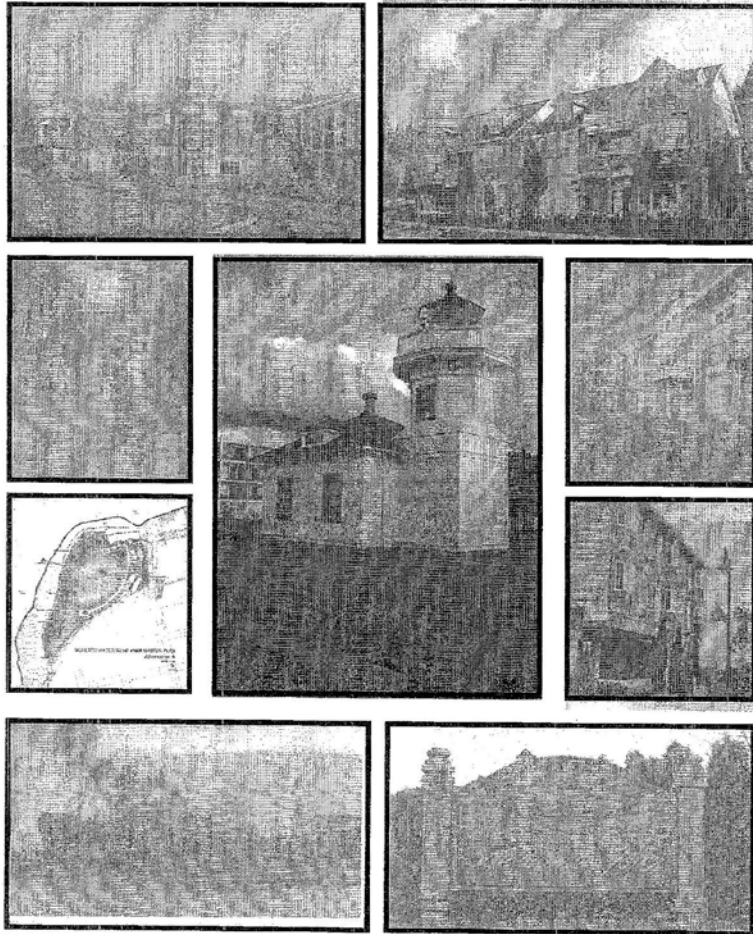
Employment

Regional Geography	Jurisdiction	Base Year (2000)	Alternatives 1 - 4 Employment Growth Range
	SNOHOMISH COUNTY	231,620	164,600 - 301,000
Metropolitan Cities (1)	Everett	79,552	13,100 - 78,600
Core Suburban Cities (2)	Bothell	22,757	5,200 - 15,500
	Lynnwood	25,670	5,500 - 16,600
Large Suburban Cities (4)	Edmonds	11,440	4,100 - 28,300
	Marysville	9,578	4,600 - 27,600
	Mountlake Terrace	7,320	3,000 - 18,800
	Mukilteo	7,602	3,600 - 21,300
Smaller Suburban Cities (13)	Arlington	9,472	4,700 - 27,900
	Brier	430	100 - 900
	Lake Stevens	1,130	600 - 3,400
	Mill Creek	3,257	1,500 - 8,800
	Woodway	72	0 - 200
	Darrington	620	0 - 1,100
	Gold Bar	159	100 - 500
	Granite Falls	854	800 - 4,800
	Index	48	0 - 200
	Monroe	7,595	4,700 - 28,100
	Snohomish	4,476	1,800 - 12,300
	Stanwood	2,599	1,900 - 11,200
	Sultan	845	1,100 - 6,900
Unincorporated UGA		35,028	19,000 - 133,100
Rural Area		12,600	8,300 - 24,300

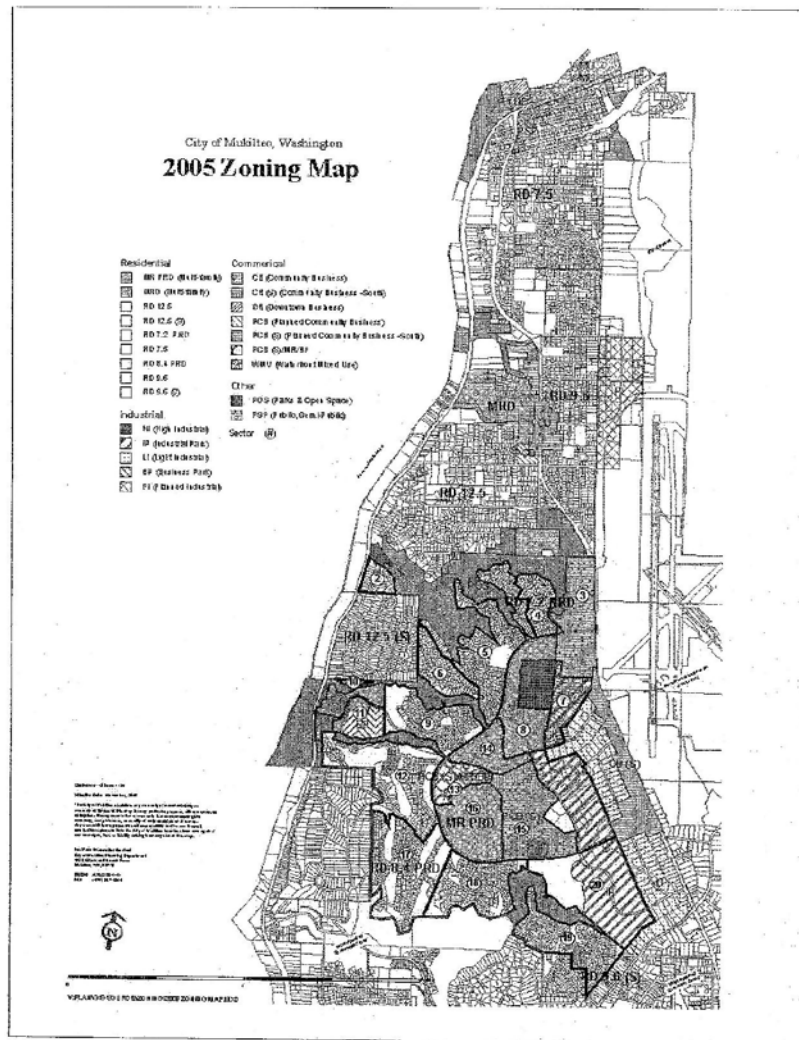
Note: VISION 2020 Update DEIS alternatives were defined at the regional geography level only. Those growth ranges at the city and county levels were used as technical inputs for the four alternatives analyzed in the DEIS. County and city growth ranges are illustrative only, and not growth forecasts or proposed growth targets.

City of Mukilteo, Washington
2005 Comprehensive Plan

City Council Approved November 7, 2005



Map 3: 2005 Zoning Map



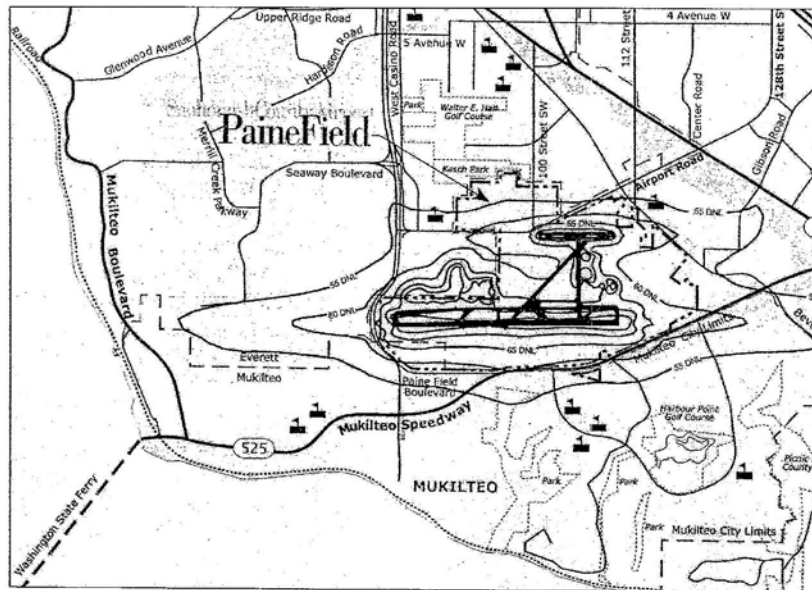
LU12: Ensure that all new development occurs in a manner consistent with all elements of the Comprehensive Plan, including capital facilities.

LU13: New development shall not reduce existing levels of service or create inequitable financial burdens on existing users.

LU14: All development shall occur only in areas with adequate public utilities and services including but not limited to water, sewer, storm drainage collection and disposal, solid waste disposal, police and fire protection, or areas into which such utilities and services can be readily extended at no cost to the City or existing users.

Map 4: Future Noise Exposure—Year 2008

(Paine Field Master Plan)

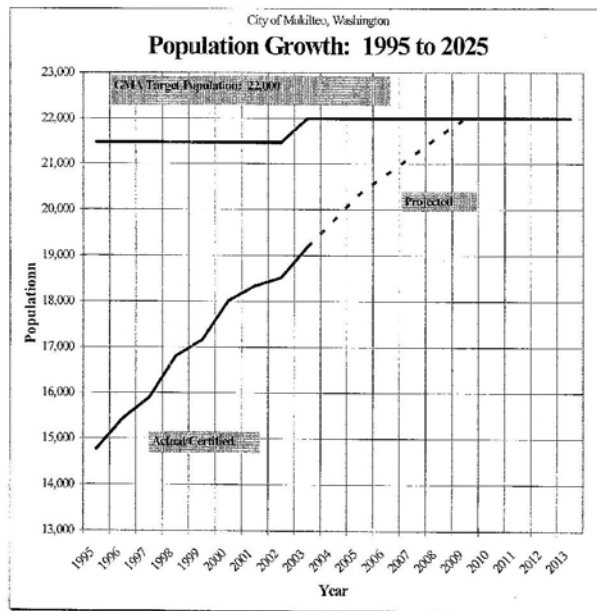


Note: This map has been provided by Paine Field Airport staff. It appears in the City of Mukilteo Comprehensive Plan to provide general information regarding noise levels. Noise levels 65 DNL and above are defined by FAA as incompatible for residential land uses. The City of Mukilteo's Comprehensive Plan limits residential land uses within the 60 DNL contour to provide compatibility, but the City as a whole is affected by airport noise. Source: Part 150, Paine Field Airport.

Demographics

The 2000 Census placed Mukilteo's total population at 18,019. That figure represents a 48% increase over the 1991 post-Harbour Pointe annexation calculated population of 12,965. The Washington State Office of Financial Management (OFM) performs annual population calculations with the help of Washington municipalities. Mukilteo's 2004 OFM population calculation is 19,220, for an average annual growth rate of 3.7% since 1991. Approximately 250 single-family residential lots have been created or are in the subdivision process for 2004 and 2005. With houses already under construction on many of those lots, combined with a 19-unit duplex project on SR525 and the 103-unit Village Center Townhomes under construction and two approved preliminary plats totaling 121 lots under site development, it is expected Mukilteo's population will grow significantly in the next 1-3 years as those units are completed and occupied. It is likely the City's population will surpass 20,000 in 2006, with the GMA target population, or buildout, reached in 2010.

Chart 2: Population Growth



DRAFT April 13, 2006 Recommendation to PAC on Reconciled CPP 2025 Population Targets								
Area	2002 Estimated Population	Initial CPP 2025 Population Targets	County Adopted 2025 Population Targets	City Adopted 2025 Population Targets	Reconciled CPP 2025 Population Targets	Difference: Reconciled - County Adopted	2002-25 Reconciled Change No.	2002-25 Reconciled Change Pct.
Non-S.W. County UGA	134,101	208,324	227,165		228,794	(371)	92,593	68.1%
Arlington UGA	13,920	20,720	24,320	30,538	27,000	2,680	13,080	94.0%
Arlington City	13,280	17,360	17,360		18,150	790	4,870	
Unincorporated	640	3,360	6,960		8,850	1,800	8,210	
Darrington UGA	1,468	2,125	2,125	2,125	2,125	-	657	44.8%
Darrington Town	1,335	1,910	1,910		1,910	-	575	
Unincorporated	133	215	215		215	-	82	
Gold Bar UGA	2,817	4,000	3,500	5,000	3,500	-	683	24.2%
Gold Bar City	2,055	2,897	2,497		2,497	-	442	
Unincorporated	762	1,103	1,003		1,003	-	241	
Granite Falls UGA	2,909	6,970	6,100	6,970	6,970	870	4,061	139.6%
Granite Falls City	2,760	4,770	4,770		4,770	-	2,010	
Unincorporated	149	2,200	1,330		2,200	870	2,051	
Index UGA (incorporated)	180	190	190	190	190	-	30	18.8%
Lake Stevens UGA	26,828	40,125	46,125		46,125	-	19,297	71.9%
Lake Stevens City	6,640	8,360	8,360	8,360	8,360	-	1,720	
Unincorporated	20,188	31,765	37,765		37,765	-	17,577	
Malibu UGA (unincorporated)	NA	NA	NA	NA	NA	NA	NA	NA
Marysville UGA	50,828	73,110	83,500	79,800	79,800	(3,700)	28,972	57.0%
Marysville City	27,580	39,720	39,720		36,737	(2,983)	9,157	
Unincorporated	23,248	33,400	43,780		43,063	(717)	19,815	
Monroe UGA	16,240	26,500	26,500	26,590	26,590	-	10,350	63.7%
Monroe City	14,670	20,540	20,540		20,540	-	5,870	
Unincorporated	1,570	6,060	6,060		6,050	-	4,480	
Snohomish UGA	10,194	14,535	14,535	14,535	14,535	-	4,341	42.6%
Snohomish City	8,575	9,981	9,981		9,981	-	1,406	
Unincorporated	1,619	4,554	4,554		4,554	-	2,935	
Starwood UGA	4,479	8,840	9,340	8,840	8,840	(500)	4,361	97.4%
Starwood City	4,085	5,650	5,650		5,650	-	1,565	
Unincorporated	394	3,190	3,690		3,190	(500)	2,795	
Sultan UGA	4,258	11,119	10,840	11,119	11,119	279	8,861	161.1%
Sultan City	3,910	8,190	8,190		8,190	(0)	4,280	
Unincorporated	348	2,929	2,650		2,929	279	2,581	
S.W. County UGA	380,579	523,800	527,271		532,543	5,272	151,964	39.9%
Incorporated S.W.	242,490	297,955	297,955		303,227	5,272	60,737	25.0%
Bothell City (part)	14,490	22,000	22,000	22,000	22,000	-	7,510	51.8%
Brier City	6,445	7,790	7,790		7,790	-	1,345	20.9%
Edmonds City	39,469	44,880	44,880	44,880	44,880	-	5,420	13.7%
Everett City	96,070	123,060	123,060		123,060	-	26,990	28.1%
Lynnwood City	33,990	38,510	38,510	38,510	43,782	5,272	9,792	28.8%
Mt. Creek City	12,055	16,089	16,089		16,089	-	4,034	33.5%
Mt. Lake Terrace City	20,470	22,456	22,456	22,456	22,456	-	1,986	9.7%
Mukilteo City	18,520	22,000	22,000	22,000	22,000	-	3,480	18.8%
Woodway Town	990	1,170	1,170	1,170	1,170	-	180	18.2%
Unincorporated S.W.	138,089	225,845	229,316		229,316	-	91,227	66.1%
UGA Total	514,680	732,124	754,436		759,337	4,901	244,657	47.5%
City Total	327,540	417,523	417,123		420,202	3,079	92,662	28.3%
Unincorporated UGA Total	187,140	314,601	337,313		339,135	1,822	151,995	81.2%
FCC Population Reserve	NA	15,000	15,000		15,000	-	NA	NA
TDR Population Reserve	NA	NA	4,900		4,900	-	NA	NA
Potential UGA total	514,680	747,124	774,336		779,237	4,901	284,557	51.4%
Non-UGA Total (Rural Unincorporated)	113,320	167,115	158,615		158,615	-	45,295	40.0%
County Total	628,000	914,239	932,951		937,852	4,901	309,852	49.3%

FCC = Fully Contained Community; TDR = Transfer of Development Rights; NA = Not applicable.

DRAFT April 13, 2006 Recommendation to PAC on Reconciled CPP 2025 Employment Targets								
Area	2002 Estimated Employment	Initial CPP 2025 Employment Targets	County Adopted 2025 Employment Targets	City Adopted 2025 Employment Targets	Reconciled CPP 2025 Employment Targets	Difference: Reconciled - County Adopted	2002-25 Reconciled Change No.	2002-25 Reconciled Change Pct.
Non-S.W. County UGA	43,105	73,181	74,805		80,628	5,823	37,523	87.1%
Arlington UGA	8,103	14,730	15,360	14,800	15,360	-	7,257	89.5%
Arlington City	7,928	14,350	14,350		14,350	-	6,422	
Unincorporated	175	380	1,010		1,010	-	835	
Darrington UGA	371	535	535	535	535	-	164	44.2%
Darrington Town	371	415	415		415	-	44	
Unincorporated	-	115	115		115	-	115	
Gold Bar UGA	175	210	210	210	210	-	35	20.2%
Gold Bar City	172	210	210		210	-	38	
Unincorporated	2	-	-		-	-	(2)	
Granite Falls UGA	802	2,200	2,200	2,100	2,200	-	1,398	174.2%
Granite Falls City	802	2,109	2,109		2,109	(0)	1,307	
Unincorporated	-	91	91		91	0	91	
Index UGA (incorporated)	44	70	70	70	70	-	26	57.9%
Lake Stevens UGA	3,799	6,550	6,615		6,615	-	2,816	74.1%
Lake Stevens City	1,164	1,805	1,805	1,805	1,805	-	641	
Unincorporated	2,636	4,745	4,810		4,810	-	2,174	
Maltby UGA (unincorporated)	2,107	3,745	4,960		4,960	-	2,853	135.4%
Marysville UGA	11,292	17,230	19,285	25,000	24,008	4,723	12,716	112.6%
Marysville City	9,369	12,260	12,260		15,851	4,591	7,482	
Unincorporated	1,923	4,970	7,025		7,157	132	5,234	
Monroe UGA	7,627	12,390	12,390	12,390	12,390	-	4,763	62.4%
Monroe City	7,506	11,800	11,800		11,800	-	4,294	
Unincorporated	121	590	590		590	-	469	
Snohomish UGA	4,842	6,410	6,410	6,730	6,730	320	1,888	39.0%
Snohomish City	4,015	4,900	4,900		4,900	-	885	
Unincorporated	827	1,510	1,510		1,830	320	1,003	
Stanwood UGA	3,081	5,550	5,550	5,550	5,550	-	2,469	80.2%
Stanwood City	2,856	4,790	4,790		4,790	-	1,934	
Unincorporated	225	760	760		760	-	535	
Sultan UGA	860	3,561	1,220	3,561	2,000	780	1,140	132.5%
Sultan City	843	3,119	1,190		1,970	780	1,127	
Unincorporated	18	442	30		30	-	12	
S.W. County UGA	163,204	250,863	252,377		259,577	7,200	96,373	59.1%
Incorporated S.W.	142,477	212,273	212,273		219,473	7,200	76,996	54.0%
Bothell City (part)	11,247	15,840	15,840	15,840	15,840	-	4,593	40.8%
Brier City	300	430	430		430	-	130	43.4%
Edmonds City	10,300	12,190	12,190	12,190	12,190	-	1,890	18.3%
Everett City	80,493	130,340	130,340	130,340	130,340	-	49,847	61.9%
Lynnwood City	22,876	31,350	31,350	31,350	39,550	7,200	15,674	68.5%
Mill Creek City	2,890	4,544	4,544		4,544	-	1,654	57.2%
Mtlake Terrace City	7,869	8,039	8,039	8,039	8,039	-	170	2.2%
Mukilteo City	6,449	9,450	9,450	9,450	9,450	-	3,001	46.5%
Woodway Town	53	90	90	90	90	-	37	69.3%
Unincorporated S.W.	20,727	38,590	40,104		40,104	-	19,377	93.5%
UGA Total	206,309	324,044	327,182		340,205	13,023	133,896	64.9%
City Total	177,548	268,101	266,172		278,743	12,571	101,195	57.0%
Unincorporated UGA Total	28,761	55,943	61,010		61,462	452	32,701	113.7%
Non-UGA Total (Rural Unincorporated)	7,566	18,150	18,150		18,150	-	10,584	139.9%
County Total	213,875	342,194	345,332		358,355	13,023	144,480	67.8%

Includes all full- and part-time wage and salary workers and self-employed persons, excluding jobs within the resource (agriculture, forestry, fishing and mining) and construction sectors. Non-UGA total includes employment forecast information provided by Tulalip Tribes to the year 2020, extrapolated by to 2025 by Snohomish County Tomorrow. Assumes a total of 12,300 jobs on Tulalip Reservation by 2025 (up from 2,680 total jobs in 2000).

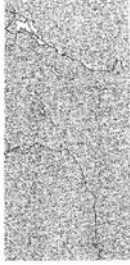
Attachment 4: Snohomish County 2025 Reconciled Population & Employment – Size Categories May 2006

City	2000 Population	2025 City & UGA Population	2025 Employment	Combined Pop & Employment	PSRC Size Classification	Proposed Classification
Arlington	18,150	27,000	15,360	42,360		Medium
Lake Stevens	8,360	46,125	6,615	52,740		Large
Marysville	36,737	79,800	24,008	103,803	Large	Large
Monroe	20,540	26,590	12,390	38,980	Small	Medium
Bothell(Sno Co Portion)	14,490	22,000	15,840	37,840		Large
Edmonds	39,460	44,880	12,190	57,070	Large	Large
Mill Creek	12,055	16,089	4,544	20,633	Small	Small
Montlake Terrace	20,470	22,456	8,039	30,495	Large	Medium
Mukilteo	18,520	22,000	9,450	31,450	Large	Medium

Small City = < 22,500 Population and Employment

Medium City = 22,500 – 45,000

Large City = > 45,001

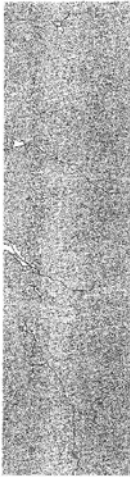


of growth on the urban fringe.

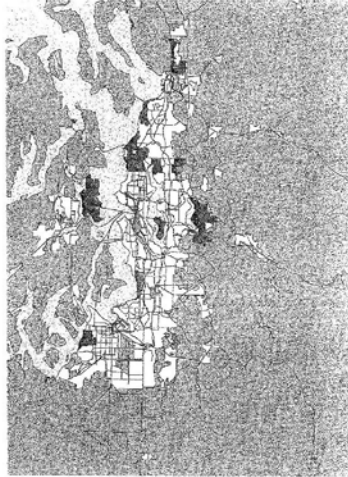
The INDEX tool showed that, in general, scenarios with greater population and employment concentration have benefits such as reduced amounts of vehicle miles traveled, and correspondingly fewer air pollutants. These scenarios demonstrated more convenient transportation choices for residents, resulting from larger percentages of housing and employment within comfortable walking distance of planned transit routes and facilities. Population and employment growth was more aligned with key existing and planned hubs in transportation network, and there was more support for regional and local centers.

Through review and evaluation of all eight scenarios, the Growth Management Policy Board and a committee of senior staff from around the region carried core concepts forward into the four regional growth alternatives for further analysis.

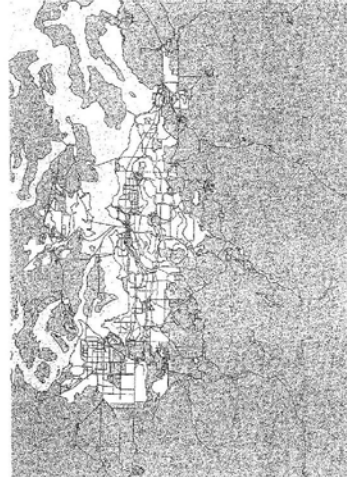
1 suburban cities containing Growth Centers serve as a large multimodal transportation hub, Kirtland, Lake, SeaTac, Silverdale, Tukwila.



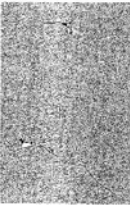
Larger Suburban Cities — The region's larger inner-ring suburban cities with combined population and employment over 22,500. Many of these cities contain important local and regional transit stations, ferry terminals, park and ride facilities, and other transportation connections. Bainbridge Island, Des Moines, Edmonds, Inaqua, Kenmore, Marysville, Mercer Island, Mountlake Terrace, Mukilteo, Sammamish, Shoreline, University Place, Woodinville.



Smaller Suburban Cities — The region's smaller cities and towns, divided into three sub-categories. In the Alternatives, Type A cities will receive a larger share of the geographic class allocation of population and employment growth than Types B and C. **Type A** — Smaller Cities and Towns (inside Contiguous UGA). Algonia, Arlington, Black Diamond, Bonney Lake, Brier, Covington, Du Pont, Edgewood, Fife, Fircrest, Gig Harbor, Lake Forest Park, Lake Stevens, Maple Valley, Medina, Mill Creek, Milton, Newcastle, Normandy Park, Orting, Pacific, Port Orchard, Poulsbo, Ruston, Steelacoom, Sumner. **Type B** — Small Residential Towns (inside Contiguous UGA). Bonney Arns, Clyde Hill, Hunts Point, Woodway, Yarrow Point. **Type C** — Free-Standing Cities and Towns. Buckley, Carbonado, Carnation, Duvall, Everett, Everett, Everett, Gold Bar, Granite Falls, Index, Monroe, North Bend, Roy, Snyhomish, Snohomish, Snoqualmie, South Prairie, Stanwood, Sulaco, Wilkeson.



as — Areas within designated cities and towns, incorporated UGAs.



Rural Areas — Lands outside of urban growth areas not designated as resource areas under the Growth Management Act. King, Kitsap, Pierce, and Snohomish County rural areas.



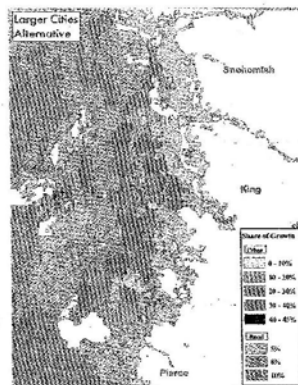
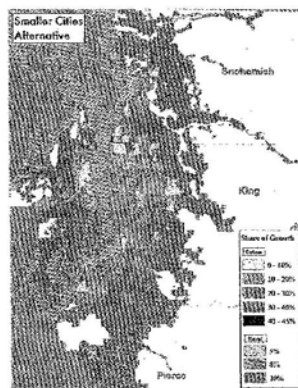
Resource Areas — Lands designated as agriculture, forest, shoreline and mineral resource areas under the Growth Management Act. King, Kitsap, Pierce, and Snohomish County designated resource areas. (Note: The Alternatives did not place additional population and employment in designated resource areas.)



Larger Cities Alternative

This alternative assumes suburban cities in the region would accommodate the bulk of future population and employment growth. Suburban cities with designated regional growth centers and other larger suburban cities could be the primary locations for new development.

Considerable redevelopment could occur in current town center and neighborhood shopping areas, and suburban cities could become major job centers. Many new apartments, condominiums and townhouses could also be built in these areas. Less growth could occur in the downtown areas of the region's largest cities, unincorporated urban areas, and rural areas than is currently planned.



Smaller Cities Alternative

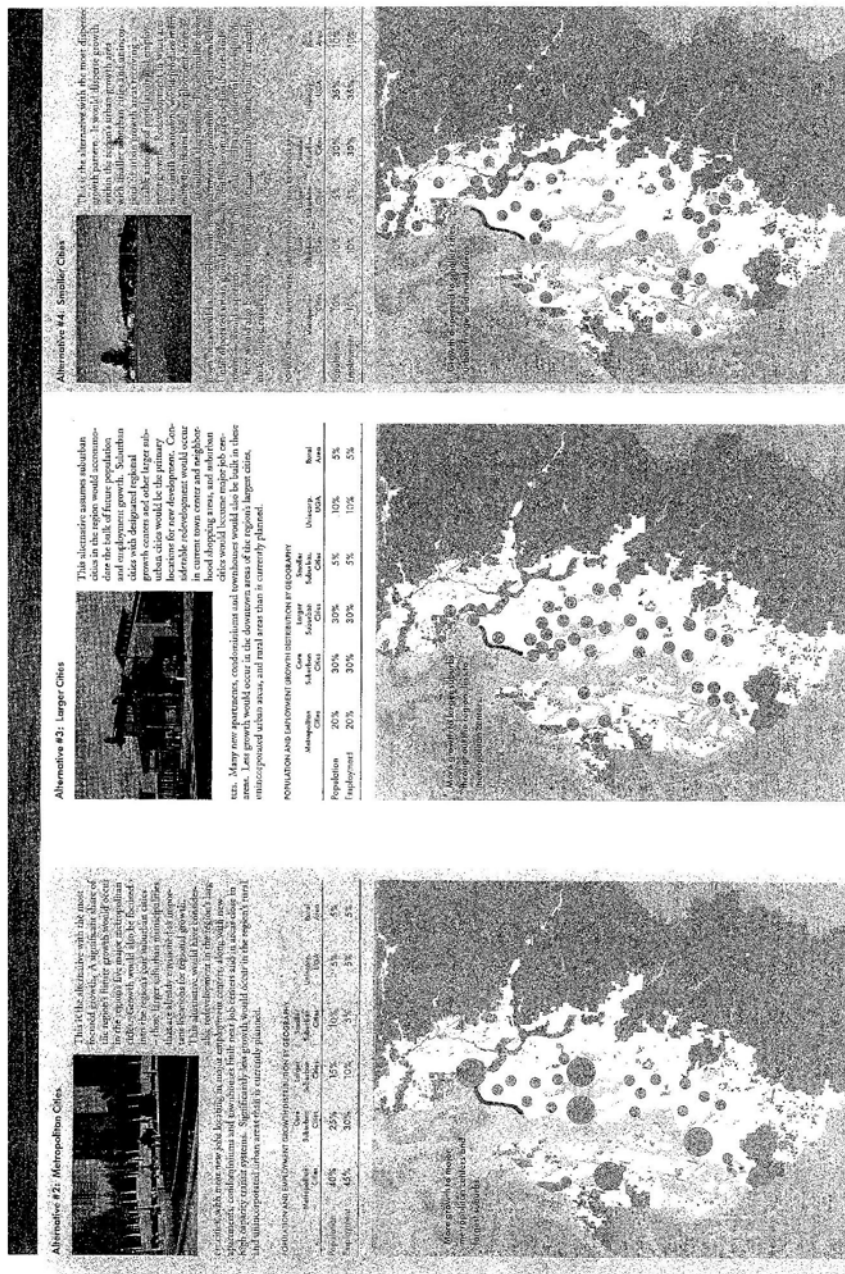
This alternative has the most dispersed regional growth pattern. It would disperse growth within the region's urban growth area — with smaller and freestanding suburban cities and the unincorporated urban growth areas receiving a sizable amount of population and employment growth.

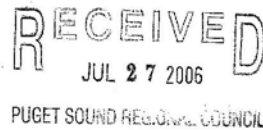
Redevelopment in what are now small downtowns could produce many more significant local employment centers throughout the region. These smaller downtown areas could also develop with new apartments, condominiums and townhouses. Unincorporated urban growth areas — currently the outskirts of small cities and towns — could experience high amounts of new commercial and residential development. There could also be a high amount of single-family housing built in currently undeveloped rural areas.

REGIONAL GROWTH ALTERNATIVES COMPARISON
SHARE OF POPULATION AND EMPLOYMENT GROWTH, BY REGIONAL GEOGRAPHY (2000 TO 2040)

2000-2040 Growth Allocations		Metropolitan Cities	Core Suburban Cities	Larger Suburban Cities	Smaller Suburban Cities	Unincorp. UGA	Rural Areas	TOTAL
Growth	Population	20%	30%	9%	10%	12%	1%	100%
Targets	Employment	25%	28%	7%	9%	8%	2%	100%
Extended Alternative	Population	250,000	312,000	80,000	109,000	96,000	41,000	1,219,000
Metropolitan Cities	Population	10%	15%	15%	10%	5%	5%	100%
Alternative	Employment	12%	10%	10%	5%	5%	5%	100%
	Population	171,000	171,000	86,000	171,000	86,000	86,000	1,712,000
Larger Cities	Population	20%	30%	9%	10%	12%	1%	100%
Alternative	Employment	25%	28%	7%	9%	8%	2%	100%
	Population	244,000	312,000	80,000	109,000	96,000	41,000	1,219,000
Smaller Cities	Population	10%	10%	5%	10%	5%	10%	100%
Alternative	Employment	10%	10%	5%	10%	5%	10%	100%
	Population	171,000	171,000	86,000	171,000	86,000	86,000	1,712,000
	Employment	122,000	122,000	61,000	122,000	61,000	61,000	1,219,000

Notes: Totals may vary due to rounding. The percentages represent what was adopted by PSRC's Growth Management Policy Board adopted in September 2005. For each alternative, the shaded areas represent the geographies of focus. Please see the footnote on page 3 of the Executive Summary for more information on the total growth figures.





July 26, 2006

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

Re: **Vision 2020 Update Draft EIS**

Dear Mr. Abbott:

Thank you for the opportunity to comment on the Vision 2020 +20 Draft Environmental Impact Statement.

C-017-001 The City of Newcastle appreciates PSRC's efforts to initiate a conversation about how the region should grow in the future. However, we believe that the regional growth strategy we have been pursuing since the Growth Management Act (GMA) was passed is largely working well, and that there is no need to impose a drastically different strategy. Therefore, we prefer the *No Action Alternative*.

We believe the *No Action Alternative* gives cities the maximum flexibility to develop in a manner consistent with their current comprehensive plans and zoning codes, which have been crafted over many years in coordination with their residents and businesses. We understand that there are certain regional growth issues that have not yet been resolved, such as how to improve the jobs/housing balance and assure that housing is available for a range of income levels. But these issues would need to be addressed no matter what growth alternative is selected.

C-017-002 Newcastle is very concerned about the range of growth that PSRC has considered for our city under the various growth scenarios. For purposes of modeling growth, PSRC used a baseline (year 2000) population of 7,737 for Newcastle, and assumed that the City would add 2,100 to 12,700 people between the years 2000 and 2040 depending on the selected growth alternative. The low end of the range would put us very close to our existing population of 9,175, which means we would have to take measures over the years to prohibit growth. The high end of the range is beyond what we envision as a build-out population that would provide the quality of life our residents desire and expect.

C-017-003 We suggest that the following be added as high priority criteria for selecting a growth scenario:

- The selected growth scenario should allow cities the flexibility to map their own destiny consistent with GMA requirements, including the ability to implement their current Comprehensive Plans.
- The selected growth scenario should set no limit on cities' ability to implement economic development strategies to make themselves attractive to business and financially stable for the long term.
- The selected growth scenario should not limit the ability of cities of any size to receive regional funding for needed infrastructure improvements.

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www.ci.newcastle.wa.us

C-017-001

Thank you for identifying your preference among the alternatives.

C-017-002

The Final EIS includes revisions and clarifications to the alternatives and the planning process, largely in response to public comments on the Draft EIS and Board direction. This includes changing the level of definition for all alternatives to be at a regional geography level of detail, rather than by individual jurisdiction.

C-017-003

VISION 2040 respects local control while seeking agreement on key regional issues. Implementation of the PGA will be accomplished through local plans, which provides the opportunity to ensure that the regional VISION is implemented in a manner responsive to local situations.

C-017-003

- The selected growth scenario should not be one that requires prescriptive Multi-County Planning Policies to implement. Newcastle prefers the current system in which cities within King County collaborate to determine how projected jobs and housing growth should be distributed among us.

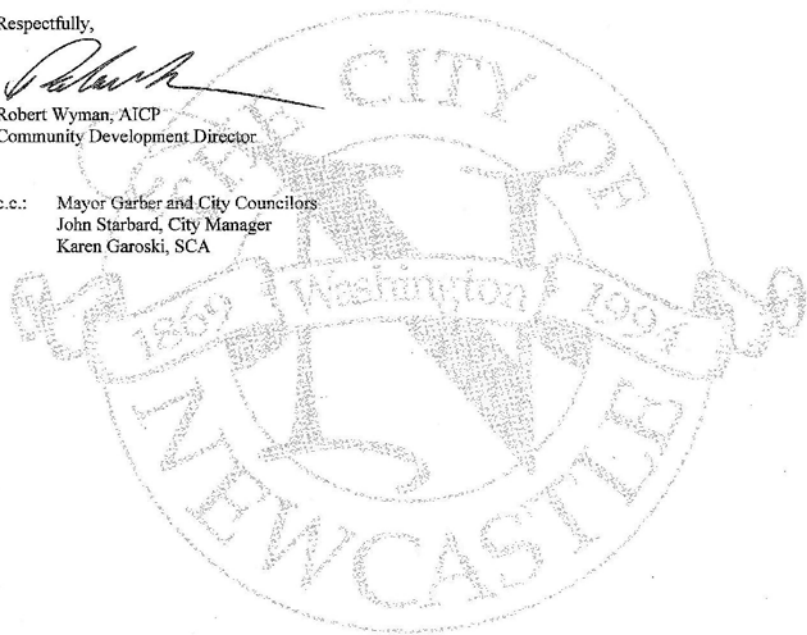
Thank you for taking these comments into consideration in your decision making.

Respectfully,



Robert Wyman, AICP
Community Development Director

c.c.: Mayor Garber and City Councilors
John Starbard, City Manager
Karen Garoski, SCA





CITY OF PUYALLUP

OFFICE OF THE CITY MANAGER

July 31, 2006

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

RE: VISION 2020 Update Draft EIS Comments

Dear Mr. Abbott:

Thank you for the opportunity to comment on the VISION 2020 Update. We recognize the enormous complexity of preparing such a document. The following general comments represent the interests of the City of Puyallup.

- C-018-001** The City does not necessarily support any of the four alternatives as currently described, although we are more in favor of the underlying premise of the Metropolitan Cities and Larger Cities Alternatives to generally target growth to areas with adequate infrastructure and services. We recommend that a "hybrid" growth alternative be developed for review in the Final EIS, and that it address the following issues:
- C-018-002** ■ The population analysis for the various alternatives appears to be trend-based, rather than reflecting buildable lands analysis. Since the carrying capacity of a city is related to the buildable area of the city, as well as other local considerations, this information should be a factor in evaluating alternatives relating to population growth. The City of Puyallup believes that local jurisdictions should maintain discretion in determining their ability to accommodate future growth.
- C-018-003** ■
- C-018-004** ■ The preferred alternative should:
- Be a hybrid of alternatives that promotes a compact regional growth pattern and lowers overall environmental impacts.
 - Direct future growth first to areas with current or planned capacity and infrastructure.
 - Improve the balance between housing and job locations.
 - Reflect a balance between the Metropolitan Centers alternative and Larger Cities alternative because these two would result in lower environmental impacts, more efficient and less environmentally damaging transportation alternatives (e.g.,

Administrative Office Building • 330 Third Street Southwest • Puyallup, WA 98371
(253) 841-5584 • (253) 845-6667 Fax

C-018-001

Thank you for identifying your preference. The preferred growth alternative is a hybrid and responds to many points noted in your letter.

C-018-002

The alternatives are regional and conceptual in nature and therefore do not use buildable lands analysis as their basis. This will be an important step in subsequent local plan implementation of VISION 2040.

C-018-003

VISION 2040 and the Preferred Growth Alternative build upon local plans. Implementation of the PGA will be accomplished through local plans, which provides the opportunity to ensure that the regional VISION is implemented in a manner responsive to local situations.

C-018-004

VISION 2040 policies address the issues raised in your comment. Also, the Preferred Growth Alternative combines many of the best elements of the other alternatives published in the Draft EIS, including the Growth Targets Extended. The PGA seeks to bend trends, and result in a growth pattern that is both ambitious and achievable.

The PGA lowers environmental impacts as compared to current plans (Growth Targets Extended), directs growth to already urbanized areas, calls for increased regional coordination to provide infrastructure to areas accommodating growth, and calls for a closer balance between jobs and housing.

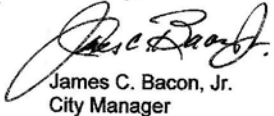
C-018-004

more effective transit, carpools, and other non-motorized options); and the most efficient use of existing infrastructure through infill development of currently underused, buildable land.

- o Recognize that while Regional Growth Centers (RGC) are intended to accept a higher proportion of population and job density, the political acceptability and feasibility of this growth occurring, is dependent on adequate transportation funding being provided to solve some of the regional transportation issues that currently deter the addition of population and jobs in Centers such as Puyallup's South Hill RGC.
- o Discourage major future growth in the smaller cities and unincorporated areas.

The total population growth numbers projected in the DEIS are very significant for the region as a whole; therefore, we encourage continued close coordination with local jurisdictions. We appreciate the opportunity to review and comment on the Draft EIS and look forward to working with you on the next steps towards adoption of an update to VISION 2020.

Sincerely,



James C. Bacon, Jr.
City Manager

c: Mayor and City Council
Tom Utterback, Planning Director



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AUG 04 2006

PUGET SOUND REGIONAL COUNCIL

*fax copy received on
08/01/06*

July 31, 2006

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

RE: Comments on Vision 2020+20 DEIS

Dear Mr. Abbott:

Since before the inception of the Puget Sound Regional Council, the City of Redmond has been a strong advocate for regional planning. As noted in our joint July 31st letter with the Cities of Issaquah and Sammamish, we applaud the efforts of PSRC to look prospectively at potential regional land use strategies. By looking far enough forward, our region can have the ability to implement sound policies and make the necessary allocation of resources so that we can achieve our desired future. We appreciate all the efforts that PSRC is using to broaden the discussion of the Vision 2020 update, as well as your personal efforts in briefing jurisdictions on the update process. With this background, I am offering additional comments regarding general concepts for the preferred alternative, as well as more importantly the need for PSRC to consider additional alternatives that vary the population and employment projections. Further, the alternative growth numbers should in part be based on what is in the long run sustainable within our counties and in the region.

C-019-001

Among the general concepts the City supports and those I hope are utilized in the preferred alternative are:

- Protecting the rural and resources areas;
- Accommodating residential population in the urban area;
- Focusing growth first where there is existing infrastructure and making the needed investments to ensure that existing infrastructure is maintained;
- Improving the balance of housing and jobs; and
- Recognizing the individuality of cities as well as their potential annexation area.

C-019-002

While within King County there has been a strong emphasis placed on preserving the rural areas and focusing growth in the urban areas, we need to see clearly in the preferred alternative and the multi-county planning policies commitment to fund at needed levels

C-019-001

The Preferred Growth Alternative combines many of the best elements of the other alternatives published in the Draft EIS. The PGA seeks to bend trends, and result in a growth pattern that is both ambitious and achievable.

The PGA lowers environmental impacts as compared to current plans (Growth Targets Extended), directs growth to already urbanized areas and calls for increased regional coordination to provide infrastructure to areas accommodating growth, and calls for a closer balance between jobs and housing.

The Preferred Growth Alternative builds upon local plans.

Implementation of the PGA will be accomplished through local plans, which provides the opportunity to ensure that the regional VISION is implemented in a manner responsive to local situations.

C-019-002

VISION 2040 calls for prioritizing growth in centers. Also, VISION 2040 actions call for collaborative work at the regional level to seek to create additional resources for infrastructure.

C-019-002
C-019-003 | the preservation and enhancements of existing infrastructure in existing urban areas so there will be no need to expand the urban areas in the future. In addition, while we have made strides to improve the balance between jobs and housing, the situation is still that most individuals obtaining new employment do not have the opportunity to live near where they work. Vision 2020+20 is an appropriate arena to clearly identify policies/strategies to further address the job/housing balance.

C-019-004 | Further, I believe that the selected alternatives lack an analysis of one key variable: the amount of growth in population and employment forecasts. Early on in the process and the design of the alternatives, I understand that it was determined that the population and employment projections would be held constant, and only the distribution of new population and employment would be varied in the different scenarios.

While I can appreciate the efficiency of this method, I must disagree and request that PSRC also considers varying the projected population and employment growth. OFM sets the 20-year population target for each county by relying strongly on information supplied by PSRC. Likewise in King County, while we target employment at the jurisdictional and countywide levels, our work has relied on the employment forecasts from PSRC. Therefore, the use and effects of your projections are widely felt.

However, I believe with the long-range perspective that 2020+20 affords the region the appropriate venue to discuss earnestly all characteristics of its future vision and not just the distribution of a single number of new residents and employees. If not in the Vision 2020+20 process, where else can we have the opportunity to consider if a reduced level of growth is preferred to a more aggressive level? Certainly the Prosperity Partnership is an example of the PSRC pursuing a strategy "outside of the box" and beyond the accepted forecasts.

I believe that now is the time through the EIS process for PSRC to have the frank regional discussion about our future. This discussion should not only be quantitative, but qualitative, and focus on what is truly sustainable for our region. In this sustainability discussion, we should not be limited by the year 2040, but look well beyond. Therefore, in order for the EIS adequately to do what our region needs, the EIS should consider the effects of other than the growth projections of 1.6 million new residents and 1.1 million new employees.

C-019-005 | Regardless of what we adopt eventually as the new regional plan, we all will be better served by having, as part of the Vision 2020+20 process and EIS, the full evaluation of alternative amounts of growth. Finally, I would hope that this discussion could focus on how much growth we could regionally sustain over time without significant detrimental effects on the quality of life that we all share and appreciate.

C-019-003

VISION 2040 addresses this issue with policies and narrative related to job-housing balance. This issue is also addressed in the Regional Growth Strategy.

C-019-004

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.

C-019-005

VISION 2040 addresses this and sustainability has been added as a key theme throughout the document.

Mr. Norman Abbott
RE: Comments on 2020+20 DEIS
July 31, 2006
Page 3

Should you have any questions or wish to discuss these comments further, please feel free to contact me or Rob Odle, the City's Planning Director, at 425.556.2417.

Sincerely,

A handwritten signature in cursive script, appearing to read "Rosemarie M. Ives".

Rosemarie M. Ives, Mayor
City of Redmond

cc: Suburban Cities Association
Redmond City Council



801 228th Avenue SE, Sammamish, Washington 98075-9509
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July 25, 2006

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

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PUGET SOUND REGIONAL COUNCIL

RE: Comments on Vision 2020 Update Draft EIS

Dear Mr. Abbott:

Thank you for the opportunity to provide the following comments on the Draft EIS. Our comments have benefited from the PSRC presentation on May 9, 2006 and from discussions at the Suburban Cities Association.

- C-020-001** • **Preferred Alternative.** Sammamish supports a hybrid Preferred Alternative that promotes a regional growth pattern of compact urban growth and lower overall environmental impacts. Compact growth promotes transit use, carpools, walking and bicycling.
- C-020-002** • **Incentives.** A variety of incentives should be developed and implemented to help local governments make decisions that reflect the regional vision while being consistent with local needs.
- **Local Control.** The Preferred Alternative and Multi-County Planning Policies (MPP) must preserve the authority to make important land use and density choices at the local level.
- **Fair Share.** All jurisdictions must accommodate their fair share of new growth. Future growth should 1) be focused within the existing UGA, 2) make efficient use of land while respecting environmental needs, and 3) achieve a compact urban pattern of development containing a range of densities.
- **Appropriate Urban Densities.** Sammamish would not support development or adoption of a MPP that would establish a specific, quantitative threshold for urban residential density. Such a policy would overly restrict local flexibility and discretion in planning for growth.
- **Concurrency and Level of Service.** Similarly, Sammamish would not support development or adoption of a MPP or evaluation criteria for local plans that would establish a regional or sub-regional level for transportation concurrency or levels of service.
- **Infrastructure.** The Preferred Alternative and associated MPPs is dependent upon adequate transportation funding in the region so that the necessary transportation improvements to support that growth are in fact provided. If funding is insufficient, the region and local jurisdictions should re-evaluate the land use plan to ensure consistency as required by state law.

C-020-001

Thank you for identifying the City's desired characteristics for a Preferred Growth Alternative. The Preferred Growth Alternative is more similar to the focused growth alternatives such as Metropolitan Cities and Larger Cities. This lowers environmental impacts as compared to current plans (Growth Targets Extended), by focusing growth in already urbanized areas, calling for increased regional coordination to provide infrastructure to areas accommodating growth, and calling for a closer balance between jobs and housing.

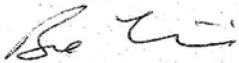
C-020-002

The elements noted in your comment are all found in VISION 2040, which speaks to using incentives to help jurisdictions accommodate growth, supporting local control and decision-making at the local level, and supporting growth with infrastructure. Also, as noted in your comment, VISION 2040 does not contain a minimum density standard, nor a concurrency level of service. Lastly, VISION 2040 does call for all jurisdictions to participate in the accommodation of growth; however, it does not include a simple one-size-fits-all fair share approach.

Mr. Norman Abbott
Puget Sound Regional Council
July 25, 2006 - Page Two

We look forward to the Supplemental Draft EIS, Final EIS and related policy discussion in the coming months. If you have any questions, please contact Kamuron Gurol, Community Development Director at 425-295-0520 or kgurol@ci.sammamish.wa.us.

Sincerely,



Ben Yazici
City Manager

C: City Council
Planning Commission
Community Development

Mayor
Gene Fisher

Deputy Mayor
Ralph Shape

Councilmembers
Chris Wythe
Terry Anderson
Tony Anderson
Joe Brennan
Don DeHan



"The Hospitality City"

City Manager
Craig R. Ward

Assistant City Manager
Tina J. Rogers

City Attorney
Mary E. Mirante Bartolo

City Clerk
Judith L. Cary

DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT

July 31, 2006

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

Re: Comments on VISION 2020 Update Draft Environmental Impact Statement

Dear Mr. Abbott,

Attached are the City of SeaTac's comments for your review. If you have any questions, please contact me at (206) 973-4831.

Sincerely,

Stephen C. Butler, AICP
Director of Planning & Community Development

Enclosures: Vision 2020+20 Comments 3.doc

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SeaTac's Comments on the Vision 2020 Update D.E.I.S.

The Vision 2020 Update Draft Environmental Impact Statement looks ahead toward the year 2040 and seeks to develop a Preferred Growth Alternative (PGA) for accommodating the forecasted 1.6 million new residents and 1.1 million new jobs expected in the central Puget Sound region. The City of SeaTac is participating in the update of Vision 2020 by offering our comments to the Puget Sound Regional Council (PSRC) on the four alternatives that distribute forecasted growth into different types of areas throughout the region.

C-021-001

The City of SeaTac supports a Hybrid Preferred Growth Alternative (HPGA) that combines the concepts embodied in both the Metropolitan Cities Alternative (Alternative 2) and the Larger Cities Alternative (Alternative 3).

Alternative 2 represents the most densely focused regional growth pattern and focuses growth in the region's five major cities: Seattle, Bellevue, Everett, Bremerton and Tacoma. In Alternative 2, growth is also focused in the region's Core Suburban cities: Auburn, Bothell, Burien, Federal Way, Kent, Kirkland, Lakewood, Lynnwood, Puyallup, Redmond, Renton, SeaTac, Silverdale, and Tukwila.

Alternative 3 assumes Core and Larger Suburban Cities with designated regional growth centers would equally accommodate the bulk of future population and employment growth. In addition to the aforementioned Core Suburban cities, primary locations for new development would also include Bainbridge Island, Des Moines, Edmonds, Issaquah, Kenmore, Marysville, Mercer Island, Mountlake Terrace, Mukilteo, Sammamish, Shoreline, University Place, and Woodinville.

C-021-002

The City of SeaTac does not support concepts that disperse growth to Smaller Suburban Cities, such as Buckley, Carbonado, Carnation, Darrington, Duvall, Eatonville, Enumclaw, Gold Bar, Granite Falls, Index, Monroe, North Bend, Roy, Skykomish, Snohomish, Snoqualmie, South Prairie, Stanwood, Sultan and Wilkeson. This option, the Smaller Cities Alternative (Alternative 4), would promote and encourage the conversion of rural land and discourage regional transit visions.

C-021-003

In response to the first of two central questions posed by the PSRC, the forecasted growth for our region should allow for moderate growth and localized revitalization opportunities for Larger Suburban Cities and avoid growth so densely focused that it requires redevelopment of downtown Metropolitan Cities. The PSRC also asks how development, in terms of design, building types and practices, should occur. The City of SeaTac supports the concept that mixed-use and transit-oriented development should occur in an environmentally sustainable way to accommodate forecasted growth in urban areas. SeaTac envisions itself an integral location for growth and transportation services in the coming years and supports concepts that implement design standards in urban villages, shopping and job centers and that also promote pedestrian activity.

C-021-001

Thank you for identifying the characteristics the city prefers for a hybrid alternative. The Preferred Growth Alternative was developed as a hybrid of the previous alternatives, and is more similar to the focused growth alternatives such as Metropolitan Cities and Larger Cities.

C-021-002

Comment noted regarding your concerns regarding the Smaller Cities alternative.

C-021-003

The VISION 2040 Regional Growth Strategy envisions growth in all cities, with a particular focus on cities, such as SeaTac, with regional growth centers. VISION 2040 also contains a set of regional design policies to address the issue of character of growth.

The City of SeaTac would like to take this opportunity to comment on aspects of the growth distribution alternatives which lead us to choose a Hybrid Preferred Growth Alternative (HPGA).

C-021-004

I. Population, Employment and Housing

- a. *The City of SeaTac supports transit-oriented development that allows for a variety of housing types and options available to minority and low-income residents. The City of SeaTac understands the sensitivity to which market sources may potentially determine such options (Alternative 2).*
- b. *The City of SeaTac supports an alternative that distributes growth in transit and pedestrian-oriented areas where there is a balance of affordable housing options near amenities, transit stations and open spaces designed to promote community connectivity (HPGA).*
- c. *The City of SeaTac supports an alternative that shifts economic opportunities for measurable improvement from Metropolitan Cities into Core and Larger Suburban Cities (Alternative 3).*
- d. *The City of SeaTac supports an alternative that has the potential to maximize multi-family housing (Alternative 2).*

C-021-005

II. Land Use

- a. *The City of SeaTac is not opposed to trade-offs when choosing the PGA, such as allowing more density in high-density areas to avoid development of pristine, natural areas (HPGA).*
- b. *The City of SeaTac supports development practices that increase pedestrian activities, include a mix of land uses and encourage residents (young and elderly) to use transit, ride bicycles, walk or rest while living actively (HPGA).*
- c. *The City of SeaTac supports the concept that some lower-density, auto-dominated arterials require redevelopment to become more pedestrian and transit compatible urban transportation corridors (Alternative 3).*
- d. *The City of SeaTac supports an alternative that maximizes opportunities to collaborate with the private sector future visions of town centers in urban areas that serve as neighborhood activity centers (HPGA).*

C-021-004

Thank you for identifying the key features the City would prefer for a regional growth alternative. These characteristics are achievable within the Preferred Growth Alternative, and supporting VISION 2040 policies that address the features you have identified are reflected in the Preferred Growth Alternative evaluated in the Final EIS. Please note that in response to comments on the Draft EIS, PSRC has adjusted the level of specificity for all alternatives, and none of the alternatives identify growth levels for specific cities. The growth alternatives have instead been defined by regional geography. Note that VISION 2040 policies address many of the issues raised in these comments, as well as the comments that follow.

C-021-005

Thank you for providing background on the features or attributes of a preferred alternative that the City of SeaTac could support. Comments such as yours were a key consideration in developing the Preferred Growth Alternative and VISION 2040 multicounty planning policies.

C-021-006	<p>III. <u>Transportation</u></p> <ul style="list-style-type: none"> a. <i>The City of SeaTac supports opportunities to use advanced transportation and information technologies, which demonstrate support for regional growth and transportation strategies (HPGA).</i> b. <i>The City of SeaTac's comprehensive planning efforts support the development of specific station area plans that provide for development, services and facilities sufficient to support efficient transit service commensurate with the regional investment in transit (HPGA).</i> c. <i>The City of SeaTac supports an easily accessible transit-based system serving high-density areas, allowing mobility for residents to transition to and from work quickly without the use of a vehicle (Alternative 2).</i> d. <i>The City of SeaTac supports transportation policies that designate Core and Larger Suburban Cities as future regional high-capacity transit station areas (Alternative 3).</i> e. <i>The City of SeaTac supports alternatives that create the highest transit use, thereby lowering congestion, air pollution (vehicle emissions) and development in pristine areas (Alternative 2).</i>
C-021-007	<p>IV. <u>Air Quality</u></p> <ul style="list-style-type: none"> a. <i>The City of SeaTac does not support alternatives that intensify urban air pollution for existing and future residents and employees, without requiring significant mitigation measures be put in place to offset the negative impacts to public health (Alternative 2).</i>
C-021-008	<p>V. <u>Ecosystems</u></p> <ul style="list-style-type: none"> a. <i>The City of SeaTac does not support alternatives that promote the consumption or conversion of rural land or new development in pristine and sensitive environmental areas (Alternative 4).</i>
C-021-009	<p>VI. <u>Water Quality and Hydrology</u></p> <ul style="list-style-type: none"> a. <i>The City of SeaTac supports an alternative that disperses growth over a larger area, so as not to increase negative impacts on already degraded urban waterways (Alternative 3).</i>
C-021-010	<p>VII. <u>Public Services and Utilities</u></p> <ul style="list-style-type: none"> a. <i>The City of SeaTac supports an alternative that directs transportation and infrastructure funding to Metropolitan, Core Suburban and Larger Suburban Cities for which it will be necessary to make improvements to wastewater systems and other urban resources (HPGA).</i> b. <i>The City of SeaTac supports the least costly alternative for local governments in terms of upgrades to utility systems and services to meet the growing demand of residents and employees (HPGA).</i>

C-021-006

Thank you for your comments regarding the transportation characteristics and supporting policies the City of SeaTac suggests as elements of the Preferred Alternative. Chapter 7 of the Final EIS discusses the multicounty planning policies that have been developed in support of the Preferred Alternative, including several elements that are similar to the City's suggestions.

C-021-007

Thank you for stating the City's position on alternatives with air quality impacts and the need for mitigation.

C-021-008

Thank you for stating the City's preference based on ecosystem issues.

C-021-009

Thank you for your comment. It has been noted.

C-021-010

Thank you for your comment regarding public services characteristics you would like to see in a preferred alternative.

C-021-011	<p>VIII. <u>Parks and Recreation</u></p> <p>a. <i>The City of SeaTac supports an alternative that designates lands for open space and allows Larger Suburban Cities to retain some of their "small-town" feel, balancing the needs of residents with the demands of urbanization (Alternative 3).</i></p> <p>b. <i>The City of SeaTac supports an alternative that decreases competition for park land and reduces difficulties encountered in park development and acquisition (Alternative 3).</i></p>
C-021-012	<p>IX. <u>Environmental Health</u></p> <p>a. <i>The City of SeaTac supports an alternative that lowers levels of potential exposure to hazardous waste materials and sites for residents and employees (Alternative 3).</i></p>
C-021-013	<p>X. <u>Energy</u></p> <p>a. <i>The City of SeaTac supports an alternative that results in the lowest overall energy use (Alternative 3).</i></p>
C-021-014	<p>XI. <u>Visual Quality and Aesthetic Resources</u></p> <p>a. <i>The City of SeaTac does not support alternatives that alter or remove natural landscapes (Alternative 4).</i></p> <p>b. <i>The City of SeaTac supports an alternative that encourages funding for projects that promote downtown revitalization and local station areas plans consistent with transit-supportive design guidelines (HPGA).</i></p>
C-021-015	<p>XII. <u>Earth</u></p> <p>a. <i>The City of SeaTac supports an alternative that lessens the risk for impacts to residents and employees from liquefaction in industrial areas resulting from a seismic event (Alternative 3).</i></p>
C-021-016	<p>XIII. <u>Noise</u></p> <p>a. <i>The City of SeaTac supports an alternative that takes mitigation measures to offset noise levels from sources such as construction, maintenance, and other commercial and industrial operations (HPGA).</i></p> <p>b. <i>The City of SeaTac supports an alternative that maximizes design and physical changes to decrease noise from proximity to new developments, transit and other urbanization (HPGA).</i></p>

C-021-011

Thank you for providing the City's preferences for a growth alternative based on parks and recreational factors.

C-021-012

Comment noted.

C-021-013

Thank you for identifying your preference.

C-021-014

Comment noted.

C-021-015

Comment noted.

C-021-016

Comment noted.

C-021-017

Comment noted.

C-021-017

XIV. Environmental Justice

- a. *The City of SeaTac supports an alternative that increases the potential for social gatherings in urban villages and town centers, thereby increasing residents' sense of community and improving quality of life through increased social connectivity (HPGA).*
- b. *The City of SeaTac supports the concept that transit-oriented developments, urban village and town center plans and designs should attract minority and low-income residents, as well as affluent members of the public (HPGA).*
- c. *The City of SeaTac supports an alternative that promotes the concept of crime prevention in open spaces through environmental design (HPGA).*

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7/31/06

The City of SeaTac's Comments on the VISION 2020 Update D.E.I.S.

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City of Seattle
Gregory J. Nickels, Mayor

Seattle Planning Commission
Barbara Wilson, Executive Director

Jerry Finrow, Chair
Tony To, Vice-Chair
Linda Amato
Hilda Blanco
George Blomberg
Mahlon Clements
Tom Eanes
Chris Fiori
Martin H. Kaplan
Kay Knapton
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Norman Abbott, State Environmental Policy Act (SEPA) Responsible Official
Puget Sound Regional Council
1011 Western Ave, Suite 500
Seattle, WA 98104-1035

July 31, 2006

RE: Comments on the Vision 2020 Update DEIS

Dear Mr. Abbott,

The Seattle Planning Commission has reviewed the Puget Sound Regional Council's Vision 2020 Update Draft Environmental Impact Statement and would like to offer the following initial observations and suggestions.

C-022-001 | Barbara Wilson,
Executive Director
Scott Dvorak,
Planning Analyst

First of all, the Commission commends the PSRC on its comprehensive approach and thorough analysis of how the Puget Sound region will grow in the next twenty years, as well as its development of several scenarios of how that growth might be accommodated. Seeing the raw numbers and how they translate to actual growth scenarios has given the Commission a new perspective on our challenge as a city to accommodate increases in population and employment.

C-022-002

At this point the Commission favors the Metropolitan Cities alternative or the Larger Cities alternative. These seem to be the more sound options based on planning principles such as environmental impacts, livability, and ensuring linkages between transportation and land use. Accommodating such substantial new growth will require proactive planning so that the Puget Sound region can maintain a high quality of life and continue fostering great livable communities while retaining neighborhood character. As the evaluation moves forward we would like to request that three key provisions be considered; 1) impacts to regional industrial lands, 2) housing affordability, and 3) transportation.

C-022-003

Impacts to Regional Industrial Lands

The Commission has advocated for the past several years that the City of Seattle review its industrial lands strategy. It is our view that Seattle's industrial lands are a valuable regional resource that accommodates significant employment, supports the city and regional economy, and provides a location for important infrastructure that contributes to making Seattle a livable place. We recognize the importance of industrial lands on a regional scope and the complicated set of relationships that are developed in a region's industrial network. We recommend the PSRC consider the economic needs of the industrial sector plus those of the region and accommodate those needs in your growth projections. We believe that success in supporting and promoting a thriving industrial sector is a key element of ensuring a thriving Puget Sound region in the future.

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C-022-001

Thank you.

C-022-002

Thank you for identifying your preference among the alternatives.

C-022-003

VISION 2040 has addressed this issue and has policies that continue to support manufacturing/industrial centers. This includes protecting these lands from incompatible uses, and there are supportive freight-related policies as well.

C-022-004 Housing Affordability

Housing affordability is another issue the Commission has spent a considerable amount of time and effort on in the past several years. We are a strong advocate for expanding housing choices and we want to make sure that the region's economic success and our desire to protect what makes Seattle so special does not simply price people out of their ability to live here. The City has some tools at its disposal to address those issues, but the problem is truly regional and will only be adequately addressed at that scale. Therefore, we recommend that the PSRC consider where population growth will be accommodated and how that will both influence and be influenced by affordability. Directing growth on a regional scale along with myriad decisions about the region's infrastructure is one of the most important aspects of your work in ensuring that we will live in a region that is accessible to everyone.

C-022-005 Transportation

The Commission feels strongly that land use and transportation policies need to be profoundly complementary. Transportation investment decisions should begin with the goal of providing an integrated, multi-modal system that reinforces walkable neighborhoods, local transit options and strong regional connections. A good first step would be to direct growth to areas that have the appropriate existing or planned transportation infrastructure in place such as would be the case in the Metropolitan and Larger Cities alternatives of the Vision 2020 Update. However, land use decisions are a complex undertaking and require balancing a host of criteria (including affordable housing and supporting viable industrial areas as mentioned earlier in this letter). Ultimately, what is most important is that the development of land use and transportation policies be an iterative process involving all the necessary government entities in a coordinated effort. Decision-making on transportation investments in the Puget Sound region is decentralized, the PSRC Vision 2020 Update is an opportunity to tie growth targets to transportation and encourage transportation agencies to make the best decisions to provide the appropriate service and facilities to meet the needs of the region.

Obviously there are many pieces to this process and, again, we commend the PSRC for the comprehensive approach you have taken to put all of these pieces together. The Commission looks forward to the revised DEIS and working with the Puget Sound Regional Council on this important work.

Sincerely,



Jerry Finrow, Chair
Seattle Planning Commission

cc:
Mayor Nickels
Seattle City Council
Diane Sugimura, John Rahaim, Tom Hauger, DPD
Grace Crumican, Susan Sanchez, SDOT
Adrienne Quinn, Office of Housing

C-022-004

VISION 2040 addresses the issue of affordable housing with policies and narrative in a stand-alone housing policy section. The issue is also discussed in the Regional Growth Strategy section.

Related policies exist requiring that future growth target allocates be made in housing units, rather than population, which should help with planning for housing in general. There are also policies related to monitoring and provision to collect and analyze housing data.

C-022-005

Concur. As VISION 2040 is being adopted, the Regional Council is beginning the update of the region's Metropolitan Transportation Plan, Destination 2030, to align the transportation projects and strategies with the newly adopted VISION.



City of Seattle

Gregory J. Nickels, Mayor

Department of Planning and Development

Diane M. Sugimura, Director

July 31, 2006

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

Dear Mr. Abbott:

Thank you for the opportunity to review the Draft EIS for Vision 2020 + 20 and the attendant materials. PSRC has undertaken a very important and ambitious project to begin the conversations about how the region should manage its expected growth. I commend the Regional Council for the scope and quality of this work.

Staff from several Seattle City departments have reviewed these documents and contributed comments, which you will find starting on page 3, following our comments on a preferred alternative.

Preferred Growth Alternative

C-023-001

Mayor Nickels supports Alternative 2 – Metropolitan Cities as the best model for accommodating future growth in the region. We recognize that this alternative will likely require Seattle to revise its comprehensive plan and development regulations at some point in the future because the more aggressive growth expectations represented by this alternative probably exceed the City's current zoned capacity. However, we believe that the benefits of this alternative for the region are worth the City making such revisions. In particular, the Metropolitan Cities will help the region in the following areas.

C-023-002

Transportation. The EIS demonstrates that the Metropolitan Cities Alternative performs very well in terms of Seattle's transportation goals and policies. For instance, compared to the other alternatives, it results in the highest percentage of activities near transit and the highest use of transit, biking and walking for work trips. It also performs very well in terms of travel time delay, trip distance and vehicle miles traveled. Additionally, this alternative would produce densities and infrastructure investments that take advantage of demand management and system management improvements, where the more dispersed alternatives would require a higher level of more costly investments in roadway capacity.

By directing growth to denser, more transit-supportive environments, this alternative makes delivery of transit service more efficient. In this light, we believe the preferred alternative should direct growth that occurs outside of metropolitan cities, primarily to

C-023-001

The PGA is a hybrid of the focused growth alternatives (including Metropolitan Cities), and seeks to bend trends and result in a growth pattern that is both ambitious and achievable.

C-023-002

Comments noted. While not as focused as Metropolitan Cities, the PGA shares many of the same benefits.

C-023-002 centers that are located where they can be served by the region's investment in transit, particularly light rail.

C-023-003 **Housing and Human Services.** By concentrating development densities in a relatively few locations, the Metropolitan Cities alternative provides opportunities to produce affordable housing through the use of techniques such as height and density bonuses that would not be as available in more dispersed alternatives. Continuing to focus growth in centers also promotes the revitalization of existing communities.

Because of the continuing upward trend of housing prices, especially compared to the ability of residents to pay, we encourage the Regional Council to develop affordable housing targets for cities that are expected to take growth. It is very important that all jurisdictions provide their share of very-low, low and workforce housing. This should include a regional approach to funding and developing housing for low-income households, including housing for homeless individuals and families so that the county-wide and regional efforts to end homelessness within ten years are successful.

The preferred alternative should encourage the use of inclusionary zoning for producing affordable housing. Many jurisdictions around the country have had such requirements for years. The state legislature enacted a law in 2006 that allows Washington cities to use this important tool as well, to some degree. Not only does this address affordable housing, but it is also helps promote the region's goals for a compact development pattern, efficient transportation system, and reduced impacts on the natural environment.

The preferred alternative should also specify that the metropolitan cities and cities containing regional growth centers must develop plans for providing human services that will meet the needs of their growing populations.

C-023-004 **Natural Environment.** The Metropolitan Cities alternative also helps relieve development pressure on some undeveloped land, particularly on land outside the designated urban growth areas. Preserving open spaces, rural land and natural water bodies contributes strongly to the regional quality of life for current and future residents. By controlling the growth in vehicle trips and miles traveled and by reducing growth pressure on undeveloped land, the Metropolitan Cities alternative would also produce fewer negative impacts to the region's water and air quality. At the same time, it is important to ensure that future development in the metropolitan cities and regional centers occur in ways that provide open spaces and greenery, not only for recreation, but also for the continuation or restoration of natural functions.

In March 2006, the Mayor's Green Ribbon Commission on Climate Protection included among its recommendations that regional decisions for distributing transportation project funds should "acknowledge climate change and address the best approach to reduce greenhouse gas emissions". The Commission stated, "Our region and Washington state need policies that accommodate economic growth but minimize GHG emissions through efficiency." We are pleased to see that the EIS

C-023-003

VISION 2040 addresses housing affordability. VISION contains a stand-alone housing policy section, as well as housing-related actions. While they do not set housing targets for local jurisdictions, they do speak to creating a regional housing action plan, which will likely address many of the issues raised in your comment.

C-023-004

In addition to its focus on urban areas, the Regional Growth Strategy follows the Growth Management Act guidance in support for the long-term use of rural and designated natural resource lands for farming and forestry, recreation, cottage industries, mining, and limited low-density housing supported by rural levels of service. Cities and towns surrounded by or adjacent to rural and resource areas should provide the majority of services and jobs for rural residents, as well as more concentrated housing options. The Regional Growth Strategy provides guidance on levels of residential growth in rural areas, encourages the transfer of development from rural and resource areas into urban areas, and seeks to ensure that proposed levels of development are consistent with rural and resource area character.

C-023-004 addresses climate change and greenhouse gas emissions. That the Metropolitan Cities alternative performs well in this regard is another strong argument in its behalf.

Global warming is real; it is serious. We need to make significant changes in how we live, work and travel. The update of Vision 2020 is an opportunity for this region, which has always been a leader with its environmental ethic, to show that we are willing to make a difference. Therefore, all jurisdictions in the region should be strongly encouraged to adopt a high performance, green building standard. In 2000, the City of Seattle committed to reaching LEED Silver for all City structures over 5,000 square feet in size. King County and the state have since adopted similar standards. In order to reduce the region's environmental footprint, all jurisdictions in the region should commit to such a standard for their own facilities, and should encourage the private sector to reach similar performance standards as well.

DEIS Comments

C-023-005 **Transportation.** Vehicle miles traveled (vmt) is an important transportation indicator, as it influences both congestion and air quality. The environmental justice discussion of transportation (Section 6.5.3) states that "The Metropolitan Cities Alternative is estimated to result in the lowest region-wide vehicle miles traveled in the year 2040. This projection is consistent with the nature of this alternative, which emphasizes centralized growth in the metropolitan cities, where employment and other activities could be generally concentrated in relatively close proximity to transit."

Intuitively, we agree with the above statement and are surprised that the results in Figure.5.3.4 do not support the conclusion that the Metropolitan Cities Alternative performs best in terms of daily vmt. Because there is the greatest proportion of trips by transit, walk and bike modes under the Metropolitan Cities Alternative, we would expect to see it have the lowest vmt for both the freeways and the arterials. However, the Metropolitan Cities Alternative has the second highest freeway vmt, resulting in it having only the second lowest total vmt after the Larger Cities Alternative. Future environmental documents should clarify the apparent contradiction between the two sections of the DEIS.

C-023-006 **Housing.** The draft EIS refers to the relationship between housing and transportation costs, but there should be more emphasis on the fact that housing costs cannot be viewed separately from transportation costs. Although housing may be more affordable if it is dispersed in more rural and suburban areas, the cost of mandatory car ownership, gas prices and other commuting costs consumes much of those cost savings. According to the Brookings Institute, transportation costs are the second largest household expense after housing. By providing more housing options close to employment and transit centers, we can reduce households' transportation costs, as well as strains on the regions road system.

C-023-007 It is not accurate to say "rent increases have slowed in recent years," as the EIS does in a few places. Rents are currently increasing.

C-023-005

Most of the indicators are lower, as you note, with Metropolitan Cities and now with the Preferred Growth Alternative. An explanation of the model results has been made in Section 5.2, and the Environmental Justice discussion has been reworded.

The results come from the location of growth to cities that are connected mostly by freeways, unlike other alternatives which locate growth in cities that are connected by arterials. The PGA on a variety of performance measures falls somewhere in the middle between these two alternatives, and sometimes performs best. See FEIS Appendices I-D and I-C for more information on transportation performance results and application of the evaluation criteria.

C-023-006

The FEIS contains text indicating that transportation costs are part of the issue of affordability, not just the cost of housing alone. This issue is also addressed in VISION 2040 in the transportation and housing policy sections.

C-023-007

The Final EIS now notes that rents are again on the rise.

C-023-008	One significant factor in the rapid costs for housing, which is not mentioned in the DEIS, is construction costs. The cost of construction materials has risen dramatically over the past several years, making it more and more difficult to construct housing that is affordable to low and moderate income households.
C-023-009	There is a reference to "medium-income renters," but it is not clear what this term means.
C-023-010	It is worth noting in the Regulatory Setting section that the King County Countywide Planning Policies currently include affordable housing targets for jurisdictions in the county.
C-023-011	Historic, Cultural and Archaeological Resources. The description of the affected environment in the "Regulatory Setting" section on p. 5.11.2 refers to local laws but only defines and describes federal and state laws in describing applicable laws and regulations because the document is not site-specific; however, some of the suggested mitigation strategies could be interpreted as in conflict with local laws. The document should cite all of the jurisdictions in the region that have preservation ordinances and programs and possibly a link to the applicable laws and regulations.
C-023-012	On page 5.11.6, the last mitigation strategy is "Design guidelines to preserve historic facades." This is not a preferred preservation practice, and we recommend eliminating it from the list.
C-023-013	In several places the document says properties are eligible for listing <u>in</u> , not on the National Register of Historic Places.
C-023-014	Regional Environmental Baseline. This section of the document is a good addition to the regional conversation, and it helps provide context for some of the specific impact discussions that follow in the EIS. Page 7, Paragraph 3, last sentence should include agriculture as a contributing factor to the loss of 50% of the region's native vegetation. Page 8, last paragraph should note that industrial waste was dumped into water ways also. Figure 2.6, Paragraph on Competing Water Uses: add "for terrestrial and aquatic ecosystems" at the end of the sentence. Page 9, figure 2.6, Paragraph on Polluted Sediments: bioaccumulation does not only happen to the largest animals; it happens all the way up the food chain, most affecting primary predators, which are not always the largest animals. Page 10, 3rd paragraph (wildlife and plant species), last sentence: Add "increased" before "competition and predation from other species".

C-023-008

The Final EIS now notes that construction cost increases are also a factor in affordability.

C-023-009

Terms and definitions related to housing income levels are shown in the VISION 2040 housing policy section as well as in the glossary.

C-023-010

The Final EIS acknowledges the King County CWPP as an example.

C-023-011

Additional references to local laws have been included in the Final EIS; however, due to the number of jurisdictions in the region and the non-site specific focus of the alternatives, the FEIS has not attempted to conduct a detailed analysis of the local laws. PSRC agrees that additional local laws would help mitigate or prevent loss of historic resources. Supporting measures are identified as potential mitigation in the Final EIS and have also been considered in the VISION 2040 goals and policies.

C-023-012

The text has been changed.

C-023-013

The text has been corrected.

C-023-014

The edits have been included in the Final EIS.

C-023-014	<p>Page 10, 6th paragraph: Inadequate flows and water depths have these effects in all aquatic habitats, not just backwater habitats.</p> <p>Page 20, paragraph before section D, last sentence should recognize the introduction of exotic predators as a reason for declines in salmon runs.</p> <p>Page 24, 1st paragraph in Conclusions section: Last sentence should recognize that terrestrial and aquatic organisms are affected by the ways land is developed.</p>
C-023-015	<p>Land Use. Page 11, second paragraph in Urban Land Section, first sentence: change "is likely" to "will." With 1.6 million people added to the regional population, the urban areas are certain to become denser.</p>
C-023-016	<p>Page 12, 1st paragraph: Need to provide examples of how development will either help or hinder the maintenance of rural character and economy.</p> <p>Air Quality. The mitigations cited are likely to improve some aspects of air pollution (e.g., the 6 criteria pollutants of CO, Pb, NO₂, PM, O₃ and SO_x) but do very little to reduce global warming pollution. While fuel technology, cleaner cars and planned transportation investments discussed in Section 5.3.1 are useful in reducing the region's contribution to global warming, measures to reduce the amount of vehicle miles traveled could also be applied. These could include such things as more frequent transit service, improvements to the pedestrian and cycling infrastructure, active commute trip reduction programs, HOV lanes, and freight transport management.</p> <p>Some mitigating measures listed in the Transportation section could be counter-productive in terms of reducing pollutants that cause global warming. For instance, additional general purpose travel lanes are likely to have an overall long-term negative impact on air quality and greenhouse gas emissions by inducing travel.</p>
C-023-017	<p>Ecosystems. Page 2, second to last sentence: add elk, black bear and cougar to the list of wildlife species in higher quality habitats.</p>
C-023-018	<p>Page 4, second paragraph: Chum salmon, Chinook salmon and bull trout are protected in marine environments as well as in freshwater environments. Also, a list of the 143 species and their designations would help illustrate the scope of this issue.</p>
C-023-019	<p>Page 11, second sentence: It would be useful to list or map all streams going through urban areas to give an indication of the magnitude and spatial distribution of the concern.</p>
C-023-020	<p>Page 17: Restoration projects for lakes, streams, beaches and wetlands is another potential mitigation measure.</p>
C-023-021	<p>Some places in the document (e.g., 5.5.12 and 5.6.10) use the term "pristine" or "more pristine." Pristine environments are rare and probably do not exist in the areas where development is considered likely. This term could lead the reader to think that</p>

C-023-015

This edit is included in the Final EIS.

C-023-016

Examples have been added. Also, see VISION 2040 development patterns policy section which further addresses this issue.

C-023-017

Those species are now noted in the Final EIS.

C-023-018

The text has been revised.

C-023-019

While a listing of all streams could be useful as a reference for other purposes, this level of detail is beyond the scope of the level of analysis being conducted for the FEIS.

C-023-020

This mitigation is now included in the Final EIS.

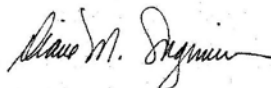
C-023-021

Concur. The FEIS has been updated to change the term "more pristine" to "less developed."

- C-023-021 | other more common environments, that are less likely to be already protected, are not important. Also, given the definition of the word pristine, it is not logical to describe areas as "more pristine." The authors may want to use terms like "less developed" or "more natural."
- C-023-022 | **Water Quality and Hydrology.** Page 11, 1st paragraph in Wetlands, Lakes, Rivers, and Streams section: change word "could" to "will likely".
- C-023-023 | The list of cities that are located in WRIA 8 includes University Place, which is not in that WRIA, and the list appears to leave out some others.
- C-023-024 | **Public Services.** It would be helpful if the EIS provided more information about both the quantitative and qualitative nature of impacts the growth alternatives could have on the provision of public safety services. For example, the impact of future population growth on police staffing could be estimated based on historic needs. In Seattle, the staffing to population ratio has averaged approximately 2.2 officers per thousand residents. On the qualitative side, for example, policing at higher densities (more high-rise buildings, smaller lots) is likely to require more foot patrol and bike beats, as opposed to patrol cars. Also, the large amount of construction activity that would be concentrated in relatively small geographic areas for both alternatives 2 and 3 could present challenges for emergency service providers.
- C-023-025 | **Employment.** More detailed forecast data for specific industry sectors, particularly the sectors (or clusters) identified by Prosperity Partnership would be helpful. The region and the City have adopted a sector-based economic development strategy, and industry-specific forecasts data would help inform decisions related to the transportation system and the provision of energy and utility systems. Also, different sectors use land differently, and in the long term could have significantly different effects on the region's development pattern

Thank you again for your good work on this endeavor. We look forward to continuing involvement with the Regional Council as discussions proceed on the update to Vision 2020.

Sincerely,



Diane M. Sugimura
Director

cc. Tom Hauger, DPD, Comprehensive and Regional Planning Manager

C-023-022

The Final EIS has been revised.

C-023-023

University Place has been removed from the list. The other cities appear to be correctly listed.

C-023-024

While quantitative accurate measures for the full region would require a level of analysis beyond that which is needed to reasonably compare the alternatives, additional qualitative discussion such as those that you suggest have been added to the Final EIS.

C-023-025

The FEIS contains sector level data - see chapter 5.1. Note that the distribution of the regional forecasts was not by sector. Also, see the VISION 2040 economy policy section.



CITY OF SNOHOMISH

Founded 1859, Incorporated 1890

116 UNION AVENUE • SNOHOMISH, WASHINGTON 98290 • TEL (360) 568-3115 FAX (360) 568-1375

July 27, 2006

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

RECEIVED
JUL 27 2006

PUGET SOUND REGIONAL COUNCIL

Re: City of Snohomish Comments on the Draft EIS Vision 2020+20

Dear Dr. Abbott:

- C-024-001** The City of Snohomish appreciates the opportunity to comment on the DEIS for Vision 2020+20. This is an important study and we want to help ensure this environmental review and that the plan incorporates our community's values and concerns. These comments are supplemental to those provided on behalf of member Snohomish County jurisdictions via Snohomish County Tomorrow (SCT). The City of Snohomish is supportive of the comments contained in that correspondence.
- C-024-002** It is clear that the Smaller Suburban Cities alternative will require that communities like Snohomish create a large percentage of the infrastructure that will be needed by future population and employment growth. Said another way, growth would be funneled into areas where infrastructure is presently least available. Smaller communities are already facing significant challenges with funding expensive infrastructure such as sanitary sewer, roads and sidewalks, and domestic water. The Smaller Suburban Cities alternative appears to present unacceptable financial consequences for the City of Snohomish.
- C-024-003** For different reasons, the Larger Cities alternative proffers an unfavorable financial outcome for the City. By channeling virtually all future growth into larger cities, this alternative severely constrains smaller communities' ability to fund essential infrastructure. Some amount of growth in smaller communities is needed in order to reach economies of scale for expensive infrastructure. In many instances, high-priced capital improvements are necessary whether or not future growth occurs. A larger customer base allows some dispersion of those expenses which in turn helps ensure long-term financial stability, which in turn protects rate-payers' interests by supporting a community's bond rating.
- C-024-004** The City of Snohomish has relatively modest, but important, targets for growth. Our Comprehensive Plan calls for 2025 population within the City's UGA of 14,535 persons.

C-024-001

Comment noted.

C-024-002

Comments noted. The Preferred Growth Alternative is much closer to the focused growth alternatives (such as Metropolitan Cities and Larger Cities) than the dispersed growth alternatives (such as Smaller Cities). As such, the growth impacts on cities such as Snohomish are likely to be reduced.

C-024-003

The Preferred Growth Alternative combines the best elements of the other alternatives published in the Draft EIS, including the Growth Targets Extended. The PGA seeks to bend trends, and result in a growth pattern that is both ambitious and achievable. VISION 2040 calls for prioritizing funding in areas receiving growth, and contains policies and goals to this effect. Also, VISION 2040 actions call for collaborative work at the regional level to seek to create additional resources for funding infrastructure, particularly for jurisdiction or areas accommodating a significant amount of growth.

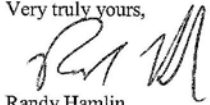
C-024-004

Thank you for providing specific information about the 2025 targets for the City of Snohomish.

- C-024-004** Although this is 43 percent increase from 2002 population, it equates to just 1.52 percent of the County's planned population growth. All funding strategies for our infrastructure—including the development of a new sewer trunk line, now under construction and expected to cost in excess of \$9 million—are founded upon this level of development. . For these reasons, extension of modest growth targets is a critical requirement for our community's success and sustainability.
- C-024-005** Our community is in particular need of an infusion of "family wage" jobs. The largest segment of Snohomish's employment base is in service industry such eating and drinking establishments. Many residents commute to the Everett and Seattle metropolitan areas for gainful employment. Any Vision 2020+20 policy that discourages new employment opportunities within smaller communities will forestall the sustainability of those cities while also perpetuating vehicular congestion and the consumption of nonrenewable resources. PSRC should plan for no less than 6,500 jobs within the City of Snohomish UGA, as called for by the City's Comprehensive Plan.
- C-024-006** The City is embarking upon an annexation study for 375 acres at the northwest corner of SR 9 and US 2. This area is currently not designated as an urban growth area and the study is just getting underway, but its adjacency to these two highways suggest that land uses other than rural would be consistent with GMA. For example, this area could be an ideal site for the institution for higher education planned for Snohomish County. We will be working closely with Snohomish County as this analysis progresses.

Please consider the SCT comments and this letter both as input from the City of Snohomish. You may call me or Planning Director Corbitt Loch at (360) 568-3115 if you have any questions.

Very truly yours,



Randy Hamlin
Mayor

c: Snohomish City Council
Snohomish Planning Commission
Larry Bauman, City Manager
Corbitt Loch, Planning Director

C-024-005

Thank you for emphasizing the importance of family-wage jobs in communities throughout the region, and for stating the City's goals for creating more jobs. Please note that in response to comments on the Draft EIS, PSRC has adjusted the level of definition for all of the growth alternatives to a regional geography level. While the alternatives no longer imply specific goals by individual city, they do still provide the flexibility for cities such as Snohomish to seek population and employment targets through established planning processing under the GMA. Also, VISION 2040 policies address the issue of job-housing balance.

C-024-006

The VISION 2040 process is intended to be complementary to the ongoing actions of cities and counties as they continue planning under GMA. This includes potential annexation actions such as the City has been considering. As noted above, the definition of alternatives has been revised to no longer include detailed targets by city.



CITY OF STANWOOD
Community Development Department

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Stanwood, Washington 98292
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FAX (360) 629-6294

July 31, 2006

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

Via: Fax and Mail

Subject: Comments on DRAFT EIS for Vision 2020+20

Dear Dr. Abbott:

Thank you for the opportunity to comment on PSRC's DEIS for the Vision 2020+20 Plan. Firstly, we would like to complement you and your staff on a comprehensive job with this document. We also extend our complements on your outreach efforts—the website used to inform the public about this document was excellent in design and a model of public outreach for all jurisdictions.

C-025-001

The City of Stanwood concurs with the opinions presented to PSRC from Snohomish County Tomorrow. We have reviewed that letter and were one of the jurisdictions on the Steering Committee who approved its content. We believe the main point of that comment letter would apply to all Snohomish County jurisdictions: Years of comprehensive planning for each of the jurisdictions and Snohomish County has been recently completed, resulting in the adoption of 20-year comprehensive plans under the State Growth Management Act. We encourage PSRC to review the UGAs and growth targets included in each of those Comprehensive Plans, and give weight and thought to the targets and planning that the jurisdictions have done with their communities.

C-025-002

The Stanwood growth targets provide a typical example. The population targets included in the most recent edition of the Stanwood Comprehensive Plan should provide the local planning that should inform the PSRC numbers. Stanwood's adopted growth target for 2025 is 8,840. PSRC's Growth Targets Extended Alternative, the Metropolitan Centers Alternative, and the Larger Cities Alternative fail to show Stanwood reaching that population even in 2040.

C-025-001

Comments noted. Note that VISION 2040 and the Preferred Growth Alternative build upon local plans. Further, implementation of the PGA will be accomplished through local plans which, as requested in your comment, provides the opportunity to ensure that the regional VISION is implemented in a manner responsive to local situations.

C-025-002

Cities were grouped into their respective regional geographies based on year 2000 population numbers from U.S. Census, and PSRC employment numbers from estimates derived from the Washington State Department of Employment Security. PSRC recognizes that as cities continue to grow, both through net increase and through annexation of unincorporated areas, their population and employment levels may change significantly. To correct for these changes, VISION 2040 includes a technical amendment process to potentially reclassify cities before the region's counties undertake the next round of Growth Management Act target-setting work.

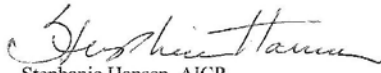
C-025-002 | It would make sense for the Growth Targets Extended Alternative to reflect extension of locally adopted targets. We encourage PSRC to rethink this alternative to give more weight to locally adopted plans and targets.

C-025-003 | We also offer the following comment on the Small Cities Alternative. While the growth target appears closer to an extended growth calculation (at least for Stanwood), the concept of shifting growth toward the outlying small cities is one that will promote sprawl. The intent of the Growth Management Act is to contain growth in actively urban areas. Most small cities, like Stanwood, are surrounded by rural areas. Shifting growth to small cities will result in the conversion of outlying rural areas into pockets of urban development. This will put a greater burden on our regional resources, particularly our transportation network. We encourage PSRC not to adopt this alternative as its "preferred alternative."

Thank you again for this opportunity to comment.

Sincerely,

CITY OF STANWOOD



Stephanie Hansen, AICP
Community Development Director

CC: Mayor Dianne White
Stanwood City Council
Stanwood Planning Commission
Bill Beckman, City Administrator

C-025-003

Comments noted against adopting the Smaller Cities Alternative as the Preferred Alternative. Note that the Preferred Growth Alternative is a hybrid of the focused growth alternatives - Metropolitan Cities and Larger Cities - and is therefore likely to reduce impacts on a city the size of Stanwood.



July 31, 2006

CITY OF SUMNER
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Sumner, Washington 98390-1423
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David L. Enslow, Mayor
John Doan, AICP, City Administrator

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

RE: VISION 2020 Update Draft EIS Comments

Dear Norman:

C-026-001 City staff has reviewed the four alternatives presented in the Draft Environmental Impact Statement for the VISION 2020 Update and recommends that the PSRC consider the Large Cities alternative or a similar alternative as the Preferred Alternative for analysis in the FEIS.

The reasons for this are as follows:

1. This alternative provides a compromise between the Metro Cities Alternative and the other more dispersed alternatives with moderate adverse impacts to the environment, transportation systems, infrastructure, and rural and natural resource lands.
2. The Larger Cities would bear a greater proportion of the growth and development and costs associated with supplying urban level of services. These larger cities are arguably better positioned to finance these types of improvements and to accommodate a character and density of growth with less impacts to the existing urban fabric and aesthetics of the community than Smaller Cities.
3. Growth and development in Smaller Cities, such as Sumner, and especially areas adjacent to Sumner, will see less demand for growth with this alternative. This reduced demand will keep cut-through commuter traffic on arterials below that of the Smaller Cities or Growth Targets options.
4. Minimizes localized impacts in Metropolitan Cities such as noise, air, water pollution and impacts to historic and cultural areas.
5. Minimizes pressure to develop at the fringe or in unincorporated areas thereby reserving lands for future development for a greater period of time. This puts less growth pressure to expand urban growth areas in Sumner which borders the urban growth area in Pierce County.
6. Concentrates higher density housing in core Larger Cities that would have greater ability to accommodate this type of growth (apartments, townhouses, and condominiums) within an urban character that exists today. This would result in less demand for higher density housing in the Smaller Cities such as Sumner that would have a greater potential impact on the existing small town fabric and character.

Providing needed and valued services that promote our sense of community

C-026-001

Comments noted. As suggested in your comments, the Preferred Growth Alternative combines many of the best elements of the other alternatives published in the Draft EIS, including the Growth Targets Extended. The PGA seeks to bend trends, and result in a growth pattern that is both ambitious and achievable. Note that the Preferred Growth Alternative is a hybrid of the focused growth alternatives - Metropolitan Cities and Larger Cities - and is therefore likely to reduce impacts on a city the size of Sumner.

C-026-001

7. Social services for underprivileged populations would be more accessible in the Larger Cities and create less demand for these services in the Smaller Cities that may have less capacity to accommodate them.
8. A greater population would be close to parks and have access to open space areas in the Larger Cities alternative than the Smaller Cities alternative.
9. The Larger Cities alternative maximizes the utilization of the current regional investment in high-capacity transit.

I appreciate the opportunity to review and comment on the Draft EIS and look forward to working with you on the next steps towards adoption of an update to VISION 2020.

Sincerely,



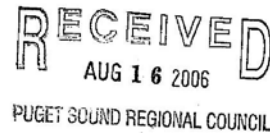
David Enslow
Mayor

Cc:

John Doan, City Administrator
Paul Rogerson, Community Development Director
Ryan Windish, Senior Planner



City of Tacoma
City Manager



August 14, 2006

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

Dear Mr. Abbott:

City of Tacoma staff have reviewed the Draft EIS for the Vision 2020 Update and offer the following comments. Please note I am only forwarding comments from City staff as the City Council has not taken a position on this matter.

- | | |
|------------------|--|
| C-027-001 | 1. The Vision 2020 + 20 Update should continue to support the centers concept as the focus for future population and employment growth, while recognizing the differences among the four counties in the number of designated centers, their location, capacity and evolving development pattern. |
| C-027-002 | 2. The Metropolitan Cities Alternative is favored with some modification. The alternative would support the City's current planning vision, although some modifications to our Comprehensive Plan would be needed. There are two Metropolitan Cities in King County and one each in the other counties (the largest city). The assignment of the majority of future population and employment growth to these cities has different effects in each county. The number of Core Suburban Cities, which also receive a significant share of future growth with this alternative, vary by county. Pierce County has two cities within this category: Lakewood and Puyallup, while King County has nine cities. The distribution of growth in the region should consider these differences. Generally, the cities in Pierce County are less dense and have a greater capacity to accommodate increased residential and employment growth. However, the Metropolitan Cities Alternative directs more growth into the King County cities some of which have limited capacity to absorb new growth, Seattle being the prime example. |
| C-027-003 | On the other hand, the Growth Targets Extended Alternative distributes a greater percentage of growth to Pierce, Kitsap and Snohomish counties. Tacoma would support the addition of University Place, a larger suburban city, to the Metropolitan Cities Alternative to create a new hybrid alternative that would redistribute the growth in Pierce County and may produce an option that combines the best attributes of both the Metropolitan Cities and Growth Targets Extended Alternatives. University Place is adjacent to Tacoma and part of the central urban core of Pierce County. University Place also shares on its northern border proximity to one of |

C-027-001

VISION 2040's Regional Growth Strategy, as well as its multicounty planning policies, retain a growth centers-based focus.

C-027-002

The Preferred Growth Alternative combines many of the best elements of the other alternatives published in the Draft EIS, including metropolitan cities. The PGA seeks to bend trends, and result in a growth pattern that is both ambitious and achievable. Related to this comment, the PGA seeks to address the issue of job-housing balance by promoting an increasing share of growth in major cities outside of King County, including cities such as Tacoma.

C-027-003

See the previous response. Note that the PGA envisions the largest share of growth being accommodated in Metropolitan Cities such as Tacoma. Cities such as University Place also receive a significant share as well.

C-027-003	Tacoma's designated mixed-use centers (James Center/TCC), which is also the location of a Pierce Transit regional transit center. In addition, this center is proposed as a possible terminus for the extension of light rail. In creating the hybrid, Tacoma as a Metropolitan City with two growth centers--a manufacturing/industrial center and twelve locally designated centers--should still receive a greater share of population and employment growth than that allocated to the other cities in Pierce County.
C-027-004	3. The Metropolitan Cities Alternative and/or a new hybrid alternative as described above would require Tacoma to accommodate an increased level of growth and therefore may increase direct impacts to our citizens; however, it also assures the economic viability of the city in the future. Older cities such as Tacoma must be vigilant to remain competitive and prevent disinvestment. Redevelopment assures that past investment will continue to serve future generations and to enable current Tacoma residents and our future residents to have a high quality of living that comes with redevelopment. A greater share of employment growth should be allocated to Tacoma where transportation investments have been targeted to support economic development and to support the full development of its designated manufacturing/industrial center and growth centers as well as its locally designated centers. Increasing employment in Tacoma would serve the region better than placing the majority of employment into King County which would continue to require long commutes for our residents. Tacoma's percentage of low-income population is greater and located in proximity to our regionally designated centers. Increasing employment in and near the populations in most need is consistent with the objectives of environmental justice.
C-027-005	
C-027-006	4. The analysis of the Growth Targets Extended Alternative points out a flaw with continuing current planning whereby residential growth is targeted to both urban dense areas (good), and to the least dense outlying areas (not so good). The development pattern, which we have witnessed in the last 10-12 years in Pierce County, has the highest growth rates occurring in the outlying areas. Although Tacoma has planned for more housing and was the first city in the state to provide the multi-family tax exemption to encourage new housing, the City cannot by itself overcome the lack of growth controls placed elsewhere. A regional vision to concentrate housing development in the Metropolitan Cities, which are the heart of each county, would dissuade the tendency to locate housing farther and farther away from employment and adding to the growing transportation problem.
C-027-007	5. The existing land use map, Figure 5-2-16, is misleading in that it shows all of Northeast Tacoma and the majority of the port industrial area in the Tribal-Gov-Military category. The legend also indicates Point Defiance Park in this same category.

C-027-004

See the responses above. Also, VISION 2040 includes policies and narrative related to promoting a closer balance between jobs and housing.

C-027-005

Comment noted.

C-027-006

Your comment is noted. The Preferred Growth Alternative focuses on growth in metropolitan cities and continues to emphasize the importance of focusing growth in major regional centers.

C-027-007

Comment noted. The map is meant to be broad and illustrative.

Puget Sound Regional Council
August 14, 2006
Page Three

City of Tacoma staff appreciate the opportunity to provide these comments and look forward to continuing to work with the Regional Council.

Sincerely,

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

Eric A. Anderson
City Manager



City of Tukwila

Department of Community Development

Steven M. Mullet, Mayor

Steve Lancaster, Director

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

RECEIVED
JUL 28 2006
PUGET SOUND REGIONAL COUNCIL

July 26, 2006

RE: VISION 2020 Update—City of Tukwila DEIS comments

Dear Mr. Abbott:

C-028-001

Thank you for providing the opportunity to comment the Vision 2020 Update Draft Environmental Impact Statement. The document is very thorough in its development and discussion of alternative scenarios and their impacts.

The City of Tukwila believes that it is in the region's best interest to select a growth alternative that clearly supports development in existing larger cities. We believe that retaining and strengthening the existing Regional Growth Center and Manufacturing/Industrial Center concepts and designations is an appropriate means to accomplish this goal.

The City of Tukwila believes the options that focus on Core Suburban Cities and their regional centers (including Regional Growth Centers (i.e. urban centers) and Manufacturing/Industrial Centers) are the most likely to improve regional prospects for new development, redevelopment and income generation, while promoting environmental equity, making most efficient use of existing infrastructure and reducing sprawl and pollution.

C-028-002

Similarly, multi-county planning policies that focus on centers and continue to direct future development into designated urban growth areas and their cities will be most beneficial to the region. Establishing a range of housing types in regional growth centers, and maintaining the centers as a focus for transportation and transit improvement funding should be clear policy priorities.

C-028-003

Regional employment and population growth will occur under each alternative, but focusing on the core suburban cities will allow the most efficient use of existing facilities and infrastructure for development, redevelopment and infill, while still providing a full range of choice for residents and businesses. From this perspective, Tukwila believes that the Larger

C-028-001

The Preferred Growth Alternative retains the urban centers approach and combines many of the best elements of the other focused growth alternatives published in the Draft EIS. The PGA seeks to bend trends, and result in a growth pattern that is both ambitious and achievable.

Note that the Preferred Growth Alternative is a focused growth alternative - such as Metropolitan Cities and Larger Cities - and is therefore likely to provide greater benefits to Core Cities such as Tukwila.

C-028-002

As suggested in your comment, VISION 2040's Regional Growth Strategy and multicounty planning policies retain a centers-based focus.

C-028-003

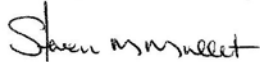
As noted in the response above, the PGA is a focused-growth hybrid of the alternatives studied in the DEIS.

C-028-003

Cities alternative is the most desirable, followed by the Metropolitan Cities alternative. The third choice would be the Growth Targets Extended Alternative. The Smaller Cities Alternative is the least desirable.

Thank you again for the opportunity to provide comments. The City of Tukwila looks forward to working with the Puget Sound Regional Council as the preferred alternative is selected and the multi-county planning policies are refined.

Sincerely,



Steve Mullet
Mayor, City of Tukwila

Cc/
Tukwila City Council
Michael Hubner/Suburban Cities Association

From: "Sarah Ruether" <SarahR@ci.woodinville.wa.us>
To: <vision2020update@psrc.org>
Date: Fri, Jul 28, 2006 4:45 PM
Subject: Comments on Vision 2020 DEIS

Comments on Chapter 4: Growth distribution alternatives, City of Woodinville

C-029-001 | Our two preferred growth distributions are the: large cities alternative and the metropolitan cities alternative.

C-029-002 | The larger cities alternative is chosen as the first choice for a growth alternative because we believe that Core suburban cities would have more land available to absorb new commercial growth. We also believe this alternative provides more economic opportunity for the region while also providing the necessary density provide an efficient transit system which would reduce single occupancy vehicle trips. While the metropolitan cities alternative is also a good alternative, with an already limited supply of available land in our metropolitan cities, if more growth was concentrated in these cities, land values could go up so high that commercial land uses would get priced out and therefore pushed out. The benefits of both the metropolitan cities alternative and the large cities alternative is that if you concentrated growth in already dense areas, transit connections and the creation of dense business districts would be possible. However, the larger cities alternative would allow for more regional centers, and more opportunities to create multiple dense centers, while still controlling growth, so this is our preferred alternative.

Sarah Ruether

Transportation/Environmental Planner

City of Woodinville

(425) 489-2700 ext.2293

sarahr@ci.woodinville.wa.us

CC: "Mick Monken" <MickM@ci.woodinville.wa.us>

C-029-001

Comments noted regarding your preferences among the alternatives.

C-029-002

Comment noted. Note that the PGA is a hybrid of the focused growth alternatives, seeking to create an alternative that is ambitious and achievable.



CITY OF UNIVERSITY PLACE

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University Place, WA 98466-4456

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city_hall@cityofup.com

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AUG 17 2006

PUGET SOUND REGIONAL COUNCIL

August 15, 2006

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

RE: Vision 2020+20 Update Draft Environmental Impact Statement

Dear Mr. Abbott:

C-030-001

As you know the City of University Place is currently building a new mixed-use, pedestrian-oriented urban center in our Town Center Zone. This urban center will include approximately 500,000 square feet of retail space, 150,000 square feet of office space, and 600 new housing units. In addition to commercial and residential uses, civil uses including a new transit facility, city hall, library, public plaza, and park will be located in the urban center. These are all components of an "Urban Center" as defined by the Puget Sound Regional Council's Designation Criteria for Regional Growth Centers.

The urban center currently under construction will act as a catalyst for redevelopment of the remainder of the Town Center Zone, an area approximately 1 square mile in size. The City has adopted design standards and incentives to facilitate the development of this compact urban center.

The development of our urban center serves to meet many of our Comprehensive Plan goals and is consistent the Pierce County Countywide Planning Policies and the Growth Management Act (GMA). These goals include but are not limited to providing a range of housing opportunities for all economic segments of our population, providing public facilities and services in a cost-efficient manner, developing a multi-modal transportation system, and promoting economic development while maintaining a park and creating a public plaza. The development of our urban center is consistent with the Larger Cities Alternative examined in the Vision 2020+20 Update DEIS.

C-030-002

The City generally agrees with the findings summary of potential impacts associated with the Larger Cities Alternative as they relate to transportation, air quality, public services and utilities, parks and recreation, environmental health, energy, historic cultural and archaeological resources, visual quality and aesthetic resources, and earth impacts. With regard to transportation, our residents have expressed in city-wide surveys an explicit desire to work and shop locally, reducing their need to travel longer distances for jobs and to obtain the goods and services they require. Fewer and shorter trips mean less traffic impact and less air pollution.

C-030-003

C-030-001

Thank you for providing information regarding the city's planning activities.

C-030-002

Comment noted.

C-030-003

VISION 2040 addresses these issues, with policies related to job-housing balance, support for local business, and minimizing the impacts of transportation.

075

C-030-004

However, the City disagrees with the findings that the Larger Cities Alternative would necessarily have a significant impact on land use, ecosystems, water quality, and hydrology. It is important to recognize the years of planning efforts many larger cities have invested since passage of the GMA. Most larger cities now have areas zoned for different land-use intensities including low, medium, and high density residential, office, commercial, mixed use, and industrial uses. These cities also, as mandated, have identified and are protecting critical areas including fish and wildlife habitat, streams, wetlands, and shorelines. It seems unlikely that as growth occurs, low-density neighborhoods would be rezoned to high density or critical habitat would be paved over with parking lots. Rather it is more likely that existing high-density residential areas would be redeveloped with increased density and critical areas would remain protected.

We look forward to further review of the proposed Vision 2020+20 Update as your process continues. Should you have any questions regarding our comments, please do not hesitate to call me at (253) 460-2519.

Sincerely,

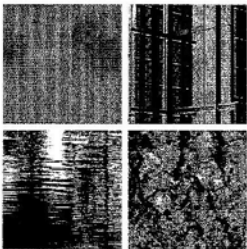


David Swindale, AICP
Development Services Director

cc: Steve Sugg, Community Development Director
DS/pjw

C-030-004

The analysis of impacts in the FEIS describes potential impacts and recognize that variation could exist in how each alternative could be implemented. As noted in your comment, the levels of growth noted in the Larger Cities Alternative could be implemented with fewer impacts, depending on local actions. Finally, note that the definition of the alternatives has been revised and no longer contains figures at the individual city level.



VISION 2020 Update Draft Environmental Impact Statement

Comment Form

What's your vision for the future of the central Puget Sound region? We want your input and need to hear from you!

The public comment period ends on Monday, July 31, 2006.

The public is encouraged to provide thoughts, ideas, and concerns on the Draft Environmental Impact Statement to help select a preferred growth alternative. Comments should 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 vision2020update@psrc.org.
- By attending any of PSRC's board or committee meetings. 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 develop a preferred alternative. 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/datapubs/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 Thelma Coney
ORGANIZATION Advisory Council on Aging + Disability
ADDRESS 731 Federal Ave. East
CITY Seattle STATE WA ZIP 98102
E-MAIL temconey@yahoo.com

☐ Check here if you would like to be added to the project mailing list.



YOUR INPUT IS NEEDED

The region has some tough choices to make to get from four broad alternatives to a single vision that reflects our shared values and aspirations. Participants in the review process are asked to comment on the growth alternative that appears to best meet the needs of the region. You are welcome to mix and match portions of the alternatives that have been included in the Draft Environmental Impact Statement to form a hybrid that represents an alternative you prefer.

PLEASE CONSIDER COMMENTING ON THE FOLLOWING SUBJECT AREAS:

1. The environmental baseline (see Chapter 2)
2. The growth distribution alternatives — including ideas for a Preferred Growth Alternative (see Chapter 4)
4. Environmental justice (see Chapter 6)
3. Discussion of multicounty planning policies (see Chapter 7)

COMMENTS:

Y-001-001

As a resident of the area's densest neighborhood — Capitol Hill — since 1958, I have had many concerns over the years. These include: excessive airplane noise (slightly reduced thanks to ^{some} quieter planes); high rents on Broadway driving out the independently varied businesses that graced the street the first 20 years or so, and, more recently, replacement of single-family homes with doubled-up "4-packs" totally unsuited to older people. CH has become a neighborhood of singles primarily, but should be one that could (as it once did) accommodate an elderly population as well. ^{Goodway} It has good transportation, close to clinics, hospitals, & downtown, etc. But developments have cut them out...

Very unbalanced & very poor planning for such a central location in Seattle.
Thelma Coney

PLEASE ADDRESS COMMENTS TO:

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

Y-001-001

Thank you for providing your observations on the effects of growth and development on your neighborhood. These issues are best addressed at the local level through your jurisdiction.





Ron Sims
King County Executive
701 Fifth Avenue, Suite 3210
Seattle, WA 98104
206-296-4040 Fax 206-296-0194
TTY Relay: 711
www.metrokc.gov

July 31, 2006

Norman Abbott, Director of Growth Management Planning
and SEPA Responsible Official
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104-035

Dear Mr. Abbott:

Y-002-001 Thank you for the opportunity to provide comments on the Puget Sound Regional Council Vision 2020 Update Draft Environmental Impact Statement (DEIS.) This is clearly a unique opportunity to shape the future of our region that will leave a legacy for generations to come. To prepare these comments, I have asked several King County departments to provide me with their perspective on the DEIS. This letter is a compilation of those comments.

King County applauds the Puget Sound Regional Council (PSRC) for developing the growth vision within the current urban area and for acknowledging the long term protection of our natural resource lands and rural areas consistent with the state Growth Management Act. We support the proposed density increases that would result from the Metropolitan Cities Alternative (Alternative 2) and the expanded transportation network as envisioned in the Larger Cities Alternative (Alternative 3.) Please refer to our comments in Section I for the explanation of our recommendation for a preferred growth alternative.

Y-002-002 King County is supportive of the creation of a fourth policy board focused on Climate Change and the Environment. We believe that this board would complement the existing three boards on Transportation, Growth Management, and Economic Development. The protection of our environment is truly an interjurisdictional issue that would benefit from a dedicated forum at the PSRC.

Attached to this letter are more specific and technical suggestions on how best to move the region forward. I trust you will find our comments beneficial as you begin to shape the preferred alternative growth pattern for the region.



*King County is an Equal Opportunity/Affirmative Action Employer
and complies with the Americans with Disabilities Act*



Y-002-001

Thank you. Comment noted regarding your preferences among the alternatives.

Y-002-002

Comment noted regarding your support for creating a fourth policy board at PSRC that is focused on regional environmental planning.

Y-002-003 **I. Growth Distribution Alternatives**

We recommend that the preferred growth alternative be drawn from the best components from first three alternatives analyzed in the DEIS. We do not support the fourth alternative, Smaller Cities, because it calls for the greatest dispersion of housing and employment. Specifically, we support a hybrid of Alternatives 2 and 3 because they depict the greatest share of growth going to the largest cities and centers and the smallest share going to the rural areas.

Y-002-004 We would like to see that any growth proposal based on Alternative 2 accommodate the projected growth and employment in a way that maintains livability, such as through a focus on centers. We recommend that the Vision 2020 Update direct population and employment growth to designated centers, rather than to jurisdictions. The centers-based planning approach was first introduced in the original Vision 2020 plan adopted in 1990. Focusing growth in centers continues to be desirable to promote transit use and walking between closely spaced activities.

Additionally, the newly revised Commute Trip Reduction (CTR) legislation requires each region to develop regional CTR plans that emphasize more intensive trip reduction policies in centers through the creation of Growth and Transportation Efficiency Centers. The Vision 2020 Update should recognize the importance of centers as a growth strategy. This will help facilitate jurisdiction planning and development of the more intensive trip reduction policies and programs for specific growth centers.

Y-002-005 Please note that the first three alternatives forecast a greater share of growth going into King County than recent trends. For decades, King County has received a diminishing share of the region's population growth: 46.6 percent in the 1980s, 43.6 percent in the 1990s and less than 40 percent thus far in the 2000s. Alternatives 1, 2, and 3 will raise that share to a level last seen in the 1980s. This could only be acceptable with appropriate mitigation such as improved infrastructure and enhanced regional environmental controls.

We are concerned that the alternatives do not accurately reflect growth trends in King County because unincorporated urban areas are treated as a separate geography. In King County, almost all unincorporated urban areas are associated with an existing city. These areas will grow as their adjacent cities will grow and not in a separate and distinct way. We expect the preferred growth alternative to identify all of unincorporated urban King County as part of a city. The King County Countywide Planning Policies includes a map, Interim Potential Annexation Areas, depicting the association of urban unincorporated areas with adjacent cities. This map can serve as the basis for your further work.

Y-002-006 The preferred growth alternative must also be evaluated in relation to climate change. We recommend that the reduction of vehicle miles traveled (VMT) be used as the primary metric for ensuring benefits from climate change, air quality, efficient transportation, active living, land use plans and preservation of open space.

Y-002-007 Finally, the results of the alternatives are difficult to interpret. An explanation of the working hypothesis about the reasons the results turned out as they did would be beneficial. It is also difficult for the average person to imagine what land use would look like under the different

Y-002-003

The Preferred Growth Alternative is a hybrid, and is similar to the focused growth alternatives - such as Metropolitan Cities and Larger Cities - and is therefore likely to provide the benefits suggested in your comment.

Y-002-004

VISION 2040 addresses this issue with policies related to CTR and centers, and centers are an important part of the regional growth strategy as well.

Y-002-005

The PGA is a hybrid of the focused growth alternatives published in the Draft EIS. It shifts some population growth to job rich areas and some employment growth to housing rich areas to help address the issue of job-housing balance. Also, under all of the alternatives, growth is not assigned to unincorporated urban areas at the potential annexation area level. The Regional Growth Strategy does, however, state a preference for growth in the unincorporated urban areas to be in areas affiliated for annexation rather than those unaffiliated, in order to promote the affiliation of all of these areas with cities for annexation. Additional detail regarding the Regional Growth Strategy's figures can be found in the FEIS Appendix I-A.

Y-002-006

Vehicle Miles Traveled is one of the evaluation criteria used to develop the Preferred Growth Alternative. Also, VISION 2040 addresses reducing per capita vehicle miles traveled.

Y-002-007

VISION 2040 does contain maps and tables to illustrate the alternatives, as does the FEIS. In the final "coffee table" version that is to be

Y-002-007 alternatives and how significant the impacts would be. An effort should be made to help “visualize” the vision in terms and illustrations that make it meaningful.

II. The Transportation System

Y-002-008 We support shifting a greater share of growth to centers outside of Seattle and Bellevue, and to restricting the share of growth designated for rural areas. However, we continue to support designation of Seattle and Bellevue as regional centers, having a greater scale and level of regional access than other centers within King County. A transportation strategy to maintain regional centers without incurring added congestion and long distance auto commuting should emphasize intensive transit service in the core of the region, management of freeway HOV lanes to offer high quality bus service in other regional corridors, and pricing and management of freeways to shorten average commute trips and limit low-value discretionary travel.

Y-002-009 The Supplemental Draft Environmental Impact Statement (SDEIS) should examine mode split for the preferred alternative in greater detail than is done in the DEIS in Figure 5-3-4 on page 5.3.14. We recommend setting mode split goals for centers and then evaluating the preferred alternative based on its ability to meet these goals within centers. The mode split goals should include numbers for all non-single-occupant-vehicle trips including transit, bicycling, walking, carpooling, vanpooling and other as evaluated by the census.

Y-002-010 The analysis assumes that the transportation improvements based on Destination 2030 are held constant and tests which land use options work best with them. We recognize that it is difficult to analyze simultaneous changes to both transportation and land use. However, a change to the regional land use vision should only be made in the context of policies that will align the new vision with a transportation strategy that will achieve it. Existing transportation plans have been formulated to serve the existing vision, and they will need to be revisited and potentially changed if the vision is substantially amended.

III. The Environmental Baseline

A. Climate Change

In March of this year, I issued a series of four Executive Orders (attached) on climate change. These orders underscore the connection between global warming, land use, and transportation.

King County recommends that the PSRC take a closer look at the effect of land use on impacts to global climate change. To do so, we recommend adding a Climate Change Issue Paper to outline the current state of the environment, factors contributing to climate change, and new initiatives to reduce and eliminate impacts from climate change. King County would like to work with the PSRC and the University of Washington's Climate Impacts Group (CIG) to develop this issue paper. Climate change will also affect public health. Among the likely health effects of climate change are mortality and morbidity related to urban heat islands, respiratory system impairment, and social or economic instability related to water supply uncertainty. (Greater details about climate impacts are outlined in the attached CIG white paper. An additional attachment outlines King County concerns related to climate change impacts on health.)

developed after the VISION is adopted, additional illustrations will be added.

Y-002-008

The suggestions in this comment have been incorporated into VISION 2040 multicounty policies and Regional Growth Strategy.

Y-002-009

This issue of mode split goal has been addressed in VISION 2040 which calls for these types of goals to be set. The FEIS Appendix I-E provides additional information on mode splits.

Y-002-010

PSRC agrees. In addition to the VISION 2040 multicounty planning policies, PSRC has initiated a major update of Destination 2030 to align it with VISION 2040.

Y-002-011

VISION 2040 addresses climate change, with multicounty planning policies in the environment and transportation sections, as well as in other sections of the document. VISION 2040 begins with an environmental framework chapter, and its implementation actions include future work calling for the Regional Council to explore its role in regional environmental planning and for developing a climate change plan. Also, climate change is a key element in the update of Destination 2030, the region's metropolitan transportation plan.

Y-002-011

There is growing support within the four counties of the PSRC for concerted action to reduce greenhouse gas (GHG) emissions as evidenced by the growing number of Puget Sound cities that have declared their intention to meet GHG reduction goals modeled upon the international Kyoto Resolution. Below is the list of fourteen cities within the PSRC region that have signed on to the U.S. Conference of Mayors' Climate Protection Agreement.

Mayor	City
Peter B. Lewis	Auburn
Darlene Kordonowy	Bainbridge Island
Noel Gibb	Burien
Gary Haakenson	Edmonds
Ray Stephanson	Everett
Ava Frisinger	Issaquah
Mary-Alyce Burleigh	Kirkland
David Hutchinson	Lake Forest Park
Mike McKinnon	Lynnwood
Rosemarie Ives	Redmond
Kathy Keolker	Renton
Greg Nickels	Seattle
Robert L. Ransom	Shoreline
Bill Baarsma	Tacoma

We recommend that PSRC consider the following actions related to climate change:

1. Create a fourth board – in addition to land use, transportation and economic development – for “Climate Change and the Environment”;
2. Establish reduction of vehicle miles traveled (VMT) as the primary metric for ensuring benefits from climate change, air quality, efficient transportation, active living, land use plans and preservation of open space; and
3. Develop greenhouse gas reduction criteria for approving transportation projects and land use plans

(Greater Details about these specific recommendations are outlined in an attachment to this letter.)

Y-002-012

B. Reclaimed Water

Reclaimed water will play an increasingly important role in water supply planning for the Puget Sound region between now and 2040 along with other water resource management tools such as conservation programs and regional system interconnections. Each of the alternatives described in the DEIS includes opportunities for utilizing highly treated

Y-002-012

Reclaimed water is identified as a potential mitigation measure and is included in VISION 2040.

Y-002-012	<p>wastewater in varying amounts depending upon the projected population growth and its location.</p> <p>Ecology is currently developing rules to enforce existing regulation on withdrawals from surface water and groundwater. Driven by instream flow requirements and other ecological considerations, the likely future result will be that individuals and businesses that currently rely on these sources, e.g. golf courses and farms, will be required to seek other sources of water. In this environment, reclaimed water can play an important role as a sustainable, drought-proof source of non-potable water for irrigation.</p> <p>King County, along with the Cascade Water Alliance has engaged major water purveyors in the regional water supply planning process that is currently underway. As part of this regional effort, reclaimed water, its benefits and barriers for use, are being analyzed for future water supply planning processes by individual governmental entities. A final report is expected at the end of 2006.</p>
Y-002-013	<p>C. Regional Water Supply King County and Cascade Water Alliance have initiated a regional water supply process that will address, among other water issues, credible long-term demand forecasts, alternative supply options, tributary streamflow needs for fish, use of reclaimed water, and climate change impacts. Initial technical reports on some of those topics will be completed by the end of 2006 and others some time in 2007. The SDEIS should integrate the products of this effort.</p>
Y-002-014	<p>D. Puget Sound Ecosystem The SDEIS should include enhanced discussion of Puget Sound. The prospect of increasing stress on Puget Sound resulting from future growth and climate change make it imperative that the work required to restore and protect the marine ecosystems of Puget Sound be fully embraced by the PSRC. The work of bringing Puget Sound back to a healthy state will enable the ecosystem to support hundreds of species of wildlife, while also serving a critical role in the economic and recreational activities of the region.</p> <p>Below is the Governor's Charge to the Partners creating the Puget Sound Partnership, and a link to the Puget Sound Partnership Interim Report to the Governor:</p> <p>"I am charging the Puget Sound Partnership with the task of engaging a broad cross-section of agencies, tribes and the public to develop recommendations for me, the Legislature and Congress for preserving the health, goods and ecosystem services of Puget Sound, and to help educate and enlist the public in achieving recovery of the Sound by 2020," Gregoire said.</p> <p>http://www.pugetsoundpartnership.org/reports/PartnershipInterimRpt_7-10-063.pdf</p>
Y-002-015	<p>E. Flood Control Population change (distribution and growth) along with climate change impacts have a profound affect on areas that are susceptible to flooding. Population growth and location would result in land cover change, and additional impervious surface areas for all</p>

Y-002-013

PSRC is aware of the progress of other regional water supply processes, including the King County and Cascade Water Alliance efforts. While the issues faced by regional and subregional service providers vary, the VISION 2040 EIS discussion of anticipated impacts and water supply issues facing the region remains consistent with the more detailed studies that are underway. Similar efforts are expected to continue as the region develops the infrastructure needed to sustainably accommodate future growth.

Y-002-014

Additional mention of the Puget Sound as critical habitat has been provided in the Final EIS, and the Puget Sound Partnership program is described in Chapter 2., Environmental Baseline, as well as in VISION 2040.

Y-002-015

The FEIS discusses the impacts of each growth alternative on floodplains and frequently flooded areas. Please refer to section 5.6 for further information. Note that it is not within the scope of this FEIS on VISION 2040 to seek to designate new "regional utilities."

- Y-002-015** alternatives. The impact would affect changes to flood zone flow volumes, rates, and timing.
- First, for the SDEIS, the PSRC should consider mapping frequently flooded areas. This would consist of mapping flooding within the valleys at several frequencies, including the two-year, five-year, and 10-year, 25-year, 50-year and 100-year floodplain boundaries. The relative risk for development across the floodplain could then be readily determined, as well as an annualized summary damage potential for each parcel affected by the various risks.
- At a minimum, the SDEIS should include an assessment of the potential flood risk based on FEMA flood insurance study maps or other best available flood data. The preferred growth distribution alternative, from a flooding perspective, should be the one that encourages growth in those areas outside of the major river floodplains.
- Secondly, the SDEIS should identify and map all levees and possibly designate them as regional utilities. The maps should also note critical resources or land activities within those boundaries. This would provide an assessment of risk related to population/employment locations resulting from changes in flood flow volumes, rates, and timing for various storm events. The Vision 2020 Update should recognize the vulnerability of people and structures located behind existing levees and revetments and assess the impacts of focusing growth in those vulnerable locations.
- Y-002-016** **F. Drainage: Transportation Impervious Surface Area**
The SDEIS should include an expanded discussion on the transport (movement, travel pattern) of goods and services. This would include some measure of goods and or services by type (e.g. fuels, foods, mail, building materials) and volume. It would also include by vehicle type (plane, truck, ship, and rail). This is based on the fact that roadways are an extension of the drainage infrastructure. Any spills, leaks, and contribution of debris to impervious surface areas have impact on receiving waters and possibly habitat areas.
- Y-002-017**
- Y-002-018** Further, we recommend that PSRC include an expanded discussion on emergency service delivery related to major disasters, as it relates to fires, toxic releases, explosions, earthquakes. The discussion should include water delivery and drainage system impacts.

IV. Health Impacts

- Y-002-019** The role of land use planning and transportation systems as determinants of health are well described and explained in the Issue Paper, "What's Health Got to Do with Growth Management, Economic Development and Transportation?" The alternatives most consistent with the concepts and health benefits expressed in the Health Issue Paper are Alternatives 2 and 3. Street networks with high connectivity, transit opportunities, non-motorized trail or sidewalks opportunities, and compact, mixed-use development close to transit are features of the built environment more likely to occur under these types of alternatives than under the Alternatives 1 and 4. However, as noted in the Information Paper, "At The Microscale: Compact Growth and Adverse Health Impacts", air quality and noise levels in high density or intense land use settings

Y-002-016

Given the large regional scale of the project and the broad nature of the decisions to be made balancing a wide range of environmental and public policy factors, a detailed analysis was considered beyond the scope of the VISION 2040 update.

Similar factors influenced the choice of the level of analysis for impervious surfaces, which was conducted at a scale that allowed broad predictions of the amount of impervious surfaces that would be created. The nature of transport on a facility could affect the type or balance of water quality impacts that could occur on certain kinds of facilities, but more detail would not alter the comparative findings for each alternative. In addition, the calculation of impervious surfaces created include more than roads only.

Y-002-017

Comment noted. The FEIS recognizes that runoff from transportation facilities is a major source of water pollution.

Y-002-018

These issues have been noted in section 5.7.3, cumulative effects. Since the location of such events cannot be reasonably determined, a more detailed analysis by alternative would be highly speculative. However, effective planning and response for such events can help to mitigate impacts.

Y-002-019

Comments noted. A text reference linking the discussion of these issues in the Environmental Justice analysis in section 6 has been provided within section 5.9.2.

- Y-002-019** can negatively affect public health. The potential health impacts in these situations largely stem from VMT and vehicle speeds in proximity to residential uses, schools, and workplaces. Additional health impacts related to the development patterns of the Alternatives 1 and 4 are the likelihood that people will become more isolated because of loss of community connections to neighborhoods, recreational activities and geographical areas of interests. Isolation in turn, can lead to poor individual and community health. These health outcomes make these alternatives undesirable.
- Y-002-020** To fully realize all potential health benefits associated with the type of development pattern expected in Alternatives 2 and 3, the SDEIS and/or multi-county planning policies should include a discussion of, and mitigation measures to counter the increased noise levels and degraded air quality associated with high density settings envisioned in the "regional geographies" and/or "regional growth centers." Examples of concepts that should be presented in the SDEIS and multi-county planning policies to mitigate VMT-related noise and air quality impacts are traffic engineering practices; urban design techniques; and noise-reducing construction materials and techniques. The World Health Organization noise program provides additional information about the effects of noise on health (see Public Health attachment). Key to the success of the alternatives 2 and 3, or similar alternatives is mitigating perceived and real problems about the quality of life in future communities and neighborhoods. Controlling noise will be a critical element in ensuring that a compact, mixed-use development patterns is truly a desirable, attractive, and healthy choice for future populations.
- Y-002-021** Another major area of concern is the effect of future land uses and transportation systems on regional food security and food systems. Other planning processes have begun to integrate food security with regional planning and this should be considered in the DEIS as well (see Public Health attachment). In addition, inclusion of local food systems experts and practitioners, such as the Acting Food Policy Council, should be consulted for the SDEIS and development of multi-county planning policies phase of the Vision 2020 Update
- Y-002-022** Other critical aspects of environmentally-based community health that should be addressed in the SDEIS and/or multi-county planning policies are ensuring adequate recreational opportunities, access to non-motorized transportation, public space, access to healthy foods, and connectivity between adjacent neighborhoods. (see Public Health attachment)

V. Environmental Justice

- Y-002-023** **A. General Comments**
The analysis and discussion of Environmental Justice in the DEIS should be commended as this topic is not typically included in environmental planning. It can serve as a primer to those in the broader planning community and DEIS audience who may be unfamiliar with the topic. In particular, the incongruence and difficulties that most environmental justice communities face in terms of where they live (housing), where they work (jobs), and their mode of travel (transportation choices) is well highlighted and generally accurate given the regional planning scale for each alternative in the DEIS.
- The only place in the document that addresses environmental justice deals with minorities and the poor under the definition in federal legislation. Although some consider Tribes

Y-002-020

VISION 2040 has addressed this issue with policies related to regional design, context-sensitive transportation practices, and more. Additionally, public health issues are also addressed throughout the VISION document. Lastly, the FEIS discusses many of these issues as potential mitigation measures.

Y-002-021

This issue was considered during the update process and policy language and narrative are included to support uses that enhance the region's food system.

Y-002-022

VISION 2040 addresses these issues with policies and narrative related to public health, connectivity, and nonmotorized transportation.

Y-002-023

Thank you for the compliments. PSRC recognizes that members of Indian Tribes have specific rights by Treaty and Tribes are considered sovereign nations. PSRC's program to update the VISION has included outreach and involvement with Tribes, especially those who are council members. The existing discussions provided by the variety of FEIS topics, as well as the Environmental Justice section, are appropriate given the non-site-specific focus of the VISION update.

Y-002-023

as minorities (and poor) this isn't their status. The SDEIS should have a place to address Tribal issues and concerns in a spirit of Environmental Justice as the Tribal people do suffer a disproportionate degree of consequences given their reserved Treaty rights. For example, the tribes receive minute amounts of benefits from a majority of development but in the case of salmon and shellfish degradation they shoulder a 50 percent share of the cost.

Y-002-024

B. Suggested Areas of Environmental Analysis to Expand

The environmental analysis needs to be expanded in terms of the impacts that environmental justice communities are likely to experience under all alternatives. The impacts to these populations, which derive in part from built and natural environment conditions, manifest themselves as health disparities. Health disparities occur when certain groups, based on income, race, age, ethnicity or a combination of these factors, bear a disproportionate burden of illness and early death relative to the population as a whole. For example, environments that promote physical inactivity, stress, and poor nutrition contribute to rising rates of obesity, hypertension, and diabetes. Another example, common among environmental justice communities located in industrial areas where land uses generate relatively higher levels of particulates, is that there are also higher rates of respiratory disease and asthma-related hospitalizations.

If environmental justice communities and the health disparities that characterize these communities are to be reduced in terms of their size and location, some type of cumulative impacts analysis is needed. A concept called "total maximum daily load" (TMDL) is used to determine allowable pollutant levels in impaired water bodies. Applied to environmental justice communities, a TMDL-like analysis would call for documenting existing levels of health-diminishing features of the built and natural environments, specific pollutants, and other relevant environmental factors. This information could serve as a baseline against which future planning decisions, land uses, and projects could be evaluated relative to equity and health effects on environmental justice communities. This idea should be further explored as part of the multi-county planning policies that will be included in the SDEIS.

Y-002-025

C. Environmental Analysis and Mitigation Concepts to Pursue

The degree to which the Vision 2020 Update and future planning processes at the sub-regional level can create conditions allowing environmental justice populations to avoid health-degrading land uses and related policies, will determine if the environmental justice populations identified in the DEIS contract or expand. Reducing environmental impacts to these environmental justice communities can be accomplished through addressing the causal roots of health disparities. In particular, the planning and design community will need to address areas where living conditions and land uses are allowed that erode good health through lack of safe and affordable housing; lack of living wage jobs within reasonable commute times; an overabundance of stores specializing in alcohol, tobacco, and low-nutrition foods; a scarcity of grocery stores; a lack of recreational and transportation facilities; and exposure to multiple sources of air, water, and soil pollution.

Y-002-024

Thank you for the suggestion, and PSRC agrees that health disparities among low income and minority populations are an important public policy consideration. However, the analysis suggested is considerably more detailed than would be needed for the consideration of a Preferred Growth Alternative. The FEIS has provided a number of other elements that provide additional information on human health concerns, including the "What's Health Got to Do With It?" and "At the Microscale" papers, which are provided in FEIS Appendix I-F.

Y-002-025

The Final EIS includes some of the additional mitigation measures you have suggested.

Y-002-026

A common experience among environmental justice communities is that they are approached too late in a planning process about topics that appear not to address the environmental conditions most detrimental to their quality of life. The Vision 2020 Update, through mitigation measures and/or multi-county planning policies, should provide the foundation for future sub-regional planning processes to alter this unproductive communication and outreach pattern between government agencies and environmental justice communities. The environmental justice communities need to be approached early on, prior to the scoping process, to learn about the environmental conditions the environmental justice communities consider most relevant and important. The onset of the formal planning process can then be better informed about how to integrate, address, and propose changes to the conditions in environmental justice communities to the extent possible.

VI. Evaluation Criteria for Selecting a Preferred Alternative

(This section refers to Appendix C of the DEIS.)

Y-002-027

A. Overview

Please revise the following bullets:

- Create an efficient land use pattern for provision of infrastructure, facilities, and services, *and to mitigate the effects of climate change and to enhance environmental protection and recovery.*
- *Protect and restore* the natural environment.

B. Environmental Measures

- Please consider adding new subjects for species diversity, ecological integrity, and ecological footprint. King County is available to assist PSRC in drafting potential measures for these new subjects. Further, we question why 'historic and cultural resources' are considered under the Environmental Measures as opposed to a more general heading relating to quality of life or social factors.
- Climate change should be measured as metric tons (2205 pounds per metric ton) to be consistent with national and international accounting principles and not short tons (2000 pounds per short ton). Climate change impacts should also be included in the land use and transportation evaluation criteria and not just in the environmental criteria. The same "Tons of Carbon Dioxide per year" measurement can be applied to land use and transportation.

C. Economic Measures

Please consider adding new subjects for natural resource based industries such as agriculture and forestry.

D. Land Use Measures

Please consider adding land cover as a new subject to be measured.

E. Transportation Measures

Based on our recommendation in Section II, above, the evaluation criteria should include more complete measures of mode split. We recommend that the mode split evaluation not be limited to commute trips and that active transportation (walking and biking) and carpooling (including vanpooling) be included.

Y-002-026

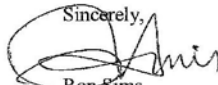
As part of its ongoing environmental justice responsibilities, PSRC conducted additional outreach to these population groups. The results of this work are shown in Chapter 6, and in FEIS Appendix II-C.

Y-002-027

The Regional Council investigated some of the suggestions for additional measures, and the requested additions were determined by the Board to be either not sensitive to growth distribution, more appropriate for monitoring or for analysis at the comprehensive plan stage, or redundant to current measures. Note that some of the titles of the measures were revised to address comments such as this one.

Norman A. Abbott
July 31, 2006
Page 10

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

Sincerely,

Ron Sims
King County Executive

Enclosures (9)

cc: Stephanie Warden, Director, Department of Development and Environmental Services
Pam Bissonette, Director, Department of Natural Resources and Parks
Harold Tanaguchi, Director, Department of Transportation
Dorothy Teeter, Interim Director, Department of Public Health
Kurt Triplett, Chief of Staff
Karen Wolf, Senior Executive Policy Advisor

ATTACHMENT 1

KING COUNTY DEPARTMENT OF TRANSPORTATION DETAILED COMMENTS

- Y-002-028** | **Develop an alternative strategy.** A land use vision that continues to focus development on centers is warranted by the economic and cultural value of strong cities. It is also key to achieving strong transit use. A revised vision should be developed that continues the region's focus on centers development, but that addresses the shortcomings uncovered by the Vision 2020+20 analysis. The vision should be based on a coherent strategy that maximizes short-distance commuting within subareas, and reliance on transit to provide regional access to major centers.
- Y-002-029** | A focus on "regional" problems and solutions has reinforced the notion that the most important challenge is to accommodate long distance trips in regional corridors. To minimize congestion, VMT and greenhouse gas production would require revisiting the regional transportation plan.
- A land use/transportation strategy meeting these objectives could have the following attributes:
- Y-002-030** | • **Develop a "visual" vision and reasonable explanations for analysis results.** It is difficult to draw conclusions from the analysis. Help is needed to visualize what is proposed. For example, what would the effect be on Seattle neighborhoods of a 45% increase in population? It is also difficult to understand and learn from the results without having a plausible explanation for the dynamics that are in play.
- Y-002-031** | • **Promote short-distance commuting rather than regional travel.** The resources required to promote universal access throughout a four-county region are not available or sustainable. Reducing both congestion and greenhouse gas emissions requires lowering the growth in the number of vehicle miles traveled (VMT). A key strategy to accomplish this is to promote policies and facilities that encourage walking, biking and transit use, and commuting to nearby activity centers when possible.
- Y-002-032** | • **Continue the focus on centers.** The focus on jurisdictions in the Vision 2020+20 analysis is useful, but suggests a retreat from a policy of focusing growth in centers. This may be more a matter of how the analysis is presented than its intent. Major centers require broader regional access than other places, and greater effort is needed to ensure that transit use will account for the majority of this growth. The revised centers plan should combine attributes of the Metropolitan Cities and Larger Cities scenarios. It needs a stronger "vision" statement about the nature and hierarchy of centers. Seattle will remain the regional center, but should Bellevue develop into a dominant Eastside center with a more intensive transit and pedestrian identity? Should a subarea center emerge within South King County, and why or why not? Economic and cultural factors should drive this decision, not just transportation.
- Y-002-033** | • **Freeway management and pricing are key elements.** One way to reduce travel is to allow congestion to worsen – but there are unpleasant side effects. When congestion worsens, the effect is to limit the range that individuals can travel within. The downside of this approach is that it worsens air quality at congestion points and increases the frustration and cost to people who need to make longer distance trips or move freight through the region. The alternative is to manage freeway travel more intensively, including using pricing to minimize discretionary and low-value travel, and developing managed express lanes for reliable transit and other high-value trips. Unless the HOV system can be managed reliably, transit will be effective for only longer distance regional trips.
- Y-002-034** | • **Housing policy is also a key element.** One factor that exacerbates the mismatch of jobs and housing and encourages long trip-making is the lack and poor distribution of affordable housing. As housing costs soar, more low and moderate-income families are forced to commute over

Y-002-028

VISION 2040's Regional Growth Strategy includes a centers focus.

Y-002-029

Destination 2030 is currently being updated.

Y-002-030

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.

Y-002-031

This issue is addressed in the multicounty planning policies within VISION 2040.

Y-002-032

See response to Comment #27.

Y-002-033

The multicounty planning policies and the update to Destination 2030 address this issue.

Y-002-034

The multicounty planning policies address this issue.

ATTACHMENT 1

- Y-002-034** | longer distances. A centers-based strategy that stresses local commuting must also address the distribution and supply of affordable housing.
- Y-002-035** | • **Greater focus needed on local streets and arterials.** The focus on regional transit and highway projects has caused too little attention to be paid to local streets and transit needs.
- Y-002-036** | **Regional Environmental Baseline.** The "Regional Environmental Baseline" section of the DEIS and particularly the discussion on environmental planning that includes requirements for integrated systems, management at a continuum of scales, using an interdisciplinary approach, addressing landscape-scale ecological processes and incorporating adaptive management is impressive. By doing so, the document has set the stage for recommending an enhanced environmental role for PSRC in the future. The integrated environmental framework discussed in this document could provide a foundation for the creation of a regional environmental strategy. PSRC is in a position to contribute in a very meaningful way to the environmental health of the region by taking on this role. In doing so, they should avail themselves of the work that has been done in the area of adaptive management around monitoring roadway mitigation sites by both King County Roads and WSDOT. These agencies have been working for quite some time on transportation mitigation monitoring and could provide excellent specific examples to PSRC.
- Y-002-037** | **Develop a Regional CTR Element for Regional Transportation Plan to Inform Local Plans.** Through a parallel process to the 2020 + 20 plan, the PSRC must develop a regional CTR Plan. The regional plan should use the regional modeling to help jurisdictions establish realistic SOV numerical goals over time (5, 10, 15 year goals) for specific center trip reduction programs and policies.
- **Update 5.3.1 (Affected Environment) to Include Regional CTR Plan Activity.** The final EIS should describe the PSRC role in developing the regional CTR plan called for by the 2006 CTR redesign and its part in the overall Plan
 - **Regional Fund Development.** Develop this promising idea further with more specific language about how Federal Grant funds could be programmed to better support the ongoing development of a regional fund that could help support regional fund uses such as CTR.

Y-002-035

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. This issue will be addressed in the Destination 2030 Update.

Y-002-036

Thank you for your comment. VISION 2040 action calls for exploring PSRC's role in regional environmental planning.

Y-002-037

The CRT plan is included in Destination 2030.

ATTACHMENT 2

KING COUNTY CLIMATE CHANGE RECOMMENDATIONS

We recommend that Puget Sound Regional Council (PSRC):

1. Create a fourth board – in addition to land use, transportation and economic development – for “Climate Change and the Environment”
2. Establish reduction of vehicle miles traveled (VMT) as the primary metric for ensuring benefits from climate change, air quality, efficient transportation, active living, land use plans and preservation of open space
3. Developing project-level criteria for approving transportation projects and land use plans

Y-002-038

Climate Change Impacts in Puget Sound

The University of Washington’s Climate Impacts Groups (CIG) is internationally-recognized for their work on predicting climate change impacts. The CIG currently estimates that warmer temperatures will lead to a 50 percent loss of average snowpack in as little as 50 years. By the end of this century, the Cascade and Olympic Mountains may lose as much as 80 percent or more of their average snowpack. This snowpack is the primary source of water supply for King County and the Puget Sound region. The loss of snowpack will cause severe impacts on fish, farms, forests, hydropower, drinking water supplies, skiing and other recreational industries.

An increase in severity of storms will affect flood management and zoning, wastewater treatment (combine sewer overflows) and stormwater management. Sea level rise will affect coastal properties and zoning and well as wastewater outfalls. Greater temperatures will increase health effects from increase ozone, heat-related deaths, and increase of vector borne diseases such as West Nile. Increasing temperatures also will lead to greater infestation of forest pest such as the pine beetle that ravaged forests in British Columbia.

The magnitude of climate change impacts in the Puget Sound region are so profound that they go well beyond environmental impacts and will lead to fundamental social and economic changes. We believe it is incumbent upon the PSRC to play a leading role in:

- Reducing the sources of greenhouse gas (GHG) emissions that cause these impacts, and
- Preparing for the level of impacts that we now know are inevitable.

In 2004, the Puget Sound Clean Air Agency (PSCAA) convened a precedent-setting Climate Protection Advisory Committee to make recommendations to reduce GHG emissions within the four-county region of PSCAA and PSRC. Below is a summary of the land use and transportation recommendations which are in keeping, if not directly at least in spirit, with the King County recommendations for addressing climate change. The summary of the recommendations are:

“Reduce motor vehicle miles traveled: Reducing overall vehicle miles traveled and providing better alternatives to single-occupancy vehicles are both existing regional priorities and a crucial part of any effective strategy for reducing global warming emissions. Key actions:

- Establish a vehicle miles traveled reduction goal.
- Implement a series of transit, land-use, and demand reduction strategies.
- Incorporate climate protection policies and goals into regional transportation and land-use planning, such as described in the Puget Sound Regional Council’s Destination 2030 plan.”

More information about these recommendations are available at:
<http://www.pscleanair.org/specprog/globalim/cpsp/index.shtml>

Y-002-039

Recommendation #1 – Establishing a “Climate Change and Environment” Board at PSRC

Each year that we allow “business as usual” to persist, we allow for more costly impacts to occur. Each year that we delay, we impose greater economic costs for more drastic reductions in GHG emissions

Y-002-038

VISION 2040 policies and actions call for all of these to either be done or explored.

Y-002-039

This recommendation will be explored by PSRC as part of an action to determine the Regional Council’s role in regional environmental planning.

Y-002-039

ATTACHMENT 2

that will be required later. Each year that we delay, the cost of preparing for and adapting to climate change will increase.

Y-002-040

It is in our financial interests to get ahead of any future regulatory requirements and to create insurance against inevitable climate change impacts. There is a growing consensus from climate scientist across the globe that in the next ten years we will reach a “tipping point” of irreparable harm to many of our natural and built environments. The near-term loss of snowpack may be inevitable so now it is incumbent upon us to prepare for this change and minimize our losses.

The creation of this fourth PSRC Board will allow for the prudent planning and accountability that is necessary for mitigating GHG emissions and preparing for climate change impacts. We recommend that the structure for this new board be similar to the structure of the Economic Development Board.

We recommend that climate change be the primary focus on this new Board. What we already know about environmental impacts from climate change will trump some of the worse case scenarios anticipated from a host of other environmental impacts. In fact, much of the climate change impacts will create their own environmental impacts – such as reduction of regional water supply – or simply subsume other environmental concerns – such as creating greater conditions for ground-level ozone. Similarly, initiatives that will be necessary for reducing GHG emissions or preparing for climate impacts will provide benefits for other environmental goals, such as reducing traditional criteria air pollutants or preserving open space that preserve forests that absorb GHG (specifically carbon dioxide) emissions.

Puget Sound Transportation Accounts for the Majority of GHG Emissions

In the United States, the GHG emissions from transportation account for about 31 percent of total U.S. emissions. In the four counties of PSRC, total on-road and off-road transportation accounts for 62 percent of the total regional GHG emissions; that is twice the national average.

The Washington State Legislature has passed two of the strongest standards to reduce GHG emissions from vehicles. In 2005, the Legislature passed the California tailpipe standards that will provide a 30 percent reduction in GHG emissions. Only eight other states have adopted such standards. This year, the Legislature passed a biofuels standard, requiring 2 percent ethanol and biodiesel in all gasoline and diesel, respectively. This may be ramped up to 10 percent and 5 percent respectively. Only seven other states have such standards.

The implementation of these initiatives will take time. For the tailpipe standard, major automakers have until 2016 to fully phase in the 30 percent reduction. Then there is an average of a 16-year vehicle turnover rate, pushing complete implementation out until 2032. The fuels standards will add modest additional GHG reductions to the overall transportation emissions profile.

While these two initiatives are landmarks compared to most state requirements, the growth of vehicle miles traveled (VMT) in the four-county PSRC region may overwhelm these benefits. The result may be that, VMT growth will erase the benefit of these landmark initiatives and instead of reducing overall emissions, we will have the same emissions level in 2032 that we have now.

Y-002-041

Recommendation #2 – Establishing VMT Reductions as the Primary Metric for Climate, Air Quality, Water Supply/Quality, Land Use, Health and Environmental Benefits

We cannot simply slow the growth in VMT, but we must level it off and begin to reduce VMT. The best we can do to reduce GHG emissions from vehicles and fuels may not even keep up VMT growth. Growth in VMT has often been associated with economic growth, and there are some strong linkages. However, continued growth in VMT will create many economic and environmental impacts that

Y-002-040

Thank you for the background information. Your comments have been noted.

Y-002-041

VISION 2040 policy addresses this issue.

Y-002-041

ATTACHMENT 2

undermine long-term prosperity and sustainability. In fact, reductions in VMT, can now be linked to a host of land use and transportation benefits, including:

- Reduced GHG emissions
- Reduced oil dependence
- Preservation of open space
- Reduced development of inefficient housing patterns
- Greater mixed used development and transit oriented development
- Greater active living with more walking and biking
- (need to add others)

Y-002-042

We recommend that the following policy statement to be adopted as a governing principle in the development of the Vision 2020 Update and in the Destination 2030 update. We further recommend that this broad policy statement be used as the starting point from developing evaluate criteria for transportation project and land use issues: "The Puget Sound Regional Council recognizes the long-term economic and environmental benefits from reducing overall vehicle miles traveled in our four-county region and will devise criteria to evaluate transportation projects and land use plans."

Recommendation #3 – Developing project-level criteria for approving transportation projects and land use plans

Reductions in VMT can and should become a fundamental measure of economic and environmental health. Greater details for different criteria need to be defined for specific projects and land use plans, and how these criteria benefit climate change, land use, transit, public health and other sustainability objectives. Listed below are some ideas on how we may be able to implementation the broad principle state above. Some climate change needs, such as regional water supply issues, will not be able to be fully captured using VMT reductions alone.

Y-002-043

GHG reductions

The U.S. Environmental Protection Agency has established VMT as a fundamental component for estimating GHG emissions from passenger vehicles (<http://www.epa.gov/OMS/climate/420f05004.pdf>). The U.S. Department of Energy compiles the list of GHG reduction initiatives under a voluntary reporting program for U.S. electric utilities. Reduction on VMT is one of the primary tools employed by public and private utilities that sought to reduce the GHG emissions (<http://www.eia.doe.gov/oiaf/1605/vr99data/chapter3.html>). In the U.S. Department of Transportation's review of programs that are intended to reduce GHG emissions, VMT is a fundamental component of the state's basis for calculating GHG emissions. USDOT further notes that "In contrast with trends in other air emissions, greenhouse gas emissions from transportation continue to rise, in large part because travel growth has outpaced improvements in vehicle energy efficiency." (<http://climate.dot.gov/trans.html>)

VMT is recognized as the essential measurement tool for tracking transportation-related GHG emissions and can be used to establish specific criteria for PRSC-approved transportation projects. We recommend one initial idea to be considered. In 2004, the Washington State Legislature passed a requirement that any new power plant mitigate 20 percent of its life-time GHG emissions. A similar requirement could be created for transportation projects that increase VMT/GHG emissions. If a transportation investment is calculated to increase VMT, then a criteria can be developed to estimate the life-time GHG emissions from the investment.

There are issues to resolve such as what defines "life-time" for a road and how to account for interim congestion relief benefits – but the calculation can be made that accommodates relevant concerns. With

Y-002-042

This issue is addressed in VISION 2040. The Destination 2030 update will explore the next steps.

Y-002-043

Thank you for providing additional information on climate change.

ATTACHMENT 2

Y-002-043

this formulaic approach, GHG mitigation fees can be assessed for any new project. Funds from the GHG mitigation – just as funds from new power plant developments – can be directed to project that reduce GHG emissions. However, we would recommend that the PSRC direct any such mitigation fees to projects within the four counties that reduce VMT. This transfer of funds would be designed to ensure that funding levels are not re-allocated so as to undermine the purpose of achieving greater VMT reductions.

Using the state power plant legislation as a model for transportation projects, initial estimates of GHG mitigation fees on transportation projects that increase VMT shows that the overall cost of the project remains small, probably less than one or two percent. This is due, in part, because the state law definition of costs per ton of GHG emissions is extremely low compared to other voluntary U.S. markets and mandatory European GHG trading schemes. Nonetheless, the precedent value is extremely important and will help the region to recognize and begin to internalize the cost of climate impacts from transportation.

ATTACHMENT 3

CLIMATE CHANGE AND PUBIC HEALTH—DRAFT

Climate change is not just an issue for the forests, fish, and wildlife in the four county region that PSRC covers. Because of our dependence on the ecological and natural systems that are part of our food systems, drinking water sources, and other fundamental parts of our economy, we too are being and will continue to feel the effects of global warming. Public health officials and climate scientists anticipate that individuals and populations will experience the health effects of climate change primarily through certain types of diseases, weather events, and temperature extremes as summarized below.

Temperature-related Illnesses and Deaths

One of the direct ways in which climate change will affect health is through increased temperature. Heat extremes and more prolonged high temperatures are the main factors. Regions unaccustomed to heat waves and where high temperatures are infrequent are likely to suffer the most. Puget Sound cities and communities comprise one such region. Certain populations will be most vulnerable to high temperatures and include those with underlying bad health, the young, the old, and the poor. The “heat island” effect is a confounding factor for all populations because of the relatively higher temperatures in urban and some suburban areas associated with extensive impervious area and lack of a tree canopy.

Health Effects Related to Extreme Weather Events

Injury and death can occur when weather-related disasters such as floods and hurricanes strike. Examples of the most likely types of natural hazards in the Puget Sound region that will result in injury and death are from flooding and landsliding. Secondary health effects can also accrue in the wake of extreme weather events. Mental health, in the form of post-traumatic stress disorder, declines when people and business temporarily or permanently lose their homes, property, and livelihoods. Physical health in water-related disasters often deteriorates because of water-borne parasites and diseases or mobilization of soil contaminants as occurred with Hurricane Katrina. The mental and physical health of populations will also be affected in accordance with the social and financial networks available to families and individuals and the resilience and the recovery capacity of the municipality in which they live and work.

Air Quality-related Health Effects

Air quality will affect health because of the way weather conditions, from wind patterns to ambient air temperature, affect precursors of pollutants and the pollutants themselves. Combining weather dependent factors of air quality with human contributions including auto emissions, industrial particulates, and other allergens will compound the air quality health effects of climate change. For example, higher temperatures are associated with stagnant air circulation patterns, which in turn lead to ground-level ozone. Ozone can worsen respiratory diseases because it damages lung tissue, reduces lung function, and makes the lungs susceptible to other irritants.

Additional ways in which air quality will interact with climate change to affect health are through changes to native vegetation communities and urban forests. Pollen production and a longer flowering period leading to a longer allergy season is an example of a possible indirect health effect. For those with asthma, especially children, if allergens increase or the allergy season increases, their respiratory health will be more compromised.

Much about the air quality effects of climate change are difficult to know with certainty because of the various sources of air pollutants, microclimatic conditions, and many other factors. In Puget Sound, perhaps the biggest areas of concern are related to how higher temperatures will affect pollutants, location and type of emission sources, and mold and pollen –based allergens.

Water- and Food-borne Diseases

ATTACHMENT 3

The main way in which water and food-borne diseases will affect health is linked to how weather and climate conditions affect the aquatic habitats and life cycle of the pathogens themselves. The factors most important in determining the geographic distribution and persistence of these pathogens include precipitation levels, temperature, salinity, humidity, and wind. Given the setting of Puget Sound cities and communities, high levels of water-based recreation, and shellfish and fish consumption, this region is likely to face higher water and food-borne disease risks than other regions of the state and nation. Examples of the potential pathogens that could increase in number, geographic area, or persist for a longer time period include an estuarine bacterium (*Vibrio vulnificus*) linked to shellfish consumption that can cause death, and a protozoan (*Giardia lamblia*) that causes minor to severe gastrointestinal distress.

One of the climate predictions for the Pacific Northwest is that precipitation will occur more as rain than snow. This type of change is likely to increase combined sewer overflows which would likely pose additional risks to public health from sewage-related pathogens.

Zoonotic Diseases

Zoonotic diseases are those that can be spread from animals to humans. Weather and climate factors influence animal-borne diseases through affecting the animal's food supply, population dynamics, and habitat availability. The interplay of these factors on the particular animal species and disease transmission are unique. For example, the already high precipitation levels in the Puget Sound region and the prediction that they will go higher under a changing climate scenario are likely to influence mosquito populations and the diseases they transmit (e.g., malaria, West Nile virus, and encephalitis). Temperature is another factor that influences mosquito populations and so it will be important to understand the linkages between the various factors in preventing disease transmission.

Leptospirosis and hanta virus are examples of diseases that require vertebrate vectors, typically a rat or wild mouse species. Leptospirosis is also carried by wildlife tolerant of urban conditions (e.g., raccoons) and some domestic animals (e.g., dogs). The leptospirosis bacterium is shed through urine and can persist in the soil. Transmission to people can occur if the bacterium finds its way to natural water bodies that are used for swimming or to floodwaters that come in contact with people. To the extent that climate change increases food sources and habitats for vertebrate vectors in the Puget Sound region, people are likely to face a higher risk of exposure to certain diseases.

Additional Areas Affecting Public Health

Economic disruption due to climate change and variability is also a possibility in the future. How this plays out with respect to our social, mental, and physical health is unpredictable. Further scenario building about the health effects stemming from economic disruption specifically in the Puget Sound region is worth exploring. Another area in need of additional research is how climate change will influence our food systems. Food systems include where food is grown, how it is distributed, crop choices, soil suitability, and fertilizer inputs. Our health is intimately connected to our ability to grow and choose health sustaining-foods.

Adapting and Responding to Climate Change

People, businesses, communities, and neighborhoods can all prepare for a changed and changing climate. The first step in preventing or avoiding adverse effects is to have a broad base of public knowledge about the nature of climate change and what we can expect. Simultaneous with the information phase is implementing adaptive actions to protect public health. This can occur primarily through the maintenance and improvement of public health surveillance, response, and communication systems in combination with technological, legislative, land use, and individual behavioral changes. More work is needed in these areas to craft the changes that will be necessary and to initiate the work ahead.

ATTACHMENT 3

Y-002-043

References

1. National Assessment Synthesis Team. *Climate Change Impacts on the United States: The Potential Consequences of Climate Variability and Change*. Report for the US Global Change Research Program. Cambridge University Press, Cambridge UK, 620pp., 2001.
2. Kovats, R. S. and Haines, A. *Global climate change and health: recent findings and future steps*. Canadian Medical Association, 172 (4), 2005.



KITSAP COUNTY
DEPARTMENT OF COMMUNITY DEVELOPMENT

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July 28, 2006

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
1011 Western Ave., Ste. 550
Seattle, WA 98104-1035

RECEIVED
AUG 02 2006
PUGET SOUND REGIONAL COUNCIL

Dear Mr. Abbott:

Thank you for the opportunity to comment on the Puget Sound Regional Council's DEIS for the update to Vision 2020.

- Y-003-001** Kitsap County has been deeply involved with its own 10-year update to its Comprehensive Plan, so we appreciate the importance of the work PSRC is doing regarding the Vision 2020 Update. However, our involvement with our 10-year update has meant the County has not had ample time to study the DEIS in detail. Therefore, our comments at this time are general in nature. In addition to the following comments, the County expects to submit specific comments in the next couple of months and requests that those comments also be taken into consideration during PSRC's staff and policy board discussions.
- Y-003-002** In general, the Kitsap County Department of Community Development (DCD) wishes to emphasize the importance of continuing the policies supporting local governance and control of planning decisions. While the department appreciates PSRC's roles and responsibilities as the regional planning agency and recognizes the need to follow state statutes regarding growth management, it does not wish to see additional levels of planning "certification" or approval. Specifically stated, DCD does not want goals and policies of the update to be mandates—the department finds advisory policies and guidelines to be the best conveyances to help identify and achieve long-range goals and objectives.
- Y-003-003** Furthermore, DCD wants to make sure that any "growth scenario" recognizes the County's unique characteristics: limited transportation infrastructure and dependence on ferries for movement of people and goods; a geography more akin to an island than mainland; historic relationship with the Puget Sound Naval Shipyard and the Navy Base; and the rural and small community characteristics defining much of the county. The department recognizes the important and multifaceted role PSRC has in helping to shape regional ecosystems, transportation and economies management. Further, we appreciate the complex tasks of improving or creating a regional and interconnected framework to address

Y-003-001

Comment noted.

Y-003-002

VISION 2040 respects local control. As a membership organization, the members govern the Regional Council. VISION 2040 provides regional agreement and guidance that helps local governments achieve objectives that they cannot accomplish working alone (such as the designation of Regional Growth Centers).

Y-003-003

The Preferred Growth Alternative combines many of the best elements of the other alternatives published in the Draft EIS, including the Growth Targets Extended, which is based on currently adopted plans. The PGA seeks to bend trends, and result in a growth pattern that is both ambitious and achievable. Also, the Preferred Growth Alternative builds upon local plans. Further, implementation of the PGA will be accomplished through local plans, which provides the opportunity to ensure that the regional VISION is implemented in a manner responsive to local characteristics.

Y-003-003

issues that otherwise cannot be addressed in isolation. However, it is important that PSRC understand the grave desire by the County and its associated jurisdictions to operate under a "self-governance" principle to the greatest extent allowable under law.

Again, thank you for the opportunity to comment. Kitsap County looks forward to continuing discussions on the Vision 2020 Update.

Sincerely



Jim Bolger
Assistant Director

Cc: Commissioner Jan Angel
Commissioner Chris Endresen
Commissioner Patty Lent
Cris Gears, County Administrator
Linda Bentley, Senior Planner, Community Planning


Kitsap County Department of Public Works

614 Division Street (MS-26), Port Orchard, WA 98366-4699

R. W. Casteel, P.E., Director

July 31, 2006

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

Dear Mr. Abbott:

Thank you for the opportunity to comment on the Vision 2020 Update Draft
 Environmental Impact Statement.

Y-004-001

Transportation is one of the key topics to be addressed in the V2020+20 and Destination 2030 Updates. Kitsap is unique in that the county has a limited number of access points into the area, four of which are ferry terminals which serve to transport workers to employment centers in King and Snohomish Counties, two bridges to Jefferson and Pierce Counties and a land route to Mason County. The net result is a tremendous impact on our road network serving these facilities.

Y-004-002

While the Draft EIS addresses Economic Development, I would like to see a more extensive analysis of the jobs/housing balance in the discussions. Realizing that it is critical that the county make a substantial effort to attract business and industry, I feel it is also the role of the Regional Council to develop policies and guidelines that encourage distribution of employment throughout the region. Such an action will help modify the traffic patterns within and into the county and may substantially reduce the number of trips into highly congested corridors.

Yours truly,

A handwritten signature in dark ink, appearing to read "R. Casteel".

Randy Casteel, PE Public Works Director

Cc: Commissioner Jan Angel
 Commissioner Chris Endresen
 Commissioner Patty Lent
 Chris Gears, County Administrator
 Jim Bolger, Assistant Director, Community Development
 Jon Brand, PE, Assistant Public Works Director
 Greg Cioc, Transportation Planner III

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Y-004-001

Thank you for your comment reiterating the importance of bridges and ferries to Kitsap County. The Final EIS discussion of impacts has been updated to note the typical issues that ferry terminals and other major facilities face.

Y-004-002

The process to develop VISION 2040's Regional Growth Strategy was based on an analysis of, among other issues, promoting a closer balance between housing and jobs at the regional geography and county levels. This involves adding housing to job-rich areas and adding jobs to housing-rich areas. Also, VISION 2040 contains multicounty planning policies that recognize the importance of creating a job/housing balance and connections between housing areas and employment areas.



Pierce County

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July 31, 2006

Norman Abbott, Director of Growth Management Planning
SEPA Responsible Official
Puget Sound Regional Council
1011 Western Avenue
Seattle, WA 98104

Dear Mr. Abbott:

Subject: Vision 2020 Update Draft EIS

Y-005-001 Thank you for the opportunity to review and comment on the Vision 2020 Update Draft Environmental Impact Statement (EIS). The Draft EIS reflects an enormous amount of research by the Puget Sound Regional Council (PSRC) staff and leaders and presents several interesting alternatives for future growth. We appreciate the amount of time and preparation that has gone into this document and look forward to further discussion and debate as the region develops a vision for 2040.

Y-005-002 General Comments:

1. The regional geographies contained in the Draft EIS offer a reliable baseline of information providing a comparative analysis of various growth distributions and associated impacts. Pierce County anticipates a preferred alternative will be developed using the information presented in the Draft EIS and will most likely result in a hybrid of the regional geographies but is not likely to be a strict adherence to one of the specific geographies presented. We recognize the development of a preferred alternative will require further discussion, research, and analysis. We look forward to working with our local jurisdictions and the larger region toward developing a preferred alternative.

Y-005-003 2. The analysis of the Growth Targets Extended strongly points to the need to re-think our current direction and the implications of accommodating 1.7 million more people under our current growth plans. As stated on page 5.1.13, "Growth Targets Extended reflects the greatest discrepancy between where future job growth and population growth are being directed, which is reflected in the larger increases in average distances between residences, work and other destinations." In developing a preferred alternative we must form realistic solutions that can be supported with cost effective infrastructure. We must be cognizant of the realities of financing the current development pattern in terms of land base and transportation needs and develop

Y-005-001

Thank you.

Y-005-002

As suggested in your comment, the Preferred Growth Alternative is a hybrid of the alternatives studied in the Draft EIS, and was developed with the assistance of local government staff.

Y-005-003

Comment noted regarding your concerns about the Growth Targets Extended alternative. Further, the Preferred Growth Alternative has been structured to address issues such as job-housing balance, and builds upon the existing regional growth centers designations. Lastly, the PGA represents a focused growth pattern that is cost effective.



Y-005-003	solutions to ensure we are not wasting financial or other resources. Development of a preferred alternative will require each jurisdiction to seriously consider and analyze the regional centers, growth targets, and planned infrastructure improvements currently in place.
Y-005-004	<ol style="list-style-type: none"> 3. The preferred alternative must ensure land use, transportation, and employment is inextricably linked; ensuring population growth is supported with available, family-wage jobs and transportation systems that move people efficiently. 4. Pierce County strongly suggests the preferred alternative ensure employment opportunities are distributed evenly across the region. We cannot continue to concentrate major employers in the Seattle and King County region without major impacts to our transportation system and growth patterns. 5. The adopted vision and policies need to be supported through implementation mechanisms including funding. The role of state agencies and special districts should also be recognized and brought into agreement on implementation of a regional vision.
	<u>Specific Comments:</u>
Y-005-005	<ol style="list-style-type: none"> 1. The table on page ES.7 does not appear to be consistent with the surrounding alternatives maps and is not consistent with the maps on page 4.21. The table and text describe the Growth Targets alternative as distributing 13% population to the rural area. This does not appear to be reflected in the maps.
Y-005-006	<ol style="list-style-type: none"> 2. It is unclear why under the Growth Targets alternative, rural employment is the lowest at 3% while the other alternatives contain 5-10% rural employment growth (table ES.7).
Y-005-007	<ol style="list-style-type: none"> 3. In the Population and Employment section and throughout other areas of the document, it is assumed that unincorporated UGAs provide "a significant amount of lower density single family housing." Pierce County is currently working with other local jurisdictions to identify buildable lands and ensure all jurisdictions are planning for and accommodating expected population. However, in general Pierce County allows higher densities than some local cities. As a preferred alternative is developed, any analysis must consider the data for each jurisdiction as it applies.
Y-005-008	<ol style="list-style-type: none"> 4. The Draft EIS consistently demonstrates the Metropolitan Cities and Larger Cities alternatives as resulting in more concentrated, easy to serve growth patterns. More discussion is needed to identify how this growth pattern would result. Simply allowing higher densities would not necessarily direct growth out of unincorporated UGAs and into concentrated areas. How would these alternatives be achieved? Would growth need to be limited in other areas such as unincorporated UGAs or smaller cities?

Y-005-004

VISION 2040 policies support family-wage jobs. Also, the policies and Regional Growth Strategy call for a closer balance between jobs and housing including an increased share of employment growth to metropolitan and core cities outside King County to address some of the issues regarding cross-county commuting.

Finally, VISION 2040 actions call for collaborative work at the regional level to seek to create additional resources for infrastructure.

Y-005-005

The maps are a combination of population and employment, and therefore present combined "activity units." Growth Targets Extended is based on an extension of currently adopted targets. For background data and information on the Preferred Alternative (and the other alternatives), see FEIS Appendix I-A.

Y-005-006

Population and employment growth in the Growth Targets Extended alternative are based on existing plans. The text on the preceding page explains this, and more information can be found in FEIS Appendix I-E.2.

Y-005-007

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. Further, recognize that implementation of VISION 2040 and the PGA will be accomplished through local plans, which provides the opportunity to ensure that the

Mr. Norman Abbott
Puget Sound Regional Council
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Page 3

Y-005-009

5. While the document does a good job of considering the impacts of distributing growth across the landscape, there is not much discussion or analysis of the actual populations that would be distributed. The implications of an aging population and the downsizing of households have further impacts on growth distribution, the need for services, and the ability to finance services. This should be further discussed as the preferred alternative is analyzed.

Thank you for the opportunity to comment. We look forward to reviewing and commenting on both the Supplemental EIS for the Multi-County Planning Policies as well as a more in-depth analysis of a preferred alternative. Again, we look forward to further discussion and development of the preferred alternative. Please call me at 253.798.2722 you have any questions.

Sincerely,



C. E. "Chip" Vincent
Advance Planning Manager

CK:CEV:KF:vll

FILE:TRANSPORT\PSRC DEIS 2040.doc

cc: Chuck Kleeberg, Director, Planning and Land Services
Kimberly Freeman, Senior Planner, Advance Planning
Karen Goon, Special Assistant-Transportation, Executive Office
Jesse Hamashima, Transportation Planning Supervisor, Public Works & Utilities
Rob Allen, Economic Development Specialist, Economic Development
David Swindale, Chair, Growth Management Coordinating Committee

regional VISION is implemented in a manner responsive to local characteristics and plans.

Y-005-008

VISION 2040 addresses these issues with policies that seek to implement the Preferred Growth Alternative. Note that it is also through local plans and countywide planning policies that the VISION will be implemented. This discussion has been added to both VISION and the Final EIS. As noted in your comments, to be successful, actions will be needed to both accommodate and limit growth.

Y-005-009

The Final EIS discussion of trends in section 5.1.2 has been updated to note the major demographic shift that will occur with the aging of the "baby boomer" population. This discussion has also been added to the beginning of VISION 2040.



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July 31, 2006

Norman Abbott PhD,
Director of Growth Management Planning,
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RE: PSRC 'VISION 2020 Update' Draft Environmental Impact Statement

Dear Dr. Abbott:

Snohomish County welcomes the opportunity to comment on the 'Vision 2020 Update' Draft Environmental Impact Statement (DEIS). The county recognizes the considerable challenges that the Puget Sound Regional Council (PSRC) faces designing options for managing the considerable growth the region will experience over the next 40 years. The county appreciates and supports the work of the PSRC to design both an inclusive plan and an inclusive public process.

The county has managed considerable growth over the last number of years and has successfully completed a recent update to its Comprehensive Plan. In submitting these comments to the PSRC the county hopes to share its experience with its regional partners.

As a member of Snohomish County Tomorrow (SCT), the county has participated in the development of the comment letter submitted by SCT, and supports its content. The comments included in this additional letter serve either to underline sentiments included in the SCT letter or represent additional county sentiments not included in the SCT letter. Snohomish County asks that PSRC consider the following comments in designing a preferred alternative for growth distribution, and assessment of impacts in the SDEIS:

Y-006-001

- 1. Balance future job growth and housing growth at the county level and support a prosperous economy:** Snohomish County is committed to economic development. Currently over 103,000 residents leave Snohomish County each day for jobs in King County. The portion of the region's forecasted employment growth to 2040 that is allocated to Snohomish County should reflect the 'VISION 2020' goal of reducing the current discrepancy between where future job growth and population growth occurs in the region. The Growth Targets Extended alternative shows the greatest discrepancy between the location of future job growth and population growth. The preferred countywide 2040

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recycled paper

Y-006-001

VISION 2040's regional growth strategy is based on promoting a closer balance between housing and jobs at the regional geography and county levels. This involves adding housing to job-rich areas and adding jobs to housing-rich areas. Also, VISION 2040 contains multicounty planning policies that recognize the importance of creating a job/housing balance and connections between housing areas and employment areas. The Regional Growth Strategy calls for an increased share of employment growth in major cities in Kitsap, Pierce, and Snohomish counties.

Y-006-001	employment allocation should instead reflect an attempt to create a more balanced geographical distribution of future job growth and housing growth to support economic growth, reduce sprawl, stem commuting, cut pollution, and to preserve resources. This should include allocating a larger share of regional job growth to south Snohomish County to support economic development.
Y-006-002	2. Preserve resource lands: We commend PSRC for its history of recognizing the importance of resource lands. Preservation of Snohomish County's agricultural, mineral and forest lands must be supported in the preferred growth alternative. The rewards reaped from the continued presence of a viable resource industry in the county are recognized and embodied in the Comprehensive Plan policies. Care must be taken not to unravel years of work by diverse interest groups to reach agreement that resource lands and uses are a fundamental part of the fabric of Snohomish County and must be protected for current and future generations.
Y-006-003	3. Acknowledge and plan for the unique opportunities in the Southwest Urban Growth Area in Snohomish County (SWUGA): Snohomish County's cities and unincorporated areas in the SWUGA may be unique in the region and the opportunities offered by the area for accommodating increased growth should not be overlooked in developing the preferred alternative. The unincorporated SWUGA is a large, centrally located area lying directly in the path of high density urban development spreading north from King County into southwest Snohomish County and Everett along existing transportation corridors. These characteristics warrant separate treatment of these areas in the PSRC's regional geography approach for the Vision 2020 update. To lump the unincorporated UGAs into a single regional geography and then downplay their importance for accommodating future urban growth under the more concentrated growth alternatives (Metropolitan Cities and Large Cities), ignores their significant current and planned urban role in Snohomish County, particularly in the southwest part of the county. In addition, lumping together cities of similar size in developing growth distribution patterns disregards the locational importance of cities in the SWUGA in considering future growth patterns. The cities and unincorporated areas in the southwest of the county provides a greater capacity for growth than other cities of similar size and other unincorporated parts of the county.
Y-006-004	4. Protect and support Snohomish County's regional role in providing a transition between urban and rural growth patterns: Snohomish County has a unique role in the state that must be protected and enhanced in the development of the preferred alternative for growth. The county has the capacity for continued major urban growth in the southwest part of the county, largely as an extension of the Seattle metropolitan area. This urban growth area remains appropriately distinct and separate from the healthy rural and resource lands to the east, and continuing northward into Skagit County. This striking and successful land use transition is not seen in other counties and must be maintained and supported. As other parts of the state face future development pressures, the land use patterns in Snohomish County should be looked to as a model for aligning dense development with protection of rural and resource lands and economies. The preferred alternative should reflect, acknowledge and respect this critical transition area in the regional geography of the four-county region and ensure that it is not compromised. This can be achieved by designing a growth distribution pattern for the preferred alternative which distinguishes between the southwest urban growth area and the rest of the county. The distinction can be reinforced by developing a growth pattern which allocates increased jobs and residential growth in the SWUGA.
Y-006-005	5. Reduce proposed rural growth in Snohomish County: The county values the strong message that lands outside the UGA are to be protected from sprawl. At 22%, the rural population growth allocation for Snohomish County, shown in the Growth Targets Extended alternative, is too high. It exceeds the rural allocation of 15% recently adopted by the county

Y-006-002

VISION 2040 advances the concepts of preserving rural and natural resource areas. Policies related to both of these issues are found in the multicounty planning policies chapter in the development patterns and economic sections, as well as in other sections of the document. The Regional Growth Strategy chapter also advances the concept of more limited levels of development in the region's rural areas, and it allocates no growth to the region's natural resource areas.

Y-006-003

VISION 2040 addresses this issue. The Preferred Growth Alternative allocates the largest share of unincorporated urban area growth to Snohomish County in recognition of this issue.

Y-006-004

The County's goals for its SWUGA are acknowledged (see previous response).

Y-006-005

The Preferred Growth Alternative reduces the level of growth to Snohomish County's rural area, as compared to Growth Targets Extended.

Y-006-005	in the Comprehensive Plan update. This rural growth allocation represents a significant reduction to the rural growth trend of 28% observed in Snohomish County prior to GMA. The 15% rural growth share was originally adopted in 1995 by the county and the reduction in rural population growth it called for was actually achieved during the first 10 years of GMA implementation. Snohomish County is committed to maintaining this reduced level of rural growth and supports its expression in the preferred growth alternative.
Y-006-006	6. Concentrate growth in existing urban areas, but do not assume static urban growth boundaries: The DEIS assumes fixed UGAs. Snohomish County's 1995 Comprehensive Plan drew a relatively compact urban growth boundary for accommodating growth to the year 2012. This approach was continued in the recent update, resulting in modest UGA expansions as part of the county's overall land use strategy for accommodating growth to 2025. The DEIS must both acknowledge and incorporate the policies on UGA expansions in local comprehensive plans that allow for additional land to accommodate updated population forecasts under GMA, and anticipate that these boundaries will not necessarily be static in the intervening years to 2040. Need for expansions in Snohomish County beyond 2025 cannot be ruled out. Indeed, in South Snohomish County long term need to strategically expand UGAs to meet demand for growth near metropolitan centers is something that will need to be considered as a long-term option. Therefore, while it is appropriate to include a regional policy that discourages UGA expansions, there must be flexibility to accommodate local decision-making on expansions that reflects local geographies, critical areas, planning history and need, including the future viability of local communities.
Y-006-007	7. Include Snohomish County's Fully Contained Community: The DEIS fails to acknowledge the opportunity for a Fully Contained Community (FCC), included in the county's comprehensive plan update. The land use designation is supported by GMA and represents an opportunity to plan for growth and focus urban growth in appropriate areas.
Y-006-008	8. Support high-density, quality, mixed use urban design: The PSRC is to be commended for acknowledging the link between the built environment and human health. The preferred alternative should promote distribution of growth resulting in densities that can support and promote service provision and healthier life-styles, including provision of public transit and pedestrian/bike-friendly communities. The need for cities to accept and plan for higher densities to support service provision, balanced development of jobs and homes and healthier lifestyles must be supported through PSRC policies.
Y-006-009	9. Strengthen affordable housing provision: The declining affordability of housing is one of the top issues threatening our region. The SDEIS needs to address in greater detail the impacts of growth under each of the alternatives on housing affordability. In mitigating the lack of affordability, the SDEIS should analyze alternate strategies rather than refer to "best practices." The region needs to commit to a strong program for affordable housing provision—especially for low-income and minority households, but also for all moderate and middle income working households. The needs of each community of color within the "minority" category should be looked at. Grouping the communities together does not present the distinction necessary to address unique needs.
Y-006-010	10. Assess growth alternatives against funding for implementation: The preferred alternative must be developed and assessed in the SDEIS considering the capability of the region to implement any preferred alternative chosen, and to mitigate the impacts as fully as possible. The DEIS does not assess costs to provide infrastructure and services needed to deliver growth to 2040, which limits the ability to fully assess impacts of the various alternatives. For example, the DEIS assumes transportation improvements identified in Destination 2030 are in place which may not be a valid assumption given funding limitations and likely results in understated impacts. Relative differences for transportation costs, comparing one alternative to another, would also be helpful. For a complete assessment of

Y-006-006

The idea of expanding the urban growth area in the analysis of alternatives was considered during the VISION update process and was not accepted. Rather, the analysis was based on existing densities and development patterns within the region's urban growth areas, future planned densities derived from locally adopted comprehensive plans and Countywide Planning Policies, and densities necessary to absorb regional growth through the year 2040. Consistent with the Growth Management Act's urban growth area and "Buildable Lands" provisions (RCW 36.70A.110, 36.70A.215), the analysis assessed the ability of redevelopment, increased densities, and other reasonable measures to enable the region to accommodate future growth within existing urban areas. VISION 2040's policies do not prevent a jurisdiction from proposing a UGA amendment.

Y-006-007

As noted in your comment, FCCs are legal choices under GMA. See VISION 2040 policies on this topic for more information.

Y-006-008

VISION 2040 has addressed this issue with a set of Regional Design policies. Also, see the VISION 2040 Informational Paper on Regional Design, in FEIS Appendix I-F.

Y-006-009

VISION 2040 promotes addressing housing affordability. VISION contains a stand-alone housing policy section, as well as housing-related actions. While they do not set housing targets for local jurisdictions, they do speak to creating a regional housing action plan, which will likely address many of the issues raised in your comment. Also, affordability is addressed as an element of the Regional Growth Strategy.

Y-006-010	deliverability, the SDEIS must identify funding needs, shortfalls and sources for infrastructure and services. Regional funding available through PSRC must be committed to delivery of the preferred alternative and offered as part of an incentive package to promote plan delivery.
Y-006-011	11. Support parks provision: The four growth alternatives all show a decrease in the number of acres of park lands per thousand residents, with a greater percentage of the population closer to park facilities that will in turn be more crowded and provide decreased benefits to wildlife or the greater ecosystem. This bleak representation is not consistent with the county's Comprehensive Plan provision for increased parks with increased growth. The preferred growth alternative should not assume that the only growth in park land will accrue from mitigation. When completing the SDEIS, local and county programs for projected park acquisition and development should be reviewed to inform a more reasonable assessment of how parks would fit into the preferred growth alternative. Snohomish County has been affecting a transition from a rural county park model to a park system characterized by urban parks developed and operated in partnership with cities, school districts, non-profit sport and trails organizations and citizens. The county is committed to aggressively developing active parks in urbanizing areas providing recreational facilities and needed open space to help create and maintain quality of life. Add to this the development and operation of multipurpose long distance trails and well stewarded natural area parks. With access to grants, alternative local funding, private assistance and an entrepreneurial culture, parks will continue to be a major component of every community in Snohomish County far beyond the horizon of the regional vision.
Y-006-012	12. Emphasize environmental protection: Snohomish County is committed to the preservation and enhancement of high quality ecosystems. The county's regulations are based on "best available science" (BAS). The county is also incorporating programs for low impact development (LID) into our land use regulations. Concentrating growth in existing urban areas is likely to impact the functions and connectivity of ecosystems. Preserving water quality and protecting the natural environment in the urban areas are the focus of the county's Comprehensive Plan natural environment policies. Concentrating growth will increase the need and demand for mass transit systems and development of regional transportation alternatives that will benefit air quality will require the cooperation and coordination of the cities and all four counties. The SDEIS must clearly identify how compliance with environmental regulations will be achieved, and the approach for providing any necessary mitigation. Snohomish County is committed to continue working with our regional partners on programs and initiatives to protect the environment. The mitigation discussion in each of the environmental elements covered in the document highlights how the region will continue to rely on an assemblage of local and state regulations and financial mechanisms. The regulatory framework and financial resources of local communities are presently strained to address the effects of growth to date. If the region is to implement a vision to accommodate an additional 1.6 million in population and 1.2 million jobs, there has to be a regional approach to financing the region's implementation approach. This is underscored by the document's admission that the region does not have a highly visible, broadly based, publicly adopted and privately endorsed regional environmental strategy. The SDEIS needs to provide greater clarity on how the preferred alternative will a) strengthen regional environmental planning, b) emphasize strategies and multi-county policies, and c) encourage use of specific tools and techniques to address environmental concerns.
Y-006-013	13. Plan for a four-year university in Snohomish County: A prosperous economy relies on availability of a skilled local workforce. The county's population and economic growth support location of a four-year institution in either an existing urban area or through a UGA expansion which should be identified and assessed in the SDEIS.

Y-006-010

As was done in VISION 2020, fiscal analysis was completed at a scale and level of detail appropriate for this regional visioning process, including the Public Services chapter, Cost of Sprawl Issue Paper, etc. Also, a Fiscal Impact sidebar was added to VISION 2040.

Regarding transportation infrastructure specifically, as VISION 2040 is being adopted, the Regional Council is beginning the process of updating Destination 2030 to align it with VISION 2040. This will provide an opportunity for a more detailed analysis of transportation funding. Lastly, a set of "fiscal" policies and actions have been added to VISION 2040.

Y-006-011

The analysis in the FEIS did not assume any additional parks being added, given the lack of information and decision-making regarding when and where future parks might be sited. This level of analysis would be more appropriate for a local comprehensive plan, and will be one of the factors local governments consider as they work to help implement the VISION in their own local communities in a manner responsive to local circumstances.

Y-006-012

Comments noted. See VISION 2040 Environmental Framework, Environmental Policies, and Environmental Actions for more information. Also, VISION 2040 does not intend to change any existing needs to comply with existing regulations. Lastly, VISION 2040 contains policies and actions related to regional coordination on infrastructure funding to support growth.


Y-006-014

While the principles for concentrated growth in the Metropolitan Cities and the Large Cities alternatives can be generally embraced, the preferred alternative should allocate a larger share of the regional jobs growth to Snohomish County based on the combined ability of the cities and the unincorporated UGA in South Snohomish County (SWUGA) to serve as a major growth center. It should also allocate to Snohomish County the comparable share of the region's population growth that it has seen in the past. The SWUGA is not adequately reflected in any of the regional geographies and this must be remedied in the development of the preferred alternative in order to provide the capacity for a larger share of the job growth to this area in order to support economic development and to provide a better balance between jobs and residential growth.

Finally, the preferred alternative should reflect the uniqueness of the counties and must include room for the local autonomy provided under GMA, particularly in considering the delineation of the urban growth area boundary and the definition of the regional geographies.

The county appreciates the opportunity to comment on the DEIS. While this letter necessarily focuses on changes that the county would like to see in the SDEIS, we acknowledge and appreciate the work and commitment of the PSRC board, staff, and consultants in creating a readable and concise document that encapsulates complex conditions and options, and facilitating a responsive public review process. In addition to your review of comments in this letter, the county requests your review of the more detailed technical comments that are included in the attached table. If you have any questions on our comments, please contact Jacqueline Reid, supervisor of Long Range Planning. Jacqueline can be reached at Jacqueline.Reid@co.snohomish.wa.us or at (425) 388 3380.

Most sincerely,


Aaron Reardon
County Executive

cc: Councilmember Kirke Sievers, Snohomish County Council Chair
Peter Camp, Executive Director
Mark Soine, Deputy County Executive
Craig Ladiser, Planning and Development Services Director
Steven Thomsen, Department of Public Works Director
Gary Weikel, Parks Department Director
Janelle Sgrignoli, Human Services Director
Brian Parry, Executive Administrative Assistant
John Chelminiak, County Council Chief of Staff

Y-006-013

This issue was not addressed in the SDEIS because it is an issue determined to be best addressed at the local jurisdiction level.

Y-006-014

VISION 2040 has addressed this issue. Also, see responses to previous comments regarding job-housing balance, cross-county commuting, and local authority.

**PSRC "VISION 2020 PLUS 20" DEIS
Snohomish County Comments: Technical Attachment
July 31, 2006**

	SECTION	COMMENT
Y-006-015	5.1	Population, Employment, and Housing
	5.1.1 p. 5.1.7	The SDEIS should consider the impact of the preferred alternative for growth distribution on the availability and protection of housing stock, and the GMA requirement for provision of a variety of housing stock. The DEIS seems to rely on development of new, mostly multifamily, housing units. Protection of smaller housing (mostly that built in the 1940s-1970s) from redevelopment would have important benefits to the choices of housing for lower-income families, and should be considered in the assessment.
Y-006-016	5.1.1. p. 5.1.8 par. 3	The statement "Average rents also increased rapidly in response to heightened demand during the late 1990s, although they have stabilized in recent years as a result of the 2001 recession" requires further review. Analysis by Dupre+Scott (<u>The Apartment Vacancy Report</u> ; <u>The Apartment Advisor</u> ; and <u>The Apartment Development Report</u>) indicates that the recession may not have had as much to do with the decline as did level of building and demand changing from the rental market to the ownership market.
Y-006-017	5.1 p. 5.1.11	Figure 5.1.6 in the DEIS, the spatial distribution map, is intended to depict spatial distribution of population and employment based on future land use designations in Comprehensive Plans. However, it does not depict the growth that we would expect to see under our current GMA plan as it shows more dispersion of activity unit growth inside the UGA than we would expect given our current urban centers along I-5, higher density zoning along Hwy 99 and between Hwy 99 and I-5, and new areas for single family development along the eastern portion of the Southwest Urban Growth Area (SWUGA). If the data sources and tools used in the DEIS to produce the map are to be used in the development of the preferred alternative, we request that the information is reviewed to check for consistency with Snohomish County data.
	5.3	Transportation
Y-006-018	5.3.4	In developing the preferred alternative, it would be helpful to discuss steps that can be taken early to retain options for development of mass transit systems in future. The SDEIS should explore options for identification and preservation of routes and rights-of-way for future development of mass transit systems in line with projected growth.
Y-006-019	5.3.4 p. 5.3.21 par. 7	There is recognition that Destination 2030 is to be updated in the coming years and that environmental analysis would be conducted with this update. The SDEIS for the final growth alternative should provide a discussion of the future work that will be completed related to transportation planning in the region.
	5.4	Air Quality
Y-006-020	5.4.1 p. 5.4.5	Figure 5-4-1 in the DEIS shows that Snohomish County is located in a concentration area for carbon monoxide and ozone. The SDEIS should include discussion about future modeled levels of these airborne pollutants relative to increased growth.
	5.5	Ecosystems
Y-006-021	5.5.1 p. 5.5.4 par. 4	The discussion of impervious surfaces states that no detailed information or reliable source data on impervious surfaces exists for the region. However, Figure 5-6-7 gives estimated areas of impervious surface for the four growth alternatives.

Y-006-015

The FEIS speaks to the issues of gentrification and displacement and housing types under all the alternatives. However, 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.

Y-006-016

Thank you for the comment pointing out that the lower rates of growth in rental rates was due to a variety of factors; the discussion of rents has been revised, noting that rents are again on the rise.

Y-006-017

Comments noted. To address issues such as these, PSRC formed a technical working group, made up of local government staff, to help with the development of the Preferred Growth Alternative. This did not address revisiting the previous alternatives and their technical development, but instead focused on the PGA.

Y-006-018

To accompany the Preferred Growth Alternative, PSRC has developed multicity planning policies that include transit supportive strategies such as those you describe. However, the analysis of specific corridors and the implementation steps needed to preserve or develop them is more appropriate to system and corridor level planning efforts. This includes the recent work by Sound Transit for its Long Range Plan Update and Phase II program, or as part of the update of Destination 2030 by PSRC, following the adoption of VISION 2040.

Y-006-019

Both the FEIS and VISION speak to the next steps and update of Destination 2030.

Y-006-020

The FEIS contains information describing all criteria pollutants at their appropriate scale in their respective conformity and maintenance areas.

Y-006-021

The information provided in the figure in the FEIS were higher level estimates based on a

growth forecasting model. The FEIS information remains correct in stating that accurate detailed information in the 4-county region is not available.

	SECTION	COMMENT
		Impervious surface has been estimated throughout the region using Landsat imagery. Snohomish County can supply detailed and reliable data for our jurisdiction.
Y-006-022	5.5.1 p. 5.5.8 fig. 5-5-4	The Port of Everett and the City of Everett include coastal tidelands and estuarine wetlands of regional significance within the UGA of Snohomish County. Located at the mouth of the Snohomish River, these wetland areas have high levels of diversity and are critical for salmon recovery in the Snohomish River basin. The Natural Heritage Program and the Priority Habitats and Species list in the Vision 2020 Update EIS should be revised to include these areas.
Y-006-023	5.5.4 p. 5. 5.17	Snohomish County recommends an additional mitigation measure: "Culvert repair and replacement in developed areas can provide fish passage and stream habitat restoration."
	5.6	Water Quality and Hydrology
Y-006-024	5.6.1 p. 5.6.3	When discussing impervious surfaces, the EIS should indicate whether it is referring to total or effective impervious area.
Y-006-025	5.6.2 p.5.6.10	The discussion of impervious surfaces should be expanded to address how impervious surfaces decrease summer flows, increase water temperature, and decrease dissolved oxygen during the summer months when these conditions are critical for aquatic life. Wetlands should be added to the list of characteristics that mitigate the effects of increases in impervious surfaces. Dissolved oxygen should be added to the list of primary water quality problems as the amount of dissolved oxygen in water is critical to fish and other aquatic species and may indicate the presence of other pollutants.
Y-006-026	5.6.4 p. 5.6.15	In considering growth distribution and mitigation measures, the SDEIS should note that redevelopment provides an opportunity to retrofit existing systems that may not have been built to current standards.
	5.7	Public Services and Utilities
Y-006-027	5.7.4 p. 5.7.25 par. 3	As a potential mitigation measure, use of incentives to utilize innovative/alternative technologies for sewage and/or septic disposal should be included, to help preserve surface water, groundwater and soil resources.
	5.9	Environmental Health
Y-006-028	5.9.1 p. 5.9.1	In considering the affected environment, the SDEIS should consider the role that use of green building techniques can have in minimizing the use and disposal of toxic chemicals associated with accommodating increased growth.
Y-006-029	5.9.1 p. 5.9.2	Auto wrecking yards ("junk yards") should be added to the list of vehicle-related businesses.
	5.10	Energy
Y-006-030	5.10.1 5.10.8 par. 5	Statewide and local policies support alternative energy initiatives and should be referenced in the SDEIS. The development and assessment of the preferred alternative should consider its impact on the ability to support alternative energy sources and programs.
	5.11	Historic, Cultural, and Archeological Resources
Y-006-031	5.11.1 p. 5.11.2	The DEIS notes that if historic, cultural and archeological sites are discovered during development, they are candidates for recording and study. The SDEIS should identify that this is required, not optional, for archaeological sites and sites associated with Native American history.
Y-006-032	5.11.2 p. 5.11.5	The SDEIS should acknowledge that redevelopment of existing urban areas can threaten historic buildings and spaces.

Y-006-022

The Final EIS has been revised to reflect these areas.

Y-006-023

This mitigation measure has been added.

Y-006-024

This issue is now included in the Final EIS.

Y-006-025

These issues have been noted in the Final EIS.

Y-006-026

The benefits of redevelopment are included in the discussion of impacts as well as in mitigation in Chapter 5.6 of the Final EIS.

Y-006-027

Thank you for the suggestion. These measures are included as potential mitigation in the Final EIS in Section 5.7.

Y-006-028

Thank you for submitting your comment. Potential mitigation measures are discussed in Section 5.9.4 and a discussion of green building practices is included in the Final EIS.

Y-006-029

Thank you for your suggestion. It has been noted.

Y-006-030

The EIS discusses the PGA and how it could be served by different energy sources, but not how it supports different programs. It is likely a more compact growth pattern that could benefit conservation programs.

Y-006-033

5.13	Earth
5.13.1 p. 5.13.1 par. 3	Reword last sentence to read: "Additionally, stream deposits (less than 10,000 years old within the Holocene period) and recessional deposits can be found in many locations."
5.13.1 p. 5.13.2	Figure 5-13-1 should be corrected to extend the 'liquefaction/seismic hazard zone' shown in north King County into Snohomish County. (The mapping inconsistency arises from categorization of information from various sources. Steep Slopes were not measured and mapped in the same way in Snohomish County as they were in King and Pierce Counties. The dark green liquefaction shown along the river valleys in King and Pierce County becomes FEMA special flood hazard area in Snohomish County. These areas in most cases would also be designated liquefaction/seismic hazard areas.) Not all the fault lineaments of the South Whidbey Island Fault are shown on the map in Snohomish County.
5.13.1 p. 5.13.3 par. 1	A correction is required under "Primary Geologic Hazards". The North Whidbey Island fault crosses the north end of the island, stretching easterly across northern Snohomish County towards Darrington.
5.13.1 p. 5.13.3 par. 6	Modify the language to read: "Damage is most likely to occur in areas where non-structural fill has been placed or within valleys where soft sediments have been deposited. When soft unconsolidated soil is shaken, it may start to liquefy and flow if the proper hydrogeologic conditions are present." Notable liquefaction areas depicted in Figure 5-13-1 occur along the Puget Sound shoreline, in the City of Seattle on Harbor Island and at Interbay, between Woodinville and Redmond, at both ends of Lake Sammamish, south of Issaquah along the creek, along the Cedar River in Renton, in the Kent, Auburn, and lower Snohomish and Stillaguamish River valleys. In Pierce County, the principle area of liquefaction lies between Mt. Rainier and Commencement Bay."
5.13.1 p. 5.13.4 par. 1	Under "Steep slope and Landslide Hazard Areas" modify the note that steep slope data were not available for Snohomish County. Data is available. (In addition, Snohomish County is updating their geologic hazard maps to reflect slopes greater than 33% and areas of historic landslides using new LIDAR imagery data.)
5.13.1 p. 5.13.4 par. 5	The SDEIS should recognize mine hazards in general, not just coal mine hazards. Abandoned mines exist at the Monte Cristo and Index areas of Snohomish County and should be identified in the SDEIS.
5.13.1 p. 5.13.4	Under "Volcanic Hazard Areas" the SDEIS should acknowledge that Glacier Peak has a volcanic hazard area that could flow down the Stillaguamish River, as it has in the past, in the form of a lahar that may impact the communities of Darrington and Arlington.
5.13.1 pp. 5.13.4-5	Under "Regulatory Setting" it should be noted that, in addition to critical areas regulations, jurisdictions may have other regulatory approaches restricting development in hazard areas. For example, Snohomish County also has a seismic hazard ordinance that requires a 50 foot setback from active faults for certain types of occupancies and uses.
5.13.2 p. 5.13.6 par. 2	Under "Landslide Hazards" the DEIS notes that certain activities such as vegetation and groundwater removal can make areas more prone to landslides. Typically, removal of groundwater on a hillside is one of the preferred methods to assist in stabilizing the hillside or steep slope. (The text, as written, says that groundwater removal can make areas more prone to landslides.) Also, it should be noted that disturbance of the land can also make areas more prone to landslides.
6	Environmental Justice Discussion
6.1	While the mandated focus on "environmental justice" is limited to communities of color and low-income populations, Snohomish County has other disenfranchised and under-represented groups, such as recent migrants from eastern Europe and Arabian countries with significant cultural and language barriers, as well as those with significant disabilities. Environmental justice and the concept of "social justice."

Y-006-034

Y-006-031

PSRC recognizes that site developments that involve discovery will be subject to specific requirements under federal law. However, since the VISION 2040 update is a non-project action, the regulatory guidance discussion is provided as an overview, but is not intended to fully replicate the requirements of the regulations themselves.

Y-006-032

This impact was noted for all alternatives in the Draft EIS and is retained in the Final EIS.

Y-006-033

Thank you for your comments, most of which have been included in the Final EIS. Some of the background information that you reference as being recently available or updated by the County may have been collected earlier, but the findings of impacts and the range of mitigation measures at the regional level are not affected.

Y-006-034

PSRC has added to Section 6.1 a statement that the findings and the recommended measures are applicable to areas with immigrant or other populations that may not meet the USDOT definition for Environmental Justice.

Y-006-034		which is its foundation, are certainly broad enough to include them as well. PSRC should consider how this can be reconciled in developing the SDEIS
Y-006-035	6.3.2 p. 6.3	The efforts made by PSRC to draw input from communities of color and low-income population representatives have been extensive over many years, but they have been most successful in the very urban areas of King and Pierce Counties. The more dispersed communities of color in Snohomish County are not easily gathered together, do not have readily recognizable leadership hierarchies and many are recently arrived as part of the growth over the past decade. The "active advocacy and support groups" referred to in King and Pierce Counties are few in Snohomish County. Those that exist cannot be expected to serve as a "communications infrastructure" for the purposes of regional planning to the same extent that similar groups may have done elsewhere. The planned expansion of PSRC's Environmental Justice Planning Group and the planned implementation of region-wide public workshops are laudable objectives, but they will require a more locally supported effort in Snohomish County than has been attempted in the past. PSRC should consider how this can be reconciled in developing the SDEIS.
Y-006-036	6.4.1 p. 6.3	The 2003 work that resulted in the <u>Environmental Justice Demographic Profile</u> used census block groups as the unit of analysis, whereas the unit of analysis used in the Vision 2020 Update DEIS is census tracts, an aggregation of block groups. The result is a cruder depiction of the geographic distribution of the populations studied. In more sparsely populated rural areas, where census tracts become very large, the data aggregation involved reduces the ability to highlight concentrations of persons of color or low income. PSRC should consider how this can be reconciled in developing the SDEIS
Y-006-037	6.4.1 p. 6.4.5	Consider use of an alternative term to "minority" in the SDEIS. The term is not universally embraced and is also becoming increasingly less relevant as the proportions of "minority" populations grow. The term is inaccurate when applied to geographic areas where "minorities" are in the majority.
	6.4.1 p. 6.5 par. 3	"Minority" populations are usually described as including five major groups: Blacks; Hispanics; Asians; American Indian or Alaskan Natives; and Native Hawaiians or Other Pacific Islanders. Other possible "ethnicities" (e.g. eastern European, Arabian) or under-represented groups (e.g. people with disabilities) should be included in the assessment.
	6.4.1 p. 6.6 par. 1	All five major groupings (see above comment) are combined into one "minorities" group in the DEIS and the distributions are only presented for census tracts, rather than the smaller census block groups. This results in a loss of detail and a more limited understanding of the actual distributions. The low-income population is also presented using census tracts in the DEIS, even though census block groups were used in several prior reports. PSRC should consider how this can be reconciled in developing the SDEIS
Y-006-038	6.4.1 p. 6.11 par. 1	The DEIS adds an important second category of poverty that was not used in prior reports, that is, the low-income range has been expanded to include all those under 200% of poverty and dividing it into "very low-income" (0-99%) and "low-income" (100-199%) groups. This is a positive enhancement in light of the comparatively high local cost of living in the region and the resultant economic stress experienced by households above, as well as below, the poverty level. We would like this approach retained in developing the SDEIS.
	6.4.2 p. 6.20 par. 2	There is limited discussion of poverty trends in the DEIS, with no numerical comparisons of census data from 1990 and 2000, and the general statement that poverty increased slightly in the region as a whole. A brief reference to divergent trends within the region (decreases in Kitsap & Pierce; increases in King & Snohomish) should be presented quantitatively in the SDEIS.
Y-006-039	6.5.1a p. 6.27 par. 3	The source of data supporting the following statement should be provided: "It is likely that the trend for minority and low-income populations to increase in proportion to the general population will continue at a similar rate under all alternatives."

Y-006-035

PSRC notes your comment that Snohomish County's low income and minority populations have characteristics that can make them challenging to reach. Recognize that King, Pierce, and Kitsap county communities have geographic areas and characteristics with low income or minority individuals and groups that are also hard to reach if they are located outside of the major cities, as is increasingly the case. Throughout the VISION update and EIS process, PSRC has continued to reach out to members of the public, including through a wide array of media and venues, and staff have conducted hundreds of presentations. As the VISION 2040 document and the supporting EIS analysis does not involve site-specific proposals, additional efforts targeted at a given location or group in the region would not be needed specifically for the FEIS. However, PSRC agrees that improved strategies to reach and involve low income and minority populations throughout the region will be important as PSRC and its member jurisdictions move forward to implement the VISION and achieve its objectives through local planning actions.

Y-006-036

PSRC recognizes that census data are often provided at the block group level for environmental justice analysis at a project level and that some previous reports also used block groups. However, for the purpose of providing supporting information to the public and decisionmakers, PSRC determined that tract level information was appropriate, given the non-site- specific nature of the VISION update, and that the maps and the data tables needed to cover a 4-county geography.

Y-006-037

The language used to describe populations subject to environmental justice considerations is consistent with current usage at the federal level, including in the most recent data provided by the U.S. Census. The groups identified through the U.S. Census were considered in the analysis, although it should be recognized that the Environmental Justice information is not required for a SEPA review, and is provided here in response to comments and suggestions by PSRC members and others as additional information for their consideration. Also, see response to previous comment.

Y-006-038

The approach for reporting poverty used in the Draft EIS are being retained as suggested.

Y-006-039

This is an assumption that was made for the purposes of the analysis, and the Final EIS

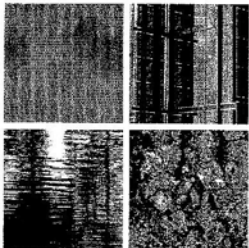
029

restates it is an assumption rather than a prediction or a forecast. Comments noted regarding the differences within the environmental justice populations.

Y-006-039		Communities of color are not equivalent to low-income populations nor do they necessarily increase, decrease or relocate in response to the same social and economic trends.
Y-006-040	6.6 p. 6.32 par. 3	The Vision 2020 Update involves land use and housing policies that have overlapping effects with regional transportation plans, emergency services plans, public utility plans, and essential public service plans of all types. Not all such plans are required by federal mandate to mitigate effects on communities of color and low-income populations. Deliberate coordination and appropriate mitigation by local government will hopefully assure that all such plans generate positive effects for those populations. The SDEIS should identify how such coordination will be achieved to maximize protection opportunities for communities of color and low income populations.

Y-006-040

Additional mitigation measures suggesting coordination with these other programs have been added in the SDEIS and the Final EIS.



VISION 2020 Update Draft Environmental Impact Statement

Comment Form

What's your vision for the future of the central
Puget Sound region? We want your input
and need to hear from you!

The public comment period ends on Monday, July 31, 2006.

The public is encouraged to provide thoughts, ideas, and concerns on the Draft Environmental Impact Statement to help select a preferred growth alternative. Comments should 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 vision2020update@psrc.org.
- By attending any of PSRC's board or committee meetings. 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 develop a preferred alternative. 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/datapubs/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 FRANK SLUSSER

ORGANIZATION SNOHOMISH COUNTY PDS

ADDRESS 3000 ROCKEFELLER M/S 604

CITY EVERETT STATE WA ZIP 98201

E-MAIL Frank.Slusser@co.snohomish.wa.us

☒ Check here if you would like to be added to the project mailing list.

Puget Sound Regional Council

Executive Summary

31



YOUR INPUT IS NEEDED

The region has some tough choices to make to get from four broad alternatives to a single vision that reflects our shared values and aspirations. Participants in the review process are asked to comment on the growth alternative that appears to best meet the needs of the region. You are welcome to mix and match portions of the alternatives that have been included in the Draft Environmental Impact Statement to form a hybrid that represents an alternative you prefer.

PLEASE CONSIDER COMMENTING ON THE FOLLOWING SUBJECT AREAS:

1. The environmental baseline (see *Chapter 2*)
2. The growth distribution alternatives — including ideas for a Preferred Growth Alternative (see *Chapter 4*)
4. Environmental justice (see *Chapter 6*)
3. Discussion of multicounty planning policies (see *Chapter 7*)

COMMENTS:

Y-007-001

IT IS IMPORTANT TO TAKE JURISDICTIONS
FEEDBACK INTO ACCOUNT. IT IS GOOD THAT
THE PROJECT TIMELINE HAS BEEN EXTENDED.
IN PARTICULAR, UINIC, UGA AND RURAL
GROWTH TARGETS SHOULD BE REALISTIC.

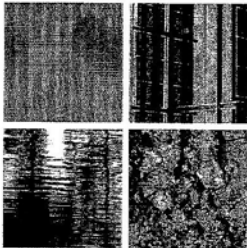
PLEASE ADDRESS COMMENTS TO:

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



Y-007-001

Comment noted about including jurisdiction staff. Subsequent to the release of the Draft EIS, PSRC formed a technical working group of local jurisdiction staff to help with the development of the Preferred Growth Alternative. This helped ensure that numbers of all regional geographies were realistic.



VISION 2020 Update 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.

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E-MAIL TONY.STIGALL@CO.SNOHOMISH.WA.US

☒ Check here if you would like to be added to the project mailing list.



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1. The environmental baseline (see *Chapter 2*)
2. The growth distribution alternatives — including ideas for a Preferred Growth Alternative (see *Chapter 4*)
4. Environmental justice (see *Chapter 6*)
3. Discussion of multicounty planning policies (see *Chapter 7*)

A follow up session would be helpful.

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

As requested, follow-up sessions were held.

COMMISSIONERS
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July 27, 2006

Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, Washington 98104-1035

Attn: Norman Abbott, SEPA Responsible Official

RE: Vision 2020 Update DRAFT Environmental Impact Statement
May 2006

Dear Mr. Abbott:

Thank you for the opportunity to review the Council's Draft Environmental Impact Statement (EIS). We submit the following comment for your consideration:

R-001-001

Public Services and Utilities
Section 5.7.2.3 Impacts to Water Supply
Page 5.7.15, Paragraph 2

"For King, Pierce and Snohomish counties, the Forum and Cascade predict that by about 2020 to 2023, additional supplies will be needed to meet the forecast average daily demand. The areas where demand is predicted to exceed supply by 2020 are shown in Figure 5-7-7."

The above referenced Figure 5-7-7 includes King County Water District No. 111 as an area where demand is expected to exceed supply demand by 2020.

We request that King County Water District No. 111 (WD111) be removed from Figure 5-7-7 to correctly depict the conditions that exist based on the following information:

The District is in the process of completing their 2006 Draft Water Comprehensive Plan, which states that, "There is no supply challenge for the District in the short term. The District currently has sufficient supply to meet the average day demand to 20 years out (2024) (Chapter 6 – Water Rights, Supply Analysis and Source Water Protection).

This supply analysis was based on utilization of the District's groundwater sources, the City of Auburn intertie and wholesale water from the City of Tacoma's Second Supply project (effective December 2002). It is expected that the District's Draft Water Comprehensive Plan will be out later this year for agency review. Should you require a copy of the plan, please contact our office.

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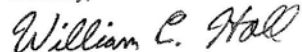
R-001-001

Thank you for your comment and the additional information. King County Water District No. 11 has been removed from Figure 5-7-7 as requested.

R-001-001

The District continues to evaluate its existing and future supply and facilities by coordinating with local land use authorities to meet the needs of its customers. It remains committed to providing cost-effective services to its existing and future customers. Thank you for the opportunity to comment on the Vision 2020 Update, Draft EIS. We look forward to the Final EIS due early next year. 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) 631-3770.

Sincerely,



William C. Hall
General Manager

cc: KCWD #111 Board of Commissioners, John Milne, Inslee, Best, Doezie & Ryder,
Greg Hill, Pam Cobley, Scott Goss - Roth Hill Engineering Partners, LLC

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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:

R-002-001

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

R-002-002

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:

R-002-001

Thank you for providing additional information about the important role the Port plays in supporting continued economic development in the region, and for reiterating key features of its operations and areas of public policy interest. As you know, PSRC is partnering with the Port and others through the Prosperity Partnership, which will play a strong role in helping to support continued economic vitality as the region grows. We address your specific comments by section below. However, given the broad regional focus of the VISION 2040 process and the alternatives for a four-county area, the level of analysis conducted for the FEIS is broad and programmatic. Therefore, the FEIS may not reflect the level of detail that would indicate issues specific to the Port of Seattle or its operations, but rather focuses on the types of impacts and issues affecting ports in general, as well as other jurisdictions and entities in the region. Still, the multicounty planning policies and VISION 2040 include additional discussion and policies reflecting port activities and opportunities for maintaining the long-term use and viability of manufacturing/industrial centers.

R-002-002

VISION 2040 has multicounty planning policies related to protecting and fully maximizing existing manufacturing/industrial centers. It also contains an implementation action to update the PSRC's Industrial Land Supply Study and, as part of that update, seek to develop an industrial land strategy. Also, see comments on the scale of the analysis. Lastly, additional discussion of manufacturing/industrial centers has been added to the FEIS.

- R-002-002** "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**
- R-002-003** **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 be 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.
- R-002-004** **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.
- R-002-005** **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."

R-002-003

Given the large regional scale of the project and the broad nature of the decisions to be made balancing a wide range of environmental and public policy factors, more detailed analysis of transportation impacts on specific facilities and locations was considered to be too detailed for the level of information needed to differentiate alternatives and consider their impacts and necessary mitigation before adopting VISION 2040. While the Final EIS does not attempt to determine detailed impacts, improvements, and funding for a specific facility or system, the analysis was sufficient to determine the types of impacts and their comparative magnitude among the alternatives. As VISION 2040 is being adopted, PSRC will be in the beginning stages of a major update to Destination 2030 to align it with VISION 2040; this will provide an additional opportunity to address this issue.

R-002-004

See response to comment 003 regarding the scale of the analysis. Also, VISION 2040 alternatives were analyzed using the planned investments in Destination 2030, none of which varied among the alternatives but instead were held as a constant as they were at the time of adoption of the 2001 version of the transportation plan.

R-002-005

This text revision is included in the Final EIS.

R-002-005 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.

R-002-006 **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.

R-002-007 **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.)

R-002-008 **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.

R-002-006

See response to comment 003 regarding the scale of the analysis, and the next steps in terms of Destination 2030. Also, VISION 2040 policies speak to the importance of freight and the priority of manufacturing/industrial centers for funding and investments.

R-002-007

The FEIS has been updated to discuss this issue.

R-002-008

Comment noted.

Mr. Norman Abbott
Page 4 of 6

- R-002-009** **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?
- R-002-010** **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.
- R-002-011** **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.
- R-002-012** **“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.
- R-002-013** **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:

R-002-009

See the FEIS air quality section for more information regarding PM 2.5 emission results under each of the alternatives. Given the variability of how the alternatives might ultimately be implemented through local plans and countywide policies, it would not be appropriate to estimate localized potential violations or responses. That would be part of subsequent, local planning and fall under future permitting actions.

R-002-010

Comments noted. PSRC looks forward to learning more about these activities.

R-002-011

Comments noted.

R-002-012

Comments noted. The project to voluntarily encourage shippers to reduce pollutants sounds promising.

R-002-013

VISION 2040 has addressed this issue and has policies that continue to support manufacturing/industrial centers. This includes protecting these lands from incompatible uses, and there are supportive freight-related policies as well.

- R-002-013**
- Protection from incompatible land uses adjacent to MICs
 - Provisions ensuring adequate access for freight

R-002-014

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>

R-002-015

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, it 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.

- R-002-016**
- 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

R-002-014

VISION 2040 economic policies support family wage jobs, industrial clusters, and manufacturing/industrial centers.

R-002-015

Thank you for your comment. The goals and policies have been expanded to include additional emphasis on the movement of freight. Please see the VISION 2040 document for an expanded discussion of how the regional goals and strategies have been refined to support freight and the economy.

R-002-016

Comments noted. These ideas were considered by the Regional Staff Committee and Policy Boards as they developed the multicounty planning policies.

Mr. Norman Abbott
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R-002-016

encouragement) for local jurisdictions to make local transportation plans consistent with the Regionally Significant Freight and Goods Transportation System.

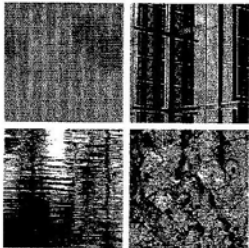
Thank you again for your leadership on this important regional effort. Please call me at 206-728-3778 should you wish to have any questions regarding these comments.

Sincerely,



Geraldine Poor, Regional Transportation Manager

Cc: Okamoto, Merritt, Wolf, Leavitt, S. Jones



VISION 2020 Update Draft Environmental Impact Statement

Comment Form

What's your vision for the future of the central Puget Sound region? We want your input and need to hear from you!

The public comment period ends on Monday, July 31, 2006.

The public is encouraged to provide thoughts, ideas, and concerns on the Draft Environmental Impact Statement to help select a preferred growth alternative. Comments should 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 vision2020update@psrc.org.
- By attending any of PSRC's board or committee meetings. 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 develop a preferred alternative. 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/datapubs/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 Amy Shumann

ORGANIZATION Public Health - Seattle & King Co., Chronic

ADDRESS 999 3rd Ave, Suite 500 Disease Prevention

CITY Seattle STATE WA ZIP 98104

E-MAIL amy.shumann@metrokc.gov

☒ Check here if you would like to be added to the project mailing list.



Thanks to
Kameshwari Pothukuchi & Jerome Karyman
for 10 issues

YOUR INPUT IS NEEDED

The region has some tough choices to make to get from four broad alternatives to a single vision that reflects our shared values and aspirations. Participants in the review process are asked to comment on the growth alternative that appears to best meet the needs of the region. You are welcome to mix and match portions of the alternatives that have been included in the Draft Environmental Impact Statement to form a hybrid that represents an alternative you prefer.

PLEASE CONSIDER COMMENTING ON THE FOLLOWING SUBJECT AREAS:

1. The environmental baseline (see Chapter 2)
2. The growth distribution alternatives — including ideas for a Preferred Growth Alternative (see Chapter 4)
4. Environmental justice (see Chapter 6)
3. Discussion of multicounty planning policies (see Chapter 7)

COMMENTS:

It would be great to see Vision 2020 address food system issues. It's great that the PSRC has addressed the health impacts of transportation & other land use decisions. Expanding the health impact re food systems would be innovative — and is critical to the health of our community. Specifically:

- ① Location of supermarkets, grocery stores, fast food outlets & food wholesaling
- ② Design of food outlets
- ③ Community gardens
- ④ Studies of impact of food sector on local economy
- ⑤ Farmers' markets
- ⑥ Food issues addressed in neighborhood plans
- ⑦ Food related economic development

PLEASE ADDRESS COMMENTS TO:

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

- ⑧ Food issues addressed in comp plans
- ⑨ Hunger prevention programs
- ⑩ Agricultural land preserved & crop diversity

Puget Sound Regional Council

R-003-001

The issue of food supply, markets, design, and safety are compatible with the policies in VISION 2040, although they are not all called out as separate policy elements but rather included in broader sets of policies. See the development patterns, public services, and economic policies for related policy statements.

R-003-001



July 31, 2006

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

C
110 Union St Ste 500
Seattle, WA 98101

Re: VISION 2020 Update DEIS

Dear Mr. Abbott,

We appreciate the opportunity to comment on the VISION 2020 Update Draft Environmental Impact Statement, (DEIS). The document provides a significant amount of information that is easy to read.

R-004-001

Our comments focus on air quality and public health concerns. Over the last 30 years the air emissions of concern in the region have changed from carbon monoxide, and fugitive dust to climate change, fine particles, and toxic emissions, particularly diesel fuel exhaust, and concern remains for ground level ozone. Our comments reflect this new focus and the DEIS should reflect this as well.

Mobile sources remain a significant concern because they continue to be the source of over half of the air pollutants and greenhouse gases in the region. Climate change deserves additional discussion in the DEIS. Diesel emissions from diesel vehicles, vessels, and equipment are the major source of toxic emissions. Combustion, which includes indoor and outdoor burning as well as mobile sources, is the major source of fine particulate emissions. Marine emissions deserve emphasis because marine activities are expected to grow significantly over the next quarter century. The region is undertaking a quarter century of construction of major transportation projects such as the Alaska Way Viaduct, rebuilding I-405, and the SR-520 bridge, repaving I-5, and reconstructing the Seattle Ferry Terminal, and the cumulative effect of these construction related emissions should be considered.

R-004-002

The agency's draft growth management policies recommend that communities:

Guide growth to urban and industrial centers featuring

- mixed land uses and higher densities
- orientation around transit service
- safe, easy pedestrian access
- a balance of transit, pedestrian, bicycle and automobile modes of transportation

and

Build transportation facilities that reduce vehicle and vessel emissions by

R-004-001

VISION 2040 advances the concepts of protecting the environment and addressing climate change. Policies related to both of these issues are found in the multicounty planning policies chapter, in the environment and transportation sections, as well as in other sections of the document. VISION 2040 begins with an environmental and sustainability framework chapter, and its implementation actions include future work on the Regional Council exploring its role in regional environmental planning. Lastly, climate change is a key element in the update of Destination 2030, the region's metropolitan transportation plan.

R-004-002

Thank you for the background information regarding the agency's growth management-related policies. They were useful to consider when developing the VISION 2040 environmental policies.

R-004-002

- reducing the miles traveled or trips taken
- reducing congestion that contributes to air pollution, without increasing the miles traveled or trips
- improving transit service and facilities
- increasing pedestrian and bicycle facilities
- improving connections between modes of transportation
- improving freight movement
- creating opportunities for car sharing by businesses and residents.

R-004-003

We support alternatives that result in the lowest emissions of carbon dioxide, fine particles and ozone precursors, specifically the Metropolitan Cities and Larger Cities alternatives. We also support developing a preferred alternative incorporating elements from all the alternatives that would best reduce harmful emissions. A copy of our Draft Growth Management policies is attached to provide additional background information on our concerns and comments.

R-004-004

As noted in the discussion of cumulative effects, compact growth patterns can have adverse effects on public health. For that reason, the agency's draft growth management policies recommend that:

Development and transportation should not endanger the health of sensitive, and vulnerable populations, and people of a particular race or ethnicity, age, income, ability, or gender or disproportionately expose these populations or people to transportation associated emissions.

and

When development occurs, prevent

- locating concentrations of people near uses or facilities producing significant odors or harmful emissions and vice versa.
- building and site designs that expose people to sources of harmful pollutants, such as loading docks and vents

Actions that would implement these policies could be included in the discussion of mitigation measures.

Detailed comments on the Air Quality chapter of the DEIS are also attached.

If you have any questions please contact Paul Carr, 206-689-4085, paulc@psccleanair.org of my staff. Thank you for the opportunity to comment. We look forward to helping create the best vision for our Puget Sound community.

Sincerely,

Dennis McLerran

R-004-003

Comments noted regarding your support for the focused growth alternatives.

R-004-004

VISION 2040 includes policies and provisions that call for doing better than existing standards for carbon monoxide, ozone, and particulates. It also calls for reducing levels for air toxics, fine particulates, and greenhouse gases. Also, the FEIS discusses issues related to impacts on sensitive populations—see the VISION 2040 Information Paper: At the Microscale, which discusses this topic.

Detailed Comments on Chapter 5.4 Air Quality

R-004-005	<p><u>Section 5.4.1 Affected Environment A. Physical Setting, pp. 5.4.1-3</u> Reorganize this section to reflect the changing focus of concern in air quality: Add a sentence(s) describing the change in focus, (see the cover letter for possible language). Make Greenhouse Gases & Climate Change the first emissions discussed. Make Carbon Monoxide the last emissions discussed.</p>
R-004-006	<p><u>Section 5.4.1 Affected Environment B Regulatory Setting, pp. 5.4.4-6</u> In the discussion of the National Ambient Air Quality Standards, (p.5.4.4) note that the ozone standards and the fine particulate standards may be tightened in the near future and the region could end up with areas of nonattainment. After the discussion on Transportation Conformity add a new discussion on General Conformity. The region has been subject to General Conformity concurrently with the Transportation Conformity requirements. General Conformity regulations apply to federal actions that are not subject to Transportation Conformity regulations. General Conformity comes into play in federal activities at airports such as SeaTac, military installations, and national parks.</p>
R-004-007	<p><u>Section 5.4.1 Affected Environment C. Current Conditions and Trends</u> Reorganize this section to match the organization of the Physical Setting section, e.g. lead off with Greenhouse Gases & Climate Change. p.5.4.7 Regional Pollutant Trends, second paragraph: add the phrase "and maintain the National Ambient Air Quality Standards", to the following sentence, "Reducing volatile organic compounds will be the most effective way to reduce ozone."</p>
R-004-008	<p><u>Section 5.4.3 Cumulative Effects, p. 5.4.11</u> This section should include a list of all of the major transportation projects underway, scheduled and planned for, during the Vision 2020 planning period. Such a list or table would enable readers to better assess the cumulative effects of construction related emissions.</p>
R-004-009	<p><u>Section 5.4.4 Potential Mitigation Measures p. 5.4.12</u> A couple of clarifications will assist readers in understanding efforts to reduce diesel emissions: The Agency's Diesel Solutions program encompasses retrofit technology and cleaner fuels, public and private fleets, on-road and off-road vehicles and equipment, and marine vessels. Without the program it will be 2040 before normal fleet turnover produces a fleet that is nearly 100% clean or retrofit. The goal of the Diesel Solutions program is to accelerate that process and retrofit, 50% of the public fleet and 30% of the private fleet over the next few years. That goal has not been met yet, but over 2000 vehicles have already been retrofit.</p>
R-004-010	<p>Regulation can be considered a mitigation measure during the planning phase, while it would not be considered a mitigation measure during a project environmental review. For example, a regulation prohibiting wood fireplaces in new urban developments would be a potential mitigation measure for addressing the effects of Vision 2020. A copy of the Agency's potential mitigation measures is attached to provide additional examples.</p>

R-004-005

While we understand the thinking behind your comment, the air quality chapter was not reorganized. This should not be interpreted as stating a priority for addressing one pollutant versus another. Also note that VISION 2040 policies related to climate change and emissions have been developed that stress the priority of this issue.

R-004-006

The FEIS has been updated to discuss this issue.

R-004-007

See previous response about reorganizing the chapter. The suggested addition was included in the FEIS.

R-004-008

The construction emissions created by major projects is now noted in the Final EIS, and a cross-reference to section 5.3, where the major projects are listed, is provided.

R-004-009

The FEIS has been updated to address this issue.

R-004-010

Thank you for the clarification and information on mitigation measures; these provided useful information that was considered as the VISION 2040 multicounty planning policies were developed.

R-004-011

Thank you for the background information regarding local government actions and clean air. This was useful background information that was considered as PSRC worked to develop VISION 2040.

LOCAL GOVERNMENT ACTIONS TO PROMOTE CLEAN AIR (Proposed Policies on Growth Management and Transportation)

Introduction

R-004-011

The choices local governments make when building public facilities and transportation systems, permitting development, and adopting and implementing growth management plans affect where people live, the type of home they live in, how far they travel, and whether they drive alone or ride with others. All these public and individual choices have an effect on public health, air quality and global climate. As more knowledge about the connections between land use, transportation and air quality becomes available, it is essential that air agencies and local government share what we know and work together.

The historical reliance on the Puget Sound Clean Air Agency, Washington Department of Ecology and the Environmental Protection Agency to address air quality through technology, such as new motor vehicle emission standards, is no longer sufficient to provide healthy air for our citizens, our communities and our planet. While we have been successfully reducing many sources of air pollution, such as carbon monoxide, many threats to public health and air quality remain and the nature of the problem is changing. Global warming is happening and human actions, primarily fossil fuel burning, are the key cause of the problem.

As more people live in the Puget Sound region and more development occurs air pollution and public health risks could increase. Living, working or attending school too close to air pollution sources may increase both cancer and non-cancer health risks. Because of these concerns we are increasing our focus on fine particulates and air toxics and asking local governments to do the same. Mitigation of the construction impacts of diesel engines may also be warranted where staging areas could unduly impact residences or businesses or where construction periods of major projects will be prolonged or involve large numbers of hauling trucks or pieces of construction equipment.

With increasing levels of mixed use development, infill and redevelopment of brownfield sites, issues of proper separation of incompatible land uses and/or mitigation of potential odor and air toxics are becoming more significant. It is very difficult for the Clean Air Agency to successfully resolve these issues where local governments have issued construction permits or occupancy permits for uses without consideration of air quality issues.

Communities must consider air quality and public health along with their housing needs, economic development priorities, transportation problems, and other quality of life issues. We believe that with careful location and planning, growth management concepts that benefit regional air quality and address climate change can be compatible with protecting the health of individuals at the neighborhood level. We acknowledge the uniqueness of communities -- that there is no "one size fits all" solution-- and are committed to working with local governments to implement solutions that are best for their communities. With this understanding, the Puget Sound Clean Air Agency strongly suggests that local governments take the following key actions to promote clean air and public health in their communities.

Key Actions

Separate incompatible land uses

R-004-012

The increasing use of mixed-use and denser development to accommodate growth requires greater care in making sure incompatible land uses and high-volume traffic corridors are appropriately separated from residential uses and other concentrations of people to avoid health impacts to sensitive populations and nuisances such as odors, overspray, dust and smoke. Incompatible land use issues should be addressed in local policies, procedures and ordinances.

When development occurs, prevent

- locating concentrations of people near uses or facilities producing significant odors or harmful emissions and vice versa.
- building and site designs that expose people to sources of harmful pollutants, such as loading docks and vents

The Clean Air Agency will consult with local governments on new plans and development regulations when requested to offer our expertise on what uses may create significant conflicts.

Implement air-friendly design

R-004-013

Urban development large and small, residential and commercial, public and private, individually and cumulatively, will impact air quality in the region. Recent urban design research has demonstrated that compact, denser development in transit friendly urban centers can reduce traffic trips and resultant air pollution and greenhouse gases. Well conceived and coordinated growth management planning and design can be an important element in efforts to protect public health, ensure good air quality and protect global climate. Sustainable-building and energy-efficiency standards and practices and construction mitigation measures can reduce greenhouse gas emissions and other air quality impacts. Local governments actions should:

Guide growth to urban and industrial centers featuring

- mixed land uses and higher densities
- orientation around transit service
- safe, easy pedestrian access
- a balance of transit, pedestrian, bicycle and automobile modes of transportation.

Promote cleaner, less polluting development by

- increasing the use of low emission construction equipment and practices, e.g. avoiding idling
- using building designs, technology, and practices that reduce or eliminate harmful emissions, e.g. green building concepts
- analyzing and mitigating cumulative impacts on air quality from development occurring across the region and over time, and from multiple projects within an area,
- Collaborating on transportation and land use projects that reduce emissions from mobile sources.

As mentioned above, the concentration of development reduces air pollution and greenhouse gases, but also requires additional sensitivity to insuring that land uses are compatible to prevent unacceptable impacts from odor and air toxics. The Clean Air Agency encourages compact, mixed use and transit friendly development, but cautions that appropriate mitigation of impacts and separation of land uses is necessary to allow such developments to be successful.

R-004-012

See previous responses regarding the usefulness of this background information. Also, PSRC considered this issue through the use of an Informational Paper entitled "At the Microscale: Compact Growth and Adverse Health Impacts" - See FEIS Appendix I-F.

R-004-013

VISION 2040 has addressed these issues with policies related to clean air, reducing emissions, green building, and more.

R-004-014

Promote transportation alternatives

Driving a private car is probably the most polluting daily activity of a typical citizen. Local land-use plans should ensure that people have transportation choices that offer congestion relief, don't require driving alone, support efficient movement of goods and services and reduce harmful emissions. Local government actions should:

Promote less polluting travel by

- insuring that new developments and subdivisions incorporate pedestrian access and create opportunities for walking or taking transit for daily shopping needs
- creating opportunities for carpooling and car sharing
- increasing the use of low emission vehicles, vessels, equipment and fuels
- retrofitting diesel vehicles, vessels, and equipment with emission reduction equipment
- changing how vehicles, vessels and equipment are operated, e.g. no idling.

Build transportation facilities that reduce vehicle and vessel emissions by

- reducing the miles traveled or trips taken
- reducing congestion that contributes to air pollution, without increasing the miles traveled or trips
- improving transit service and facilities
- increasing pedestrian and bicycle facilities
- improving connections between modes of transportation
- improving freight movement
- creating opportunities for car sharing by businesses and residents.

The Clean Air Agency can offer financial and technical assistance to local governments that will reduce emissions and save money for local governments. The Clean Air Agency has directed over \$4 million dollars in grant funding from the Washington Legislature and EPA to local and municipal fleets, and school districts to reduce diesel emissions between 2002 and 2006. We can help local governments by partnering with them in developing green fleet policies, reducing diesel emissions in municipal, school and other diesel fleets, developing construction mitigation plans for diesel equipment, and bringing funding and technical assistance in reducing community diesel emissions.

Require clean fireplaces in new single- and multi-family developments

Wood-burning fireplaces and stoves can cause health and nuisance impacts in residential environments when improperly used. These impacts are intensified when they occur in higher-density residential areas, within urban growth areas, or in outlying residential areas that are developed at urban densities. Local governments should:

Promote cleaner, healthier residential environments by

- promoting natural gas or propane stoves and fireplaces in new residential developments.
- requiring use of natural gas or propane fireplaces and stoves in new residential and

R-004-014

VISION 2040 has addressed these issues, with policies on promoting less polluting travel and reducing vehicle emissions through a variety of strategies.

R-004-015

This comment was considered during the policy development process and not included. This issue is appropriate to address at the local level.

R-004-015

R-004-015

mixed use developments inside urban growth areas and residential areas that are developed at urban densities.

Support environmental justice

R-004-016

Too often, land uses, that produce odors or harmful emissions, and transportation facilities that contain high volumes of vehicles are located close to sensitive and vulnerable populations, such as the elderly and the young, or close to people of a particular race or ethnicity, age, income, ability, or gender, exposing them to increased air pollution and health risks. Local governments should prevent new or expanding uses from having a disproportionate impact on these populations and people and mitigate the impact of the existing uses.

Development and transportation should not endanger the health of sensitive, and vulnerable populations, and people of a particular race or ethnicity, age, income, ability, or gender or disproportionately expose these populations or people to transportation associated emissions.

Ensure land use and transportation actions reduce emissions of toxics, fine particulate matter, ozone and carbon dioxide.

Set emission reduction goals and support standards and regulations that protect public health, improve air quality, improve visibility and address climate change.

The Clean Air Agency can assist local governments in developing plans and regulations that mitigate or prevent disproportionate environmental justice impacts. The Agency will also identify those impacts in environmental reviews for projects and will suggest possible mitigation measures.

Use the State Environmental Policy Act (SEPA) as a tool and a safety net for identifying and addressing incompatible land uses

R-004-017

The SEPA process provides an excellent tool for addressing specific, and emerging issues and introducing mitigation measures that might not be addressed under existing planning policies, development regulations or permit processes. Local governments should use SEPA as a safety net for identifying and addressing incompatible land use and development impacts related to air quality.

Ensure that environmental analyses of air quality impacts

- address all harmful pollutants and identify mitigation
- comply with all environmental regulations including NEPA, SEPA, and state and federal conformity regulations
- use consistent and comparable impact assessment methodologies
- use approved data sources, such as the agency's emission inventories and air quality data.
- identify disproportionate air quality impacts on sensitive and vulnerable populations and people of particular race or ethnicity, age, gender, income or ability and provide mitigation of environmental justice impacts

R-004-016

PSRC agrees with the concerns that you identify regarding environmental justice. That is a primary reason that Environmental Justice was included as an element of the FEIS (Chapter 6), which has identified potential mitigation measures and best practices for reducing disproportionate incomes to low income and minority populations.

R-004-017

VISION 2040 does not speak to local governments' use of SEPA because SEPA is already required under state law. The comment in support of using SEPA is noted, and is consistent with the manner in which PSRC used SEPA during the VISION 2040 project.

**AIR QUALITY MITIGATION MEASURES
FOR PROJECT CONSTRUCTION IMPACTS**
September 7, 2005

This list is intended to assist project sponsors, the Clean Air Agency, and other participants identify appropriate air quality mitigation for project construction period impacts. It is not meant to be a comprehensive list of all measures that may be required. Not all measures listed, may be appropriate for every project.

R-004-018

Selection of the appropriate mitigation measure(s) depends on a number of factors including

- project design, size, and components
- construction period,
- existing transportation system,
- adjacent land use,
- impacts on travel in the region,
- existing air quality,
- available air quality mitigation technology
- available air quality programs, and
- specific identified impacts

MITIGATION MEASURES

- Use newer construction equipment and maintain all equipment in good mechanical condition to minimize exhaust emissions.
- When making construction contracts, require that contractors are using ultra-low-sulfur-diesel (available in Puget Sound), and have equipment that has been retrofitted with diesel control technology.
- Install emission reduction retrofit equipment for on-road and off-road equipment, i.e. Diesel Solutions participation by project sponsors and contractors
- Use Bio diesel fuel for vehicles and equipment
- Use alternative Fuel Vehicles and equipment
- Car pooling, CTR and other TDM programs for construction workers
- Build and operate transit facilities associated with the project early so they are available at project opening
- Build and maintain pedestrian and bicycle facilities associated with the project early so they are available at project opening
- Connect project pedestrian and bicycle facilities with existing pedestrian and bicycle systems
- Stage construction between separate projects to minimize regional emissions of pollutants during construction.
- Daytime construction curbs during hot days when region is at risk for exceedances

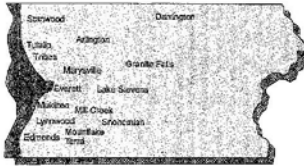
R-004-018

Thank you for providing this background information regarding the Agency's mitigation measures. This was a useful listing that was considered and provided valuable information to the process as PSRC worked to develop multicounty planning policies.

of the Ozone standards, (NAAQS)

- Implement construction truck idling restrictions, (e.g. No longer than 5 minutes.)
- Locate construction equipment away from sensitive receptors such as fresh air intakes to buildings, air conditioners, and sensitive populations
- Locate truck staging zones where diesel emissions won't be noticeable to the public or near sensitive populations such as the elderly and the young
- Spray exposed soil with water or other suppressant to minimize emissions of PM10 and prevent deposition of particulate matter.
- Cover all trucks transporting materials, wet materials in trucks, or provide adequate freeboard, (space from the top of the material to the top of the truck bed), to minimize PM10 and deposition of particulates during transportation.
- Provide wheel washers to remove particulate matter that would otherwise be carried off-site by vehicles to decrease deposition of particulate matter on area roadways.
- Remove particulate matter deposited on paved, public roads, sidewalks, and bicycle and pedestrian paths to reduce mud and dust.
- Cover project-site dirt, gravel, and debris piles as needed to minimize dust and wind-blown debris. Construct wind barriers to reduce wind velocity over exposed earth.
- Restrict the speed of construction vehicles when operating in areas of exposed earth.
- Route and schedule construction trucks to reduce delays to traffic during peak travel times to minimize air quality impacts caused by a reduction in traffic speeds.

Snohomish County
Tomorrow
A GROWTH MANAGEMENT ADVISORY COUNCIL



RECEIVED
JUL 31 2006

PUGET SOUND REGIONAL COUNCIL

July 26, 2006

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

Re: **COMMENTS FROM THE SNOHOMISH COUNTY TOMORROW
ORGANIZATION ON THE DRAFT EIS VISION 2020+20**

Dear Dr. Abbott:

R-005-001

Snohomish County Tomorrow greatly appreciates and supports the efforts of the Puget Sound Regional Council in leading the effort to update the regional Vision 2020+20 plan. This is a very important process and the result should help shape a positive future for the entire region. We are taking your request to comment on the DEIS as a serious responsibility and appreciate the opportunity to be involved. We understand the purpose of the Vision Plan is to provide a common framework for the region's leadership to coordinate efforts to provide the resources necessary to support the needs of a growing population. Further, we understand that the plan will provide regional guidance for future updates of countywide growth targets, countywide planning policies and local comprehensive plans.

As you may know, Snohomish County Tomorrow (SCT) is an interjurisdictional body comprised of the elected officials and staff of all the cities and towns, tribes and the county. It was established prior to the enactment of the GMA to foster cooperation and collaboration, resolve disputes, and serve as a forum to discuss issues related to cross-jurisdictional elements within Snohomish County. It is run entirely by the participating members, generally makes decisions on a consensus basis, and is supported by dues and effort from all participants. It also serves as a forum for the cities, towns, tribes and county to engage on growth management and regional issues such as the Puget Sound Regional Council's Vision 2020+20 planning efforts. As you also know, members of SCT serve on the Growth Management Policy Board (for example, Councilmember

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425-388-3311

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R-005-001

Thank you for your statement of appreciation for the VISION 2040 planning process, and for providing background on Snohomish County Tomorrow.

R-005-001

Donna Wright, Councilmember Dave Somers, Councilmember Bob Overstreet) and staff from Snohomish County jurisdictions serve on the Regional Staff Committee (Mary Lynne Evans, Steve Toy, Bill Trimm, and Allan Giffen).

Because of SCT's distinctive position, the organization decided to review the PSRC DEIS as a body, and has compiled comments that represent the entire organization's collective interest. This letter is a product of the elected officials, and staff from SCT member jurisdictions. It establishes SCT and its member cities as a party of record.

It is important to note that individual cities, towns, tribes and/or the county itself may submit individual letters of comment on the DEIS representing their own interests and becoming parties of record under the auspices of the State Environmental Policy Act.

THE DOCUMENT

R-005-002

The approach, the methodologies, the technical work and the shared information in the DEIS are impressive. PSRC is to be complimented on the high quality, innovation, and intelligence of the document itself. In the difficult environment of pulling together a diverse region with many stakeholders, this document provides a solid foundation for more dialogue and productive discussion. We look forward to the continuance of this process.

SHARED VALUES

In reviewing the growth scenarios presented as part of the DEIS, we believe there are a number of values that we in SCT all share, and are important to reflect in the preferred alternative. We request that they become criteria for establishing a preferred alternative and balancing impacts. Among these are:

R-005-003

1. Channel future urban growth into designated Urban Growth Areas with a full range of urban services.
2. Preservation and restoration of Puget Sound.
3. Preservation and respect for the distinctive historic settlement pattern of Snohomish County, including our historic downtowns and centers.
4. Present and future economic and social viability of all 22 cities and towns in Snohomish County and the County itself.
5. Retaining rural separation of some of our cities and towns.
6. Responsible stewardship of natural resource lands -- forest and mineral resources and a variety of agricultural areas.
7. Preservation of rural areas, which in Snohomish County function as invaluable agricultural production areas, flood storage areas, and are rich with aesthetic values.
8. Distinct vistas (mountains, shorelines, river valleys, forest backgrounds, towns) which are unique to Snohomish County and contribute to our high quality of life.
9. Preservation of critical areas and habitats, a prime value to us.
10. Preservation of our rich outdoor recreational opportunities, e.g., parks, camping, fishing, and hiking.
11. Encouragement of high quality educational systems to serve our citizens well.

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R-005-002

Thank you.

R-005-003

VISION 2040 now contains policies that address many of the items noted in this comment; note, however, that these were not added as formal evaluation criteria in the selection of the Preferred Growth Alternative, but are instead part of VISION 2040.

REGIONAL GEOGRAPHIES

R-005-004

In reviewing the DEIS, we understand that you have used a modality of "regional geographies" and that the Growth Management Policy Board decided to organize work on the VISION update around cities. We also understand that the Board selected cities as the unit of analysis because city comprehensive plans are one of the leading instruments used to implement the regional vision and that the Board decided not to attempt to do the analysis at the individual city level since this was beyond the means of the Regional Council. Instead, the Board decided to group the cities by size into the regional geographies by individual counties. This is an innovative way of explaining the alternatives and analyzing impacts to highlight the choices we all must make.

We want to emphasize that each county has developed in different ways and at different rates and the value of diversity should be embraced in the development of the preferred plan. We would like to see a coherent and positive regional vision, but one that recognizes our differences. It is in the details that the region can make a realistic assessment of opportunities, capacities and constraints.

As an example, Snohomish County has a distinct urban form, as do King, Pierce and Kitsap Counties. The southwestern cities form a nucleus of incorporated urban areas, historically tied to development in King County. In the central part of the county is Everett, the Vision 2020-designated metropolitan center, which is experiencing a revitalization of its downtown and transformation of its harborfront and riverfront elements as key centers of growth. Following up the I-5 corridor, the cities of Arlington and Marysville along with the Tulalip Tribal areas are quickly growing into a pattern of urban development. Finally, there are a number of free-standing cities and towns which have developed along major transportation routes, and are still separated by rural lands, such as Granite Falls, Darrington, Stanwood, Monroe, Sultan, Gold Bar, Snohomish and Lake Stevens.

Against the pattern of southwestern historical city/town development is a large area of unincorporated UGA land, surrounding the cities. This unincorporated urban growth area in SW county presents both a challenge (managing growth) and an opportunity (linking and building on existing urban communities and restoration of degraded natural areas). Southwest cities have designated Municipal Urban Growth Areas indicating geographic areas of individual jurisdictional interest that may be subject to future annexations and to encourage infill and redevelopment to various city standards, unique to each city. Although the DEIS treats the unincorporated urban growth area as a single regional geography, we want to emphasize that the SWUGA city/county comprehensive plans are the official public documents that address future uses, densities, service provisions and annexation and development of the area.

R-005-005

We respect that each of our cities has a unique history in Snohomish County. For the freestanding cities, we wish to keep them viable and separated. For the SW area, even if these cities have been encompassed by unincorporated urban development at this point, most cities are interested in annexing these areas and assuring development consistent with the character of the city. Therefore, we would encourage PSRC to craft a preferred alternative which recognizes the uniqueness of Snohomish County, minimizes environmental impacts and serves the other counties as well. This should note historical growth patterns, reinforce the viability and separate character of free-standing cities, encourage the opportunity of linking existing SW urban communities with

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R-005-004

The Preferred Growth Alternative combines many of the best elements of the other alternatives published in the Draft EIS, including the Growth Targets Extended. The PGA seeks to bend trends, and result in a growth pattern that is both ambitious and achievable. At the same time, the PGA builds upon local plans, and implementation of the PGA will be accomplished through local plans, which provides the opportunity to ensure that the regional VISION is implemented in a manner responsive to local situations, such as those described in Snohomish County and its southwest UGA. Note also that local area issues were considered during the process to develop the PGA.

R-005-005

See previous response.

- R-005-005** | the SW unincorporated areas, encourage compact urban development, and contain sprawl from moving outward along our major highways.
- R-005-006** | The use of regional geographies has served a useful purpose in identifying distinct alternatives for the DEIS. The approach in the DEIS of assigning assumed percentages of growth to regional geographies should not be used as a regional growth strategy. The selection of a preferred alternative should begin with the adopted Vision 2020 centers based concept and be refined as necessary to shape the land use pattern, economic strategy and transportation system that most benefits the region, while protecting our unique environment and quality of life.
- GROWTH ASSUMPTIONS AND ALTERNATIVES
- R-005-007** | (1) We understand the alternatives are bookends for a range of growth scenarios to be refined in the form of a preferred alternative. Each alternative identifies impacts. However, it is striking that the document does not give realistic mitigation measures to address impacts. These mitigation measures would likely take the form of implementation actions, such as funding alternatives, changes to applicable laws, incentives for directing growth, regional approaches to financing, suggestions for governance, etc. While we realize such mitigation measures/implementation actions are likely to come in the SDEIS, it is difficult for us to see how the alternatives based only on assumed percentages of growth distributed to the regional geographies can withstand the pressures of a real estate marketplace.
- Therefore, we encourage PSRC to consider in the SDEIS and FEIS mitigation measures which could translate into actions to implement the plan.
- R-005-008** | (2) GMA mandates that population growth target setting begin with OFM giving the population range in a target year. The County, with input from its cities, then selects a number from the range, and identifies how each jurisdiction will accommodate its individual target. Snohomish County and its cities have a process by which this is accomplished. We have just recommended the 2025 population reconciliation to the County Council. This was a collaborative process. It does not appear that PSRC used the SCT reconciliation to develop the regional assumptions. We expect that in the SDEIS the assumption will not conflict with our 2025 projections and the 2040 numbers will be a logical extension.
- R-005-009** | Overall, SCT believes the population assumption for all four counties in the DEIS is reasonable, as it is an extension of the OFM 2025 intermediate forecast, which we have been planning under. Although we realize the Vision covers a very large geography and is much less detailed than local comprehensive plans, we believe the regional share of population directed to Snohomish County as compared to the other counties is too low in several of the alternatives. For example, Snohomish County jurisdictions have just adopted GMA plans that will handle more growth to 2025 than PSRC Alternative 2 does to 2040. We believe it is highly unlikely that any alternative can devise strategies which will hold the growth coming into Snohomish County. We believe it is highly unlikely that Snohomish County jurisdictions will want to revisit and downzone/reduce Urban Growth Areas (UGA's) after just finishing our GMA 10 year plan updates. Therefore, we believe that a historically valid 25% share of the region's population growth should be used for continued planning for Snohomish County.

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R-005-006

Not using regional geographies was considered during the VISION 2040 process and was rejected. The regional geographies provide a useful way to analyze and plan for the region. Also, the PGA does incorporate the centers concept from the earlier VISION.

R-005-007

VISION 2040 and the FEIS speak to the relationship of the MPPs and EIS mitigation measures to the implementation of the PGA.

R-005-008

SCT reconciliation was addressed and worked on by a technical advisory group of local jurisdiction staff that was formed by the PSRC to help in developing the PGA. This group included staff from Snohomish County.

R-005-009

As the Preferred Growth Alternative was developed, this issue was addressed. See previous response. Also, see the PGA Technical Packet in FEIS Appendix I-A.

R-005-010

(3) The growth assumptions assigned to individual cities within the appendices under various alternatives are also problematic. They do not reflect either newly adopted comprehensive plans or land capacity analyses. Most of the alternatives assume that growth will be accommodated within existing city boundaries. The capacity for city growth through annexation of unincorporated UGA areas is not analyzed. All but a small fraction of the unincorporated land base within all the Snohomish County UGA's is assigned to various cities. The areas are able to accommodate more growth than projected in PSRC Alternatives 2 and 3. The County's plan for the unincorporated SW UGA's allows for higher densities, reducing pressure on rural and resource lands. We would suggest reviewing the SW incorporated and unincorporated UGA holistically, and incorporating a distinctive growth strategy for it.

R-005-011

(4) We find some assumptions of Alternative 4 and Alternative 1 to be unacceptable as a preferred growth alternative. Under Alternative 4, 4% of the growth is assumed to go to metropolitan cities. We believe this is too low and the preferred alternative must support increased growth in the metro cities. Conversely, in Alternative 1, 22% of the growth is assumed to go to rural areas. This too is unacceptable. Snohomish County has been lowering its rural growth rate since 1995, a major priority of its plan. The County achieved an actual reduction from 28% to 13% in the ten-year planning period. In the 2025 update the County aspires to continue the present rural growth share of 15% or less. We ask that the preferred alternative not adopt either of these disputed assumptions but instead reflect our thoughts here.

ALTERNATIVES

R-005-012

In relation to the alternatives, the DEIS implies that assuming more growth goes to unincorporated UGA's has greater negative impacts. In Snohomish County's SW UGA, our largest unincorporated UGA, the area is already urbanized and many cities are planning on annexing and serving it. As noted above, infill and redevelopment of this area into higher densities reduces the pressure to sprawl into rural and resource land. The preferred alternative and SDEIS should not characterize growth in this unincorporated UGA as sprawling, since this area is already urbanized, has great infill potential for higher densities and is slated to be annexed by cities, consistent with GMA.

In fact, Snohomish County is presently working with the cities to develop a set of annexation policies that will speed and smooth annexations in unincorporated urban areas.

R-005-013

We disagree with the DEIS analysis which shows the Growth Targets Extended promotes sprawl. This alternative assumes 20,000 more jobs in Everett than the Metropolitan Cities alternative, which is purported to have the greatest concentration of population and jobs in the metropolitan cities, stemming sprawl. Since Everett is the only metropolitan city in Snohomish County, this appears to be a flaw in the alternative.

R-005-014

We also note that the Growth Targets Extended for Snohomish County has the poorest jobs to population ratio (0.4:1) of all the alternatives. Conversely, the Smaller Cities alternative has the highest (0.64:1), apparently due to the large number of cities in the county classified as smaller suburban cities. We believe that the County can no longer rely on employment assumptions based on historical trends. Employment is not a zero sum game. Instead, the Prosperity Partnership anticipates 100,000 new jobs by 2040.

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R-005-010

The reference to individual city numbers in the alternatives was removed when addressing these types of issues.

R-005-011

Comment noted regarding your concerns pertaining to these alternatives.

R-005-012

Growth is not assigned to unincorporated urban areas at the potential annexation area level. The Regional Growth Strategy does, however, state a preference for growth in the unincorporated urban areas to be in areas affiliated for annexation rather than those unaffiliated, in order to promote the affiliation of all of these areas with cities for annexation. Additional detail regarding the Regional Growth Strategy's figures, particularly in the tables "Snohomish Employment" and "Snohomish Population," can be found in FEIS Appendix I-A.

R-005-013

The discussion of the Growth Targets Extended Alternative focused on the disparate locations of population from employment, rather than a characterization of the alternative as "sprawl." PSRC worked to address these local issues through the process to develop the Preferred Growth Alternative, which included the formation of a technical advisory group consisting of local government staff.

R-005-014

See the previous responses to comments regarding localized assumptions in the alternatives and PSRC's formation of a technical advisory group that assisted staff in developing the Preferred Alternative. Also, see next response (R-005-015).

- R-005-014** | Snohomish County metropolitan centers and cities want a larger share of employment, a higher job/housing ratio overall for the County.
- R-005-015** | Our current imbalance between jobs/housing creates inordinate demands on transportation systems and impacts our region's air and water quality because of the 100,000 daily commuter trips to King County. We support a preferred alternative that assumes more jobs locate in a variety of centers in Snohomish County, including the metropolitan center of Everett, and with the application and approval by the PSRC Growth Management Policy and Executive Boards, the designation of a new Manufacturing Industrial Center in Marysville/Arlington Tulalip area. Overall, we support opportunities for additional growth to be concentrated in our metro city and other cities and centers with the full range of urban services. This would promote better jobs-housing balance, reducing commuter trips into King County and attendant transportation and air quality impacts. With more jobs assumed to go growth centers in cities, citizens could work closer to home. The viability of the smaller cities would also be supported with a better employment and tax base. The current effort to site a four-year institution of higher learning in Snohomish County would further support increased employment and better jobs/housing balance.
- R-005-016** | Hand in hand with this concentrated alternative will come the need for additional infrastructure and services. Local government will need additional funding tools for infrastructure and public services. The regional transportation investment strategy should increase the proportion of funding to infrastructure supporting job growth. Commuter rail, light rail and other transit services should serve the largest employment centers such as SW Everett-Boeing-Paine Field MIC, downtown Everett, Bothell's Canyon Park, Lynnwood, and the Marysville, Arlington, Tulalip Tribal area and the new college/university, when sited and built. Both light rail and the university should be constructed within the 2040 time frame.
- In addition, there will be a need for channeling transportation funding to connecting links between employment centers and between urban centers. This includes supporting connections east-west across Snohomish County and trans-Sound modalities of ferry and transit.
- PREFERRED ALTERNATIVE
- R-005-017** | The existing Vision 2020 regional growth and transportation strategy is based on the concept of increasing population and employment significantly in designated centers. Focused transportation investments support growth of the centers. This strategy has been the official policy of the Multi-County planning policies, countywide planning policies and local comprehensive plans. It should continue as a good starting point for development of the preferred alternative.
- R-005-018** | Snohomish County may decide to apply for the designation of additional urban and manufacturing centers such as the north county Marysville, Arlington and Tulalip Tribal areas. Freestanding cities should be given modest UGA adjustments, consistent with their 2025 plans. A larger job/housing ratio must be targeted for the county. The County must retain its regional growth share of 25%, and rural growth must not exceed the 15% noted in the County's 2025 plan and should decline below 14% as we near the horizon of 2040. Concentrated growth in metropolitan centers should include Everett with substantial population and employment assumptions.

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R-005-015

VISION 2040's Regional Growth Strategy is based on promoting a closer balance between housing and jobs at the regional geography and county levels. This involves adding housing to job-rich areas and adding jobs to housing-rich areas. Also, VISION 2040 contains multicounty planning policies that recognize the importance of creating a job/housing balance and connections between housing areas and employment areas. Lastly, comment noted regarding an educational institution.

R-005-016

VISION 2040 calls for prioritizing funding in centers. Also, VISION 2040 actions call for collaborative work at the regional level to seek to create additional resources for infrastructure.

R-005-017

Centers continue to be an integral part of VISION 2040 and its Regional Growth Strategy.

R-005-018

The Preferred Growth Alternative responds to these comments. VISION 2040 actions call for evaluating both regional growth and manufacturing/industrial centers. VISION 2040 also recognizes the role of subregional centers and other more local central places.

R-005-019

Revised assumptions about the ability of local governments to provide infrastructure and services must be noted in the preferred alternative. Mitigation measures/implementation actions are essential to achieve environmental protection, good quality design and construction, mixed use, and adequate services and need to be addressed in the SEIS of the preferred Alternative. A realistic assessment of the area to accommodate growth must accompany the preferred alternative.


We would appreciate some discussion of how environmental mitigation will be accomplished and which agency (agencies) might be assumed to take the lead.

Again, we appreciate the opportunity to comment. We look forward to the incorporation of our suggestions into the preferred alternative. If you have any questions, please do not hesitate to call Brian Sullivan at 425-388-3142.

Sincerely yours,



Aaron Reardon
Co-Chair
Snohomish County Tomorrow



Douglas Thorndike
Co-Chair
Snohomish County Tomorrow

R-005-019

See response to comment 016 regarding infrastructure funding. Also, see the EIS mitigation, cumulative effects, and VISION 2040 multicounty planning policies, which are designed to help implement the Preferred Growth Alternative in a manner that minimizes some of the impacts of growth.

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

July 27, 2006

Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, Washington 98104-1035

Attention: Norman Abbott, SEPA Responsible Official

RE: Vision 2020 Update DRAFT Environmental Impact Statement
May 2006

Dear Mr. Abbott:

Thank you for the opportunity to review the Council's Draft Environmental Impact Statement (EIS). Soos Creek Water and Sewer District is one of the fastest growing districts in the State. Located in south King County, and covering areas within the cities of Auburn, Black Diamond, Covington, Kent, Maple Valley, and Renton, as well as unincorporated King County, the District serves almost 100,000 customers. It is a leader in planning for the future and providing cost-effective services to its customers. We evaluate our existing and future facilities and coordinate with the local land use authorities as needed in order to accommodate future growth within our service area. With that approach in mind, we reviewed the Vision 2020 Update, Draft EIS, dated May 2006. The two alternatives that could significantly impact the District are the Large Cities and Smaller Cities alternatives. Therefore, we submit the following comments for your consideration:

Public Services and Utilities
Section 5.7.1.2 Sanitary Sewer
Page 5.7.3, Paragraph 4

"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 a special district usually extend beyond the boundaries of potential annexation and therefore, historically, the provision of sewer service has not changed dramatically."

- The District requests that language be added at the end of this paragraph, which would clarify the purpose of special districts within the Puget Sound area. The following language (in bold text) is suggested for insertion:

"These special purpose districts are therefore 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 jurisdictions where service might not otherwise be available."

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www.sooscreek.com

R-006-001

Thank you for the additional information, which has been added to the Final EIS.

R-006-001

R-006-002

Additional information on service districts has been added to the Final EIS discussion.

Norman Abbott
July 27, 2006
Page 2

SOOS CREEK WATER & SEWER DISTRICT

Section 5.7.1.3 Water Supply
Primary Water Sources and Water Supply
Page 5.7.5.

R-006-002

- The District requests that the following paragraph be inserted after the first paragraph in this 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."

Adding the suggested language in both the Sanitary Sewer and Water Supply sections will provide consistency between the water and sewer sections of the EIS. While cities can be the 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.

We have included a map to help depict this information visually. If you would like additional copies, please let me know.

Thank you for the opportunity to comment on the Vision 2020 Update, Draft EIS. We look forward to reviewing the Final EIS due out early next year. 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

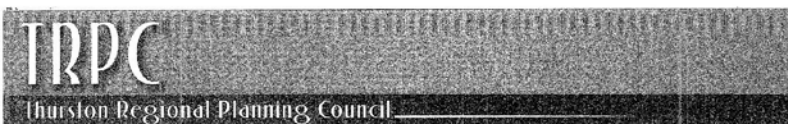
Attachment

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

(see attached map in original letter files)

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Executive Director

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July 28, 2006

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 2020 Update

Thank you for the opportunity to review and comment on the Vision 2020 Update. We commend Puget Sound Regional Council (PSRC) for undertaking such a comprehensive update of this plan. We found the extensive documentation informative and helpful. Clearly, PSRC is interested in conducting a process that is inclusive and forward thinking.

There may be questions as to why the policy makers and elected officials on the Thurston Regional Planning Council (TRPC) have such an interest in your draft Environmental Impact Statement. Our analysis and indicator data strongly indicates that growth patterns and transportation needs in the South Puget Sound region are directly related to land use and transportation activities in the central Puget Sound area. How the central Puget Sound region grows – and plans to grow – matters to our region. It influences the challenges and the opportunities we face in implementing our own growth strategies and in responding to changing market forces. In turn our proximity, land availability, and housing affordability create their own influence on PSRC's ability to achieve adopted growth strategies. We have a vested interest in the direction and successful implementation of each other's growth plans.

PSRC is well respected for your leadership and innovation. The draft EIS for the Vision 2020 Update does not disappoint in that regard. It represents visionary leadership, responsive and responsible governance, and a desire to work towards a sustainable future. It is also a plan that should be recognized for having impacts and benefits far beyond the central Puget Sound region. We appreciate the difficult choices and hard work you face in developing a preferred

Providing Visionary Leadership on Regional Plans, Policies and Issues

R-007-001

PSRC appreciates your supportive comments regarding the VISION 2040 planning process, and appreciates the strong interest TRPC has in helping our two urban areas grow in a complementary manner. As PSRC continues to develop more specific actions for implementing the plan, we look forward to continued collaboration with TRPC.

Mr. Norman Abbott, Director
Vision 2020 Update
Page 2
July 28, 2006

R-007-001

alternative. We are confident that your conclusions will reflect the same high level of quality and balance PSRC is known for.

Attached are our comments and questions in response to the draft EIS. They reflect the informed input of TRPC's regional policy makers and build on previous work we have undertaken to better understand and manage our growth. The comments and questions are admittedly biased towards the needs of the Thurston region. However, we believe they will prove useful as you consider alternatives and methods for evaluation in developing a preferred alternative for the central Puget Sound region. Please advise Lon Wyrick, TRPC Executive Director, if you need any additional information or clarification on this input.

We look forward to continued collaboration and coordination between our two regions, and wish you well in the next steps of your Vision 2020 Update.

Sincerely,



Ken Jones, Mayor of Tenino
Chair, Thurston Regional Planning Council



Doug Mah, Olympia City Council
Chair, Transportation Policy Board

57-11

Enclosure

cc: Bob Drewel, Executive Director
Mark Gulbranson, Deputy Executive Director
Charlie Howard, Transportation Planning Director

Vision 2020 Update – Draft EIS
Comments and Questions from Thurston Regional Planning Council

TRPC conducted a review in June and July of the four alternatives as presented in the Draft Environmental Impact Statement (DEIS). The focus of our review was primarily on the growth distribution alternatives. We reviewed the four alternatives and their associated land use and transportation impacts, and considered how each of them may affect future growth and transportation needs in the Thurston region.

This review was a natural extension of previous work recently concluded by our Vision Reality Task Force. A significant finding of that previous work is that growth pressures from the central Puget Sound region have major influences on market forces and transportation demand in this region.

Comments and questions are organized by topic area.

Vision Versus Reality

R-007-002 **COMMENT:**
Recent analyses conducted by TRPC pointed to several disconnects between the way this region intended to grow – as spelled out in adopted Comprehensive Plans – and what has actually occurred in the Thurston region since adoption of those plans. It has forced this region to increase its efforts to achieve some of the elements of the vision, and to consider innovative tools and approaches if we're to achieve our stated vision. This causes us to ask some very basic questions about the ability of central Puget Sound communities to achieve the goals outlined in *Vision 2020* in order to better understand the potential effects of extending that plan or changing direction.

QUESTION:

How close has growth in the central Puget Sound region tracked with adopted land use plans? Are all communities achieving the same level of results? If all growth objectives are not being met, what does that mean for assumptions behind any of the four alternatives? Clarity as to how well vision and reality are tracking is key to evaluating how realistic any of the four alternatives are or how viable a preferred alternative is. If the preferred alternative assumes higher levels of achievement, it would be helpful to know what tools agencies will rely on to better achieve those objectives.

Market Factors

R-007-003 **COMMENT:**
Market forces are clearly linked to the ability of any region to achieve its vision for growth. While applauding the environmental framework within which the *Vision 2020 Update* was created, we questioned how land values and market forces were considered in developing and evaluating the alternatives. It was not readily apparent that market forces would result in the outcomes suggested by the environmental framework analyses.

QUESTION:

We encourage PSRC to evaluate the effects of market forces on outcomes suggested by the environmental framework. If outcomes suggested by the environmental framework used to develop the alternatives are not consistent with market force mechanisms, what measures will bring the two into alignment as a part of the preferred alternative?

R-007-002

As part of the process to develop the Preferred Growth Alternative, PSRC formed a technical working group that included local government staff to assess growth trends, comprehensive plan and target trends, sector trends, and more, to ensure that the PGA would be both ambitious and achievable.

R-007-003

VISION 2040 represents regional guidance rather than a local or comprehensive plan level of analysis. VISION 2040 covers a very large geography, looks very long range, and is less detailed than local comprehensive plans. Subsequently, the appropriate local role is for local comprehensive plans and the targeting process to then determine how it works; for example, considering market forces in each jurisdiction.

R-007-004 COMMENT:
Another market force factor concerns the price and availability of fuel. We realize that the future is cloudy, at best, when it comes to fuel pricing and the impact on travel demand. However, with fuel prices in the forefront of public awareness it may be useful to stipulate how future uncertainties could influence any of the alternatives.

Population and Employment Forecast and Distribution Assumptions

R-007-005 COMMENT:
The Thurston region is experiencing significant growth pressure along the I-5 and SR 507 corridors which appears to be related in large measure to Pierce County growth. Presumably Alternatives 2 and 3 may generate less spin-off demand for housing in the Thurston region if the growth envisioned for Pierce County is reduced by about half.

QUESTION:

How does the Thurston region, its availability and cost of land, and its proximity influence forecasts and assumptions for the central Puget Sound region? What influence, if any, did PSRC assume the Thurston region would have on each of the distribution alternatives for the central Puget Sound region? What assumptions are made regarding a preferred alternative?

R-007-006 *Fort Lewis is a major employer whose influences are felt far beyond the immediate military reservation, both in terms of employment as well as residential demand. How are assumptions about Fort Lewis employment and residential demand reflected in each of the distribution alternatives, especially as they relate to Pierce County growth?*

R-007-007 *How closely have previous population and employment forecasts tracked with real growth? Have past assumptions held up or has PSRC's forecasting team noticed changes in recent forecast cycles? Do the forecasts PSRC is planning for fall within the low, medium, or high growth scenarios?*

Employment Distribution

R-007-008 COMMENT:
In our review of the land use alternatives we were struck by the significant shift of future employment under Alternative 4 to outlying communities. This raises questions for us concerning the feasibility of directing so much employment growth to these smaller suburban cities and urban growth areas, as well as the effect such a distribution might have on neighboring regions.

R-007-009 Common to all four alternatives is a strong employment growth assumption. We were somewhat surprised at the underlying forecast assumption that seems to suggest that for every new resident the central Puget Sound region will attract roughly 0.7 new jobs. That seems somewhat aggressive over the long term but without a clearer understanding of how closely past forecasts have tracked with actual growth we are unable to assess whether or not that is realistic.

TRPC Comments on Draft EIS, Page 2

R-007-004

The Final Environmental Impact Statement has a chapter on energy, which addressed petroleum, electric, natural gas, and conservation and their effects on implementing the growth distribution alternatives. Also, it addresses issues such as fuel prices in the cumulative effects discussions.

R-007-005

VISION 2040 is based on a regional growth forecast, which is based in part on larger growth trends outside the region. Also, the Final EIS has been updated to include more discussion of transportation effects and trends for travel into and outside the region.

R-007-006

The PGA Technical Packet was developed to include more information regarding military employment. Additionally, VISION 2040 policies address military bases and incompatible adjacent uses.

R-007-007

As part of the process to develop the Preferred Growth Alternative, PSRC formed a technical working group that included local government staff to assess growth trends, comprehensive plan and target trends, sector trends, and more, to ensure that the PGA would be both ambitious and achievable.

R-007-008

Each of the alternatives is meant to be conceptual, and for the purposes of the FEIS analysis, the alternatives are meant to contain "bookend" assumptions. The Smaller Cities Alternative represents one end of the bookends.

R-007-009

QUESTION:

What is the character of employment growth assumed in Alternative 4? What kinds of jobs would be likely and/or appropriate to locate in the outlying communities, and what means of achieving this objective would be necessary? Would this distribution of employment to outlying areas in Alternative 4 tend to make Thurston County (and other adjacent regions) more attractive or less attractive to future residential and commercial growth?

Housing Distribution

R-007-010

COMMENT:

You have done an excellent job of describing the different patterns of housing distribution envisioned in each of the four alternatives. This was helpful to us in evaluating the alternatives. We have heard from our private sector partners that much of the demand they are responding to in our communities is directly related to consumer demand for housing products and affordability in the central Puget Sound region.

Of particular note to us was the seeming lack of single-family housing choice provided by Alternative 2 compared to Alternatives 1, 3, or 4. This alternative seems likely to exacerbate the unmet demand for affordable single family housing in central Puget Sound that is driving so much of the demand we are experiencing in the Thurston region. In comparison, Alternative 3 seems to provide the best balance of housing choices within the central Puget Sound region. This may have the effect of reducing some of the externally-generated demand for single family housing in Thurston County.

QUESTION:

How does the proximity, housing market characteristics, and rate of growth in the Thurston region factor into your forecast and distribution assumptions for housing?

How will the lack of housing choices supported by Alternative 2 affect the demand and affordability of single family housing in adjacent regions such as Thurston County?

Transportation Considerations

R-007-011

COMMENT:

The Thurston region is nearing completion of its first passenger rail study. In the course of that work we looked at potential future commuter rail connections with the central Puget Sound and began to ask important questions about the relationships between our two regions, the viability of rail, and measures we can take to preserve maximum future flexibility. We found it significant that in the year 2000, over 30,000 of our residents commuted out of Thurston County every day, with well over half of those going to destinations in Pierce County. We're projecting that outbound commute will swell to 60,000 daily by the year 2025, with 85% bound for destinations in Pierce and King Counties. The numbers are lower for inbound commute, but the vast majority currently arrives from Pierce and King Counties.

Alternatives 2 and 3 are potentially supportive of passenger rail service into Thurston County.

R-007-012

QUESTION:

Recognizing that PSRC is a national leader in conducting full-cost transportation analyses, how do the costs associated with the four alternatives bear out? Are they cost-neutral but with different distributions of costs between sectors and modes? Has any analysis been done to

R-007-009

All of the alternatives use the same regional forecast, which was developed by PSRC. For more information, visit the "Data & Forecasts" section of PSRC's website, psrc.org.

R-007-010

Your comments regarding the effects of the alternatives on regions outside the central Puget Sound are noted. Also, see responses to previous comments regarding the effect of growth outside the region on regional forecasts. Note that the analysis in the FEIS indicated that there could be more affordable units, although they might not be single-family.

R-007-011

Comments noted. Note that the FEIS transportation chapter has been updated to note the issue of cross-county travel. For an issue as specific as passenger rail service to Thurston, the Destination 2030 update provides an opportunity to further consider the issue.

R-007-012

VISION 2040 used the adopted metropolitan transportation plan, Destination 2030, as the transportation network for the purpose of analyzing the alternatives. At the time of the adoption of VISION 2040, the PSRC will be in the process of updating the Destination 2030 to bring it into alignment with the VISION. The issue of costs will be more fully addressed in the update of Destination 2030.

R-007-012

estimate the external demand for transportation facilities and services associated with each alternative?

R-007-013

There is increasing public interest in connecting the southerly and northerly reaches of Puget Sound to Tacoma and Seattle via waterborne transport. Is this factored into your analysis of travel demand and costs in this process?

R-007-014

Since the Cross-Base Highway is an active project, doesn't it make Alternative 4 somewhat inevitable in terms of south Pierce County growth? What means would be required to achieve Alternatives 2 or 3 with the Cross-Base Highway a feature of the future transportation system?

Implementation Tools

R-007-015

COMMENT:

Tools to effectively implement any growth strategy or plan are at least as important the vision itself. We understand that the lack of tools available under the Growth Management Act challenge the ability of local and regional agencies to achieve their visions.

QUESTION:

What additional tools are needed to help PSRC and its communities achieve the collective growth vision that will result from this process? Are there any legislative hurdles that impact the ability of the central Puget Sound region to achieve its preferred future? In what ways can TRPC and communities within the Thurston region work with PSRC to gain support for legislative solutions to these hurdles?

R-007-013

See previous response regarding Destination 2030 investments in the VISION 2040 update.

R-007-014

See previous response. We do not concur that Cross-Base Highway makes South Pierce County growth inevitable, although it can create an opportunity for additional growth. The update of Destination 2030 will provide the opportunity to address the question regarding the impact of the Cross-Base Highway.

R-007-015

See VISION 2040's Implementation section and the actions for more information on actions and measures. Also, note that local comprehensive plans and countywide planning policies will be an important element of implementing VISION 2040. Lastly, VISION 2040 calls for coordinated efforts to create financial resources for areas accommodating growth.



STATE OF WASHINGTON

DEPARTMENT OF COMMUNITY, TRADE AND ECONOMIC DEVELOPMENT

128 - 10th Avenue SW • PO Box 42525 • Olympia, Washington 98504-2525 • (360) 725-4000

July 31, 2006

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

RE: Comments on the Vision 2020 Update

Dear Mr. Abbott:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) on the update to *Vision 2020*. The Puget Sound Regional Council has long been a leader in regional planning, and in implementing the Growth Management Act (GMA). We are impressed with the breadth and depth of the issues considered in this regional planning undertaking. We especially like the following:

- S-001-001** • Thank you for a thoughtful and well-developed DEIS on how the Puget Sound region should grow over the next 35 years. As people and businesses continue to be attracted to the vibrant economy and natural beauty of this region, we have the opportunity to look ahead and make choices that we hope future generations will be glad we made. One of the decisions you have already made to confine the range of alternatives in the DEIS is the assumption that urban growth boundaries will not change for the life of the plan. By making this decision, you have set the outer limits of urban growth and deflected new population inward to already developed areas, protecting valuable and fragile natural systems and open space. This choice will unquestionably intensify urban levels of development which can allow for more cost-effective provision of infrastructure, provide greater opportunities for a fully multimodal transportation system, enable a wider range of housing choices, and provide for greater protection of environmentally sensitive areas. These are among the most basic goals of the GMA.
- S-001-002** • In addition to the basic goals of the GMA mentioned above, we appreciate the DEIS analysis includes a discussion of environmental justice. The assessment of affordable housing and transit availability for minority and lower income groups, as well as economic opportunity for disadvantaged and unemployed people will help the regional plan to be consistent with other goals of the GMA.
- S-001-003** • The issue paper on planning for rural areas demonstrates an understanding of rural areas and the need to identify and protect rural character. It also demonstrates that provisions for rural development in this region may have different implications, in regards to traffic and other impacts, than other places in the state.

We have the following suggestions as you continue to update Vision 2020:

- S-001-004** • The DEIS states that you have been encouraged to develop an environmental framework for this regional vision. One of the cornerstones of the GMA is that "the land speaks first." The *Vision 2020* update

S-001-001

Thank you for your comment.

S-001-002

Thank you for your comment.

S-001-003

Thank you. The issue papers have served as building blocks for both the evaluation of alternatives and the development of mitigation measures and supporting policies for the Preferred Growth Alternative.

S-001-004

PSRC developed the baseline in large part to help stimulate the discussion of how larger-scale ecological processes should shape the region's choices about growth. It serves as the framework for the rest of the document. To further support the ongoing decision-making as county and local governments continue their long-range planning following the adoption of VISION 2040, the plan also includes environmental multicounty planning policies.

Mr. Norman Abbott
July 31, 2006
Page 2

S-001-004 represents a significant opportunity to look at landscape-scale ecological processes and let nature guide decisions about where and how to plan for a growing population. The GMA's best available science requirement obligates local governments to seek out and use science to protect the functions and values of critical areas. The Regional Environmental Baseline chapter of the DEIS provides an interesting discussion of how the PSRC could provide leadership and assistance in understanding and protecting the functions and values of natural systems in the region. We encourage you to consider how science-based regional leadership could help guide difficult political decisions in this process.

S-001-005 • One of the effects of more people living within a defined and static urban area is that infill and redevelopment will be essential components of providing for more homes and jobs. This will be expensive and not without difficulty, especially in suburban areas without urban levels of infrastructure. We encourage the council to provide technical and financial assistance in this process, particularly in suburban areas where significant investment in public facilities will be necessary.

S-001-006 • Redevelopment at great intensities will require greater attention to building and street design, and to planning for public and non-motorized transportation. The design of public spaces can do much to mitigate the effects of more intense levels of urban development. We encourage the council to consider providing design assistance and other tools and examples that communities can adapt for their own use to retain the green infrastructure to this region, and the achieve high-quality human-scale design so important to the success of urban living. We appreciate that health is woven through the DEIS, and encourage you consider the opportunities for physical activity for transportation and recreation as an important component of the health analysis.

Congratulations to your staff for the work involved in this update process. We look forward to continuing to participate in this process and would like to extend an offer technical assistance as this process goes forward. We extend our continued support to the Puget Sound Regional Council in achieving the goals of growth management.

Sincerely,

Anne Fritzel
Senior Planner
Growth Management Services

AAF:hw

cc: Harriet Beale, Puget Sound Action Team
Pam Erstad, WDFW
Erik Stockdale, NW region, Department of Ecology
Leonard Bauer, Managing Director, Growth Management Services, CTED
David Anderson, Review Team and Technical Assistance Manager, CTED
Ike Nwankwo, Financial and Technical Assistance Manager, CTED

S-001-005

VISION 2040 and the multicounty planning policies encourage development within the areas targeted for growth, which in the Preferred Alternative is focused on established urban areas, where infill and redevelopment will be important. PSRC has also identified a work program to help refine and implement many of the mechanisms needed to achieve 2040. These include technical support and research on best practices that are designed to help local governments accommodate growth.

S-001-006

In addition to the SDEIS text that originally identified these types of strategies for desired growth patterns and urban form, VISION 2040, particularly the multicounty planning policies, provide additional emphasis on how human-scale design, green development, and other urban design best practices can be used. PSRC has also identified an implementation work program to help share tools and technical expertise among its members.



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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August 2, 2006

RECEIVED
AUG 7 2006

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

PUGET SOUND REGIONAL COUNCIL

Received from Dept. Ecology

Dear Mr. Abbott:

The Department of Ecology (Ecology) has reviewed the Puget Sound Regional Council (PSRC) VISION 2020 Update Draft Environmental Impact Statement (DEIS). We are providing comments based on a focused review of the DEIS and considering our participation on the Ad Hoc Environmental Advisory Group for the VISION 2020 Update.

Vision 2020 Update addresses the question of "where" projected growth, by 2040, should and should not occur in King, Snohomish, Pierce, and Kitsap Counties; and considers "how" development should take place. The draft EIS examines four growth alternatives which respond to the question of "where". The multicounty planning policies which will be examined more thoroughly in a supplemental DEIS, will respond to the question of "how." Following completion of Vision 2020 Update, Destination 2030 (existing transportation plan) will be extended to 2040 and amended to address the preferred growth alternative.

Ecology supports the efforts of PSRC to better integrate environmental issues/planning with land use planning. We believe understanding and addressing the long-term indirect environmental ramifications of early planning decisions can effectively avoid or reduce many potential indirect and cumulative environmental effects that eventually occur with projects. We believe these effects would be much more difficult to address if thorough environmental analysis only occurs at a project stage.

We believe the "environmental baseline" and "environmental framework" are two very strong elements of the analysis and the DEIS. Our comments are offered as "opportunities" to make the document even better and more useful: 1) for the decisions that will be made as part of the Vision 2020 Update and 2) as a solid foundation of environmental understanding for future decisions and associated environmental analysis.

S-002-001

Thank you for your positive comments regarding the VISION update and its Environmental Baseline. As noted in your comment, VISION 2040's environmental framework and policies will help integrate these issues into other PSRC planning activities such as the update to Destination 2030.

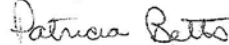
S-002-001

Attached are specific comments for your consideration:

- Regional environmental planning
- Purpose and need
- Range of alternatives
- Preferred alternative
- Criteria for evaluating growth distribution alternatives
- Affected environment, environmental consequences
 - Induced travel and induced growth
 - Water supply availability
 - Energy availability
 - Seismic hazard areas
- Mitigation
 - Ecosystems
 - Low impact development and sustainable building
- Monitoring
- Multicounty Planning Policies
 - Measurable objectives
 - Best available science
- Future planning and decision-making

We welcome the opportunity to continue to work with PSRC as your effort progresses. If you have any questions regarding our earth, water supply, energy, or low impact development comments, please contact Vicki Colgan in our Northwest Regional Office at (425) 649-7224. If you have any other questions, please feel free to contact me at (360) 407-6925.

Sincerely,



Patricia Betts
SEA Program

06-4644
Enclosure

cc:
Terry Swanson, Ecology HQ SEA
Geoff Tallent, Ecology NWRO SEA
Barbara Ritchie, Ecology HQ SEA
Vicki Colgan, Ecology NWRO

WA DEPT. OF ECOLOGY
VISION 2020 Update
Draft Environmental Impact Statement

S-002-002 | Regional Environmental Planning

The DEIS identifies some possible roles for the Regional Council in future environmental planning. We agree it would be beneficial for the Regional Council to act as a clearinghouse in sorting and distributing environmental information. We believe the second role identified, supporting regional agreement on the meaning of data and science could support the development of regional environmental plans. Much environmental analysis appears to focus on "minimizing" or "improving" an environmental condition without discussing how the existing or changed condition relates to the "capacity of the resource to sustain itself and remain productive." The overall objective should be described in terms of a level of ecosystem function – a desired condition. This is a difficult but critical discussion. Any progress that can be made to support this would be very useful.

Purpose and Need

S-002-003 | We agree with the objectives for having a strengthened environmental policy framework stated on page 1.4. We recommend adding an additional objective that supports efforts to decrease greenhouse gas emissions and buffer/respond to their associated effects on the environment.

Range of Alternatives

S-002-004 | Comments provided by EPA on developing an environmental framework should be very helpful for strengthening PSRC's environmental framework effort.

S-002-005 | Preferred Alternative

The DEIS has taken a significant step towards understanding the environmental tradeoffs between different growth scenarios. The "conversation" working towards the selected alternative(s) will rightfully be a long one involving a large number of stakeholders, and a large number of considerations. It will be important to plan for a feedback loop and opportunities to make adjustments, as information is developed. For example, the information in the DEIS can be used to further adjust and improve the alternatives, as well as define a preferred alternative(s). Furthermore, we support a solution that plans for the selected alternative(s) to be able to adjust to local conditions.

S-002-006 | Criteria for Evaluating Growth Distribution Alternatives

In *Chapter 3, Part D, Criteria for Evaluating Growth Distribution Alternatives*, ecological connectivity, including hydrologic, aquatic resource, and terrestrial habitat connectivity, should be included in the criteria.

S-002-002

Comments noted regarding your support for a larger environmental planning function at PSRC, and for a "sustainability" approach, which is now addressed in VISION 2040.

S-002-003

Thank you for your comment in support of the objectives for providing an environmental framework for the VISION. The Final EIS includes more detailed discussion of greenhouse gas and climate change issues, and the multicounty planning policies include greenhouse gas reduction objectives.

S-002-004

Comment noted.

S-002-005

Concur. The process to develop the PGA did involve the amount of time and stakeholders suggested in your comment. It also involved continuous public outreach, analysis, and three formal comment periods. Lastly, the PGA provides regional guidance that will adjust to local conditions, as implemented through local plans.

S-002-006

The Regional Council investigated some of the suggestions for additional measures in the FEIS, and the requested additions were determined by the Board to be either not sensitive to growth distribution, more appropriate for monitoring or for analysis at the comprehensive plan stage, or redundant to current measures. However, VISION 2040 includes policies and provisions that address system approaches, habitat connections, water quality, and ecological functions.

Affected Environment, Environmental Consequences

S-002-007 **Induced travel and induced growth.** In *Section 5.3 Transportation*, it would be helpful to convey whether or not there will be any opportunity to consider how the various alternatives and mitigation measures might induce travel and/or induce growth. If there is a quantitative or qualitative difference between choices, it would be useful to have that information while the alternatives and mitigation are being considered.

S-002-008 **Water supply availability.** *Section 5.7 Public Services and Utilities*, does not appear to have discussed water supply availability. As mentioned earlier, it is important to consider the impacts in the context of the capacity of the resource to sustain itself and remain productive. The discussion about the relationship between the availability and increased demand for the water supply will determine whether or not we can be sustainable. Can this be estimated? Or is this an unresolved issue, an area of uncertainty? It should be evaluated sufficiently in order to inform the decisions that will be made and to understand the ramifications of any choices that might be foreclosed associated with Vision 2020 Update. For any remaining uncertainty or unresolved aspects, how and when would they be resolved?

S-002-009 **Energy availability.** *Section 5.10 Energy*, does not appear to have quantified the availability of any of the energy sources or the increased demand that would occur during the Vision 2020 Update time frame. For example natural gas availability and increased demand is not quantified or compared against each other. We are concerned that there might be an assumption that there will be sufficient natural gas to meet the demand. As we mentioned earlier, it is important to consider the impacts in the context of the capacity of the resource to sustain itself and remain productive. The discussion about the relationship between the availability and increased demand will determine whether or not we can be sustainable. Can this be estimated? Or is this an unresolved issue, an area of uncertainty? It should be evaluated sufficiently in order to inform the decisions that will be made and to understand the ramifications of any choices that might be foreclosed associated with Vision 2020 Update. For any remaining uncertainty or unresolved aspects, how and when would they be resolved?

S-002-010 Another important consideration in the discussion about energy is to consider the efficiency of the energy modes described in Section 5.10. Understanding the efficiency can inform the discussion about conservation opportunities and conservation effectiveness for energy modes and for comparing energy modes.

As part of anticipating energy needs, we believe it is useful to consider that energy consumption can be significantly reduced as a result of integrated design as part of green (sustainable) building. Please also see our comments below under *Low impact development and sustainable building*.

S-002-007

The alternatives, by addressing all population and employment growth and their associated travel impacts, are inherently cumulative and address this issue.

S-002-008

The issues of water supply are discussed in section 5.6, and the discussion identifies the concerns regarding sustainability. Additional discussion of limitations of water supply on jurisdictions within the region has been added in section 5.7. Since the Vision 2040 document is focused on establishing a Regional Growth Strategy that sets forth broad patterns of growth and the underlying goals and policies, the alternatives it considers are conceptual. The analysis of water supply relied instead on the more detailed planning of member jurisdictions and subregional water supply planning organizations to describe the currently identified limitations, and to identify the likely issues that may be encountered by jurisdictions within the region as they plan for future growth.

S-002-009

Thank you for your comment. Section 5.10 (Energy) provides estimates of when petroleum supplies are thought to run out from both optimistic and pessimistic points of view. Natural gas estimations are not provided; however, it is reasonable to assume that predictions for natural gas are similar to predictions for petroleum. Issues of uncertainty will be more appropriately addressed through the more detailed planning conducted at the local plan level and by utilities.

S-002-010

Thank you for your comment. The multicounty planning policies and the Final EIS mitigation measures address green (sustainable) building practices. The FEIS has been updated to address the issues of energy efficiency more fully.

S-002-011	<p>Impacts discussion overall. Above are two discussions on water supply and energy. It is possible that the concerns identified in those discussions, about understanding the demands on the resource in context with its availability and capacity to sustain itself, may also apply to other resource discussions in the DEIS.</p>
S-002-012	<p>Earth and Seismic Hazard Areas. <i>Section 5.13.1 Earth</i>, discusses Seismic Hazard Areas and shares information about the February 2001, Nisqually earthquake. We have attached some information from the US Geological Survey (USGS) that appears to conflict with the information in the DEIS. The USGS information indicates the source of the earthquake is in the Deep/Benioff Zone while the DEIS indicates the source of the earthquake was Shallow Crustal.</p> <p>Mitigation</p>
S-002-013	<p>Ecosystems. <i>Section 5.5.4, Ecosystems</i> identifies a number of potential mitigation measures. Although these are all very valuable, some measures appear to be missing, such as ecological connectivity. The mitigation might be more complete and predictable if it is managed as part of an intentional overarching process for mitigation. It is not clear if the DEIS discusses the value of developing a watershed or regional environmental plan as a key step for identifying and implementing mitigation. If yes, we believe that would be a good approach. If not, we recommend that you consider this approach. A regional plan could assist to identify various mitigation (avoidance, minimization, replacement, etc.) approaches and integrate the most appropriate and effective measures into a holistic environmental plan for a particular area. It would also help to link mitigation to a resource's capacity to sustain itself and remain productive in a watershed or region.</p>
S-002-014	<p>Low impact development and sustainable building. We are encouraged with the progress made in promoting and implementing low impact development techniques, green building construction, landscaping with native plants, and so forth. We urge that PSRC have strong Multicounty Planning Policies that help these development techniques become common practice.</p> <p>Sustainable, or green building, can dramatically reduce the amount of materials used in building and waste from the construction and demolition. Green buildings are more durable, lasting longer and also reducing waste caused by demolition and consumption of new resources. Integrated design is part of sustainable building and that addresses energy – drastically reducing the amount of energy needed to operate and maintain the building over time.</p> <p>Monitoring</p>
S-002-015	<p>The updated VISION has the potential to impact many elements of the environment. Predicting the severity of these impacts and the effectiveness of mitigation measures is an imprecise science. We recommend the VISION/Planning Policies include a monitoring program designed to assess both impacts from the program and the effectiveness of measures used to mitigate such impacts. The EIS should describe such a</p>

S-002-011

Comment noted. PSRC has provided additional discussion regarding sustainability issues in the Final EIS through a wider array of topic areas. The VISION 2040 document, which includes goals and policies for implementing the Regional Growth Strategy, also provides additional measures focusing on sustainability in an array of areas.

S-002-012

The FEIS notes that the Seattle Fault, not the source of the Nisqually earthquake, is a shallow crustal zone. The reference to the Deep/Benioff Zone has been added to the FEIS.

S-002-013

This approach has been added to the discussion of potential mitigation measures.

S-002-014

Sustainable development practices are identified as mitigation measures in Section 5.2 of the Final EIS, and had previously also been noted in other sections including water resources and ecosystems. Also, the multicounty planning policies address the issues of low-impact development, sustainable design, and green buildings.

S-002-015

VISION 2040 has addressed this issue and contains a monitoring program.

S-002-015 | monitoring program and how it would be used as an effective feedback mechanism for the proposed VISION.

Multicounty Planning Policies

S-002-016 | **Measurable objectives, page 7.4.** It appears that the planning policies will include measurable objectives, where possible. It will be important for the environmental objectives and measures to be tied to functional outcomes or performance measures. For example, although it is important to choose options that have fewer environmental impacts, it will also be critical to know if the options would be achieving a functional objective, such as, "the capacity of the resource to sustain itself and remain productive." Although all the needed science to determine and measure this example objective may not be available, there has been progress towards understanding how to measure a "productive and sustainable resource." The science for measuring this objective will develop further but the stated performance measure or objective could be identified now.

S-002-017 | **Best available science.** Chapter 2 states that "multicounty planning policies could establish a procedure to incorporate 'adaptive management' principles into regional planning and decision-making efforts." We believe this would be an important aspect to incorporate into multi-county planning policies. We look forward to discussions about how this might best be accomplished.

Future Planning and Decision-making.

S-002-018 | The measures used to evaluate the alternatives on pages 3.10-3.12, seem to be a useful list of subject areas: environment, health, economy, land use, transportation, infrastructure, and environmental justice. There could be significant benefit if the information developed in this EIS could be used and supplemented at later stages of program and project development. A short discussion in the DEIS about the potential use of these criteria for future decisions would be useful, including a description of how these subject areas and environmental measures would be carried forward and evaluated further at future decision stages.

S-002-019 | The TPEAC One-Stop Subcommittee developed a draft template for capturing the important issues of an early planning document to help facilitate carrying forward key information into later SEPA planning and project documents. It is attached and might be useful as you think about how your environmental document can be used and supplemented for your transportation plan and for local planning.

S-002-020 | In a related but different note, the DEIS summary does not appear to discuss the significant areas of controversy and uncertainty, and the issues to be resolved. SEPA requires these to be included in These are required by SEPA. It may be that the whole document covers this issue or that the supplemental DEIS will cover this. Providing a discussion in the DEIS about the uncertainties would help to strengthen adaptive management planning. Identifying the issues to be resolved could help to organize and commit to discussions for future decision-making stages.

S-002-016

VISION 2040 measures relate to the policies and goals, creating the approach suggested in your comment. VISION 2040 also addresses the issues of sustainability and adaptive management.

S-002-017

See response above to S-002-016.

S-002-018

The criteria are intended to be used for the VISION 2040 process, but are available for other processes as well if others deem them valuable and appropriate. Currently, there are no specific plans to continue to use these evaluation criteria.

S-002-019

Thank you for the background information on TPEAC.

S-002-020

Those requirements are discussed more specifically under a specific section of the Executive Summary, both in the SDEIS and in the Final EIS. However, the DEIS did include discussions of uncertainty in the Purpose and Need and the Definition of Alternatives, and many of the other DEIS sections also noted the uncertainty about how alternatives would be implemented through the actions of others, and uncertainty about the geographic location of specific developments and impacts.

Table I-1 - Probabilities for Earthquakes from Various Sources

Earthquake Source and Example Events	Estimated Probability of Occurrence in 50 Years	Approximate Recurrence Interval
Deep / Benioff Zone <i>Nisqually 2001, M6.8</i> <i>Seattle-Tacoma 1965, M6.5</i> <i>Olympia 1949, M6.8</i>	84 Percent	35 - 50 Years
Cascadia Subduction Zone <i>January 1700, M9 (est.)</i>	10 - 14 Percent	500 - 600 Years
Shallow Crustal / Puget Basin <i>Random M6.5 or greater</i> <i>Seattle Fault M6.5 or greater</i>	15 Percent 5 Percent	333 Years 1,000 Years

Source: US Geological Survey, October 2003

**Appendix 6 – Review and Document Available Existing
Information Templates**

(planning and environmental analysis) – Template

Title, Author, Date of the plan or analysis [Click here and type title, author, date of plan or analysis]
Purpose of the plan or analysis [Click here and type purpose of the plan]
Relevant key decisions to the project or areas of concern [Click here and type relevant key decisions/areas of concern]
Elements of the environment considered for decision making [Click here and type elements of the environment considered]
The tools, methods and data sources used for analysis and decision-making. This should also include an assessment of their quality and limitations. [Click here and type tool, methods, data sources used/quality and limitations]
A summary of the public process associated with the decisions. This summary would include how the public was engaged in the process and how the public comments were factored into the decision-making. [Click here and type summary of public process]
The range of alternatives evaluated and any alternative(s) eliminated and why (this could also include a discussion of the impacts (environmental, social, economic) avoided or minimized as a result of the alternative eliminated). [Click here and type alternatives analysis]
The outcome and decision of the plan or analysis. [Click here and type outcomes/decision of plan/analysis]
Any remaining issues/decisions (environmental, social, economic, design) that were not addressed, not fully addressed or are unresolved areas of concern. [Click here and type outstanding issues]
Where copies of the plans or analysis can be obtained. [Click here and type where find more information]

Review and Document Available Information (studies) - Template

Title, Author, Date of the study [Click here and type title, author, date of study]
Purpose of the study [Click here and type purpose of the study]
Elements of the environment considered [Click here and type elements of the environment considered]
The tools, methods, models and data sources used for analysis. This should also include an assessment of their quality and limitations. [Click here and type tool, methods, data sources used/quality and limitations]
The outcomes and conclusions of the study. [Click here and type outcomes/conclusions of the study]
Any remaining issues/decisions (environmental, social, economic, design) that were not addressed, not fully addressed or are unresolved areas of concern. [Click here and type outstanding issues]
Where copies of the study can be obtained. [Click here and type where find more information]

Review and Document Available Information (planning and environmental analysis) - Example

<p>Title, Author, Date of the plan or analysis Transportation Element of the City of _____ Comprehensive Plan, City of _____, 8-14-2000 (adoption date)</p>
<p>Purpose of the plan or analysis The Transportation Element is a requirement of the Growth Management Act. In addition, it assists the City in coordinating transportation planning with land use planning and adequately serving existing and future residential and employment growth.</p>
<p>Relevant key decisions to the project or areas of concern The comprehensive plan assumes the following projects will be completed by 2010:</p> <ul style="list-style-type: none"> • HOV lanes completed on I-_____ from I-_____ to _____ Blvd • HOV lanes or intersection queue jump at several intersections with I-_____ <p>Traffic volumes on the freeway system forecasted to increase dramatically by 2010. (Included volumes, comparison to other areas and importance of adequate infrastructure for economic vitality of City)</p> <p>Revised LOS policy to emphasize the movement of people. Based on three premises: 1) Level of Service in _____ is primarily controlled by regional demand that must be solved by regional policies, 2) It's neither economically nor environmentally sound to try to accommodate all desired single occupancy vehicle (SOV) travel and 3) the decision-makers for the region must provide alternatives to SOV travel. The new LOS is based on travel time contours and are based on commute trip reduction measures. This LOS standard is a planning tool as opposed to the traditional engineer design LOS.</p> <p>Non-motorized and TDM measures will serve as credit toward meeting multi-modal goals of _____ and the region.</p>
<p>Elements of the environment considered for decision making The transportation element is a 'chapter' of the entire comprehensive plan. Within the comprehensive plan the following elements of the environment were considered: surface water, rivers and streams, wetlands, flood plains, stormwater, ground water resources, fisheries and wildlife resources, process, atmospheric conditions, steep slopes, landslides and erosion hazards, seismic areas, and coal mine hazard.</p> <p>The following elements of the environment considered that directly relate to transportation include: air quality (CO, ozone, particulates) and water quality.</p>
<p>The tools, methods and data sources used for analysis and decision-making. This should also include an assessment of their quality and limitations. Inventory of the various facilities within the City.</p> <p>Traffic Analysis (1994) included: land use modifications resulting during adoption of the Interim Land Use Element, 1993 Arterial, HOV, and transit plans, 1993 _____ mode split assumptions, and refinement of the Renton transportation model.</p>

Travel Demand – analyzed by compiling the estimated number of daily trips made within _____ and between _____ and 13 other general areas within the region. Traffic patterns were illustrated by selecting key road segments and estimating the proportion of traffic on each that is traveling to/from the areas defined for the travel demand analysis.

Traffic Patterns – assessed by estimating the origins and destinations of daily traffic on the major arterials and freeways entering _____.

Arterial Level of Service – daily traffic volume per travel lane was computed for each arterial segment.

Intersection Level of Service – the p.m. peak hour entering volume per approach lane was computed for each intersection.

A summary of the public process associated with the decisions. This summary would include how the public was engaged in the process and how the public comments were factored into the decision-making.
(example not available at time of publication).

The range of alternatives evaluated and any alternative(s) eliminated and why (this could also include a discussion of the impacts (environmental, social, economic) avoided or minimized as a result of the alternative eliminated).
(example not available at time of publication)

The outcome and decision of the plan or analysis.

The I-_____ corridor is a state facility therefore not subject to the concurrency requirements of the adjacent jurisdiction. However, many of the facilities the City is responsible for are affected by how I-_____ is operating. The _____ plan has a significant focus on the development of additional HOV lanes throughout its community, increased transit and the development of a LOS based on travel time as opposed to traffic volumes. The _____ LOS travel time strategy adds the time it takes various modes (SOV, HOV and transit) to travel 30 minutes from the city center in various directions (including I-_____). Less weight is given to SOV and credit is given to non-motorized transportation and transit.

The plan also acknowledges the importance of the transportation problems in _____ cannot be solely fixed by _____. I-405 is a regional facility with regional impacts and solutions.

What does this mean for WSDOT and its I-405 project? (This might be another good heading. It could provide the connect on any commitments made at the planning process that could impact the WSDOT project.) The City of _____ does not wish to accommodate the regional traffic (pass thru traffic) on its local streets, the City of _____ is committed to an increase in transit and HOV lanes, the City of _____ is not going to develop transportation facilities that accommodate the SOV as a faster alternative to transit or HOV.

<p>Any remaining issues/decisions (environmental, social, economic, design) that were not addressed not fully addressed or are unresolved areas of concern.</p> <p>The Travel Demand information was generated using 1990 information. The plan acknowledges the age of the information and that the plan will be updated with the 2000 information when it is made available</p> <p>The exact design of I-405 and any discussion of the future of the roadway specifically were not addressed in this plan. The roadway is a state highway and an important regional highway</p> <p>Where copies of the plans or analysis can be obtained.</p> <p>City of _____</p>
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State of Washington
DEPARTMENT OF FISH AND WILDLIFE
Mailing Address: 16018 Mill Creek Boulevard Mill Creek, WA 98012
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July 24, 2006

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

SUBJECT: Comment on Draft Environmental Impact Statement for VISION 2020 Update

Dear Dr. Abbott:

Thank you for the opportunity to review and comment on the above-mentioned document. We offer the following comments and suggestions in an effort to help you draft language that sufficiently protects our valuable fish and wildlife resources in Washington State.

S-003-001

The Washington Department of Fish and Wildlife commends the Puget Sound Regional Council for its efforts to develop a long-range plan that will identify strategies for accommodating anticipated high population growth in the central Puget Sound region. It is the hope of WDFW that the outcome of this process will help protect and maintain the viability of fish and wildlife species and their associated habitats within the area of concern. This is of utmost importance because of the increasing number of fish and wildlife species classified as state-listed species. Presently, there are 142 Washington state fish and wildlife species that are classified as endangered, threatened, sensitive, or candidates for listing.

S-003-002

Upon reviewing the four regional growth alternatives (including the No Action Alternative), WDFW recommends that the Metropolitan Cities be selected as the Preferred Alternative. Although some unavoidable impacts would occur on fish and wildlife resources, it would have the least negative impact compared to the other three alternatives. Growth in rural and unincorporated areas would be the slowest under the Metropolitan Cities scenario, thereby preserving a greater proportion of undeveloped land in areas containing important fish and wildlife species. A nationwide study conducted by the U.S. Department of Agriculture estimates 70,000 acres of private, undeveloped land throughout Washington State is annually converted to urban, industrial and other human uses. This conversion either eliminates or seriously degrades the lands' use for fish and wildlife habitat

S-003-001

Thank you for your statement supporting the ecological emphasis of the DEIS and the overall VISION 2040 planning program. Please see the Final EIS for additional discussion of the mitigation measures, and see VISION 2040 multicounty planning policies.

S-003-002

Your support for the Metropolitan Cities alternative is noted. The Preferred Growth Alternative is a hybrid of the focused growth alternatives contained in the DEIS, and shares many of the attributes of Metropolitan Cities.

Dr. Abbott
July 24, 2006
Page 2 of 4

S-003-003

Information contained in the Land Use section in the VISION 2020 Draft Environmental Impact Statement (page 5.2.7. Rural Land) states that 85 percent of parcels in the Puget Sound region are less than 5 acres in size. Poor planning could lead to more habitat fragmentation and significantly alter terrestrial migration corridors. Habitat fragmentation due to land use change has long been recognized as a major threat to the preservation of biodiversity and to the viability of endangered species. Conservation strategies have focused not only on the retention of adequate habitat areas, but also the spatial distribution of these areas throughout the landscape. Because some wildlife species have large territorial ranges, population growth in certain areas will need to be greatly curtailed in order to ensure that uninterrupted travel corridors remain intact for wildlife movement.

The importance of this issue is exemplified by looking at the number of dangerous wildlife complaints received in the WDFW Mill Creek regional office. The number of telephone calls complaining about bears roaming in neighborhoods in King County alone over doubled, from 110 calls in 2003 to 231 in 2004. This is not only costly to the agency, requiring time and staff to investigate, but is also stressful for homeowners as well. These situations may also require drastic measures, such as killing the animal if it comes back into a neighborhood after being relocated, which in recent years has been occurring at an increasingly alarming rate.

In order to improve technical assistance to local governments, WDFW is working on creating a model called the Local Habitat Assessment. The purpose of the model is to map current habitat conditions at the countywide and watershed scale using a Geographic Information Systems (GIS) platform. This will hopefully help identify appropriate urban growth boundaries that will best protect the most important fish and wildlife resources, guide acquisition or easement programs, and identify opportunities for habitat connectivity, thereby avoiding or reducing potential dangerous human/wildlife encounters.

S-003-004

As mentioned above, there will be unavoidable impacts to urban areas under the Metropolitan Cities Alternative. Because growth in these areas will be significantly increased, the effects of stormwater runoff into urban creeks, an issue that is currently of considerable concern to WDFW, will be greatly exacerbated. The seriousness of this issue is highlighted in a large, multi-year project conducted by Nat Scholz and others researchers at the Northwest Fisheries Science Center, NOAA Fisheries. Urban streams were sampled to examine pre-spawn mortality rates (PSM) for adult coho salmon. Sampling conducted from 2002 through 2005 in Longfellow Creek in Seattle found that 66% to 89% of adult coho salmon died before spawning occurred. By comparison, the rate of die-offs in non-urban (e.g., forested) drainages appears to be low. The precise cause of PSM is not known. However, at present, the weight of evidence suggests that the widespread coho die-offs are a consequence of non-point source water pollution. Preliminary sampling conducted in other streams has shown similar trends.

S-003-003

Thank you for the information on WDFW programs. As described in your comment, the Local Habitat Assessment sounds like it will be an important and useful planning tool. The Final EIS includes additional discussion of fragmentation and the potential problems associated with human/wildlife encounters.

S-003-004

Many of the urban streams (such as Longfellow Creek in the example provided) may already be contaminated, and relative increases in urbanization in these areas may not substantially exacerbate the problem, particularly if redevelopment improves existing stormwater systems. Alternatives with a less compact pattern of growth could have the potential of affecting a larger number of streams because more land would be developed. Nonetheless, VISION 2040 calls for accommodating all growth in an environmentally responsive manner, and includes policies addressing low-impact development, water quality, and more.

Dr. Abbott
July 24, 2006
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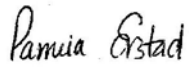
S-003-004

Because of this, it will be important that urban planning is designed in such a manner that will avoid increases in stormwater runoff and filter out dangerous pollutants that are toxic to fish and wildlife. For example, locating new multi-family residential structures within walking distance of various services, such as retail businesses and employment centers, would reduce the need for motorized vehicles and the amount of oil and gasoline runoff into streams. Feasibility studies should be required on all new development and redevelopment to determine the extent of incorporating Low Impact Development (LID) designs. Incorporating the LID designs into projects can make a significant difference in total stormwater runoff. A project in Seattle (Street Edge Alternative) resulted in a reduced total volume of stormwater within its two-block, 2.3-acre area by 97% for two consecutive years.

It will also be important to keep growth away from waterbodies such as creeks, streams, wetlands, and Puget Sound. Over time, cities should make an effort to purchase properties or transfer development rights so that these areas remain or are converted to open green space. Vegetated buffers are vitally important not only for the health of aquatic species, but for wildlife species as well. Approximately 85% of Washington's terrestrial vertebrate species use riparian habitat for essential life activities.

The Washington Department of Fish and Wildlife wishes to thank you again for the opportunity to provide comments on the Draft Environmental Impact Statement for the VISION 2020 Update. We sincerely hope that you will find these comments constructive in your final deliberations. Please don't hesitate to contact me at the number listed below with any questions that you have regarding the comments and recommendations contained in this letter. I would be more than happy to sit down with you and discuss some of the above-mentioned issues in greater detail.

Sincerely,



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Cc: David Brock, WDFW Region 4 Office
Bob Everitt, WDFW Region 4 Office

Dr. Abbott
July 24, 2006
Page 4 of 4

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July 31, 2006

Norman Abbot
State Environmental Policy Act (SEPA) Responsible Official
The Puget Sound Regional Council
1011 Western Avenue
Suite #500
Seattle, WA 98104-1035

Dear Mr. Abbott:

S-004-001

The Washington State Department of Transportation (WSDOT) Urban Planning Office has reviewed the VISION 2020 Update Draft Environmental Impact Statement and respectfully submits its comments for review and consideration by the PSRC. This letter begins with comments on the general approach used in the DEIS and follows with comments on specific elements.

The draft Vision 2020 Update EIS contains much interesting data, the graphics are useful, and the document is well organized. However, basing the analysis on alternatives that allocate growth according to city size results in significant conceptual problems. These problems make it difficult for the document to address the overarching question, "*what is the preferred way to accommodate the large amount of expected population and employment growth while maintaining our quality of life?*" There are several reasons this is so:

S-004-002

- 1) **The DEIS describes where growth might occur but does not describe the policy choices available to respond to that growth.** Basing the analysis on alternatives that allocate population and employment according to city size only tells us *where* growth might happen. It does not answer the equally pertinent question of *how the growth can be accommodated while maintaining our quality of life*. The policy options for responding to growth fall into three broad categories:
 - Expansion of infrastructure
 - Increased regulation of land use and development
 - Pricing of public goods and services, especially transportation

S-004-001

Comment noted.

S-004-002

In seeking to address the question of "how growth can be accommodated," VISION 2040 policies address many of the issues raised in your comment, calling for infrastructure and pricing. Further, the Washington State Growth Management Act is based on a "bottom-up" premise that does provide local governments significant discretion on where growth is accommodated.

S-004-002

State and local governments have the ability to use each of these tools in varying degrees. In contrast, local jurisdictions and state agencies have very little ability to directly allocate growth among cities or between cities and unincorporated areas. The DEIS would be more useful if it compared the policy options that are available for addressing growth rather than focusing exclusively on distributions of population that are largely outside local or regional control.

S-004-003

- 2) **It is not apparent the alternatives represent realistic or achievable outcomes.** The DEIS does not describe how the region could bring about the dramatic changes needed to achieve the distribution of population and employment indicated in the alternatives. As the PSRC is well aware, the existing pattern of development is the result of both policies and market forces. While it is possible to develop policies that *allow* development, it is much more difficult to adopt policies that *cause* specific levels of development to occur. For instance, what set of regional policies would cause employment in Bellevue and Bremerton to both grow by over 61% as projected in the Metropolitan Cities alternative? The geographic circumstances of these two cities are very different, as can be seen in growth trends of the last thirty years that show employment in Bellevue more than quintupled while growth in Bremerton was very modest. It may be there are fundamental reasons that favor Bellevue over Bremerton in attracting employment. If that is so, then it is important the alternatives defined for comparison in the DEIS incorporate those factors. Similarly inexplicable growth patterns can be found in the other alternatives such as those excerpted in the table below:

VISION 2020 Appendix D-4 Employment

City	Base	Large Cities Alt.	Small Cities Alt.
Everett	79,552	105,809	92,680
Monroe	7,595	12,279	35,703
Woodinville	15,105	55,373	21,816

What regional policies would cause employment in Everett to grow by only 16% while at the same time causing employment in Monroe to grow by more than 300% as indicated in the Small Cities alternative? It is true Monroe starts from a much lower base, but even in absolute terms it would add more than twice the number of workers as Everett, despite Everett's advantageous location and large supply of developable land. The different growth rates of Woodinville and Monroe are equally difficult to reconcile. In the Large Cities alternative employment in Woodinville explodes by more than 40,000 while just up the road

S-004-003

These comments imply a level of analysis that would be more appropriate for a local plan, and misunderstand the purpose of the VISION. 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. Further, the alternatives in the DEIS included conceptual "bookends" for analysis purposes, and are based on a planning framework—regional geographies—not local jurisdictions and their plans, and is meant to serve as regional guidance regarding a VISION, not a detailed plan. Further, cities are assigned to regional geographies based on size alone, and it is through subsequent local planning actions that implementation issues are resolved.

S-004-003

employment growth in Monroe shrivels to only 4,684 workers, about one ninth Woodinville's growth, and only a small fraction of the increase shown in the Small Cities alternative.

If it is assumed market forces continue to have any influence on the level of economic activity and where businesses locate, then the alternatives used for comparison in the DEIS do not appear to represent realistic outcomes. Since SEPA rules require "reasonable alternatives" and the WAC defines these as actions that could feasibly attain or approximate a proposal's objectives, it is incumbent upon PSRC to define alternatives that *are* feasible and *do* achieve regional objectives.

S-004-004

- 3) **There may be a disconnect between the DEIS purpose and the analytical framework.** The purpose of comparing alternatives is to identify the costs, benefits and impacts from alternate courses of action. This is reflected in the purpose and need statement on pages ES.2-3 which states, "Keep the VISION current, relevant and useful to decision makers and the public." That is certainly a commendable purpose, but the very similar results shown for the four action alternatives provides a slim basis for comparing or setting regional policies. As can be seen in Appendix D, key indicators such as the number of trips and SOV mode share change very little among the alternatives. Are differences of only one or two percent statistically significant in a thirty year forecast? Are we to conclude from these results there are no feasible choices that would enable the region to better accommodate expected growth? Or do the results suggest that alternatives allocating growth based on city size do not isolate the available policy choices and resultant impacts? If it is the latter, then perhaps PSRC should consider re-framing the alternatives in terms that better reflect the purpose of the DEIS and the range of feasible policy choices. It may be more productive to approach the issues raised in the DEIS on a subregional basis rather than through alternatives based on city size.

S-004-005

- 4) **The significance of centers in the performance of the Alternatives:** There is reference to "centers" in each of the alternatives presented. It would be useful for PSRC to provide a more in depth review and analysis on the success of current "centers" and their progress in meeting growth targets. If the current "centers" have not met their expected targets then the region might want to reconsider this policy before assigning this designation to other areas.

S-004-004

See previous comment regarding the purpose, unit of analysis, and level of analysis of the VISION update. Also, the FEIS has been updated to more fully discuss the effect the existing base of population and employment has on performance results.

S-004-005

For more information on centers, see the VISION 2040 Issue Paper on Centers.

S-004-006

Specific Comments on the Transportation Section (5.3.1)

The transportation section describes the existing system in terms of the facilities and services that are in place. That is a good start, but it does not tell us much about how the transportation investments made since 2000 are influencing system performance. This is important both for the purposes of understanding what progress has been made since 2001 (as alluded to in the DEIS introduction) and for identifying the investments and strategies that are most effective in addressing impacts from growth.

Other Transportation Section Comments:

S-004-007

Pages 5.3.3 and 5.3.4 – The maps need to be updated to reflect HOV system projects that have been completed since 2001. This information can be obtained from the WSDOT website or by contacting Leah Bolotin (206 464-1264.)

Page 5.3.5 – The Freeway HOV system will total approximately 310 lane miles when complete.

Page 5.3.6 – The text indicates that planned transit investments in Destination 2030 include a 40% increase in total transit service by year 2010. However, data provided to WSDOT by transit agencies shows only a 17% increase in service hours between 2000 and 2010. What is the basis for the 40% increase shown in the DEIS? If transit service hours are an input to the model it may be necessary to revisit the mode share results shown in Appendix D-5 and elsewhere in the document.

Page 5.3.7 - It would also be useful to know whether the region is on track to increase 2010 Park & Ride capacity by 18,360 stalls (a 75% increase).

S-004-008

Page 5.3.8 - The brief description of the regional freight and goods system is fine as far as it goes, but nowhere in the document is there analysis describing the relationship between efficient freight movement and economic growth, nor have freight performance indicators been included that could be used to evaluate the alternatives. The VISION 2020 + 20 Issue paper on Transportation briefly discusses freight issues and identifies relevant plans, but it does not discuss connections between freight system investments and regional development patterns.

Additional information on the future role of freight rail service will soon be forthcoming from the Transportation Commission's Statewide Rail Capacity Study. It may be useful to describe the scope of that effort in the VISION 2020 DEIS. The discussion of regional airports and freight movements on page 5.3.8 should be expanded to reflect the results of the Puget Sound Air Cargo Study and Strategy that was recently completed.

S-004-006

Comment noted. The EIS process is addressing the effects of long-range projections for population and employment growth. While the region has made recent improvements to some elements of the transportation system since the base year 2000, they represent a relatively small portion of the regional system, and the FEIS's depiction of the broader trends and conditions remains accurate. The region is continuing to experience growth in travel demand and in congestion.

S-004-007

VISION 2040 used the adopted metropolitan transportation plan, Destination 2030, as the transportation network for the purpose of analyzing the alternatives. At the time of the adoption of VISION 2040, the PSRC is in the process of updating the Destination 2030 to bring it into alignment with the VISION. Destination 2030 provides an additional opportunity to address these issues.

S-004-008

The issue of freight performance was not identified as a key indicator in the process by the Board to develop evaluation criteria. Freight is an important component of the transportation system, and will be analyzed in greater detail during the Destination 2030 update.

S-004-008 | by the PSRC. We understand that the PSRC MTP major update will incorporate these study results but the discussion in the transportation chapter would benefit from acknowledgement of this study and its results, which suggest that future air cargo growth in the region can generally be accommodated at SeaTac International Airport and King County – Boeing Field, subject to those two airports master plan developments and on-going market trends in the air cargo industry.

S-004-009 | Page 5.3.9 - This discussion of inter-city passenger rail might be expanded to include some consideration of the mutual benefit of some of these investments (e.g. benefits to freight and passenger rail).

S-004-010 | Page 5.3.10 – The section describing transportation demand management should be updated. It would be helpful for policy makers if TDM could be presented in a way that showed how it can increase the efficiency of infrastructure improvements such as the HOV system, and what role TDM can play for each of the alternatives.

Specific Comments on the Environmental Effects and Mitigation Section (5.0.3)

S-004-011 | Page 5.0.3 – The somewhat obscure paragraphs on this page raise a number of questions. A more detailed description of how population and employment was allocated is needed to clarify the degree to which modeled outcomes are the result of choices made in assigning growth within established urban growth areas. The text states that “Once again, different representations of these alternatives based on on-the-ground development patterns are possible.” How different?

The last paragraph on page 5.0.3 mentions that “this variability of possible land use distributions within the alternatives... does have the potential to affect output data produced by the analysis tools used in later subchapters of Chapter 5 and Chapter 6. In particular the Regional Travel Demand Model used for transportation performance analysis may be quite sensitive to the local distribution of population and employment.” This raises the question, how much did population and employment assignment decisions influenced performance of the transportation system? Since the performance differences between the alternatives are very small, it is especially important to clearly describe how much of the differences are attributable to subjective choices made in defining the alternatives. Would different but still possible assignments change the rank order of the modeled outcomes for the key performance indicators?

S-004-009

Additional mention has been made in the Final EIS regarding the scale of the analysis in VISION as compared to what will be conducted for transportation in the Destination 2030 update; this would address freight and passenger rail investments.

S-004-010

See previous responses regarding the issue of the base year and Destination 2030 investments used in the VISION update. Also, note that VISION 2040 policies and narrative have been developed that discuss the issue of TDM and CTR.

S-004-011

The Final EIS includes revisions and clarifications to the alternatives and the planning process, largely in response to public comments on the Draft EIS and Board direction. This includes changing the level of definition for all alternatives to be at a regional geography level of detail, rather than by individual jurisdiction. Most of this additional information is provided in Chapters 3 and 4, which provide background for the alternatives. While it is correct that the alternatives' depictions for the regional distribution and concentration of growth in population and employment do influence the data outputs, including the transportation demand model forecasts, the broad patterns of growth assumed in the alternatives are distinct enough that it is unlikely that substantial changes in results would occur from small variations within an alternative's definition.

S-004-012 **Specific Comments on the Evaluation Criteria (Appendix C)**

The inclusion of evaluation criteria is important for comparing alternatives in an objective fashion. In some instances it is not obvious that the criteria in Appendix C of the DEIS reflects the desired outcomes as established in the four overarching goals set forth on page C.1 and touched upon elsewhere in the DEIS. For instance:

- There does not appear to be a strong connection between the economic measures listed on page C.4 and actual economic performance. Measures that would help show how the regional economy is performing could include; growth in income per household relative to the national average, gross regional product per capita or average income per capita, net regional private sector investment, average duration of unemployment, percentage of commercial loans that are non-performing, rate of business formation relative to peer regions, etc.
- The transportation criteria could be augmented with more direct measures of performance such as; peak period capacity utilization for highways and transit, percentage of regional arterials operating at level of service D or worse in peak hours, public transportation cost per rider compared with the national average, etc.

S-004-013 **Comments on the Transportation Issue Paper**

Page 41 of the Transportation Issue Paper (PSRC, January 12, 2006) refers to the RCW requirement for Least Cost Planning in the section on Transportation Finance. Since policies that guide regional development patterns would be considered a least cost approach, shouldn't the DEIS describe the relationship between the RCW least cost planning requirement and the alternatives defined in the DEIS? Or, more specifically, how will the PSRC's application of least cost planning enable a preferred alternative to achieve regional objectives at lower cost? If least cost planning is used to help develop future plans, wouldn't it also fit as a tool in the section on Building Future Visions?

Page C-1 of the Transportation Issue Paper outlines recommendations for advancing concurrency in regional planning efforts. Though it is true that setting LOS standards for concurrency is largely a local decision, the points listed in the Issue Paper identify some of the ways concurrency is important regionally. Since concurrency is tied to land use and development shouldn't the text of the DEIS describe the impacts on attainment of concurrency standards that could be expected from each of the alternatives?

S-004-012

The Regional Council investigated some of the suggestions for additional measures, and the requested additions were determined by the Board to be either not sensitive to growth distribution, more appropriate for monitoring or for analysis at the comprehensive plan stage, or redundant to current measures.

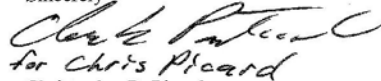
S-004-013

The least-cost planning issue is to be addressed in the Destination 2030 update. Given the regional scale of the alternatives, and the large variation of conditions among localized areas, localized impacts of growth could vary. As such, local concurrency standards would not be an appropriate measure for analysis.

Mr. Norman Abbot
July 31, 2006
Page 7

Thank you for the opportunity to comment and provide input on the PSRC's Destination 2020 Update DEIS. The issues under consideration in the DEIS and across the region are of vital interest to WSDOT. We look forward to the release of the Supplemental DEIS and will be most interested the results of the DEIS alternatives selection effort.

Sincerely

A handwritten signature in cursive script, appearing to read "Chris Picard".

Christopher R. Picard
Manager, WSDOT Urban Planning Office
206 464-1278

CC: Brian Smith: Director – Strategic Planning and Programming
Lorena Eng: Regional Administrator, Northwest Region
Randy Hain: Regional Administrator, Olympic Region
Bob Jones: Planning Manager, Olympic Region
Craig Stone: Deputy Director, Urban Corridors Office
Barb Ivanov: Director, Freight Policy Office
Judy Giniger, Director Public Transportation and rail Office



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

July 31, 2006

Reply to
Attn Of: ETPA-088

Ref: 06-041-MPO

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

RECEIVED
AUG 03 2006

Dear Mr. Abbott:

PUGET SOUND REGIONAL COUNCIL

The U.S. Environmental Protection Agency (EPA) has reviewed the Puget Sound Regional Council (PSRC) VISION 2020 Update Draft Environmental Impact Statement (DEIS). We welcome the opportunity to provide comment because we view this as an important time for early engagement with respect to our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Also, in accord with our participation on the Ad Hoc Environmental Advisory Group for the VISION 2020 Update, we hope to offer helpful perspective.

F-001-001 EPA commends PSRC for its leadership in developing the VISION 2020 update within an environmental framework. This is a major step forward in our collective efforts to integrate land use planning, transportation planning, and environmental planning/review. We hope that the comments offered here will help to strengthen that framework as the VISION is refined.

F-001-002 Our detailed comments (enclosed) describe a methodology for developing the preferred alternative. We suggest a "Green Infrastructure" or "Eco-logical" approach, in which the lands most in need of protection for sustaining ecosystem functions and biodiversity are identified and avoided. We believe this would provide a more structured environmental framework for land use and transportation planning. We also emphasize that the preferred alternative needs to substantively address greenhouse gas emissions. Other comments address PSRC's role in regional environmental planning, environmental measures, mitigation, monitoring, water supplies, induced travel and growth, and the multi-county planning policies.

Thank you for the opportunity to offer comment. If you have questions or would like to discuss these comments, please contact Elaine Somers of my staff at (206) 553-2966.

Sincerely,

Christine B. Reichgott, Manager
NEPA Review Unit

Enclosure

F-001-001

Thank you.

F-001-002

VISION 2040 addresses these issues, with policies and narrative related to sustainability, green building, and low-impact development.

U.S. EPA Detailed Comments
VISION 2020 Update
Draft Environmental Impact Statement

F-001-003 Regional environmental planning

The DEIS identifies some possible roles for the Regional Council in future environmental planning. We agree it would be beneficial for the Regional Council to act as a clearinghouse in sorting and distributing environmental information. We believe the second role identified, supporting regional agreement on the meaning of data and science could support the development of regional environmental plans. Much environmental analysis appears to focus on “minimizing” or “improving” an environmental condition without discussing how the existing or changed condition relates to the “capacity of the resource to sustain itself and remain productive.” The overall objective should be described in terms of a level of ecosystem function – a desired condition. This is a difficult but critical discussion. Any progress that can be made to support this would be very useful.

F-001-004 Purpose and need

We agree with the objectives for having a strengthened environmental policy framework stated on page 1.4. We recommend adding an additional objective that supports efforts to decrease greenhouse gas emissions and buffer/respond to their associated effects on the environment.

F-001-005 Range of alternatives

The Growth Management Policy Board directs the PSRC to use an environmental framework to develop the updated VISION (p. 3.14). The DEIS provides good baseline environmental information that sets the stage for doing this. The range of alternatives presented concentrate growth in centers to varying degrees, and we agree that this needs to occur. However, the range of alternatives presented have not been developed within an environmental framework that helps planners and communities to determine more specifically where and how growth should and should not occur. We recommend that the preferred alternative, which is expected to be a hybrid of the alternatives presented, be developed within such an environmental framework, which we describe below.

Developing an environmental framework. To develop an environmental framework, we recommend that the preferred alternative be constructed using a “*Green Infrastructure*” approach. This approach goes by many other names, such as *Linking Planning and NEPA*; *Ecological*; *Integrated Planning*; and *Context Sensitive Solutions*. The procedure for all of these approaches is essentially the same: first define the areas that need to be protected and/or restored, then select a growth scenario that is “custom fit” to avoid these areas. The end result should support continued natural ecosystem function and maintenance of biological diversity. For detailed methodologies on this subject, we refer you to the following:

F-001-003

Thank you for your comment identifying the value that PSRC could play in helping to advance the prominence of environmental issues in regional decisionmaking. VISION 2040 includes an environmental framework and multicounty planning policies to help continue to raise the level of information available about environmental issues, and to reinforce the importance of coordinated planning to minimize the region's environmental footprint.

F-001-004

Thank you for your comment in support of the objectives for providing an environmental framework for the VISION. The framework has been revised to more fully include greenhouse gas emissions and climate change. Also, the multicounty planning policies include additional environmental policies that include greenhouse gas reduction objectives.

F-001-005

Thank you for your comment regarding a green framework for the Preferred Alternative. The Final EIS and the VISION 2040 Plan describe in more detail how the Preferred Alternative will be implemented with supporting policies that provide a green framework for how growth should occur. While the Preferred Alternative describes a preferred pattern for growth, decisions about where growth will be focused within a given jurisdiction will still remain a local decision, but would be guided by the multicounty planning policies, countywide planning policies, and other applicable regulations.

- *Green Infrastructure: Linking Landscapes and Communities*. Dr. Mark A. Benedict and Edward T. McMahon, Island Press, 2006.
- *Eco-Logical: An Ecosystem Approach to Developing Infrastructure Projects*. U.S. Dept. of Transportation, Research and Innovative Technology Administration, April 2006. Obtain from the National Technical Information Service, Springfield, Virginia 22161.

Using these approaches, the “Actions to Improve Ecosystem Conditions” listed on page 2.22 of the DEIS, would first include (but not be limited to):

- a. protecting intact habitats,
- b. preserving corridors; and
- c. protecting/restoring ecological connectivity by linking habitats and hydrological features where appropriate.

The environmental framework produced by these steps would provide the basis for developing a preferred land use alternative with respect to determining *where* development should occur. The second major step, which addresses *how* development should occur, would be to implement the remaining land use actions on page 2.22 in order to restore, improve, and protect sensitive ecological systems within the human occupied areas of the region (urban, suburban, and rural lands).

Recommended environmental plans and information sources for establishing the environmental framework, would be:

- Washington Department of Fish and Wildlife (WDFW) Ecoregional Conservation Plans, which identify the most important wildlife habitat areas for maintaining biological diversity;
- Puget Sound Action Plan;
- Salmon recovery plans;
- Existing watershed protection/restoration plans;
- State and Federal species recovery plans;
- Washington State GAP analyses;
- Natural Heritage Program data;
- WDFW Priority Habitats and Species data; and others.

Please note that we expect EPA FY 05-07 Puget Sound Estuary Program Enhancement Grants for Watershed Protection and Restoration will soon be offered for the purpose of integrating various plans into one cohesive action agenda.

Developing a preferred alternative. Once the environmental framework or “Green Infrastructure” is identified, we recommend that the preferred alternative and its associated transportation system be “custom fit” to the region and to individual communities in a manner that addresses two main needs: the need to both regionally and locally maintain and restore

F-001-005 natural ecosystem structure, function, and biodiversity; and the need to reduce greenhouse gas emissions.

“Green Infrastructure” would also help buffer greenhouse gas emissions due to combustion of fossil fuels as noted p. 5.4.7. To control further emissions, it is essential to examine the transportation system in concert with land use. The transportation analysis (Figure 5-3-3, p. 5.3.13) indicates that the Metropolitan and Large Cities alternatives are fairly comparable with respect to vehicle hours and miles traveled and hours of delay. The Extended Growth Target and Small Cities alternatives result in substantially higher travel demand and substantially increased air pollution and greenhouse gas emissions. They also perform poorly with respect to preventing sprawl and protecting remaining habitat and open space.

F-001-006 We agree that concentrating growth and development in centers is essential to protecting as much natural environment as possible. When doing so, however, it is important to emphasize growth in the centers that can best accommodate more growth without degrading their supporting natural ecosystems. For example, in a community that is dependent upon ground water for drinking water supplies, it would be counter-productive to place impervious surface over the aquifer recharge areas or to allow development that severs these essential ecosystem connections in other ways.

F-001-007 We understand that King County is making more detailed recommendations with respect to addressing greenhouse gas emissions, and the need to buffer or lessen the impacts of these emissions. We encourage PSRC to adopt a VISION that thoroughly considers their proposals. We expect that fashioning a relevant and responsive updated VISION will require thinking about land use and transportation systems concurrently within the environmental framework, and a willingness to go beyond “what is” to think creatively about “what could be.”

F-001-008 **Criteria for evaluating growth distribution alternatives**

Environmental measures, p. 3-10 – We recommend adding a criterion that assesses the extent to which ecological connectivity is protected or restored. Suggested measures that would help to characterize this could be:

- Extent to which WDFW’s Resource Conservation Plans are incorporated into the land use and transportation plans;
- Corridors and habitat linkages protected, set aside, or created;
- Area/patch size of intact, undeveloped wildlife habitat avoided or set aside;
- Extent to which an alternative would further fragment remaining habitats;
- Miles of undeveloped or restored shoreline and riparian area;
- Area and percent of impervious surface within watersheds;
- Area and percent of developed land designed with Low Impact Development;
- Ground water recharge areas protected vs. rendered impermeable.

We agree with the other measures listed, including carbon dioxide emissions under air quality.

F-001-006

Centers remain a key component of the Preferred Growth Alternative. VISION 2040 calls for accommodating growth in urban, rural, and natural resource areas in an environmentally sensitive manner.

F-001-007

Concur.

F-001-008

The Regional Council investigated some of the suggestions for additional measures in the DEIS, and the requested additions were determined by the Board to be either not sensitive to growth distribution, more appropriate for monitoring or for analysis at the comprehensive plan stage, or redundant to current measures. However, VISION 2040 includes policies and provisions that address system approaches, habitat connections, water quality, and ecological functions.

F-001-009 | **Measures used to evaluate the alternatives, pages 3.10 – 3.12.** The measures seem to be a useful list of subject areas: environment, health, economy, land use, transportation, infrastructure, and environmental justice. There could be significant benefit if the information developed in this EIS could be used and supplemented at later stages of program and project development. A short discussion about the potential use of these criteria for future decisions would be useful, including a description of how these subject areas and environmental measures would be carried forward and evaluated further at future decision stages.

Affected environment, environmental consequences

F-001-010 | **Water supplies.** The DEIS appropriately discusses regional drinking water supplies and forecasted needs. It is not clear, though, whether or not the water utility demand and supply forecasts consider the potential effects of future climate trends on regional hydrological patterns and resulting water supplies. We recommend that these potential effects be examined. Growth impacts should also be examined with respect to source water protection areas, preventing pollution and excessive drawdown of ground water supplies, and the ability to implement effective well head protection.

For those communities that are heavily dependent upon groundwater supplies, the comparison of alternatives should evaluate the extent to which impervious surfaces are diminishing aquifer recharge capabilities. At a minimum, we recommend that the Supplemental EIS for the preferred alternative include this information. If possible, we suggest that growth impacts both with and without low impact development techniques for new development and re-development could be estimated and compared to assess the impacts to drinking water supplies and to communities that are dependent upon ground water wells. This analysis should also note where there is evidence of decreasing aquifer levels, such as well test data, diminished stream base flows, dry streambeds, and so on.

F-001-011 | **Induced travel and induced growth.** It would be helpful to convey whether or not there will be any opportunity to consider how the various alternatives and mitigation measures might induce travel and/or induce growth. If there is a quantitative or qualitative difference between choices, it would be useful to have that information while the alternatives and mitigation are being considered.

Mitigation

F-001-012 | **Ecosystems: Potential Mitigation Measures, 5.5.4, page 5.5.17.** To maintain species and ecosystem functions, transportation facility design and construction must go beyond “salmon-friendly design.” As stated earlier in the DEIS, ecological connectivity needs to be maintained and restored. This means that facilities should be designed and constructed to maintain hydrological connectivity (ground water, surface water, aquatic habitats) and also provide for terrestrial habitat connectivity. Where habitat fragmentation occurs, wildlife crossings, bridges that span upland as well as aquatic areas, fencing, and other design features should be included.

F-001-009

The criteria were developed solely for the purpose of developing a Preferred Growth alternative. It is not anticipated that they will be used in future decisions at this time.

F-001-010

The effects of impervious surfaces are discussed in a qualitative manner. However, a detailed analysis by area is not needed given the general patterns of development examined in the FEIS, which are allocated at a level higher than individual water supply districts. The FEIS quantitatively identifies the likely range of impacts that the region and its jurisdictions may face, depending on how growth is accommodated, and also includes additional studies such as those that EPA recommends as potential mitigation measures. The uncertainty related to climate change was previously discussed in the Draft EIS under cumulative effects, but it is also now noted in the more detailed discussion of water supply impacts.

F-001-011

The alternatives, by addressing all growth, are by their definition cumulative.

F-001-012

The Final EIS now includes a discussion of the ecosystem mitigation measures you suggest.

F-001-013 | **Low impact development.** We are encouraged with the progress made in promoting and implementing low impact development techniques, green building construction, landscaping with native plants, and so forth. We urge that PSRC have strong Multi-county Planning Policies that help these development techniques become common practice.

F-001-014 | **Monitoring**

The updated VISION has the potential to impact many elements of the environment. Predicting the severity of these impacts and the effectiveness of mitigation measures is an imprecise science. We recommend the VISION/Planning Policies include a monitoring program designed to assess both impacts from the program and the effectiveness of measures used to mitigate such impacts. The EIS should describe such a monitoring program and how it would be used as an effective feedback mechanism for the proposed VISION.

Multi-county planning policies

F-001-015 | **Measurable objectives, page 7.4.** It appears that the planning policies will include measurable objectives, where possible. It will be important for the environmental objectives and measures to be tied to functional outcomes or performance measures. For example, although it is important to choose options that have fewer environmental impacts, it will also be critical to know if the options would be achieving a functional objective, such as, "the capacity of the resource to sustain itself and remain productive." Although all the needed science to determine and measure this example objective may not be available, there has been progress towards understanding how to measure a productive and sustainable resource. The science for measuring this objective will develop further but the stated performance measure or objective could be identified now.

F-001-016 | **Best available science.** Chapter 2 states that "multi-county planning policies could establish a procedure to incorporate 'adaptive management' principles into regional planning and decision-making efforts." We believe this would be an important aspect to incorporate into multi-county planning policies. We look forward to discussions about how this might best be accomplished.

F-001-013

VISION 2040 MPPs address this issue.

F-001-014

VISION 2040 has addressed this issue and contains a monitoring program.

F-001-015

VISION 2040 contains monitoring measures. Additional measures will be considered, with a PSRC commitment to form a stakeholder group to review all proposed new measures.

F-001-016

Thank you for your support in the development of multicounty planning policies advocating the use of best available science and adaptable management in growth management decisionmaking. VISION 2040 speaks to the importance of these issues.

From: EISUserComment@psrceis.org
To: <commentadmin@psrceis.org>
Date: Fri, Jul 28, 2006 10:21 AM
Subject: EIS Registered User Comment

The following EIS Browser comment was submitted by:

John Brown
brownjohn@netscape.net

This comment had no uploaded file associated with it.

COMMENT DETAILS:

Author: John Brown
Source: <http://www.psrceis.org/docs.php?ogid=1000000047&addDocument=1>

Subject: Vision 2020 Comment

Comment:

I read the Executive Summary for the Vision 2020 ongoing study. Here is my outlook on the growth.

I-001-001 | I live in Lynnwood, and I know that growth will continue under all of the plans reviewed. I am against the increase in multi-family housing at the expense (loss) of single family housing or other public open-space. I find that I spend a good portion of my days within my own city, neighborhood, and house. I derive much of living experience close to home. To me, this means that I don't "escape" on weekends or weeknights to enjoy a tree, a singing bird, or the general landscape. So while I appreciate that the Smaller Cities Alternative may lead to more overall "destruction" of wilderness, I am in favor of the Smaller Cities Alternative.

I-001-002 | If employment increases enough in the expanded areas, perhaps people may find it possible to live near where they work and not have to live in a large metropolitan area.

I-001-003 | Access to public transportation is a problem. It's a problem for me to even find decent bus service between Lynnwood and Redmond.

Thanks for taking the time to read my comment.
links

I-001-001

Comment noted regarding your preferences among the alternatives.

I-001-002

Thank you for your comment in favor of improved jobs and housing balance in communities throughout the region. While all of the alternatives would provide this to varying degrees, it is important to recognize that while some households may benefit from having employment sites nearby, increased employment outside of regional growth centers would tend to create a more dispersed growth pattern.

I-001-003

Thank you for your observation. PSRC agrees that more effective transit service for people throughout the region will need to be provided as the region continues to grow. The multicounty planning policies include several elements that support improved transit. More specific detail on transportation services will be addressed in the Destination 2030 update.

From: "Dick Burkhardt" <dickburkhardt@comcast.net>
To: <vision2020update@psrc.org>
Date: Mon, Jul 31, 2006 4:35 PM
Subject: Comments on the Vision 2020 Update DEIS

Comments on the Vision 2020 Update DEIS

I-002-001 There is an old saying in computation - "garbage-in, garbage-out". The point is that the global economy is in the early phases of a paradigm shift that renders invalid the PSRC straight line projections for population growth, employment growth, etc. This paradigm shift is the "end of cheap energy", with oil leading the way.

The new economy will put far more resources into making more efficient use of declining stocks of fossil fuels, to minimizing their environmental damage, and to developing more sustainable alternatives. However none of the presently known alternatives seem capable of matching fossil fuels for ease of acquisition, transportation, processing, and usage on a scale to maintain, let alone expand, the current economy. Possible exceptions are long-shot technologies like nuclear fusion, but most scientists are not sanguine about these prospects.

In fact a number of resource experts now forecast the onset of global economic decline within a generation. This would be true even with accelerated investment in renewables, nuclear, natural gas, and coal, since independent experts expect world oil production to begin declining within a few years and historically nothing else has been able to match its large-scale return on investment. Coal stocks could hold up the global economy at a reduced level for a few more decades but the impact on the environment (global warming, air pollution) would be draconian unless huge investments are made toward carbon sequestration. Natural gas would be better, but natural gas is already peaking in North America and is expected to peak globally within a couple of decades, with the cost of shipment being a major factor. Uranium supplies will limit a nuclear come back in addition to construction and disposal costs.

The DEIS section on Energy (5.10) should be revised to reflect these prospects. Then other sections should be revised to reflect the possible consequences. A fundamental consequence is a huge increase in uncertainty as to future economic and population trends. On the one hand Washington State is well endowed with sustainable energy (hydro, wind) and a moderate climate, giving it a substantial economic advantage over many other areas. On the other hand, it is quite dependent on the global economy. So a number of scenarios are possible. But whatever scenario in regard to overall population and employment, the trend away from automobile dependency will accelerate as the price of gas doubles again and again. Some will be able to switch to plug-in hybrids, but for many the much higher cost of these new vehicles will be too much, as dramatically higher fuel prices ripple through the global economy, especially with the accelerated loss of well-paying jobs that will accompany this ripple.

I-002-001

Thank you for your comment. Section 5.10 (Energy) addresses the fact that market pressures may persuade the region to conserve energy in a more aggressive manner. Solar, wind, geothermal, and biomass were also provided as viable energy alternatives being explored by energy providers throughout the region. These, combined with conservation, have the potential to help the region minimize potential impacts.

I-002-002

Therefore a major consequence of this paradigm shift will be a switch from "congestion" to "price" as the primary limiter of automobile travel. "Latent demand" will fade into history as people demand more carpools and transit, also much shorter trips with increased walking and cycling. More crowded housing will become a necessity, with increasing losses of value for much housing that is far from activity centers and a corresponding rise in the "suburban poor". Rather than "choosing" one of 4 "growth scenarios", it will be more important to attempt to model a number of possible future scenarios and to develop ways to adapt to these as they unfold.

Dick Burkhardt, Ph.D.

4802 S. Othello St.

Seattle, WA 98118-3851

206-721-5672 (home) 206-851-0027 (cell)

dickburkhardt@comcast.net

I-002-002

Congestion and pricing are important elements of the Destination 2030 update. Note that the Destination 2030 network was held as a constant in the VISION 2040 update and so these issues were not appropriate to address. The Destination 2030 update provides an opportunity to raise these issues.

From: Michele Leslie
To: Robin McClelland
Date: 7/24/2006 9:00:12 AM
Subject: Fwd: VISION 2020 Update Comment

From the website.

>>> <FormProcessing@psrc.org> 7/23/2006 12:00 PM >>>
Hello!
This is results of submitted form by 67.150.218.251.

Submitter Email : FormProcessing@psrc.org

Fields:
02.contactname = Dennis Clark
04.address = 4310 Dayton Ave. N. #203
05.city = Seattle
06.state = WA
07.zippostalcode = 98103
11.emailaddress = dennisbclark@hotmail.com
12.comments = I recommend adopting the Metropolitan Cities alternative as the "preferred alternative."

I-003-001

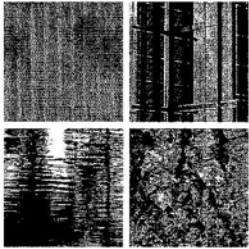
I believe this alternative will provide the best combination of environmental protection, especially in terms of conservation of rural lands and aquatic ecosystems, and human quality of life in our cities. This alternative also most increases the attractiveness of mass transit, which lessens dependence on the automobile.

Thank you for the opportunity to comment.
13.Send = Submit
mailto = mleslie@psrc.org
mailto =
subject = VISION 2020 Update Comment

I-003-001

Thank you for stating your preference for a regional growth alternative.

15



VISION 2020 Update Draft Environmental Impact Statement

Comment Form

What's your vision for the future of the central Puget Sound region? We want your input and need to hear from you!

The public comment period ends on Monday, July 31, 2006.

The public is encouraged to provide thoughts, ideas, and concerns on the Draft Environmental Impact Statement to help select a preferred growth alternative. Comments should 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 vision2020update@psrc.org.
- By attending any of PSRC's board or committee meetings. 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 develop a preferred alternative. 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/datapubs/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.

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YOUR INPUT IS NEEDED

The region has some tough choices to make to get from four broad alternatives to a single vision that reflects our shared values and aspirations. Participants in the review process are asked to comment on the growth alternative that appears to best meet the needs of the region. You are welcome to mix and match portions of the alternatives that have been included in the Draft Environmental Impact Statement to form a hybrid that represents an alternative you prefer.

PLEASE CONSIDER COMMENTING ON THE FOLLOWING SUBJECT AREAS:

1. The environmental baseline (see Chapter 2)
2. The growth distribution alternatives — including ideas for a Preferred Growth Alternative (see Chapter 4)
4. Environmental justice (see Chapter 6)
3. Discussion of multicounty planning policies (see Chapter 7)

COMMENTS:

I-004-001

Focus on Small independent Businesses is
far more important than support for
and resources into large corporations or
chain / Box stores.

Focus on a sustainable Environment and
Future for the Next Generation(s) is
also Paramount.

Focus on Building Communities should
Take Precedence over Random Development
and Growth for the sake of Growth —

PLEASE ADDRESS COMMENTS TO:

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



I-004-001

VISION 2040 has addressed these issues, and contains policies supporting small, local, and new businesses; policies and narrative related to sustainability; and a Regional Growth Strategy that calls for focusing growth.

DON GEREND
425-765-6567

Should Growth Pay for Growth?

I-005-001

Higher

Summary: The Prosperity Partnership has goals of increasing employment in Puget Sound. PSRC projects an increase in jobs of some 1.1 million and an increase in population of some 1.6 million by 2040. The infrastructure needs for this growth are tremendous, and transportation needs alone, just to accommodate this growth at present regional level of service (excluding existing replacement and maintenance needs), might amount to \$10 billion or more. Should this be paid for by growth, or does the burden rest on the checkbooks of all of us? Precedent is being considered in the case of regional connection charges to cover expansions of sewer treatment facilities.

Back of the Envelope Considerations: If we assume that the transit/roads needs to accommodate an additional 1.6 million people will cost \$10 billion, what would that amount to in terms of a Regional Impact Fee per housing unit? If we estimate 1.6 million people translates into 625,000 housing units, the impact fee per new housing unit would be about \$16,000.

Current discussions are centered around Sound Transit 2 generating over \$8 billion by year 2025 and RTID proposing over \$13 billion with most coming from 30 years of bonded taxes.

Outlying suburbs have to deal with the local impact of growth, above and beyond the regional burden. In one case (Sammamish) there are estimates that the local transportation impact of growing to current build-out zoning would cost about \$50,000 per new dwelling unit. If 50% is charged as impact fees upon construction, this would raise impact fees from the current high level of some \$7,000 per dwelling unit to the level of \$25,000 per unit. And that is funding at the 50% level, leaving the municipality with the burden of the remaining \$25,000 per unit.

If there were a regional impact fee generating \$10 billion added to the Sound Transit 2 funding of \$8 billion and the RTID needs of \$13 billion, and of this total \$7 billion were to be distributed directly back to the municipalities shouldering the growth, on a prorata basis, this would leave an additional \$3 billion to supplement ST 2 and RTID on regional projects while contributing some \$11,000 per dwelling unit back to the municipalities in which the growth is being accepted.

Sound Transit, RTID and the Prosperity Partnership should be cognizant of the impact that growth is having on the municipalities that are accepting the growth, above and beyond the mega projects that relieve some of the regional impact of growth. A regional impact fee, coupled with ST 2 and RTID distributing 1/3 of their funding directly back to the municipalities accepting the growth, would help to spread the cost of growth more equitably, with the growth itself paying a larger share of the cost.

For further discussion of this, please contact: Don Gerend, Sammamish City Council
425-392-1412; dgerend@ci.sammamish.wa.us 7-13-06

- City Council Signat?
- SCA?
- writer Signat?

I-005-001

Comments noted regarding the costs of growth. At the same time, there is considerable research showing that focused growth is a less costly pattern of growth to serve. For more information, see FEIS chapters and Cost of Sprawl Informational Paper. Note that VISION 2040 actions call for collaborative work at the regional level to seek to create additional resources for infrastructure.

TO: PUGET SOUND REGIONAL COUNCIL,
Norm Abbott, SEPA Responsible Official
FROM: Virginia Gunby, 2540 NE 90th St. Seattle, WA 98115
vgunby@aol.com
RE: COMMENTS ON THE VISION 2020 UPDATE

7/16/06

- I-006-001** 1. **My selection** of the 2040 Preferred Regional Growth Alternative is a combination or hybrid of the Metropolitan Cities and the Larger and Core Suburban Cities. This is primarily because the "Growth Targets Extended" and the "Smaller Cities" would result in increased sprawl, a busting of the urban growth boundaries and increased length of trips and dispersed land use into the rural areas, that would never be served effectively with transit. Projecting the very uncertain future, due to escalating costs of oil, housing, transportation, new health concerns and public awareness of the need to offset carbon emissions due to Climate Change, make this PSRC 2020 Update very difficult.
- I-006-002** 2. **The DEIS Environmental Baseline** This is a very well written history and reference about our region and the lessons learned from development trends between 1950 to 2000. It provides wise insight into the need to protect the region's environment for future generations. It also has a great inventory of the actions by the region and local governments in land use and the impact of implementing our growth management plans and transportation. I particularly appreciated Figure 2-15 on page 2.22, "Actions To Improve Ecosystem Conditions". This information should be given more publicity and be available to the regional population, not hidden within the lengthy DEIS. I support the DEIS's emphasis upon emphasizing wise regional and resource planning policies and programs and prioritizing best management practices to achieve quality regional outcomes.
- I-006-003** 3. **Environmental Justice**—There is a real opportunity to seek involvement by minority and lower income people in this regional update. I believe that the cost and location of housing the growing population in the region could be the focus of the discussion. Recent newspaper articles have focused on the difficulty of finding low cost homes or rentals in many parts of our urban region. This will impact the future transportation systems and increase costs for more infrastructure and individual mobility.
- I-006-004** 4. **Comments on Needing to Broaden the 2020 Update Public Process**—In spite of the Issue papers, Scoping Process, Public Opinion Polls, Surveys and Public Events, Regional View Newsletters, very few people know about the PSRC role in regional planning, or about this current **2020-2040 Update**. PSRC has not reached out into their information base, to those who are busy making a living and surviving everyday. First of all I strongly recommend that you get expert info and advice on how to get your message out more creatively to the four county region's minority and low income groups, business and civic groups, not just local elected officials who are members of the PSRC. When they were updating their plan a few years ago, the Portland Region used broader community resources, even providing update information on their proposed long range vision with **Free** distribution of educational CDs on their plan, and the process to give feedback, by mail, phone or e-mail. As a starter, invite TVW or another local public and the private TV stations and media to look at the region's future, or PSRC produce one they can use. Invite Neil Peirce, columnist and/or Bruce Katz from the Brookings Institute, who are familiar with the region, back to provide some independent perspectives on major issues facing the future of our region. More of the region's populace needs to be engaged in a real regional conversation on this Update. The work is significant and needs an audience!

I-006-001

Comment noted regarding your preferences among the alternatives.

I-006-002

Thank you for your comments. The VISION document will be widely distributed, and PSRC intends to make the environmental baseline available for other use beyond the FEIS.

I-006-003

The Board agreed with the comments to better address issues surrounding affordable housing. VISION 2040 includes provisions that encourage local jurisdictions to document their efforts to implement housing targets, and setting housing goals and then monitoring them. VISION better explains the true cost of housing based on location, land supply versus unit production in housing supply/demand, and a stronger housing monitoring effort that considers issues such as rents, presence of housing programs and/or organizations, and overall housing production.

I-006-004

The public outreach process for VISION 2040 is the most extensive PSRC has conducted in over a decade. It included extensive outreach to local jurisdictions and agencies, three formal public comment periods, three EIS documents, a draft and final VISION, as well as numerous other publications.

2. Comments on PSRC 2020 Update DEIS

I-006-005 Seattle Councilmember Steinbrueck asked, during the discussion on the 7/13/06 joint Committee's meeting what the **"Toolkit"** would be for implementing the adopted Update 2040 program. That needs to be more clear so that the local governments can use the valuable info gathered in the Plan level DEIS. The PSRC's role in providing high standards for planning and development could be strengthened through greater involvement in the sharing some of the "Baseline" in the DEIS with state's new Regional Transportation Commission. The region currently has a Governor appointed four- county Commission evaluating the future forms governance for planning and funding regional transportation, and I hope the addition of Land Use/Growth Management.

I-006-006 The PSRC is the most knowledgeable and professional organization, and the most likely existing regional candidate to assume more responsibility in regional transportation planning and funding decisions and regional growth management policies in the future. I believe that the PSRC can seek a stronger regional leadership role, or it may fade into regional history. In the past the PSRC has been technically competent, but politically weak, because of trying to please all of its members and constituencies. The result is that it has a reputation with many in the region of being weak on the implementation of the regional transportation planning policies and process and MPO review actions. (The failure to deal professionally and review forth-rightfully the Monorail debacle is one example of a long list of past opportunities that indicate the lack of regional courage on regional issues.)

I-006-007 Another issue not considered in the DEIS is the problem of the proposed state Initiative -933, the so-called *"property fairness"* state Initiative that most likely will have enough signatures to be on a statewide ballot in the fall of 2006. If passed, it would exempt future development from basic state and local land-use rules and regulations and make our region's future unlivable! If it became law, the Vision 2020 update and public agencies in our region, and all over the state would virtually be subject to the paying public funds, or more likely waiving current important local and state land use regulations. I-933 would, if passed by the state's voters, scrap all of the region's past and future work not only with the PSRC 2040 Update, but also with the next Multi-County Policy work and the future Destination 2030 update too.

Available resource, agricultural lands, "intact" environments and open spaces will really threatened, if tax-short local governments are required to pay to enforce restrictions that would preclude development for a detrimental use. Oregon State's Secretary of State has found that Measure 37, the similar type of legislation passed there last year will cost state and local governments \$344 million per year in administrative costs that do not even include paying the claims of any the property owners. Local city and county taxes are already significantly reduced by previous state Initiatives limiting the growth of their tax revenues. They will lose local control of their land use regulations, because they do not have the funds to compensate property owners, and are required to adopt balanced budgets. They would not be able to enforce their adopted regulations, or to retain them.

I listened to the 7/13/06 joint session of the PSRC Growth Management and the Transportation Committee members. No one verbalized what the regional version of 2040 could be under a worst case Growth Alternative, with the passage of I-933. PSRC should show its 2040 impacts in a Supplemental EIS.

I-006-005

VISION 2040 has addressed this issue, and the actions call for numerous "toolkit" documents as well as technical assistance and outreach to local governments.

I-006-006

Comment noted. Through its work on VISION 2040 and the subsequent Destination 2030 update that will follow the adoption of VISION 2040, PSRC is continuing to take a strong role in regional transportation planning. PSRC's role in regional transportation planning responds to both state and federal legislation, as discussed in Chapter 5 of the Final EIS.

I-006-007

Your suggestion is noted although the DEIS did not discuss I-933. As you are aware, 933 was not successful.

I-006-007	<p>3. Comments of the 2020 Update DEIS- V. Gunby</p> <p>I agree with the May 23, 2006 <i>Workshop Peer Panel</i> when they prioritized the need to protect and enhance our region's rural areas and natural resource lands, air and water as a legacy for future generations living here. Under 1-933, GMA, protection of fish and wildlife species and Washington Forest Practices Regulations would also have to be waived, or the public would have to compensate landowners for the value of private forest buffers along salmon streams, steep slopes, and to protect adopted Urban Growth Boundaries.</p>
I-006-008	<p><u>Other Concerns Related to our Region's Future</u></p> <p>1. Hopefully reviewers of the DEIS will provide more technical emphasis than I have on the impact of predicted Climate Changes upon our weather, water sources and electrical power, air quality and the changes in regional land uses, population movement to a milder climate, etc. In addition, public awareness of the use of Carbon Offset Credits needs more discussion in the DEIS.</p>
I-006-009	<p>2. Can PSRC by forecasting the future trends increase public and private awareness and practices to promote "regional sustainability" to improve our growth alternatives and related transportation plans and operations, and the growth of "green" public policies and other new relevant programs?</p>
I-006-010	<p>3. What happens, if our region, like San Diego, grows much faster than the PSRC's projections? How can we wisely manage increased growth, significantly greater PSRC's selected alternative?</p>
I-006-011	<p>4. Fortunately personal Health and Lifestyle issues have recently been related to our current auto-dependent land use in the region. What can the region specifically recommend to transition from the past policies of the separation of local land uses to multi-use development? Should the PSRC be given the power to review large area zoning changes/projects for their impacts on the region's development and transportation?</p>
I-006-012	<p>5. How do we protect and promote "affordable lifestyles" in the region through the 2020 Update and plan for the diversity of affordable future housing? Gentrification of the major centers and the lack of local agreement on the sharing a regional plan for replacement of low cost housing by the region's cities and counties is a major regional issue. The next Multi-County Planning process must finally face and prioritize work on this with the PSRC's oversight.</p>
I-006-013	<p>6. Finally, achieving and prioritizing a new, integrated multi-modal transportation planning with limited funds, will be more feasible if transport funding has voter oversight, review and approval through the 2007 regional vote. In the past there was the traditional guaranteed annual "silos" of capital funding, from earmarked sources, and not great public accountability. With PSRC's help and guidance, the egion can create a new way to integrate and prioritize the plans and the project money for regional and state transportation projects that are consistent with our Destination 2030 and GMA Policies. PSRC is challenged to provide the critical oversight and to be pro-active in its review of the proposed RTID and the Sound Transit's 2007 packages. These modal plans were prepared with little thought about the need to integrate and/or to be consistent with regional plans for rail and highway projects. PSRC has the great opportunity and the obligation, because of its regional MPO and RTPo role to provide the independent, regional and public review, and recommend revisions, to promote joint multi-modal planning and funding of the <u>first and largest package of an integrated regional transportation program of projects ever proposed in this region?</u></p>

I-006-008

The Final EIS has been updated to include additional discussion of greenhouse gas emissions and the effects of global warming in 5.4, Air Quality. This includes potential mitigation or minimization measures such as Carbon Offset Credits.

I-006-009

VISION 2040 addresses this issue, with sustainability being a central theme that is woven throughout the document.

I-006-010

VISION addresses this issue to more clearly state that we are planning for a certain amount of growth, not necessarily that it will occur in a given year.

I-006-011

VISION 2040 addresses these issues, with policies and the Regional Growth Strategy supporting mixed-use development and public health.

I-006-012

VISION 2040 promotes strategies to address housing affordability. VISION 2040 contains a stand-alone housing policy section, as well as housing-related actions. While they do not set affordable housing targets for local jurisdictions, they do speak to creating a regional housing action plan, which will likely address many of the issues raised in your comment. Also, affordable housing is addressed as an element of the Regional Growth Strategy.

I-006-013

The RTID package did not pass in the November 2007 election. Note that PSRC has begun the update of Destination 2030, and will be looking to extend it to 2040 and align it with the updated VISION.

June 6, 2006

From: Michele Leslie
To: Ben Bakkanta; Ivan Miller; Norman Abbott; Robin McClelland
Date: 6/8/2006 9:01:45 AM
Subject: Fwd: VISION 2020 Update Comment

From the PSRC Website.

>>> <FormProcessing@psrc.org> 6/7/2006 10:21 PM >>>

Hello!

This is results of submitted form by 4.242.18.59.

Submitter Email : FormProcessing@psrc.org

Fields:

02.contactname = Bill Horder

04.address = 2024 42nd Ave E

05.city = Seattle

06.state = WA

07.zippostalcode = 98112

11.emailaddress = biskante@earthlink.net

12.comments = The most liveable outcome would be one with a few dense cities surrounded by low density areas. I favor the Metropolitan Cities alternative, or, possibly, the Larger Cities alternative. The Smaller Cities alternative would create one huge area of sprawl, similar to Los Angeles.

13.Send = Submit

mailto = mleslie@psrc.org

subject = VISION 2020 Update Comment

I-007-001

Thank you for stating your opinion about the regional growth alternatives.

I-007-001

From: Michele Leslie
To: Robin McClelland
Date: 7/27/2006 4:11:00 PM
Subject: Fwd: VISION 2020 Update Comment

>>> <FormProcessing@psrc.org> 7/27/2006 3:19:13 PM >>>
Hello!
This is results of submitted form by 146.129.210.164.

Submitter Email : FormProcessing@psrc.org

Fields:

02.contactname = Erin MacDougall
04.address = 7015 Brooklyn Ave NE
05.city = Seattle
06.state = WA
07.zippostalcode = 98115

11.emailaddress = erin_macd@yahoo.com

I-008-001 12.comments = I think we need to go further than what is put forth here to make our region a liveable and health-focused sustainable place. In a world of climate change and where the federal government's practices set us back, I feel this region can significantly raise the bar for standards. The way we use land says a lot about how communities can remain cohesive. How do you sustain communities when all planning is significantly car-focused and health diminishing? The role of access to healthy, local food for example has been neglected in this Vision and needs to be included. If we are to truly vision, we need language and construct that people can understand (this executive summary is far from that) and a process that engages community members who are disproportionately impacted by car-centered environments. We can do better, I hope there is still room to vision for planning that promotes physical and emotional health of our residents in a variety of ways.

13.Send = Submit

mailing list =

mailto = mleslie@psrc.org

mailtype =

subject = VISION 2020 Update Comment

I-008-001

VISION 2040 addresses this issue, with sustainability being a central theme that is woven throughout the document, as well as presenting a stronger focus on the region's people. Also, the issue of public health is incorporated into the different policy sections, including the development patterns, environment, and transportation subsections.

From: "Dennis Neuzil" <dennisneuzil@foxinternet.com>
To: <vision2020update@psrc.org>
Date: Mon, Jul 31, 2006 12:22 AM
Subject: Comments of the Vision 2020 Regional Plan Update

I-009-001 Of the four growth distribution alternatives formulated and assessed in the DEIS I believe the "Metropolitan Cities Alt." and the "Larger Cities Alt." perform the best overall in terms of the environmental impact sectors evaluated -- upon which I placed considerable weighting upon Transportation impacts. Either of those two are my preferred alternative, and the single best is probably a hybrid of those two alternatives (with population and employment distribution growth intermediate to the distributions assigned to those two).

I-009-002 However, there is a larger issue which the DEIS and GMA fails to address: should we plan to accommodate 1.6 million more people and 1.1 million more jobs in our region over the next 35 years? Good planning is more than efficient accommodation of growth -- we should be looking at more than "accommodating" all comers". Good planning asks the question whether we should accommodate all of the trend/projected growth -- or something less. Good planning asks the question "Is the baseline growth of 1.6 million Pop./1.1 million jobs sustainable for our region? Will central Puget Sound be a better place with still more substantial development?"

I personally believe that we already gone past an optimum size in terms of sustainability and overall quality of our environment, although we have made some enhancements in spots in terms of smart growth as evidenced by housing additions to several of our cities' downtown areas. Accordingly, I believe the EIS should be revised to examine the impacts of a lesser level of future growth and compare them to the impacts stemming from the 1.6M pop/1.1 M jobs growth scenarios. And we need to revisit the GMA policy and legislation to ask if a metropolitan region should be able to endeavor to shape its own destiny in terms of the limiting the absolute amount of future growth and not merely manipulating the distribution of the trend-based growth projection.

Dennis Neuzil, Dr.Eng., P.E
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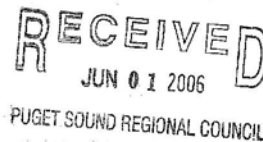
I-009-001

Thank you for identifying your preferences among the alternatives. As you note, the PGA is a hybrid-focused growth alternative.

I-009-002

PSRC did not study alternatives with less than the regional forecast. This is to make VISION 2040 more useful to local governments, who are required under the state's Growth Management Act to use the OFM forecast.

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206-262-1155
fax 262-1930
dfp@dfpNET.NET



May 30, 2006

SEPA Responsible Official
Puget Sound Regional Council
1101 Western Avenue, Suite 500
Seattle, WA 98104

Re:
Vision 2020+20 Update
Draft Environmental Impact Statement
Summary, Issue Paper on Transportation, Table Group Topics (5/23/06)
(collectively "The Documents")

I-010-001

This DEIS looks out 34 years (until 2040), envisioning various land use and transportation alternatives to meet projected growth in the region. In general these alternatives are characterized by greater or less concentration of development.

However, in common they all envision congestion becoming much worse: "On average, a trip that now takes 30 minutes during the afternoon peak period will increase to nearly 90 minutes in 2025", and presumably commensurately worse by 2040 (Issue Paper on Transportation ("Issue Paper"), pp 22-23). This despite the fact that "The current regional transportation plan, Destination 2030, has identified needed investments of over \$100 billion to preserve, maintain, operate and expand the region's transportation system." (Table Group Topics ("Topics"), p 5.3.1) So despite a rather gargantuan level of investment, congestion, and therefore mobility for most people, is projected to get much *much* worse. This scenario, common to all the alternatives, is likely to lead to taxpayer exhaustion and/or revolt.

Two questions present themselves. First, is it possible to mitigate the \$100 Billion transportation "tab" without diminishing regional mobility. And second, is it possible to reduce, as opposed to more than triple, mobility-robbing congestion? I believe the answer to both questions is 'yes', and I believe they involve the same basic mechanism, applied at two different levels of intensity, namely "congestion pricing" of the region's highways.

First. It is not clear how the \$100 Billion tab breaks down, nor what kind of dollars are involved (eg 2005 dollars? year of expenditure dollars?) nor what is included in the operation of the transportation system. Presumably \$100 Billion is a "back of the

I-010-001

VISION 2040 includes policies supporting pricing. This will be an important aspect of the update to Destination 2030, which began in January 2008. Note that the Destination 2030 network was held as a constant in the analysis of the growth alternatives.

I-010-001
I-010-002

envelope" figure as it would almost have to be considering the time period and uncertainties involved. Having said all this, it is clear that transit in general, Sound Transit in particular, and that agency's Link light rail system most in particular constitute a substantial portion of this tab. According to transportation researcher Jim MacIsaac, the capital costs (ie, excluding operations, depreciation and debt service) of the Link system build-out is approximately \$27 Billion in 2005 dollars (email communication, 5/17/06). Taking this figure as representative, it appears that Link constitutes about a quarter (\$27 of \$100 Billion, perhaps more if transit operations are added in) of the region's projected transportation spending.

So the question presents itself, is it possible to create equal or better transit mobility while mitigating this sum? In my view the answer clearly is 'yes' and it involves applying pricing to the region's projected 276 lane miles of freeway HOV lanes (Topics, p 5.3.5), turning them into so-called HOT lanes, and then running express buses (Bus Rapid Transit) on these lanes, in conjunction with BRT on arterial bus-only lanes. (HOT lanes are touched upon in, eg, Topics p 5.3.5) We know both from decades of academic work (in particular that of Nobel Prize winner William Vickery) as well as from several now-deployed systems (San Diego, Orange County, Houston, Minneapolis, etc.) that congestion-pricing is able to keep freeway lanes moving at whatever design speed is desired, via a variable toll, modified in real time, typically every few minutes. For these remarks I assume a HOT system with "vanpools or better" going free, and all others paying the "market clearing" price.

The length of the system would be $276 \text{ lane miles} \div 2 = 138 \text{ freeway miles}$. BRT would run from north of Everett to south of Tacoma to East of Issaquah, up and down all the regional freeways at 60 mph 24/7, creating transit mobility for the entire metro region. The HOV lane system is 2/3 complete and the final 1/3 is funded. Several direct-to-HOV ramps have been constructed and several more are funded. It is assumed that HOV to HOV (HOT to HOT) ramps at freeway intersections would not be constructed until such time as the interchanges were to be rebuilt in any event (eg when the freeways are widened). The cost of conversion from HOV to HOT would be covered by those willing to pay the price of a latte to make sure they "absolutely, positively" get to their appointments on time. Therefore the total public cost of this system is that of a handful of direct access ramps.* This system would preclude the need for the impending 125 mile Link light rail system, saving the great bulk of its \$27 Billion cost.

Thus by implementing BRT on freeway HOT lanes (supplemented by arterial bus-only lanes) the region would create transit mobility as good as, or better than, that of a 125 mile light rail system, while reaping an "avoided cost" of approximately \$27 Billion. This is similar to the "post-WPPSS" energy infrastructure situation in this region. By taking simple steps like wrapping water heaters, the region was able to reap benefits equal to the cost of multi-billion dollar nuclear reactors, while benefiting from the avoided cost of not building those power plants. In short, "A penny saved is a penny earned" (albeit in this case one might say "Twenty-some billion saved ...")

* See *Further Remarks* below re capacity of BRT vs LRT systems, and other issues.

I-010-002

The projects and strategies within the regional transportation plan or the Sound Transit plan are not the subject of this FEIS. See previous comment regarding the update to Destination 2030.

Second. The depressing conclusion that we face an inevitable future of much diminished mobility is stated several places in The Documents: "While it is possible to expand transportation capacity (both roadways and transit), it is doubtful that the region has the financial capacity, land supply, or public support to add enough capacity to return the region to service level of 20 years ago. Congestion, especially during the peak periods, could likely be a part of our future regardless of the growth alternative chosen." (Topics, p 5.3.1) If this is inevitable, then we must reconcile ourselves to a diminished future. But is it inevitable? In my opinion, 'no'. Using exactly the same principles as those outlined above, but extending them, it is possible to envision a future of enhanced, rather than diminished, mobility. This would come about by, in effect, making all freeway lanes in the metropolitan freeway network HOT, so that they all flow freely, even at the height of rush hours.

One rationale for such "HOT freeways" is touched upon in passing within The Documents. On page 24 of the Issue Paper is an illustration of the famous flow vs density graph. As more and more vehicles are added to a roadway, speed diminishes while through-put (vehicles per hour past a point) increases, until an inflection point is reached. Past this point both speed and flow decrease, and rapidly, until through-put is a half or less of the roadway maximum of approximately 2000 vph for a freeway lane. This is what is called in vernacular "gridlock" and what transportation engineers call "hypercongestion". One way of talking about what is going on is that the "traffic pipes" decrease during rush hours. Extending that analogy one might say that the region suffers the traffic equivalent of a twice daily *coronary thrombosis*. Perversely just when we need the pipes to be at their largest, they contract. Pricing to maintain flow ("congestion pricing") is the only known way to prevent such a *thrombosis*. One might observe that it is rather foolish to expend the huge sums necessary to build a freeway network only to get a half (or less) its capacity when it is needed most. None of the alternatives laid out in The Documents deal with this situation. Thus they all have us wasting at least half of our freeway capacity.

Let us envision, then, that all the freeways in the region, 34 years from today are HOT. And let's look at a representative freeway, I-405 and see what the dynamics of this are. There are three. The first dynamic is that supply equals demand, and the freeway flows at 60 mph 24/7. The second, as discussed above, is that the freeway is carrying its maximum flow or through-put at all times. The third, assuming that the net revenue from pricing is reinvested in capacity enhancements in the corridor, is that not only does supply equal demand statically (the first point above), but also dynamically. In other words the net revenue could be used to, for example, add additional lanes (or transit) in the corridor, thus increasing its capacity.

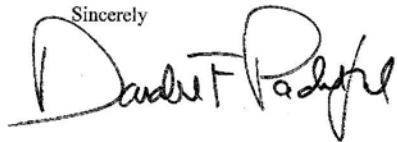
Obviously this is not something that could be achieved in the near future, but if the region is looking out 34 years, as it is in The Documents, it makes little sense not to examine the one mechanism that could both optimize mobility and save untold billions of scarce transportation dollars to boot. Surely within this time frame we can assume leaders who have the courage to implement best systems. London has established a form of pricing in

I-010-003

See previous response regarding pricing, VISION 2040, and Destination 2030.

- I-010-003** | its central city to the great benefit of its people. Hopefully and presumably we are capable of learning from others.
- Further Remarks**
- I-010-004** | 1) The above remarks do not speak to the form of metropolitan region that may come out of the Destination 2020+20 process. However, there can be no doubt that transit is most effective when it works with land use, producing so-called Transit Oriented Development. This would speak in favor of one of the more concentrated development alternatives.
- I-010-005** | 2) Within the 34 year time period one might hope that inter-city rail would directly serve the region's principle international airport, SeaTac, as is the common practice overseas.
- I-010-006** | 3) If general congestion pricing of the metro region's freeways were implemented as in the **Second** section above, then what are now HOV lanes, and would become HOT lanes, as in the **First** section, could become truck only lanes, increasing safety on the region's highways by segregating trucks from passenger vehicles.
- I-010-007** | 4) The region might want to consider moving part of its port facilities from the ports of Seattle and Tacoma to, eg, Grays Harbor, where ground congestion is less of a concern.
- I-010-008** | 5) The two unfunded sections of the regional HOV lane network are a) downtown Seattle to Northgate, and b) the SR520 bridge, which will include HOV lanes when rebuilt. These are both expensive projects.
- 6) A "philosophical" take on the above can be read at:
(<http://archives.seattletimes.nwsource.com/cgi-bin/texis.cgi/web/vortex/display?slug=tolls09&date=20020509&query=gardner+bundy+padelford>)
<http://archives.seattletimes.nwsource.com/cgi-bin/texis.cgi/web/vortex/display?slug=tolls09&date=20020509&query=gardner+bundy+padelford>
- 7) The system referred to in the **First** section above is fleshed out in the following OpEd:
http://seattletimes.nwsource.com/html/opinion/2002619155_sunpadelford13.html
which is slightly expanded upon, and supplemented with pictures and footnotes at:
<http://www.bettertransport.info/padelford/btrpugetsound.htm>
- 8) For a discussion of the capacity of BRT vs light rail see:
<http://www.bettertransport.info/padelford/DSEIS%20ST2%201204.htm>
particularly footnotes 17 and 18.

Sincerely



\\Vision2020+20DEIS

I-010-004

Comment noted regarding your preferences for elements of a Preferred Growth Alternative. As suggested in your comments, mixed-use, design, and focused growth are elements of the PGA.

I-010-005

The transportation network assumed as part of Destination 2030 and used in modeling for the EIS includes the completion of light rail service from Northgate to Sea-Tac airport.

I-010-006

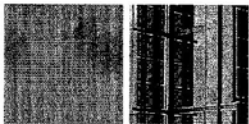
Comment noted regarding using HOV lanes as HOT lanes.

I-010-007

Your comment is noted. Currently, the region's ports do not have plans to relocate their activities outside the region. Such decisions are not being contemplated through the Vision 2040 update process.

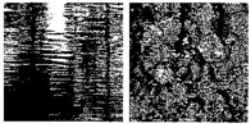
I-010-008

Comment noted. Thank you for the links to the supporting information.



VISION 2020 Update Draft Environmental Impact Statement

Comment Form



What's your vision for the future of the central Puget Sound region? We want your input and need to hear from you!

The public comment period ends on Monday, July 31, 2006.

The public is encouraged to provide thoughts, ideas, and concerns on the Draft Environmental Impact Statement to help select a preferred growth alternative. Comments should 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 vision2020update@psrc.org.
- By attending any of PSRC's board or committee meetings. 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 develop a preferred alternative. 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/datapubs/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

Dore PADELFORD

ORGANIZATION

ADDRESS

763 2846

CITY

SEATTLE

STATE

ZIP

98111

E-MAIL

DPF@PSP.NET.NET



Check here if you would like to be added to the project mailing list.



I-010-009

Comments noted.

YOUR INPUT IS NEEDED

The region has some tough choices to make to get from four broad alternatives to a single vision that reflects our shared values and aspirations. Participants in the review process are asked to comment on the growth alternative that appears to best meet the needs of the region. You are welcome to mix and match portions of the alternatives that have been included in the Draft Environmental Impact Statement to form a hybrid that represents an alternative you prefer.

PLEASE CONSIDER COMMENTING ON THE FOLLOWING SUBJECT AREAS:

1. The environmental baseline (see Chapter 2)
2. The growth distribution alternatives — including ideas for a Preferred Growth Alternative (see Chapter 4)
4. Environmental justice (see Chapter 6)
3. Discussion of multicounty planning policies (see Chapter 7)

COMMENTS:

I-010-009

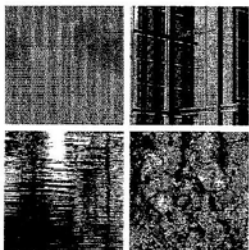
I believe the effective capacity* of the freeway overwhelms effects from eg small cities, large cities etc.
re the graph at vision 20+20 update
Issue Paper on Transportation
1-12-06
page 24

* Keeping the "traffic paper" at their maximum dimension the further "east" point on the graph.

PLEASE ADDRESS COMMENTS TO:

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





VISION 2020 Update 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 DAVID F. PLUMMER

COUNTY KING

ADDRESS 14414 NE 14TH PL

CITY BELLEVUE STATE WA ZIP 98007-4001

E-MAIL pdf3@comcast.net

☒ Check here if you would like to be added to the project mailing list.

Puget Sound Regional Council

(Comments on reverse side)

Executive Summary

31



YOUR INPUT IS NEEDED

The region has some tough choices to make to get from four broad alternatives to a single vision that reflects our shared values and aspirations. Participants in the review process are asked to comment on the growth alternative that appears to best meet the needs of the region. You are welcome to mix and match portions of the alternatives that have been included in the Draft Environmental Impact Statement to form a hybrid that represents an alternative you prefer.

PLEASE CONSIDER COMMENTING ON THE FOLLOWING SUBJECT AREAS:

1. The environmental baseline (see *Chapter 2*)
2. The growth distribution alternatives — including ideas for a Preferred Growth Alternative (see *Chapter 4*)
4. Environmental justice (see *Chapter 6*)
3. Discussion of multicounty planning policies (see *Chapter 7*)

COMMENTS:

I-011-001

① There is undue emphasis, and pejorative characterization of "sprawl." The EIS should eliminate this bias and replace it with a more objective, balanced discussion of distributed population/job growth.

I-011-002

② There is no discussion of how to reduce OFM's allocation/projection of population growth to the 4-county region.

I-011-003

③ There is too much emphasis on continuation of existing regional development/growth policies, and no discussion of possible new policies.

I-011-004

④ There is no discussion of how to deal with the problem of unaffordable housing near (present) employment centers.

PLEASE ADDRESS COMMENTS TO:

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

I-011-001

PSRC does not agree that the use of the word "sprawl" leads to a biased analysis of environmental impacts within the FEIS. None of the alternatives are defined as "sprawl." More typically, the FEIS refers to "dispersed" growth patterns when discussing the alternatives.

I-011-002

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-011-003

Comments noted. During scoping, and throughout the update process, most commentators asked for VISION 2040 to build from existing documents such as the adopted VISION 2020 and local comprehensive plans. It does this, while also addressing other new issues.

I-011-004

VISION 2040 promotes addressing housing affordability. VISION contains a stand-alone housing policy section, as well as housing-related actions. While they do not set affordable housing targets for local jurisdictions, they do speak to creating a regional housing action plan, which will likely address many of the issues raised in your comment. Also, affordable housing is addressed as an element of the Regional Growth Strategy.

26 July 2006
Revise 28 July 2006

Norman Abbott
State Environmental Policy Act Responsible Official
Puget Sound Regional Council
Seattle, Washington

cc: Bellevue City Council

Re: PSRC Vision 2020 Update Draft EIS dated May 2006

Dear Mr. Abbott:

I have attached my comments on the PSRC Vision 2020 Update Draft EIS dated May 2006. I hope you will include and provide responses to the issues I have raised regarding this draft EIS.

Sincerely,



David F. Plummer

14414 NE 14th Place
Bellevue, WA 98007

**Comments ON PSRC VISION 2020 Update Draft Environmental
Impact Statement dated may 2006**

1. General Comments

I-011-005

1.0 Section 1.A. identifies RCW 36.70A as the State authority for developing and promulgating Vision 2020 Update and its accompanying DEIS. However, the relevant RCW provisions of the GMA (e.g., RCW 36.70A.020 etc.) do not impose rigid requirements to develop multi-county planning policies that encourage/support "compact" (i.e., higher density) living spaces. Further, there is no evidence that any extant "trends ... have created increased numbers of low-density, auto-dependent communities." Rather, there are two primary reasons for the increasing use of automobiles for transportation between residential areas and places of employment in the Puget Sound Region:

a. First, the planning and land use policies of the cities and counties of the Region are not "trends," they are immutable government policies that have resulted in unaffordable residential housing in close proximity to Regional employment centers thus increasing the demand for use of the Regional transportation system;

b. Second, the artificial constraints on the availability of buildable lands (within the boundaries of the Region's urban growth areas) has led to an inevitable increase in economic land rents within the urban growth areas, further exacerbating residential housing prices, and increasing living costs for all residents of the Region.

These facts should be added to the EIS so that readers may have a better understanding of the underlying causative factors in the failure of current and prospective PSRC/Regional planning policies.

I-011-006

1.1 The DEIS substantially overstates the extent of public outreach and involvement in development of both the DEIS scope (October 2003), in preparation of the DEIS, and in obtaining public input on the DEIS. In fact, only a very small number, a minuscule percentage of the Region's citizens participated in PSRC's public meetings on the scope of the DEIS, and on the DEIS itself. For example, less than 140 persons attended both public events to obtain input on the complex issues posed by Vision 2020 + 20; most of the comments from participants were highly general, and of little significance to such an important planning process.

A tabulation of the participant's 'affiliations' is attached. As can be seen from the tabulation, rather than reflecting the inputs from a broad spectrum of the Region's lay citizens, the dominant input has come from the Region's power brokers, and the Region's elected and appointed officials who are manifestly biased in favor of continuing current land-use and transportation policies, i.e., in intensifying land use within the Region's urban growth areas, and especially in increasing the population density per square meter of buildable land. This bias is clearly evident in the descriptions of the four alternatives and should be clearly acknowledged in the follow-on EIS.

I-011-005

See 36.70A.210 for citation regarding multicounty planning policies. Also, the FEIS notes that it builds on local plans, the adopted VISION, etc. This includes other planning practices, such as Buildable Lands. However, not every statute is called out.

I-011-006

The process to develop VISION 2040 included the most extensive outreach effort PSRC has conducted in over a decade. It included three formal public comment periods, ongoing outreach to local jurisdictions and other agencies, videos, advertisements, open houses, public meetings, and the special editions of the Regional VIEW newsletter. This includes recurring, monthly meetings with elected officials representing the region's residents and employees.

I-011-006

Although additional written comments were submitted by individuals, groups, and agencies, the Vision 2020 + 20 DEIS does not reflect any broad public outreach or involvement. It is merely the extension of PSRC staff's views, and those of the Region's municipal and county elected and appointed government bodies, and especially the views of the Regional power brokers (land developers, real estate agencies and business interests).

From about 15 November 2003 through 31 March 2004 PSRC received 1209 "comments" on the 'scoping' of the DEIS for Vision 2020+20. PSRC's contractor also conducted a scoping survey for Vision 2020 in November 2003; the survey collected input from a sample of 915 Region residents.

In the case of comments on the scoping 'announcement,' almost 65% of the comments were from 'organizations' and 'local government officials.' The survey questions were clearly designed to elicit responses that would favor PSRC's plan to continue the intensification of land use and population density within the Region's urban growth areas. For example, respondents were asked if they favored building mass transit; 83% responded that they somewhat or strongly favor such action. However, if respondents had been asked "do you favor building mass transit even though highway congestion is expected to continue to increase when such systems are built?" the responses might have been quite different. Also, respondents were not asked: "should transit users pay for the life cycle (acquisition, ownership, retirement) costs of new mass transit systems?"

PSRC's "Public Participation Plan" (25 April 2002) states that 'effective public notification and participation takes time and effort ... yet is essential to sound decision-making.' PSRC's Vision 2020 Update 'public involvement plan' states that, among other objectives, the Council's aim is to create a better 'product' (DEIS??) by 'facilitating dialogue with a broad cross-section of citizens in the regional planning process.' Considering that there are 10 Issue Papers and 5 Informational Papers in addition to the DEIS itself (which consists of 22 chapters and sub-chapters, and 4 significant appendices), it is clear that even the most diligent and dedicated citizen could not possibly hope to review this material and make informed inputs to the PSRC in the time allowed for response following the release of the DEIS on/about 1 June 2006.

PSRC should also consider that 35-40% of the Region's population is probably greater than 55 years of age; and many in the Region's population do not speak/read English. These population sub-groups may need additional time to evaluate and respond to the DEIS and the implications of the 4 alternative growth concepts. In addition, many persons in the Region's population may not have access to the internet, or may otherwise have difficulties in accessing the printed copies of the DEIS and supporting materials, especially during the recent very hot weather.

In addition to not allowing adequate time for public review of the DEIS, and failing to seriously solicit public input, PSRC's Vision 2020 public involvement plan clearly reveals PSRC's bias toward growth management and restrictive urban growth. This built-in bias is manifested in all aspects of the DEIS and its supporting documents, thus precluding any opportunity for the public to become informed of alternatives to the constraints imposed by the State growth management act, and to the derived constraints imposed by Regional municipal and county elected and appointed bodies.

I-011-007

I-011-007

See previous response regarding the amounts and types of outreach conducted for the VISION 2040 project. Also, see FEIS Appendices II-A and II-C, which describe the public outreach process and results. Lastly, the public comment periods all exceeded the duration required under state law.

I-011-008

1.2 The DEIS is heavily laced with hyperbole and unsubstantiated nonsense. For example, on page 1.4, the Region's environment is characterized as 'fragile,' when, in fact, it is quite able to sustain significant human use and exploitation, as is clearly evident from the current state of Regional development. And rather than seeking to " ... create a ... planning document (that) provide(s) a strengthened environmental policy framework ..." (whatever that is), the DEIS is an overt attempt to reinforce the same policies that have resulted in the Region's primary problems: unaffordable housing near employment centers, increasing traffic congestion, and economically inefficient use of land.

I-011-009

1.3 The DEIS is constructed in such a manner that reference to specific paragraphs is extremely difficult; sub paragraphs within major headings should have been identified by a decimal numbering system; all tables should have been labeled as *tables*, not as figures; many figure/graphical summaries give no reference to their source(s); all bulleted paragraphs should have had a specific identifier; etc.

I-011-010

1.4 There are no references given for Chapter 5.3; the applicable references should be added in the EIS (or any DEIS update). In general, there is no way to find where a given source is referenced in any of the chapters. Most of the references are poorly described, or have no way of being specifically identified or traced to their source. Some references are merely to a web site, with no specific identification of any material used from the web site.

I-011-011

1.5 There is no place in the DEIS where the buildable lands data for the 4 counties and their municipalities are summarized, and comparison shown for the 4 alternatives that would provide an indication of the changes that might be required. For example, the current buildable lands reports/analyses for King County and the City of Bellevue show that both have sufficient buildable/zoned land to accommodate growth projections through 2012, and, in Bellevue's case, through 2025-2026. This data/comparison should be added to any supplemental DEIS and the final EIS.

I-011-012

1.6 *Given the complexity of the Vision 2020+20 planning effort and documentation, the lack of an effective public outreach/involvement effort, and because there are no compelling schedule constraints, the time limit for response to the DEIS should be extended to at least 1 June 2007. During this time, PSRC should significantly increase its public outreach to a broad range of citizens in the Region so that they can better understand the implications of PSRC's plan to continue the intensification of land use and population density within the Region's urban growth areas.*

2. Specific Comments by Chapter

2.0 Chapter 4, Definition of Alternatives

I-011-008

Comment noted.

I-011-009

SEPA provides for flexibility in organization and in format. The requirements for an EIS are primarily focused on clear definition of alternatives and the identification of significant environmental impacts. Because of the regional focus of the alternatives, depictions are typically drawn from a variety of public sources, and are typically mapped using GIS data developed by PSRC or its member jurisdictions.

I-011-010

For a list of references, see FEIS Appendices, Volume I, and see VISION appendices as well. These provide a list of sources used in developing both the FEIS and VISION documents.

I-011-011

The FEIS and VISION are not based on the analysis of buildable lands, which is used in the development of local plans. VISION 2040 represents regional guidance rather than a local or comprehensive plan level of analysis. VISION 2040 covers a very large geography, looks very long range, and is less detailed than local comprehensive plans. Subsequently, the appropriate local role is for local comprehensive plans and the targeting process to then determine how it works in each jurisdiction.

I-011-012

PSRC's public involvement process and the comment period for the Draft EIS exceeds the statutory requirements under SEPA, and a lengthy extension is not required or warranted. PSRC also issued a Supplemental Draft EIS in July 2007, providing an additional opportunity for public review and comment, prior to issuing the Final EIS.

I-011-013	2.0.0 The second paragraph on page 4.16 should be deleted from the description of Alternatives; transportation system improvements would be required for all the alternatives, not just the Smaller Cities Alternative.
I-011-014	2.0.1 The Alternatives are based on a population growth that is slightly above OFM's 'medium' growth projection for the 4-county region (see attached Figure 1). The DEIS should be revised to show a new alternative with a much lower Regional population growth, for example, with Regional population growth at or below OFM's 'low' projection. This alternative should be coupled with a projected significant expansion of the Region's urban growth areas. Incorporation of such a growth vector into a specific "Alternative" would provide a meaningful contrast to PSRC's plan to continue to force more people into the Region's existing urban growth areas.
	2.1 Chapter 5, Environment Effects and Mitigation
I-011-015	2.1.0 Page 5.3.20, last sentence of " Rural Areas ": This sentence states that vehicle miles traveled and delay are highest for this alternative relative to the other alternatives. Information given in Figure 5-3-4 contradicts this statement. In general, it is not clear whether the "Rural Areas" referred to is a wholly separate alternative from the Smaller Cities alternative; this confusion should be clarified.
I-011-016	2.1.1 In general, the transportation "data" given in Section 5.3 is misleading in that it could not possibly depict correct information for the <i>Smaller Cities</i> alternative: if employment and population growth are more extensively dispersed to the Region's 'hinterlands,' the overall measures of Regional transportation system operation (congestion/delay/VMT, etc.) should show considerable improvement vis-à-vis the other Alternatives. PSRC's transportation analysis model needs to be updated/improved to reflect system performance parameters under this alternative, as it is clearly biased to favor the other 3 Alternatives.
I-011-017	2.1.2 The brief description of housing (page 5.1.10) is totally inadequate, and most of the brief comments are not accompanied by any data or references; the same is true for the 'housing discussion' in Chapter 6. For example, housing affordability is clearly impacted by the economic rent component of land costs; and land costs are (and will continue to be) much higher in the constrained urban growth areas (UGAs) than in the areas outside the UGAs. For example, 'housing' costs in the Bellevue CBD are probably in the order of \$400-650 per square foot for 'modestly-priced' condominiums; higher costs are also encountered for many other units. Although dispersing the population as in the <i>Smaller Cities</i> alternative may have higher costs for certain municipal/transportation infrastructure/services, it is not clear that total Regional costs per capita would be higher vis-à-vis the other alternatives. In general, this topic needs to be extensively expanded and documented with references in the EIS.
I-011-018	2.1.3 There is no discussion of the impact of each on the alternatives on various societal characteristics, e.g., crime rate, measures of poverty, income/ethnic

I-011-013

The text in the FEIS identifies the fact that minor adjustments were needed for this alternative to be run through the transportation modeling, meaning the results may be marginally improved over what would be the case if these improvements had not been included to run the model. Since the other alternatives did not have these changes, the FEIS identifies how the Smaller Cities Alternative was handled.

I-011-014

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.

Also, growth is not assigned to unincorporated urban areas at the potential annexation area level. The Regional Growth Strategy does, however, state a preference for growth in the unincorporated urban areas to be in areas affiliated for annexation rather than those unaffiliated, in order to promote the affiliation of all of these areas with cities for annexation. Additional detail regarding the Regional Growth Strategy's figures can be found in FEIS Appendix I-A.

I-011-015

See FEIS Appendix I-D for the complete set of transportation model results. One part of the text discusses a specific area; the other discusses the alternatives as a whole.

I-011-016

As noted in the FEIS, transportation performance suffers when jobs and population are widely dispersed to different locations from each other. Among other impacts is the depression of transit ridership and lack of density support transit service. Note that PSRC's transportation model is reviewed on a regular basis to ensure consistency with MPO requirements.

I-011-017

For more information on costs, see Costs of Sprawl paper in FEIS Appendix I-F. Also,

I-011-018	segregation, etc.; the same is true for Chapter 6. These topics should be included in this Chapter, or in a separate Chapter in the EIS.
I-011-019	<p data-bbox="291 306 695 326">2.2 Chapter 6, Environmental Justice discussion</p> <p data-bbox="233 355 947 514">2.2.0 This entire chapter has no place in the DEIS, and should be deleted; it is a considerable extension of the 'DOT-Order' policies, and there is no evidence that this type of policy has ever been clearly explored with a broad range of the Region's citizens through PSRC's public involvement process. PSRC did, apparently, take contact with certain elements/organizations in the Region concerning this policy, but there is no justification for excluding all the Region's citizens in its development. The material in the chapter should be converted to one of the 'issue' or 'informational' papers for the EIS.</p> <p data-bbox="233 521 947 586">2.2.1 There are many assertions in this chapter concerning housing, transportation, and jobs/employment that are totally unsubstantiated, and have no references or other sources provided to permit their verification.</p> <p data-bbox="233 592 947 703">2.2.2 There is no indication that "senior citizens" (who are quite likely to be members of the 'low-income' group that could be adversely affected by PSRC's policies and plans) have been considered in the evaluation of environmental impacts. This omission should be corrected in the development of a revised/expanded 'issue' or 'informational' paper.</p>
I-011-020	<p data-bbox="291 730 598 750">2.3 Appendix C, Evaluation Criteria</p> <p data-bbox="233 779 947 915">2.3.0 Delete all criteria from this appendix that are non quantitative, i.e., those measures/criteria that begin with "Overall judgment ..." should be deleted from further consideration in the evaluation process. Judgmental criteria/values are of no use in evaluating the 4 alternatives, as there is no way to understand the basis for making such judgments, and they can easily be used to influence the choice of a preferred alternative, or to develop negative or positive assessments of a particular characteristic.</p> <p data-bbox="233 945 947 1008">2.3.1 Add material to this section (for inclusion in the EIS, or to an update of the DEIS) that explains in detail exactly how 'scores' for each quantitative measure will be determined.</p>
I-011-021	<p data-bbox="233 1036 443 1055">3. <u>Preferred Alternative</u></p> <p data-bbox="233 1084 947 1195">3.0 The Smaller Cities Alternative is clearly the preferred alternative among the 4 alternatives described/evaluated by the DEIS. This alternative will provide the best possible outcome for the Region in terms of dispersing the population and employment over a much wider area, and in minimizing the environmental and social impacts of the prospective population/job growth.</p> <p data-bbox="233 1224 947 1308">3.1 The Smaller Cities Alternative could be substantially improved if a much lower population growth vector were used, and if the boundaries of the Region's urban growth areas for such an alternative were substantially expanded, or, preferably, eliminated.</p>

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.

VISION 2040 addresses housing affordability. Policies related to both of these issues are found in the multicounty planning policies chapter in the development patterns section. Related policies exist requiring that future growth target allocates be made in housing units, rather than population, which should help with housing planning. There are also policies related to monitoring housing production and supply.

I-011-018

The FEIS discussion of impacts to different socioeconomic groups is supplemental information to what is required under SEPA. Chapter 6 identifies the anticipated range of issues that may be experienced by low income or minority groups as a result of growth, and identifies impacts in a range of environmental topics. These impacts are anticipated for the general population as well, and additional details on the impacts are provided in the other FEIS sections focused on the built environment in Chapter 5.

I-011-019

While it is correct that SEPA does not require Environmental Justice analysis for actions such as the VISION update, PSRC has provided the information in the VISION 2040 Final SEIS in response to comments and suggestions from its members and others. See FEIS Chapter 6 and Appendix II-C. The SDEIS and the published Final SEIS both included a record of the public involvement efforts conducted for the VISION update and a consideration of Environmental Justice factors.

Finally, as the SDEIS acknowledges that a detailed analysis of environmental justice impacts is not warranted for the VISION update, given the lack of site-specific details, the SDEIS discussion appropriately describes common impacts to environmental justice populations in order to identify potential mitigation strategies, as well as methods that can be used to identify and involve low income and minority communities.

I-011-020

Comments noted regarding the subjective evaluation criteria. These criteria were kept and used. See FEIS Appendix I-D for more information on the application of the criteria.

I-011-021

Comment noted regarding your preferences among the alternatives. Also, see response to

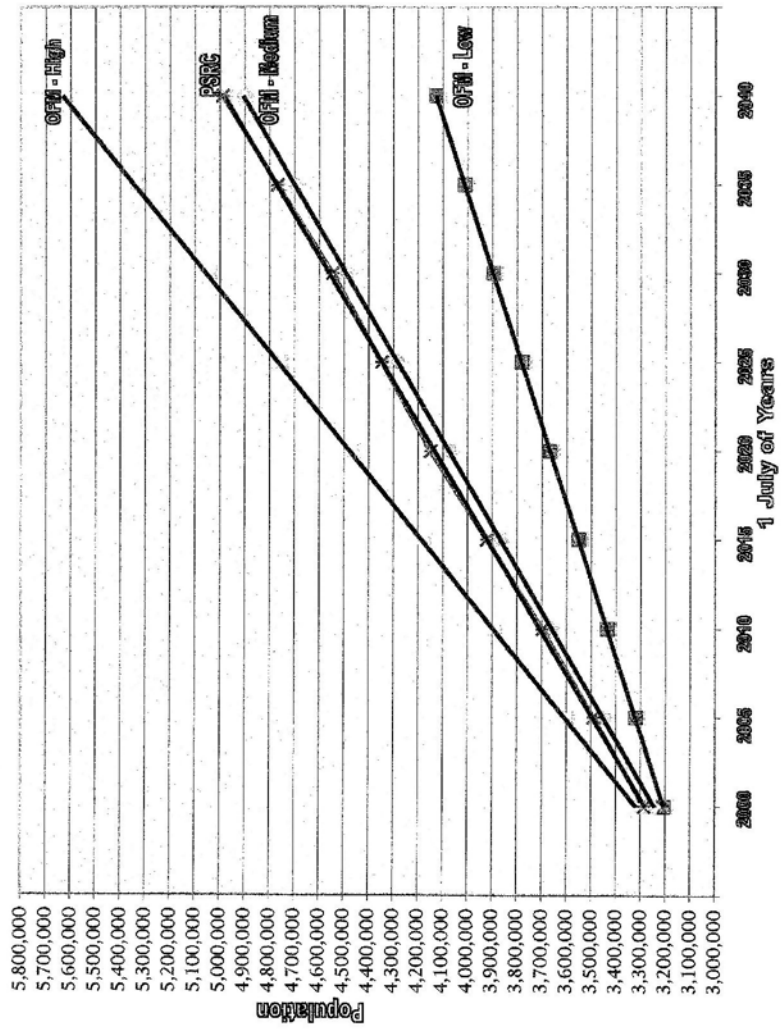
comment 014 regarding using a growth figure that is less than the regional forecast, and how the urban growth area was treated in the FEIS analysis.

Table 1. Affiliations of Participants in PSRC 2020+20 Scoping Workshop
(12 December 2003), and
PSRC DEIS Kickoff Meeting (23 May 2006)

Affiliation	Number of Persons Attending	
	Scoping Workshop	DEIS Kickoff
None/Unknown Affiliation	4	6
City Government	20	35
County Government/Agency	24	20
PSRC	32	38
Washington State Agency/WSDoT	3	3
Sound Transit/SeattleMP/Port of Sea	4	2
Municipal League, Other Gov't, and School Districts	13	7
Univ. of Washington	1	4
Business & Real Estate Groups	6	20
Puget Sound Energy, Construction & Land Development	11	–
Legal Firms	4	–
Environmental Groups & Other	17	4
Total	139	139

Source: PSRC Summary Reports for Scoping Workshop and DEIS Kickoff Meeting

Taxonomy: author



I-011-022

Comment noted regarding your preferences among the alternatives.

From: "David F. Plummer" <pdf3@comcast.net>
To: <vision2020update@psrc.org>
Date: Sun, May 7, 2006 9:28 AM
Subject: Comments on Vision 2020

Hi there!

I tried to send the following comments via your web site, but get an "incorrect address" error message. I use a Mac computer and a Safari web browser. You may want to check your web-site instructions to see if they are compatible with Mac/Safari users. Please include my response in your comment-base for the Vision 2020 Update Project:

I-011-022 > Alternative 4 is vastly superior to the other 3 alternatives: if
> population and job growth is distributed to the outlying areas of the
> region, there will be more affordable housing available to new job
> entrants; and reduced demand for expansion of, and reduced congestion
> on the regional highway/freeway routes and transit services.

Regards,

David F. Plummer

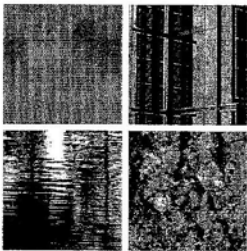
14414 NE 14th Place
Bellevue, WA 98007-4001

From: "Jackie Thomas" <jacklyn.thomas@comcast.net>
To: <vision2020update@psrc.org>
Date: Thu, Mar 16, 2006 8:37 AM
Subject: Public Input on Alternatives for Vision 2020 Update

I-012-001 | Alternative #2, managed growth focussed in already-identified centers for future growth, makes the most sense. We get more for our transportation tax dollars where densities are already concentrating. This choice would curtail pressure to move the Urban Growth Line outward (adding to sprawl). Infill and redevelopment (commercial & residential) - convenient to multi-modal transportation choices - offer the most "bang for the buck." Jacklyn Thomas, Issaquah Resident

I-012-001

Thank you for stating your preference for a regional growth alternative.



VISION 2020 Update Draft Environmental Impact Statement

Comment Form

What's your vision for the future of the central Puget Sound region? We want your input and need to hear from you!

The public comment period ends on Monday, July 31, 2006.

The public is encouraged to provide thoughts, ideas, and concerns on the Draft Environmental Impact Statement to help select a preferred growth alternative. Comments should 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 vision2020update@psrc.org.
- By attending any of PSRC's board or committee meetings. 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 develop a preferred alternative. 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/datapubs/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 Lynn L. Thompson
ORGANIZATION RETIRED
ADDRESS 1221 - 172nd AV NE
CITY BELLEVUE STATE WA ZIP 98008
E-MAIL LYNANDLEE7@AOL.COM

☒ Check here if you would like to be added to the project mailing list.



YOUR INPUT IS NEEDED

The region has some tough choices to make to get from four broad alternatives to a single vision that reflects our shared values and aspirations. Participants in the review process are asked to comment on the growth alternative that appears to best meet the needs of the region. You are welcome to mix and match portions of the alternatives that have been included in the Draft Environmental Impact Statement to form a hybrid that represents an alternative you prefer.

PLEASE CONSIDER COMMENTING ON THE FOLLOWING SUBJECT AREAS:

1. The environmental baseline (see Chapter 2)
2. The growth distribution alternatives — including ideas for a Preferred Growth Alternative (see Chapter 4)
4. Environmental justice (see Chapter 6)
3. Discussion of multicounty planning policies (see Chapter 7)

COMMENTS:

- I-013-001** I REALIZE THIS EIS IS A DRAFT BUT I FEEL IT IS MUCH TOO VAGUE. IT SAYS TO CONSIDER ALL BUT DOES NOT SAY HOW TO MAKE DECISIONS, HOW MAKE DIRECTION TO IMPLEMENT, WHAT IS NEEDED. THE REAL "POLICY" IS MISSING. AUTHORITY OF PSRC IS MISSING. HOW PSRC WILL WORK WITH THE OTHER AUTHORITIES IS MISSING.
- I-013-002** THIS IS A 40 YEAR VISION. IF A NEW TRANSPORTATION CORRIDOR IS NEEDED FOR PUGET SOUND THEN IT SHOULD BE "CONCLUDED" AND "SAID" (FOR
- I-013-003** INSTANCE). IF MUCH HIGHER DENSITY LIVING CENTERS ARE THE WAY TO GO, IT SHOULD BE RECOMMENDED & SAID. I FEEL HOUSING (AFFORDABLE HOUSING) WILL HELP MAKE DECISIONS.
- I-013-004** THURSTON COUNTY?
* A LOT OF MONEY IS BEING SPENT IN THIS EFFORT, IT SHOULD BE A SINCERE, REAL AND EFFECTIVE EFFORT OR IT SHOULD NOT BE DONE.

PLEASE ADDRESS COMMENTS TO:

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



I-013-001

The purpose of the EIS was not to answer the questions suggested in your comment. That information is contained in VISION 2040 which contains the region's multicounty planning policies.

I-013-002

Comments noted. See VISION 2040 policies which address these issues.

I-013-003

Comments noted. The Preferred Growth Alternative, by focusing growth into already urbanized areas, seeks to promote mixed-use development and affordable housing options.

I-013-004

Thurston County is not included in the four-county central Puget Sound region. Thurston County's ties to the region are discussed in the FEIS under cumulative effects, but the FEIS alternatives do not attempt to define future growth alternatives for Thurston County.

June 7, 2006

From: Michele Leslie
To: Ben Bakken; Ivan Miller; Norman Abbott; Robin McClelland; Sheila Rogers
Date: 6/7/2006 2:14:32 PM
Subject: Fwd: VISION 2020 Update Comment

This came in through PSRC's website.

>>> <FormProcessing@psrc.org> 6/7/2006 1:51 PM >>>
Hello!
This is results of submitted form by 65.102.172.170.

Submitter Email : FormProcessing@psrc.org

Fields:

02.contactname = Darby Watson, AICP

04.address = 801 2nd Ave, Suite 501

05.city = Seattle

06.state = WA

07.zippostalcode = 98104

11.emailaddress = dwatson@lmnarchitects.com

12.comments = I think that the larger cities alternative addresses the most issues facing our region. I think the metropolitan cities have been relied on too heavily to absorb growth. A better distribution would offer more alternatives for housing and a greater range of affordable opportunities.

13.Send = Submit

mailto = mleslie@psrc.org

mailtype =

subject = VISION 2020 Update Comment

I-014-001

Thank you for stating your preference for a regional growth alternative.

I-014-001

June 8, 2006

From: Michele Leslie
To: Ben Bakkena; Ivan Miller; Norman Abbott; Robin McClelland; Rocky Piro
Date: 6/8/2006 11:47:31 AM
Subject: Fwd: VISION 2020 Update Comment

From the PSRC Website

>>> <FormProcessing@psrc.org> 6/8/2006 11:03 AM >>>
Hello!
This is results of submitted form by 67.135.33.66.

Submitter Email : FormProcessing@psrc.org

Fields:
02.contactname = Gretchen Weber
04.address = P.O. Box 5943
05.city = Lynnwood
06.state = WA
07.zippostalcode = 98046
11.emailaddress = comtransgretchen@yahoo.com

I-015-001

12.comments = I definitely prefer option #2, with the focus of residential and employment growth in bigger cities. To make this work, there needs to be some critical attention placed on transit availability and ease within and among the urban areas, AFFORDABLE housing within the urban areas and pedestrian friendly/sustainable communities.
13.Send = Submit
mailing list =
mailto = mleslie@psrc.org
subject = VISION 2020 Update Comment

I-015-001

Thank you for stating your preference for a regional growth alternative.

From: "Michael Hintze" <mhintze@AHBL.com>
To: <vision2020update@psrc.org>
Date: Thu, Jul 27, 2006 4:07 PM
Subject: DEIS comment

Since your online comment form appears to not functioning, I will email the following public comment on the DEIS:

I-016-001

After having read the Executive Summary of the DEIS and participating in the first meeting of the Urban Design focus group, I am sufficiently befuddled that the DEIS assumes that it is going to be business (growth) as usual for the next 40 years. It fails to consider that the way our region organizes itself from a housing, transportation, and economic point of view could be quite different given increasing energy costs, climate change, etc. I realize that the vision update is a very political process, and that such analysis is not really part of PSRC's responsibilities, but it should be, especially at the visioning stage-it's not just about allocating population. The PSRC and the Vision 2020 +20 process should be setting the tone for the fact that factors shaping growth and development patterns in 2040 or 2060 are going to be a lot different than the factors shaping the region today-a straight line projection of trends is not sufficient nor realistic. The Preferred Alternative should at least make mention of how inevitably increasing energy costs will effect the region's transportation systems, development patterns, and economy.

I-016-002

Michael Hintze
Planner

TACOMA * SEATTLE

206.267.2425 TEL

206.267.2429 FAX

www.ahbl.com

Civil Engineers * Structural Engineers * Landscape Architects *
Community Planners * Land Surveyors * Neighbors

I-016-001

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-016-002

The FEIS does include analysis of energy impacts related to growth. See Chapter 5.10.

From: Ivan Miller
To: Robin McClelland
Date: 8/4/2006 12:10:31 PM
Subject: Re: Fwd: Breinholt...

Robin,

Please add this to the distribution of additional information for the DEIS comment letter binders. This is the attachment that goes with letter #004.

-Ivan

>>> "Keith Breinholt" <keith.breinholt@duvalwa.gov> 7/12/2006 3:24 PM >>>
Thanks Doreen.

Rocky, Thanks for your help.

I've CC'd our mayor and members of our land use committee because we have been discussing these issues for a couple weeks now.

I think we all agree that we need to focus growth in and around the cities. Where the alternatives and opinions differ seems to be in focusing growth into the Large cities or in a distributed pattern into the suburban or smaller cities.

As I read through the DEIS and supporting documents there seems to be several underlying assumptions that just don't hold true for densely populated large cities but no caveats are mentioned or noted to make this distinction. So I have been trying to find the source of these assumptions or research that supports them to find what the underlying assumptions or conditions are assumed.

The arguments for compact growth versus distributed growth and most if not all the assumptions about cost of services seem to be summarized in the informational paper "Cost of Sprawl." (<http://www.psrc.org/projects/vision/pubs/costofsprawl.pdf>) I think we all agree that unrestricted sprawl is not an option and using the arguments made in this paper for our alternatives is like comparing apples to oranges.

As I read through the arguments made and read through the summaries of the research referenced in that paper I noticed that all of them made the same faulty assumption that the cost of providing a per unit service or building a unit of infrastructure is constant for both high density, compact, distributed and sprawling development. (I.e. It costs the same to build one mile of road no matter the density of development. Costs of services and necessary services are the same no matter the density of development.) When in fact this is not the case.

A prime example is the replacement of the Alaskan way viaduct versus widening Novelty Hill road to five lanes and adding connectors. They are approximately the same length in construction yet the cost of replacing the Alaskan Way viaduct is 50 to 100 times the cost of widening Novelty Hill road and adding new connecting roads.

Consider the difference in cost of replacing or upgrading an older water main in downtown Seattle to handle increased volume versus adding a new water main in say Redmond or Issaquah. It would be easy to show that the costs for a Seattle watermain replacement would once again be nearly 10 to 100 times that in suburban areas because of increased traffic impacts, street and utility disruption, and so on.

Or the cost of adding capacity to local sewer treatment plants versus the cost of the new Brightwater plant. And the potential environmental impact of a failure of Brightwater or any of the new sewer lines versus expanding and using the distributed resources of multiple cities.

Assumptions about providing police and emergency services are assumed to be higher in distributed

I-017-001

Comment noted. As noted in sections of the FEIS, with focused growth, there are economies of scale for many issues, and a less costly pattern of growth to serve. VISION 2040 actions call for collaborative work at the regional level to seek to create additional resources for infrastructure.

I-017-002

Comments noted. Also, see previous responses regarding funding initiatives in VISION 2040.

I-017-001

I-017-002

I-017-002

growth because of lower response times and extended travel time. This may be true for unincorporated areas but for our alternatives that distribute growth among cities this is like comparing apples to oranges. We are not talking about Seattle providing the service to outlying areas. In a distributed growth model each suburban city provides its own service to meet growth. Also, it has been shown that higher density development also has higher crime rates per capita as well as special training needs for emergency personnel responding to high rise emergencies. Our emergency response times and crime rates are actually lower than Seattle's and increasing the density of Seattle would actually increase the crime rate and necessitate higher personnel and training costs that offset the number of personnel per capita. Is there research that makes this comparison and shows otherwise?

I-017-003

When I started looking at the computer model used to estimate traffic flow there is an assumption that distributed growth would increase travel distances and cause higher levels of pollution. However, this ignores the fact that putting more vehicles onto already strained capacity roads causes gridlock. Compare my 25-30 minute commute from Duvall to Redmond at an average speed of 35 miles per hour and a 20 (off peak) to 60 minute (peak) commute from Seattle to Redmond at an average speed of 15-45 miles per hour. Even though the distance from Seattle to Redmond is about the same the commute time is greater during peak hours, in addition the actual amount of gasoline burned is more than likely greater because of less fuel efficiency due to gridlock.

There is another assumption that light rail or similar mass transit services are cheaper per rider and offset the increased commutes into Seattle. Take a look at the cost per rider of the proposed mono-rail, or the Tacoma to Seattle rail line. The cost on the proposed monorail was estimated at ~\$1000 per rider when you include the cost of building, operating, maintaining and the interest on the funding. The cost per rider on the Seattle-Tacoma rail line as of last fall was ~\$123 per rider but with the doubling of ridership this spring due to gas prices this may be as low as \$60 per rider. Tax payers are subsidizing every rider on these projects at a cost greater than buying each rider their own vehicle and paying for the gas. When you do find cost efficient rail projects you will find that the majority of the rail line was [originally] built on either an existing right of way or in low density suburban areas. (e.g. Salt Lake, Denver, Portland, ...)

I-017-004

One last observation: The counter argument for lower cost of development in suburban cities at the end of the "Cost of Sprawl" issue paper says surrounding municipalities subsidize the infrastructure needs of smaller communities. This ignores a very key issue; except for maintenance, road and infrastructure projects are mostly paid for by county, state and federal dollars which come out of everyone's tax pocket. We all pay for large projects regardless of where we live or where the project is built. So the biggest bang for the buck is where we can provide the service or infrastructure for the lowest cost.

The executive summary, and each section of the DEIS, provide approximately the same summary with small variations. They all seem to be based on the same set of assumptions about costs and environmental impacts as noted above. Shouldn't the variations or inapplicability in assumptions be noted to make a reasonable comparison?

If not then can you show me any studies that actually address or include the missing variables of building costs in high density versus distributed density areas and increased 'need' for emergency and other services in large cities versus smaller cities?

I-017-005

Your prompt reply is important so that we have time to read them before submitting our comments on the DEIS?

Thanks again Rocky,

Keith L. Breinholt
Councilmember, City of Duvall
(206) 715-0611

"Do what you can, with what you have, where you are." - Theodore Roosevelt

From: Keith Breinholt

I-017-003

See previous responses, as well as data in the FEIS, regarding economies of scale created by focusing growth and creating density. While urban area infrastructure is costly, it serves many more people and employees, lowering the per-unit cost.

I-017-004

Comments noted. Note that the largest source of funding for transportation investments is private funding, paid by individuals for their own vehicles and related expenses.

I-017-005

The requested communication with staff did occur.

Sent: Sunday, July 02, 2006 6:26 AM
 To: Doreen Booth; Jeffrey Possinger
 Cc: Jeffrey Possinger; Will Ibershof; Gary Gill; Dianne Brudnicki;
 Gerard Cattin; Jason Gardiner; glen_kuntz@cdkconstruction.com;
 k.breinholt@verizon.net; Dianne Brudnicki; kathy.lambert@metrokc.gov
 Subject: Sources of growth in WA and King County...

Gary, Jeffrey and Doreen,

Last week we were having a discussion of the PSRC growth estimates for the 2020+20 update. And in our Land Use Committee meeting we discussed the various alternatives up for comment.

Yesterday the King County Journal printed an article "Local Cities drive state growth" which shows population trends that are contrary to the PSRC favored Metropolitan and Big Cities alternatives.

<http://www.kingcountyjournal.com/apps/pbcs.dll/article?AID=/20060701/NEWS/607010322.htm>

Please note that the rural and suburban areas are numerically growing at more than double the rate of Seattle and adjoining municipalities. In fact many urban areas adjoining Seattle (SeaTac, Medina, Mercer Island, Tukwila, Lake Forest Park, Clyde Hill and Yarrow Point) actually decreased in population.

This trend is exactly the opposite growth scenario that PSRC is proposing in their favored metropolitan and big cities growth alternatives. This trend is in fact closer to the Suburban or Small Cities alternative.

I double checked the state office of financial management (OFM) figures for census and growth forecasts, as well as WSDOT growth forecasts and found that the real growth in King County is in the outlying areas...not Seattle and Bellevue.

http://www.ofm.wa.gov/pop/poptrends/poptrends_05.pdf

<http://www.wsdot.wa.gov/planning/wtp/datalibrary/population/countiespopgrowth.htm>

<http://www.ofm.wa.gov/pop/gma/default.asp>

To put this in context; Seattle at 573,000 people is more than 100 times the size of Duvall and grew by 9624 people over the last five years. If all current developments in Duvall moves to completion, Duvall will grow at a rate of 50% of Seattle's growth rate despite the difference in size. I think you will find the same pattern in the Everett and Tacoma areas, the growth actually occurs in suburban and rural areas...not in the larger cities.

Over the last five years the growth rate in the Snoqualmie Valley, Maple Valley, Issaquah and Redmond area more than doubled the growth rate of Seattle and Tacoma combined. Given the fact that Microsoft is aggressively hiring and relocating 10 to 15 thousand people to the Redmond area I expect this pattern to continue for the next five to ten years if you include the families, jobs and other services that must come with those new hires.

No matter what ultimately gets chosen for the PSRC preferred growth alternative the reality is that

I-017-006

Comments regarding the article were noted at this time. For clarification, at this point in the process (subsequent to the release of the DEIS), there was no "favored" or Preferred Growth Alternative.

I-017-006

I-017-007

Comment noted.

I-017-007

Redmond and surrounding areas are going to receive a huge amount of growth for the foreseeable future and will more than likely outstrip the growth in Seattle. We need to ensure that the members of the PSRC understand that regardless of what they choose for a favored alternative the majority of growth in both population and jobs is going to occur around Redmond for at least the next five to ten years.

(Can I state that more clearly without repeating it again?)

Keith L. Breinholt
Councilmember, City of Duval
(206) 715-0611

"Do what you can, with what you have, where you are." - Theodore
Roosevelt

From: "Cora Nixon" <cnixon@bcc.ctc.edu>
To: <vision2020update@psrc.org>
Date: Mon, Jul 31, 2006 3:14 PM
Subject: Vision 2020 - comments

O-001-001 Bellevue Community College has been investigating the residential origin of our students over a number of years. Based on our own analysis, the trends we are seeing fit between your "Larger Cities" and "Smaller Cities" scenarios. Increasingly more of our students are coming from east of Issaquah. When we examined students' employer locations, though, they were mostly in metro areas.

Cora Nixon
Research Analyst
Office of Institutional Research
Bellevue Community College
3000 Landerholm Circle SE, B205A
Bellevue, WA 98007
425.564.5070
425.564.4136 (FAX)

O-001-001

Thank you for providing additional information about the housing and employment characteristics of the college's students.

Norman Abbott
SEPA Responsible Official
PSRC
1011 Western Ave, Suite 500
Seattle, WA 98104 – 1035

VISION 2020 DEIS

Dear Mr. Abbott,

I am pleased to submit the following comments to the draft environmental statement for VISION 2020 on behalf of the Bicycle Pedestrian Advisory Committee for the Puget Sound Regional Council.

NETWORK OF FACILITIES

When addressing the regional transportation needs, we urge that VISION 2020 develop a regional plan that creates a network of facilities for all types of riders which would include on-street facilities and an off-road network of trails. The network should include regional, countywide, sub-region and local facilities.

Design the network based on best practices examples that are designed to increase accessibility for transportation and recreation. Don't relegate bicyclists to alternative routes; assume that bicyclists and pedestrians want to go to the same destinations as motorists.

CONNECTIVITY

We urge the Regional Council to focus on transportation connectivity – including connections with roadways and transit service and facilities and to consider the needs of all users of the system. This includes eliminating missing links and barriers.

Focus should also be on connecting centers via the regional network facilities similar to transit and HOV network. The system should also link high-density destinations and focus on moving people not cars.

Focus funding on connectivity between modes of travel

COMPLETE STREETS

- All transportation projects should accommodate all users – require assessment for complete streets – think through how facilities can serve all potential users
- Shift funding for bicycle/pedestrian projects away from mitigation to “active” transportation

O-002-001

Thank you for your suggestions. These strategies are mirrored in the current Destination 2030, and the Final EIS mitigation discussion has been updated to more explicitly reference these strategies. In addition, the multicounty planning policies supporting the Preferred Growth Alternative includes policies addressing connectivity, system effectiveness, transportation options, and mobility.

O-002-001

O-002-002

GROWTH MANAGEMENT/PLANNING

- Focus planning on the development of the regional bicycle/pedestrian network that fits within with the growth strategy. Require new development to address bicycle/pedestrian accessibility, mobility and facilities.
- Examine current approaches to parking requirements.

CONTEXT-SENSITIVE

O-002-003

- Provide guidance for facilities that serve the urban area – important to address context-sensitive design. This allows for a spectrum of transportation treatments to be addressed – instead of focusing on designing the urban environment for vehicles.
- Take into account that bigger roads are not always better – while they may be faster, they can also be less safe; have negative impacts on adjacent neighborhoods and communities; and are more expensive than the alternatives
- In designing transportation facilities, emphasize design standards for other modes besides automobiles – priority should be on streets that function better for all users, not just drivers.

O-002-004

MODALITY

- The update could be more modal-neutral focused on movement of people on complete streets networks to provide real balance with modal connectivity to the transportation system.

Thank you for the opportunity to comment. Please do not hesitate to contact me if you have any questions.

Sincerely,

Barbara Culp
BPAC Chair

O-002-002

VISION 2040 seeks to better link land use and transportation, while the alternatives analysis used the network in the adopted metropolitan transportation plan, Destination 2030. As VISION 2040 is being adopted, the Destination 2030 update has begun to better align it with VISION 2040.

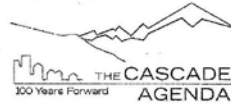
O-002-003

VISION 2040 has addressed these issues with policies and narrative related to design, multimodal facilities, and reduced impacts from transportation.

O-002-004

The alternatives do not assume any particular modal emphasis, and the future transportation system is based on the network and strategies defined in Destination 2030, which addresses all modes of transportation. The transportation measures of effectiveness, the mitigation measures, and the multicounty planning policies also all acknowledge a variety of modes, and emphasize increased modal options throughout the region.

615 Second Ave, Suite 625, Seattle WA, 98104
phone: 206-292-5907 fax: 206-292-4763
cascadesagenda.com



July 31, 2006

J. W. Allen
Managing Member, Allen & Company, LLC

Sam Anderson
Executive Officer of the Master Builders Association
of King and Snohomish Counties

Belle Bernth
President of Ward Rich, Inc.

Charley Bingham
Former Riverhousier Executive

Phyllis Campbell
President of the Seattle Foundation

Kathie Cassell
VP of Airplane Programs Finance, Boeing Commercial Airplanes

Bob Emerald
Former Snohomish County Executive

Gene Duvernoy
President of Cascade Land Conservancy

Mimi Gates
Director of Seattle Art Museum

Dennis Hayes
President and CEO of the Bellini Foundation

John Howell
Partner, Cedar River Group

Sally Jewell
President and CEO of REI

Kerry Johnson
Partner, Preston Gates and Ellis

Rita Jordan
President of Downtown Seattle Association

Ron Judd
Public Policy Advisor

Martha Kongsgaard
President, Kongsgaard-Goldman Foundation

Steve Leach
President and CEO of Greater Seattle Chamber of Commerce

Jerilyn McIntyre
President of Central Washington University

Ken Miller
Washington Farm Forestry Association

Colin Mosley
Chairman and President, Green Diamond Resource Co.

Steve Reynolds
Chairman, President and CEO of Puget Sound Energy

Norman Rice
Vice Chairman of Capital Access, Former Mayor of Seattle

John Riveland
CEO of Wells Fargo, Pacific NW Region

Charles Roper
President, Institute for Community Change, Former Mayor of Seattle

Bill Rockelshaus
Chair, Salmon Recovery Funding Board, Former EPA Administrator

Joe Ryan
President, Washington Environmental Council

Bob Santos
Former Executive Director of InterTrio and Former Regional Director
of the Department of Housing and Urban Development (HUD)

Ron Sher
Sarasanka Developments

Maryanne Tregay Jones
Board Chair, Cascade Land Conservancy

David Thorsud
Dean Emeritus, College of Forest Resources, University of Washington

Craig Deland
President and CEO of Russell Investment Group

Puget Sound Regional Council
Norman Abbott, SEPA Responsible Official
cc: Robert Drewel, PSRC Director
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

Dear Mr. Abbott,

On behalf of the **Cascade Agenda Leadership Team**, thank you for the opportunity to comment on the Draft Environmental Impact Statement for the VISION 2020+20 Update. 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 decision.

The comments below reflect the endorsement of the Cascade Agenda Leadership Team (Abstain: Robert Drewel)

Sincerely,

Gene Duvernoy
(on Behalf of the Cascade Agenda Leadership Team)

Date 7-31-06



The Cascade Agenda: Vision 2020 Update Draft EIS Comments

We at The Cascade Agenda support the efforts of the Puget Sound Regional Council to establish a preferred strategy for accommodating the region's growth. Considering the four alternatives presented in the DEIS, *The Cascade Agenda* prefers the Metropolitan Cities growth alternative. Based on our analysis, however, all four alternatives are insufficient to address the range of issues facing our region over the next forty years. **The Cascade Agenda, therefore, recommends the addition of a fifth alternative, a Hybrid alternative.** Our written response to the Draft EIS includes four major recommendations described below. Following the recommendations are appendices containing more detailed analysis and comments.

O-003-001 1. Hybrid Alternative Recommendation

The *Hybrid Alternative* focuses the majority of growth in the metropolitan cities while providing the opportunity for other cities to accommodate population growth in a way that minimizes overall land consumption. *The Hybrid Alternative* represents the region's best opportunity to develop diverse and vibrant cities as great places to live, create a strong regional economy, and foster preservation of our natural environment.

The Cascade Agenda recommends the following hybrid:

- The majority of residential and job growth would occur in Urban Centers (similar to the *Metropolitan Cities Alternative*)
- Job and residential growth would also be permitted in smaller incorporated areas. These areas would be encouraged, through increased allocation of infrastructure funding, to receive development rights from nearby rural and/or resource lands via a Transfer of Development Rights (TDR) Program.

The Hybrid Alternative better addresses the multiple interests and goals of the region than the four alternative presented in the DEIS. In particular, the Hybrid alternative addresses: (1) environmental protection, (2) economic equity for landowners and (3) the opportunity for smaller communities to grow if they choose.

✓ Hybrid Alternative Consistent with the Scope of Environmental Review for VISION 2020 + 20

The scoping process for VISION 2020 + 20 suggests, among other things, the VISION Update place additional emphasis on environmental issues including but not limited to:

- Protect agricultural lands and other resource lands,
- Maintain and restore habitat,
- Limit fragmentation of natural systems,
- Protect parks and open spaces
- Encourage green development
- Address climate protections and
- Protect and improve the integrity of the air, soil and water.

O-003-001

The Preferred Growth Alternative responds to these comments, and is a hybrid that seeks to bend trends, and result in a growth pattern that is both ambitious and achievable. Growth is focused in cities and centers. Also, VISION 2040 policies respond to the environmental issues noted in this comment and contains TDR provisions.



O-003-001 Furthermore, the scoping review states explicitly that the new plan "should add more robust descriptions of the real economic and cultural significance and role of rural areas and rural activities."

✓ Hybrid Alternative is Consistent with *The Cascade Agenda*

Current growth patterns – as characterized in the Growth Targets Extended Alternative - would continue to consume significant amounts of non-urban lands through the proliferation of large-lot development while accommodating a relatively small population increase. By allocating residential and employment growth to the densest urban areas and to smaller cities that receive development rights from non-urban landscapes, the *Hybrid Alternative* would reduce the development pressure on rural and resource lands and maximize residential development within cities, large and small. The Hybrid alternative, therefore, provides the framework most consistent with the principal goals of *The Cascade Agenda* – landscape scale conservation coupled with housing choices and a vibrant economy.

O-003-002 2. Use of TDR Program to Address both Economic and Environmental Goals

PSRC should establish Transfer of Development (TDR) programs which facilitate the expansion of a sustainable, robust region-wide TDR market. Such programs would:

- Provide mechanisms to move the development rights off priority natural areas, working farms and working forest lands onto those more suitable for development.
- Establish criteria for appropriate sending and receiving sites.
- Identify specific areas to receive development transfers.
- Set TDR ratios and other incentives to ensure appropriate market pricing for development rights. Pricing ratios must provide fair economic incentives for land owners and developers.
- Establish simple and effective TDR transaction procedures for land owners and developers.

O-003-003 3. Integrate Infrastructure Requirements Within the DEIS Planning Process

PSRC should plan for the infrastructure needs and costs required by communities to adopt growth targets under any alternative. Many communities are concerned about the pace of infrastructure keeping up with increasing growth targets. *The Cascade Agenda's Hybrid Alternative* addresses this by encouraging priority for infrastructure investment be given to cities with active TDR programs in exchange for accepting density from rural and resource lands.

O-003-004 4. Address the Impacts of Ongoing Rural and Resource Land Consumption

PSRC should take into account and adopt policies which address the impacts of rural and resource land consumption. The DEIS alternatives do not explicitly recognize growth and its associated impacts occurring outside the urban area. However, even limited or gradual development of scattered lots in rural and resource lands will have negative impacts related to costs, environment, rural character and economic viability of resource businesses. The working landscapes in the Central Cascades non-urban areas contribute significantly to the regional quality of life. Conversion of these lands is imminent and permanent. It is imperative that PSRC address this issue and provide sufficient analysis to disclose the real impacts associated with the development of non-urban areas across the region.

Cascade Agenda staff is available to meet with PSRC members to discuss these recommendations in detail. We are grateful for the opportunity to participate in the Visions 2020 Update planning process and look forward to ongoing participation.

O-003-002

VISION 2040 addresses this issue and contains a policy and actions related to Transfer of Development Rights. Further, PSRC is engaged in the Regional TDR project that was established by the state legislature during the 2007 session.

O-003-003

VISION 2040 calls for prioritizing funding in centers. Also, VISION 2040 actions call for collaborative work at the regional level to seek to create additional resources for infrastructure. Neither of these are tied explicitly to TDR.

O-003-004

The Preferred Growth Alternative limits growth in rural areas and assigns no growth to resource lands. PSRC recognizes that increased pressure could occur in these areas. The discussion of impacts in the FEIS does address both the adjacency issue as well the potential for loss of these resources, particularly as a cumulative effect of growth. This is covered in chapters such as land use (5.2) and ecosystems (5.5). PSRC also has developed additional policies and mitigation measures to support the protection of these lands, as reflected in the Final EIS and the VISION document.



Appendix A

Analysis of Other Alternatives

O-003-005

The Growth Targets Extended and Smaller City Alternatives

- (1) Fail to address many issues raised during the scoping process,
- (2) Result in significantly greater adverse environmental impacts according to the DEIS,
- (3) Are inconsistent with the goals of The Cascade Agenda and
- (4) Do not reflect a VISION for the future of the Central Cascades consistent with improved quality of life.

The *Growth Targets Extended Alternative* would maintain current growth targets through the year 2040. Of greatest concern with this alternative is the projected residential growth that would occur in unincorporated urban growth areas and rural growth areas. Conversion of these areas at *currently planned densities* would result in continued environmental degradation, stress to regional transportation systems, and irreversible impact to the natural and historic character of the region and consequent negative impacts to the region's economy.

The *Smaller Cities Alternative* permits the most dispersed growth. This dispersed growth pattern will result in the largest increase overall development footprint adding a significant amount of growth to unincorporated growth areas and would increase development in rural areas. This alternative accommodates the projected population increase but does not address other public benefits such as conservation, transportation, and rural industries that rely on the maintenance of rural landscapes. Based on the analysis provided by the DEIS, the *Larger Cities Alternative* would result in a similar degree of overall impacts as the *Metropolitan Cities Alternative*. This alternative however, focuses the majority of growth in suburban cities. Growth in these areas is likely to exacerbate the region's transportation problems and unnecessarily spread growth across a greater area than all the other alternatives.

Appendix B

Consideration of Rural and Resource Lands

O-003-006

I. ADDITIONAL ANALYSIS NEEDED

By failing to address the impacts of the four growth alternatives on rural and resource zoned lands, the DEIS paints only a partial picture of the real impacts associated with the outcome of this important regional decision.

Given the projected population increase of 1.6 million over the next forty years and the finite supply of land across the region, minimizing land consumption through efficient development patterns must be a priority for the region. And, recognizing the inevitability that rural and resource lands will absorb a small but significant percentage of the population increase, **it is imperative that the final EIS provide sufficient analysis of different non-urban development patterns and associated impacts to the environment and economy.** For example, what are the impacts associated with developing current and zoned rural or resource lots compared to developing compact communities within the rural zone or adding density to nearby communities through transfer of development rights (TDR)?

If, however, the DEIS analysis is suggesting that no growth should occur in resource zones, then PSRC must provide an explicit commentary along with associated appropriate MPPs to implement this objective. Otherwise, development will continue to occur in farm and forest resource zoned lands. For example, "Ag Zoning" in Pierce and Snohomish Counties currently allows minimum lot sizes of 5 -10

- 3 -

O-003-005

Comment noted regarding your concerns pertaining to the alternatives.

O-003-006

PSRC does not agree that additional detailed analysis is necessary at this time to further identify potential impacts to rural and resource lands. None of the alternatives involve growth in resource lands, and the FEIS therefore addresses potential impacts as indirect or cumulative effects. However, PSRC agrees that preservation and conservation of these areas is important, and has included the measures suggested in your letter as potential mitigations in the Final EIS. Supporting policies for preserving resource and rural lands have also been included in the multicounty planning policies. VISION 2040 also includes an action to track and evaluate growth.



O-003-006 acres adjacent to rural zoned land of similar lot size. Parcels of this size are too small for most agricultural 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.

To reemphasize this point: *The working landscapes in the Central Cascades non-urban areas contribute significantly to the regional quality of life. Conversion of these lands is imminent and permanent. It is therefore imperative, that PSRC address this issue and provide sufficient analysis to disclose the real impacts associated with the development of non-urban areas across the region.*

O-003-007 II. MEASURE OF SIGNIFICANCE: AMOUNT OF LAND CONSUMED
 Over the next 100 years, the Central Cascade region must manage a finite land base to accommodate population growth, support essential ecological functions, sustain supplies of natural resources, provide recreational opportunities and maintain the cultural and historic heritage of the region.

The success of our efforts to manage growth and competing land use needs is not reflected in the percent of population accommodated inside versus outside the Growth Management line. Available land on which to accommodate competing land uses is the limiting factor for supporting the essential components of a healthy environment, strong economy and vital communities. The relevant metric for measuring the health of our region is the amount of land consumed and the rate of that consumption.

Current policies based on this metric mistakenly attempt to reduce density by zoning large lots in rural and resource land areas. However, large lots are a poor way to reduce costs, and while they have historically slowed growth the appetite for housing will overcome past trends. Large lot zoning encourages land consumption and causes a host of problems:

- 80 acre lots don't support forestry; 10 acre lots don't support farms
- Large lots will attract buyers – eventually we consume entire land base
- No bright line between Ag, Rural and Forest land – on the ground
- Development of existing and zoned lots degrades environment
- Fragmentation reduces future options

The Cascade Agenda argues that we must view our land base as a precious commodity, and that we should invest in innovative design and new technology that can offer options to:

- accommodate growth
- achieve permanent conservation
- address fairness concerns of landowners

O-003-007

All of the alternatives assume the same levels of development overall. None focus any growth to natural resource areas. Growth in rural areas is based on the definitions of the alternatives, which are then "painted" using existing land use designations. As such, the issue of consumption is inherently addressed in the definitions.



Appendix C

O-003-008

Transfer of Development Rights

The Cascade Agenda encourages a shift of potential development from resource lands to appropriate receiving areas. The Cascade Agenda approach recommends a strategy that incorporates a strong incentives program (such as market-based TDR programs) combined with innovative rural growth strategies (such as developing rural villages) and increased urban density.

TDR programs address both economic and environmental goals by:

- Shifting development onto areas suitable for additional development
- Fairly compensating land owners for the real estate value of their property without forcing them to convert.
- Providing incentives that make development feasible

Effective TDR programs can address multiple interests simultaneously. For example, some smaller cities have expressed concern that under the Metropolitan or Larger Cities Alternatives, they would face unacceptable growth limitations. To address this concern while providing additional public benefits, the smaller cities could be allowed to grow, contingent on acceptance of transfers of development rights from priority rural and resource lands.

In addition, The Cascade Agenda recommends the use of Rural Villages¹ as suitable receiving sites for TDR programs. Rural Villages serve to minimize land consumption by consolidating existing zoned potential for rural development outside the urban area.

The Cascade Agenda strategy is proactive in that it provides solutions to problems associated with the anticipated population increase. As stated before, minimizing the consumption of the non-urban land base is seminally important to the overall health of the economy, environment and cultural heritage of the region. If PSRC and VISION 2020 +20 fail to address these issues, the remaining rural landscape will be consumed in the next 15 to 20 years by five-acre, ten-acre and smaller lot development. This outcome would have significant, permanent and negative consequences from which the region could not recover.

¹ Rural Villages are compact rural developments composed of 50 to 200 housing units that utilize low impact development standards and minimize overall footprint and impervious surfaces.

O-003-008

Thank you for the background information regarding TDR. Note that VISION 2040 does not contain policies related to Rural Villages.



Appendix D

Cascade Agenda Detailed Comments on PSRC Draft Environmental Impact Statement

O-003-009 Section 2: Environmental Baseline

Page 2.14: Proposed REVISED DESCRIPTION: Add to end: *The Cascade Agenda program calls for voluntary, market-based strategies for conserving the region's landscapes. It emphasizes the need to create attractive compact communities, and to grow these communities with the use of transfer of development rights (TDR) that simultaneously conserve resource and natural lands.*

O-003-010 Page 2.18: Proposed correction of column by adding bullets for following categories (rows): *Invasive species, Loss of prairie and oak savannahs, Loss of prime agricultural land, Quality of forest habitat, Terrestrial species sustainability, Loss of riparian vegetation, Modified shorelines, Effect of landscape transformation on ecological process, Ecological connectivity, Climate change.*

O-003-011 Page 2.20: The VISION 2020 Update should explicitly connect growth management targets with landscape conservation and restoration. It would be highly desirable for the VISION 2020 Update to adopt an environmental framework, as a necessary condition for the success of most regional environmental efforts will be a coherent growth strategy that does not further degrade the landscape or work counter to independent environmental efforts. The PSRC should work with entities involved in environmental science and protection to explore the value of expanding the PSRC's regional "table" to incorporate environmental planning.

O-003-012 Page 2.21: The VISION 2020 Update should be organized around an environmental framework. The VISION should include measures that encompass the full continuum of urban/rural/resource land areas.

Page 2.23: Policies and Strategies should support best practices. Additional best practice tools that should be considered are identified in The Cascade Agenda report (www.cascadeagenda.com)

O-003-013 The Growth Alternatives and environmental baseline should acknowledge and incorporate known changes in local climate based on global warming projections. Ideally the update and MPPs should set the bar for our region to meet the objectives of the Kyoto Protocols.

Section 5.2: Land Use Planning

O-003-014 As stated in the EIS: "The VISION is the foundation for...protecting valuable rural and resource lands from inappropriate urban development and urban sprawl through compact regional growth." In addition to encouraging most growth in urban areas, this can be achieved by compact development outside urban areas. Compact development: (1) limits growth of impervious surfaces, (2) helps to concentrate traffic by requiring fewer feeder roads and, (3) encourages alternative transit.

Page 5.2.9: Long-Term Impacts: One way to lessen the impacts of all alternatives is through compact, clustered, rural development combined with use of a TDR process.

O-003-015 Page 5.2.14: The Growth Targets Extended Alternative, with its high percentage of rural lands growth, could impact the placement of the UGA boundary. The Cascade Agenda believes that adding pressure to the UGA boundary will encourage more conversion of rural and resource lands to urban development.

O-003-009

Your edit is included in the Final EIS.

O-003-010

Although PSRC appreciates the suggestion, the information shown is based on a previous issue paper that had already identified the linkages and the agencies involved. PSRC believes the existing figure remains effective for the purposes of conveying the overlapping interests and the diversity of environmental issues the region's players are tackling.

O-003-011

VISION 2040 addresses this issue and contains a regional environmental framework and environmental policies.

O-003-012

These edits have been incorporated in the Final EIS.

O-003-013

Your comments are noted. The multicounty planning policies have been drafted to include supporting activities and goals to minimize greenhouse gas emissions, and commits the region to state standards.

O-003-014

Your suggestion has been added to the list of potential mitigation measures for protecting rural lands in section 5.2 of the Final EIS.

O-003-015

Your comment is noted. The DEIS also noted that the Growth Targets Extended alternative could place more pressure on rural and resource lands.



- O-003-015** | So from this standpoint we prefer alternatives which minimize placing population and employment close to the UGA boundary.
- O-003-016** | Page 5.2.26: The growth pressure in rural areas under the Smaller Cities Alternative might be inconsistent with the Growth Management Act and to policies and programs in some county comprehensive plans. The pressure on rural lands will potentially re-designate these lands to urban. Growth on Natural Resource Land "could likely lead to annexations, incorporations and re-designations." Cascade Agenda does not support the Smaller Cities Alternative because it would result in impacts to Rural Land through increased annexations, incorporations and re-designations.
- O-003-017** | Page 5.2.30: Potential Mitigation Measures: Adequate consideration has not been given to creation and stewardship of public parks. The Metropolitan Cities and Larger Cities alternatives will require significant parkland acquisition and high standard of stewardship to mitigate the impacts of urbanization on the population.
- O-003-018** | Page 5.2.31: Strategies for Rural Lands: We support the proposed reference to clustered growth, "increasing development densities or clustering to help reduce the conversion of rural land". This may also be effective for reducing the loss of resource land. In addition, this could create more centralized areas of employment to reduce longer-distance commuting and potentially make more jobs accessible by transit. TDR should be considered as a mechanism for facilitating clustering and the formation of Rural Villages – this allows development potential to be moved across property boundaries providing more opportunities for transfers and greater conservation benefits.
- Strategies for Resource Lands and Critical Areas: We also support the concept that "increasing the use of innovative programs for preserving certain lands, including prime agricultural land or critical areas, through efforts such as the Transfer of Development Rights programs or stewardship incentives, to help provide economic benefit to land owners."
- Section 5.3: Transportation
- O-003-019** | Page 5.3.15: Growth Targets Extended Alternative: Significant increases in travel distance and time for all trips, and delays on freeways and arterial streets will decrease the quality of life for residents of the Puget Sound region. A lack of accessible share by transit will detract from the continued development of the vibrant, vital urban centers that are already in existence.
- Page 5.3.19: Smaller Cities Alternative: Population and employment increases in rural and unincorporated urban growth areas will necessitate the development of more roads and impervious surfaces, decreasing open space and vital habitat for endangered species. Highest vehicle miles traveled on freeways and arterials, and the limited environmentally-friendly transportation options due to dispersed development, will increase pollutants, impacting air quality and potentially increasing the effects of global warming.
- Page 5.3.18: Larger Cities Alternative: This alternative will place additional stress on the environment by increasing the development footprint and expanding acres impervious surface.
- Page 5.3.17: Metropolitan Cities Alternative: Average trip distance and time for all trips is decreased in comparison to the 2000 baseline. The increase in accessibility of activities by transit and fewer delay hours will encourage a greater percentage of the population to take advantage of public transportation options while decreasing single-occupant trips. The focused development of land will provide a greater percentage of open, rural and resource lands to remain, maintaining the uniqueness of the region.

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O-003-016

Your opposition to the Smaller Cities Alternative is noted.

O-003-017

The need for additional parks and recreation resources was discussed in Section 5.8, which also discussed mitigation.

O-003-018

Your suggestion is noted. As previously stated in response to your comment above, TDR concepts are included as potential strategies in the Final EIS and provisions are included in VISION 2040 as well.

O-003-019

Thank you for identifying the key transportation findings you consider important for weighing the alternatives.



- O-003-019** Metropolitan Cities is the Alternative most in line with the implementation of The Cascade Agenda and supports the increased accessibility share of public transportation. This alternative does the most to ensure the quality of life of the region's residents by providing diverse transportation options, limiting delays, and decreasing trip distance and time for commuters.
- Section 5.5: Ecosystems
- O-003-020** Page 5.5.4: Invasive Species: English Ivy should be discussed and identified as a serious threat to forested parks, rural forests, working timberlands and low elevation wild forests.
- O-003-021** Page 5.5.11: Policies and Regulations: Additional incentives, market-based pathways and alternative outcome-based regulatory pathways for achieving conservation objectives above and beyond current permitting thresholds.
- O-003-022** Page 5.5.15: Metropolitan Cities Alternative: This Alternative is most coherent with the objectives of The Cascade Agenda while The Larger Cities Alternative is the next most supportive.
- Page 5.5.16: Cumulative Effects: The Metropolitan Cities and Larger Cities Alternatives are likely to be more conducive to supporting restoration efforts.
- Page 5.5.17: Potential Mitigation Measures: TDR, incentives and other market-based techniques to ensure land is permanently conserved. Metropolitan Cities and Larger Cities are most likely to provide economic context to make The Cascade Agenda strategies viable.
- Section 5.7: Public Services and Utilities
- O-003-023** We are concerned that this EIS section and table session were short on specifics. The GMA requires meaningful and specific capital facilities planning. Each of the alternatives will require significant build out and upgrading of public services. As presented in the Draft EIS, the expected impacts of the Metropolitan Cities alternative include the potential to require expansion of services in metro cities and core cities beyond what is already anticipated. Therefore the additional costs of this alternative for these metropolitan cities will be significant and possibly viewed as unfunded mandates. These potential costs should be analyzed and explicitly discussed.
- The Cascade Agenda, addresses this by encouraging priority for infrastructure investments to be given to cities with active TDR programs to accept density from rural and resource lands.
- O-003-024** Section 6: Environmental Justice Discussion
- CLC, its partners and the supporters of The Cascade Agenda appreciate the attention PSRC is giving to environmental justice in the DEIS. As the population continues to grow, the importance of considering equity issues will only increase over the next forty years. Minority and low-income communities were under represented at the DEIS review kick off and corresponding discussions on May 23rd. It is important that PSRC provide the opportunities as described in Section 6.3 of the DEIS.
- The value of a public input process and the legitimacy of the outcome depend on the capacity of the process to obtain and utilize input from a representative cross section of the community. This is especially true for addressing environmental justice issues. We'd be happy to suggest leaders in the

O-003-020

English ivy is included in the discussion of invasive species.

O-003-021

Market-based incentives are now included as a potential mitigation measure.

O-003-022

TDR and other incentives are now noted as potential mitigation measures.

O-003-023

The Supplement Draft EIS and the Final EIS included additional discussion of how the VISION update responds to and supports the requirements of the Growth Management Act, both at the regional and at the county and local levels. This includes the development of multicounty planning policies, as well as the VISION itself, and the identification of a Preferred Growth Alternative.

PSRC recognizes that GMA requires detailed planning of capital facilities for comprehensive planning. However, the VISION 2040 document is not a comprehensive plan such as would be prepared by one of the four counties or any of the cities within the region. Rather, the VISION and the alternatives it contains form a growth strategy that establishes broad patterns of focused growth for the region, and provides the underlying goals and policies to help guide the work of the counties and cities as they continue to plan under the requirements of GMA. Subsequent local planning to update plans to address VISION 2040 is the more appropriate venue for this work.



O-003-024 non-profit arena who can help make the connection to communities of color around environmental justice issues.

vii. Section 7: Multicounty Planning Policies

The following policy recommendations reflect the GMPB call to develop MPPs with a regional environmental framework.

Appendix E

O-003-025 Transfer of Development Right (TDR) Programs and Policies

Establish Transfer of Development (TDR) programs that facilitate the expansion of a sustainable, robust region-wide TDR market.

Develop TDR Programs that:

- Provide mechanisms to move the development rights off priority natural areas, working farms and working forest lands onto those more suitable for development.
- Establish criteria for appropriate sending and receiving sites.
- Identify specific areas to receive development transfers.
- Set TDR ratios and other incentives to ensure appropriate market pricing for development rights. Pricing ratios must provide fair economic incentives for land owners and developers.
- Establish simple and stream-lined TDR transaction procedures for land owners and developers.

O-003-026 URBAN GROWTH AREAS

- Provide incentives and infrastructure support for cities that accept TDRs
- Ensure urban growth areas are large enough and provide for sufficient density to accommodate anticipated population growth.
- Focus development in urban centers and consolidate UGA developments away from locally important lands through TDR markets.
- To better manage character and pattern of large UGA areas and planned annexation areas, create within-area TDR programs to protect priority natural areas, parks and trails.

O-003-027 Support Compact Urban Centers

Establish vibrant and vital city centers and towns to accommodate population growth support a strong economy, and maximize quality of life for residents by:

- Providing housing options at a variety of prices
- Providing transportation choices that include safe convenient options for cyclists and pedestrians
- Expanding and acquiring new parks and trails
- Restoring and stewarding natural areas
- Encouraging technical strategies for building and infrastructure in urban areas that will offset existing impervious surface impacts

O-003-024

Environmental Justice is a responsibility of PSRC under its MPO designation. PSRC conducted an outreach project specifically under its EJ responsibilities. This is documented more fully in chapter 6 of the FEIS and also on PSRC's VISION 2020 update webpage under Publications. Also, VISION 2040 has a stronger focus on the region's people than was found in VISION 2020. Policies related to people are found in the multicounty planning policies chapter in the economy and development patterns sections. These policies focus on cultural and ethnic diversity, the region's poorer disadvantaged residents, and promoting growth in the region's economically distressed areas. Additionally, one of the key factors in the development of the Regional Growth Strategy was promoting a focused growth pattern, which better supported the needs of the region's changing demographics and allowed lower-income residents to have more mobility choices for accessing jobs from their homes.

O-003-025

These comments were considered in the VISION 2040 process to develop the multicounty planning policies. These ideas are also being considered as part of the Regional TDR project.

O-003-026

The suggestions were considered during the process to develop the MPPs and were not included.

O-003-027

VISION 2040 addresses centers and compact communities, describing many of the same features as those noted in your comments.



O-003-028

Elements of these concepts are contained in VISION 2040 policies and narrative regarding protecting rural and natural resource areas.

O-003-028 RURAL AREAS

Protect rural areas to maintain traditional NW lifestyle, environmental benefits, recreation opportunities and the overall character of the region defined by natural beauty and working landscapes while being fair to rural landowners.

Rural conservation and restoration

- Develop and maintain programs that:
 - Provide incentives for rural landowners to keep their land as working landscapes (forests and farms).
 - Minimize the development footprint in rural areas by implementing incentive-based strategies to consolidate rural development.
- Designate criteria for rural land to receive development rights as part of established TDR programs based on the following principles:
 - Receiving site designation should comply with predefined criteria that identify specific areas suitable for development.
 - Receiving site designation should maximize the consolidation of rural development through such strategies as clustering and the concept of rural villages (if authorized) both including associated conservation easements.
 - Consider encouraging growth of historic or existing rural communities through TDRs as a preferred alternative to buildout of existing and zoned rural or resource lots that are identified as priority sending areas.
- Create a robust receiving site market by providing incentives for cities and towns to accept and for developers to purchase TDRs. TDR programs should designate priority rural conservation and resource lands as sending sites, and provide fair compensation to land owners for removing development potential and conserving.
- Encourage plans to address the impacts of even modest development in resource zones
- Protect priority natural areas and resource lands with conservation easements.
- Provide incentives and support investment in stewardship programs that encourage collaboration with farmers and forest operators to restore and manage ecosystem functions on their priorities.
- Maintain existing public recreation lands and add local or regional priority lands.
- Maintain and coordinate public investment to support land acquisitions that protect priority natural areas, recreation land, resource land, or locations of regional or local significance.
- Ensure adequate resources allocated for long term monitoring and enforcement of conservation easements.

**Submitted Comments on PSRC Vision 2020 Update Draft EIS
from John Niles, Technical Chair
Coalition for Effective Transportation Alternatives,
Senior Fellow, Cascadia Center of Discovery Institute,
& President, Global Telematics
July 31, 2006**

O-004-001

Thanks to the PSRC for issuing a very substantive and educational document.

What it doesn't say is as interesting as what it does say!

A web page that I posted on the world wide web of the Internet at <http://www.bettertransport.info/pitt/transitmodeforecastdropping.htm> is submitted in its entirety as a comment.

O-004-002

According to my colleague Ed Risse, a consulting land use and transportation planner based in Warrenton, Virginia, who reviewed part of the PSRC DEIS document at my request, "none of the four PSRC alternatives are quantified or related to minimum or maximum densities at the Alpha Community (or any other) scale. Using existing municipal boundaries in an attempt to articulate functional components of regional, sub-regional or community-scale settlement patterns is akin to trying to use a cubit-long piece of driftwood to measure a precision part for a high performance engine." I recommend that PSRC contact Mr. Risse to understand the emerging art and science of quantification of rational parameters applied via regional metrics. Without understanding and applying this methodology, PSRC is even more likely than indicated in the Draft EIS to fail to balance the travel demand of the regional settlement pattern with the capacity of the transport system.

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Finally, I request that the following clarifications and additions be made in the Final version of the EIS:

O-004-003

1. On pages 5.3.6 and 5.3.7, the description of the High Capacity Transit system assumed to be in place for the 2040 modeling is unclear. I believe that the HCT system for 2040 that is modeled includes the complete Sound Transit HCT build out as described in Destination.

O-004-001

Thank you for providing this background information.

O-004-002

Detailed decisions related to specific transportation districts, projects, and other infrastructure needs and their implementation are beyond the scope of the Vision 2040 project, which is focused on determining how and where growth might best occur in the region. While transportation is a critical issue, it must be balanced along with a wide range of environmental, economic, and public policy factors that must be considered in the planning process. However, subsequent transportation planning efforts such as a major update to Destination 2030 will be considering strategies for developing the multimodal transportation system improvements needed to support the long-range needs of future growth.

O-004-003

Your understanding of the transportation projects is correct. The amount of text devoted to this one mode, for this one EIS analysis chapter, is an appropriate level of detail for supporting the level of analysis and was therefore not increased. Note that in the update of Destination 2030, an opportunity exists for more detailed discussion and analysis of HCT investments and performance.

O-004-003	2030. Whatever is the assumption for the 2040 modeled transit system in this DEIS should be spelled out very clearly since it is a keystone regional strategy. Page 5.3.7 reads like an advertisement (or apology) for what Sound Transit is accomplishing under the Sound Move program voted in 1996. What's more pertinent on this page is a clear description of the HCT system that is the basis of the 2040 forecasts on which the Transportation outcomes in the document depend. Letting only lines on a map speak to this point is insufficient.
O-004-004	2. In Section 5.3.2, Accessibility is defined as "percent of regional employment within 10-minute walk, 20-minute bicycle ride, or 30-minute transit ride." The reasons for the particular "minute" numbers in this definition should be explained in detail. An explanation of why the Accessibility number comes out to be in the 1 to 2 percent range in the present day and similarly forecast over the next three decades should be provided. People I have talked to find this number shockingly low, so please explain why it comes out where it does, a key bit of regional education needed.
O-004-005	3. In Figure 5.3.4, SUMMARY COMPARISON OF ALL 2040 ALTERNATIVES, the carpool (vanpool?) mode split is not shown. It should be. And since the share forecast for 2040 is dramatically lower than the forecast issued for Destination 2030, there should be an explanation. Something is going on in PSRC's revised understanding of the future that needs to be clarified.
O-004-006	4. In Section 5.3.4, Potential Mitigation Measures, bullet three, the statement "However, the cost and efficiency of additional service would have financial implications for regional transit agencies." should be clarified with additional text and illustrative examples.
O-004-007	5. Under Section 5.3.5, Significant Unavoidable Adverse Impacts: A statement should be made that "no significant unavoidable adverse impacts were found for the Metropolitan Cities Alternative and the Larger Cities Alternative" if that remains the case in the Final document.
O-004-008	6. Also under Section 5.3.5, the last sentence in the first paragraph contains the phrase "highest performance results" which verbally carries with it the incorrect implication that "highest performance" is equivalent to "most desirable" despite the examples provided. I suggest using the words "most adverse" instead of "highest."
O-004-009	7. On page 16 in the Appendix "Issue Paper on Transportation" dated January 12, 2006, the statement is made, "Closing the gap between increases in service hours and passenger trips will demand more efficient delivery of transit service over the long-term." This statement should be put into the main text of the Transportation Section of the DEIS as a cautionary note, with a complete explanation of what this means. See point 4 above. How the trend noted in the Issue Paper was carried into the assumptions of the 2040 modeling should be explained.
O-004-010	8. At the top of page 23 in the Appendix "Issue Paper on Transportation" dated January 12, 2006, the statement is made, "On average, a trip that now takes 30 minutes during the afternoon peak period will increase to nearly 90 minutes in 2025." This forecast three-fold increase in certain peak period travel times should be more thoroughly explained in the Transportation Section of the main document. The coverage there should include a qualitative discussion by PSRC staff on the implications of this forecast for the likely resulting movement patterns in the PSRC region, and the changes in development patterns

John Niles Comments on PSRC Vision 2020 Update DEIS, Page 2

O-004-004

The definition for this indicator has been updated in the FEIS. There are numerous factors affecting this number, including location of a home within the specified proximity to employment (recognizing limitations in accessibility from site to site by the particular mode), and base population and employment figures, which are larger than the growth distributions and which remain unchanged. These factors can have a limiting effect on the resulting performance result with the base tending to normalize the results.

O-004-005

Please see the complete set of transportation performance results in FEIS Appendix I-D.

O-004-006

The FEIS has additional explanation for this bullet.

O-004-007

All of the alternatives have the potential for significant unavoidable adverse impacts, depending on how they are ultimately implemented through local plans and countywide policies. Therefore, the statement has not been added.

O-004-008

The discussion in the FEIS has been revised.

O-004-009

The FEIS and the Issue Papers served slightly different purposes—one analyzed alternatives based on SEPA categories and one explored an issue with a goal towards developing the VISION. Therefore, this statement has not been added.

- O-004-010** | that will likely occur in reaction if this forecast trend continues. This forecast should also be placed in historical context of past forecasts of growing congestion by the Puget Sound Regional MPO.
- O-004-011** | 9. At some point in the narrative of the Transportation chapter, PSRC staff should go on record on the prospects for the region adopting a land use and transportation policies that yield better results than the modeled forecast results shown in Figure 5-3-4: SUMMARY COMPARISON OF ALL 2040 ALTERNATIVES. In other words, if PSRC staff are confident that the results shown in the Figure are likely the best that can be achieved under Destination 2030, that declaration should be very clearly made.
- O-004-012** | 10. In the map shown in FIGURE 5-12-1: VISUAL RESOURCES IN THE CENTRAL PUGET SOUND REGION, the view from several bridges is indicated as noteworthy, but the view from the Alaskan Way Viaduct (which is still on the table as a built possibility for 2040) is not noted. The view from the open-air Viaduct is in the opinion of myself and others more noteworthy than the view from the bridges that are noted on the map, and a potential mitigation if the more desirable waterfront tunnel does not come to pass. This discrepancy on the map should be corrected or explained.
- O-004-013** | 11. The description of intelligent transportation and intelligent vehicle technology likely to be deployed over the next 35 years is shockingly sparse and inadequate in the transportation chapter. Contact me for references. These technologies are likely to change the character of congested vehicle flows, or at least that's arguable. Please comment on how modeled results would be affected by higher flow rates on freeways for cars and transit.

John Niles
Global Telematics
4005 20th Avenue West, Suite 111
Seattle, Washington 98199

O-004-010

See previous response regarding the relationship between the FEIS and the Issue Papers. Also, note that the PSRC Boards took Actions to Proceed on the Issue Papers, which finalize them and so they are not being updated.

O-004-011

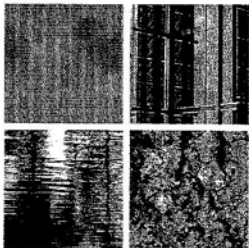
The results in the table are not meant to imply "the best that can be achieved." Rather, they estimate the effects of each of the growth distribution alternative. Note that the Destination 2030 update provides an opportunity to continue to address these issues in a project that is more focused on transportation, and one in which the transportation investments can be reconsidered.

O-004-012

Comment noted. The list is representative and not intended to be exhaustive. The decisions regarding the Alaskan Way Viaduct are being decided through a separate process.

O-004-013

The transportation results assume the flow rates and other ITS elements that are in the adopted metropolitan transportation plan, Destination 2030. As noted in other previous responses, the level of detail on transportation will be greater in the Destination 2030 update.



VISION 2020 Update Draft Environmental Impact Statement

Comment Form

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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.
- By sending an email to vision2020update@psrc.org.
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The comments that you make will become part of the public record for this project. Your thoughts will help decision makers develop a preferred alternative. 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/datapubs/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 Margaret Kitchell

ORGANIZATION Feet First

ADDRESS 1402 Third Ave Suite 1121

CITY Seattle STATE WA ZIP 98101

E-MAIL margaret@feetfirst.info

☒ Check here if you would like to be added to the project mailing list.



YOUR INPUT IS NEEDED

The region has some tough choices to make to get from four broad alternatives to a single vision that reflects our shared values and aspirations. Participants in the review process are asked to comment on the growth alternative that appears to best meet the needs of the region. You are welcome to mix and match portions of the alternatives that have been included in the Draft Environmental Impact Statement to form a hybrid that represents an alternative you prefer.

PLEASE CONSIDER COMMENTING ON THE FOLLOWING SUBJECT AREAS:

1. The environmental baseline (see Chapter 2)
2. The growth distribution alternatives — including ideas for a Preferred Growth Alternative (see Chapter 4)
4. Environmental justice (see Chapter 6)
3. Discussion of multicounty planning policies (see Chapter 7)

COMMENTS:

O-005-001

In regards to transportation — I would like to see more information on health impacts — both effects on physical activity + traffic crashes with different scenarios. I believe they might be consistent with air quality effects. So far I prefer Mer Cities + large cities alternatives because of air quality impacts, and higher % of walking or biking trips, ↓ global warming emissions, ↓ energy use.

PLEASE ADDRESS COMMENTS TO:

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



O-005-001

Thank you for your comment and for identifying your preference for the more concentrated growth alternatives. The Preferred Alternative provides similar benefits to those you identify. The Draft EIS and the Final EIS both address the benefits of a healthy lifestyle, which can be supported by public infrastructure and land use decisions that promote walking and bicycling. This discussion appears in section 5.9, Environmental Health, and in Chapter 6, Environmental Justice. In response to comments on the Draft EIS, the Final EIS also identifies additional mitigation measures for developing an environment to support healthy lifestyles. The multicounty planning policies also include similar measures.



July 31, 2006

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

Dear Mr. Abbott:

Thank you very much for the opportunity to comment on the Vision 2020 Update. We appreciate all of the effort that has gone into this important update process, and we applaud the overall vision of planning for future growth at the regional scale. Futurewise is a statewide citizen's group that works to protect working farms and forests for this and future generations, while making cities and towns great places to live. We have citizens across the state, as well as in King, Pierce, Kitsap and Snohomish Counties.

We overall support components of the alternatives that focus growth into existing urban areas, such as the Metropolitan Cities Alternative and Large Cities Alternative. Focusing growth into existing urban areas will minimize environmental impacts, use resources wisely and co-locate new employment and housing growth. We feel that focusing growth into existing urban areas is very important for many reasons, and a few are listed below.

- Focusing growth into existing urban areas will provide for a reduction of growth in the rural areas and resource lands and protect the valuable diversity of land uses and resources in our region.
- A dense development pattern will likely have the least impact on the overall environment, including lower emissions, preservation of habitat and resource lands, lower potential impact to water quality and more focus on restoring and preserving urban ecosystems.
- Planning for housing and employment to be located near each other will reduce commute times, and resources and infrastructure will be used more efficiently.
- High capacity transit systems are efficient and work well in dense areas. Our region desperately needs high capacity transit that links housing and employment centers, and if growth is focused in the urban areas it will make this system very efficient and cost-effective. On the contrary, if less focused growth patterns occur, our congestion problems will continue to increase and negatively affect our region.
- A focused growth pattern will likely provide for production of the most affordable housing and resources to assist lower income residents.

1617 Boulton Avenue Suite 200 Seattle, WA 98122 www.futurewise.org phone 206 343 0661 fax 206 709 8218

O-006-001

Thank you for identifying your preference among the alternatives. The Preferred Growth Alternative shared many of the benefits of the other focused growth alternatives, such as those noted in your comments.

O-006-001

O-006-002

As you move forward in your update process, we urge you to include a robust Transfer of Development Rights (TDR) program. A TDR program focused on transferring capacity from the rural resource areas to existing cities and towns will help promote regional goals of focusing growth in urban areas and providing alternatives to rural land owners to help protect rural resources and the rural lifestyle.

O-006-003

Additionally, as the update process progresses and an alternative or hybrid alternative is selected, we urge you to make sure that cities are willing to help promote urban growth in their areas.

Thank you again for your hard work on this update, and we appreciate the opportunity to comment.

Sincerely,

Sydney McComas
Urban Policy Director

O-006-002

VISION 2040 policies discuss TDRs, and PSRC is participating in the regional TDR program established by the legislature in 2007.

O-006-003

Comment noted.



July 18, 2006

Norman Abbott
State Environment Policy Act Responsible Official
Puget Sound Regional Council
1011 Western Ave, Suite 500
Seattle, WA 98104

Dear Mr. Abbott:

ADHS Housing of Washington
Archdiocese Housing Authority
Arquette Projects, Inc.
Capitol Hill Housing
Improvement Program
Central Area Development Association
Common Ground
Community Development Center
Columbia Heights
Development Authority
Downside Action to Stop Hoarding
Downside Emergency Service Center
Earthquake Housing Assistance
Housing for Homeless of
Seattle/King County
HousingLink
Historical Community Land Trust
Housing Resources Group
Urban Community Housing
Initiative
Low Income Housing Institute
Lutheran Alliance to
Create Housing
Mount Baker Housing Association
Multi-Sector Center
Pathways Services
Pioneer Human Services
Plymouth Housing Group
St. Andrew's Housing Group
SCDHSA
Seattle Emergency Housing
Service
Southwest Urban
Development
YWCA

The Housing Development Consortium would like to express our appreciation for the inclusion of housing issues in the Vision 2020 Update Draft Environmental Impact Statement. We are pleased to learn the Puget Sound Regional Council (PSRC) recognizes the significance of the housing affordability crisis that is encroaching on the Puget Sound region, the ramifications of which will have long lasting effects on both our region's growth as well as its economic prosperity. This is an issue that our region can no longer afford to ignore. The integration of housing in the PSRC's long range planning processes is a critical and necessary step in addressing the affordability crisis our region now faces.

The Housing Development Consortium (HDC) is the region's oldest and most experienced trade association of low and moderate income housing developers. HDC helped establish similar consortia in Pierce and Snohomish counties and we work closely with our colleagues throughout the Puget Sound region. As such, HDC is uniquely qualified to comment on the discussion of housing in the Vision 2020 Update DEIS. We greatly appreciate the opportunity to comment and provide feedback.

Housing affordability has a direct impact on a region's growth and economic prosperity. Without the availability of an affordable place to call home, the region cannot attract jobs, cannot preserve diversity, cannot provide high quality education to our children, adequate healthcare to our seniors, or the necessary services to our citizens with special needs. The availability of affordable housing also directly impacts other prominent regional concerns, namely transportation and land use. By placing the same level of importance on housing as is currently given to transportation and environmental impacts, we will be one step closer to achieving responsible growth and long term economic prosperity throughout the Puget Sound region.

After its review of the Vision 2020 Update DEIS, HDC has identified three points of critical importance:

I. The PSRC must take a leadership role in setting and monitoring regional housing targets.

At present, design and implementation of regional housing goals is inadequate. The PSRC must extend its leadership, oversight, and guidance capacities to the setting, implementation and monitoring of regional housing goals and local housing targets.

Affording Opportunity

811 First Avenue, Suite 408 Seattle, Washington 98104

206.682.9541 Fax 206.623.4669 www.housingconsortium.org

O-007-001

Thank you for providing additional information about your organization and its efforts to support affordable housing.

O-007-002

Concur.

O-007-003

VISION 2040 has addressed this issue, with a stand-alone housing policy chapter, as well as implementation actions that call for the type of housing program and leadership suggested in your comments.

O-007-001

O-007-002

O-007-003

- O-007-004** **II. Each growth alternative must include its effect on housing costs and propose strategies to mitigate housing cost increases.**
All four alternatives presented in the DEIS state that they increase the cost of housing – but all lack a discussion of strategies intended to mitigate this negative impact. Each growth alternative must specifically address its impact on housing cost and discuss mitigation strategies. While we recognize that housing costs are fluid and difficult to predict in the long term, the general pressures any growth alternative would place on housing are quantifiable. Modeling processes and analysis can predict the types of housing developments best suited to meet the growth parameters. The final growth alternative chosen must be evaluated by the plan's effects on the pressure it would place on the availability of housing and must propose strategies to mitigate increasing costs and support affordability, including calling out the need for housing subsidies.
- O-007-005** **III. The final growth alternative must implement the policies, actions, and monitoring provisions outlined in the Issue Paper on Housing as part of any long range growth strategy for the Puget Sound region.**
The Issue Paper on Housing provides a clear analysis of the current status of housing in the Puget Sound region, recognizing that "providing adequate housing for all segments of the region's population" is a critical issue. The final growth alternative selected must recognize that availability of affordable housing is a critical component of well planned growth and should incorporate the policy recommendations, implementation actions and monitoring provisions put forth in the Issue Paper on Housing.

HDC applauds the discussion of the affordable housing crisis in the Issue Paper on Housing. Implementation of the housing policies outlined in Issue Paper is a critical component of responsible long term growth in the Puget Sound region. We submit the following recommendations and comments meant to further strengthen the policy, action and monitoring recommendations currently included in the Issue Paper:
- O-007-006** **1) Definitions**
In order to appropriately plan for the anticipated growth of our region, the need for affordable housing, regional housing goals, local housing targets and strategies to achieve those goals and targets must be clearly defined and easily understood. HDC would like to see the following concepts be clearly defined in the Issue Paper on Housing and in changes to the DEIS:
- **Affordability:** While market rate housing is currently beyond the reach of many workers earning the areas median income, *affordable housing* is most commonly priced to serve those earning 80 percent and below of a jurisdiction's median income. For example, in King County, where median home prices have increased nearly 20 percent in the first six months of 2006, a median priced home now costs \$427,950. A family earning 80 percent of the county's median income (\$58,000) can only afford \$249,000. (For additional definitions of income and affordability please see the attached chart.) The majority of rental units produced by affordable housing developers target income at 50 percent of median (\$36,000) and below. Any definition of affordable housing must be put in the context of the income level the housing serves.
 - **Need:** The need for affordable housing should be clearly defined. While the housing industry has yet to forecast the need for housing as far out as 2040, HDC has calculated that King County alone must produce 155,000 new units of affordable housing in the next 15 years to meet the need anticipated in 2020. The King County Committee to End Homelessness has identified a need for 9500 units by 2015 to serve the homeless in King County. If current trends are any indication of future population growth in our region, this need is only likely to continually increase. We encourage that any future EIS of growth alternatives right-size all housing goals and targets to a clearly identified need spanning the continuum of housing.
- O-007-007** • **Goals:** Clear and precise housing goals should be included in each growth alternative currently presented in the DEIS. Clearly defined goals must mirror the priorities established by local comprehensive plans and follow guidelines under the Growth Management Act but housing goals should also be right sized to fit the need for affordable housing.

O-007-004

The DEIS did not attempt to speculate on potential changes to housing costs by alternative, but does note that the cost of housing could increase under all alternatives, and that affordability is a major concern.

Further, 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.

O-007-005

VISION 2040 addresses housing affordability. The VISION contains a stand-alone housing policy section, as well as housing-related actions. While they do not set affordable housing targets for local jurisdictions, they do speak to creating a regional housing action plan, which will likely address many of the issues raised in your comment.

O-007-006

VISION 2040 does contain a discussion of housing needs as well as definitions. The FEIS alternatives discuss housing, but the differences among the alternatives in terms of housing needs and supply is appropriately addressed given the variability of how the alternatives might be implemented.

O-007-007

VISION 2040 has addressed this issue with goals and policies related to housing.

O-007-007	<ul style="list-style-type: none"> Targets: Housing targets should reflect regional goals around growth. Targets must be clear and also right sized to meet the need for homeless housing, affordable rental housing, and homeownership.
O-007-008	<ul style="list-style-type: none"> Measures: HDC encourages the clear use of income levels, unit type, and need when creating measures of success in meeting housing targets.
O-007-009	<p>2) Housing Goals Housing goals established in the Vision 2020 Update should accurately reflect the variety of needs represented in our communities, from homeless and special needs populations, to populations with extremely low income, to those who need workforce housing, to homeownership.</p>
O-007-010	<p>3) Strategies, Policies and Actions to achieve Housing Goals There are numerous strategies, policies and actions that can be employed on state, regional, and local levels to address the needs for affordable housing. HDC recommends the Vision 2020 Update discuss the following strategies in-depth:</p> <ul style="list-style-type: none"> Regional fair share, establishing regional responsibility for the production and sustainability of affordable housing Mixed Use Development Land Use and Density (zoning, density bonus for the inclusion of affordable housing) Local financial incentives (fee exemptions, density bonuses, tax credits) State, regional and local subsidy and funding commitments Institutional financial mechanisms (new trust funds, land banking, land trusts) <p>4) Technical Assistance HDC strongly supports the creation of a review process of housing targets in local comprehensive plans and encourages the creation of a toolkit or other guidance to assist local jurisdictions in meeting their housing targets.</p> <p>5) Public Education Addressing the housing affordability crisis will require public and political will. The availability of affordable housing must be linked to regional decisions about growth. In order for housing to be successfully integrated into the region's decision making processes, HDC strongly encourages that the Vision 2020 Update include the strategy of public education about the connection between housing affordability, responsible growth, and economic vitality. Building broad coalitions will allow us to lift awareness of the housing affordability crisis to the level of other critical needs (transportation, education) in our region.</p>
O-007-011	<p>Next Steps HDC strongly encourages the PSRC to continue working with stakeholders in the affordable housing industry to further refine the discussion of housing in all of our region's long range planning tools. HDC and its members are eager to contribute to the creation of housing toolkits to be used by local jurisdictions when housing goals and targets are being determined. HDC is also eager and willing to assist in the creation of guidelines for the advancement and monitoring of housing goals.</p> <p>As we are all stakeholders in the growth of our region, and we are all responsible for ensuring that our communities have adequate safe, decent, and affordable places to live. Without the availability of the necessary amount of affordable housing to accommodate the in-migration of 1.7 million people over the next twenty years, the region will not be prepared to adequately support that growth. As the Vision 2020</p>

O-007-008

Comments noted, and these will be considered as new measures when PSRC moves forward with additional work on housing-related monitoring.

O-007-009

VISION 2040 has addressed this issue and contains a housing goal and housing policies that address many of the issues noted in your comment.

O-007-010

The FEIS has been updated to include some of your suggested mitigation measures. Note that a related set of mitigation measures is also found in chapter 5.2, which discusses land use. Also, see next response.

O-007-011

During 2007, PSRC worked with stakeholders through the Prosperity Partnerships to develop a housing working group that is seeking some legislative changes and other actions to promote affordable housing. PSRC continues this work in 2008.

0-007-011

Update is revised and finalized, the integration of housing into our regional planning process is critically important.

Thank you again for the opportunity to comment on the Vision 2020 Update. Regional planning that takes the needs of all of our citizens into consideration will ensure the Puget Sound region can be home to any and all who want to live, work and play here. We look forward to continued work with the PSRC on this issue.

Sincerely,

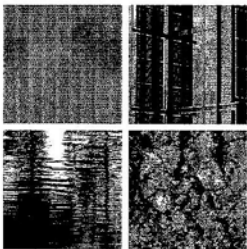


Carla Okigwe, Executive Director
Housing Development Consortium



Sarah Rick Lewontin, President
Housing Development Consortium

Cc Bob Drewel, PSRC
Carol Naito, PSRC



VISION 2020 Update 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 Julie Langabeer

ORGANIZATION League of Women Voters of WA

ADDRESS 200 Priest Point Dr. NW

CITY Tulalip STATE WA ZIP 98271

E-MAIL kjlanga@msn.com

I'm already on it.

☐ Check here if you would like to be added to the project mailing list.



YOUR INPUT IS NEEDED

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1. The environmental baseline (see *Chapter 2*)
2. The growth distribution alternatives — including ideas for a Preferred Growth Alternative (see *Chapter 4*)
4. Environmental justice (see *Chapter 6*)
3. Discussion of multicounty planning policies (see *Chapter 7*)

COMMENTS:

O-008-001

We favor the Metropolitan Cities Alternative, and, to a lesser degree, the Larger Cities Alternative. They are preferable to the Growth Targets Extended & the Smaller Cities alternatives because they would result in: Better air quality — Lower trip distances & times — Greater transit use — Lower risk of adverse impacts to natural habitats & to water quality — Less pressure for conversion of agricultural & forest lands — Less need for investments in new infrastructure.

O-008-002

Multicounty Planning Policies — We applaud the expanded emphasis on the value of protecting our natural environment. There should also be extensive guidance regarding public amenities which make a much denser urban environment a quality place to live and work. The issues of housing affordability and jobs-housing balance are major challenges which deserve major attention.

O-008-001

Comment noted regarding your preferences among the alternatives.

O-008-002

VISION 2040 contains policies that address these issues, including design, affordable housing, job/housing balance, and protecting the natural environment.



July 28, 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 and Draft Environmental Impact Statement.

Dear Mr. Abbott:

The Puget Sound Urban Design Team is an informal group of volunteer urban design professionals and interested citizens who are working to assist the Puget Sound Regional Council by contributing a design framework to the region's vision for the year 2040 and beyond. The following comments on the DEIS are the result of a collaborative effort to craft the basic elements of a design-based approach to regional planning in the Puget Sound.

Key Role and Vocabulary of Regional Design:

O-009-001 The concepts of design go beyond the aesthetic; design is what ties things together. Design assembles component parts into larger structures. This conceptual building is also appropriate as part of the regional planning process.

While we welcome the many references to urban design throughout the DEIS, particularly in its capacity to help mitigate what would otherwise be adverse impacts, it is pertinent to advance urban and regional design as a positive, transformational tool. Assertive, proactive initiatives will be necessary to use urban and regional design as means to create and drive a regional vision. We would like to see urban design factor more prominently in the development of the updated regional vision.

We would offer that design is needed as a tool to increase the region's resiliency to the major challenges facing the region such as ecological integrity, water and energy shortages, economic downturns, and even in the event of catastrophic change. For example, walkable communities can reduce energy consumption and dependence on motor vehicle transportation. The region will need to develop its capacity to bring design research and approaches to the processes of growth and change management.

Additionally, a regional planning process should definitely attempt to incorporate urban design as a front-end tool and should also recognize that a number of regionally significant systems exist which drive human settlement patterns beyond jurisdictional and political boundaries.

O-009-001

PSRC concurs on many points regarding the value of a systems-based approach to design. Note that VISION 2040 contains policies that address regional design that were developed, in part, by the Puget Sound Regional Design Team.

O-009-001 **Importance of a Systems Approach:**

When incorporating urban design at the regional scale, it is indeed important to recognize the extent to which regional-scale systems are likely to impact development and growth patterns. The impact of these systems can be integrated into the VISION 2020 Update process, either as a means of proposing a new alternative, as the criteria by which to choose a preferred alternative, or as an additional, holistic means for crafting and refining the preferred alternative.

To illustrate this point, the following is an initial sketch of the kinds of systems that could be considered as regionally significant.

Natural Open Space and Green Infrastructure Systems: These include eco-systems (such as shorelines, bodies of water, critical areas, steep slopes, greenbelts, estuaries, and forest ribbons) and geomorphological patterns (such as valleys and ridges, air-sheds, and watersheds). As a region, we must focus our efforts on maintaining ecological processes. Design solutions are needed which systematically contribute to the ecological health of the region.

Social Systems: These include the age and demographics within the projected population growth. (Who are the people that will be here in 2040? What kinds of incomes will they have? Where will the children and the schools be located? What kinds of attentions should be paid to the aging baby boomers?) They also include systems of neighborhoods and communities that often transcend jurisdictional lines. What are the ways in which these communities will identify themselves? What will make them unique or denote their special character in an era when development is starting to all look the same?

Human-Made Systems: These include infrastructure, transportation, transit, biking, pedestrian and other nonmotorized transportation, centers, corridors, the interfaces between urban and rural or between human settlement and natural systems. Conceptually, these are systems of human connectivity expressed via nodes, networks and edge. Spatial and temporal form, sequence, image and visibility are some of the design dimensions of these systems.

Market and Economic Systems: Market and economic trends operate on scales that go beyond the municipal, county, or even regional level. Where are people able to afford housing? How will the region be shaped by the rise and fall of a more global economy or of key industry sectors?

Subregions as Systems: As the DEIS points out, there are systems in the central Puget Sound area that transcend the boundaries of the region in addition to subregional systems. In turn, different considerations offer different definitions of subregions. Subregions, while sometimes defined on a geographic basis, could also be defined as related sets of market driven, physically constrained snapshots. For example, large employment centers such as Microsoft, Boeing-Everett, or First Hill certainly do not house employees equally about the region. Identifying the location and context of key sets of subregions (such as employment – housing pairings) can assist in addressing the reality that a complete, compact urban community can rarely be accomplished within one jurisdiction.

*Puget Sound Regional Design Team
July 28, 2006*

O-009-001

It is important to note that, as stated above, a design-based approach seeks to tie together components such as these systems listed here. It is also necessary to look for the connections between these systems and to incorporate these intersections into a systems approach.

The result of appropriate systems approach should include effective visual models that allow people to conceptualize a regional vision. Then, pieces of the entire vision can be implemented along jurisdictional lines as necessary. This vision will also serve to establish a necessary overarching regional identity.

O-009-002

Community and Regional Identity

Methods for establishing community identity: The following is an assemblage of several points made during the discussion addressing community and design identity. The comments seem to suggest at least three (not mutually exclusive) approaches to strengthening community and design identity within the region.

1) Identifiable communities with space in-between and served by a network of human made infrastructure and natural systems: As this region incorporates growth and development through the year 2040, we need to capitalize on increasingly mature development patterns. One approach to addressing this issue is a mature regional development pattern that includes well-established communities with space in-between. The communities would each have a unique identity and character and well-defined edges. Conceptually, community identity is particularly strengthened when these edges and community boundaries coincide with natural systems and green space. Connective infrastructure such as transportation corridors may have a more consistent, system wide design character. These communities are in turn supported by systems of infrastructure. Certainly, state growth management practices have helped establish improved development patterns, and these practices should be strengthened and improved in order to prevent a continuing homogenous matt of development from Seattle to Portland.

2) Importance of Regional Identity: On the other hand, there are common elements that tie the region together and give it a regional identity. Among these elements are:

- Shorelines
- Water bodies
- Ethnic diversity
- Topography and associated ecological processes
- Morphology of early settlement patterns within the landscape
- Weather and climate and associated architectural responses
- The sheer scale of the surrounding landscape
- Douglas Fir trees as sentinels of the Northwest
- Forested hillsides
- Views
- The scale and detail of the historic Northwest: For example the Douglas Fir is still a part of the landscape in Shoreline but has been almost eradicated in Seattle.
- (Potentially) infrastructure with a consistent design character.

*Puget Sound Regional Design Team
July 28, 2006*

O-009-002

VISION 2040 policies speak to the importance of design from a community, livability, and economic perspective. Also, the list of elements provided in this comment presented useful information in the development of the regional design strategy issue paper.

O-009-002 3) Opportunities for greater connection: While the first method for establishing community identity will work well for places that have an older, established core, in some instances, particularly where a two or more communities have organized around a corridor or other regional-scale feature, there is great opportunity to knit communities together, stitching together common identity through connectivity. For example, communities along the Green River share a common feature. Strengthening the river corridor connections between these communities, perhaps as an ecologically restored greensward, will increase the communities' livability, urban structure and collective identity. Other examples include the Overlake area that will require a coordinated effort by Bellevue and Redmond to achieve a more unified center and the Carnation Valley in which the rural backdrop is key to maintaining the character of the individual communities.

O-009-003 *Design Assistance*

It is equally important to celebrate successes. Showcasing the market success of recent good design practices within the region will serve as a powerful incentive for other communities to find and maintain their own identities. Providing other incentives, such as tax revenue sharing, access to a design database and pattern languages, or scale and systems appropriate design guidelines can provide design assistance to these communities

O-009-004 **Design Elements Specific to Regional Geographies**

Within PSRC's defined regional geographies, we think that the design elements listed below are important. The team worked within the framework of the identified "geographies" to facilitate coordination with current PSRC staff work. We would offer that there is value in also working with an approach that addresses and integrates the physical, ecological, social and economic systems (as described above) in your efforts to craft the preferred alternative and in implementing the updated growth management strategy.

The following are important to all geographies: (Note how closely they relate to the systems identified in the systems approach above.)

- Corridors (For example, stream and habitat corridors as well as movement corridors)
- Community Identity
- Transportation (Mobility and Accessibility)
- Walkability – Non-motorized transportation. This is the quality that people are looking for in their housing choices and a critical value in all geographies. We encourage that there be parity in the transportation investments to better serve bikes and pedestrians and not just motor vehicles.
- Ecology
- Development Strategy
- Open Space (Including issues of Food Security, Urban Agriculture, and access to healthy food). This item links the geographies in that a regional open space system would link communities within several different geographic categories and establishing an open space system will require cross-geography, regional strategies; possibly through urban –

*Puget Sound Regional Design Team
July 28, 2006*

O-009-003

VISION 2040 actions call for the development of "Best Practices Toolkits" to showcase successes.

O-009-004

These comments provided good information that was useful in the development of the MPPs and the Regional Growth Strategy. As VISION 2040 is implemented, these ideas, which are embodied in the Regional Design Strategy Informational Paper, will continue to add value. This paper is included as FEIS Appendix I-F.

rural relationships and partnerships such as the King county TDR program and the Cascade Agenda.

- Public access and ownership of shorelines and public lands
- Community development as integrated into major infrastructure projects. For example, if SR-520 is redeveloped as a community development process, the mitigation becomes front-end design.
- Sustainability – sustainable building practices, close integration between building development and ecological processes and a public infrastructure and capital web that is built for the long term.

Metropolitan Cities: These areas appear to be transforming themselves using a variety of strategies. Provision of housing and services for new growth and opportunities for infill are central to these cities.

- How can we provide sufficient open space for the increased populations, given land availability and cost? (Note: include streets as part of the overall open space system)
- Housing affordability
- Alternative transportation choices and strengthened multimodal transportation corridors
- The viability, preservation, and efficiency of industrial areas. Note: An innovative regional industrial strategy is needed based on industrial character, functional needs, infrastructure support, mobility, and port access.
- The continued greening of urban estuaries. What are successful models and strategies for urban estuaries?
- Unused school infrastructure is a resource. The design and character of schools in dense areas and centers needs some rethinking.
- Rural – Urban partnership: Transfer of development rights, etc

Core Suburban Cities: Some of these cities surrounding the metropolitan cities have strong identifying character and internal urban structure (including which were historically distinct towns such as Kirkland and Redmond), while it is our observation that many do not. Major transportation corridors run through many of these places, so that impacts of transportation projects are especially felt.

- Industrial areas are important here as well as in Metropolitan Cities. Need to find out what our needs are as a region, based on some comprehensive thinking on broader economic trends.
- These areas need to embrace urbanism, as there is no other option in terms of establishing identity and livability for them.
- Retool urban infrastructure to reduce auto dominance and increase walkability and livability.
- This geography needs an integrated strategy that crosses jurisdictional boundaries – examples: Redmond/Bellevue coordination in transforming the Overlake area and the opportunity for creating a more cohesive linear system of communities along the Green River. (Note: could the river corridor be the form-giving element of this larger area?)
- Tax revenue sharing might be a tool to achieve better integration of these municipalities.
- Ecosystem linkages and opportunities for connectivity (E.g.: shorelines)
- Find infrastructure and parcels for new schools

*Puget Sound Regional Design Team
July 28, 2006*

- Fine walkable transit corridors and major corridors
- Improving the limited arterial systems
- In this area, nodes along street corridors are “centers-type places” so that transforming these communities will require corridor redevelopment, which can be difficult because of the land use patterns and parcel sizes along older corridors.
- There needs to be better differentiation among communities based on unique character and identity.
- The communities could be integrated in a functional sense. (For example one community might emphasize employment while and adjacent one provide the housing choices. The key will be providing multimodal transportation between the two.

Larger Suburban Cities: A number of these are located on shorelines and include more amenities and identifiable communities than the Core Suburban Cities.

- Enhancement water and ecological systems will be especially important.
- There are ecosystem linkages and opportunities
- Find school sites and infrastructure
- Fine corridors, walking and transit
- Arterial systems are more limited so that local transportation systems are key
- Because these areas tend to be more dispersed, walkability strategies will be somewhat different.
- Enhancement of community identity based on unique character and identity is also an issue

Smaller Suburban Cities: Many of these cities are historic towns that are experiencing extensive growth and struggling to maintain livability within a rapidly changing context.

- Now is the opportunity to catch and integrate land use and transportation
- Appropriate scale and efficiencies should be developed. This geography may require different approaches to service provision and transportation,
- Edges and connections to surrounding rural areas will be critical.
- Protection of historic character within rapid growth is a critical design issue. Conservation of local history and associated development patterns can contribute to a design continuity between new and old.

Unincorporated Areas: These areas are often the least distinct and structured of all the geographies and are frequently among the most dysfunctional in terms of land use, community structure, transportation efficiency and visual qualities

- We need specific strategies for these areas
- Significant opportunities for new communities
- Thick green belts and boulevards of trees are a band-aid solution, but can help
- There is the need and opportunity to transform and structure these areas; perhaps through master planned communities addressing density, integration of uses, transit and character.
- New tools and strategies are needed for transit, community development, ecological restoration and landscape scale design intervention.

*Puget Sound Regional Design Team
July 28, 2006*

O-009-004

Rural Areas: Protection and ecological restoration are key in these areas.

- Integrate tribes into regional vision and design
- Keep schools located in centers
- Pursue Rural – Urban partnerships such as transfer of development rights, etc.
- We need to protect whole landscapes. Comprehensive approaches are needed; e.g. Cascade Agenda.

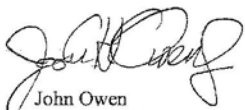
Summary Remarks


O-009-005

- In a regional planning process, design is an important front-end tool that goes beyond aesthetics and seeks to combine different systems.
- In using a systems approach, a design framework helps transcend jurisdictions and geographies to tie all components together. Furthermore, considering systems individually is not enough. The interactions among the systems should be considered as well, and design, by its integrative nature, can help with this.
- We did examine the regional geographies and noted different design challenges that each of these geographies might face; these components should eventually be dovetailed into an inter-jurisdictional systems approach.
- These findings indicate that a design framework can be integrated into the VISION 2020 Update process. Different members of this group feel that a systems approach and other suggestions above can be used in one of three different ways:
 1. As a method for proposing a new alternative
 2. As criteria by which to choose a preferred alternative
 3. As an additional holistic means to compose or refine the preferred alternative

This letter represents an initial response to the VISION 2020 Update DEIS based on a collaborative effort of members of the Puget Sound Urban Design Team. Over the coming months, we will continue to refine a regional design strategy and framework in tandem with PSRC's VISION 2020 Update process.

On behalf of the Puget Sound Urban Design Team,

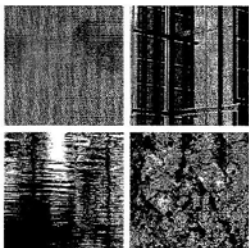

John Owen
Makers Architecture


Dennis Ryan
University of Washington

Puget Sound Regional Design Team
July 28, 2006

O-009-005

Comments noted. See previous responses. Also, the systems approach was included in other VISION 2040 policy sections beyond the regional design policies.



VISION 2020 Update Draft Environmental Impact Statement

Comment Form

What's your vision for the future of the central Puget Sound region? We want your input and need to hear from you!

The public comment period ends on Monday, July 31, 2006.

The public is encouraged to provide thoughts, ideas, and concerns on the Draft Environmental Impact Statement to help select a preferred growth alternative. Comments should 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 vision2020update@psrc.org.
- By attending any of PSRC's board or committee meetings. 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 develop a preferred alternative. 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/datapubs/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

Ted Choi Tam

ORGANIZATION

Seattle Chinese/Chinese American Chamber of Commerce

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☒ Check here if you would like to be added to the project mailing list.



YOUR INPUT IS NEEDED

The region has some tough choices to make to get from four broad alternatives to a single vision that reflects our shared values and aspirations. Participants in the review process are asked to comment on the growth alternative that appears to best meet the needs of the region. You are welcome to mix and match portions of the alternatives that have been included in the Draft Environmental Impact Statement to form a hybrid that represents an alternative you prefer.

PLEASE CONSIDER COMMENTING ON THE FOLLOWING SUBJECT AREAS:

1. The environmental baseline (see *Chapter 2*)
2. The growth distribution alternatives — including ideas for a Preferred Growth Alternative (see *Chapter 4*)
4. Environmental justice (see *Chapter 6*)
3. Discussion of multicounty planning policies (see *Chapter 7*)

COMMENTS:

O-010-001

TBD...
measurable, favor metro cities and
larger cities alternatives...

O-010-002

LEADERSHIP! from elected's required
to implement vision. —

PLEASE ADDRESS COMMENTS TO:

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



O-010-001

Thank you for stating your preference for a regional growth alternative.

O-010-002

Comment noted.

July 27, 2006

Seattle-King County Acting Food Policy Council
Washington State University
King County Extension Services
919 SW Grady Way, Suite 120
Renton, Washington 98055

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

Dear Mr. Abbott:

Thank you for the opportunity to comment on the Puget Sound Regional Council's Draft Environmental Impact Statement (DEIS) for VISION 2020 Plan Update. We write representing the Seattle-King County Acting Food Policy Council, and would like to suggest that food system concerns be more explicitly mentioned and addressed in the plan document. The term food system refers to the inter-related people and processes that bring food from farm to table to eventual disposal, often described generally as including five stages: production, processing, distribution, access, and disposal.

This is an exciting time for planning in the Puget Sound region, and for planning as a field generally. As evidenced by the inclusion in the DEIS of human health, particularly through communities that promote "active living," it is clear that PSRC is branching out into new and important substantive areas in its long-range planning. We suggest it needs to do even more. It needs to include food systems considerations in Preferred Alternative analysis and in multicounty planning policies.

Planners and policy makers have long addressed metropolitan-wide systems necessary or desirable for human society. Critical infrastructure such as water delivery, wastewater disposal, transportation, air quality, education, and housing are but a few of the more obvious topics that have been, or are being, examined in systemic fashion to better understand complex problems and subsequent solutions. Only in the last decade, though, has food really entered the analytical picture. This is surprising, since food is obviously a necessity for life, as are air, water, and shelter. It might be assumed that the market provides for food, and in many cases the U.S. food system provides abundant, cheap, food. However, there are many examples of market imperfections; environmental and social externalities abound in our current food system. The disproportionate impacts on poor and otherwise marginalized populations alone suggest that planners should be involved in food systems work, given the charges presented in the American Institute of Certified Planners Code of Ethics. PSRC has an opportunity to demonstrate foresight

O-011-001

Thank you for the additional information on the importance of food services and the important economic and human health values related to providing food to people in the Puget Sound region. However, please also recognize that VISION 2040 and its accompanying FEIS analysis is focused on the effects of a regional framework for managing growth, and does not attempt to focus on specific business sectors or communities within the region.

Please also note that the FEIS has included several elements addressing human health. Similarly, the transportation chapter also notes the importance of maintaining an effective transportation system, and for protecting and encouraging the continued vitality of job centers and industries in the region.

O-011-001

O-011-002

Thank you for identifying your preference among the alternatives.

O-011-001

on an issue of critical importance to residents of the Puget Sound region, and act as an example of best practice for other planning institutions around the world. Indeed, on many issues, they already do.

While we do not want to suggest particular language or analytical tools at this juncture, we do want to make the PSRC aware of the importance of considering food systems as a planning topic, and of our willingness to assist in this endeavor. We feel that the lack of inclusion of food systems is a fundamental flaw in the DEIS plan, and indicates, unintentionally perhaps, a crucial lack of understanding of the relationships in our region—from the relationship of food to public health, to the relationships of the food system—agriculture, processing and distribution, and retailing—on land use in our region. Significantly, the current DEIS fails to include potential environmental impacts in the region with regard to food production—farming, processing, transportation, trade, consumption, and disposal. The network of food businesses and consumers has extensive effects on land use, agricultural and resource lands, and transportation including freight traffic and greenhouse gas emissions. There are also differential impacts to water quality through run-off and agricultural practices. We feel these environmental impacts and their societal implications should be further elaborated upon in the DEIS.

Local food systems are often better equipped to address local concerns about hunger, farmland, environmental issues and energy costs. Yet, our local governments have no comprehensive local planning process to ensure a resilient, sustainable and just food system. No local government jurisdiction has a "Department of Food" and the government programs that address hunger, nutrition, agriculture, transportation and food sector labor conditions are spread across many agencies and jurisdictions. The Seattle/King County Acting Food Policy Council would like to recommend that the PSRC take this opportunity to plan for food security as comprehensively as we plan for other issues by including criteria for a healthy, sustainable food system in the growth analysis. Clearly, local food systems impact almost every substantive section of the draft plan, from transportation (how does that food get to market?) to land use (how can we keep farmers in agriculture and protect our agricultural lands from sprawl in conjunction with the Growth Management Act?) and it is a significant oversight not to include them explicitly.

The Seattle-King County Acting Food Policy Council works to ensure that all residents have access to nutritious, fresh food that is produced and distributed in a just manner; and that farming, food processing and distribution flourish as part the local economy and contribute to a healthy environment. We support the agriculture use provisions included in the Vision 2020 Update. We encourage the PSRC Council to broaden the Vision to include other food systems issues as well.

The members of the Acting Food Policy Council, representing businesses, government, non-profits, and universities, offer their support in adding this analysis to the 2020 plan update. We acknowledge that the DEIS includes some mitigation measures that address aspects of the food system, such as farmland preservation tools, farm viability, and community health, but we feel that these could be stronger and are but a beginning. While we hesitate to weigh in on a preferred alternative, we support those that have the least amount of impact to natural resources and agricultural lands while also being the most socially equitable. In essence, this amounts to preliminary support for the Metropolitan Cities and Large Cities alternatives, though our support for any alternative is tempered by the lack of analytical substance with regard to food systems. We offer no specific suggestions to the plan language or analytical structure at the time, given

O-011-002

the nature of this comment period, but we would be happy to offer such suggestions as the document continues to be developed.

Thank you again for the opportunity to have our concerns placed in the public record. We look forward to working with PSRC in the future.

Sincerely,

Branden Born, Ph.D.
Assistant Professor
University of Washington
Department of Urban Design and Planning

Mary Embleton, M.S.
Executive Director
Cascade Harvest Coalition

Tammy Morales
Community Member

For the Seattle-King County Acting Food Policy Council

O-012-001

VISION 2040 and its Regional Growth Strategy do not include a numeric minimum density threshold. However, VISION 2040 does discuss the benefits that can be obtained from density.

>>> "Karen Goroski" <kgoroski@suburbancities.org> 7/26/2006 2:36:32 PM >>>
At its July meeting, the SCA Board of Directors adopted the following recommendation from the SCA Public Issues Committee:

O-012-001

Urban Densities and Multicounty Planning Policies:

SCA opposes adoption of any MPP that would establish a quantitative threshold for appropriate urban residential densities; as such policy would overly restrict local flexibility and discretion in planning for growth.

I have attached the full text of the recommendation. Please call me if you have any questions.

Karen

Karen L. Goroski, Executive Director
Suburban Cities Association
6300 Southcenter Blvd Suite 206
Tukwila, WA 98188
Phone: 206-433-7170
Fax: 206-242-8031



Suburban Cities Association
6300 Southcenter Blvd Suite 206
Tukwila Washington 98188
Phone 206 433 7168
Fax 206 242 8076
Email sca@suburbancities.org

SCA Policy Position on Urban Densities and Multicounty Planning Policies:

SCA prefers that the Vision 2020+20 Update *not* include an MPP on urban residential densities. *However*, as the Vision 2020+20 update moves forward, should an MPP on residential densities be deemed necessary and/or desired by the GMPB, principles for such a policy that SCA would support are as follows:

O-012-001

SCA opposes adoption of an MPP that would establish a quantitative threshold for appropriate urban residential densities; as such policy would overly restrict local flexibility and discretion in planning for growth.

- The state Growth Management Act gives cities and counties discretion in their comprehensive plans to make many choices about accommodating growth.
- The suburban cities of King County are committed to encouraging and stimulating urban growth within their borders. The suburban cities will continue to accommodate their share of population growth for the current 20-year planning period and beyond, as forecast by the state Office of Financial Management, as targeted by CPPs, and as guided by an updated Vision 2020.
- Residential growth in the county and region should 1) be focused within the existing UGA, 2) make efficient use of land, and 3) achieve a compact urban pattern of development containing a range of densities and uses.
- In achieving these outcomes, decisions on specific land uses and densities should be based on local conditions and policy goals that are evaluated and balanced by local governments.

Adopted by the SCA Board of Directors – July 19, 2006



Sustainable Seattle
Ecology • Economy • Community

Board of Directors

Mark Anfin
Tacoma Power
+
Dr. Leslie Brainer
U. of Washington
Evans School
+
Cynthia Flagg
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Mark C. Griffin
Firm of Seattle
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Richard Warren
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Research Educator
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Deborah Kienitz
SUN Program
Manager
+
Nadia Lopez
SUN Program
Attorney
+
Tracy English
Program Associate
+
Ryan Marquis
Local Food Economy
Research Assistant

July 31, 2006

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

Dear Mr. Abbott:

Thank you for the opportunity to comment on the Puget Sound Regional Council's Draft Environmental Impact Statement (DEIS) for VISION 2040 Plan Update.

The DEIS notes that *VISION 2040 is uniquely suited to create a unifying vision of the ways in which current environmental planning efforts interconnect at the regional level. The VISION has the potential to meaningfully affect these issues because of both the collaborative process being used in the update and through the use of multicounty planning policies.*

We would like to commend you on both the collaborative process and the regional focus of your work. Sustainable development cannot be achieved without either of those components. We note that PSRC has included human health and social elements into the study. Sustainable Seattle promotes the inclusion of human, social, built and natural capital issues into any discussion of a sustainable future for the region.

We are encouraged by many good elements in both the Metropolitan Cities and Large Cities alternatives, but would like to urge you to consider solutions that address core problems for the region, such as affordable housing or income inequality. While we are not ready to suggest specific changes to the scope of the document, we would like, as a placeholder, to advocate for the following elements: a systems approach to understanding and analyzing future actions, an analysis of cumulative effect not just within the VISION but across other existing planning processes, true accountability of impacts that includes the just valuation of ecoservices and the use of sustainability indicators to measure our progress toward the vision you advocate.

Thank you again for the opportunity to have our concerns placed in the public record. We look forward to working with PSRC in the future.

Sincerely,

Chantal Stevens
Executive Director

1402 Third Avenue, Suite 122C - Seattle, WA 98101
Tel: (206) 622-3522 Fax: (206) 382-1046
www.sustainableseattle.org

O-013-001

Thank you for your comment.

O-013-002

VISION 2040's growth strategy is a hybrid of the focused growth alternatives, and shares many of the same benefits. Also, VISION 2040 policies address housing affordability and shared economic prosperity.

O-013-003

The VISION update and its supporting FEIS have focused on a systems-level assessment of how growth can affect both the natural environment and the human environment. The FEIS and the criteria used to help identify a Preferred Alternative provide both qualitative and quantitative measures of the performance of the alternatives considered in a wide array of environmental and policy areas.

The multicounty planning policies developed for the updated VISION have also focused on integrating economic, land use, and environmental considerations for future decisions at all levels. This includes a greater emphasis on sustainability practices in early planning through the implementation of specific projects or approvals.

From: Norman Abbott
To: Ivan Miller; Robin McClelland
Date: 7/18/2006 1:32:51 PM
Subject: Fwd: Vision 2020 Update EIS comment

please include in SEPA comments

Norman A. Abbott, Ph.D., AICP
Director, Growth Management Planning
Puget Sound Regional Council
206-464-7134
nabbott@psrc.org

>>> "Gary Brackett" <Gary.Brackett@tacomachamber.org> 7/12/2006 3:03 PM >>>
Dear Mr. Abbott,

As our offices proceed in the review of the Vision 2020 Update EIS, there occurs a recommendation we wish to make promptly so as not to have time expire on the public comment suspense date.

Specifically, we recommend PSRC include in its distribution the major military installations in the Puget Sound region. I am below providing contact information for Ft. Lewis and McChord AFB, but would encourage PSRC to seek contact with other installations in Snohomish and Kitsap Counties. You might also consider how RCW 36.70A.350, which addresses local jurisdictional planning around military bases is appropriate for a regional planning policy effort.

Col. Thomas Knight
I Corps & Fort Lewis
Box 339500
Fort Lewis WA 98433-0950
P: 253-967-0146
E: thomas.knight@lewis.army.mil

Col. Jerry Martinez
Commander 62nd Airlift Wing
McChord Air Force Base/AMC 62nd Airlift Wing
773 Main St #1027
McChord AFB WA 98438

O-014-001

The distribution list has been updated. Thank you for the suggested additions.

O-014-001

O-014-001 | P: 253-982-2621

E: jerry.martinez@mcchord.af.mil

Gary

Gary D. Brackett, CCR
Manager, Business and Trade Development
Tacoma-Pierce County Chamber
950 Pacific Ave., Ste. 300, 98402
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Tacoma WA 98401-1933
P 253.627.2175 F 253.597.7305
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July 31, 2006

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

Via Email: Norman Abbott [NAbbott@psrc.org]

RE: Vision 2020 Update Draft EIS

Dear Mr. Abbott:

Thank you for the opportunity to comment on the *Vision 2020 Update Draft Environmental Impact Statement*. The Chamber was significantly involved in the original Vision 2020, and welcomes this occasion to contribute positively to its update.

The Chamber wishes to address several areas that we believe deserve a greater, more in-depth scrutiny by the PSRC in this updating process.

Industrial Lands

The Chamber notes that both Seattle and Tacoma have recently addressed public issues associated with industrial lands and gentrification factors encroaching upon those resources. Just as a community protects its residential and environmental preserves, the Chamber acted to support designated land as the basis for our industrial wealth generation. During that process, the Chamber reviewed the industrial lands available for such community purposes.

At that time, the PSRC was able to identify for us only two relevant studies, both related. These are: "Industrial Land Supply and Demand in the Central Puget Sound Region," (1998) and "Technical Addendum: Employment, Land Use, and Infrastructure Characteristics of Lands Designated in Comprehensive Plans" (2000). Both these studies use as industrial lands a database compiled from 1996.

These studies do refer to net supply of industrial lands. In "Technical Addendum," Appendix 6: Industrial Land Supply: Proximity to Existing Jobs and Infrastructure, pg. 36, the Port of Tacoma area is cited as having a net supply of 936 acres. We've attempted a "hurry-up" update of these databases.

O-014-002

Thank you for the background information on the Chamber's efforts and for providing additional information on the addition of lands since the last major inventory was undertaken. Your suggestions for activities to encourage sufficient supply of industrial lands are included as potential mitigation measures in the Final EIS. The multicounty planning policies also include strategies supporting manufacturing/industrial lands, and the VISION 2040 actions call for an update to the industrial lands study.

O-014-002

O-014-002

In the about 10 years since the databases in these studies were compiled from the submittals of local governments, the Port of Tacoma has increased (purchased) its land supply in 1995 to 2005 by a net 232 A in the tideflats while decreasing their undeveloped land by 130 A. This leads to a net consumption of 362 A by the Port of Tacoma alone. (There is a set-aside of 40-43 acres for the SR-167 ROW tie with SR-509 through Tacoma and Fife. The PSRC was unable to determine if the local governments' 1996 database included acreage used in support of SR-509. The Chamber did not review information about consumption by other users in the port-industrial area or the total remaining supply of other industrial lands in the metropolitan area.)

The Chamber encourages the region to retain and identify enough usable industrial lands so as to support an economy of sufficient size and strength for the region's anticipated population growth and so recommends a study to verify the sufficiency of industrial lands, a policy of no-net-reduction of industrial lands and a proactive initiative to identify, properly prepare and support with infrastructure industrial lands.

Military

O-014-003

The Draft EIS examination of employment trends (Executive Summary, Figure 5-1-3, pg. 5.1.5) obscures the economic impact of military employment. The separation of "Military," presumably uniformed personnel, is an incomplete picture. Substantial numbers of the industrial category "Govt & Educ" would include civilian employment associated with military installations. For example, in "Economic Impacts of the Military Bases in Washington," by Dr. Paul Sommers, July 2004, the 2003 military employment for installations in Pierce, Kitsap and Snohomish Counties is 66,516 (Table 2.1, pg. 2)(attached).

At about that time (December 31, 2005), the Chamber had documented uniformed and civilian employment at installations in Pierce County of 43,021 jobs. In the interval relevant to the Figure 5-1-3, the military (uniformed and civilian) employment in Pierce County has grown from 33,198 in 2000 to 50,829 in 2005 (see attached "National Defense Impact of Tacoma-Pierce County Installations").

It is our conviction that the methodology used in preparation of Fig. 5-1-3 does not fairly portray the size of the military industry and does not forecast accurately its growth. The Chamber recommends the region more accurately identify the military industry so as to properly evaluate related land use, planning and transportation decisions.

O-014-004

Defense Transportation

In 1956 President Eisenhower signed legislation establishing the National System of Interstate and Defense Highways (about 41,000 miles of roads). When President Eisenhower went to Kansas to announce the interstate highway system, he announced it as "the National Defense Highway System." The National Defense Highway system was designed to move military equipment and personnel efficiently. Since then, DOD has continued to identify and update defense-important highway routes.

O-014-003

While the alternative allocations of employment growth are not by industry sector or cluster, VISION 2040 has been developed to more accurately reflect the importance of the military as an economic sector, and includes policies related to protecting military lands from incompatible adjacent uses.

Also, to adjust for changes that have occurred since the VISION's base year (2000), VISION 2040 includes a technical amendment process to update the Regional Growth Strategy before the region's counties undertake the next round of Growth Management Act target-setting work.

O-014-004

The FEIS has been revised to note the importance of the Interstates in meeting national defense and commerce needs. As noted in section 5.3.3, the travel demand forecasts include assumptions that would accommodate the transportation demands for the major military bases. More specific needs for individual facilities such as I-90 and I-5, including their important role in national defense, is included in Destination 2030 and would be included when that plan is updated to 2040 after Vision 2040 is adopted.

O-014-004

This is not an academic footnote for our region. Fort Lewis is the sole Power Projection Platform on the West Coast for the nation, which involves our national interests in defense of the Pacific and Japan. In responding to that demand, the region is faced with two separate challenges. The first challenge is a sufficiency of capacity to meet the everyday transportation needs of the military installations and throughput cargo.

This everyday need is most obviously present in the I-5 and I-90 highways between Ft. Lewis and its premier training facility, the Yakima Training Center. Further insights into the strategic logistics needs of the nation might be best addressed by the Ft. Lewis Transportation Offices, the MARAD Seattle offices and the 833rd Transportation Bn./Surface Deployment and Distribution Command in Seattle, to whom the Chamber refers you.

The second challenge is surge demand, of which the above office referrals may also be relevant. For instance, the Ft. Lewis Transportation Office has made a presentation to the Freight Mobility Roundtable, May 5, 2006 about the need for a Ft. Lewis Rail Nexus and the parameters of a surge requirement on the regional infrastructure. Introductory documents about "Scenario 3" are appended to this correspondence.

O-014-005

Also, special attention needs to be paid to the effects of encroachment, the impacts on public health and safety and the demands on the land use planning and zoning implementation by local jurisdictions on the Clear Zone at McChord AFB. The legislature has recently passed legislation designed to improve future land use decisions and planning in such sensitive areas, but the land use legacy still needs remediation.

Economic Sphere

O-014-006

The Chamber recognizes the natural and logical examination of the four-county region in this Vision 2020 Update. However, the Chamber observes that the economic sphere of the region is expanding in the context of local geography.

Pierce County has for many years enjoyed an economic partnership with Thurston County, mostly epitomized by commutation of state government workers. Over the last decade, an increasing reverse commuting workforce has developed as soldiers assigned to Ft. Lewis have more and more chosen to make homes for their families in Thurston County. The recent development of distribution centers in Thurston County and the reliance on both the Port of Olympia and the Port of Tacoma for military logistics promises longer term economic ties. And, the latest joint effort by the Port of Olympia and the Port of Tacoma for the potential development of a rail and industrial facility in Maytown point to a rapid expansion of that economic sphere south.

All this economic activity argues for inclusion of Thurston County into the PSRC or at least a formal communications link for coordination of the extending economic region.

O-014-005

PSRC agrees that the major military bases in the region represent unique conditions for regional and local land use planning efforts. VISION 2040 includes a policy related to protecting military lands from incompatible adjacent uses.

O-014-006

Recognizing the importance of coordination and the interdependence of the regions, Thurston County Regional Planning Council serves on PSRC Boards, and PSRC staff serve on TRPC Boards as well. Also, the FEIS discusses the transportation relationship among the regions.

Thank you again for the opportunity to share this information with you as a response to your *Vision 2020 Update EIS*. If we may address any aspects for you, please feel welcome to make further contacts. Please keep the Chamber on the project mailing list.

Sincerely,



Gary D. Brackett, CCR
Manager
Business and Trade Development

Attachments electronically:

- Clear Zone Properties Map
- Defense Impact Statement 2005
- Economic Impacts of Military Bases in Washington
- Ft. Lewis Rail Nexus
- Ft. Lewis Scenario 3 Map
- State Strategies to Address Encroachment

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PHONE: 253-627-2175, FAX: 253-597-7305, www.tacomachamber.org

Ft. Lewis Rail Nexus Concept

Initial discussions are currently underway on post about the concept of increased rail accessibility. Mutual exploratory discussions with and among surrounding jurisdictions, have emerged, and are being brought forward within the post for evaluation. Local communities (e.g. Yelm) are identifying potential civilian benefits and the continued viability of the east line for commercial purposes is being evaluated.

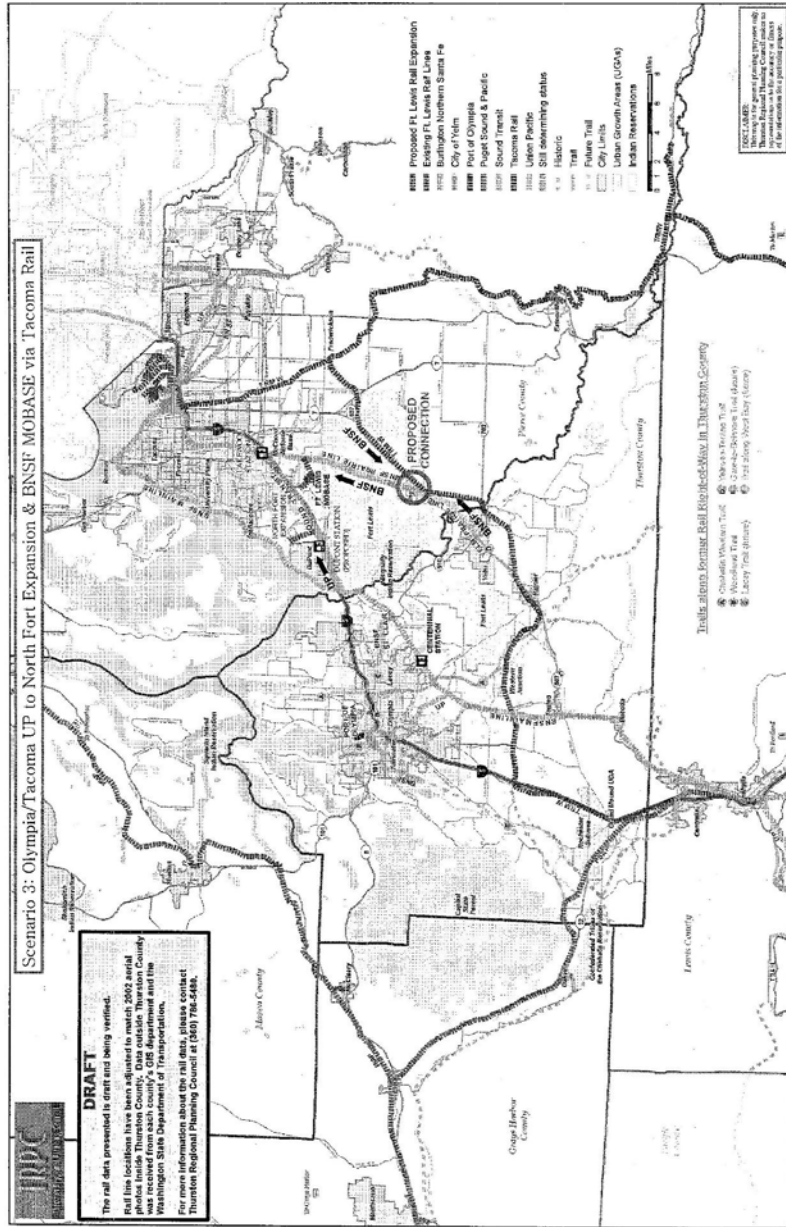
Fort Lewis needs increased rail for the ingress/egress needs of the post as the only Power Projection Platform on the West Coast. Goals are:

- a) more (redundant) rail routes
- b) redundancy of ports accessible
- c) increased marshaling yard capacity from a combination of sites on post
- d) running rights on adjacent track segments bordering the base to the east and west
- e) access to more than one commercial carrier

It has recently been determined that the Union Pacific Railroad has the right to move trains from the south as far north as Camp Murray on BNSF trackage, which is a significant entry point to rail yards internal to Ft. Lewis.

Simulations of rail *surge deployment needs*, and the implications both within the base and on adjacent and shared rail corridors have been conducted. Key considerations include Amtrak and Commuter Rail operations and the growing logistics performance requirements of Ft. Lewis as the single Power Projection Platform on the West Coast for the Pacific hemisphere. Scenario 3 (see map) can eliminate military preemption of Amtrak/Commuter Rail during deployment surge conditions – by providing more base intermodal capacity and off-base route redundancy for access/egress (the Roy line).

At issue now is finding modest front-end money to keep this systemic solution at least viable enough to later receive pinched military funding for the on-base work.



NATIONAL DEFENSE
Impact of Tacoma-Pierce County Installations
as of calendar year end

TOTALS	1994	1996	1998	2000	2002	2004	2005
Active-duty Personnel	25,183	25,142	24,573	24,395	30,912	33,169	33,893
Civilian Personnel	8,541	8,734	8,413	8,803	12,109	13,865	16,936
Retirees	n/a	30,926	32,779	n/a	n/a	n/a	n/a
Military Payroll*	\$ 759.6	816.1	830.5	837.7	928.6	1,184.1	1,624.3
Civilian Payroll*	\$ 288.9	291.1	309.4	254.0	261.5	423.8	450.9
Expenditures*	\$ 318.2	298.4	350.2	489.2	458.1	540.2	457.9

ARMY

Fort Lewis

Active-duty Personnel	19,100	20,000	19,726	19,500	26,123	27,214	28,730
Civilian Personnel	5,000	5,400	4,920	5,348	7,711	9,728	10,474
Dependents	27,700	22,120	22,977	29,000	28,990	49,498	56,980
Retirees	16,100	16,500	16,500	16,500	17,912	22,237	22,158
Military Payroll*	\$ 532.0	566.0	600.0*	585.0	702.0	885.0	1,266.0
Civilian Payroll*	\$ 182.0	173.0	175.0	109.0	108.0	251.0	246.0
Retiree Pensions*	\$ 262.0	270.0	275.0	282.0	468.0	353.0	353.0
Expenditures/Subsidies/ Construction*	\$ 199.0	154.0	208.0	208.0**	185.0	185.0	175.3

Madigan Army Medical Center

Active-duty Personnel	1,300**	1,300	1,340	1,162	1,038	1,100	1,156
Civilian Personnel	1,125**	1,216	1,460	1,456	1,624	1,700	2,075
Military Payroll*	\$ 80.0**	91.2	91.2	93.6	67.5	95.0	102.4
Civilian Payroll*	\$ 40.0**	55.8	72.1	72.1	80.6	117.8	124.8
Expenditures*	\$ 48.0**	57.0	65.2	74.8	91.9	127.0	152.8

AIR FORCE

McChord Air Force Base

Active-duty Personnel	4,783	3,842	3,507	3,361	3,361	4,324	4,007
Civilian Personnel	2,416	2,118	2,033	1,999	1,999	2,086	4,387
Dependents	6,303	6,224	4,764	4,547	4,547	6,016	5,837
Reservists	2,787	2,655	2,578	2,144	2,144	2,200	2,378
Retirees	n/a	14,426	16,279	n/a	n/a	n/a	n/a
Military Payroll*	\$ 147.6	158.9	158.4	159.1	159.1	204.1	255.9
Civilian Payroll*	\$ 66.9	62.3	62.3	72.9	72.9	55.0	80.1
Retiree Pensions*	\$ n/a	231.4**	n/a	n/a	n/a	n/a	n/a
Expenditures*	\$ 71.2	87.4	77.0	131.6	131.6	111.5	129.8

NATIONAL GUARD

Camp Murray & Pierce County

Personnel				3,160	3,455	3,785
Federal Active Duty				(390)	(531)	(461)
Tech Civil Service				(575)	(351)	(320)
Washington State				(200)	n/a	(225)
Part-time				(1,995)	(2573)	(2779)
Pay, Goods & Services	\$			47.0	114.2	110.3
CounterDrug Task Force	\$			2.6	2.5	n/a

Notes: *: \$ millions n/a: not available **: estimated #: 2003 Sources: Area military commands
TACOMA-PIERCE COUNTY CHAMBER OF COMMERCE as of 12/31/05



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July 31, 2006

Puget Sound Regional Council
 Norman Abbott, SEPA Responsible Official
 1011 Western Avenue, Suite 500
 Seattle, WA 98104-035

Dear Mr. Abbott,

Thank you for the opportunity to comment on the Puget Sound Regional Council Vision 2020 Update Draft Environmental Impact Statement (DEIS). This is a watershed moment in determining the future of the growth of the Puget Sound. We welcome the opportunity to help shape that growth, and on behalf of the staff and board of Transportation Choices Coalition, please accept this letter as the compilation of our formal comments.

To begin with, of the four growth alternatives outlined as part of the DEIS, we would like to express our strong support of the Metropolitan Cities growth alternative. Transportation Choices vision for the Puget Sound is to concentrate jobs and housing into vibrant urban centers that are connected by a variety of transportation choices including buses, trains, bike lanes, sidewalks, HOV lanes, and opportunities to drive alone. The Metropolitan Cities alternative most closely mirrors the vision and mission of Transportation Choices.

From a fundamental aspect, we believe the DEIS assumes a transportation baseline that is consistent across the four alternatives. We understand the difficulty of analyzing the land use alternatives without a constant transportation baseline. However, as has clearly been outlined in both the original Vision 2020 and the subsequent Destination 2030 transportation plan, it is clear that land use and transportation are inextricably linked. As such we would support the regional land use changes only if there are comparable transportation strategies to accomplish our goals.

That said, both Alternatives 1 and 4 (Growth Targets Extended and Smaller Cities Alternatives) have the most detrimental impacts on the transportation system. They will cause the greatest degree of spatial mismatch, result in the longest commutes, have the largest potential impact on air quality, health, and the environment and are not consistent with existing and future transportation plans at the local and regional level. We strongly oppose these alternatives.

O-015-001

Comment noted regarding your preferences among the alternatives.

O-015-002

VISION 2040 includes multicounty planning policies that support continued links between transportation and land use choices for our region through 2040. As you note, following adoption, PSRC will update Destination 2030 to align it with VISION 2040.

O-015-003

Comment noted regarding your concerns regarding these alternatives.

O-015-001

O-015-002

O-015-003

Of the remaining two alternatives we felt compelled to support the Metropolitan Cities Alternative, as stated earlier. The Larger Cities alternative, though preferable to Alternatives 1 and 4, will place additional stress on the environment by increasing the development footprint, and therefore increasing commutes, degrading air quality, and negatively impacting public health. Focusing growth in centers, as the Metropolitan Cities Alternative does has significant positive impacts on transit ridership, promotes physical activity (thereby improving public health) and results in the shortest commutes with a lower increase in Vehicle Miles Traveled.

In addition to our support of the Metropolitan Cities Alternative, we would like to see the DEIS include mention of the following policies, goals, and objectives.

Transportation and Land Use Connections –

O-015-004 The newly revised Commute Trip Reduction legislation requires regional bodies, including the PSRC, to certify local CTR plans that emphasize trip reduction. This includes the creation of GTEC's or Growth and Transportation Efficiency Centers. The Vision 2020 update should include the recognition of this future designation as a factor that could influence growth (and transportation) targets throughout the four county region.

O-015-005 School Siting was also absent throughout the Vision 2020 update. The encouragement of schools to buy land in outlying jurisdictions (where it is less expensive) has a significant impact on both the land use and transportation systems. The Vision 2020 update should include the recognition of school siting as a factor that could influence growth (and transportation) targets throughout the four county region.

O-015-006 Transportation concurrency through the Growth Management Act should have a bigger role in the Vision 2020 update. We would like to see a broader effort for the PSRC, through the DEIS, to establish multi-modal concurrency recommendations that recognize the ability of local governments to meet growth management standards through transit, bicycle, and pedestrian investments.

Transportation and Climate Change –

O-015-007 There is a growing recognition of the link between transportation and global warming. Many state and local efforts have been made to help reduce our transportation emissions, but there is still much work to be done. We recommend the PSRC take up this issue more formally by creating a fourth policy board specifically focused on Climate Change and the Environment.

O-015-008 We would also like to see that climate change impacts are included as part of the evaluation criteria in the land use and transportation sections. The development of a greenhouse gas reduction criteria in both of these sections is an important policy statement that should not be overlooked. The preferred alternative should be evaluated using reduction in Vehicle Miles Traveled (VMT) as one of the baseline standards. This would provide the clearest picture of climate change, land use, transportation, air quality, water quality, open space preservation, and the public health impact of the four alternatives.

O-015-004

VISION has addressed this issue and recognizes the CTR activities.

O-015-005

VISION 2040 policies discuss siting of many different types of facilities, and promote an approach that has urban levels of services in urban areas, and rural levels in rural areas.

O-015-006

VISION 2040 has addressed this issue, with policies related to multimodal concurrency.

O-015-007

Climate change is addressed in VISION 2040 and is a common element woven throughout the document. Also, VISION 2040 actions commit PSRC to do more work in this area. An action calls for the Growth Management Policy Board to determine its role in environmental planning. Lastly, additional focus on the impacts of and mitigation strategies for factors leading to climate change is going to be a key element in the update of Destination 2030, the region's metropolitan transportation plan.

O-015-008

Climate change impacts and vehicle miles traveled are included in the evaluation criteria (see FEIS Appendix I-C). Also, additional discussion of greenhouse gas emissions and VMT reduction are included in several sections of the Final EIS and in VISION 2040.

Transportation and Health –

O-015-009

There are significant links between the availability of transportation choices and levels of physical activity. The DEIS should include an evaluation of street networks, connectivity, access to open space, transit proximity, availability of sidewalks, and relationship to compact, mixed use developments as part of a Health Impact Assessment of each alternative.

Transportation Impacts –

O-015-010

The growth alternative that is chosen must support a growing and changing transportation system and vice versa. Therefore we would like to see a variety of concepts included in the transportation section of the DEIS:

- Greater discussion of the impact pricing, HOT lanes, and other road efficiency tools would have on the growth alternatives and then an evaluation of the alternatives based on their ability to meet those goals.
- A more detailed examination of the mode splits, including defining mode split goals for centers and then evaluation of the alternatives based on their ability to meet those goals. In addition, mode splits should be defined for both work and non-work trips. Mode split goals should include transit, SOV, carpool/vanpool, walking, and biking.
- Establishment of VMT reduction goals for each of the alternatives and the use of VMT reduction as a primary metric for evaluation of the alternatives.
- Discussion of the environmental impacts associated with the transportation decisions resulting from each alternative. Environmental impacts should include, at minimum, runoff, air quality, water quality, increase in impervious surfaces, and habitat loss.

O-015-011

Please feel free to contact me directly if you would like further clarification of these comments by e-mail: rob@transportationchoices.org or by phone: (206) 329-2336.

Thank you for your consideration,



Rob Johnson
Regional Policy Director
Transportation Choices Coalition

O-015-009

VISION 2040 policies address all these issues, and public health is discussed in the FEIS in the analysis of alternatives.

O-015-010

The suggestions made (such as mode split or VMT reduction goals) are not consistent with the purpose of the FEIS because the planned network in Destination 2030 is a constant in the analysis of alternatives. However, these concepts are embodied in the VISION 2040 policies and implementation actions. Also, the Destination 2030 update provides an opportunity to continue to address these transportation-related issues.

O-015-011

The FEIS analyzes direct effects of additional growth and development, as well as indirect and cumulative effects such as the need to develop transportation facilities and other infrastructure to meet the demands of growth. The discussion of impacts in topic areas such as air quality, water resources, etc. all anticipate the higher levels of transportation demand and future infrastructure that will come with growth. After VISION 2040 is adopted with the Preferred Growth Alternative, PSRC will update Destination 2030, which will provide further opportunities to consider the most effective strategies for addressing future transportation facilities and for addressing and minimizing its potential impacts.

To: Puget Sound Regional Council
 From: Amy Snover, Research Scientist, Climate Impacts Group, University of
 Washington (Box 354235, Seattle WA 98195)
 Re: Comments on VISION 2020 Update Draft Environmental Impact Statement

Thank you for the invitation to comment on the application of climate change information in the Puget Sound Regional Council's VISION 2020 Update Draft Environmental Impact Statement. While the DEIS as it currently stands includes only a nod to the importance of considering past and future changes in climate in regional planning, the Climate Impacts Group recommends that the selection of a preferred growth alternative and future analyses seriously engage this issue.

Climate change will increase the challenge of "maintaining and enhancing the region's quality of life in the face of this [regional population] growth." The key question facing PSRC should be "How can the region absorb another 1.6 million people and 1.1 million new jobs by 2040 while protecting the environment and our overall quality of life in the face of projected changes in regional climate?" If the PSRC (and the VISION 2020 Update) is truly to create a regional environmental vision, it must consider both of the major drivers of regional change: regional growth and regional climate change.

Why climate change must be an integral component of planning:

Changes in climate are inevitable. Human society has altered the composition of the atmosphere in ways that will change the earth's climate for centuries to come. Climate and ecosystems around the world are already changing – with temperatures rising, glaciers retreating, snowpack disappearing, spring arriving earlier, plants and animals shifting, and seas rising. And more change is on the horizon, no matter what society decides to do about greenhouse gas emissions. This change is coming rapidly – within a handful of decades, the climate in the PNW is likely to be significantly warmer than during even the warmest years of the 20th century.

Puget Sound climate is already changing. The earth has warmed more than 1 degree Fahrenheit during the 20th century and the warming in the Puget Sound has been more than twice this amount – average annual temperature increased 2.3°F during the 20th century. During the 20th century, especially since 1945, snowpack has been declining throughout the West, with the Cascades showing some of the largest losses (30-60% at many locations). The Cascades have experienced a decrease in April 1 snowpack of nearly 30% when comparing the winters for 1945-1955 to the winters for 1990-1997. Peak streamflow (i.e., the spring snowmelt period) is occurring earlier in the spring, also as a result of increasing temperatures.

Changes in Puget Sound climate are expected to accelerate. Climate models project a warming rate in the Pacific Northwest of roughly 0.2-1.0°F per decade at least to 2050, with average warming of 1.8°F by the 2020s and 3.0°F by the 2040s.

O-016-001

We concur with the comments regarding the importance of climate change. VISION 2040 has a set of policies and implementation actions that will help the region minimize its contribution and adapt to the impacts of climate change. This includes a policy committing the region to comply with state initiatives on this topic.

O-016-001

O-016-002

Puget Sound's economy and natural resources are sensitive to changes in climate. Management of hydroelectric power production, water supply systems, flood and storm management, forests, fisheries, and the coastal zone is predicated on observed patterns and extremes in temperature and precipitation. Each of these sectors has adapted to the timing and length of the seasons, the range of temperatures, and the amount and frequency of precipitation that has been experienced in the past. As temperature increases and precipitation patterns potentially change during the 21st century, current management practices may not achieve the results for which they are designed.

Projected changes in climate will have far-reaching impacts. These include: reduced winter electricity demand and increased winter hydroelectricity production potential; increased summer electricity demand and decreased summer hydroelectricity production potential; increased difficulty for water suppliers to meet the needs of consumers and in-stream flow requirements, especially in snowmelt-fed watersheds; increases in the frequency of flooding in some river basins; shifting ranges of plant, animal, and pest species; increasingly favorable conditions for fire and pest outbreaks, which could become more frequent and severe; inhospitable environmental conditions for many Pacific Northwest cold water fish populations; increasing risk to PNW salmon; higher sea levels in Puget Sound with associated wetland loss, increased erosion, and local areas of inundation. Climate impacts on water resources will be integral. The hydrologic changes will likely be most detrimental and acute during the summer, as water is projected to be less available, in many cases exacerbating existing conflicts over limited resources. These and other "trickle-down" impacts of climate change are likely to have profound consequences for the environment and economy of the region. Similar to the changes wrought by population growth, climate change will force the region to evaluate complex tradeoffs among different resource uses. For more information on climate change impacts on Puget Sound natural and human systems, please see the attached documents, labeled CIGAttachmentA.pdf ("Climate Impacts on Washington's Hydropower, Water Supply, Forests, Fish, and Agriculture") and CIGAttachmentB.pdf ("Uncertain Future: Climate Change and its Effects on Puget Sound").

Today's choices will shape tomorrow's impacts. Although the climate changes occurring through the mid 21st century are largely unavoidable, the ultimate consequences of those changes will depend strongly on today's decisions for preparation and adaptation. The rapidity and inevitability of impending change means that significant changes in climate are expected within today's planning horizons and within the lifetimes of today's infrastructure investments. The local consequences of global warming will depend in a large part on decisions being made now – about land use, resource management, infrastructure investments, and insurance incentives, for example. How these choices are made will be crucial in shaping our region's vulnerability – or resilience – to future climate changes.

O-016-003

Regional preparation is essential. Because global warming will have different impacts around the world and because resource management systems, institutions, and legal and political tools differ regionally as well, the regional to local scale is best place to respond to – or prepare for – these impacts. Because global warming will affect Puget Sound

O-016-002

Thank you for providing additional information on the issue of climate change, and for emphasizing the importance of regional actions to help reduce greenhouse gas emissions.

O-016-003

Your suggestion for addressing climate change at a regional scale is noted. Please see the VISION 2040 multicounty planning policies for more information regarding climate change at the regional and local levels.

O-016-003

natural resources in ways that transcend local jurisdictions, it will be essential to coordinate response at the regional scale.

Climate change in the VISION 2020 Update DEIS:

Climate change will change the environmental baseline upon which the VISION 2020 Update's DEIS analysis is based.

O-016-004

2 Regional Environmental Baseline

Rather than relegating the impacts of climate change to a couple paragraphs in this section (pp. 2.8 and 2.10), these impacts should be woven into the consideration of regional implications here and in the other chapters. For example, discuss the implications of sea level rise and other climate-related changes under "Water Quality and Aquatic Habitat"; discuss coastal wetland loss and forest stress/damage under "Terrestrial Habitats and Species". The focus of this section has to be on increasing ecosystem functioning in a changing climate with actions prioritized and standards set based on expected climate change impacts.

I'm surprised that the Puget Sound Action Team wasn't identified as having indicated climate change as a priority environmental issue (Figure 2-11), given Brad Ack's action on the same and on their commissioning of the October 2005 Climate Change report from the Climate Impacts Group (CIGAttachmentB.pdf).

Climate change will combine with the indirect impacts of the VISION 2020 Update to increase the cumulative effects of various growth alternatives.

O-016-005

5.5 Ecosystems

As described in the attachments and in other publications of the Climate Impacts Group (see www.cses.washington.edu/cig), climate change will affect regional ecosystems in a myriad of interconnecting ways – from increasing the chance of winter flooding and decreasing and warming summer streamflows to altering Puget Sound food-web interactions. The concern here is that without considering the way that climate change may degrade or further stress regional ecosystems, the ecological impacts of growth may be underestimated, leading to higher levels of ecological damage than expected or perhaps acceptable. In particular, the decreasing availability of summer water will sharpen the conflict between human and ecological water demands.

O-016-006

5.6 Water Quality and Hydrology

Not only does regional growth "have the potential to aggravate existing water quality problems..." but so does climate change. As described above, warmer temperatures would cause further declines in mountain snowpack and in natural water availability in summer, potentially degrading water quality then (with water temperatures likely to increase). Climate change is expected to increase flooding in Puget Sound watersheds. Sea level rise in Puget Sound would inundate low-lying areas and increase the risk of flooding along the shoreline.

O-016-004

Several of the Draft EIS sections included climate change issues under the cumulative effects analysis, and as additional information has become available, more discussion has been included in the Final EIS. In addition, the Air Quality section of the FEIS (Section 5.4) has increased the emphasis placed on climate change. The Puget Sound Action Team does have a clear interest in climate change, and Figure 2-11 has been revised accordingly.

O-016-005

The effects of climate change are noted in Chapter 5.5., Ecosystems.

O-016-006

Climate change is now discussed in several sections of the Final EIS, including under cumulative effects, Chapter 5.6.3.

O-016-007**5.7 Public Services and Utilities**

"Under all alternatives", the DEIS states, "current water capacity may not be sufficient." Climate change would exacerbate this problem, decreasing the amount of water stored as snow in the mountains and therefore decreasing the amount of water naturally available during the summer dry months. Without consideration of this shifting baseline, needs for system upgrades, infrastructure investments, etc., will be underestimated.

O-016-008**5.13 Earth**

The increased risk of flooding in Puget Sound watersheds projected to accompany global warming should be included in the analysis of future flood risks under different growth patterns, especially where a growth alternative has the potential to increase development in floodzones. Sea level rise, and its associated impacts of bluff erosion, inundation of low-lying lands and loss of coastal wetlands/habitat, should also be considered.

Recommendations:**O-016-009**

Include a consideration of climate change in every analysis undertaken under the PSRC planning process – both in estimate of the changing environmental baseline and in the way indirect impacts of the plans are estimated. Climate change must be a core consideration of regional environmental planning efforts.

O-016-010

We support your proposal to develop an environmental board and suggest that examining the combined impacts of climate change and regional growth be a core responsibility of this board. Like growth, climate change will affect many components of the regional system. It will be crucial to plan and implement a coordinated regional response to both of these drivers of change.

PSRC should play a leading role in making sure regional planning efforts – and the local processes that are informed by them – are aimed at increasing the Puget Sound region's resilience to the inevitable impacts of climate change. PSRC should coordinate with regional planning efforts incorporating a consideration of climate change. To avoid duplication of efforts and to develop best practices in regional preparation for climate change, PSRC should coordinate their efforts in this area with other groups similarly involved: e.g., Shared Strategy (who has examined the implications of climate change for streamflow changes and salmon recovery in the Snohomish River basin), and the King County/Cascade Water Alliance regional water supply planning process (that is addressing, among other things, the implications of climate change for long-term supply, demand, and instream flow planning).

O-016-007

Additional discussion of climate change has been added to the Final EIS under cumulative effects to water supply and in the comparison of alternatives.

O-016-008

The Final EIS has several sections that address the potential impacts of climate change as a cumulative effect, including flooding, which is addressed in Chapter 5.6 (Water Quality and Hydrology). However, since the Final EIS is focused primarily on the regional growth alternatives, and the extent of flooding and subsequent erosion is unknown at the regional level, additional detailed analysis of impacts due to climate change is not warranted for adoption of the updated VISION.

O-016-009

Climate change is addressed in the air quality analysis chapter of the FEIS. It is also one of the evaluation criteria. Beyond the FEIS, VISION 2040 advances the concepts of protecting the environment and addressing climate change. Policies related to both of these issues are found in the multicounty planning policies section, in the environment and transportation sections, as well as in other sections of the document. VISION 2040 begins with an environmental and sustainability framework chapter, and its implementation actions include future work on the Regional Council exploring its role in regional environmental planning. Lastly, climate change is a key element in the update of Destination 2030.

O-016-010

VISION 2040's short-term implementation actions call for the Regional Council to explore its role in regional environmental planning. This will be done subsequent to adoption, and will explore the potential for a fourth board.

Transit Ridership Expectations are Falling in Puget Sound Regional Transportation Planning

by John Niles, Public Interest Transportation Forum Co-founder and Editor

Transit and Carpool Market Share Forecasts are Revised Downward in New Documents from PSRC

The transportation planning agency for the Seattle-Tacoma-Bellevue-Everett-Bremerton region of Washington State is updating its long-range plan as of summer 2006. This document, for the Vision 2020 Update, is posted at <http://www.psrc.org>.

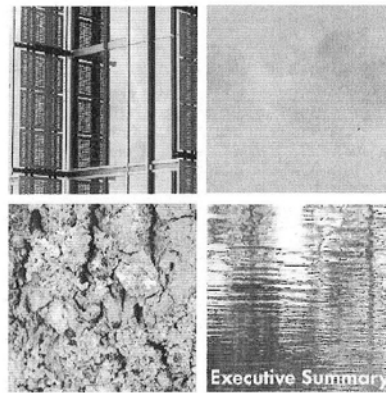
Puget Sound Regional Council (PSRC) prepares the transportation plan for four counties -- King, Pierce, Snohomish, and Kitsap --- under mandates and assignments of authority and responsibility from both state and federal government. As part of this planning effort, PSRC issued a draft environmental impact statement (EIS) in spring 2006 to update earlier planning work.

Data displayed inside this draft EIS (DEIS) is very revealing of public transportation's future under the Destination 2030 Metropolitan Transportation Plan issued in May 2001. Selections from the new DEIS are excerpted below on this page.

The DEIS forecasts that the transit market share *in 2040* will reach just 11.6% of work trips, and 2.5% of non-work trips, if present policies are pursued and the implementation of Destination 2030 continues.

As context, in the May 2001 version of the Destination 2030 Metropolitan Transportation Plan, the forecast *for 2030* transit mode share was 11.8% for work trips and (by calculations using PSRC's numbers) 3.3% of non-work trips. In other words, the PSRC's expectations for transit use in the future are headed downward, despite the inclusion of more than

VISION 2020 Update Draft Environmental Impact Statement



<http://www.bettertransport.info/pitf/transitmodeforecastdropping.htm>

10/18/2006

O-017-001

Thank you for background information regarding transit ridership. Note that the VISION 2040 project used the adopted metropolitan transportation plan, Destination 2030, as the transportation network for the analysis of all the alternatives. As such, none of the transportation model assumptions changed or varied from the adopted plan. Note, however, that the update of Destination 2030 will provide an additional opportunity to address this issue.

100 miles of Sound Transit's High Capacity Transit system in the Destination 2030 Plan.

Every bit of Sound Transit's most expensive Phase 2 Plan trial scenario -- requiring a half-cent hike in the regional sales tax -- is assumed to be in operation for the disturbing scenario forecasts presented on this page.

The Puget Sound Regional Council Draft document summarized on this page can be understood as a new prediction that shows less benefit than was previously expected from Sound Transit's multi-billion dollar passenger railroad schemes.

PSRC's new DEIS document suggests that major changes in regional public policy are needed to achieve by 2040 the transit mode share that was just five years ago forecast to occur by 2030. The major change -- implementation of the "Metropolitan Cities" alternative described below -- would push work-trip transit mode share from 11.6% under present policies to 11.7% and non-work-trip transit use from 2.5% to 3.1%.

Falling Transit Market Share			
	2001 Forecast for 2030 based on policies and plans	New 2006 Forecast for 2040 with same policies and plans	New 2006 Forecast for 2040 with major policy changes
Work Trips	11.8%	11.6%	11.7%
All Other Trips	3.3%	2.5%	3.1%

The difference between the first and last column of the table reveals a drop from the 2001 forecast!

Furthermore, the uncertainty in forecasts like these for more than 30 years in the future is enormous as explained by Nelson and Niles in a paper (pdf file) posted here.

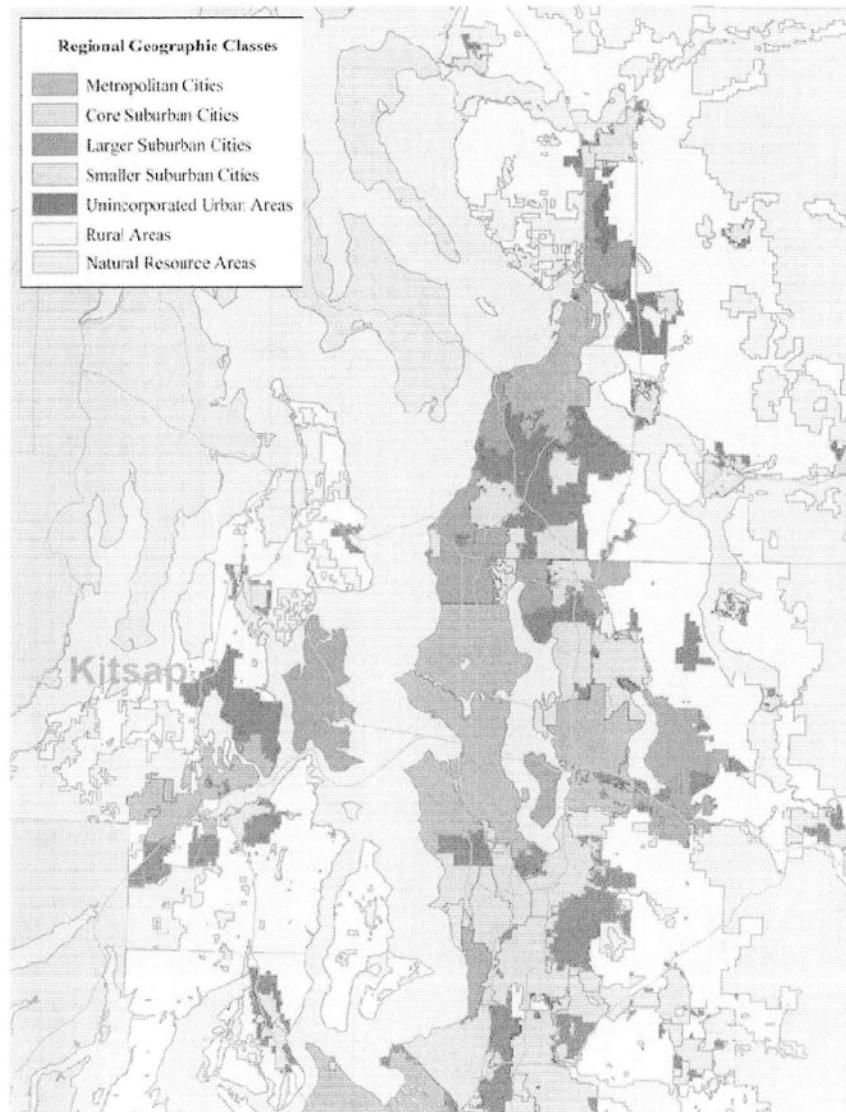
Revised forecasts of future transit performance may be charitably attributed to increasing sophistication in PSRC's planning methodology.

Take a look:

PSRC's categorization of the central Puget Sound geography appears in DEIS as on the following map. The five highest population municipal jurisdictions -- Seattle and the others named in the lead paragraph above -- are termed "Metropolitan Cities." Suburbs of these largest places are tiered by population into three categories of urban city: core, larger, and smaller. These suburban municipal jurisdictions of all size are within the Urban Growth Area required by the State of Washington's Growth Management Act.

Remaining territory inside of the formally-described Urban Growth Area is termed "Unincorporated Urban Areas." The remaining sections of the four counties in the region are

either in rural areas or natural resource areas, the latter being mostly forests (green on the map below). Public policy set by the Growth Management Act is that regional population growth should be mostly constrained to take place within the Urban Growth Area (UGA).

FIGURE 4-2: REGIONAL GEOGRAPHIES MAP

<http://www.bettertransport.info/pitf/transitmodeforecastdropping.htm>

10/18/2006

As part of the planning exercise, PSRC created computer models forecasting transportation results for the year 2040 that would occur with four alternative future scenarios for the distribution of population growth inside the UGA. The four scenario alternatives are shown in the following table.

The Growth Targets Extended Alternative is a continuation of present trends and shows 73% of new employment locations ending up in the Metropolitan and Core Suburban Cities, while only 43% of new population growth occurs there. This trend of more offices in the main cities and most housing in the suburbs is driven by the high cost of housing in Seattle and Bellevue. At the same time, 37% of population growth goes to the fringes of the region in unincorporated and rural areas, with only 11% of new employment locations ending up in the fringes. This scenario is considered to be the "No Action Alternative" that represents currently adopted public policy, and would presumably continue if no action were taken to alter the current pattern of development.

Journalist Eric Pryne described the reality of today's separation of housing and jobs in a *Seattle Times* article July 22, 2006 available [here](#) (external link).

The three remaining alternatives in the DEIS from PSRC place differing proportions of population growth and employment growth in the various categories of the regional geography, and represent quite large shifts from the present trend line. These represent a basis for a regional conversation on how transportation investment decisions are being made.

As seen in the table below, the PSRC's Metropolitan Cities Alternative severely clamps down on population growth in the geographic fringe and puts more population and employment growth into the three largest categories of cities. This is the alternative that seems to be the most consistent with the present trend of regional land use and transportation planning policy.

Flash: Seattle Mayor Greg Nickels endorses PSRC Metropolitan Cities Alternative, supporting the addition of 60% more residents to the City, as described in *Seattle PI* news article, August 19th, 2006, "Seattle: Home to 1 million? Some say mayor's idea of adding 350,000 to the city is 'laughable'" by Angela Galloway.

The Larger Cities Alternative also limits fringe growth, but also shows lower population and employment growth in the five metropolitan cities, so that the growth focus is on the core and larger suburban cities.

The Smaller Cities Alternative puts 65% of growth into smaller suburban cities and the unincorporated areas, with growth in the metropolitan and core suburban cities reduced by more than 50% from the No Action case.

Following is a table detailing how population and employment growth were allocated in each of the scenarios.

REGIONAL GROWTH ALTERNATIVES COMPARISON
 SHARE OF POPULATION AND EMPLOYMENT GROWTH, BY REGIONAL GEOGRAPHY

2000-2040 Growth Allocations		Metropolitan Cities	Core Suburban Cities	Larger Suburban Cities	Smaller Suburban Cities
Growth Targets	Population	26%	17%	9%	10%
Extended Alternative	Employment	45%	28%	7%	9%
		545,000	347,000	80,000	109,000
Metropolitan Cities	Population	40%	25%	15%	10%
Alternative	Employment	45%	30%	10%	5%
		549,000	366,000	122,000	61,000
Larger Cities	Population	20%	30%	30%	5%
Alternative	Employment	20%	30%	30%	5%
		244,000	366,000	366,000	61,000
Smaller Cities	Population	10%	10%	5%	30%
Alternative	Employment	10%	10%	5%	30%
		122,000	122,000	61,000	366,000

Notes: Totals may vary due to rounding. The percentages represent what was adopted by PSRC's Growth Manager. For each alternative, the shaded areas represent the geographies of focus. Please see the footnote on page 5 on the total growth figures.

What is interesting about all of these alternatives is the degree of change in transportation performance that is revealed by the computer model projections, assuming that the amount of overall trip-making remains the same no matter which scenario is considered. The following results are exactly as presented in the EIS.

A. IMPACTS COMMON TO ALL ALTERNATIVES

With the region's population and economic base projected to expand by 1.7 million residents between 2000 and 2040, there could likely be significant impacts to the regional transportation system if the growth is distributed within the region. The following points provide an indication of the scale of impacts at the regional level:

- *Overall trip-making* is estimated to increase by approximately 72 percent.
- *Single-occupancy vehicle trips* are estimated to increase 63 – 72 percent.
- *High-occupancy vehicle trips* are estimated to increase 66 – 75 percent.
- *Transit trips* are estimated to increase 76 – 146 percent.
- *Biking and walking trips* are estimated to increase 66 – 115 percent.
- *Vehicle miles traveled on the freeway system* are estimated to increase 43 – 53 percent.
- *Vehicle miles traveled on the arterial system* are estimated to increase 53 – 81 percent.
- *Vehicle hours traveled on the freeway system* are estimated to increase 48 – 99 percent.
- *Vehicle hours traveled on the arterial system* are estimated to increase 66 – 111 percent.
- *Delay on the freeway system* is estimated to increase 18 – 150 percent.
- *Delay on the arterial system* is estimated to increase 126 – 292 percent.

To help illustrate these percentages, the following figure provides an overview comparison of the base year 2000 and to one another.

FIGURE 5-3-3: SUMMARY COMPARISON OF ALL 2040 ALTERNATIVES AND BA:

Note: 100 percent means the indicator is the same as it would be for base year 2000. For example, A

<http://www.bettertransport.info/pitt/transitmodeforecastdropping.htm>

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"Accessibility of Activities by Transit," the fifth measure from the top in the graphic just above, is a measure that stands out as singularly higher for the Metropolitan Cities alternative, and much the same for all other cases; note the red oval above that marks this result. What this measure means is the fraction of regional employment that is within a 10-minute walk, a 20-minute bicycle ride, or a 30-minute transit ride for regional residents.

Using a 30 minute transit ride as the "limit" for this measure is significant, because, the average travel time for the one-way commute to work in a car is revealed to be 25 minutes today (year 2000), and 29 minutes in 2040 under the No Action scenario.

What is very noteworthy, as seen in the following table from the DEIS, is that the fraction for Accessibility by a 30 minute or less transit ride is below two percent for the base case, and for all alternatives as well! For all cases except for the Metropolitan Cities Alternative, this measure of transit accessibility is below one percent, and does not rise above the level achieved today!

PITF estimates that PSRC is using the data on this page to tilt regional citizens toward embrace of the Metropolitan Cities Alternative, since improved access to work sites by transit is a core transportation policy of the region.

Another interesting observation in the above graphic is the impact of the various alternatives on freeway and expressway travel. Relatively small reductions in total use of these freeways (top blue circle in above graphic) results in dramatic reductions in delay on the freeways and expressways (middle and lower blue circles).

**FIGURE 5-3-4: SUMMARY COMPARISON OF ALL 2040 ALTERNATIVES:
VALUE OF EACH ALTERNATIVE BY REGIONAL TRANSPORTATION INDICATORS**

Performance Measure	Base Year (2000) Alternative	Growth Targets Extended Alternative	Metropolitan Cities Alternative
Average Trip Distance (miles)			
Work Trips	13.1	13.1	12.1
Non-work Trips	6.5	6.6	6.1
Average Trip Time (minutes)			
Work Trips	25.4	29.1	25.4
Non-work Trips	14.5	15.5	14.3
Accessibility			
Transit Access to Work	.70%	.65%	1.52%
Transit Access to Non-work	.84%	.73%	1.69%
Selected Mode Share – Work Trips			
% Single-occupancy vehicle	79.5%	76.2%	73.6%
% Transit	8.4%	11.6%	11.7%
% Walk/Bike	4.5%	4.5%	7.2%
Selected Mode Share – Non-work Trips			
% Single-occupancy vehicle	46.2%	45.5%	44.8%
% Transit	2.1%	2.5%	3.1%
Vehicle Miles Traveled			
Total vehicle miles traveled	81,383,000	137,104,400	122,230,200
Freeway vehicle miles traveled	35,589,000	54,301,800	52,090,000
Arterial vehicle miles traveled	45,794,000	82,802,600	70,140,200
Vehicle Hours Traveled			
Total vehicle hours traveled	2,426,000	5,025,900	4,026,900
Freeway vehicle hours traveled	766,000	1,522,800	1,274,700
Arterial vehicle hours traveled	1,660,000	3,503,100	2,752,200
Delay (seconds/vehicle-mile)			
Total Delay	10.9	32.4	21.0
Freeway Delay	15.6	39.0	26.2
Arterial Delay	7.2	28.1	17.2
Delay (total hours)			
Total Delay	245,300	1,235,300	713,900
Freeway Delay	154,100	588,700	378,500
Arterial Delay	91,200	646,600	335,400

Note: For the geographical area listed in the figure title, the mode share and average time data refer to "trips all"

The table above as presented by PSRC in its DEIS [with the carpool/vanpool mode share inserted by PITF] The published version does not indicate the carpool/vanpool market share. Carpool/vanpool use is very important for cost-effectively reducing the number of vehicles on the road during peak periods. PITF has entered what is assumed to be this part of the market mix by entering a new additional carpool/vanpool number for work trips that forces the sum of mode shares to reach 100%. Interestingly, and perhaps explaining the omission of this number by PSRC, the 7% to 8% range indicated now for 2040 is dramatically lower than the 32.5% share forecast for 2030 in the 2001 version of the Metropolitan Transportation Plan. This drop screams for an explanation by PSRC.

The table above forecasts how much difference will be made in our region by the completion of Sound Transit's light rail transit program (Everett-Seattle-Tacoma and cross-Lake to Bellevue and Redmond) plus some kind of BRT in the I-405 corridor, AND coupled with extreme urban densification in the "Metropolitan Cities Alternative."

As an attempt to put the best possible light on the potential of much more densification in the Metropolitan Cities Alternative to reduce solo driving, here is a simplified excerpt from the table above from PSRC that focuses on the best case:

	Base Year 2000 Actual Experience	New Policy of Much More Densification, 2040 Forecast	Current Densification Policies Extended, 2040 Forecast	Modeled Superiority in 2040 of Much More Densification Compared to Current Policies
Traffic Delay (Seconds/VMT)	11	21	32	Cuts traffic delay growth by more than half
Average Commute Time	25 minutes	25 minutes	29 minutes	Maintains today's travel time
Non-SOV travel modes	20%	26%	24%	SOV share reduction is 50% higher

With this alternative, traffic delay measured in seconds per vehicle mile traveled (VMT) is forecast to double from 11 seconds to 21 seconds, an increase of 10 seconds. But, the average one-way commuting time is forecast to remain in 2040 where it was as of 2000, 25 minutes.

How come? Well, more people are forecast to be riding transit or HOV/biking/walking, the non SOV travel modes: the solo driving market share for commuting is forecast to drop from 80% to 74%, with a corresponding pick up in transit/HOV/bike/walk share from 20% to 26%.

But, as shown in the third column of numbers, building out Sound Transit's system, but continuing present growth policies with no extra push on densification, delay per vehicle mile is forecast to go from 11 seconds in 2000 to 32 seconds in 2040, a 21 second increase, and the transit/HOV/bike/walk commuting market share goes from 20% to 24%. This is not as good a result as is forecast to occur with more densification of housing and jobs in the Metropolitan Cities Alternative.

In other words, the official PSRC computer modeling shows that a new push to increase densification cuts the growth in traffic delay more than in half, and boosts the transit/bike/walk market share growth by 50%, from a 4 point growth to a 6 point growth.

Also, without the densification push, average one-way commute time is forecast to be 29 minutes in 2040, up 4 minutes from the 2000 time of 25 minutes, instead of forecasting no increase.

Question: Setting aside questions about the feasibility of the extreme densification called for in the Metropolitan Cities Alternative, what are the assumptions about the seasonal impact of weather and winter darkness on an overall daily increase in walking/biking (shown in the PSRC Figure 5-3-4) from 4.5% to 7.2% of commute trips, a 60% increase?

Another question that arises from the table is how to evaluate the precision of the forecasts for vehicle miles traveled and vehicle hours traveled on freeways and arterials. Consider, for example, the difference between the Metropolitan Cities scenario and the Growth Targets Extended scenario: **the freeway vehicle miles traveled drop by about 2.2 million, or about 4%, which causes total freeway delay to drop by 521,000 hours per day, or 42%.** That is, the improvement in freeway delay is highly leveraged against freeway vehicle miles traveled, a relationship that makes sense considering traffic dynamics. Traffic converts from free-flow to congestion when just a few more cars enter the stream. **However, if the forecast for a drop in freeway VMT in 2040 in the Metropolitan Cities Alternative is too high, then the reduction in congestion won't happen.** How precise can PSRC be in its forecasts for reduced freeway use in the year 2040?

According to the DEIS the (only) "Significant Unavoidable Adverse Impacts" in transportation occur in two of the four future scenarios, as follows:

The Growth Targets Extended Alternative, by definition, would focus employment growth in metropolitan and core suburban cities, while it would result in population growth in these same cities, as well in the unincorporated urban and rural areas. This alternative has the greatest mismatch between where population and employment growth is allocated. To some extent, this mismatch results in Growth Targets Extended having the highest performance results on a variety of regional indicators (such as total vehicle miles traveled, total vehicle hours traveled, and total hours of delay).

The Smaller Cities Alternative, by definition, would focus employment and housing growth in smaller suburban cities and unincorporated areas within the urban growth area, with access provided almost exclusively by automobile. This alternative disperses automobile trips to areas where additional roadway capacity can be provided; however, it appears that the associated increases to vehicular travel demand could result in significant impacts to existing and planned transportation infrastructure.

If additional roadway capacity beyond *Destination 2030* is not provided or is shifted from investments in the core

areas, significant traffic congestion could occur with the Growth Targets Extended and Smaller Cities alternatives.

By implication, the lack of "significant unavoidable adverse impacts" for the two remaining scenarios, Metropolitan Cities and Larger Cities, makes them more desirable from a transportation impact point of view.

Return to the Public Interest Transportation Forum home page.

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